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December 3, 1999

OFFICE OF THE  
ADJUTANT GENERAL

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

Dear Sir :

I write in affirmation of the proposed Rules Change for workers in nuclear plants.

The first is to provide rules for safeguard against fatigue. I have recently discovered a striking example of the problems with sleep deprivation and fatigue. We have an interchange in Santa Cruz County which is thought to be unusually dangerous. In my review of accidents recorded by the California Highway Patrol at the site, I found that over half of the accidents occurred in the hours from 12 noon to six PM, one-quarter of the day. This could not be accounted for by direction of travel nor by rush hours. We were fortunate that none of these accidents were fatal. The need for bus drivers to rest is legally recognized; the need for workers in nuclear power plants are as crucial as a public health measure. The Exxon Valdez disaster would have been prevented by observance of such restrictions.

The other rule is about "whistle-blowers" which is a problem of long-standing. I have no personal anecdotes but have followed this going back to *Whistle-Blowing at BART*, which had local implications to us in the Bay Area.

Thank you very much .

Sincerely,

*David H. Walworth*  
David H. Walworth, MD emeritus

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