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

OFFICE OF THE
GENERAL COUNSEL
ADJUTANT GENERAL

Dear Mr. Secretary:

I am writing to ask you to support the two proposed rules regarding establishing limits on employee working hours at nuclear power plants and for training of supervisors, managers, and directors on employee protection regulations.

Safety should be the primary consideration in the operation of a nuclear power plant. It has been demonstrated that fatigued workers are more likely to make mistakes than rested, more alert workers are. Documented studies have shown that being awake for 17 hours has the same adverse effect on human performance as having a blood alcohol concentration (BAC) of 0.05%. Current NRC regulations prohibit workers with a BAC greater than 0.04% from nuclear power plants. Current guidelines limiting workers to 16 hours a day and 72 hours a week applies only to a very narrow group of workers (control room operators and key maintenance personnel). These guidelines should also apply to safety inspectors, engineers and other plant workers not covered by these guidelines.

There should be a complete overhaul in the way employees with safety concerns are treated. No employee should feel threatened or be fearful about management retaliation for merely expressing their concerns with respect to safety issues. Current NRC regulations to protect these workers from harassment and intimidation are inadequate. To address this, there needs to be training and re-orientation of all management employees with respect to these issues so that "ignorance of the law" cannot be an excuse. The NRC should impose harsh sanctions on the managers and the companies who have broken the employee protection regulations.

The NRC needs to remember that one of its main objectives is to keep nuclear power plants as safe as possible. A nuclear "accident" is unacceptable with all the industry has learned over the past four decades. Workers who are rested and who do not have fear of illegal discrimination will be able to do their jobs in a careful and safe manner. Passing these two rules will insure an added degree of safety for the public and the environment.

Sincerely,

Dave Dolnick

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