

Date:

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Jan 3, 1991

Dear Gentlemen:

In the Matter of) TVA-SQN-TS-90-22
Tennessee Valley Authority) Docket Nos. 50-327
50-328

Reference: SEQUOYAH NUCLEAR PLANT (SQN) - TECHNICAL
SPECIFICATION (TS) 90-22

I am writing in protest to the addition of the requirements of Generic Letter (GL) 82-16 to section 6.0 FACILITY STAFF in Sequoyah Nuclear Plants (SQN) Technical Specifications (TS) on Units 1 and 2. The addition of this NRC guideline on overtime distribution would violate my current contractual rights. I presently have a jointly agreed overtime agreement that was agreed to by both US-TVA and the International Brotherhood of Electrical Workers in 1980.

This overtime agreement has worked for several years to insure that I received fair treatment in being offered overtime and that I also received fair treatment when it came time to force someone in my classification to work. It is set up to offer the low employee in classification that is off and has had eight hours rest and will not be required to work 16 hours continuously while also insuring that if no one wanted to work that was not at work that the company could force the employee who had the lowest overtime hours for the year over to the next shift. This agreement also insured that if I requested someone to come in to relieve me and let me go home, they could be called in early. However, this this did not give the company the right to force someone in against their will unless their was a bonafide emergency.

This 1980 Overtime Agreement insures that the company will have an employee, most of the time a volunteer, to work overtime; while allowing the employee the right to make plans during his off days and giving some regularity to the employees life.

Does it not make more sense to have an employee on duty that is volunteering vs an employee that is forced in on their off day and has not necessarily insured that he/she are fit for duty. I believe that if something is not done to stop this TS change and get both the IBEW and US-TVA together to resolve the issue in accordance with collective bargaining requirements there will be nothing except trouble and the NRC will be a major moving party to blame.

In closing, I am a bargaining unit member who is entitled to the rights of collective bargaining prior to any change to the General Agreement which I support and live under. The NRC and US-TVA appear to believe they are above the law, customs, and Constitution that this county was founded. This is a change in my conditions of employment and I demand to be treated with proper respect and not dictated to like a servant in a communistic country.

Very truly yours,

Ken Shaffner

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