

Professional Reactor Operator Society (PROS)

Support to replace MDO

Introduction

- Mitch Taggart – Shift Manager at Callaway
- I am also the President of the Professional Reactor Operator Society, better known as PROS
- My role today is to represent PROS.
- I take that obligation seriously since I will be speaking for ~ 550 covered workers
- I have been the Lead for the PROS' response concerning Fatigue Management the last two years
- I was the Lead for the PROS' effort that resulted in a petition for rule change to redefine 'Unit Outage' and 'Outage Unit'

PROS History for some who may not be familiar with the organization

- PROS was founded in the early 80s by licensed operators for licensed operators
- PROS has a national Board consisting of a President, Vice President, Secretary, Treasurer and International Coordinator
- It is further structured with regional Presidents that coincide with the 4 NRC regions
- Each site has a Site Representative

Consequences PROS has experienced with MDO

- The first,
- At one site a SRO was called in for an urgent one hour meeting
- After putting the hour meeting into time tracking software, the one hour meeting resulted in a MDO violation
- The SRO was completely unaware of the violation prior to the meeting or even possibility of a violation until his time was entered into the software program

Consequences PROS has experienced with MDO

- Calculating MDO requires sophisticated software
- Without the MDO limitation, individuals and supervisors could monitor compliance without a computer program
- Operators must rely on a program to ensure their and their workers compliance with MDO limitations
- If the computer program happened to fail, the effort to manually verify compliance is too time consuming
- Operators are not comfortable relying on a computer program to ensure compliance of a federal law

Consequences PROS has experienced with MDO

- The second,
- Several field operator at a facility were told they would have to cancel overtime to roll onto an outage schedule
- The field operators deliberately took 4 hour blocks of vacation on their regular schedule to lower the MDO work hour average
- They were then able to work additional overtime
- All work hour limitation were observed
- 5 field operators exceeded the 54 hour average after the adjustment, when only one would have violated the average prior to the adjustment

Consequences PROS has experienced with MDO

- The third,
- Shift Manager Meetings have basically stopped or been diluted by only a partial population of SMs
- MDO limitation directly impacts the number of SMs who can attend these meetings
- Without the SM meetings, internal OE (usually the most valuable) is not effectively shared
- In addition, SRO and RO meetings held at some facilities have also stopped

Consequences PROS has experienced with MDO

- And the final consequence,
- Short term watch relief coverage encompasses a larger portion of a supervisors time
- The time frame has increased by as much as a factor of 5
- The complexity of the process has prompted peer checks at many sites which requires more supervisor time
- At one facility two unit supervisors spent over an hour each finding a fatigue-rule compliant replacement when an oncoming Operator called in sick (this used to take one supervisor a maximum of 30 minutes)

In closing

- The Fatigue Rule doesn't make it impossible for present operating staffs to comply, it just makes it very difficult.
- The existing Operating staffs simply have to absorb the new administrative burden

In closing

- PROS members do not feel comfortable relying on a computer program for compliance with a Federal Law
- Further, our members who are supervisors of covered workers feel vulnerable being placed in a position requiring computer software to show compliance for their crew

In closing

- The PROS body of operators feel we have been put into an undesirable environment formed by the complexity and rigidity of the MDO limitations
- Our members feel their has been unnecessary burden placed on the very body of people the rule was intended to protect
- The replacement of the MDO limitation with a work hour weekly average would greatly reduce this burden while still meeting the objective of limiting worker fatigue