

DOCKET NUMBER
PROPOSED RULE **RR-26**
(67FR 07093)

25

From: <tlc1196@comcast.net>
To: <opa1@nrc.gov>
Date: Wed, Apr 27, 2005 10:40 PM
Subject: FFD

DOCKETED
USNRC

May 11, 2005 (10:23am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Below is the result of your feedback form. It was submitted by

(tlc1196@comcast.net) on Wednesday, April 27, 2005 at 22:40:09

comments: I offer the following as a suggestion and not a complaint about anything that any nuclear facility is doing.

It is rumored that the NRC will be issuing new "regulations" concerning FFD and hours worked. We are just completing an outage and having worked 84 hours for the last three weeks I would say the regulations you have now allow for personnel to work hours over the guidelines, all in accordance with policy. All it takes today is a letter and the ample use of "turnover" time and folks work outside the guidelines. Please do not consider this a complaint but merely an observation, I do not want you to investigate anything I just bring it up as background information.

As it stands today nuclear stations are supplementing their workforce with outside contractor and resource sharing of non-qualified personnel working under "supervision" by qualified personnel. Again, I am not issuing a complaint or making any accusations only stating what the NRC must already know as fact.

So my suggestion is that if the NRC is going to attempt to further limit the hours a person can work, and actually expect those regulations to be followed, then the NRC should mandate the length of an outage. In my opinion mandating a 35 day outage would not unfairly hamper the better performers yet would not cause undue pressure on those who are not top performers.

If the NRC does limit the hours the qualified in house personnel can work but not set a standard outage length that means the companies will further rely on non-qualified or contractor personnel to do critical work. I believe the problems that were and are being experienced at the David Bessie plant and the Perry plants are proof of the desire for profit getting in the way of safety.

Again, this is not a complaint I am only suggesting you set a standard outage length.

organization:

address1:

address2:

city:

state: ---

zip:

country:

phone:

Template = SECY-067

SECY-02

From: Rebecca Karas
To: Evangeline Ngbea
Date: Wed, May 11, 2005 7:59 AM
Subject: Fwd: FFD
Place: OPA1

Evangeline,

Please docket the attached email that came in to OPA as a comment on the Part 26 rulemaking. Carol, as soon as Evangeline gets finished with that and it is declared in ADAMS, please place it on the page of the Part 26 website that has the other comments on it.

Thanks,
Becky

CC: Carol Gallagher; drd; Gregory Smith; gxw; jjp2; OPA1; smc1; tsm5

Mail Envelope Properties (4281F29F.58E : 24 : 20632)

Subject: Fwd: FFD
Creation Date: 5/11/05 7:55AM
From: Rebecca Karas

Created By: RLK@nrc.gov

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Options

Expiration Date:	None
Priority:	Standard
Reply Requested:	No
Return Notification:	None

Concealed Subject:	No
Security:	Standard