

From: [Adams, Dolores E.\(Exelon Nuclear\)](#)
To: [Zaleski, Brian](#)
Subject: [External_Sender] RE: Part 26 Proposed Rule - Public Meeting on November 7, 2019
Date: Friday, November 08, 2019 2:47:10 PM

Hi Brian,

The proposed rule would revise and add requirements to permit a member of the FFD program personnel to observe a donor during the hydration process. This change would permit the initial collector to perform other activities (e.g., other collections).

I would like to propose that an individual who meets the qualifications for Fitness For Duty Authorization be an acceptable individual for the hydration monitor process. Many times, the shifts that perform chemical testing after hours and on weekends will not have a FFD program personnel to observe a donor during the hydration process. The main difference between FFD program personnel and FFD Authorization initial qualifications is the psychological test. Also, FFD Authorization personnel are in a random pool and must complete annual FFD/BOP training. The psychological test is the only element that FFD Authorization individuals do not get unless they have UAA or UA which most of them do.

Have a nice weekend and thank you,
Dolly



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