

# Medical Operational Experiences in Region III

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# Key Piece of the Puzzle for Medical Quals

ANS/ANSI 3.4 - 2013

## ANS 3.4

- Licensed Operators are required to meet the standards for medical fitness described in ANS Standard 3.4.
- The Site medical is responsible for evaluating each licensed operator's medical status against this standard.



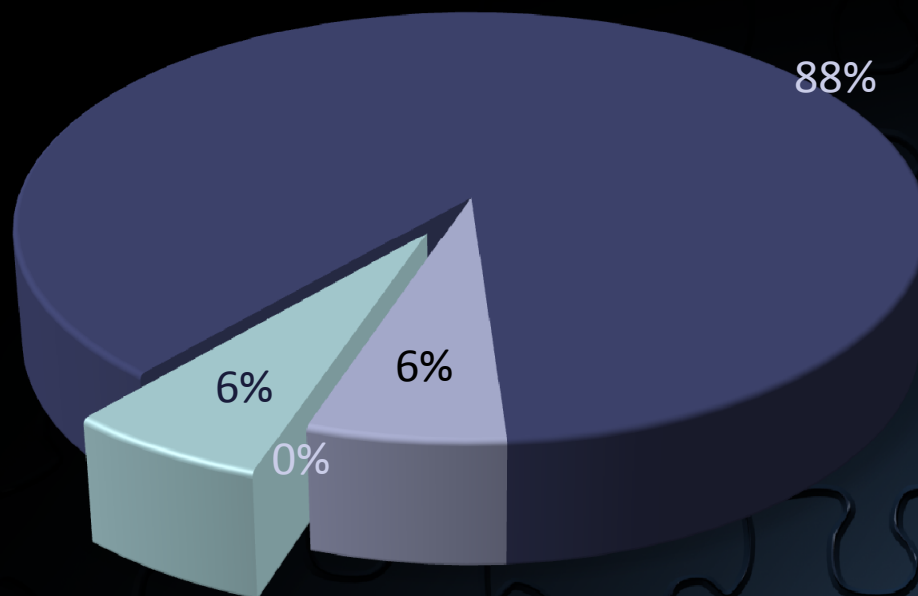


# Region III ANS/ANSI Rev Distribution



## Region III Facility ANS/ANSI Rev

■ 1983 ■ 1996 ■ 1976



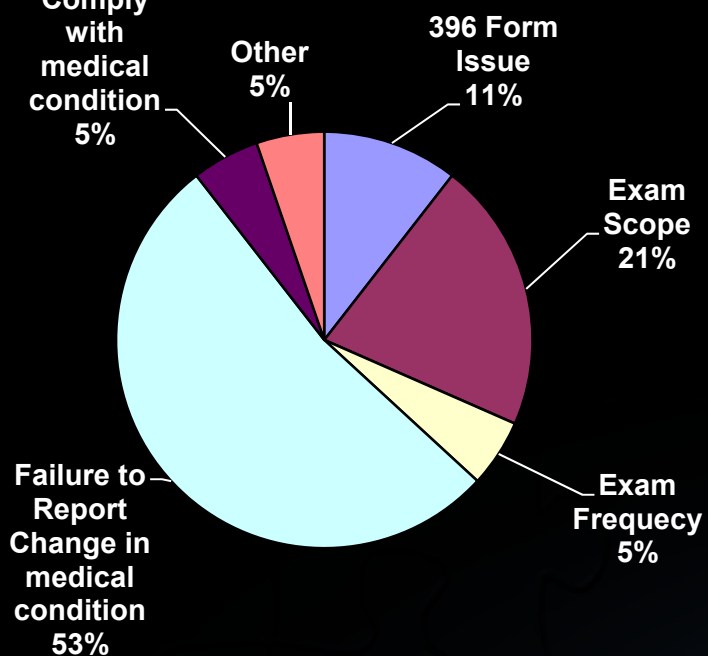
14 Sites are still on the 1983 version

1 site updated to the 1996 version

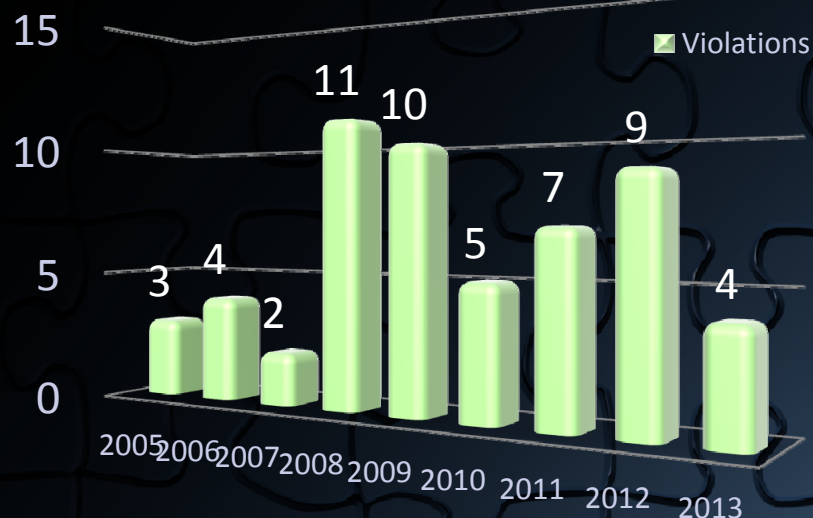
1 site still on the old 1976 version



# The Compliance Dilemma



- Continued Confusion regarding requirements & implementation



# What does it mean to be fit for duty?



- Part 26.5 Definitions has no specific definition of fit for duty
- 26.189 Determination of fitness - regulation states:
  - The process entered when an individual may be in violation of the licensee's FFD policy or is likewise unable to safely and competently perform their duties.
- FFD policy statement is left to the facility licensee to define and enforce. 26.27, Written Policy & Procedures
- Policy statement must be written in detail with clear requirements and consequences for lack of adherence to the licensees policy & procedure



# What does it mean to be fit for duty?

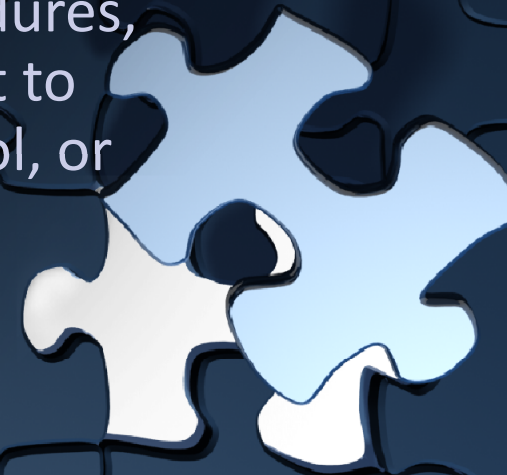
- A state, whether physical, mental and emotional, which enables an individual to perform an assigned task competently and safely.
- Physically and mentally capable of safely performing the essential functions of his/her job with or without reasonable accommodation.
- 55.33(a)(1) The applicants medical condition and general health will not adversely affect the performance of assigned operator job duties or cause operational errors endangering public health and safety.





# What does it mean to be fit for duty?

- In other words, free from any potential effects from any substance or condition that could adversely affect the individual from safely and competently performing their job.
  - No adverse effects from the use of prescribed or over the counter drugs (either legal or illegal)
  - Not under the influence of alcohol
  - Not fatigued
- Facility licensee's Part 26 FFD Policy & Procedures, in general, requires plant personnel to report to work fit for duty unimpaired by drugs, alcohol, or fatigue.





## 55.53 Conditions of licenses

- (j) The licensee shall not consume or ingest alcoholic beverages within the protected area of power reactors, or the controlled access area of non-power reactors. The licensee shall not use, possess, or sell any illegal drugs. The licensee shall not perform activities authorized by a license issued under this part while under the influence of alcohol or any prescription, over-the-counter, or illegal substance that could adversely affect his or her ability to safely and competently perform his or her licensed duties.
- (d) The licensee is subject to, and the licensee shall observe, all applicable rules, regulations, and orders of the Commission.

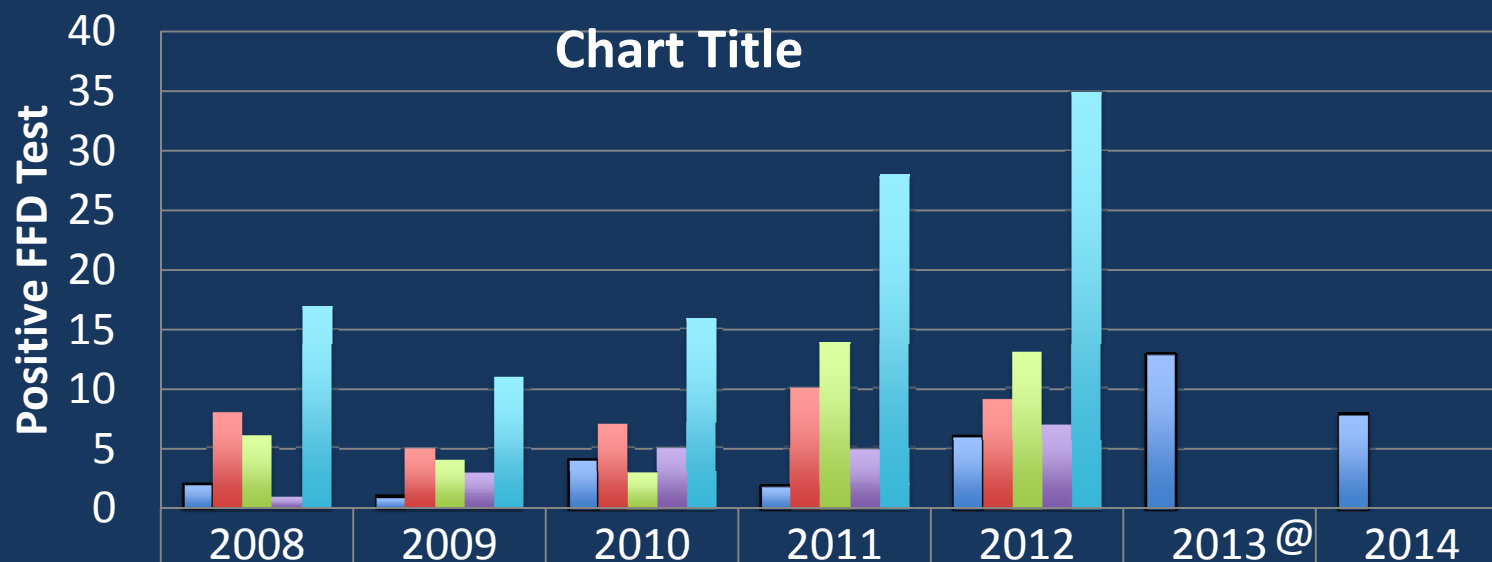


# Part 26 Reportable Events

- 26.719 Reporting requirements
- (b) Significant FFD policy violations or programmatic failures
- Reported via event notification to the HOO, within 24 hrs
- Use, sale, distribution, possession or presence of illegal drugs, or consumption or presence of alcohol within the PA
- Supervisory personnel, FFD program personnel, and 55 licensed operators who are involved in:
  - Use, sale, possession of controlled substance
  - Violated licensee's FFD policy
  - Consumption of alcohol in PA or while performing duties



# Significant Fitness for Duty Events\*



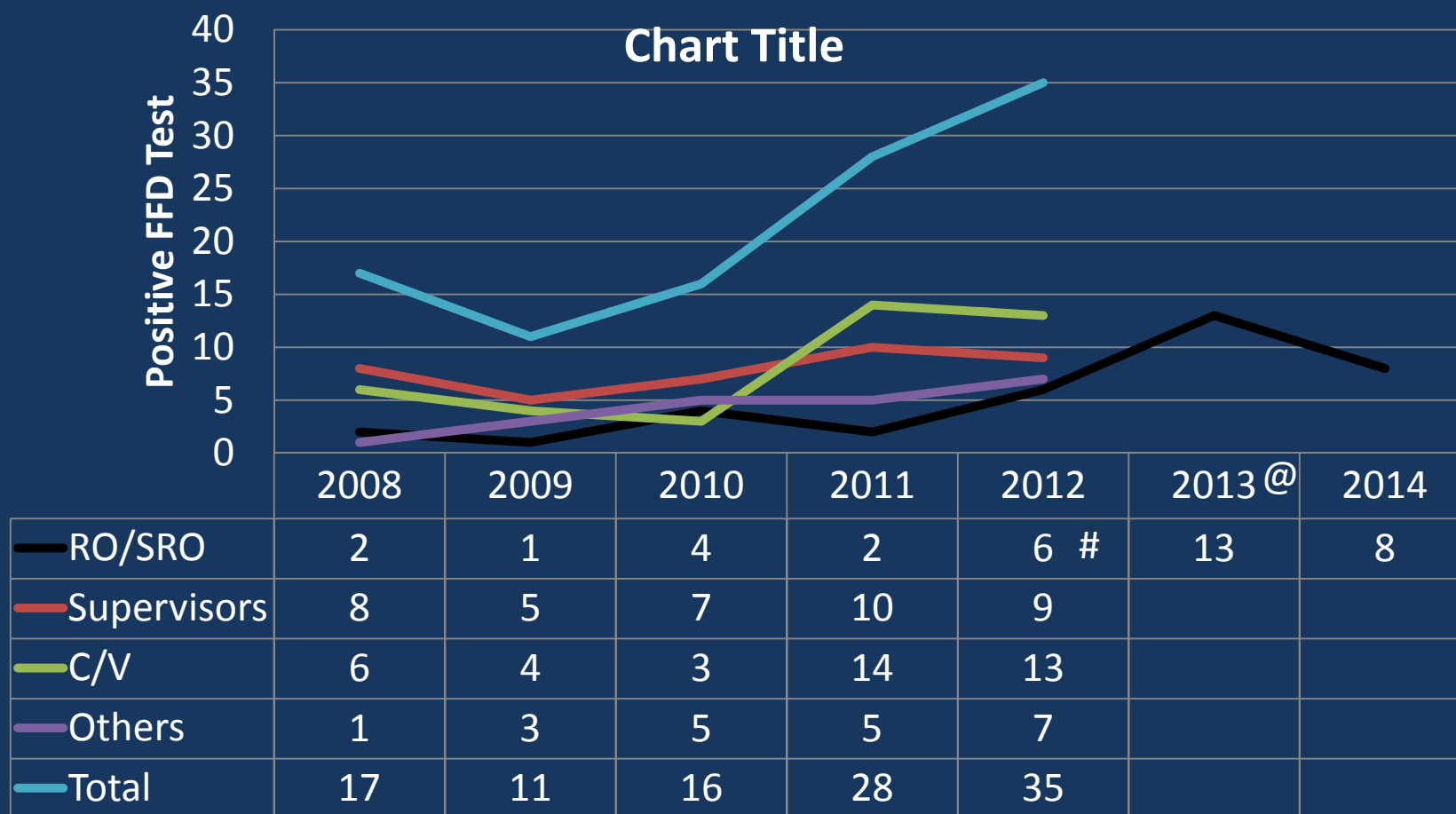
	2008	2009	2010	2011	2012	2013 @	2014
RO/SRO	2	1	4	2	6 #	13	8
Supervisors	8	5	7	10	9		
C/V	6	4	3	14	13		
Others	1	3	5	5	7		
Total	17	11	16	28	35		

\* 24-hour reportable events per 10 CFR 26.719(b)

# only two SL3 violation issued to RO/SRO for positive FFD – on shift

@ NRC FFD program performance report not yet issued

# Significant Fitness for Duty Events\*



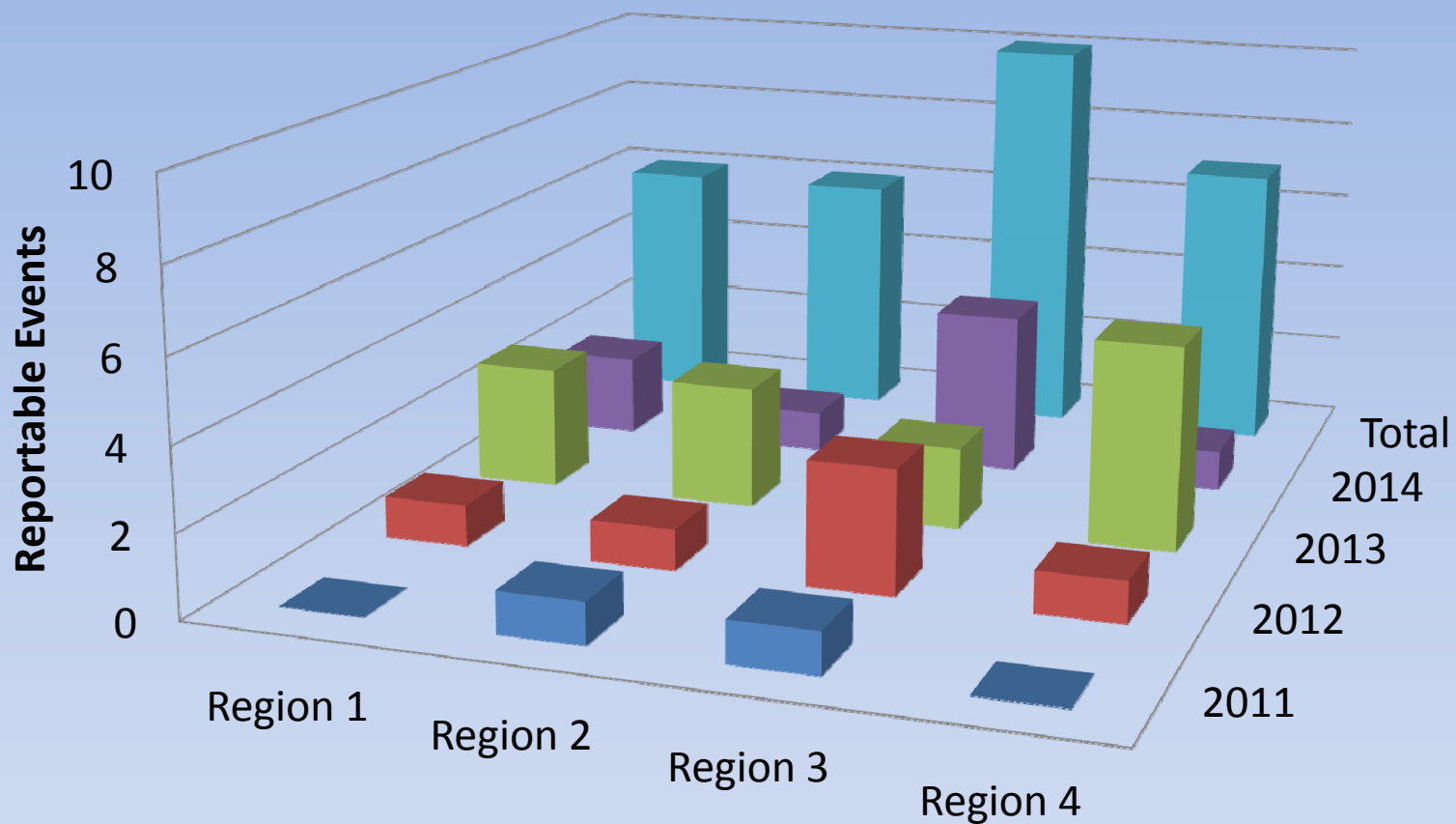
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## Significant FFD Events



	Region 1	Region 2	Region 3	Region 4
2011	0	1	1	0
2012	1	1	3	1
2013	3	3	2	5
2014	2	1	4	1
Total	6	6	10	7

# Recent FFD & Medical Issues



- Palisades SRO, positive for alcohol, not on shift, no violation, only closure letter, diagnosed as NOT dependent on alcohol, retained license
- Quad Cities RO, positive for marijuana, not on shift but illegal drug, individual PEC, SL III NOV, determined NOT to be dependent on drugs, retained employment and license
- Point Beach SRO, positive for alcohol, not on shift, no violation, only closure letter, additional medical condition no-solo restriction, retained license



# Recent FFD & Medical Issues



- Quad Cities SRO ,positive for alcohol, not on shift, no violation, only closure letter, retained license
- Monticello RO, gradual does decrease and subsequently stopped taking his required prescribed medication, informed licensee medical, failed to notify NRC of change in medical condition until 6 months later, SLIV NCV, licensee identified
- Monticello RO, failure to complete biennial medical physical, exceeded two year requirement, SLIV NCV, licensee identified



# Recent FFD & Medical Issues



- D.C. Cook RO, found a can of beer in his lunch box, self reported and turned himself in, security follow up, no medical issues with individual, no enforcement action
- Davis-Besse RO, diagnosed with sleep apnea with no-solo restriction in past, prescribed CPAP and medication not reported to NRC, maintained medical qualification, determined to be minor violation (issues of specific license restriction for the medical condition and what is prescribed meds trial vs permanent)





NRC

Licensee

## Putting the Pieces Together for Licensed Operator Medical Qualification

Working together to assure medical fitness of licensed operators.

Safeguarding the health and safety of the public and the environment.

