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T. Lieberman

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RULES REVIEW
USNRC



62FR 8785
Feb 26, 1997

(57)

**International Brotherhood of Electrical Workers
LOCAL UNION 97**

Central Division

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Mike Kenific
Business Representative
I.B.E.W. Local 97
Oswego, New York 13126

Mr. David Mayer
Chief Rules Review and Directives Branch
Division of Freedom of Information and Publication Services
Office of Administration, Mail Stop T6D59
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Public Comment on NRC Proposed Strategies to Address Need for Safety Conscious Work Environment.

Dear Mr. Meyer:

We support the N.R.C.'s proposed regulation in regards to the above issue.

We do not believe that the current regulations are adequate. Although we understand the current regulations do support employees freedom to identify and communicate potential safety concerns without retaliation, we do not believe the current regulations are adequate.

We share the Commissions view that although most concerns are resolved in the normal manner that individuals are being retaliated against for raising concerns. Although this retaliation is unacceptable and unlawful we support the Commissions knowledge and position that it still takes place.

In addition to the individual's concern we also support the Commissions position and knowledge that fellow workers have been intimidated and discouraged from raising concerns due to the treatment of a fellow employee, even if the employee in question has no reservations about raising future concerns, thus the chilling effect.

Retaliation can take many forms, most not easily detectable nor easily proved. The current regulations for addressing employee discrimination are clearly inadequate and do not promote employees to feel free to address safety concerns in all cases.

In closing we support the N.R.C.'s proposed standardized approach in light of the fact that plant

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Safety

safety is of utmost importance.

Sincerely:

A handwritten signature in cursive script, appearing to read "Mike Kenific".

Mike Kenific
Business Representative
I.B.E.W. Local 97