

SEP 11 1989

September 5, 1989

H.L. Nickerson
Box 554
Seneca, IL 61360

United States Nuclear Regulatory Comm.
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

ATTN: Charles H. Weil
Investigation & Compliance Specialist

SUBJECT

16 hour shifts and or excessive overtime at nuclear power generating plants.

Thank you for your letter of August 7th, 1989 and attached report of investigation which listed the number of 16 hour shifts worked during an eight week period at three nuclear plants.

In my opinion a check of overtime records during an eight week period out of 52 weeks for a year is a very small percentage. However, the 8 week period indicates that the number of 16 hour shifts is excessive.

My position on 16 hour shifts as stated in my letter dated August 8, 1988 has not changed. In my opinion, it is not a safe practice to schedule nuclear power plant personnel for 16 hour shifts. In some of our correspondence it has been indicated that a 16 hour shift is standard industrial practice. I question if it is good judgement to apply the same personnel policy's established for an industrial or utility steam plant fired by coal, oil or gas to a nuclear plant. An accident in a fossil fuel fired plant involves only that plant and the personnel in the immediate vicinity. An accident in a nuclear plant could involve millions of people.

The report of August 7, 1989 states that a person is not to be scheduled for more than 24 hours out of a 48 hour period. If a person is scheduled for a 16 hour shift, 8 hours not scheduled and returns for an 8 hour shift, there is an excellent possibility that

891130174

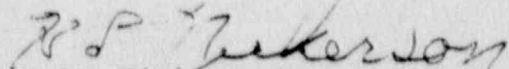
RAY

Page 2

this schedule could result in 32 hours without sleep. Out of the 8 hours not scheduled, family time, travel time, and other demands reduce the non-scheduled time considerably.

I realize that the concerns over 16 hour shifts, and if standard personnel policy for industrial plants is applicable for nuclear power plants, cannot be easily resolved. Therefore, I am forwarding your report of August 7, 1989 and my letter of August 8, 1988 to Congressman Dennis Hastert, Senator Paul Simon and Senator Allen Dixon for their consideration.

Yours truly,


H.L. Nickerson

HLN/jsh

Enclosures

Letter by H. Nickerson dated 8/8/88.

N.R.C. report of 8/4/89 No. 50-456/88024, No. 50-457/88024 et al.

Letter by Charles H. Weil dated August 7, 1989