

AFPM/API Fatigue Risk Management Workshop – September 20, 2012

Facilitated discussion:

1. Fatigue policy application:
 - a. “The guidelines are intended for all employees and on-site contractors (commuting to/from the facility daily and) working night shifts, rotating shifts, extended hours/days, or call outs **involved in process safety sensitive actions** as well as those making **process safety sensitive decisions.**” - API RP 755
 - b. Will the following functions be covered by your company’s FRMS?
 - i. Process division employees (Operations)
 - ii. Process division front-line supervisors and middle managers
 - iii. Process division manager(s)
 - iv. Maintenance craftsmen and laborers
 - v. Maintenance supervisors
 - vi. Maintenance manager(s)
 - vii. Engineers/inspectors
 - viii. Administrative personnel (Refinery Manager, Human Resources, Senior Refinery Leadership, Administrative Clerks, etc.)
 - ix. Emergency response teams
 - x. Safety personnel
 - xi. Security
 - xii. Laboratory personnel
 - xiii. Warehouse personnel
 - xiv. Contractors and vendors
 - c. What is your company doing relative to RP 755 Section 4.3 “Staff-Workload Balance”?
 - i. Have you performed or will you perform an initial assessment of staffing levels?
 - ii. What will that assessment entail?
 - iii. How often will you conduct a “periodic” assessment under Section 4.3?
 - d. How often will you perform a “periodic” assessment of your company’s FRMS (described in Section 4.9) and what will that assessment entail?
2. Fatigue policy training:
 - a. What type of training are you providing to:
 - i. Supervisors administering the policy
 - ii. Management employees
 - iii. Affected employees
 - iv. Families of affected employees
 - v. Contractors (if they are included within the FRMS)
 - b. Is the training being provided by CBT or during face to face training classes?
 - c. How will you train line supervisors that may be faced with a fatigued employee? Will there be some type of role play?
 - d. Is training segregated such that there is a section on the management systems versus managing fatigue on a personal basis?
 - e. How often will you refresh on the training?
 - f. Will training be offered to medical professionals that monitor the plant?
 - g. Will the training be administered mainly in-house or by a third party?

3. Turnaround/Outage issues:
 - a. With regard to outages, have you already identified allowable exceptions for working beyond the consecutive day or hours limitations?
 - b. Are all positions in a turnaround/outage treated the same from a fatigue perspective? Do you differentiate between planners or welders or inspectors or instrument technicians? Will ALL contractors be required to follow the 14-day rule?
 - c. What assurances can the contractor companies provide to assure owners that contract employees are not somewhere else on their required days off?
 - d. Which owner company department will oversee the FRMS? Will specific FRMS tasks be delegated to various departments? For example, will contractor fatigue management be delegated to a Project Manager?
 - e. How are you defining an outage, particularly in situations that directly impact only a portion of the facility?
 - f. Who is responsible for declaring an outage (with respect to the FRMS)?

4. Contractor issues:
 - a. How are: 1) nested (in-house) contractors; and 2) turnaround/outage contractors handled under your FRMS?
 - i. Will your company specify that the contractor(s) will follow your site's FRMS rules (as is often done for lock out/tag out procedures) and actively enforce those rules or will you require contractors to have a similar (or better) FRMS and police themselves?
 - ii. How will you ensure that contractors are conforming to the FRMS (yours or theirs)? Will the owner company track and monitor contractor fatigue data or will the contractor track, monitor and report fatigue data to the owner?
 - iii. Aside from banning the contract employee from the worksite, what consequences is your company planning to impose on employees who violate the standard by working too many days/hours?
 - b. Do you differentiate between large and small contractors? If so, how?
 - c. How are FRMS exceptions for contract employees handled?

5. Managing exceptions:
 - a. What level of approval is required in your corporate or site policy for an exception to the specified hours of service limits in API 755?
 - b. In your corporate or site policy, who is responsible for recognizing the need for an exception to the specified hours of service limits in API 755?
 - c. What is your anticipated or actual target level for an acceptable number of exceptions per month to the specified hours of service limits in API 755?

6. Software/IT tools:
 - a. Who will handle data entry and who will back up that individual?
 - b. Will there be a deadline for schedule changes/submissions before determining eligibility/ineligibility to work or will the system flag ineligibility in real time?
 - c. Who can authorize a data change after the deadline for submitting scheduled work hours?
 - d. Who can authorize an override to the system for exceptions?
 - e. How do you rank the priorities for system selection/implementation: cost, functionality, ease of use, and integration with other systems?

7. Union issues:
 - a. What has been your company's experience bargaining with a facility's union(s)? Which issues have been non-issues and which have been difficult to resolve?
 - b. Do you canvass for daily overtime by seniority or hours or by other criteria?
 - c. If you are unable to bargain changes to contract language that permit the restriction of overtime per the Hours of Service Limits, how will you deal with the Hours of Service Limits for these bargaining unit employees?
 - d. Are you implementing the Hours of Service Limits and related overtime distribution issues at all of your plants at the same time (represented and non-represented)?
 - e. Will you involve your unions in the setting of improvement targets for key metrics per API 755?
 - f. Will you involve your unions in the "exception process" along with the impacted employee's supervisor and one other management representative?