

**Rulemaking Comments**

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**From:** Pettus, David W [DPettus@ameren.com]  
**Sent:** Sunday, December 05, 2010 7:12 AM  
**To:** Rulemaking Comments  
**Subject:** Minimum Days Off

DOCKETED  
USNRC

December 6, 2010 (9:33am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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;  
David W. Pettus 15251  
Nuclear Security Officer  
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