

RulemakingComments Resource

From: IBEW1483 <IBEW1483@yahoo.com>
Sent: Friday, May 31, 2013 3:37 PM
To: RulemakingComments Resource
Subject: FW:
Attachments: NRC letter.docx

Dear Ms. Vietti-Cook:

Please find the attached document concerning the right to arbitrate disputes over access authorization.

Thank-you for your consideration.

Mark Salerno

President/Business Manager

IBEW LU 1483

Annette L. Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Docket ID NRC-2013-0024.

Dear Ms. Vietti-Cook:

I am the current Business Manager of IBEW Local Union 1483 located in Omaha, Nebraska. Included in our jurisdiction are many employees who work at the Fort Calhoun Station (FCS). I have reviewed the NEI petition and believe that passing this proposal is both unfair and inadvisable.

Our local union as well as many others have fought and bargaining for the opportunity to use binding arbitration as the method to settle disagreements in the workplace. Utilizing an impartial third party to settle disputes is clearly a fair and rational method to encourage cooperation and positive relations between labor and management. Any restrictions of rights of labor will be interpreted as one-sided attempt to upset the balance of power between labor and management.

I believe that this proposal will have a deleterious effect on the important relationships that are conducive to collaboration and trust in the workplace. Employees will rightfully conclude that the process is intentionally flawed in order to advantage the employer by not allowing a third party to decide the disagreement.

If this rule is adopted it is very likely that employees will generalize their resentment to the NRC as well as their employer. It would seem that the NRC would do well to refrain from weighing on labor relations issues that do not concern public safety.

The process of collective bargaining has proven to be the best method of establishing fairness and equality in the workplace. The term and conditions of employment should be decided at the bargaining table where both management and the union can make arguments and share each other's point of view. Regulations issued by the NRC at the industry's request is clearly outside of the process and is an unnecessary infringement on a respected process that has served the industry as well both management and labor in the past.

IBEW 1483 is committed to protecting security at FCS as well as the public safety in general. Any genuine threat will not be tolerated by this union. It is the case however; that minor infractions that have nothing to do with public safety are arbitrated. Without the guarantee of unrestricted arbitration employers will have the power to discharge employees for any reason since the employees will be denied their collective bargained for right of allowing an impartial third party to decide their fate.

I urge you to not support any proposal that upsets the balance of power between labor and management. I believe this proposal will have a negative effect on the relationship that exists between management and labor and is not worthy of support.

Mark Salerno
President/Business Manager
IBEW LU 1483