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Secretary of the Commission
U.S. Nuclear Regulatory Commission
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I am writing today to urge you to implement two proposed rules regarding working conditions at Nuclear Power plants

Proposed rule #1. Establish limits on employee working hours at nuclear power plants. Worker fatigue can seriously impair good judgment and the ability to perform manual tasks without making grave mistakes. I know from experience driving that even modest levels of fatigue can have dangerous effects on the ability to perform adequately. The transportation department just released a study concluding that there are 1500 driver fatalities each year due to fatigue. Why would we want tired workers handling spent fuel at nuclear power plants during a refueling outage? Human performance problems contributed to the nuclear accidents at Three Mile Island and Chernobyl. Why do we continue to take risks by allowing Utility companies to require massive overtime from nuclear plant workers?

Proposed rule #2. Train plant supervisors, managers, and directors on the existing rules protecting whistle blowers from harassment and intimidation. Rules that allow managers retaliate against whistle blowers by claiming ignorance of the laws is ridiculous. No where else is this nation built on the rule of law is "ignorance of the law" a valid defense. Why should it be so in such a dangerous area of endeavor as the safe operation of a nuclear power plant? This is beyond comprehension. It seems that the NRC is entirely beholden to the moneyed interests of the electric power industry.

The implementation of these rules are absolutely necessary to:

- prevent fatigue from impairing nuclear plant worker performance
- prevent fatigued workers from repairing, inspecting, and testing safety equipment when nuclear power plants are operating or shut down
- prevent fear from causing nuclear plant workers to remain silent about safety problems
- prevent supervisors, managers, and directors from using "ignorance of the law" as a shield for their illegal actions
- protect the public and the environment from a nuclear power plant accident

I think that the role of the NRC should be to shepherd the United States through this dangerous period, to see to it that our nuclear power plants are managed in the safest manner possible until they are all shut down, decommissioned and entombed. After this the NRC can put its considerable talent into helping to design and operate the many solar power plants that will be using by then.

Adopting these two proposed rules will help insure this bright future.

Thank You,

David Buchner

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