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

DUCKET NUMBER
PETITION RULE PRM 26-2
(64FR67202)

Dear Secretary:

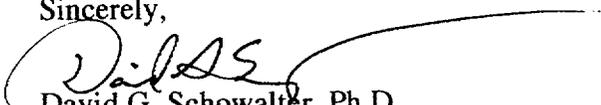
I am writing to you in support of two proposed rules before the commission. The first is a rule to establish limits on employee working hours at nuclear power plants. The second concerns training on employee protection regulations to supervisors, managers, and directors.

Recent scientific studies have shown that being awake for seventeen hours has the same adverse effect on human performance as having a blood alcohol level of 0.05%. Regulations implemented by the NRC ban workers with a blood alcohol level greater than 0.04% from nuclear power plants. Although NRC guidelines enacted in 1982 limit workers to sixteen hours per day and seventy-two hours per week, this applies only to control room operators and key maintenance personnel, not to managers, safety inspectors, engineers, and other plant workers. Even for the control room operators, the NRC has no authority to enforce these limits because they were only enacted as guidelines. Given the potential risks of human error at nuclear power plants, I implore you to impose and enforce working hour limits at nuclear power plants.

Currently, a manager or supervisor illegally firing a worker who raises safety concerns can do so with impunity due to a loophole known as "ignorance of the law." Although a power plant can be fined for such behavior, there is no way to enforce personal accountability. This loophole can be closed by requiring supervisors, managers, and directors in the nuclear industry to be trained on employee protection regulations. I believe it is imperative that this new rule be enacted.

Nuclear power is a very important source of power in this country. It is also one of the most dangerous. The above rules provide relatively simple avenues for ensuring that the industry follows safe practices.

Sincerely,


David G. Schowalter, Ph.D.

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