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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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December 3, 1999

Dear Secretary:

I am writing out of concern for public safety from nuclear power plant mishaps. As a member of the Union of Concerned Scientists and a public health professional, I feel strongly about the lax efforts on the part of the NRC to guard against staff fatigue and protection for employee "whistleblowers". It is in the interest of nuclear power plant staff, the public, and the NRC to choose a risk averse strategy for nuclear safety. Faced with increased competition, nuclear power plant owners continue to stretch worker hours and reduce staff. Overworked employees are presently allowed to repair, inspect and test safety equipment when nuclear power plants are operating or shut down. Numerous studies have found that fatigue impairs human performance, and it is well known that human performance problems contributed to the nuclear accidents at Three Mile Island and Chernobyl. At present, the NRC has no regulations against excessive overtime and frequently looks the other way when plant owners abuse the agency's overtime guidelines.

In addition to establishing limits on employee working hours at nuclear power plants, the NRC should actively protect plant workers who conscientiously raise safety concerns. At present, the NRC appears more a handmaiden of nuclear industry than a protector of "whistleblowers" who risk their livelihood to suffer fear, harassment and intimidation. Nuclear plant owners should be required to train supervisors and managers on the employee protection regulations, and employers or employees should not be allowed to use "ignorance of the law" as a shield for illegal action. At present, the NRC has done little more than slap the hand of the nuclear power industry for serious violations of safety and employee protection. Individual power plant owners, supervisors and management should be consistently held personally accountable for violations, as occasional fines are little deterrent to industry abuses.

It is in the best interest of the NRC to strongly protect the public and the environment from a nuclear power plant accident. It is critically important to be vigilant against safety risks. The horror of an accident can be avoided by a stronger NRC working in the interests of the public rather than of industry.

Sincerely,

Paula K. Ivey
Paula K. Ivey, Ph.D.

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