

Rulemaking Comments**PRM-26-5
(75FR65249)**DOCKETED
USNRC

16

From: michael.mulka@exeloncorp.com
Sent: Wednesday, December 29, 2010 2:40 PM
To: Rulemaking Comments
Subject: RE: NEI Petition NRC-2010-0304

December 29, 2010 (3:00pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

I am a Nuclear Station Operator at LaSalle Nuclear Station, Exelon Nuclear. I have read the NEI's petition (NRC-2010-0304) to change the NRC Work Hour Rules (WHR), and strongly urge the NRC to implement the changes requested. I realize that the WHR were meant to reduce fatigue among nuclear workers, but the current iteration has actually increased fatigue levels for many of us, for a number of reasons.

Everyone does not have the same level of tolerance for working additional hours. Whether due to youth, health, or general physical condition, some people can simply work more hours in any particular period than others. However, the current WHR inevitably result in these workers being allowed to work less overtime than they can reasonably tolerate, while workers less able (and so less willing) to work additional work hours are actually forced to work more hours to fill the void. This inflexibility noticeably increases fatigue levels for many nuclear workers.

Additionally, the current WHR are overly complex and require a computer program to decipher them and ensure compliance. We at Exelon Nuclear are told we are responsible for our own compliance with the WHR, which is virtually impossible for an individual to do with any degree of reliability.

Also, the current structure of the WHR results in abnormal work schedules. Specifically, the 10-hour and 34-hour rules, which do not mesh with any 8-hour or 12-hour shift schedule. These often result in disjointed, partial, off-standard overtime shifts in order to fill the shift slots, since full shifts will not comply with the 10-hour and 34-hour rules. Simply relaxing these rules (and most especially the 34-hour rule) by 2 hours would alleviate many issues.

In summary, I believe that implementing the NEI's proposed changes would result in less actual fatigue among nuclear workers, and I strongly urge the NRC to consider doing so ASAP.

Thank you,
Mike Mulka
Nuclear Station Operator
LaSalle County Nuclear Station
Exelon Nuclear

***** This e-mail and any of its attachments may contain Exelon Corporation proprietary information, which is privileged, confidential, or subject to copyright belonging to the Exelon Corporation family of Companies. This e-mail is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this e-mail is strictly prohibited and may be unlawful. If you have received this e-mail in error, please notify the sender immediately and permanently delete the original and any copy of this e-mail and any printout. Thank You. *****

Received: from mail1.nrc.gov (148.184.176.41) by OWMS01.nrc.gov
(148.184.100.43) with Microsoft SMTP Server id 8.2.247.2; Wed, 29 Dec 2010
14:39:43 -0500

X-Ironport-ID: mail1

X-SBRS: 5.3

X-MID: 28719848

X-IronPort-Anti-Spam-Filtered: true

X-IronPort-Anti-Spam-Result:

AIMBAJsdG03GHe4FmWdsb2JhbACCIqIvAQEBAQEICwoHESS/EIVKBIRliUI

X-IronPort-AV: E=Sophos;i="4.60,245,1291611600";
d="scan'208,217";a="28719848"

Received: from mailwest.ceco.com (HELO ceco.com) ([198.29.238.5]) by
mail1.nrc.gov with ESMTP; 29 Dec 2010 14:39:43 -0500

Received: from ([10.121.132.83]) by ccclxsecure01.ceco.com with ESMTP id
1xh9wh1.141832165; Wed, 29 Dec 2010 13:39:39 -0600

Received: from CCCMSCON02.energy.power.corp ([130.197.106.102]) by
CCCMSWSMTP01.energy.power.corp with Microsoft SMTPSVC(6.0.3790.4675); Wed,
29 Dec 2010 13:39:38 -0600

Received: from cccmsxch17.energy.power.corp ([130.197.160.45]) by
CCCMSCON02.energy.power.corp with Microsoft SMTPSVC(6.0.3790.4675); Wed, 29
Dec 2010 13:39:38 -0600

X-MimeOLE: Produced By Microsoft Exchange V6.5

Content-Class: urn:content-classes:message

MIME-Version: 1.0

Subject: RE: NEI Petition NRC-2010-0304

Date: Wed, 29 Dec 2010 13:39:38 -0600

Message-ID:

<66503D0CD45C4E499EE48533D9CEED49756205@cccmsxch17.energy.power.corp>

X-MS-Has-Attach:

X-MS-TNEF-Correlator:

Thread-Topic: RE: NEI Petition NRC-2010-0304

thread-index: AcunkCEED+3oMdRhQYWuU7GAg4Tdlg==

From: <michael.mulka@exeloncorp.com>

To: <Rulemaking.Comments@nrc.gov>

Return-Path: michael.mulka@exeloncorp.com

X-OriginalArrivalTime: 29 Dec 2010 19:39:38.0770 (UTC) FILETIME=[2166B720:01CBA790]

Content-Type: multipart/alternative;
boundary="----_=_NextPart_001_01CBA790.211EADB8"