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(76FR23208)

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PUBLIC SUBMISSION

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

DOCKETED
 USNRC

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

May 26, 2011 (9:07am)

Document: NRC-2011-0058-DRAFT-0004
 Comment on FR Doc # 2011-09925

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

Submitter Information

Name: Mark Callahan

Address:

2065 N. 2653 Road
 Marseilles, IL, 61341

Submitter's Representative: Local 15 IBEW

Organization: Exelon Nuclear

Government Agency Type: Federal

Government Agency: NRC

General Comment

The current work hour rule is intended to reduce worker fatigue, but my experience is that it has the OPPOSITE effect.

If working a Dayshift schedule having to take a day off is not disruptive to one's sleep pattern. HOWEVER, when working BACKSHIFT schedule taking a one day break disrupts this sleep pattern. This disruption takes SEVERAL DAYS to recover from, thus INDUCING FATIGUE. My personal experience supports the idea that once adjusted to an unnatural sleep pattern (nightshift), it is far better to continue that pattern for the duration of an outage. My past experience shows that even working 14 to 21 nights in a row is LESS FATIGUEING than breaking that sleep cycle for one day.

Perhaps the OPTION of working one 8 hour shift every week could limit hours worked during outages without disrupting the established sleep pattern an individual has been acclimated to.

Beside the fact of not reducing worker fatigue, the current work hour rule has negatively impacted my earning ability by \$12,000 or more per year.

Thank you for taking my
 comments into consideration,

Respectfully,

Mark Callahan

Mech. Maintenance Tech.

LaSalle County Station

Exelon Nuclear

Template = SECY-067

DS 10

Rulemaking Comments

From: Gallagher, Carol
Sent: Thursday, May 26, 2011 7:52 AM
To: Rulemaking Comments
Subject: Comment on Alternative to Minimum Days Off Requirements
Attachments: NRC-2011-0058-DRAFT-0004.pdf

Van,

Attached for docketing is a comment from Mark Callahan on the above noted proposed rule (76 FR 23208; 3150-AI94) that I received via the regulations.gov website on 5/25/11.

Thanks,
Carol