

PRM-26-5
(75FR65249)

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34

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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-0023
Comment on FR Doc # 2010-26715

Submitter Information

Name: Robin Ritzman
Address:
 76 South Main Street
 Akron, OH, 44308
Organization: FirstEnergy Nuclear Operating Company

General Comment

FirstEnergy Nuclear Operating Company (FENOC) supports the Petition to Amend 10 CFR Part 26, "Fitness-for-Duty Programs" submitted by the Nuclear Energy Institute (NEI) on September 3, 2010. FENOC also supports the Request for Enforcement Discretion regarding Minimum Days Off Provisions of 10 CFR Part 26, "Fitness-for-Duty Programs" submitted by NEI on September 23, 2010.

FENOC is concerned that the Nuclear Regulatory Commission (NRC) white paper "Work Hour Controls for Cumulative Fatigue Management" (ML 103640241) introduces additional complexities. These complexities may result in more unintended consequences than would be resolved by the elimination of Minimum Days Off. As a result, FENOC believes that the requirements proposed by the NRC to be implemented in lieu of the existing requirements of 10 CFR 26.205(d)(3) would exacerbate the issues that have been identified while implementing the fatigue rule and urges the staff to consider alternate solutions.

FENOC will be represented at the public meeting on January 6, 2011 to further discuss the NEI and NRC proposals.

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Rulemaking Comments

From: Gallagher, Carol
Sent: Wednesday, January 05, 2011 8:16 AM
To: Rulemaking Comments
Subject: Comment on PRM-26-5
Attachments: NRC-2010-0304-DRAFT-0023.pdf

Van,

Attached for docketing is a comment from Robin Ritzman on PRM-26-5 that I received via the regulations.gov website on 1/4/11.

Thanks,
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by OWMS01.nrc.gov
([148.184.100.43]) with mapi; Wed, 5 Jan 2011 08:17:05 -0500
Content-Type: application/ms-tnef; name="winmail.dat"
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To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>
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