



# Fatigue Management

Entergy system policy

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## Our values

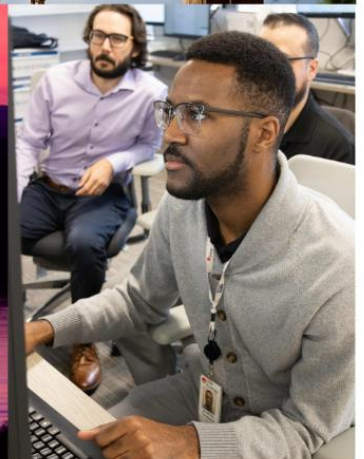
safety

teamwork

always learning

integrity

respect



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# Why do we need this policy?

## 1.1 What is the purpose of the Fatigue Management policy?

This Policy, applied in conjunction with existing safety policies, procedures, and standards, sets forth the Company's expectations for managing risk associated with Fatigue. Where discrepancies or conflicts may exist between this Policy and other policies or procedures within a business unit, the Company's foremost considerations is the safety and wellbeing of employees, the general public, and impact on the community at large. The business unit's executive leader shall ensure any such conflicts are appropriately resolved.

## 1.2 What are our responsibilities?

- **1.2.1 Manager, Enterprise Safety** – is responsible for the maintenance and interpretation of this Policy.
- **1.2.2 Vice President, Safety** – are responsible for approving any deviations from this Policy.
- **1.2.3 Enterprise Safety employees** – are responsible for oversight of this Policy and providing support to review business unit compliance with this Policy.
- **1.2.4 Business Unit Safety personnel** – are responsible for providing Policy guidance and support.
- **1.2.5 All Entergy employees** – are responsible for immediately reporting:
  - Known, suspected or the potential of fatigue to their Supervisor; and
  - Known, suspected or potential violations of this Policy by following the procedures described in the Reporting Violations Policy.
- **1.2.6 All Supervisors and/or Management Personnel** – are responsible for ensuring Employee Fatigue is managed in accordance with this Policy. Supervisor could be an employee's direct supervisor or others which they may be assigned to for project or storm work. Supervisors shall:
  - Evaluate environmental factors, job tasks, physical conditions of employees and duration of planned or emergent work in relation to Fatigue risk factors.
  - Take appropriate actions to minimize and eliminate Conditions Adverse to Safety or Operations because of potential worker Fatigue.
  - Be familiar with Entergy's current Fatigue assessment guidance and employ the guidance in evaluating workers. (See Attachment I, Example of a Fatigue Identification and Assessment Checklist.)
- **1.2.7 Business Unit VP or designee** – is responsible for:



- Integrating the requirements of this Policy into business operations and strategic planning.
- Implementing Fatigue management practices in the business to identify and mitigate Fatigue risks in the workplace.
- Determining if any additional approvals or forms are required for an employee's business function(s) in addition to requirements in this Policy.
- Recommending to the Vice President Operational Excellence, the approval of any exceptions from this Policy for any Employees within a business function(s).

## What do we need to know?

### 2.1 General Requirements

The following sections describe general requirements intended to control risks involved with managing potential Fatigue for employees.

- **2.1.1** Fatigue Management requirements for contracted support is outlined in ESP-06 which does meet or exceed the requirements of this Policy.

### 2.2 Fatigue Program Development

Functions, businesses, and departments shall establish programs to monitor and evaluate worker Fatigue along with the needed controls to assess Fatigue management performance.

### 2.3 Employee Fatigue Reporting

Employees are expected to report to work rested and ready for duty and report promptly to supervisors if they are feeling Fatigue. If the employee is below the maximum threshold for cumulative hours, then the Supervisor should consider additional breaks/ rest for the employee to recover before proceeding with work.

### 2.4 Limitation of Cumulative Work Hours

- **2.4.1** Advanced planning is recommended to minimize Fatigue-related risks when exceeding fourteen (14) consecutive hours of work. Management shall evaluate potential Fatigue impacts on employee safety and critical activities when employees exceed fourteen (14) consecutive hours of work and execute prudent actions per [Section 3.5](#) Fatigue Mitigation of this Policy.
- **2.4.2** Whenever an employee works sixteen (16) consecutive hours or accumulates sixteen (16) hours in a 24-hour period, the employee shall be required to observe eight (8) hours of rest time off and be required to be off duty for this duration for each 16-hour duration. Accumulated hours do not reset at midnight and the 16-hour accumulation is based off any rolling 24-hour period.



- **2.4.3** Only by exception and Management Approval may an employee work beyond sixteen (16) consecutive hours or accumulate more than sixteen (16) hours in a 24-hour period. See [Section 3.3](#) of this Policy, Approval of Exceptions for Cumulative Work Hours.

## 2.5 Limitation of Consecutive Workdays

- **2.5.1** Scheduling employee work shall include at least one (1) scheduled day off after fourteen (14) consecutive calendar days worked, unless working under an exception to the maximum allowed nineteen (19) consecutive calendar days. Pay for a day off due to limitation of consecutive workdays shall be in accordance with existing business unit practices.
- **2.5.2** Only by exception and Management Approval may an employee work beyond fourteen (14) consecutive calendar days. See [Section 3.4](#) of this Policy, Approval of Exceptions for Consecutive Workdays.

# Procedures

## 3.1 Fatigue Management Practices

Callout, reassignment, mandatory rest periods, and rescheduling shall be utilized as initial and primary methods for Fatigue management considerations prior to requesting approvals for exceptions listed in this Policy.

## 3.2 Fatigue Management Exceptions and Approvals

- **3.2.1** Only under Conditions Adverse to Safety or Operations and with Management Approval shall an employee be authorized to:
  - Work in excess of sixteen (16) consecutive hours, or work in excess of sixteen (16) hours within a 24-hour period. When exceeding sixteen (16) consecutive hours of work, additional work oversight shall be utilized as outlined in Policy [Section 3.5](#), Fatigue Mitigation of this Policy
  - Work more than fourteen (14) consecutive calendar days without one (1) calendar day (an entire period of 24 hours) off.
- **3.2.2** The maximum exception for consecutive Workdays allowed to work is nineteen (19) calendar days, once the maximum exception is met, employee shall be granted one (1) calendar day off (an entire period of 24 hours). Pay for a day off due to limitation of consecutive workdays shall be in accordance with existing business unit practices
- **3.2.3** Supervisors shall consider Fatigue and employee safety when scheduling tasks during off normal hours and apply [Section 3.5](#) Fatigue Mitigation of this Policy.
- **3.2.4** In all situations, impact on employee safety shall take priority over productivity.



- **3.2.5** The responsible VP of an employee or group shall be notified on a weekly basis of approved exceptions.

### **3.3 Approval of Exceptions for Cumulative Work Hours**

Cumulative work-hour exceptions are subject to Management Approval as determined by the business unit, and the reasons for an exception may include, but are not limited to immediate actions to prevent serious injury or restore critical services.

- **3.3.1** Management is responsible for prudent and conservative judgment on impact from Fatigue or physical capabilities when an employee or group exceeds sixteen (16) consecutive working hours in a 24-hour period. A requesting supervisor shall discuss with each affected employee Fatigue Mitigation, and the employee's ability to safely continue working prior to requesting an employee to continue working.
- **3.3.2** Supervisors shall obtain Management Approval prior to authorizing an employee or group to work beyond sixteen (16) consecutive working hours but shall not exceed a maximum of eighteen (18) hours in a 24-hour period. The authorization shall include documenting Fatigue Mitigation actions taken.

### **3.4 Approval of Exceptions for Consecutive Workdays**

- **3.4.1** Management is responsible for prudent and conservative judgment on impact from Fatigue or physical capabilities when an employee or group Workdays exceeds fourteen (14) consecutive calendar days. A requesting supervisor shall discuss with each affected employee Fatigue Mitigation, and the employee's ability to safely continue working prior to requesting an employee to work past the fourteenth (14th) consecutive calendar day.
- **3.4.2** Supervisors shall obtain next level Management Approval prior to authorizing an employee or group to work beyond fourteen (14) consecutive calendar days and state all Fatigue Mitigation actions and Workdays shall not exceed the maximum of nineteen (19) consecutive calendar days.

### **3.5 Fatigue Mitigation**

Employee Fatigue during work activities shall be mitigated to promote worker safety and effective execution of critical work activities. Supervisors and/or Management Personnel shall conduct an evaluation of workers Fatigue after the fourteenth (14th) hour of work until the work ends. To aid in successful execution of Fatigue Mitigation, the minimum expectations are as follows:

- **3.5.1** Business unit shall develop a process to help supervisors identify Fatigue through assessment. An example of such assessment can be found in the attachment section of this Policy (Attachment I). Checks and proactive mitigation actions include, but are not limited to the following:
  - Including Fatigue into current job briefing or job hazard analysis.



- Using technology (such as mobile apps) to aid in managing Fatigue.
- Incorporating Fatigue Assessments into existing safety processes.
- Developing control measures that account for the mental, physical, and emotional demands of work to be performed.

## 3.6 Work Hour Monitoring

Recording and tracking of hours and days worked shall be performed and reported to Functional Officers or delegates at least monthly.

- **3.6.1** Business units shall track employee overtime and consecutive days worked and establish programs to manage employee Fatigue per this Policy.
- **3.6.2** Employee schedules and hours tracking shall be used to identify Fatigue risk factors and intervention. Recommended monitoring requirements are as follows:
  - Number of instances an employee accumulated sixteen (16) working hours in a 24-hour period.
  - Number of instances an employee accumulated greater than sixteen (16) working hours in a 24-hour period.
  - Number of instances an employee worked greater than fourteen (14) consecutive calendar days without one (1) day off.
  - Confirmation that no employee Workdays exceed more than nineteen (19) consecutive calendar days.
  - Average percentage of overtime per employee. (Percentage of employee total time)

## 3.7 Training

Fatigue Management training for leaders and employees shall be implemented by the Business Units. The training shall include at a minimum; overview of this Policy, key Fatigue stressors, impact of Fatigue on safety, Fatigue Mitigation, Fatigue hazard reporting, understanding sleep, and Fatigue risk controls. Training shall occur on a three-year frequency and/or upon any significant changes to the scope of this policy.

## 3.8 Adherence to Policy Requirements

Enterprise Safety shall conduct periodic audits and reviews of business function Fatigue Management program processes to promote compliance with this Policy.



## Contact the Entergy Ethics Line

All Employees, agents and contractors of Entergy shall immediately report known, suspected, or potential violations of this policy by following the procedures described in the Reporting Violations Policy. That includes reporting the matter to the online Entergy Ethics Line or by calling **1-888-257-ETHIC (3844)**.



If you are unsure of whether to contact the Ethics Line, use the [Should I call the Ethics Line decision tool](#) to guide you in finding the best company resources to discuss and report issues.

## Helpful information

### Terms to know

- **Callout** – Business unit process intended to summon someone designated as being on call or needed to respond to Conditions Adverse to Safety or Operations.
- **Conditions Adverse to Safety or Operations** – An emergency or critical situation or condition, as determined by a business unit Vice President or higher, which may be eligible for an exception of work hour and Workday control limits, such as:
  - Public or personnel health or safety matters.
  - External events (e.g., weather, fire, flooding).
  - Mitigation or prevention of customer disruption.
  - Regulatory compliance, security threats or risks.
  - Bulk Electric System threats or, risks, or MISO red alerts.
  - An activation of the System, State or BU Incident Command.
- **Entergy, Entergy System Company, or Company** – Entergy Corporation and all its regulated and non-regulated subsidiaries and affiliates in which Entergy Corporation has a direct or indirect majority ownership interest, excluding Entergy Nuclear.
- **Fatigue** – Impaired cognitive and/or physical functioning that may result in an elevated risk of error or accident.
- **Fatigue Mitigation** – Strategies to reduce the likelihood or consequence of an incident when employees are required to work through periods of Fatigue.
- **Functional Officer** – An Entergy System Company Employee with the rank of Vice President or higher in ML 1 - 4.
- **Management Approval** – Approval by an Entergy System Company Employee with the position of Sr. Manager or higher responsible for approving and reporting exceptions to this Policy.





- **Policy** – This Fatigue Management Policy.
- **Workday** – Any day worked which equals or exceeds eight hours in a twenty-four (24) hour period, which could influence Company outcomes or has the potential to impact Entergy’s key stakeholders. This includes, but is not limited to supervising, or performing physical labor or executing tasks impactful to business unit performance.

## Other useful documents

- Environmental, Occupational Health & Safety (EHS) System Policy
- Contractor Safety Management Procedure (ESP-06)

## Need more information?

If you have questions related to this Policy, please contact the policy subject matter expert, your manager, the Ethics and Compliance department ([ethics@entergy.com](mailto:ethics@entergy.com)) or a representative from the legal department.

To see the revision details of prior versions of this Policy, view the [System Policy Revision Log](#). For prior versions of the Policy, contact the ethics and compliance department ([ethics@entergy.com](mailto:ethics@entergy.com)).

## Attachments

### Attachment I: Example Fatigue Identification and Assessment Checklist

This checklist is designed to assist with the identification and assessment of Fatigue by the worker using self-assessment and/or Management assessment.

Check the appropriate responses:

Physical Signs		Mental Signs		Emotional Signs	
Repeated Yawning	<input type="checkbox"/> Yes <input type="checkbox"/> No	Difficulty concentrating on a task	<input type="checkbox"/> Yes <input type="checkbox"/> No	More quiet than usual	<input type="checkbox"/> Yes <input type="checkbox"/> No
Heavy Eyelids	<input type="checkbox"/> Yes <input type="checkbox"/> No	Lapses in attention	<input type="checkbox"/> Yes <input type="checkbox"/> No	Lacking Energy	<input type="checkbox"/> Yes <input type="checkbox"/> No
Eye-rubbing	<input type="checkbox"/> Yes <input type="checkbox"/> No	Slowed reaction time	<input type="checkbox"/> Yes <input type="checkbox"/> No	Mood changes and/or decreased tolerance	<input type="checkbox"/> Yes <input type="checkbox"/> No
Increased rate of blinking	<input type="checkbox"/> Yes <input type="checkbox"/> No	Accidentally wrong thing (making an error)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Emotional outburst and/or aggressive behavior	<input type="checkbox"/> Yes <input type="checkbox"/> No
Head drooping	<input type="checkbox"/> Yes <input type="checkbox"/> No	Accidentally not doing the right thing (making an omission)	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Short periods of involuntary sleep (micro sleeps)	<input type="checkbox"/> Yes <input type="checkbox"/> No				

Add the number of ‘Yes’ responses and apply to the table below:



Score	Risk	Control Measures	
		Self-assessment conducted by worker	Assessment conducted by Management
1 to 4	Low	Continue to monitor own fatigue level	Reassess worker within 2 hours.
5 to 8	Moderate	Report to Manager/Supervisor to discuss continued work in a fatigued state.	Determine appropriate option for action in conjunction with worker. Reassess worker within 1 hour.
9+	High	Cease work immediately. Report to Supervisor. Do not perform any task which pose high risks to safety.	Ensure worker ceases work immediately. Ensure worker's safe return to place of residence or accommodation.

## Approvals

<b>Title:</b> Fatigue Management	<b>Last revision:</b> 12/16/2024	<b>Revision 0.2</b>
<b>Subject matter expert:</b> Jamie Rottman jrottma@entergy.com	<b>Responsible officer:</b> Peter Norgeot, COO	<b>Approved by:</b> Corporate Compliance Committee

This policy applies to any and all employees of any entergy system company, unless otherwise expressly excluded. However, this policy is not applicable to nuclear business organizations and nuclear business organization employees. Nuclear is subject to regulations for fatigue management.

This policy covers employees who are represented by a union, except that any conflicting terms of employment in a collective bargaining agreement or other agreements reached with the union(s) shall control.

Nothing contained in this policy should be construed to suggest that employees of a particular subsidiary or affiliate of entergy corporation are also employees of entergy corporation or any other affiliate or subsidiary of entergy corporation. Moreover, this policy does not create any employment relationship between any person and any entergy system company, nor does this policy confer any contractual right to any person to become or remain an employee of an entergy system company.