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**From:** "Dennis Specha" <specha1@sbcglobal.net>  
**To:** <SECY@nrc.gov>  
**Date:** Tue, Nov 22, 2005 9:00 AM  
**Subject:** New Rules

November 22, 2005 (10:01am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

(24)

Dear Sirs,

I am an Operator at Dresden Nuclear Power Station in Morris, Illinois. I am writing to express my concern over the new NRC regulations that are being proposed as an addition to the CFR that governs FFD in Nuclear power plants. My concerns are that the rules will have a negative impact where the proposed changes control hours an employee may work during a week and during outages.

My first concern is the 48-hour equalization rule will cause forcing of personnel to work O.T. when they do not want to. This could come about when there is an illness or absence and other workers may have to work additional hours to cover for the missing employee. In this situation all 'Choice' is removed from the individuals who want to work by only allowing them one extra shift. Additionally, the others may be forced to cover the O.T. slot, on an expected day off, when they were expecting to spend time with their families.

My second concern is that the only feasible way to work an 8-hour a day schedule is to split the midnight shifts to two per 6 week cycle versus going into midnights once and coming out only once. The limit on working only six days in a row create unreasonable demand on personnel too not only swing their bodies from days to nights not once but twice. Anyone who works shift knows how bad this would be on one's biorhythms as well as cause more fatigue while they are at work.

My third concern is that during an outage many people work straight shifts. By limiting employees the outages will inevitably take longer. If an employee is on midnights, taking one day off will serve no purpose but to have them sit up all night while their families are sleeping. No one can swing off a midnight schedule for 24 hours and then go back to work feeling refreshed from their 'day off'.

I hope that you will carefully listen to the workers that will have to live with these new rules. The current rules will not help with worker fatigue and from my perspective they will create fatigue by keeping workers from their families when they want to be home, they deny those who are fit to work from staying because of the equalization of hours provision, they prolong outages and thus keep people away from their family even longer, and they force those who work 8 hour schedules to swing from days to nights twice as often which serves no one when we are all trying to have a workforce that is fit and attentive to protecting the health and safety of the public.

Thank You for your time.

Sincerely,

Dennis A. Specha

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SECY-02

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