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USPAC

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington D.C.
Attention: Rulemaking and Adjudications Staff

'00 FEB 14 A11:17

Subject: 10 CFR Part 26 (Docket No. PRM-26-2)
NRC Generic Letter 82-12 rulemaking change

OFFICE
OF
ADJUDICATION

Dear Sirs,

As an active RO license holder, I urge you to make the changes as requested by the petitioner concerning overtime hours. Over the past eleven years, I have seen my overtime hours steadily increase. And, although this overtime was still within the limits of GL 82-12, there is so much ambiguity, it does not prevent the misuse of overtime on a day-to-day basis. How do you define "routine" and "heavy use of overtime"?

Even though the objective of a "40 hour week while the plant is operating" is clearly stated in the current 82-12 letter, overtime is quite common and the general feeling is that as long as the specified hours are met, we are in compliance. This mindset then leads to many 72 hour weeks and 16 hour shifts. I personally have had documentation made to my personnel file for refusing to work an eight hour day shift following an eight hour night shift. This is a situation a nuclear plant worker should not even be put in.

In closing, I feel the job we do is too important to not take the risk of fatigue seriously and, that it is imperative to the safety of the industry to update the overtime rules rather than being governed by a generic guideline that is almost twenty years old and outdated.

Sincerely,

James Lemke, Reactor Operator

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