

PR 26
(70FR50442)

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From: "RAY WACKER" <ray.wacker@verizon.net>
To: "Rebecca Karas" <RLK@nrc.gov>
Date: Tue, Dec 27, 2005 11:48 PM
Subject: Fw: Proposed Fatigue Rule Changes Fed Register No. 05-108

DOCKETED
USNRC

May 15, 2006 (1:58pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

----- Original Message -----

From: RAY WACKER
To: rbk@nrc.gov
Cc: jeff r davis
Sent: Monday, December 26, 2005 10:25 PM
Subject: Fw: Proposed Fatigue Rule Changes Fed Register No. 05-108

12-26-2005

Attn. Rebecca Karas,
USNRC

Dear Ms. Karas

This is a formal response to proposed rule changes Federal Register No. 05-108 in Fatigue Guidelines 10CFR26. In particular Subpart 1- Managing Fatigue. The major problem is there is a 24 hour break in a 7 day period and the 48 hour break in 14 day period rules (26.199 d2.ii and iii).

We at Beaver Valley Power Station do not work 12 hours shifts. We work 8 hour shifts and these rules seem to be written with 12 hour shifts in mind. Our backshifts are 7 day schedules 8 hours per day and do not exceed 40 hours per calendar week. Although the 7 day rule is important to protect people working 12 hour schedules we don't feel that working 60 hours per week in 7 days causes any undue stress. There is no comparison between working 12 hour days and 8 hour days. I have worked many schedules and do not like any 12 hour schedules. During outages as recently as 10 years ago we could work as few as 56 hrs in a 7 day period. But someone got the bright idea to start working 12 hour days to maximize productivity. Everything changed at that point. Outages are really our only use of 12 hour shifts.

Anyway, during normal work periods (non-outage) we prefer 8 hour shifts. It is the feeling of the workers at the station not to work 12 hour shifts. This being said 60 hours per week in a 7 day period is not an excessive work schedule. We DO NOT WANT TO BE PUSHED INTO 12 HOUR SCHEDULES! As IBEW Local 29 Executive Board Member representing Operators, Rad Protection, and all Maintenance disciplines I am stating that we do not want 12 hour shifts. I have saved all the e-mails from my members when the company attempted to instate regular 12 hour shifts telling me that unequivocally that they did not want them.

12 hour shifts up to 6 days a week are brutal to say the least. The 1 or 2 offdays you get are needed to recover from them. However 8 hour or even 10 hours not to exceed 60 hours per week allow you to maintain a normal lifestyle that 12 hours do not!

This is why those on 8 hour work day normal shifts are hurt by these guidelines. It protects 12 hour shift people but hurts 8 hour shift workers. All that needs to be added is the 7 days in a row is acceptable providing that no more than 60 hrs are worked per week.

You would have received more individual e-mails from BVPS had not the following occurred: 1st we were involved in a long negotiations effort this fall and did not get this info to our members and 2nd the company e-mail was down thru much of December due to problems with a new system and they were not able to read their e-mail.

Anyway other than those to sections of the guidelines in 10CFR26 the proposed changes seem acceptable.

Sincerely,

Ray Wacker

Template = SECY-067

SECY-02

IBEW Local 29
and BVPS worker

Executive Board

From: Rebecca Karas
To: Desaulniers, David; Diec, David; McCune, Timothy; Persensky, Julius
Date: Wed, Dec 28, 2005 7:23 AM
Subject: Fwd: Fw: Proposed Fatigue Rule Changes Fed Register No. 05-108

Here is another comment. Please have Evangeline docket.

From: David Desaulniers
To: Ngbea, Evangeline
Date: Fri, May 12, 2006 12:06 PM
Subject: Fwd: Fw: Proposed Fatigue Rule Changes Fed Register No. 05-108

Evangiline -

It appears to me that the attached e-mail comment on the rule was never docketed as a formal comment on the rulemaking. Would you please add it to the proposed rule comments. Thanks.
Dave

CC: Collier, John; Diec, David

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Subject: Fwd: Fw: Proposed Fatigue Rule Changes Fed Register No. 05-108
Creation Date: 5/12/06 12:06PM
From: David Desaulniers

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