

Attachment B

From Anthony Rizzo, Jr. Salem and Hope Creek Nuclear Power Plants

Here are some changes I think should be made to the fatigue rule.

Supervisors, Armed Officers, Unarmed Officers should be monitored separately, the reason being is that the companies keep plenty of supervisors and unarmed (if that plant has unarmed officers) for their manning so when they are added into the mix with the armed officers it brings the total hours down.

The company should also break down the different shifts because one shift could be getting out of control overtime but the other shifts will bring the total hours down to make it appear that there is not much overtime.

The deviation forms must be filled out before the employee gets anywhere near the 72 hour mark not afterwards. The object is to catch employees before they get fatigued not after the fact. There is no reason an employee should go over 72 hours when you have a whole shift of employees to distribute the overtime equally.

The NRC must make sure that employees are not harassed when they say they are fatigued.

When there is more than one employee going over the fatigue rule that will tell you there are not enough employees or the company is just not tracking it right.

The only exception should be emergencies, systems failure, state of emergency things like that which is already allowed for in the rule.