

2009
FirstEnergy Nuclear Operating Company **fenoc**

Fatigue Management Rule Industry Perspective Future

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Objectives for Future

- **Manage fatigue through:**
 - Controlling work hours
 - Knowledge and awareness
 - Oversight with fatigue risk awareness
- **Rule simplification**
- **Address areas**
 - Not well synchronized
 - Poorly defined

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New Mindset for Success

- **Managing fatigue is important**
- **Change our mindset:**
 - Fatigue does not automatically occur if rule is exceeded
 - Rest is not the only barrier to a quality result
 - A fatigued person does not always makes errors
 - A rested individual is not always happy, productive, and safe if quality of life is not good
- **Must consider the many aspects of quality program**
 - Procedures, Peer Checks, Training, Tests, Verification, etc.

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Work Hour Rule Simplification

- **Minimum Days Off rule is complex**
 - To simplify compliance
 - No outage versus on-line distinction
 - Eliminate attempts at "one-rule fits all" shift-cycle structure
 - Eliminate inflexibility for quality of life concerns
- **Work hour ceiling limits are simple and proven**
 - Addresses both acute and cumulative fatigue
- **Rest periods easy to define**
 - Addresses both acute and cumulative fatigue
- **Regulation affects the personal lives of individuals**
- **Senior Management engagement must be earlier**

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Proposal To Replace MDOs

- **Revised ceiling limits**
 - Add limit of 846 hours per quarter/ Annual limit 2808 hours
 - Provides for approximately same range of number days off
- **Modify break limits**
 - 10 and 34-hour breaks immediately prior to work
 - Except if commuting to other than base location
- **Senior Management approval to exceed 54 hour weeks**
 - May need additional actions for consecutive weeks
 - Creates awareness/risk assessment

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Benefits

- **No accounting for days off**
 - Built into ceiling and break limits
- **No distinction of outage**
 - Use senior management risk assessment
- **No shift cycle needed**
 - Maximum hours distributed over quarter
- **Opportunity to always work rested**
- **Restores flexibility for quality of life**
- **Addresses acute and cumulative fatigue**

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Next Steps


- Industry alignment around proposal details
- Petition for rule-making
- Continue participation in industry task force
- Drive toward revised rule implementation



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Questions & Answers



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