

Process for Developing Fatigue Management Guidance

Public Teleconference
June 5, 2012



Purpose

To discuss the draft guidance development process for the ongoing Part 26 Subpart I (Managing Fatigue) proposed rulemaking effort.

Agenda

- Opening Remarks
- Options for Guidance Development
- Open Discussion

Current Status

- Proposed Rule Phase
- 2 Public Meetings Held to Date
 - December 12, 2011 – Discussed scope and schedule
 - February 23, 2012 – Discussed topics of interest to industry
- Draft rule language for QC/QV personnel will be published in the very near future
- NRC staff is awaiting feedback on the following topics:
 - Work hour exception for Force-on-Force exercises
 - Changing the definition of “unit outage”
 - Work hour exception for plant emergencies
 - Work hour exception for natural events other than hurricanes

Guidance Background



- Regulatory Guide (RG) 5.73, “Fatigue Management for Nuclear Power Plant Personnel” describes a method that the staff of the NRC considers acceptable for complying with 10 CFR Part 26, Subpart I.
- RG 5.73 endorses, with certain clarifications, additions, and exceptions, the guidance document developed by the Nuclear Energy Institute (NEI), “Managing Personnel Fatigue at Nuclear Power Reactor Sites” (NEI 06-11, Rev. 1).

Options for Development



1. NEI submits revision of 06-11 to NRC for review and potential endorsement

OR

2. NRC Staff amend RG 5.73 with new sections

Guidance Revisions May Address



- Alignment with proposed rule changes to 10 CFR Part 26, Subpart I
- Existing RG 5.73 Additions, Clarifications, and Exceptions
 - If NEI 06-11 is Updated
- Alternative “54 Hour” Rule Guidance
 - Formal endorsement of addendum to NEI 06-11
 - Lessons learned from implementation
- Fatigue Management FAQs
- Public Comments
- Staff-Identified Clarifications

Additional Considerations

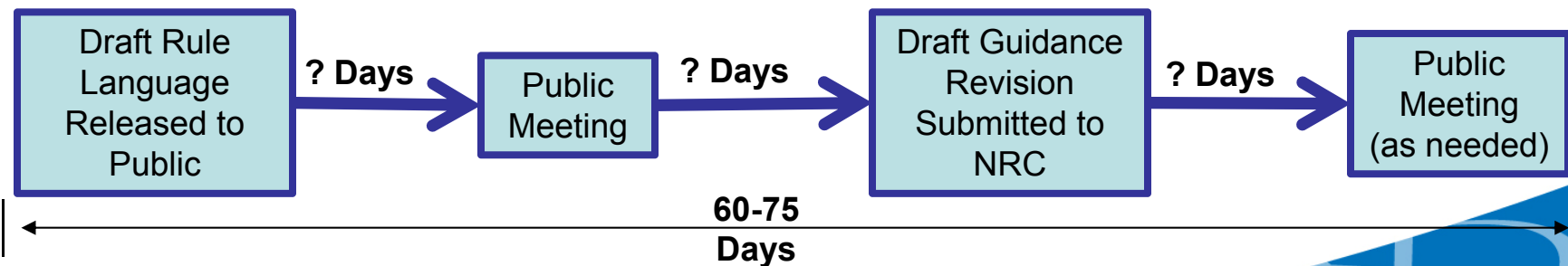
- Strict Schedule for Development
- Need to Develop Concurrent with Proposed Rule
- Plain Language
- Ease of Use

Current Schedule

- **December 2012:** Decision of how to proceed with guidance development (see options for development)
- **July 2013:** Deadline for completion of Draft Guidance
- **Spring 2014:** Proposed Rule and Draft Guidance released for public comment

Strategy for Coordinating Proposed Rule Language and Guidance Development

- NRC Staff plans for 4 public releases of draft preliminary rule language
 - E.g., June 2012, September 2012, January 2013, May 2013
- Following each release, NRC will host a public meeting to discuss rule language
- **If Option 1:** Industry will be expected to submit a draft guidance revision incorporating draft rule language shortly following public meeting
- NRC will host subsequent public meetings to discuss guidance as necessary



Discussion