

From: <QPIF@aol.com>
To: <drd@nrc.gov>
Date: 09/13/2004 9:22:12 PM
Subject: Quigley's Comments for Sept 14 Fatigue Meeting

Dave,

These are my prelim comments on the proposed rule. I would appreciate if you could cover the info below, including the horse race comment, at the beginning of the meeting. As a protocol issue, I understand you would not be representing my views but instead relaying them. Please drop a brief e-mail prior to the meeting letting me know you received this.

NRC's proposed changes are a substantial improvement over both the August and July proposals and are obviously the product of a great deal of work by the Staff. Notable improvements are of course the elimination of the quarterly and annual limits as well as:

The 24/48 hr break requirements,

The beginning of addressing the transient work force,

The requirement to address fatigue in the annual FFD report,

The requirement to conduct the face to face assessments within 2 hours of exceeding a limit,

The requirement that outages in close succession be counted as one, and

The requirement to evaluate circumstances regarding exceeding averages of 54 or 66 hours per week.

I object to any attempt to increase the weekly average criteria to greater than 48 hours as briefly mentioned by industry at the August meeting. Also, it is not clear if Option A and B will be options in the published rule or if they are options for discussion to select one for the final rule. Option A doesn't make much sense, since the time of will occur at the beginning of the outage. A periodic break in of 48 hours every 28 days seems more appropriate.

We have been grooming this horse long enough; get it out of the barn and in the race.

Regards,

Barry Quigley

CC: <rlk@nrc.gov>, <dct@nrc.gov>

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