

Nebraska Public Power District

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July 5, 1990

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Fitness for Duty Testing

Reference: Letter from G. A. Trevors (NPPD) to U.S. Nuclear Regulatory
Commission dated January 3, 1990, "10 CFR 26, Fitness for Duty
Programs"

Gentlemen:

INTRODUCTION

The Nebraska Public Power District (District) herewith notifies the Nuclear Regulatory Commission that the District's fitness-for-duty (FFD) program currently includes drug screening for three additional drugs over and above the minimum panel of drugs required by 10 CFR 26. These three drugs and their respective testing cutoff levels are listed below.

<u>DRUG</u>	<u>INITIAL SCREEN</u>	<u>CUTOFF LEVEL</u>	<u>CONFIRMATORY</u>
Benzodiazepine	300 ng/ml		200 ng/ml
Barbiturates	300 ng/ml		200 ng/ml
Propoxyphene	300 ng/ml		200 ng/ml

BACKGROUND

10 CFR 26.73(d) required that licensees: 1) certify, by January 3, 1990, that they had implemented a Fitness-for-Duty program that meets the requirements of the final rule, and 2) describe any testing cut-off levels more stringent than the minimum requirements imposed by the final rule.

By letter dated January 3, 1990 (Reference), the District certified that it had implemented a FFD program which meets the requirements of the final rule. The District also indicated that it had not implemented any testing cut-off levels more stringent than those imposed by the final rule.

DISCUSSION

Although the District has not imposed more stringent cut-off levels for the minimum panel of drugs identified in the final rule, a reexamination of the District's FFD program has identified three additional drugs included in its

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testing program not listed in the minimum panel of drugs described in 10 CFR 26, Appendix A. The three additional drugs are listed above, and have been included in the District's drug testing program since its inception, prior to January 3, 1990.

10 CFR 26.24(b) states that licensees must at a minimum, conform to the standards described in Appendix A to the rule. This section states further that licensees may, at their discretion impose more stringent requirements than those described in the rule. These include more stringent cut-off levels and/or a broader panel of drugs. 10 CFR 26.24(c) states that licensees may test for additional substances and establish appropriate cut-off levels. Additionally, 10 CFR 26, Appendix A states:

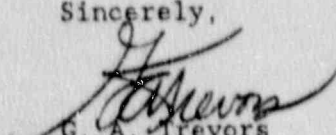
"Licensees may set more stringent cut-off levels than specified herein or test for substances other than specified herein and shall inform the Commission of such deviation within 60 days of implementing such change."

CONCLUSION

The District did not inform the NRC of the additional drugs included in the District's FFD program drug panel within 60 days of January 3, 1990. Accordingly, the District hereby formally notifies the NRC that it includes the three above-listed drugs in its FFD testing program and tests at the cut-off levels indicated. The District will continue testing for these three drugs at the indicated cutoff levels as part of its FFD program unless requested by the NRC to deviate from this course.

Please call if you have any questions.

Sincerely,


G. A. Trevors
Senior Staff Advisor
Nuclear Power Group

GAT/mjb:jw

cc: NRC Regional Office
Region IV
Arlington, TX

NRC Resident Office
Cooper Nuclear Station