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Sent: Thursday, December 30, 2010 2:15 PM
To: Rulemaking Comments
Subject: Docket ID NRC-2010-0304

December 30, 2010 (2:30pm)

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

I'm glad to have the opportunity to address the recent changes to work hour rules for covered nuclear workers. I'd like to illustrate why I think the changes have been counterproductive, and need to be revisited. I would also like to make recommendations as to how we could make the WHR's better and still safe for all of us.

First, there should never be a set of rules that makes you violate WHR's when you take more time off. If you are on an 8 hr schedule or Hybrid and you work some overtime at the beginning of the cycle with some 8 hr days at the end of the cycle to keep you below the 10 hr worker and then you need a day off at the end of the cycle for a death in the family or because you are sick you could violate WHR by taking that day off because your average now makes you a 10 hr worker and you need more days off that cycle. How does this help us become more rested? How can you possibly tell someone sorry we want to make sure you are getting enough rest so you have to work today you can't stay at home. It makes no sense and at a minimum should be changed so that you are either always a 8 hr worker if you are on an 8 hour/ Hybrid schedule or always a 12 hour worker if you are on a 12 hr schedule.

Second, the number of last minute forces in the operations department has skyrocketed. It may not look like it on paper because there is usually someone who will take the force last minute to be a nice guy especially if someone else had plans, but make no mistake they don't want to be here and there is usually someone who does want to be here. The people that want to be here aren't allowed to stay sometimes because of a few days of overtime they had 5 weeks ago, and instead of being allowed to work, we have to force someone who doesn't want to be here. We should never have a 6 week cycle that prevents you from working 1 day in the middle of your 6 days off (on hybrid schedule) because you worked some hours 3, 4, or 5, weeks ago. Having two days

off then coming to work for one then having 3 days off is plenty of rest for me. I don't need more rest because 5 weeks ago I worked some overtime. A solution to this would be to base things on a weekly schedule. Make the minimum rest requirement at least one day off per week.

Third, it is way too complicated to figure out if you are allowed to work or not. If we had a one day off per week rule this would eliminate the hassle of a computer program to see if we are able to work something and hoping the person checking doesn't make any mistakes putting the hours in the program. Only one or two people check this in the computer to see if you are violating. If we had a simple rule such as you must have one day off per week, it would be easy for an operator to check if they meet this requirement. It would then take less than 5 minutes to peer check every operator has met this requirement just by opening up the call-outs for the week.

I would like to thank you for the opportunity to express how I feel about the new WHR's and would like to end by one more time recommending the following rules replace the current WHR. 1. You are either always an 8 hr worker if you are on an 8 hour/ Hybrid schedule or always a 12 hour worker if you are on a 12 hr schedule instead of changing back and forth based on how many hours you work in a cycle. 2. Ensure we get 1 day off per week instead of basing days off on a 6 week cycle. We can still keep the 72hrs a week, and 10hrs between shifts if you feel it helps with ensuring we have enough rest, but please make it less complicated so that we can look at our hours and tell if we violate WHR's without the aid of a computer program.

Thank You

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Received: from mail1.nrc.gov (148.184.176.41) by TWMS01.nrc.gov
(148.184.200.145) with Microsoft SMTP Server id 8.2.247.2; Thu, 30 Dec 2010
14:15:01 -0500
X-Ironport-ID: mail1
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X-MID: 28753157
X-IronPort-Anti-Spam-Filtered: true
X-IronPort-Anti-Spam-Result:
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d="scan'208,217";a="28753157"
Received: from webmail.exeloncorp.com (HELO ceco.com) ([198.29.238.5]) by
mail1.nrc.gov with ESMTP; 30 Dec 2010 14:15:01 -0500
Received: from ([10.121.132.83]) by cclxsecure01.ceco.com with ESMTP id
1xh9wh1.141982672; Thu, 30 Dec 2010 13:14:59 -0600
Received: from CCCMSCON01.energy.power.corp ([130.197.106.20]) by
CCCMSWSMTP01.energy.power.corp with Microsoft SMTPSVC(6.0.3790.4675); Thu,
30 Dec 2010 13:14:58 -0600
Received: from cccmsxch13.energy.power.corp ([130.197.160.41]) by
CCCMSCON01.energy.power.corp with Microsoft SMTPSVC(6.0.3790.4675); Thu, 30
Dec 2010 13:14:58 -0600
X-MimeOLE: Produced By Microsoft Exchange V6.5
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MIME-Version: 1.0
Subject: Docket ID NRC-2010-0304
Date: Thu, 30 Dec 2010 13:14:57 -0600
Message-ID:
<27953B69198BAC4BBC14124414787C1CC62C4E@cccmsxch13.energy.power.corp>
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X-MS-TNEF-Correlator:
Thread-Topic: Docket ID NRC-2010-0304
thread-index: AcuoVdjl1n7eRORRQK0eMBdqJMLGQ==
From: <samuel.cato@exeloncorp.com>
To: <Rulemaking.Comments@nrc.gov>
Return-Path: samuel.cato@exeloncorp.com
X-OriginalArrivalTime: 30 Dec 2010 19:14:58.0055 (UTC) FILETIME=[D93D4970:01CBA855]
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boundary="-----_=_NextPart_001_01CBA855.D91C30B0"