

December 3, 1999

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Secretary of the Commission (64FR67202)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

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USNRC

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Dear Sir:

I am writing to ask the NRC to support proposed rules to ensure that the line of defense against a nuclear accident is staffed by workers who are free from both fatigue and fear of illegal discrimination.

Please establish limits on employee working hours at nuclear plants which will guard against human performance degradation from fatigue. The NRC needs to set regulations against excessive overtime.

In addition please require training on employee protection regulations for supervisors, managers and directors.

Plant workers who conscientiously raise safety concerns need to be protected from harassment and intimidation. Remove by this rule the shield of "ignorance of the law."

These 2 rules are necessary to prevent fatigue from impairing nuclear plant worker performance; to prevent fatigued workers from repairing, inspecting, and testing safety equipment when nuclear power plants are operating or shut down; to prevent fear from causing nuclear plant workers to remain silent about safety problems; to prevent supervisors, managers, and directors from using "ignorance of the law" as a shield for their illegal actions; and to protect the public and the

environment from a nuclear power plant accident!

The Federal government imposes working hour limits on truck drivers and airline pilots to protect the public from fatigued workers. 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.

In addition, the NRC needs to hold individuals accountable for breaking employee protection regulations - something it has rarely done. "Ignorance of the law" is not a viable defense in any other US legal proceeding - it should not be a valid excuse in these cases. Non-existence of fines is an ineffective deterrent - the risk/reward balance is heavily tilted towards law-breaking managers at the expense of law-abiding workers. Personal accountability will be far more effective in reducing harassment and intimidation against nuclear workers than the occasional fine against companies.

Please put these two rules in effect - (1) limits on employee working hours at nuclear plants, and (2) training on employee protection regulations to supervisors, managers, and directors.

Sincerely yours,

Amanda Brown 12/3/99