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December 15, 1999

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DOCKETED
USNRC

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

DOCKET NUMBER

PETITION RULE PRM 26-2
(64 FR 67202)

'99 DEC 20 P3:19

OFFICE OF THE
GENERAL COUNSEL
ADVISOR

I am writing to urge the NRC to adopt Proposed Rules #1 and #2 which would establish limits on employee working hours at nuclear power plants and would require training on employee protection regulations for supervisors, managers and directors.

Rule #1 is needed to:

- (1) prevent fatigue from impairing nuclear plant worker performance;
- (2) prevent fatigued workers working on safety equipment during operation or shutdown.

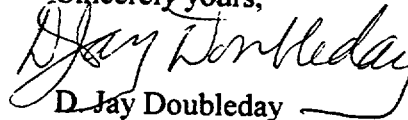
Rule #2 is needed to:

- (1) encourage nuclear plant workers to freely discuss safety problems;
- (2) prevent managers at all levels from using "ignorance of the law" as a shield for illegal activities;
- (3) protect the public and the environment from nuclear power plant accidents.

The airwaves are full of talk about accountability. It is time to stop the nonsense where companies are given fines that are not serious penalties and the individuals responsible for violations of policies and rules go scot free on the ground that they are "ignorant of the law." The training program should absolutely eliminate this weak excuse and the lack of accountability that results.

Thank you for the opportunity to present my views.

Sincerely yours,


D. Jay Doubleday

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