

PUBLIC SUBMISSION

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Fitness-for-Duty Drug Testing Program Requirements

Comment On: NRC-2009-0225-0009

Fitness for Duty Drug Testing Requirements; Request for Comment on Proposed Rule and Draft Regulatory Guide

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Submitter Information

Name: Johnny Rogers

Address:

931 Brynwood Drive

Chattanooga, TN, 37415

Email: johnn151@yahoo.com

General Comment

The current rule stipulates in 26.31 that follow up testing shall be implemented as part of a follow-up plan to verify an individual's continued abstinence from substance abuse. This has worked well over the years with the standard five NIDA panel. However, increasing over the past ten years individuals are being placed into the follow up program as a result of the opioid epidemic. A select few of the nuclear facilities have expanded their panels to address the opioid crisis. These expanded panel facilities place individuals into the follow up program for the purpose of monitoring abstinence from opiate addiction. However, when the individual in the follow up program travels to another utility; they are not monitored for the substance for which they were placed in the follow up program; as these programs have not expanded the panel and have no provision to test for the abused opiate. As a result, the industry is currently ill equipped to monitor a national epidemic problem, and as a result, represents a significant gap in the follow up program's ability to detect on going opiate abuse.

Recommendation: Include language that addresses the opiate epidemic and includes provisions for collection and testing under every FFD test condition, including follow up. Provide for mandates to ensure personnel who are placed in the follow up program for a specific substance are monitored for the substance that necessitated their placement in the follow up program regardless of where they are in the industry.