

PRM-26-5
(75FR65249)

PUBLIC SUBMISSION

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Docket: NRC-2010-0304
Nuclear Energy Institute - Fitness-for-Duty Programs

Comment On: NRC-2010-0304-0001
Anthony R. Pietrangelo on Behalf of the Nuclear Energy Institute; Receipt of Petition for Rulemaking

Document: NRC-2010-0304-DRAFT-0002
Comment on FR Doc # 2010-26715

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USNRC

October 27, 2010 (4:00pm)

Submitter Information

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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Submitter's Representative: None

Organization: None

General Comment

I am a licensed SRO at Callaway Nuclear Plant. I am submitting these comments as an individual licensed operator and not on behalf of the Callaway Station.

I support the NEI proposal. The MDO portion of the rule change for Part 26 Subpart I has been an administrative overload to implement.

Callaway had a supervisor violate the MDO when he was called in for a 1 hour meeting on a short notice. When he put his hours worked in the computer tracking system he realized that this 1 hour meeting resulted in a violation. The MDO calculation is too complicated for an individual to track without the aid of a computer program.

Another situation involved working more overtime by working a shortened day in a strategic time during the work cycle allowed individuals at least two more 12 hour shifts of overtime and one individual three days of additional 12 hour shifts. This was acceptable per the MDO and each of these individuals worked in excess of the 54 hour average for the work cycle.

Both of these examples demonstrate a flaw with the MDO portion of the Work Hour limitations. One demonstrated the complexity of implementation mandating the use of a computer program for implementation. The other showed, with strategic work hour manipulation, a large amount of overtime can still be worked. I heard one person say they feel they are actually getting more overtime now than before the rule change.

Again, I support the recommended change to simplify the implementation so a computer program is not required to verify compliance and a stricter review of the 54 hour average to curb abuse.

Template = SECY-067

DS 10

Rulemaking Comments

From: Gallagher, Carol
Sent: Wednesday, October 27, 2010 11:29 AM
To: Rulemaking Comments
Subject: Comment on PRM-26-5
Attachments: NRC-2010-0304-DRAFT-0002.pdf

Van,

Attached for docketing is a comment on PRM-26-5 (75 FR 65249) that I received via the regulations.gov website on October 26, 2010.

Thanks,
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.76]) by TWMS01.nrc.gov
([148.184.200.145]) with mapi; Wed, 27 Oct 2010 11:29:07 -0400
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