

Rulemaking Comments

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**From:** robb.caputo@exeloncorp.com  
**Sent:** Thursday, January 06, 2011 1:27 AM  
**To:** Rulemaking Comments  
**Cc:** sabah.shams@exeloncorp.com  
**Subject:** NRC-2010-0304

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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

To Whom It May Concern,

In response to the new work hour rules for nuclear power plant personnel, I feel that the intentions were good but, unfortunately, the results proved more negative in a few ways. The rules have made the work hours more unsafe, have caused much confusion and frustration where the need is to lessen these things in nuclear plant operations and have resulted in the personnel with the most responsibility becoming the least compensated group.

In regards to becoming more unsafe, in the almost twenty years of operations I have, never have I felt more unsafe and fatigued as when I had to come to work at 3 AM. There have been countless shifts created which end and start at 3 AM as a result of the 10 hours off between shifts. It is very difficult to sleep worrying if you will hear the alarm clock and wake up or not in time to get to work at that hour. I personally could not get any sleep with one eye on the alarm clock and knowing my family will be disturbed in the wee hours as well.

The frustration caused by having to do a last minute call out during the shift, especially on backshifts, is a great cause of unnecessary burden on the on shift personnel to not call in someone and violate work hour rules. It is also very time consuming to say the least.

The last, and most important, reason for changing the work hour rules is the limitations placed on certain work groups has caused a major decrease in compensation. Primarily on work groups which have the most responsibility to operate the plants and keep the public safe. Surely, this is a great source of decrease in the morale of the personnel. I believe these people should be more highly compensated merely by their commitment and responsibility especially considering they are the ones who are here 24 hours a day, 7 days a week, 365 days a year.

I believe going back to the previous set of regulations is in the best interest of all parties.

Thank you for your time,  
Sabah Shams  
Exelon Corporation  
Lasalle Station Operations

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