

DOCKETED
USNRCPRM-26-5
(75FR65249)

December 23, 2010 (8:35am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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PUBLIC SUBMISSION

As of: December 23, 2010
Received: December 22, 2010
Status: Pending_Post
Tracking No. 80bbded7
Comments Due: January 05, 2011
Submission Type: Web

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-0011
Comment on FR Doc # 2010-26715

Submitter Information

Name: J Leslie Troth
Address: United States,

General Comment

The petition essentially voids current MDO requirements. Leaving the remaining language as suggested will likely result in one of two MDO scenarios. (1) Those Plants that choose to function with 12-hour schedules will become a "one day off per week" Plant to comply with the 72/168 rule. (2) Those Plants that function on 8's or 10's will begin to appear as a "one day off every 9" to comply with the 34 hour break every 9 days rule.

Using my knowledge of my Plant's behaviors & true commitment to the rule, I cannot support the concept of industry-wide fatigue management based on performance criteria, self-monitored, against an average 54 hours per week. There has certainly NOT been sufficient regulatory oversight/inspection/review to conclude any Site's corrective action program is effectively resolving the already identified failures to meet this requirement.

"Unintended Consequences?" Sounds more like "smoke & mirrors".

Thanks for the opportunity to comment.

Template = SECY-067

DS 10

Rulemaking Comments

From: Gallagher, Carol
Sent: Thursday, December 23, 2010 8:19 AM
To: Rulemaking Comments
Subject: Comment on PRM-26-5
Attachments: NRC-2010-0304-DRAFT-0011.pdf

Van,

Attached for docketing is a comment from J. Leslie Troth on PRM-26-5 that I received via the regulations.gov website on 12/22/10.

Thanks,
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by OWMS01.nrc.gov
([148.184.100.43]) with mapi; Thu, 23 Dec 2010 08:18:57 -0500
Content-Type: application/ms-tnef; name="winmail.dat"
Content-Transfer-Encoding: binary
From: "Gallagher, Carol" <Carol.Gallagher@nrc.gov>
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>
Date: Thu, 23 Dec 2010 08:18:57 -0500
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