

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

13 December 1999

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USNRC

'99 DEC 20 P3:19

Dear Commissioners;

This letter is written to let you know I support the two proposed rules being considered that are intended to improve safety of nuclear power plants and to help insure that nuclear workers are an effective first line of defense against nuclear accidents.

It is disheartening to think that in an industry as sophisticated, technical and sensitive as nuclear power rules must be promulgated concerning limits of working hours and protection from harassment for employees who conscientiously raise safety concerns. However, having spent 40 years associated with the "medical industry" this does not surprise me.

Everyone knew that fatigued, sleep deprived doctors made more mistakes. Nothing was done. During the 1970's and 1980's numerous studies demonstrated the deterioration of signal recognition, problem solving, short term memory, judgment and motor skills as fatigue and length of sleep deprivation increased. Indeed there developed a significant degree of paranoia in study participants at prolonged periods of fatigue and sleep deprivation, even when they knew it was only a controlled, simulated situation. Nothing was done. Now that the national media has publicized the frequency and cost of medical errors and identified fatigue and lack of sleep as one of the factors maybe something will be done.

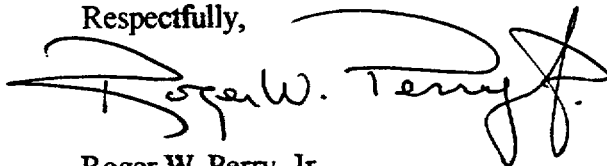
The Federal Government has seen fit to impose working hour limits on truck drivers and airline pilots to protect the public from fatigued workers. I believe it is time to impose working hour limits on employees of nuclear power plants that can be enforced whether plants are running or not.

As to "whistleblower protection" I feel that to allow "ignorance of the law" to be an excuse is ridiculous and should not have to be an issue. However since it is, then mandatory training for management should be required. Tell them what you are going to tell them---tell them harassment and intimidation is illegal---tell them what you told them and then make them write it on the blackboard 100 times. Personal accountability will be far more effective than the occasional, inadequate fine against companies.

Living in Maine we feel lucky that concerned workers stepped forward to raise safety concerns that played a role in the premature closing of Maine Yankee. We do not need another Three Mile Island or Chernobyl.

Thank you for your time.

Respectfully,



Roger W. Perry, Jr.

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