

DOCKETED
USNRC

21

To: The NRC

November 2, 2005 (3:57pm)

10-29-05

From: Jim Pulley

RR#1 Box 219A

Warrensburg, IL 62573

pulljr@webaroonie.net

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

DOCKET NUMBER
PROPOSED RULE 26

Subj: Nuclear Plant worker fatigue and proposed changes to 10CFR26.

(70FR 50442)

I am a rotating shift worker at the Clinton Power Station in the operations department. I have been informed by one of my Supervisors that we will be going to a twelve hour rotating schedule because of the changes coming in the near future with the 10CFR26 regulations because of the NRC's concerns with worker fatigue.

I am pleased that the NRC is concerned about workers and fatigue they experience, but after review of the draft proposed changes I am concerned that your fix falls short of accomplishing it's goal.

Many case studies have been performed in our lifetime by Medical Professionals that conclude that after 10 consecutive hours of work, all human functions diminish.

The NRC's proposed changes only address the tailend of the fatigue cycle. Your proposed changes should also address limiting the consecutive number of hours worked to Ten Hours. DOT regulations put into effect within the last five years have addressed this concern with over the road truck drivers. Work at a Nuclear Power Plant does require workers be physically and mentally alert. The NRC needs to address this issue completely to best assure the goal of all workers at Nuclear Facilities are not fatigued while engaged with work activities is attained.

Template = SECY-067

SECY-02

From: Carol Gallagher
To: Evangeline Ngbea
Date: Wed, Nov 2, 2005 11:12 AM
Subject: Comment letter on FFD proposed rule

Van,

Attached for docketing is a comment letter on the above noted proposed rule from Jim Pulley that I received on 10/29/05.

Carol

Mail Envelope Properties (4368D639.7EA : 3 : 886)

Subject: Comment letter on FFD proposed rule
Creation Date: 11/2/05 10:07AM
From: Carol Gallagher

Created By: CAG@nrc.gov

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ESN (Evangeline Ngbea)

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