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Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
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Colleagues:

I write in support of proposed rule changes which would (1) limit employee working hours at nuclear plants and (2) provide for training of supervisors on employee protection against harassment and intimidation.

1) Fatigue from working excessive hours--or simply from staying awake for excessive hours--has been shown to be as deleterious to performance as blood alcohol levels in excess of accepted guidelines. At present, only a certain few nuclear-plant workers are covered by guidelines limiting their working hours--and that protection is only in the form of guidelines, guidelines which apply only during "up" periods of plant operation.

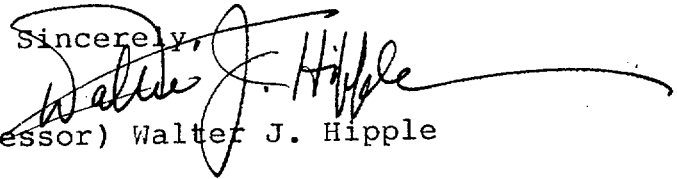
What is needed--and what the proposed rule change provides--is mandatory limits on working hours for all employees whose performance is pertinent to safe maintenance and operation of nuclear plants, whether the plants are "up" and running or shut down. Human error has been a factor in numerous nuclear accidents and near-accidents, and this safeguard against undue fatigue is one way of minimizing the risk of human error.

2) In the nuclear industry even more than in others, "whistle-blowers" may act as protectors of public safety--and they have in fact done so in numerous cases. There is inadequate protection of the "whistleblowers" themselves, however; the few fines levied against the nuclear companies which have harassed such employees are negligible from the standpoint of those big-budget companies, and the individual personnel responsible for the harassment have not been targeted. They can always plead "ignorance of the law."

The proposed rule provides for training of all management personnel to understand the role of "whistleblowers" and the legal protection due to them. Management personnel would thus be individually responsible for their conduct in such matters.

Both of these rule changes seem eminently sensible in providing for increased safety in the nuclear industry, an industry where unsafe practices could have catastrophic consequences. I urge the Nuclear Regulatory Commission to adopt them.

Sincerely,



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