

Fatigue Management Rule

Industry Perspective Past & Present

Don Rickard
STARS Regulatory Affairs



Discussion Points

- Overview
- Major Implementation Activities
- Implementation Issues
- Ongoing Rule Issues
- Performance Monitoring



Overview

- History
 - Issued on March 1, 2008
 - Subpart I effective on October 1, 2009 for operating reactors
- Intent
 - Manage acute fatigue
 - Manage chronic fatigue
 - Awareness of fatigue contributors
 - Provide means to self-declare
 - Records, Reporting and Audits
 - Provide requirements to self-correct issues
- Industry Guidance in NEI 06-11 Rev 1
- Reg Guide 5.73 endorsed NEI 06-11 with Exceptions



Major Implementation Activities

- Policy and Procedure Development
- Training and Examination
 - General knowledge requirements
 - Fatigue assessment
 - Self declaration
- Time Tracking Software
- Technical Specification Revisions
- Security Orders



Implementation Issues

- Meeting the Spirit and Intent of Fatigue Management
- Knowledge Retention
- Ongoing Software Impact
- Refuel Resource Impact
- Security Force on Force Drill Impact
- Reporting Criteria of 26.717 and 26.719
- Inspector Knowledge
- Review Panel Lessons Learned



Ongoing Rule Issues

- Definitions (or lack thereof)
- Rule Complexity
 - Minimum Days Off (MDOs)
- Quality of life issues
- On-going unsettled nature
 - Hurricane/Severe Weather staffing
 - Extended plant shutdown
 - "8 hr shift" definition
 - PROS petition
 - QC/QV rulemaking
- NRC Website FAQs



Performance Monitoring

- What are your PI's telling you?
- Monitoring for adverse effects?
- Post-implementation self-assessment?
- CAP Program performance
 - Rule says use CAP
 - Rule says trend CAP
 - Rule says resolve issues using CAP
- Waiver usage
- Self-declarations


