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Subject: Fatigue rule

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Rulemakings and Adjudication Staff,

The push on this ruling needs to slow down and get looked at from other viewpoints. There seems to be an urgency to get it through without a thought on the impact. For the industry the number of new workers that will be needed far out weighs the supply. Some will claim that there is a supply from the Navy. That will only be a drop in the bucket for the supply that will be needed. The implementation of any changes needs to be phased in gradually to give the workforce time to catch up and adjust. To give a drop dead time frame will be unrealistic and unfair.

The belief that this ruling will help prevent errors is unfounded. This rule will in fact increase errors and lower the quality of work. What will come out of this will be a rush to get the job done or not do it at all, because we can't stay over to do it right.

The response of how mistakes generally occur on night shifts may be somewhat true but this rule or any other will not do anything to prevent that. Producing power is a round the clock job. Circadian rhythm is mentioned but nothing will prevent us from having night shift workers. The sleep studies need to be left out of this discussion. Whether I work, eight hours or twelve, five days or seven, I get the same amount sleep. The studies are not done directly with the workers in our industry.

I have stated before and I will again. This ruling is an operating department concern. As an outage worker (fuel handling) I am not subject to rotating shifts and weekend work other than outages. Non-outage time I am on zero overtime. I usually work three outages per year each about three to four weeks long. We do work seven days per week in that time frame. In Illinois there is a law that requires an employer to offer the worker one day off in seven. During these outages there are no takers. Everyone volunteers to be here.

Personally this rule is going to be a disaster for me. I have worked the same overtime for over eighteen years. Right or wrong I have based my plan on this overtime. My retirement plans have been based on some of this money. I planed on retiring at fifty-five. This rule will extend that out to at least sixty unless I find some other way to make up the difference now. I have already started discussions with my wife over money. Second jobs or business ventures are being considered. Neither of which can be as profitable or stress free as doing what I do now and know best. The stress I am feeling over this rule is greater than any overtime I have ever worked. Others I have discussed this rule with are also fearful. Some have house payments that will be tough to meet. Others have their children's college tuitions to worry about.

You are only hearing from the squeaky wheels on this subject. Most are in denial as to this rule affecting them. They think they will be able to continue to work the overtime they have been getting. Others feel that their opinion will not make a difference and do nothing.

Please rethink this rule and go to all the nuclear workers that work overtime, study them, and get their opinions.

Thank you,
Daniel Hansen

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