

PRM-26-5
(75FR65249)

DOCKETED
USNRC

January 4, 2011 (11:00am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

26

PUBLIC SUBMISSION

| |
|---------------------------------------|
| As of: January 04, 2011 |
| Received: December 30, 2010 |
| Status: Pending_Post |
| Tracking No. 80bc2020 |
| 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-0016

Comment on FR Doc # 2010-26715

Submitter Information

Name: Hobart Simons

Address: Florida

General Comment

I am a licensed Reactor Operator, license OP-21179, at a commercial nuclear generating facility in the Southeast. I am submitting these comments as an individual and not on behalf of the utility that I work for, or any other organization.

I am generally opposed to NEI's proposal to relax the Part 26 fatigue rules.

My experience is that the MDO rule works as it is intended and achieves the desired results.

The "unintended" consequences that NEI describes should be weighed carefully.

The additional duties that NEI describes in the supporting document are still items that are performed as work that require focus and mental sharpness to accomplish. These tasks, while not directly safety related work, still exact a component of fatigue on the worker that accumulates over time.

Having time off is very important in this industry because of the rigor and detail that it demands. Time off is required to unwind from the constant vigilance to safety that nuclear power requires.

Changing the rule to be less prescriptive than the current MDO requirements would be a step backwards such that it allows the industry to again encroach on the employee's free time, time that is necessary to relieve the accumulated stress and fatigue of work in the industry.

Template = SECY-067

DS 10

Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, January 04, 2011 9:34 AM
To: Rulemaking Comments
Subject: Comment on PRM-26-5
Attachments: NRC-2010-0304-DRAFT-0016.pdf

Van,

Attached for docketing is a comment from Hobart Simons on PRM-26-5 that I received via the regulations.gov website on 12/30/10.

Thanks,
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by TWMS01.nrc.gov
([148.184.200.145]) with mapi; Tue, 4 Jan 2011 09:34:04 -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: Tue, 4 Jan 2011 09:33:45 -0500
Subject: Comment on PRM-26-5
Thread-Topic: Comment on PRM-26-5
Thread-Index: AcusHGQ8N3UdCUanSrWIYBibJKmOig==
Message-ID:
<6F9E3C9DCAB9E448AAA49B8772A448C55EE2C8D41D@HQCLSTR01.nrc.gov>
Accept-Language: en-US
Content-Language: en-US
X-MS-Has-Attach: yes
X-MS-Exchange-Organization-SCL: -1
X-MS-TNEF-Correlator:
<6F9E3C9DCAB9E448AAA49B8772A448C55EE2C8D41D@HQCLSTR01.nrc.gov>
MIME-Version: 1.0