

DOCKET NUMBER  
PROPOSED RULE PR 26  
(67 FR 07093)

30

**From:** "D Sancic" <dsancic@jngoli.com>  
**To:** <SECY@nrc.gov>  
**Date:** Tue, Aug 9, 2005 6:54 AM  
**Subject:** NRC PROPOSES FURTHER STRENGTHENING DRUG-TESTING AND WORKER FATIGUE PROVISIONS FOR NUCLEAR WORKERS

The value of adding another position in the fitness for duty process appears to be of little value to the operators of the nations nuclear plants, and appears more to facilitate regulatory oversight. Unless the commission has recent evidence of frequent systematic failures in the fitness for duty process, adding additional layers of bureaucracy is simply adding additional costs. Similarly, unless the commission is finding frequent excessive work hours by staffs that is required by other owners/operators, codifying these requirements provides little value to neither the owners nor the workers. Codifying good management practices is the wrong approach to effective operations.

thank you

David Sancic

DOCKETED  
USNRC

August 9, 2005 (2:00pm)

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RULEMAKINGS AND  
ADJUDICATIONS STAFF

Template = SECY-067

SECY-02

**Mail Envelope Properties** (42F88B45.015 : 7 : 36885)

**Subject:** NRC PROPOSES FURTHER STRENGTHENING DRUG-TESTING  
ANDWORKER FATIGUE PROVISIONS FOR NUCLEAR WORKERS  
**Creation Date:** Tue, Aug 9, 2005 6:53 AM  
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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	711	Tuesday, August 9, 2005 6:53 AM
Mime.822	1825	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None  
  
**Concealed Subject:** No  
**Security:** Standard