

Rulemaking Comments

From: larry.lawson@exeloncorp.com
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To: Rulemaking Comments
Subject: Rulemaking

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

To whom it may concern,

I am a reactor operator at the Byron Nuclear station and have been licensed for 22 years. I believe this is day 30 of your 30 day time limit for submitting comments. My opinion is that there should be no changes allowed to the MDO requirement. The NRC implemented the new work hour rules because the nuclear industry blatantly disregarded the limits of the old 82-12 guidelines. I believe the NRC implemented the new work hour rules in an effort to encourage the industry to adequately staff it's nuclear plants and thereby reduce the effects of cumulative fatigue on plant operations. The nuclear industry has done no such thing and has instead sought relief from the rules with this new rulemaking. The NRC seems to be willing to give the industry whatever it wants in lieu of hiring more people. The fact that you have shortened the public comment period from the usual 75 days to only 30 days at NEI's request speaks volumes for the amount of influence NEI has had. Your new rule would allow us to have only 1 day off in 17, which by your own admission could lead to fatigue, yet you are willing to implement this change. Even a violation of the 54 hour average would result in either a "minor or non-cited violation" which hardly seems a deterrent to the type of abuse we had during the 82-12 years. The only way the industry is going to hire more people is when it becomes too painful for them not to. By implementing this new rule, you have taken away what little incentive they had to increase staffing. Whatever claims NEI makes about administrative burden or less flexibility is just double-talk for saving money by keeping staffing levels low.

When a fatigued operator makes a consequential error on his 16th straight day of work, you will bear some of the responsibility. I hope that I am not that operator.

Respectfully,
Larry Lawson

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