

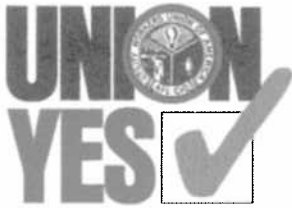
## RulemakingComments Resource

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**From:** Jamie Paulos <jamie@uwua246.com>  
**Sent:** Thursday, June 06, 2013 4:13 PM  
**To:** RulemakingComments Resource  
**Cc:** uwuasharon@yahoo.com  
**Subject:** Docket IN NRC-2013-0024  
**Attachments:** Anstaett Comments NRC 6.6.13.PDF

Please see attached letter.

Thank you,  
Jamie Paulos  
Office Manager  
UWUA, Local 246  
562.594.8881  
562.735.5117 - Fax



# UTILITY WORKERS UNION OF AMERICA

LOCAL NO. 246 AFL-CIO

10355 LOS ALAMITOS BOULEVARD • LOS ALAMITOS, CALIFORNIA 90720-2190  
(562) 594-8881 • 1-800-228-2998 • FAX (562) 594-0829



June 6, 2013

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

Subject: Docket ID NRC-2013-0024

Dear Ms. Vietti-Cook :

I am submitting comments on behalf the of Utility Workers Union of America, Local 246, AFL-CIO regarding the Nuclear Energy Institutes (NEI) petition to amend the NRC regulations to limit the scope of third –party review of Licensee decisions denying or revoking an employee’s unescorted access at their facility. I have been employed by Southern California Edison for seventeen years (17) and work as a Material Handler at the San Onofre Nuclear Generating Station. In addition to working for Southern California Edison, I am the President for the Utility Workers Union Of America, Local 246, AFL-CIO. Local 246 represents the operations, maintenance, technical, clerical, warehouse, nurses, fire fighters and engineering employees at the San Onofre Nuclear Generating Station (SONGS) in southern California.

During my seventeen (17) years working in nuclear power, I have been involved in access disputes through the grievance process that resulted in arbitration decisions to restore an employee’s unescorted access to the nuclear facility. Some of the denials of access for certain individuals have been done in a retaliatory way by either their immediate supervisor or manager. Once an employee’s unescorted access is denied they no longer meet the regulatory requirements and these individuals are given ninety (90) days to find another job. If they are unable to find another job within the ninety (90) days their employment is terminated. In my seventeen (17) years as an SCE employee and union officer these arbitration decisions to restore unescorted access have never resulted in any security or safety issues. In fact the arbitration process provides employee’s that have been denied unescorted access an opportunity to dispute the employer’s decision. Arbitration allows both the union and the employer to present evidence and provide sworn testimony and the ability to cross examine witnesses. Before an arbitration starts both parties (union and employer) will have chosen and mutually agreed to the arbitrator whose decision they have both agreed to be legally bound by.

To my knowledge NEI has not provided any specific examples or evidence that would support their concerns. In addition after reviewing NEI’s information I could not find any references or examples where an arbitrator’s decision reinstating an employee’s unescorted access resulted in any security issues safety issues.

All employee’s working in a nuclear environment have the right to a working environment free of retaliation, discrimination including harassment.

If the NEI is allowed to amend the NRC regulations to limit the scope of third party review of Licensee decisions denying or revoking and employee's unescorted access to a nuclear facility would cause the entire nuclear community to take a step backwards.

Lastly, the Utility Workers Union of America, Local 246 respectfully requests the Commission deny the NEI's petition for rulemaking. Please don't hesitate to contact me if you have any questions or if you wish clarification on our concerns.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Anstaett".

Sharon Anstaett  
President  
UWUA, Local 246

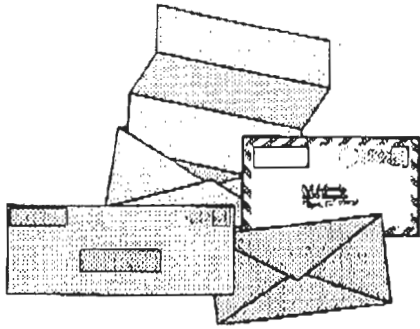
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# FAX

Date: 6/6/13

Number of pages including cover sheet: 3



To:	From:
<u>Annette L. Vietti-Cook</u>	<u>Sharon Anstaett</u>
<u>Secretary of the Commission</u>	
<u>US Nuclear Regulatory Commission</u>	
<u>Docket ID NRC-2013-0024</u>	
Phone _____	Phone: (562) 594-8881 (800) 228-2998
CC: _____	Fax phone: (562) 594-0829

REMARKS:  Urgent  For your review  Reply ASAP  Please comment