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AEP:NRC:0508AF

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
PROPOSED RULE CHANGES TO FITNESS FOR DUTY (FFD)
REQUIREMENTS

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

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

Attn: Docketing and Services Branch

August 5, 1994

Dear Mr. Secretary:

Volume 59, No. 90 of the Federal Register includes proposed rule changes to 10CFR Part 26 FFD requirements. The following are our comments regarding the proposed rulemaking and changes to 10CFR Part 26.

We recommend that the present scope of coverage and detail of the random testing requirements be retained. The current program provides consistent requirements for all personnel within the Plant regardless of their job responsibilities. Although cost savings may be realized by removing certain groups of workers from FFD (i.e., based on access to protected or vital areas or position descriptions), the maintenance of the random test pool would become administratively more burdensome. Also, the possibility of inadvertently not including personnel in the pool would increase due to the ever-changing status of personnel. The reduction from 100% to 50% population random test requirement has significantly reduced the cost of the testing program and further reduction may impact upon assuring a drug free work environment.

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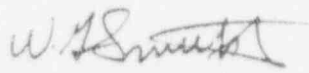
Mr. Secretary

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We further recommend that the present method of testing (i.e., urinalysis) be continued due to worker acceptability as well as the well-documented accuracy of results since the implementation of the FFD rule on January 3, 1990. Although the proposed performance-based testing has a sensitivity to impairment, it would not determine that an individual was impaired due to substance abuse nor would it detect illicit substance abuse if there was no observed impairment.

Sincerely,


for E.E. Fitzpatrick
Vice President

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cc: A. A. Blind - Bridgman
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NRC Resident Inspector - Bridgman
NFEM Section Chief
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