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

OF  
ADJ

Dear Secretary:

It is my understanding that the Nuclear Regulatory Commission will reach decisions on two proposed rules in the near future. The first rule has to do with employee fatigue due to excessive overtime, which can degrade human performance and contribute to nuclear accidents. The second rule is in regard to training on employee protection regulations for management employees. This proposal would protect nuclear "whistleblowers" against harassment, intimidation or being fired, where ignorance of the regulations is used by management as an excuse.

To prevent worker fatigue, strict regulations on overtime requirements, whether the plant is operating or shut down for maintenance, are necessary to assure safe and proper operation and maintenance of equipment in nuclear plants. Studies have shown that being awake for 17 hours has the same adverse effect on human performance as having a blood alcohol level of 0.05%, yet NRC regulations ban workers with blood alcohol levels greater than 0.04%. The Federal government imposes working hour limits on truck drivers and airline pilots to protect the public from fatigued workers. Is not the operation of a nuclear plant even more critical to public safety?

Regarding the protection of "whistleblowers," who call attention to unsafe conditions in nuclear plants, the NRC needs to institute a mandatory policy where all supervisors, managers and directors are trained in the regulations on protection of employees against discrimination. Safety concerns raised by whistleblowers led to the wise but premature closure of the Yankee Rowe and Maine Yankee nuclear power plants.

I respectfully urge you to support both proposed rules to ensure that the first line of defense is staffed by workers who are free from fatigue and fear of illegal discrimination.

Sincerely:

*Elliott Krackhardt*  
Elliott Krackhardt

PDR PRM 26-2

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