

DOCKET NUMBER

PROPOSED RULE **PR 26**

(59FR24373)

DOCKETED
USNRC
Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420**FPL**

'94 AUG -9 P2:49

AUG 9 1994OFFICE OF SECRETARY
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L-94-206

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Consideration of Changes to Fitness-For-Duty Requirements.
59 Fed. Reg. 24373 - May 11, 1994
Request for Comments

On May 11, 1994, (59 FR 24373), the Nuclear Regulatory Commission (NRC) published a request for information and comments regarding "Consideration of Changes to Fitness-For-Duty Requirements." Florida Power and Light Company (FPL), as the licensed operator of two nuclear power plant units in Dade County, Florida and two nuclear power plant units in St. Lucie County, Florida, submits the following comments.

The Nuclear Energy Institute (NEI) is offering comments on the request for comments. FPL endorses NEI's comments and recommendations. Additionally, FPL submits the following comments which highlight the NEI letter.

FPL believes the current scope of the random drug testing requirements in 10 CFR 26, which requires that all persons granted unescorted access to protected areas at nuclear power plants be subject to random drug testing, be retained.

FPL believes it is most important to ensure that all persons working at a nuclear power plant are trustworthy and reliable. FPL feels strongly that the NRC should build on the use of existing trustworthiness programs (background investigations, psychological evaluations, drug and alcohol testing, and continual behavior observation programs), to reduce the burdensome vital area control regulation imposed to protect against a potential insider threat. A basic premise supporting changes to the vital area control regulation continues to be that all persons with unescorted access to the protected area will have satisfactorily passed all required trustworthiness checks, including random drug and alcohol testing.

FPL appreciates the opportunity to comment on this issue.

Very truly yours,

W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/spt

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