



**American Federation
of Labor and
Congress of Industrial
Organizations**

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AMERICA'S UNIONS

February 4, 2026

Theodore J. Garrish
Assistant Secretary for Nuclear Energy
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington D.C. 20585

**Re: Worker Safety and Health Requirements To Support Reform of Nuclear
Reactor Testing, Docket No. EPA-HQ-2025-0243**

Dear Assistant Secretary Garrish,

The American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) requests a 45 day extension of the comment period for the Department of Energy's notice of proposed rulemaking (NPRM) regarding amendments to regulations on worker safety and health protections during the review, approval, and deployment of nuclear reactors.

The AFL-CIO's membership is expansive and diverse, with many workers and their families directly affected by the proposed rule. We represent 64 national labor unions with nearly 15 million working members across a wide variety of industries in energy, construction, emergency response, transportation, utilities, and many other sectors. The effects of the proposed rule are complex in nature and require time to parse out, including scope and jurisdiction coverage for our affected membership, in addition to the worker safety and health amendments. More time is needed for careful review and coordination across our affiliates to establish thorough and informed comments.

Thank you for your consideration of this important request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chenay Arberry". The signature is fluid and cursive, with the first name "Chenay" and last name "Arberry" clearly distinguishable.

Chenay C. Arberry
Senior Safety and Health Specialist, AFL-CIO

A handwritten signature in black ink, appearing to read "Rebecca L. Reindel". The signature is cursive and somewhat stylized, with the first name "Rebecca" and last name "Reindel" being the most prominent parts.

Rebecca L. Reindel, MS, MPH
Safety and Health Director, AFL-CIO