

DOCKET NUMBER

PETITION RULE PRM 26-2
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To: Nuclear Regulatory Commission

RE: Docket No. PRM-26-2

I would like to comment on a petition for rulemaking dated September 29, 1999, by Mr. Barry Quigley, assigned Docket No. PRM-26-2.

My name is Robert Kline, I am employed by Pacific Gas and Electric Company (PG&E) as a Control Operator at Diablo Canyon Power Plant, Avila Beach, California. I have been employed by PG&E since 1979. I received a Reactor Operators license in 1983, and a Senior Reactor Operators License (SOP-50225) in 1986. I have been in on-shift operations for more than 20 years.

I am in disagreement with the proposed changes of PRM-26-2, specifically limiting the hours worked by licensed personnel. Mr. Quigley cites National Transportation and Safety Board (NTSB) statistics to support his theories. Comparing the NTSB's statistics to the NRC's statistics is the equivalent of comparing apples to oranges. Airline pilots and long-haul truck drivers are away from home during their work periods. Their sleep and meal patterns are disrupted. Nuclear Power Plant personnel return to their homes following their work periods, and follow their normal sleep and meal patterns.

It is a rarity when any operating personnel are assigned a mandatory overtime shift at Diablo Canyon. Personnel are excused from work 100% of the time if they feel fatigued, or unfit for duty. Management at Diablo Canyon are required to monitor shift operating personnel for fatigue and fitness for duty, and excuse same personnel if fatigue is an issue.

Diablo Canyon Operations went away from working 8 hour shifts, in favor of 12 hour shifts, many years ago. Operations personnel are limited to working 12 hours in a 24 hour period, with a required 12 hour period off work prior to beginning a 12 hour shift. This eliminates the problem of fatigue associated with working a 16 hour shift.

Limiting the working hours of Licensed Operators beyond the currently established limits will have a negative impact on the Licensee during outage periods, as extra personnel are required to perform all of the operations necessary to refuel the plant, and perform the required testing to return the Unit to service. Limiting the number of Licensed Operators available will delay restart of the Unit.

Additional limits on working hours will also cause a loss of income to some licensed personnel, who work additional shifts to cover for vacations, or other absences on-shift.

Please do not hesitate to contact me with any questions. Thank you for your time.

Robert Kline

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