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26

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

I am a Control Operator (licensed RO); I work at Point Beach Nuclear Plant. I would like to comment on draft rule part 26 Fitness-for-Duty Program for commercial nuclear power plants. In the draft rule under subpart I Managing Fatigue, 26.199 Work hour controls (d) Work hour controls for individuals (2) discusses adequate rest breaks for individuals. I have a comment concerning (ii) A 24-hour break in any seven day period. The 24-hour break in any seven day period is redundant to the work hour controls for individuals; 72 work hours in any 7-day period [26.199 (d) (1) (iii)]. The work hour controls for individuals is more restrictive than the required rest breaks for individuals, and makes the 24-hour break in any seven day period unnecessary. The required rest break also limits flexibility in scheduling because personnel would require a waiver to work before or after any portion of the schedule where personnel are scheduled 6-days or more days in a row, which occurs three times in the current shift schedule.

If Part 26 is issued in the current draft form, the 8-hour rotating shift schedule used at Point Beach Nuclear Plant will not comply with 26.199 (d) (2) (ii). Both the evening shift (1500-2300) and the night shift (2300-0700) schedule seven days in a row. The following is the 8-hour rotating shift schedule used at Point Beach:

Week	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
1	Off	Days	Relief	Relief	Relief	Relief	Off
2	Off	Training	Training	Training	Training	Training	Off
3	Off	Off	Days	Days	Days	Days	Days
4	Days	Off	Off	Evening	Evening	Evening	Evening
5	Evening	Evening	Evening	Off	Off	Night	Night
6	Night	Night	Night	Night	Night	Off	Off

Days = 0700-1500 Watch standing duties.

Relief = Normally 0700-1500, but personnel can be assigned to Evening or Night shift for vacation coverage.

Training = 0700-1500 Classroom or simulator.

Evening = 1500-2300 Watch standing duties.

Night = 2300-0700 Watch standing duties.

The shift schedule does comply with the remaining limits in the rule (i) A 10-hour break between successive work periods, and (iii) A 48-hour break in any 14-day period. The shift schedule has been used at Point beach for years and is designed to limit impairment from fatigue due to the duration, frequency, and sequencing of successive shifts. The evening and night shifts schedule 56-hours in a seven day period, this is considerably less than what is allowed in the work hour controls for individuals.

Sincerely,
D.M. Jurss

Template = SECY-067

SECY-02

From: Carol Gallagher
To: Evangeline Ngbea
Date: Fri, May 20, 2005 3:30 PM
Subject: Comment on FFD draft rule language

Van,

Attached for docketing is a comment letter on the *Fitness-for-Duty* draft rule language from David Jurss; I received it via the rulemaking website on 5/19/05.

Carol

Mail Envelope Properties (428E3ACC.519 : 2 : 21030)

Subject: Comment on FFD draft rule language
Creation Date: 5/20/05 3:30PM
From: Carol Gallagher

Created By: CAG@nrc.gov

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