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

DOCKET NUMBER
PETITION RULE PRM 30-62
(64FR57785)

To Whom It May Concern:

It is my understanding that we are currently in the public comment period for two proposed rules, which I urge you to support and enforce. While, in the past, the NRC has acted more as the Nuclear Industry Protection Commission, than fulfilling its mandate to regulate the industry and protect workers and consumers from the great dangers posed by nuclear plants that are operated without regard for anything but profit.

Such outrages include allowing owners to demand long overtime shifts of their operators, despite the fact 17 hours of wakefulness has the same effect on the body as a blood alcohol level of .05%. Your own regulations prohibit a blood alcohol level of .04%. It is as if you permit and encourage drunkenness on the job. (Perhaps this should not be surprising, since it is well known here — in Seabrook Station's backyard — that when that plant was being built, workers were returning from lunch drunk.) This allowance of excessive overtime must be stopped, for the safety of all. True, you have guidelines that limit workers to 16 hours per day and 72 hours per week. But these guidelines only specifically apply to control room operators and key maintenance personnel. Managers, safety inspectors, engineers, and other plant workers are not explicitly covered by these guidelines. Moreover, you seem to lack the ability to enforce these limits because they are "just guidelines;" and guidelines that apply only when the plant is running. Plant owners force workers to put in 12 to 16 hour days for weeks on end during refueling. ALL of the maintenance on jet airliners is performed when the planes are on the ground. But the FAA would not permit this maintenance to be performed by drunken maintenance crews. Federal law places working hour limits on safety related jobs, like truck driver and airline pilot to protect the public from fatigued workers. Employees at nuclear power plants should have the same enforceable limits, whether plants are running or not.

The second rule pertains to whistleblowers; who in the absence of effective oversight from your commission, and from owners whose incentives often run directly counter

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to safety concerns; are the best means of determining when a plant is operating outside the bounds of safety. For over twenty years and in many, many instances; these brave souls have alerted the public, and you, to grave danger. On the basis of their reports, actions have been taken which has included the closing of some plants. Yet, they are themselves in danger of retribution from the plant owners and operators who see their profits threatened. While regulations are in place, they are woefully inadequate. You will, perhaps, sanction the company in an amount equal to a third to a half a day's profit -- hardly an incentive at all. Yet those individuals who intimidate and worse are let off scot free. Even those limited sanctions I spoke of may not be imposed if the operator claims not to have known about it -- and just how easy is it to lie about such things? especially when there is money at stake? The new rule would remove this ignorance claim, and you should support and enforce it. After all, ignorance of the law is no excuse anywhere else in our system. Personal accountability will go a long way to clean up this mess!

Sincerely,

A handwritten signature in black ink, appearing to read "C. Alexander Cohen". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

C. Alexander Cohen