

**PR 26**  
**(70FR50442)**

January 17, 2007



PROFESSIONAL  
REACTOR  
OPERATOR  
SOCIETY

The Honorable Dale E. Klein  
Chairman  
U.S. Nuclear Regulatory Commission  
Mail Stop O-16 C1  
11555 Rockville Pike  
Rockville, MD 20852

DOCKETED  
USNRC

January 25, 2007 (4:45pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**SUBJECT:** Draft 10CFR Part 26 Fitness for Duty

Dear Chairman Klein:

Worker fatigue is an issue many industries face. Corporations have reduced the work force to increase profits and shareholder dividends without concern for the chronic effects of fatigue on the work force. The nuclear industry has been subject to the same evolution. What is different about the nuclear industry that separates us from the rest of commerce? It is commonly known that the nuclear industry is aging. This means that physically, nuclear plant operators are slower to recuperate from changing shift rotations every 5-7 days and less receptive to disruptions in a daily life schedule. Several studies have been performed which contradict the position of NEI as published in a December 21, 2006 letter to the NRC. Chronic fatigue affects each operator who works long hours covering shifts for persons on vacation or to supplement crews as a result of the shortage of qualified Nuclear Plant Operators around the country. The industry does not want to accept worker fatigue as an issue because it would mean hiring and training additional Nuclear Plant Operators to allow for the recuperation of the current staff. The issue of worker fatigue was raised by a Licensed Reactor Operator and validated by doctors and scientists as a severe issue for shift-workers working 12-hour days for extended periods of time. The Operators are not performing menial jobs. They are making decisions daily which affect the health and safety of our public, sometimes after working more hours than the federal government allows truck drivers to be on the road. The Professional Reactor Operator Society has conducted extensive surveys with our members and has provided the results to the NRC. These surveys support the fact that the Nuclear Reactor Operators and Supervisors feel that fatigue resulting from extended work hours affect their decision-making and the operation of the Nuclear Power Plants in the United States.

The Professional Reactor Operator Society is in full support of the NRC Fatigue Rule as written and emphatically object to the letter issued to the NRC Commission by Mr. Marvin S. Fertel dated December 21, 2006. This rule will ensure safe operation of our country's nuclear power plants by highly trained, focused and alert operators.

We encourage you to approve the 10CFR Part 26, Fitness-for-Duty ruling as written.

Sincerely,

Douglas R. Foster

President, Professional Reactor Operators Society

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