

PRM-26-5
(75FR65249)

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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-0022
Comment on FR Doc # 2010-26715

Submitter Information

Address: United States,
Government Agency Type: Federal
Government Agency: NRC

General Comment

As a reactor operator for many years, I have observed understaffing by the utility company which has resulted in fatigue among my colleagues. Such a condition can be caused by a temporary demand for additional workers, such as a scheduled or forced outage, or by failure to adequately anticipate attrition in the workforce. Some causes are predictable while others are not. The resulting fatigue is the risk that the commission has tried to address. GL82-12 was a first step to address this problem. It helped. 10CFR26 changes, although difficult to implement, has helped some too. The petitioner cites undue complexity and inflexibility in the rule in managing worker fatigue. Complexity and inflexibility of the rule has been made necessary by utility companies' stubborn refusal to expand the workforce and take other measures to combat worker fatigue. While it is true that there are many complaints about earnings being limited, sleep cycles of night shift workers being disrupted and an increased number of contractual disputes arising from implementation of the rule, the petitioner suggests changes which would relax the rule in ways that would allow companies to work their existing workers more, doing nothing to alleviate fatigue, but increasing the probability of its occurrence. Fatigued workers do not need further compilation of work hour statistics or changes in definitions of shift cycles; fatigued workers need rest. While the rule cannot assure time away from work is used for restorative sleep, time at work is certainly not. This is true for work in any area of nuclear plants with operating licenses, not just the narrowly defined "covered work". I recommend expansion of the scope of "covered work". In its current form, 10CFR26 does not diminish safety, it enhances it. The petitioners request should be denied.

Templat = SECY-067

DS 10

Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, January 04, 2011 10:02 AM
To: Rulemaking Comments
Subject: Comment on PRM-26-5
Attachments: NRC-2010-0304-DRAFT-0022.pdf

Van,

Attached for docketing is a comment from an anonymous person on PRM-26-5 that I received via the regulations.gov website on 1/3/11.

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 10:02:22 -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 10:02:02 -0500
Subject: Comment on PRM-26-5
Thread-Topic: Comment on PRM-26-5
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