

OFFICE OF THE SECRETARY  
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Chairman Gregory B. Jazcko  
U. S. Nuclear Regulatory Commission  
Washington D.C. 20555-001

August 11, 2009

Dear Chairman Jazcko:

I know the official period for comments on the new Fatigue Rule has been closed, but now that my plant has started enforcing the new rules, I wonder how life is going to be better for the people it will affect the most...the workers. After all, this was supposed to be about us, wasn't it?

Here at Beaver Valley, labor contracts that have been in place for years are being ignored and changed without negotiation on a daily basis. Agreements on scheduling practices have been changed by the company and the only reason given is "It's due to the fatigue rule."

Workers who never wanted to work overtime, and really never had to very often, are now routinely being required. Workers who wanted the overtime cannot work it now. Schedules are being changed by the company from week to week, along with changing people's relief days to fill vacant schedules....so now we do not have any idea when we will have a weekend off. We cannot make long range plans. Starting times are being changed to avoid paying penalties. I may work an afternoon shift that starts at 1530 this week and 1300 next week.

Now that the rules are so restrictive, vacation on a back shift is now mostly a thing of the past. The company is denying almost all requests for vacations because it is too hard to fill them without penalties. What this means is....that if I need a day off for a family function or I just need some time away....I will be denied that request because of what it takes to fill my vacancy. We also used to be able to trade shifts on any given day to help each other out, but that has gone by the wayside as well now. The company has to pay too much of a penalty for that to happen.

The company has already said they are NOT going to hire any more people. In fact, their projections show less people in the next five years.

My history with the Fatigue Rule and it's implications go back several years. I am Steward and attended the IBEW Nuclear Conference several years ago in Las Vegas. A representative from the NRC attended and gave a presentation on the proposed rules. Within minutes after it was over, several issues were seen as potential problems and dozens of Union Representatives expressed their concerns with the new rules. In my opinion, the NRC has had tunnel vision when it came to this issue. The problems we pointed out back then have now come to fruition. My days now usually start by having to go in and fight to get someone a vacation day that was denied, or having to spend 20 minutes or so explaining to them why they have to change shifts and their relief days for the next two weeks.

We may now work less because of the rules, but the level of frustration, anger and stress has gone up tenfold. The number of people being forced on shifts has gone up at least 500%. The quality of family life is suffering because no one knows when their relief days are going to change and/or what shift they will be working at any given time. While my relief days have only been changed for a two week period so far, several of my co-workers have now had to work five weekends in a row. Not much of a summer considering we have two outages of our own this year and supported one at Perry.

I could go on and list several other issues, but I hope that this gives you an idea of what is happening in the field. Our plant just recently received our first INPO 1 rating. With everything that has happened since implementation of the new rules, I don't see us keeping it for very long. I hope that someone within the NRC will rethink the Fatigue Rules and come up with something that is a lot easier to manage.

Sincerely,

A handwritten signature in black ink, appearing to read "William S. Patterson", with a long, sweeping horizontal stroke extending to the right.

William S. Patterson