

**Sent:** Tuesday, December 03, 2013 9:58 PM

**To:** Consultation

**Subject:** REGDOC-2.2.1, Human Performance: Managing Worker Fatigue and Hours of Work

As a utility employee I would like to suggest some clarifications to be added to this document to ensure management understands the full intent of the document, and there is no wiggle room or vagueness to allow management or human resources “interpretation” of the guidelines.

For example, under the current Limits to Hours of Work Procedure the term 12 Shift Worker is interpreted by management and human resources to mean only plant personnel who work A to E crews, not a 12 hour S,T or U crew (dayshift) who for business needs has been short shift changed to work 3 or more night shifts. Management and human resources currently is making staff return to work with only 24 hours off following 3 or more night shifts under these circumstances stating that the limits only apply to shift workers on an established schedule, not those who are volunteering to work 3 or more night shifts in support of emergent work.

Per **3.2 Limits on hours of work and recovery periods 1 and 2**, the document implies Fuel Handling systems are a safety related system, by specifically naming Fuel Handling operators in 1. 2 then identifies personnel who perform maintenance on safety related systems. However, when you get to the definitions in the glossary there is no mention of Fuel Handling systems. I believe that this is a loophole that can be exploited to apply the rules to Fuel Handling Operators and at the same time deny Fuel Handling Maintenance staff the required rest periods. Please include a specific reference to Fuel Handling Systems in the glossary and Fuel Handling Maintenance staff in 3.2 2.