

# United States Senate

WASHINGTON, D.C. 20510

February 29, 1980

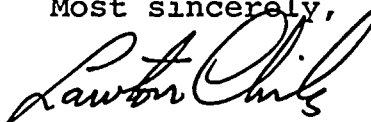
Mr. Carlton Kammerer  
Nuclear Regulatory Commission  
Office of Congressional Affairs  
1712 H Street, N. W.  
Washington, D. C. 20555

Dear Mr. Kammerer:

I have recently received the enclosed correspondence regarding a matter involving your agency, and because of my desire to be responsive to all inquiries, I would appreciate having your comments and views.

Your early consideration of this matter will be appreciated and, if convenient, I would like to have your reply in duplicate directed to my State Office, Federal Building, Lakeland, Florida 33801. In your communication, please return the enclosure and make reference to this letter as indicated below.

Most sincerely,

  
LAWTON CHILES

LC/rob  
Enclosure

RE: In reply, please refer to: John D. Coulliette



100-100000-100000

100-100000-100000

February 19, 1980

Dear Senator Chiles:

In June of last year some fellow workers and I sent you a copy of a letter addressed to the Nuclear Regulatory Commission concerning the safety aspect of working extended hours at our nuclear power plant. We thought you might be interested in a recent I&E Circular addressing the subject. While our methodology was somewhat unconventional, our concern was genuine, and we are pleased that the NRC has formally recognized the problem. We would like to take this opportunity to thank you for your interest and support in this matter.

Hopefully someday, those of use who live with nuclear power on a daily basis will be afforded the opportunity to have a direct and formal input into matters of nuclear concern. Ideally, we would like to establish a professional association to serve as a collective voice from the people who live in the "real world" of nuclear power operations. Any guidance you could offer us on achieving this goal would be greatly appreciated.

For your edification, I have enclosed a copy of a letter addressing another area of concern in which we have not been able to get any results. Please let me offer a little background on this issue. Regular long time plant employees are frisked and their handbaggage searched prior to entering the plant. We have accepted this as being necessary. However, to put things in perspective, a security guard who has been hired off the street by Wackenhut Corporation only a few weeks prior can enter the control room alone, with a loaded weapon, at any time. We hope that this letter is received in the same sincere spirit in which it is being offered. We are merely asking that weapons be banned, period.

Again, thank you for your support. We will be in contact with you in the future.

Sincerely,

A handwritten signature in cursive script, reading "John D. Coullieth". The signature is written in dark ink and is positioned below the typed name "Sincerely,".

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SSINS No.: 6830  
Accession No.:  
7912190657

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT  
WASHINGTON, D.C. 20555

February 1, 1980

IE Circular No. 80-02

NUCLEAR POWER PLANT STAFF WORK HOURS

Description of Circumstances:

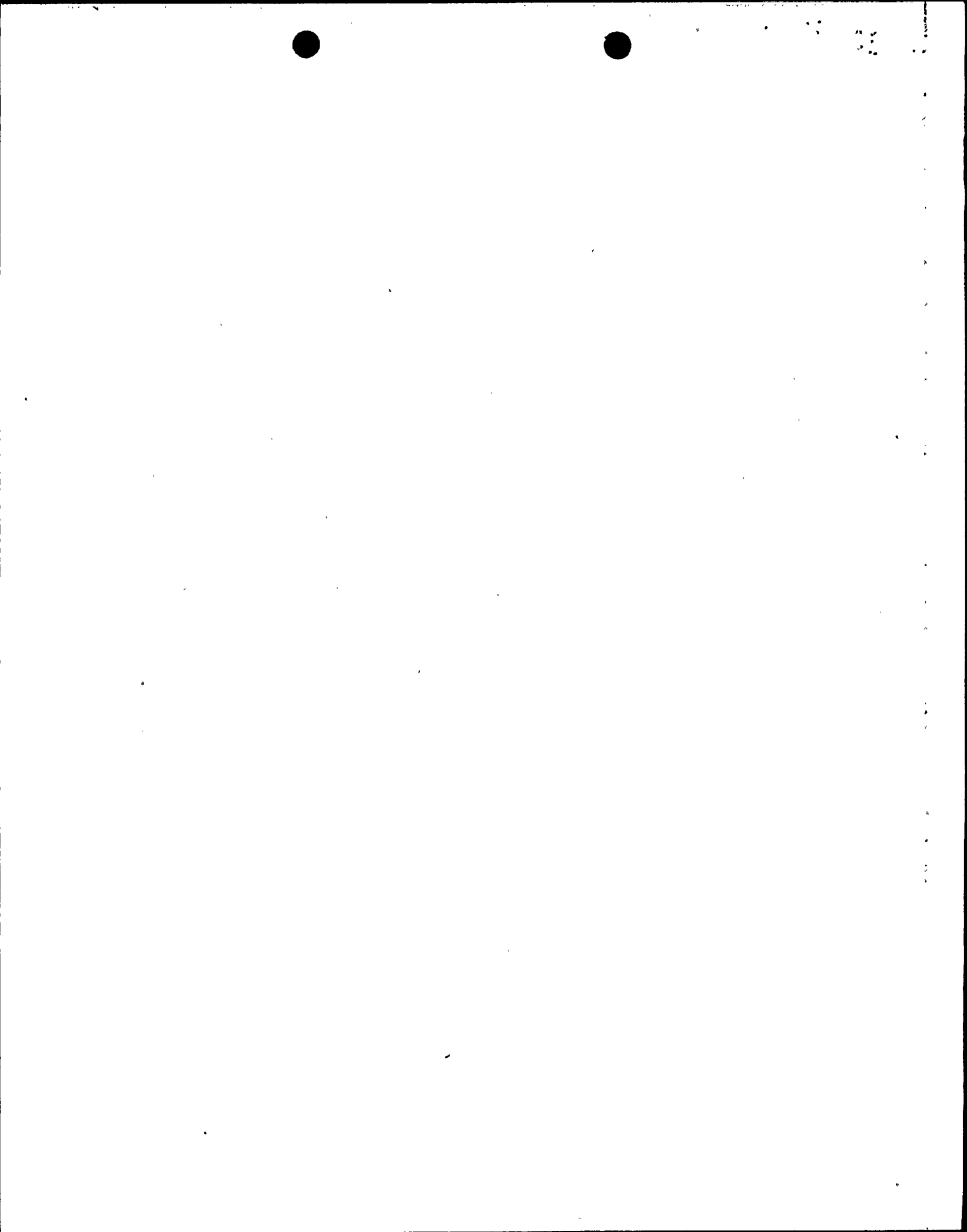
Studies indicate that with fatigue, especially because of loss of sleep, an individual's detection of visual signals deteriorates markedly, the time it takes for a person to make a decision increases and more errors are made, and reading rates decrease. Other studies show that fatigue results in personnel ignoring some signals because they develop their own subjective standards as to what is important, and as they become more fatigued they ignore more signals.

Inspections of personnel performance and training since the accident at Three Mile Island, ~~have shown that in certain situations facility personnel are~~ either required or allowed to remain on duty for extended periods of time. Also, complaints have been received from some licensed nuclear power plant operators concerning the number of continuous hours they have been on duty.

Licensee management is responsible for providing a sufficient number of trained personnel who are in the proper physical condition to operate and maintain the plant. Licensee management should review their administrative procedures covering the working hours of nuclear power plant staff. These procedures should establish a sound policy covering working hours for plant staff who perform safety related functions (e.g., senior reactor operators, reactor operators, health physicists, auxiliary operators, I&C technicians, key maintenance personnel, etc.).

Subcommittee ANS-3 is currently developing criteria to address the subject of operator work hours. These guidelines will become a part of ANSI N18.7. The NRC is also considering issuing requirements for administrative procedures that would control staff overtime. Until either the ANSI Standard is issued and endorsed by NRC (via a Regulatory Guide) or separate requirements are issued by NRC, it is recommended that the following guidance be used. The guidance should be applied to all personnel performing a safety related function:

1. Scheduled work should be limited to the following maximum work hours:
  - a. An individual should not be permitted to work more than 12 hours straight.



- b. There should be at least a 12-hour break between all work periods.
  - c. An individual should not work more than 72-hours in any 7-day period.
  - d. An individual should not work more than 14 consecutive days without having 2 consecutive days off.
2. In the event that special circumstances arise that require deviation from the above, such deviations should be authorized by the Station Manager with appropriate documentation of the cause. Plants should be staffed and schedules developed to operate such that exceptions are not required.
  3. If an operator is required to work in excess of 12 continuous hours, his duties should be carefully selected. It is preferable that he not be assigned any task that affects core reactivity or could possibly endanger ~~the safe operation of the plant.~~

No written response to this Circular is required. If you desire additional information regarding this matter, contact the Director of the appropriate NRC Regional Office.

We the undersigned licensed operators at St. Lucie Nuclear Power Plant in the spirit of promoting safe conditions for both employees and the general public hereby enter in good faith the following statement of employee sentiment and request for corrective action.

Weapons are being routinely introduced into the control room by members of the security force. We contend that this practice is unnecessary, unsafe and defeats the intent of our in-plant security plan. We therefore respectfully request that this practice be terminated immediately and weapons be banned from the control room hereafter.

John D. Cullitt     Sgt. Turock  
K. J. W.     M. West  
L. H.     ~~W. B. ...~~  
L. H.     D. W. Kuntz  
David M.     F. M. Papp  
J. H.     R. E.     5  
Charles D. Maple     7 Kilmer  
J. W.     ...  
J. W.     ...  
L. O.     ...  
K. S.     ...  
C. L.     ...  
A. W.     ...  
M. J.     ...  
Joseph Villa Jr.  
L. W.     ...

- cc: Nuclear Regulatory Commission  
LAWTON CHILES  
Richard (Dick) Stone  
M. McDonald  
J. J. Hudiburg  
E. A. Adomat  
A. D. Schmidt  
R. L. Dees  
C. O. Woody  
K. N. Harris  
C. M. Wethy  
J. H. Barrow  
C. A. Wells  
J. Niles  
R. Nadwodny



