From:	Davis, Webster E [WDavis3@ameren.com]
Sent:	Tuesday, November 30, 2010 6:17 PM
To:	Rulemaking Comments
Cc:	Dumbacher, David; Groom, Jeremy (NRC)
Subject:	Proposed Rule PRM 26-6; NRC-2010-0310.

DOCKETED
USNRC

December 1, 2010 (8:16am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary, U.S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001
ATTN: Rulemakings and Adjudications Staff:
Rulemaking.Comments@nrc.gov

November 30, 2010

Honorable Secretary:

I have read the proposed rules Summary for Docket No. PRM 26-6; NRC-2010-0310. The petitioner (Mr. Erik Erb) and 91 co-signers have proposed a reasonable modification to NRC regulations.

Specifically, that the NRC amend it's Minimum Day Off (MDO) requirements for Security Officers working 12 hour shifts from an average of 3 days per week to 2.5 or 2 days per week.

As a Security Officer with 27 years of experience, I know that a 2-day (MDO) per week should be the requirement. Currently under the NRC mandated 3-day (MDO) per week requirement, one is required to be off 15 days in a rolling 5 week schedule. Allowing Security personnel the same latitude that Maintenance personnel enjoy would allow a Security Officer to increase their income substantially without any negative effects upon the welfare and safety of the public.

With the increase in Fatigue Management awareness and the steps that the Callaway Plant has implemented to alleviate and mitigate this issue, it is proper and fitting that this rule be amended.
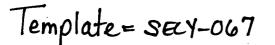
Some of the steps we use to mitigate fatigue management issues include the following:

Hourly status/well-being checks
Mandatory Supervisory checks
Exercise equipment at various static posts
Computer use allowed and encouraged
Rotating between static post and patrols

We have not had an issue with Security personnel sleeping on the job; since these steps have been in place and we have a rigorous program in place to monitor mandatory days off.

Sincerely;

Webster E. Davis
P.O. Box 620
Fulton, MO. 65251

Template = SECY-067

DS 10

Webster Davis
Armed Nuclear Security Officer
Callaway Diversity Co-Chair
Callway Coordinator for Discovery Newsletter
AMVE member

Received: from mail1.nrc.gov (148.184.176.41) by OWMS01.nrc.gov
(148.184.100.43) with Microsoft SMTP Server id 8.1.393.1; Tue, 30 Nov 2010
18:16:55 -0500
X-Ironport-ID: mail1
X-SBRS: 3.9
X-MID: 27517906
X-IronPort-Anti-Spam-Filtered: true
X-IronPort-Anti-Spam-Result:
AmsCAPYU9UzYILQOi2dsb2JhbACCAqEgAQEBCgsKBw8FGQaqFpI8hUcEgVyDAIkbFA
X-IronPort-AV: E=Sophos;i="4.59,282,1288584000";
  d="scan'208,217";a="27517906"
Received: from va3ehsobe004.messaging.microsoft.com (HELO
VA3EHSOBE004.bigfish.com) ([216.32.180.14]) by mail1.nrc.gov with ESMTP; 30
Nov 2010 18:16:55 -0500
Received: from mail83-va3-R.bigfish.com (10.7.14.248) by
VA3EHSOBE004.bigfish.com (10.7.40.24) with Microsoft SMTP Server id
14.1.225.8; Tue, 30 Nov 2010 23:16:55 +0000
Received: from mail83-va3 (localhost.localdomain [127.0.0.1])   by
mail83-va3-R.bigfish.com (Postfix) with ESMTP id BEFA4C40509;   Tue, 30 Nov
2010 23:12:14 +0000 (UTC)
X-SpamScore: 0
X-BigFish: VPS0(zzzz1202hzz8275dhz2dh691h668h67dh61h)
X-Spam-TCS-SCL: 0:0
X-Forefront-Antispam-Report:
KIP:(null);UIP:(null);IPVD:NLI;H:dssmta.ameren.com;RD:none;EFVD:NLI
Received: from mail83-va3 (localhost.localdomain [127.0.0.1]) by mail83-va3
(MessageSwitch) id 1291158733808187_7938; Tue, 30 Nov 2010 23:12:13 +0000
(UTC)
Received: from VA3EHSMHS013.bigfish.com (unknown [10.7.14.253])   by
mail83-va3.bigfish.com (Postfix) with ESMTP id C149096004E;   Tue, 30 Nov 2010
23:12:13 +0000 (UTC)
Received: from dssmta.ameren.com (199.38.133.26) by VA3EHSMHS013.bigfish.com
(10.7.99.23) with Microsoft SMTP Server id 14.1.225.8; Tue, 30 Nov 2010
23:16:53 +0000
Received: from dssmta.ameren.com ([127.0.0.1]) by dssmta.ameren.com with
Microsoft SMTPSVC(6.0.3790.4675);   Tue, 30 Nov 2010 17:16:53 -0600
Received: from outbound.ameren.com ([10.200.32.44]) by dssmta.ameren.com with
Microsoft SMTPSVC(6.0.3790.4675);   Tue, 30 Nov 2010 17:16:53 -0600
From: "Davis, Webster E" <WDavis3@ameren.com>
To: "Rulemaking.Comments@nrc.gov" <Rulemaking.Comments@nrc.gov>
CC: "Dumbacher, David (NRC)" <David.Dumbacher@nrc.gov>, "Groom, Jeremy (NRC)"
      <JGroom@ameren.com>
Date: Tue, 30 Nov 2010 17:16:49 -0600
Subject: Proposed Rule PRM 26-6; NRC-2010-0310.
Thread-Topic: Proposed Rule PRM 26-6; NRC-2010-0310.
Thread-Index: AcuQ5Kpzp5UpmvPLQ9WoalHWBnX+gA==
Message-ID:
<BE753406A3C6734B92286A3A848D9A3601AFB92653@exchcal1.corp.dir.ameren.com>
Accept-Language: en-US
Content-Language: en-US

X-MS-Has-Attach:
X-MS-TNEF-Correlator:
acceptlanguage: en-US
Content-Type: multipart/alternative;

boundary="_000_BE753406A3C6734B92286A3A848D9A3601AFB92653exchcal1corpd_"
MIME-Version: 1.0
X-OriginalArrivalTime: 30 Nov 2010 23:16:53.0007 (UTC) FILETIME=[AC6EB1F0:01CB90E4]
Return-Path: WDavis3@ameren.com
X-OriginatorOrg: ameren.com