

Rulemaking Comments

From: Todd Newkirk [newkyqt@gmail.com]
Sent: Friday, January 21, 2011 1:49 PM
To: Rulemaking Comments
Subject: Anonymous Comment to NRC-2010-0304, PRM-26-5

DOCKETED
USNRC

January 21, 2011 (3:11 pm)

Anonymous Submission

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary,

NRC-2010-0304, PRM-26-5, 10CFR26 - Subpart I, Fatigue Management

PRM-26-5 should be allowed to enter the rulemaking process. During the process it is hoped a meaningful, simplified, and well-rounded rule is found that becomes part of a revised regulation. In reviewing previous rulemaking efforts on this issue many concerns were placed to the NRC such as; various unintended consequence scenarios, rule complexity, and the scope of covered workers for fatigue management. The NRC commissioners themselves held these concerns readily apparent in the June 2005 NRC Commissioner Voting Record comments. A well rounded rule would contain the following rulemaking discussion; MDO's (Minimum Days Off) if regulatory required SHOULD ONLY APPLY to shift workers performing security and operations department functions as covered MDO work, eliminate or simplify covered and non-covered work definitions, return work day and work week ceilings to any person with unescorted access as Generic Letter 82-12 was practiced previously at the majority of licensee's. The 10-hour and 34-hour break provisions should be kept and applied to all workers operating or performing work on risk significant SSC's (Structures, Systems and Components). If over the road truck drivers can erase cumulative fatigue in a 10 hour break by DOT law, where is the science that makes people working in a power plant held to a higher standard that the NRC has designed? The nuclear worker is already riddled with additional un-necessary burden placed by the regulators in 10CFR26 and 73. When is it ever going to stop and achieve stability for the workforce? The current rule will never force a utility to hire more people. The definition of an outage period needs re-examined other than the current definition as when the unit is on-line or off-line as PR-26-3 has sought to accomplish. Thank-you.

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13:49:06 -0500

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