

**From:** [Josephchemistry](#)  
**To:** [Schneider, Stewart](#)  
**Subject:** [External\_Sender] quantification of urine dilution (10 CFR 26)  
**Date:** Monday, December 02, 2019 10:11:20 PM

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Dear NRC,

In response to the proposed change to 10 CFR 26:

How is urine dilution being quantitatively determined? I am hoping quantitative specifications for determining dilution are listed somewhere else in 10 CFR.

Without quantifying what constitutes a dilute sample, specific individuals could be selectively chosen to meet a more stringent standard than their colleagues by a prejudiced Medical Review Officer. On the surface, this may not be a significant issue, but given the recent legalization of hemp by the 2018 Farm Bill Act, the potential for inadvertent ingestion minor amounts of THC containing foodstuffs exists. Under normal conditions, this would not trigger a positive drug test screening, but without quantitative requirements to determine urine dilution a prejudiced MRO may attempt to abuse their position. Furthermore, there's institutional pressures to "catch" drug offenders (particularly for employees are in disfavor with their supervisors), which could influence the determination if urine samples are considered dilute.

Sincerely,  
Joseph

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