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

OFFICE OF THE
GENERAL
ADJUTANT

Gentlemen: RE: Working hours proposed rule published December 1, 1999,
in the Federal Register

I support the proposed rule being imposed. The existing NRC guideline limiting control room workers and key maintenance personnel in nuclear power plants to 16 hours work per day and 72 hours per week has no enforcement authority. The guideline does not cover safety inspectors, engineers, and other plant workers; it should. Worse still, the guideline excluded coverage of nuclear power plants during refueling outages, which is when plant workers have most often been obliged to put in 12 to 16-hour days for weeks on end.

With deregulation of the electric utility industry, utility management has strong financial incentives to lower staffing costs if a legal means of doing so is available. A worker who has been at work for 17 hours is as degraded in performance as if he had a blood alcohol level of 0.05%. We do not need impaired, stressed nuclear power workers refueling or operating nuclear power plants. The public welfare and safety is served by having enforceable rules which prevent imposition of undue overtime on nuclear power plant workers whenever they are working with nuclear fueling or operations.

Sincerely yours,



Richard Lance Christie

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