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Docket: NRC-2011-0058
Alternative Controls Governing Minimum Time Off

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USNRC

Comment On: NRC-2011-0058-0001
Alternative to Minimum Days Off Requirements

May 23, 2011 (4:02 pm)

Document: NRC-2011-0058-DRAFT-0003
Comment on FR Doc # 2011-09925

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Submitter Information

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General Comment

It is my opinion that the application of the rule still does not guarantee that an individual will provide a diligent work station.

Constant surveillance is a requirement for work stations under the rule while others may only require focus during the execution of their assigned duty. For example; Control Room duties versus execution of Health Physics access control during an emergency. I also believe that the proposed administrative burden will not be any better than the current burden. It is my opinion that it is more important to be able to demonstrate compliance with qualified individuals than spending the time to confirm that the individual meets the fatigue rule. I am disappointed in the complexity of the rule and how the issue was missed and it appears that the rulemakers are not willing to reevaluate the still impacting rule. Outage versus non-outage rules. Actual emergency versus drills, force on force drills. All these exemptions are very confusing. How about starting over and doing a better review of what the issue really is.

Template = SECY-067

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Rulemaking Comments

From: Gallagher, Carol
Sent: Monday, May 23, 2011 3:04 PM
To: Rulemaking Comments
Subject: Comment on Alternative to Minimum Days Office Requirements
Attachments: NRC-2011-0058-DRAFT-0003.pdf

Van,

Attached for docketing is a comment from Harry Sloan on the above noted proposed rule (76 FR 23208; 3150-A194) that I received via the regulations.gov website on 5/22/11.

Thanks,
Carol