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December 7, 1999

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

OFF  
ADJ

Re: Proposed rules on working hours limit and  
employee protection training

Dear Secretary:

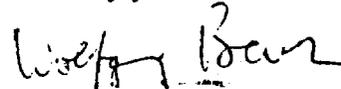
I would like to urge the Nuclear Regulatory Commission to support both proposed rules.

There are Federal limits on working hours for truck drivers and airline pilots to protect the public from fatigued workers. Several studies have confirmed the common sense expectation that tired people are more likely to make mistakes. The potential for a devastating disaster caused by human error in a nuclear power plant certainly is larger than the damage a truck driver might cause. So it is reasonable to protect the workers, and thereby the public, against excessive overtime. Such a rule must apply to all personnel at all times.

The second rule deals indirectly with the protection of whistleblowers. There are presently Commission rules protecting such employees, but these rules are used in a half-hearted manner. I find it unbelievable that the Commission does not act against individuals breaking these rules because they do not know about them. Where is 'ignorance of the law' a valid defense? No court will accept "I didn't see the posted speed limit". By mandating that all supervisory personnel be trained on employee protection regulation you will ensure that potential whistleblowers feel safe to actually call attention to problems. Past experience is ample proof that such public warnings are needed.

The overall safety record of nuclear power plants is not bad. But the potential harm of an accident is enormous. Therefore stringent safety measures are absolutely necessary. Workers constitute the first line of defense against such mishaps. Therefore, in my opinion, the proposed rules are eminently reasonable.

Sincerely yours,



Wolfgang Benz