

# *Fatigue Management Rule*

Industry Perspective Past & Present

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# 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

