

SYSTEM COUNCIL U-3
INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS

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OFFICE OF SECRETARY
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BRANCH

DOCKET NUMBER
PROPOSED RULE **PR 26**

(59FR 24373)

July 12, 1994

Dear Sir/Madam

System Council U3, IBEW, represents approximately 500 union members employed at the Oyster Creek Nuclear Generating Station on the JCP&L/GPU property in New Jersey. We are submitting our comments with regard to the notice in the May 11, 1994 Federal Register pertaining to 10CFR 26, Fitness for Duty program.

We at System Council U3, IBEW, continue to believe strongly that random testing of workers is an invasion of privacy and the NRC (Nuclear Regulatory Commission) should not compel personnel, with unescorted access to the protected area, to submit to random drug and alcohol testing within the confines of 10CFR26. We presently have numerous other screening requirements which GPU Nuclear uses for the selection of employees which is an acceptable process by which workers can be denied access to the plant should there be any possibility of risk involved.

System Council U3 urges the NRC to revise the scope of 10CFR26 to limit random drug and alcohol testing to only those workers who have unescorted access to vital areas at a nuclear power plant (option 3). We would continue to utilize other FFD programs for the "non-vital" access personnel. The random testing is not cost effective to Oyster Creek nor is it supportive to the moral of the dedicated union workers that are employed at Oyster Creek.

We firmly believe that Option 3 would not increase the risk of sabotage or vandalism. Psychologic screening and other Fitness For Duty controls which are being utilized for access to vital and protected areas are more than sufficient and have already proven to be trustworthy.

System Council U3 concurs with the IBEW recommendation that a joint committee of regulators (NRC), licensees (management) and workers (union) work toward developing

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the safest work environment possible and still take into consideration employer cost,
employee privacy and working conditions.

Sincerely,



W. D. Wardell, Jr.
President

WDW/c

cc: J. J. Barry
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