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

OFFICE
 ADDRESS

Attention: Rulemakings and Adjudications Staff

DOCKET NUMBER

Comment Re: Docket PRM-26-2

PETITION RULE PRM 26-2
 (64FR67202)

Nuclear power plant accidents have the potential to injure large amounts of people & cause long lasting damage to the environment, therefore it is very important to take strong measures to insure safety. The workers at these plants are on the front lines in preventing an accident. It is the workers who must be able to prevent accidents, & who will be the ones managing the mitigation if an accident occurs.

Like all critical workers, whether health care workers, air transport controllers & pilots, operators of heavy equipment, indeed all humans; nuclear power plant workers suffer deterioration of performance & judgment in a predictable fashion due to fatigue. Limits on hours worked are a critical safety issue.

As electric utility restructuring proceeds, nuclear power plant owners are under pressure to reduce operating costs. As staff is reduced to reduce costs, the remaining staff members must work longer. Human fatigue contributed to the nuclear accidents at Three Mile Island and Chernobyl. It is important for the NRC to make regulations that prevent excessive overtime for all workers that conduct inspections, work in the control room, or do critical maintenance.

Please engage in rule making that requires adherence to reasonable limits on hours worked. This will prevent fatigue from impairing nuclear plant worker performance and prevent fatigued workers from repairing, inspecting, and testing safety equipment when nuclear power plants are operating or shut down. The operations that occur when the plant is closed down can be just as critical to its safe operation as those when it is operation, & worker fatigue is still important & must be prevented. This issue is too important to be left to toothless guidelines.

The Federal government imposes working hour limits on truck drivers and airline pilots to protect the public from fatigued workers. I believe it is necessary to impose working hour limits on employees at nuclear power plants that can be enforced whether plants are running or not.

PDR PRM 26-2

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Peace,
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