

2009

FirstEnergy Nuclear Operating Company

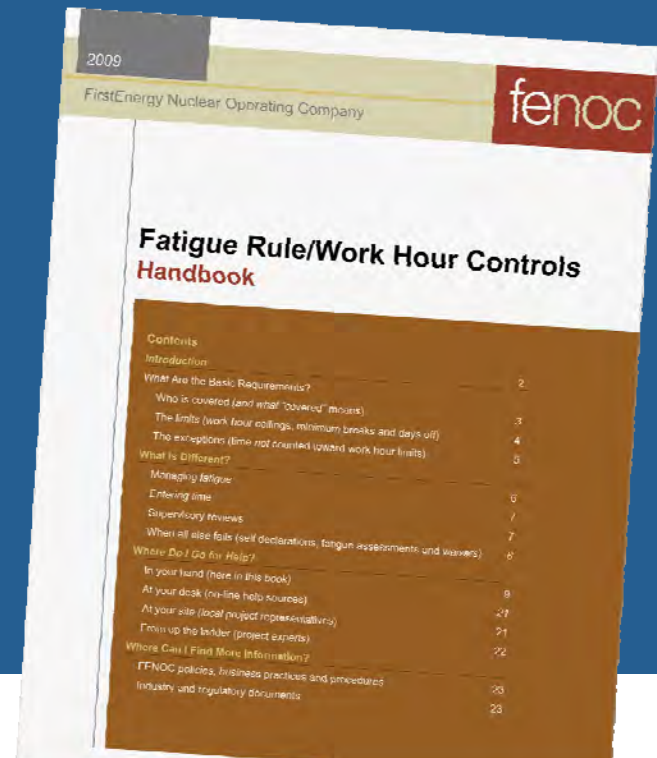
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# Fatigue Management Rule

## Industry Perspective Future

**Greg Halnon**  
Director, Regulatory Affairs

**NRC Regulatory Information Conference**  
March 9-12, 2010



# 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 780 hours per quarter
  - 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

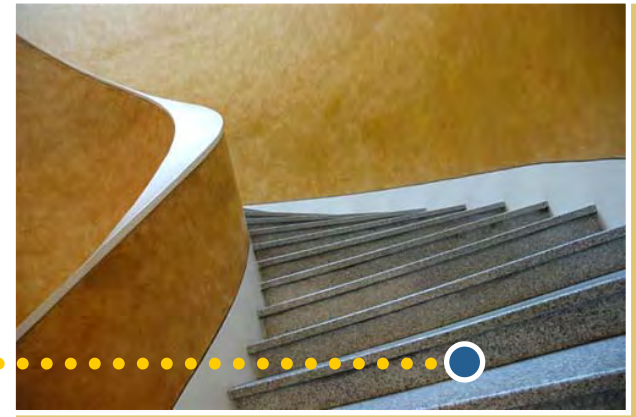
- May need additional actions for consecutive weeks
- Creates awareness/risk assessment

# 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

