

2009

FirstEnergy Nuclear Operating Company

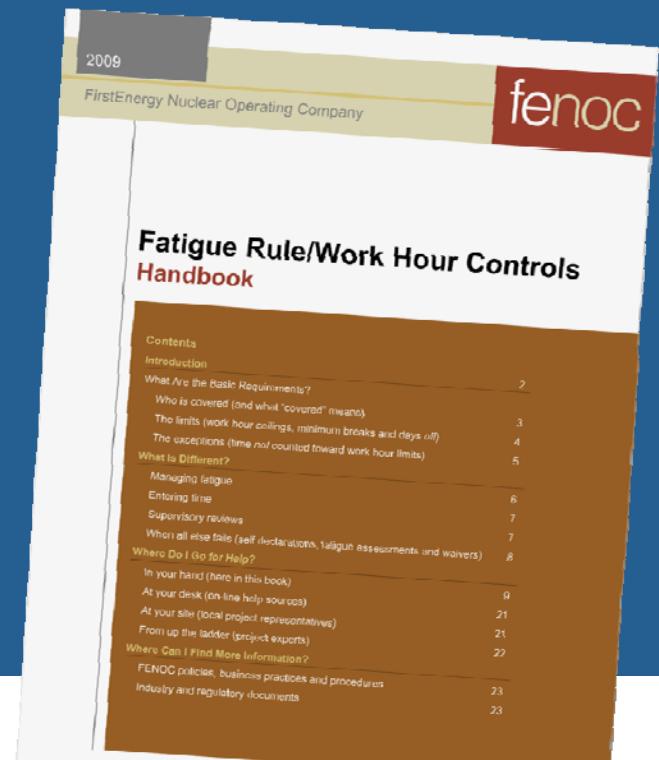
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Fatigue Management Rule

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

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.

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**

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

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**

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

