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December 3, 1999

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

Dear Sir or Madame:

On behalf of the over 300,00 members of the Citizens Action Coalition of Indiana, I am writing in support of the proposed rules to 1) establish limits on employee working hours at nuclear power plants even if the plant is shut down for maintenance or refueling; and 2) require training of management personnel regarding the rights of employees who point out safety violations and/or express concerns about safety.

In regard to the proposed rule limiting the amount of time worked in a single shift or week:

With the onset of electric utility restructuring, nuclear power plant owners face great pressure to slash operating costs, forcing plant owners to reduce staffing levels. As a result, remaining staff members must work longer and longer hours.

Numerous studies have concluded that fatigue impairs human performance. In fact, some studies have shown that being awake for 17 hours has the same adverse effect on human performance as having a blood alcohol level of 0.05%. Regulation implemented by the NRC in the 1980s ban workers with a blood alcohol level greater than 0.04% from nuclear power plants.

Allowing fatigued workers to work during outages because the plants are shut down at the time defies common sense. ALL of the

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maintenance on jet airliners is performed when the planes are on the ground, yet the FAA would never permit this maintenance to be performed by alcohol-impaired workers. The Federal government imposes working hour limits on truck drivers and airline pilots to protect the public from fatigued workers. The Citizens Action Coalition of Indiana believes it is time for the Federal government to impose working hour limits on employees at nuclear power plants that can be enforced whether plants are running or not.

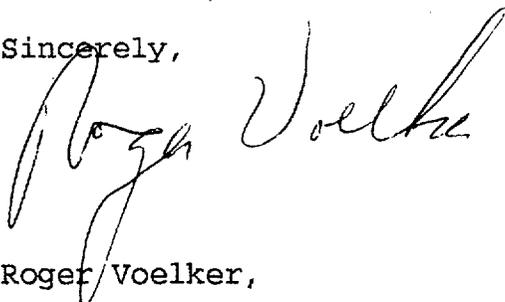
Regarding the proposed rule requiring training on employee protection regulations for supervisors, managers, and directors:

This rule is needed to protect nuclear plant workers who conscientiously raise safety concerns. Current NRC regulations are supposed to protect these workers from harassment and intimidation. Unfortunately managers who fire and/or discriminate against whistleblowers often escape responsibility for their actions by claiming they didn't know their actions were illegal. The proposed rule would remove this "ignorance of the law" excuse.

In short, these two rules are essential to:

- prevent fatigue from impairing nuclear plant worker performance
- prevent fatigued workers from repairing, inspecting, and testing safety equipment when nuclear power plants are operating or shut down
- prevent fear from causing nuclear plant workers to remain silent about safety problems
- prevent supervisors, managers, and directors from using "ignorance of the law" as a shield for their illegal actions
- protect the public and the environment from a nuclear power plant accident

Sincerely,



Roger Voelker,
Citizens Action Coalition of Indiana