

## RulemakingComments Resource

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**From:** Defore, Jason E [jedefore@tva.gov]  
**Sent:** Friday, May 31, 2013 11:59 AM  
**To:** RulemakingComments Resource  
**Subject:** 10 CFR 73, Docket PRM 73-16/NRC-2013-24

This comment pertains to the petition for a revision to Personnel Access Authorization Requirements for Nuclear Power Plants.

I was just made aware of the request to remove a 3<sup>rd</sup> party review from access revocation. The only information that I see is the docket listed in the subject line. As a nuclear operator (non-licensed), I can't comprehend that this would even be entertained by the NRC. From a regulatory perspective, it would seem to me that the NRC would encourage a 'No Fear' mentality with an open door policy. If the 3<sup>rd</sup> party review were removed, the revocation of an employee's plant access would be limited to the Utility. If, at some point, an employee were singled out for any action (even if the action was in the interest of nuclear safety), could be removed from the site and employment terminated. Even if, an arbitrator allowed the employee to regain their position, the access would still be removed or unattainable. Having now had 16 years of nuclear experience, and 8 years of commercial experience, I have witnessed first-hand operators that were singled out due to raising concerns (mostly in the commercial world).

From an operator perspective, this makes me think that some may be a little more leery of raising issues and concerns, for fear of being removed by a poor management regime. Now, this would probably be a very, very rare case. However, if one event were to occur due to a concern not being raised, this would seem to negate the entire effort and mission of the NRC. In my opinion as a VERY conservative operator, this is would be a poor, short-sighted decision made in the interests of saving utilities' some quick cash. Even as the petition is written, 'expedited review' as to affect current arbitration cases, seems very suspect of a utility that is losing or spending money on a current arbitration or hearing(s). The processes are common in the United States and are what make us a very unique and fair nation.

Thank you for taking time to read this and hopefully using it in your consideration for this petition. Very respectfully,  
Jason E. DeFore.