

From: Ronald.Vanderhyden@exeloncorp.com
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Docket ID NRC-2010-0304

I'm glad to have the opportunity to address the recent changes to work hour rules for covered nuclear workers. As a part of LaSalle Station's operations department, the rules have had a considerable impact on my life already, and I have found that I was not nearly the only person hoping to have such a chance to petition for their revision or removal. I'd like to illustrate why I think the changes have been completely counterproductive, and need to be revisited.

First, the rules are much more complicated than they were previously, and simply dealing with the rules daily has become a burden on the workforce. What used to be a simple task of performing an emergent callout now requires the aid of a complex computer program to ensure that potential overtime recipients are not in violation of the requirements. When the rules did not extend to cover over any length of time greater than a rolling seven days, they were easily manageable. Now, however, with rules covering concerns over a rolling nine days, and averages over a six week cycle on top of the earlier restrictions, we often find ourselves being told by the computer that we are ineligible to work a shift and puzzling over the reason why. Instead of providing a guideline by which we can keep ourselves well rested and focused on our important jobs, the changes have added an extra dose of administrative labor to our time on shift and even at home as we continuously have to reevaluate what shifts we can cover, and be required to cover for others.

The prior rules were simple and straightforward. Each of us was easily able to familiarize ourselves with them and understand how to follow them. The new rules should be condensed into something that we can all follow along with, without them becoming obstacles to our performance.

The complicated nature of the new rules sometimes even reaches the point of absurdity. One particularly ridiculous example of the rules in action has come up a few times at LaSalle, where an individual

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has been in position to violate the rules by taking a day off of work. Since different numbers of days off are required to be given for a worker depending upon the average hours worked per shift over a six week cycle, the number of days off needed for the cycle can change in the middle of a cycle as the average of hours per shift fluctuates in response to our constantly changing schedules. This means that when conditions are right, a person can reach the last day of cycle in compliance with the rules, but would violate if he or she attempted to take the day off if by doing so it would raise his or her average above the threshold requiring more days off over the cycle that it is now too late to get.

The possibility of the above scenario is a bizarre circumstance to be allowed by work hour rules that are meant to keep us well rested. It should never be possible to break the rules for keeping us well rested by taking a day off to rest. Therefore, any rule regarding the number of days off to be achieved during a cycle need to either be unified to one rule in effect no matter what variances there are in a worker's schedule, or eliminated entirely if they are to make any sense.

Perhaps the most prominent effect of the changes is that the amount of overtime each person works is largely equalized. People that want to work larger amounts of overtime are unable to do so because the new rules limit them. Meanwhile, workers that do not want to work the extra hours have found themselves required to come in more frequently to account for the hours that their peers no longer are capable of covering. As a result, the very workers that should be embracing limits on their time at work are now at work more than ever.

This inevitable phenomenon is thus negative for everyone involved. Those that prefer to work more hours make less money. I know this is not the NRC's concern and it shouldn't be. However, it's unfair to discount this fact as a part of the larger picture the work hour rules have created. Combine this fact with the other reality of more employee forces for those that didn't want to work the overtime hours in the first place (which should certainly be of some concern), and it becomes readily apparent why virtually all employees of the industry have been resistant to the changes. In short, whichever goal a worker has, the changes to the work hour rules invariably act in direct opposition of what he or she wants.

The changes have completely stymied personal autonomy, and eliminate our ability to make our own adult and informed decisions about what we personally need for rest. The workers employed in this industry

constitute a very diverse group. It's unfair to create a set of rules that give them such little input into their working situation, and force them all into the same situation. This lack of choice in the matter frustrates workers more than anything else. A good compromise would be to make some of the rules only apply to forces. For example, it could be allowable for a person to work nine days without a thirty four break, but to mandate that no one be forced to do so. This allows for the able and willing to work more of the hours they want, while ensuring those that truly need the rest the NRC seeks to provide with these rules are able to get it. The alternative of not allowing at least some of these types of choices to be made by the workers is the current situation where those that need the rest most are the ones at work enduring the brunt of the negative impact brought down by changes.

While it may be necessary for the NRC to set certain limits on the amount of time a worker spends onsite, these restrictions must be tempered by the acknowledgment of certain facts about the working environment. Any rules have to be reasonable and simple enough to be manageable for groups of workers that are going to be on shift dealing with them everyday. They have to truly reflect the goals claimed by their mandate, to ensure that the work force is rested enough to safely perform its work. Most importantly, they have to allow the freedom for workers to distribute the workload amongst themselves according to their ability to handle it. The rules as they are currently written have failed in all three of these regards, and as such have become far more of a barrier to safe operation of nuclear plants than a help. Hopefully, with this dilemma in mind, I implore the NRC to reconsider its position, and reevaluate the impact of the work hour rules on the nuclear industry.

Sincerely,

Ron Vanderhyden

Equipment Operator, LaSalle Country Nuclear Station

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Sincerely,

Ron Vanderhyden

Equipment Operator, LaSalle Country Nuclear Station

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