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

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Attention: Rulemakings and Adjudications Staff

Comment Re: Docket PRM-26-2

OFF

ADJ.

As a Licensed SRO, I support a more descriptive regulation on working hours for nuclear plant workers. Some utilities have pushed the limits of the current overtime rule to the point where error likely situations are (have been) present. This proposed rule change by Mr. Quigley is not unreasonable and may help the industry better understand the benefits of an attentive and motivated workforce.

I suggest the following changes to the proposed rule change:

1. (1).a.i. – Allow 72 hours per week. This will allow those on 12-hour shifts to cover two extra days, if needed.
2. (1).a.ii. – Allow 132 hours per two-week period. This would allow #1 above, followed by a week where one extra day could be worked.
Both of these conditions should be available to ensure a “quality of life” environment for such things as vacation, family & personal illness, special and/or exceptional circumstances, etc. Those available to work these hours should equalize the time to the extent possible.
3. (1).b.ii. – Outages are generally becoming shorter duration. Allowing 144 hours per two-week period is acceptable for these times. This equates to a six-day workweek for those on 12-hour shifts. Often, this amount may not be required, but should be available to workers.

During the scope of outages, a prepared workforce is trained and energized to perform in a certain style that is significantly different to that online. In times of complicated and coordinated projects, mistakes can be introduced by those new (i.e. being “out of the loop” during lengthy time off) to the project as likely as those with a requisite one day off. This is the exception, not the rule, but one that must be considered in a rulemaking change.

4. Do not include references to sleep disorder symptoms (as in (3).a.iii.) as this is a medical condition that should only be diagnosed by a medical professional. I agree to including disclosure on NRC Form 396 for *known* conditions.

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PDR PRM 26-2

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