

From: Ernest Lee [vidar707@tampabay.rr.com]
Sent: Friday, October 29, 2010 12:26 AM
To: Rulemaking Comments
Subject: Docket ID NRC-2010-0304

November 1, 2010 (9:41am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Concerning the proposed change to the 10 CFR 26 guidelines, as described in Docket ID NRC-2010-0304, I strongly disagree with relaxing the restrictions for nuclear shift workers. Understand that the average age of the nuclear work force is getting older, and as such adjustment to rotating shift hours, 12-hour days, and off-shift coverage of the watchbill due to understaffing takes it's toll on the individual, not to mention the family.

As a shift worker in the nuclear power industry for nearly 25 years, I have experienced rotating 6-crew 8 hour shifts, 5-crew 8 hour shifts, and 5-crew 12 hour shifts (the current rotation at most commercial facilities). The latter 12 hour shift originally was desirable due to the built-in days off, but due to employee attrition from job changes, company changes and retirement half of the previously scheduled 'off' days no longer exist. Having interacted with contract personnel that travel between nuclear plant outages, this is a recurring theme among commercial facilities.

As a person who follows the aviation industry, and having used studies on fatigue conducted by NASA and the FAA during safety meetings, I feel that relaxing the current 10 CFR part 26 restrictions would be a step backwards concerning nuclear safety for the public.

Aside from public safety, in the period before the current part 26 rules, I have witnessed many health conditions related to the stress of over-work, divorces due to rotating schedules impacting home life, and an increase in alcohol related instances involving co-workers and local law enforcement. Relaxing part 26 would only affect the individual worker and the public's safety in a negative manner.

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