

PRM-26-5
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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-0020
Comment on FR Doc # 2010-26715

Submitter Information

Name: Peter Kuhlman

General Comment

I am a licensed Reactor Operator, at a commercial nuclear generating facility. I have over twenty years in the industry. I am submitting these comments as a personal shift working stakeholder, not on behalf of any utility, or any other organization.

I am opposed to NEI's proposal to relax the 10 CFR Part 26 fatigue rules. My experience is that the MDO rule works as it is intended and achieves the desired results. The rule is a vital tool in improving Human Performance by providing a good balance of time off necessary to get the proper restorative rest.

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. While there may be unintended consequences, the fact is that the rule applies to the Main Control Board Operator, which has to maintain the highest of standards and vigilance for 12 hours a day, six days a week under the worst conditions.

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. Averaging the hours over a shift cycle helps to normalize work schedule routines and reduces weeks with excessive back to back hours being scheduled. Changing the rule to be less prescriptive than the current MDO requirements would be a step backwards and dilute the effectiveness such that it would allow the industry to minimize the employee's free time, time that is necessary to relieve the accumulated stress and fatigue of work in the industry.

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4 Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, January 04, 2011 9:57 AM
To: Rulemaking Comments
Subject: Comment on PRM-26-5
Attachments: NRC-2010-0304-DRAFT-0020.pdf

Van,

Attached for docketing is a comment from Peter Kuhlman on PRM-26-5 that I received via the regulations.gov website on 1/1/11.

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 09:58:04 -0500
Content-Type: application/ms-tnef; name="winmail.dat"
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From: "Gallagher, Carol" <Carol.Gallagher@nrc.gov>
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>
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