

Rulemaking Comments

From: Kempkes, John C. [John.Kempkes@xenuclear.com]
Sent: Thursday, December 10, 2009 10:04 PM
To: Rulemaking Comments
Subject: Comment on 10CFR26 PRM-26-3 NRC-2009-0482

I am writing in support of the proposed rule change. We recently completed an outage at a dual-unit site with a common control room as described in the petition. The need to maintain separate schedules for the "online" unit and "outage" unit created administrative and rotational difficulties that are not justified by any improved rest time. The online personnel were put into a minimal-staffing condition for the outage to allow all other personnel to support the outage. This resulted in a schedule that complied with the online rules, yet was the worst outage schedule I had worked for fatigue due to swapping back and forth each week between day and night shift. It also hindered the ability to support time off requests and sick calls due to the need to maintain "online" hours. When one unit is in an outage, the whole site is in an outage.

I also agree with extending the time for the defined outage hours. To support rotation onto and off of outage schedules, plus support training and pre-outage work and equipment testing, it is important to have Operations personnel available for support. The proposed rule would allow for proven practices that in the end reduce the outage burden.

John Kempkes
Shift Manager
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DOCKETED
USNRC

December 11, 2009 (9:50am)

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To: "'rulemaking.comments@nrc.gov'" <rulemaking.comments@nrc.gov>
Date: Thu, 10 Dec 2009 21:04:17 -0600
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Thread-Topic: Comment on 10CFR26 PRM-26-3 NRC-2009-0482
Thread-Index: Acp6DqAzRkZoZLb2SHaxSFYvO0/JvA==
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