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PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

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OFFICE OF
ADJUDICATION

February 14, 2000

Secretary
U.S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

DOCKET NUMBER
PETITION RULE PRM 26-2
(64FR67202)

Subject: Comments Concerning "Petition for Rulemaking to Address Fatigue."
(64FR67202, dated December 1, 1999)

Dear Sir/Madam:

This letter is being submitted in response to Nuclear Regulatory Commission's request for comments concerning "Petition for Rulemaking to Address Fatigue" that was published in the Federal Register (64FR67202, December 1, 1999). The petition states that as companies downsize, there are fewer people to do the required work, resulting in increased overtime. The petitioner requests that the Nuclear Regulatory Commission (NRC): (1) Add enforceable working hour limits to 10 CFR Part 26; (2) add a criterion to 10 CFR Part 55.33 (a)(1) to require evaluation of known sleeping disorders; (3) revise the Enforcement Policy to include examples of working hour violations warranting various NRC sanctions; and (4) revise NRC Form-396 to include self-disclosure of sleeping disorders by licensed operators. The petitioner also requests changes to NRC Inspection Procedure 81502, Fitness for Duty Program. The petitioner believes that clear and enforceable working hour limits are required to ensure that the impact of personnel fatigue is minimized.

PECO Energy appreciates the opportunity to comment on the "Petition for Rulemaking to Address Fatigue." PECO Energy supports the comments submitted on behalf of the nuclear energy industry, by the Nuclear Energy Institute.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

James A. Hutton, Jr.
Director - Licensing

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