



AFL-CIO



SYSTEM COUNCIL U-4---IBEW

REPRESENTING LOCAL UNIONS: 359, 622, 627, 641, 759, 820, 1042, 1066, 1191, 1263, 1908

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DOCKET NUMBER
PROPOSED RULE **PR 26**
(59FR 24373)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

August 1, 1994

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Docketing and Service Branch

Reference: 10 CFR Part 26
Change Consideration of the Fitness
For Duty Requirements

Dear Sir/Madam:

The System Council U-4, IBEW is a body of 4,000 Brothers and Sisters working for the Florida Power and Light Company. We represent approximately 1,000 members in the Nuclear Industry at St. Lucie and Turkey Point Nuclear Plants. We have a keen interest in the notice on Fitness For Duty Program, 10CFR 26 of May 11, 1994.

The System Council U-4, IBEW does not support random drug testing. It adds cost to the employers of our industry, (approximately \$18.00 per test, not counting lost time and productivity to have each employee tested) and has not been proven to be a viable deterrent for drug or alcohol use not a cost effective detection method to remove impaired personnel from the work place.

The present system of random testing all who have unescorted access to the protected area, incurs high cost to our Company not only for the base cost of each test, but in the man hours of lost productivity at our facilities of our employees from clerical and administration to the janitor and food service who are required to be subjected to testing. This system is humbling to the employees who must provide their body fluid for test. This cost to the consumer coupled with the embarrassment to the employee, must be considered when developing guidelines.

The nuclear plant can be adversely affected should a driver of any vehicle have an accident with the transmission line pole exiting or entering our facility should we test all drivers. Another question is, who should administer such a program or shoulder the burden of cost?

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The most reasonable and cost effective measure would be Option 3, testing those who have the unescorted access to the vital areas which would be a non-burdensome transition from the present system of the protected area.


We see no increased risk to the plant from any act inadvertent or deliberate. Those areas of greatest concern will be covered as they presently are and everyone with plant unescorted access, are still subjected to initial screening by our employer and they are also subject to complete background checks the vulnerable of the plant will be unchanged.

We have not seen any facts indicating drug abuse has led to anyone deliberately sabotaging any facility. It is obvious those who follow accounts of sabotage that greed, philosophy, and anger due to real or perceived injury influence most deliberate acts. Our employer carefully screens those who have access to safeguard from personalities who may exhibit such traits. The security of the plant is the largest deterrent to the introduction of illegal substances to the plant. The fitness for duty program has little to no effect on this matter.

Many new means of detecting true impairment are arriving on the testing scene. One that looks promising is the computer dexterity testing which uses a base line and history to accurately detect true impairment legal or illegal. With these dexterity evaluations, one does not detect poppy seeds nor Actified but impairment which is the intent of drug testing. These test are also less intrusive and do not have the stigma associated with drug testing. The hair tests for drug use are also historical in nature and do not tell you what impairment an individual may have at the time of the test.

I trust the Commission will evaluate the true cause and effect of testing and realize intrusive testing at high cost is not an effective way to deter not detect impairment.

Respectfully



J. F. Schantzen
Business Manager

JFS/ct

cc: J. J. Barry, Pres. IBEW

H. W. Gurley, IVP-Fifth Dist

File: