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USNRC

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

OFFICE
OF
ADMINISTRATION

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Dear Commission Secretary:

Please support both proposed rules (below) to ensure that the first line of defense is staffed by workers who are free from both fatigue and fear of illegal discrimination. 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.

Proposed Rule #1 - Establish limits on employee working hours at nuclear power plants:
This rule will make the NRC guard against human performance degradation from fatigue just as it has done for drug and alcohol use since the mid 1980s. With the onset of electric utility restructuring, nuclear power plant owners face pressure to slash operating costs, forcing plant owners to reduce staffing levels. The remaining staff members must work longer and longer hours. Numerous studies have concluded that fatigue impairs human performance. Human performance problems contributed to the nuclear accidents at Three Mile Island and Chernobyl. Despite this evidence, the NRC has no regulations against excessive overtime and frequently looks the other way when plant owners abuse the agency's overtime guidelines.

Proposed Rule #2 - Training on employee protection regulations to supervisors, managers, and directors:
The second proposed rule will protect nuclear "whistleblowers" - the plant workers who conscientiously raise safety concerns. The NRC's regulations are supposed to protect these workers from harassment and intimidation. Unfortunately, the agency consistently fails to enforce these regulations based on the flimsy rationale that the individuals who fire and discriminate against whistleblowers don't know that these actions are illegal. The rule removes this "ignorance of the law" excuse by requiring nuclear plant owners to train supervisors and managers on the employee protection regulations.

Thank you.

Sincerely,

Mark M Giese
MG/mg

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