RulemakingComments Resource

| From: Sent: | Sam L. Keith <sam.keith@ibew50.org> Tuesday, June 04, 2013 9:01 AM</sam.keith@ibew50.org> |
|----------------|---|
| To: | RulemakingComments Resource |
| Cc: | Mullen, David; B C Stevens |
| Subject: | Docket ID NRC 2013 0024 comments from IBEW Local 50 |
| Attachments: | lu50 comments to nrc.pdf |

Please find attached comments from IBEW Local Union 50.

A hard copy will also be mailed.

Sincerely

Sam L. Keith Senior Business Representative

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Local Union 50

International

Electrical



AFL-CIO

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Brad Stevens

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Recording Secretary: Mike Barclay

Treasurer: John Albert

June 4, 2013

Annette L. Vietti-Cook

Secretary of the Commission

U.S. Nuclear Regulatory Commission

Washington D.C. 20555-0001

Re: Docket ID NRC-2013-0024

Dear Ms. Vietti-Cook:

My name is Brad Stevens. I am the President/Business Manager of Local Union 50 of the International Brotherhood of Electrical Workers. Our office is in Highland Springs Virginia. We have a Collective Bargaining agreement with Dominion and represent the hourly workers that operate and maintain the units at North Anna Nuclear Power Station and Surry Nuclear Power Station. Both of those stations are in Virginia.

I have reviewed the NEI petition and believe adoption of the NEI proposal would be unwise and unfair to the workers that our Local Union represents.

Arbitration provides an opportunity for an employee to defend him or herself and is the only forum in which the employer's determination must be explained and can be challenged. Placing restrictions on arbitration will be a distraction which could undermine human performance of the workforce in the plant and create potential safety issues.

Senior Business Representatives: Sam Keith Gene Poats Roger Sulenski

> Business Representatives: John Albert

Mike Barclay Glenn Dawson John King Van Thrash Doug Williams Ms. Annette L. Vietti-Cook

June 4, 2013

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Our Grievance and Arbitration procedures came about through collective bargaining. Those terms should not be changed by regulations issued by the NRC at the industry's request. We have arbitrated cases dealing with discipline and discharge under our Collective Bargaining Agreement and there has been no adverse effect on safety or adverse consequences.

I.B.E.W. Local Union 50 and the workers that we represent are committed to security and public safety. The changes proposed by NEI will only take away rights of the workers that we represent without improving either of those important items.

Sincerely,

evens xxx

Brad Stevens President/Business Manager

BCS: slk

Cc: IBEW Utility Department