

December 2, 2005 (11:05am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Comments regarding Fitness For Duty Program (part 26)

As I applaud the NRC for the strides it is taking regarding Fatigue of Workers, I feel there are some shortcomings that need to be addressed.

29

1. By including the proposed Fatigue of Power Plant workers rule into Fitness for Duty rule, it makes even more obvious the question why workers who do not work on equipment related to public health and safety not be impaired from alcohol or drugs, but it is acceptable to be impaired from fatigue? If their presence onsite while impaired from alcohol or drugs constitutes a risk to nuclear safety, why are they not a risk when they are impaired from fatigue?
2. Why is it that the truck driver that delivers items to our plant has more work hour restrictions than the people that operate it or maintain it?
3. Rules need to be in place and followed to the letter, instead of being twisted to suit them by the utilities. People that are fatigued do not always realize it. If I drank 6 alcoholic beverages and told you I had zero impairment, you would obviously think that the alcohol clouded my judgement to the point where I did not realize I was being affected. Doesn't this same principle apply when you are impaired from fatigue?
4. Why are turnover times excluded from counting as work hours, especially when a lunch break is? Are they not work? Some plants attempt to count 2 turnovers per shift, usually in a meeting format, or sometimes even when there is no face to face turnover at the end of your shift.
5. Everyone seems to forget how big a part fatigue played in TMI in 1979. Fatigue problems will only be getting worse due to deregulation and downsizing, aggravated even more by the aging work force at most Nuclear plants in this county, which in itself is a sign of no new, younger people getting hired. Left unchecked, the entire industry may return to the cycle of where it was in the 1970's.

Anonymous

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SECY-02

**From:** Carol Gallagher  
**To:** Evangeline Ngbea  
**Date:** Fri, Dec 2, 2005 9:56 AM  
**Subject:** Comment on Fitness-for-Duty Proposed Rule

Attached for docketing is a comment on the above noted proposed rule from an anonymous commenter that I received via the rulemaking website on 12/01/05.

Carol

**Mail Envelope Properties (4390607C.575 : 3 : 886)**

**Subject:** Comment on Fitness-for-Duty Proposed Rule  
**Creation Date:** 12/2/05 9:55AM  
**From:** Carol Gallagher  
**Created By:** CAG@nrc.gov

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