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# PUBLIC SUBMISSION

**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-0013  
Comment on FR Doc # 2010-26715

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## Submitter Information

**Name:** Mike Mulka

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## General Comment

I am a Nuclear Station Operator at LaSalle Nuclear Station, Exelon Nuclear. I have read the NEI's petition 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 version 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.

Thanks

Template = SECY-067

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## 9 Rulemaking Comments

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**From:** Gallagher, Carol  
**Sent:** Tuesday, January 04, 2011 9:04 AM  
**To:** Rulemaking Comments  
**Subject:** Comment on PRM-26-5  
**Attachments:** NRC-2010-0304-DRAFT-0013.pdf

Van,

Attached for docketing is a comment from Mike Mulka on PRM-26-5 that I received via the regulations.gov website on 12/29/10.

Thanks,  
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by OWMS01.nrc.gov  
([148.184.100.43]) with mapi; Tue, 4 Jan 2011 09:03:46 -0500  
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To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>  
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