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PROPOSED RULE NO. 26
(70 FR 50442)

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3

August 30, 2005 (4:39pm)

From: "Brenda" <bbkkjur@lakefield.net>
To: <fitnessforduty@nrc.gov>
Date: Tue, Aug 30, 2005 10:52 AM
Subject: PBNP schedule

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Rebecca,

I read the federal register Aug 26 for fitness for duty (Vol. 70, No.165). Page 50589 describes work hour scheduling 26.199(c). If I am reading the verbiage correctly; it seems as though my concern with Point Beach's eight-hour shift schedule violating 26.199(d) work hour controls for individuals is unfounded. My concern was the normal shift schedule at Point Beach includes two periods of working 7 consecutive days in a row during the evening and night shift of the schedule. 26.199(d)(2)(ii) requires a 24 hour break in any seven day period, which in my earlier E-mails and conversations appeared to be inconsistent with Point Beach's schedule.

The federal register states: "The maximum work hour and minimum break requirements that are specified in proposed 26.199(d) [work hour controls for individuals] would be intended for infrequent, temporary circumstances, and not as guidelines or limits for routine scheduling." If I am reading this correctly Point beach's schedule need to meet 26.199(c) "in a manner that is consistent with the objective of preventing impairment from fatigue due to the duration, frequency, or sequencing of successive shifts." I believe our schedule meets those objectives, and I suppose that will need to be reviewed by someone from the NRC.

I would like to thank you for the time and effort you have devoted to assisting me with this matter.

Sincerely,
D.M. Jurss

CC: <ddmmjur@lakefield.net>

Template = SECY-067

SECY-02

From: Rebecca Karas
To: Ngbea, Evangeline
Date: Tue, Aug 30, 2005 3:54 PM
Subject: Fwd: PBNP schedule

Please docket the attached email as a comment on the Part 26 proposed rule.

CC: Desaulniers, David; Gallagher, Carol; McCune, Timothy; Persensky, Julius

Mail Envelope Properties (4314B971.80D : 24 : 456)

Subject: Fwd: PBNP schedule
Creation Date: 8/30/05 3:54PM
From: Rebecca Karas

Created By: RLK@nrc.gov

Recipients

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