



Public Service

Public Service
Company of Colorado
P.O. Box 840
Denver CO 80201-0840

June 18, 1991
Fort St. Vrain
Unit No. 1
P-91213

A. Clegg Crawford
Vice President
Nuclear Operations

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

ATTN: Mr. Seymour H. Weiss, Director
Non-Power Reactor, Decommissioning and
Environmental Project Directorate

Docket No. 50-267

SUBJECT: Fort St. Vrain Fitness for Duty Program

REFERENCE: 1. NRC Letter, Erickson to Crawford, dated May 21, 1991
(G-91106)

Dear Mr. Weiss:

This letter is to advise the NRC that Public Service Company of Colorado (PSC) is discontinuing its 10 CFR Part 26 Fitness for Duty Program at Fort St. Vrain (FSV), effective August 1, 1991. This action is being taken consistent with the permanent shutdown condition of the plant, as confirmed by our receipt of the FSV possession only license (Reference 1). The requirements of 10 CFR Part 26 are only applicable for a licensee authorized to construct or operate a nuclear power reactor, as defined in 10 CFR 26.2.

PSC is committed to maintaining a safe drug free work environment at Fort St. Vrain. Our Company Fitness for Duty Program, which includes drug and alcohol policies, training provisions, and an Employee Assistance Program, will continue to apply to all PSC employees associated with Fort St. Vrain. In addition, until all nuclear fuel is removed from the reactor building, random drug screening will be applied to selected groups of FSV workers. The selection of these groups is currently under consideration, but it will include individuals with access to FSV fuel, and emergency response personnel. A copy of PSC's Fitness For Duty Policy is attached for your information.

Handwritten: April 11

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If you have any questions regarding the FSV Fitness For Duty Program,
please contact Mr. M. H. Holmes at (303) 480-6960.

Very truly yours,



A. Clegg Crawford
Vice President
Nuclear Operations

ACC/SWC/lmb

cc: Regional Administrator, Region IV

Mr. J. B. Baird
Senior Resident Inspector
Fort St. Vrain

Mr. Robert M. Quillin, Director
Radiation Control Division
Colorado Department of Health

40. FITNESS FOR DUTY (Alcohol and Drugs)

40.0 Policy

Our company has a commitment to its employees, customers, shareholders and the public to provide a safe work environment and to provide energy in a safe, efficient manner. All employees shall report for work and remain in a physical and mental condition that enables them to perform their duties. Involvement with illegal drugs and the use of alcohol or being under the influence of alcohol during work hours will not be tolerated.

40.1 Applicability

This policy is applicable to all employees of Public Service Company of Colorado and its subsidiaries.

40.2 Responsibilities

- A. Management employees are responsible for:
 - 1) Assuring that the employees under their supervision are capable of performing their work assignments in a safe and efficient manner.
 - 2) Identifying personnel who appear to be under the influence of alcohol and/or using non-medically authorized drugs.
- B. Each employee is encouraged to report to management any violation of the Fitness for Duty Policy.

40.3 Drugs

- A. Any employee who uses, possesses, buys, sells, distributes or is under the influence of illegal drugs while on duty, including paid and unpaid meal periods, or while on property owned or leased by the company, is in violation of this policy and is subject to disciplinary action, up to and including discharge.
- B. Any employee testing positive for drugs, pursuant to laboratory testing procedures, is in violation of this policy, will be referred for medical evaluation and is subject to disciplinary action, up to and including discharge.
- C. Employees undergoing medical treatment with a prescribed medication or taking over-the-counter medication which may alter their physical or mental abilities to perform their duties must report this treatment to their supervisor. Employees who abuse over-the-counter or prescribed medication are in violation of this policy and are subject to disciplinary action, up to and including discharge.

40.4 Alcohol

Any employee who uses, or is under the influence of an alcoholic beverage while on duty, including paid and unpaid meal periods, or while on property owned or leased by

the company, is in violation of this policy and is subject to disciplinary action, up to and including discharge.

40.5 Employee Assistance

Employees with an alcohol or drug problem are encouraged to seek help. An Employee Assistance Program (EAP) is provided for employees of the company. The program provides confidential assistance to employees in problem identification, evaluation, counselling and referral services for emotional, behavioral, medical, personal and chemical dependency problems which may be experienced by employees and their families no matter what the cause. By charter, the EAP does **not** enforce the Fitness for Duty Policy. An employee who voluntarily self-refers to the EAP for assistance will not be disciplined for such self-referral or subsequent treatment. However, volunteering to seek EAP assistance or to participate in a treatment program will not prevent disciplinary action if an employee has been instructed to submit to testing procedures or is already under investigation or suspension for a violation of the Fitness for Duty Policy.

40.6 Definitions

40.6.1 Candidate

An applicant for employment (regular, probationary, part-time or temporary) with the company who has been offered a position and is undergoing the pre-employment processing.

40.6.2 Collection Site

A designated place where individuals present themselves for the purpose of providing a specimen of urine, breath or blood to be analyzed for alcohol or drugs.

40.6.3 Collection Site Person

A person who instructs and assists employees at a collection site, and who receives and makes an initial examination of the specimens provided by those employees. A collection site person shall have completed training to carry out this function, or shall be a licensed medical professional or technician who is provided instructions for collection.

40.6.4 Commercial Motor Vehicle

A vehicle used in interstate commerce:

- A. Having a gross weight of 26,001 or more pounds; or
- B. Designed to transport more than 15 passengers, including driver; or
- C. Used in the transportation of hazardous materials in quantity requiring placarding.

40.6.5 Company

Public Service Company of Colorado and its subsidiaries.

40.6.6 Company Property

Property, land and buildings owned or leased for use by the company where employees may be expected to work, and company vehicles or equipment, including vans used for commuting to and from work.

40.6.7 Contractor

Any company or individual performing work or providing an operating, maintenance or emergency response function on a gas pipeline or gas facility that is governed by Department of Transportation (DOT) regulations (49CFR192, 193 or 195) or a company performing work governed by the Nuclear Regulatory Commission (NRC). The contract may be written, a purchase order or a verbal agreement.

40.6.8 DHHS

United States Department of Health and Human Services or any designee of the Secretary, Department of Health and Human Services.

40.6.9 DOT

United States Department of Transportation.

40.6.10 DOT Reportable Accidents

A. Motor Vehicle Accident (49CFR394.3).

An accident which results in death of a human being or bodily injury to a person who, as a result of the injury, immediately receives medical treatment away from the scene of the accident; or total damage to all property aggregating \$4,400 or more based upon actual costs or reliable estimates.

B. Gas Facility Accident (49CFR191).

- 1) An event that involves a release of gas from a pipeline which resulted in a death or personal injury necessitating in-patient hospitalization; or property damage, including the cost of gas lost by the operator or others or both of \$50,000 or more.
- 2) An event that is significant, in the judgement of the operator, even though it did not meet the criteria of B.1) above.

40.6.11 Employee

An individual, who is assigned a specific full-time or part-time position with the company.

40.6.12 Follow-up Screening

A screening conducted at unannounced intervals, to ensure that an employee is maintaining abstinence from the abuse of drugs.

40.6.13 For Cause

A reasonable belief that an employee is using alcohol or drugs or that an employee's performance or behavior is being affected by the use of alcohol or drugs.

40.6.14 Inactive Employment Status

Any employee who is on leave of absence (military, personal, pregnancy, union service), long term disability or termination.

40.6.15 Meal Periods

Pertaining to the use of alcohol, paid and unpaid meal periods do **not** include overtime meals at the end of a work period if the employee eats the meal off company property, is not driving a company vehicle and will not return to duty at the conclusion of the meal.

40.6.16 Medical Review Officer (MRO)

A licensed physician responsible for receiving laboratory results generated by the drug screening program who has knowledge of substance abuse disorders and has appropriate medical training to interpret and evaluate an employee's positive test results together with his or her medical history and any other relevant biomedical information.

40.6.17 NRC

The United States Nuclear Regulatory Commission.

40.6.18 Random Selection Process

A. A selection process that is on a random and unannounced basis. The tests shall be administered so that a person completing a test is immediately eligible for another unannounced test. As a minimum, tests shall be administered on a nominal monthly frequency and at various times during the day. Random tests conducted annually shall equal 50 percent of the total number of employees in the random pool.

B. At Fort St. Vrain, tests shall be administered on a nominal weekly frequency and at various times during the day. Random tests conducted annually shall equal 100 percent of the total number of employees in the random pool.

To Be Revised

40.6.19 Screening

A. The overall process of having the employee or candidate provide a specimen(s), having the specimen(s) analyzed (tested) by a certified laboratory, and notifying the

necessary personnel of the test results. In screening "For Cause", the specimen(s) may be urine, blood, breath or any combination thereof.

- B. Employees on leave of absence, sick leave, long term disability, permanent total disability or temporary total disability under workers' compensation, or those who are released for union activity shall not be required to submit to screening for actions while on such status.

40.6.20 Testing

The analytical process conducted by a DHHS certified laboratory.

40.7 Specific Responsibilities

40.7.1 Auditing Manager

Performs audits of the company and contractor programs to ensure compliance with company policy and governmental regulation.

40.7.2 Contractors

All contractor personnel performing DOT or NRC regulated activities within the scope of this policy are subject to either the company's procedures or to procedures formally reviewed and approved by Public Service Company.

40.7.3 Division Manager

- A. Notifies current DOT regulated contractors, in writing, of their responsibilities to have a drug program in compliance with governmental regulations.
- B. Ensures that all future contracts with DOT regulated contractors include a provision for compliance with governmental regulations.
- C. Except in Denver Metropolitan Area, ensures that all candidates for employment are referred to approved collection site for Fitness for Duty screening.
- D. Ensures that employees transferring to gas department positions covered by DOT regulations have completed screening prior to their first work shift, or that they are already participating in random screening.
- E. Adds and deletes employees from the random drug screening list, as required. The Personnel Action Form (PAF) will be used for this purpose.
- F. Ensures that all new supervisory personnel are scheduled for management alcohol and drug training within three (3) months of their initial supervisory assignment.

40.7.4 Employee

Responsible for conforming to the provisions of this procedure.

40.7.5 Employee Assistance Program Coordinator

- A. Advises employees on rehabilitation programs and the Employee Assistance Program.
- B. Consults with management concerning the Employee Assistance Program.
- C. Conducts employee assessments to determine the level of abuse and treatment.

40.7.6 Employment Director

- A. Ensures that all candidates for employment in the Denver Metropolitan Area are referred to the Medical Department for Fitness for Duty screening.
- B. Ensures that no candidate is hired until successfully passing the Fitness for Duty screening.

40.7.7 Labor Relations Director

- A. Provides, when requested, guidance and counsel to all concerned on matters of discipline.
- B. Reviews all discipline applied under this program for consistency.

40.7.8 Legal Advisor (Kelly, Stansfield and O'Donnell)

Provides legal guidance and counsel to management on matters relating to this program.

40.7.9 Management Employee

- A. Ensures that employees conform to the company's Fitness for Duty Policy.
- B. Provides, when requested, guidance and counsel to all concerned on matters of discipline and the appeals process associated with this procedure.
- C. Initiates the action detailed in these procedures whenever he or she believes that an employee may be unfit for duty.
- D. Initiates the disciplinary process and/or refers the employee to the Employee Assistance Program for assessment.
- E. Ensures employees returning to work from Inactive employment status of ninety (90) calendar days or more complete a drug screen.

40.7.10 Medical Review Officer

- A. Serves as liaison between the company and the testing physicians, collection sites and certified laboratories.
- B. Ensures collection procedures are conducted in accordance with the Department of Health and Human Services (DHHS) Guidelines for Federal Drug Testing Programs.
- C. Ensures that specimens are tested by a DHHS certified laboratory.

- D. Determines that employees who have completed a rehabilitation program are medically fit to return to duty.
- E. Serves as liaison between the company and candidates for employment whose screening examinations are positive.
- F. Provides the Safety and Security Director with:
 - 1) The names of those employees requiring follow-up screening.
 - 2) Statistical reports on a monthly basis.

40.7.11 Payroll/Human Resource Information Center Director

- A. Develops and maintains a computer program which will select identified employees on a random basis for screening.
- B. Provides to the Safety and Security Director, each month, a list of employees selected for random screening.

40.7.12 Safety and Security Director

- A. Functions as the administrator for the Fitness for Duty Program and is responsible to oversee and evaluate its operation.
- B. Schedules designated employees for random screening.
- C. Schedules employees for follow-up screening as identified in paragraph 40.12.10.

40.7.13 Training and Development Director

- A. Gives management personnel training in alcohol and drug awareness and behavioral observation techniques.
- B. Provides employee orientation of the Fitness for Duty Policy and Procedure.
- C. Places in each employee's file record of training.

40.8 Pre-Employment Screening Procedure

40.8.1 Summary

This is the company's procedure for determining the fitness for duty of candidates for company employment.

- A. Pre-employment screening for drugs shall be conducted on all candidates prior to employment.
- B. Any employee who is on inactive employment status for 90 days or more will be re-screened for drugs before being allowed to return as an employee.

40.8.2 Procedures

- A. Pre-employment screening - Denver Metro Area.

1) Collection.

a) Employment Director:

Sets appointment with Medical Department for candidate's physical.

b) Candidate:

- i. Logs in at the Medical Department and presents photo identification to receptionist and nurse. If candidate has no photo identification, he or she will not be allowed to complete the screening process.
- ii. Completes and signs urine custody and control form in presence of collection site personnel.
- iii. Completes screening examination under direction of nurse in conformance with Medical Department collection protocol.

c) Laboratory:

Performs analysis, sends written results to Medical Review Officer.

2) Test Results Negative.

a) A test result **less than** the cutoff levels identified in paragraph 40.12.6.B. shall be reported as negative.

b) Medical Review Officer:

- i. Telephones Employment Director giving candidate's name and social security number. Assuming all other physical qualifications are met, states: "The candidate passed the pre-employment examination." Signs and forwards employment application to Employment Department.
- ii. Files laboratory results.

c) Employment Director:

Completes hiring process.

3) Test Results Positive.

a) A test result that **meets or exceeds** the cutoff levels identified in paragraph 40.12.6.B. shall be reported as positive.

b) Medical Review Officer:

- i. Telephones Employment Director, giving candidate's name and social security number, stating: "The candidate failed the pre-employment examination." Signs and forwards employment application to Employment Department.
- ii. Files laboratory results.

c) Employment Director:

- i. Advises the candidate that he or she failed the medical examination and will not be hired. The candidate is precluded from reapplying for a period of six months.

- ii. Advises the candidate that by appointment and with proper identification, the Medical Review Officer will provide a complete review of the examination results.

B. Pre-employment screening - other than Denver Metro Area

1) Collection.

a) Division Manager:

- i. Sets appointment for candidate's physical and sends him or her to an authorized collection site for drug screening (See 40.12.2 for collection sites).
- ii. Notifies the Medical Review Officer that a candidate has been sent for screening.

b) Candidate:

- i. Logs in at the collection site and presents photo identification to collection site personnel. If the candidate has no photo identification, he or she will not be allowed to complete the screening process.
- ii. Completes and signs urine custody and control form in the presence of collection site personnel.
- iii. Completes screening examination under the direction of collection site personnel in conformance with Medical Department collection protocol.

c) Laboratory:

Performs analysis, sends written results to the Medical Review Officer.

2) Test Results Negative.

- a) A test result **less than** the cutoff levels identified in paragraph 40.12.6.B. shall be reported as negative.

b) Medical Review Officer:

- i. Notifies the hiring Division Manager that the candidate passed the pre-employment examination.
- ii. Telephones results to the Employment Director giving candidate's name and social security number. Assuming all other physical qualifications are met, states: "The candidate passed the pre-employment examination." Signs and forwards employment application to Employment Department.
- iii. Files laboratory results.

c) Division Manager:

Continues hiring process.

d) Employment Director:

Completes hiring process.

3) Test Results Positive.

- a) A test result that **meets or exceeds** the cutoff levels identified in paragraph 40.12.6.B, shall be reported as positive.
- b) Medical Review Officer:
 - i. Notifies the hiring Division Manager that the candidate failed the pre-employment examination.
 - ii. Telephones Employment Director, giving candidate's name and social security number, stating: "The candidate failed the pre-employment examination." Signs and forwards employment application to Employment Department.
 - iii. Files laboratory results.
- c) Division Manager:
 - i. Advises the candidate that he or she failed the medical examination and will not be hired. The candidate is precluded from reapplying for a period of six months.
 - ii. Advises the candidate that by appointment and with proper identification, the Medical Review Officer will provide a complete review of the examination results.

C. Screening of employees returning to work from Inactive Employment Status of 90 calendar days or more.

1) Collection.

- a) Employee:

Advises management that he or she wants to return to work.
- b) Employee's management:
 - i. Sets appointment with Medical Department or collection site.
 - ii. Notifies employee of the screening appointment.
 - iii. If employee refuses to undergo screening, advises employee that he or she will not be allowed to return to work.
- c) Employee:

Provides explanation for his or her refusal.
- d) Employee's management:
 - i. If explanation seems to provide legitimate reason not to screen, seeks agreement from Medical Review Officer.
 - ii. If explanation is unsatisfactory, requests the employee to undergo screening.
 - iii. If employee still refuses to undergo screening, places the employee on indefinite suspension without pay.

e) Employee:

- i. Reports directly to the Medical Department or collection site (See 40.12.2 for site locations).
- ii. Completes screening.

f) Collection Site Personnel:

If employee refuses to complete screening, immediately advises employee's supervision prior to allowing employee to leave the facility.

Management employee repeats steps 1)b)iii. and 1)d)iii. above.

g) Medical Review Officer:

Receives test results from Laboratory.

2) Test Results Negative.

- a) A test result **less than** the cutoff levels identified in paragraph 40.12.6.A. shall be reported as negative.

b) Medical Review Officer:

- i. Telephones employee's management of a negative test result.
- ii. Files laboratory results.

c) Employee's management:

Advises employee of the test results and schedules return to work.

3) Test Results Positive.

- a) A test result that **meets or exceeds** the cutoff levels identified in paragraph 40.12.6.A. shall be reported as positive.

b) Medical Review Officer:

- i. Contacts employee directly, on a confidential basis, to provide employee an opportunity to discuss test results. See 40.12.7.B. for complete procedure.
- ii. After discussion with employee and verification of a positive test result, notifies employee's management.
- iii. Files laboratory results.

c) Employee's management:

- i. Discusses problem with employee. Informs employee that this is now an investigative interview, which could lead to disciplinary action, and he or she is entitled to union representation, if represented by the union.
- ii. Provides the employee an opportunity to explain the reason for the positive test result.
- iii. Advises employee that he or she is on indefinite suspension, without pay, pending results of the investigation. Tells the employee that he

or she will be contacted as to when to return for the results of the investigation.

- iv. May refer employee to the Employee Assistance Program for rehabilitation assessment. Seeks advice from Labor Relations and Legal, as necessary. Determines disciplinary action or employment status.
- v. Advises employee of the results of the investigation and employment status.
- vi. If employee is going to be given the opportunity to return to work, ensures employee is precluded from working until successfully completing a rehabilitation program, abiding by a re-entry agreement and being released by the Medical Review Officer.

d) Employee:

- i. Upon written request, has access to any records relating to his or her drug test and any records relating to the results of any relevant laboratory certification review, or laboratory revocation of certification proceedings.
- ii. For information concerning the employee's right to have a retest of the original specimen, see 40.12.9.

40.9 Pre-Placement Screening Procedure

40.9.1 Summary

This is the company's procedure for determining the fitness for duty of employees transferring to company positions covered by governmental regulation.

- A. Pre-placement screening, for drugs only, shall be completed before transferring to a gas department position covered by DOT regulations. This screening will not be required if the employee being transferred is already participating in random screening.
- B. Pre-access screening for alcohol and drugs shall be completed before transferring to or obtaining employment at Fort St. Vrain which requires unescorted access to the protected area. Screening at Fort St. Vrain shall be in accordance with current nuclear policies and procedures.

40.9.2 Procedures

A. Employee:

Applies for a company position covered under governmental regulation.

B. Hiring supervisor:

- 1) Advises employee that as a condition of the new position, a pre-placement drug screening must be conducted.

- 2) Advises employee that upon successful completion of the screening and assignment to the new position, the employee will be added to the list of employees subject to random drug screening.
- C. Employee:
 - 1) Completes pre-placement screening; or
 - 2) Declines to complete pre-placement screening and continues in current position.
- D. Medical Review Officer:

Receives test results from laboratory.

40.9.3 Test Results Negative

- A. A test result **less than** the cutoff levels identified in paragraph 40.12.6.A. shall be reported as negative.
- B. Medical Review Officer:
 - 1) Telephones hiring supervisor of a negative test result.
 - 2) Files laboratory results.
- C. Hiring supervisor:
 - 1) Advises employee of the test results.
 - 2) Adds employee's name to the list of employees subject to random drug screening.

40.9.4 Test Results Positive

- A. A test result that **meets or exceeds** the cutoff levels identified in paragraph 40.12.6.A. shall be reported as positive.
- B. Medical Review Officer:
 - 1) Contacts employee directly, on a confidential basis, to provide employee an opportunity to discuss test results. See 40.12.7.B. for complete procedure.
 - 2) After discussion with employee and verification of a positive test result, notifies employee's current management and hiring supervisor.
 - 3) Files laboratory results.
- C. Employee's current management:
 - 1) Discusses problem with employee. Informs employee that this is now an investigative interview, which could lead to disciplinary action, and he or she is entitled to union representation, if represented by the union.
 - 2) Provides the employee an opportunity to explain the reason for the positive test result.
 - 3) Advises employee that he or she is on indefinite suspension, without pay, pending results of the investigation. Tells the employee that he or she will be contacted as to when to return for the results of the investigation.

- 4) May refer employee to the Employee Assistance Program for rehabilitation assessment. Seeks advice from Labor Relations and Legal, as necessary. Determines disciplinary action or employment status.
- 5) Advises employee of the results of the investigation and employment status.
- 6) If employee is going to be given the opportunity to return to work, ensures employee is precluded from working until successfully completing a rehabilitation program, abiding by a re-entry agreement and being released by the Medical Review Officer.

D. Employee:

- 1) Upon written request, has access to any records relating to his or her drug test and any records relating to the results of any relevant laboratory certification review, or laboratory revocation of certification proceedings.
- 2) For information concerning the employee's right to have a retest of the original sample, see 40.12.9.

40.10 For Cause Alcohol and Drug Screening Procedure

40.10.1 Summary

This is the company's procedure for determining an employee's fitness for duty. It focuses on testing to determine the use of alcohol or drugs. The company may require an employee to undergo a screening for alcohol and/or drugs in cases:

- A. Where an employee's behavior or job performance suggests the employee may be under the influence of alcohol or using alcohol or drugs.
- B. Where information which, after investigation, provides reasonable cause to believe an employee may be under the influence of alcohol or using drugs.
- C. Where a DOT reportable accident has occurred.
 - 1) Each employee whose performance either contributed to, or cannot be completely discounted as a contributing factor to a DOT reportable gas facility accident, shall be tested for drugs as soon as possible, but no later than 32 hours after the accident.

After such an accident, testing may be unwarranted when, based on the best information available, it is determined that an employee's performance could not have contributed to the accident.
 - 2) Each employee who was involved in a DOT reportable motor vehicle accident and who receives a citation for a moving traffic violation arising from the accident shall be tested for drugs as soon as possible, but no later than 32 hours after the accident.
- D. At the discretion of the company or as required by governmental regulation, after an on-the-job accident in which a serious work injury or substantial damage to property has occurred.

40.10.2 Procedures

All procedures in this section are displayed in the "For Cause Screening Procedures" Flow Chart (Attachment 1).

A. Management employee:

- 1) Completes "Fitness for Duty Checklist" (Attachment 2).
- 2) Has one additional member of management substantiate and concur in the decision to test an employee. Either the management employee or the additional member of management shall be trained in detection of the possible symptoms of drug use.
- 3) Confronts employee, explains cause for concern and removes employee from job assignment.

B. Employee:

Provides explanation for his or her job performance or behavior.

C. Management employee:

- 1) If explanation is unsatisfactory, requests employee to undergo screening.
- 2) If employee refuses to undergo screening, advises employee that refusal to participate in the screening program will:
 - a) Be deemed insubordination, and employee will be subject to discharge.
 - b) Result in immediate removal from present job assignment.
 - c) In the case of a DOT regulated driver involved in a fatal motor vehicle accident, result in a Letter of Disqualification for a period of one (1) year.
- 3) If employee still refuses to undergo screening, places the employee on indefinite suspension without pay.
- 4) If employee agrees to undergo screening, contacts the Medical Review Officer and schedules the employee for screening. The on-duty Medical Review Officer can be contacted by telephoning:
 - a) 571-7000 during normal working hours.
 - b) The Company Operator, 571-7511, and requesting the on-duty Medical Review Officer.
- 5) Transports employee to collection site (See 40.12.2), or assigns another responsible employee to transport employee. The employee to be screened will not be allowed to drive a vehicle during this process.

D. Employee:

Completes screening.

E. Collection site personnel:

If employee refuses to complete screening, immediately advise employee's supervisor prior to allowing employee to leave facility.

Management employee repeats steps C.2) and C.3) above.

F. Management employee:

- 1) Places employee on indefinite suspension, without pay, pending results of the test and further investigation. Informs employee that if test result is negative, the time off will not be charged to the employee.
- 2) Arranges to have the employee transported home.
- 3) If the employee refuses transportation to the collection site or home, advises the employee that he or she will be considered to be insubordinate and will be subject to discharge. Advises the employee that local law enforcement will be notified that he or she is driving and that the company believes that he or she is not fit to drive.

G. Medical Review Officer:

Receives test results from laboratory.

40.10.3 Test Results Negative

A. A test result **less than** the cutoff levels identified in paragraph 40.12.6.A. shall be reported as negative.

B. Medical Review Officer:

- 1) Telephones employee's management of a negative test result.
- 2) Files laboratory results.

C. Management employee:

- 1) Notifies employee of test results.
- 2) Corrects employee's payroll record, if necessary.

40.10.4 Test Results Positive

A. A test result that **meets or exceeds** the cutoff levels identified in paragraph 40.12.6.A. shall be reported as positive.

B. Medical Review Officer:

- 1) Contacts employee directly, on a confidential basis, to provide employee an opportunity to discuss test results. See 40.12.7.B. for complete procedure.
- 2) After discussion with employee and verification of a positive test result, notifies employee's management.
- 3) Files laboratory results.

C. Management employee:

- 1) Informs employee that this is now an investigative interview, which could lead to disciplinary action, and he or she is entitled to union representation, if represented by the union.
- 2) Provides the employee an opportunity to explain the reason for the positive test result.
- 3) Tells the employee that he or she will be contacted as to when to return.

- 4) Completes the investigation. Seeks advice from Labor Relations and Legal, as necessary.
- 5) Advises employee of the results of the investigation and employment status.
- 6) If employee is going to be given the opportunity to return to work, ensures employee is precluded from working until successfully completing a rehabilitation program, abiding by a re-entry agreement and being released by the Medical Review Officer.
- 7) Issues a Letter of Disqualification to DOT regulated drivers for a positive drug test if they were involved in a fatal accident. The disqualification will remain in effect for a period of one (1) year.

D. Employee:

- 1) Upon written request, has access to any records relating to his or her drug test and any records relating to the results of any relevant laboratory certification review, or laboratory revocation of certification proceedings.
- 2) For information concerning the employee's right to have a retest of the original sample, see 40.12.9.

40.10.5 Inspection

- A. Employees, their vehicles and personal property including, but not limited to, tool boxes, gym bags, back packs, lunch boxes, briefcases and purses are permitted onto company property based on the condition that they are subject to inspection provided there is reasonable cause to believe such property may contain illegal drugs or alcohol. An exception is possession of unopened alcoholic beverage containers in a personal vehicle parked on company property.
- B. Company property, such as lockers, desks and tool boxes issued to employees in conjunction with their employment is subject to inspection.
- C. An employee who refuses to submit immediately to such an inspection of his or her vehicle or other property shall be considered insubordinate and subject to disciplinary action, up to and including discharge.
- D. If it is determined at a later date by a court of competent jurisdiction or arbitration, if applicable, that there was no reasonable cause to inspect said vehicles or property, any evidence found shall not be admissible for disciplinary action.
- E. Any suspected illegal substances confiscated from employees will be turned over to a licensed laboratory for analysis or to the appropriate law enforcement agency. The law enforcement agency will also be informed of the circumstances under which the substance was seized and the identity of the individual(s) involved.

40.11 Random Drug Screening Procedure

40.11.1 Summary

This is the company's procedure for determining the fitness for duty of those employees covered by governmental regulation. It focuses on random testing to determine the use of drugs. Management may require an employee to undergo a

random screening for drugs only, if he or she is employed in the following work categories:

- A. Employees who perform an operating, maintenance or emergency response function on natural gas pipelines or gas facilities.
- B. Employees who may be expected to operate a commercial motor vehicle, as defined in the definition section of this procedure, in interstate commerce (across state lines).
- C. Employees who have unescorted access to the protected area at Fort St. Vrain or who are required to report to the Forward Command Post.

To Be Revised

40.11.2 Procedures

All procedures in this section are displayed in the "Random Screening Procedures" flow chart (Attachment 3).

- A. Payroll/Human Resource Information Center Director

When requested, notifies the Safety and Security Director, by name, of those employees selected for random drug screening.

- B. Safety and Security Director:

Notifies the designated employee's management that the employee has been selected for the random drug screening. If there is a valid reason (sick leave, vacation, leave of absence, etc.) that the employee is unavailable the employee will not be required to be screened as a part of this selection.

- C. Employee's management:

- 1) Notifies employee of the screening appointment.
- 2) If employee refuses to undergo screening, advises employee that refusal to participate in the random screening program will:
 - a) Be deemed insubordination, and employee will be subject to discharge.
 - b) Result in immediate removal from present job assignment.

- D. Employee:

Provides explanation for his or her refusal.

- E. Employee's management:

- 1) If explanation seems to provide legitimate reason not to screen, seeks agreement from Medical Review Officer.
- 2) If explanation is unsatisfactory, requests the employee to undergo screening.
- 3) If employee still refuses to undergo screening, places the employee on indefinite suspension without pay.

- F. Employee:

- 1) Reports directly to the collection site (See 40.12.2 for site locations) as soon as possible after being notified.
- 2) Completes screening.

3) Returns to work assignment.

G. Collection site personnel:

If employee refuses to complete screening, immediately advises employee's supervision prior to allowing employee to leave the facility.

Management employee repeats step C.2) and E.3) above.

H. Medical Review Officer:

Receives test results from laboratory.

40.11.3 Test Results Negative

A. A test result **less than** the cutoff levels identified in paragraph 40.12.6.A. shall be reported as negative.

B. Medical Review Officer:

1) Telephones employee's management of a negative test result.

2) Files laboratory results.

C. Employee's management:

Advises employee of the test results.

40.11.4 Test Results Positive

A. A test result that **meets or exceeds** the cutoff levels identified in paragraph 40.12.6.A. shall be reported as positive.

B. Medical Review Officer:

1) Contacts employee directly, on a confidential basis, to provide employee an opportunity to discuss test results. See 40.12.7.B. for complete procedure.

2) After discussion with employee and verification of a positive test result, notifies employee's management.

3) Files laboratory results.

C. Employee's management:

1) Discusses problem with employee. Informs employee that this is now an investigative interview, which could lead to disciplinary action, and he or she is entitled to union representation, if represented by the union.

2) Provides the employee an opportunity to explain the reason for the positive test result.

3) Advises employee that he or she is on indefinite suspension, without pay, pending results of the investigation. Tells the employee that he or she will be contacted as to when to return for the results of the investigation.

4) May refer employee to the Employee Assistance Program for rehabilitation assessment. Seeks advice from Labor Relations and Legal, as necessary. Determines disciplinary action or employment status.

- 5) Advises employee of the results of the investigation and employment status.
 - 6) If employee is going to be given the opportunity to return to work, ensures employee is precluded from working until successfully completing a rehabilitation program, abiding by a re-entry agreement and being released by the Medical Review Officer.
- D. Employee:
- 1) Upon written request, has access to any records relating to his or her drug test and any records relating to the results of any relevant laboratory certification review, or laboratory revocation of certification proceedings.
 - 2) For information concerning the employee's right to have a retest of the original sample, see 40.12.9.

40.12 Medical Procedure

40.12.1 Summary

- A. This is the company's medical procedure for alcohol and drug screening; pre-employment, random, for cause, post-accident, site access, pre-placement and rehabilitation follow-up.
- B. Specimen collection procedures will be of the highest quality assuring accuracy and conformance to Department of Health and Human Services (DHHS) guidelines. The privacy of individuals who are screened will be safeguarded.

40.12.2 Collection Sites

Designated collection sites are:

- A. Public Service Medical Department
550 - 15th Street, Room 650
Denver, Colorado 80202
Telephone: (303) 571-7000
- B. The Drug Screening Center, Inc.
1009 Grant Street, Suite 201
Denver, Colorado 80203
Telephone: (303) 860-0185
- C. Alamosa Family Medical Center
1710 First Street
Alamosa, Colorado 81101
Telephone: (719) 589-3658
- D. COHBI Clinic, Arapahoe East Medical Center
5440 Conestoga Court
Boulder, Colorado 80301
Telephone: (303) 443-0687
- E. Frontier Family Practice
2029 Bluegrass Circle, #200
Cheyenne, Wyoming 82009
Telephone: (307) 632-1957

- F. La Plata Family Medicine
3235 N. Main
Durango, Colorado 81301
Telephone: (303) 259-3110
- G. Lakepoint Medical Center
29029 Upper Bear Creek Road
Evergreen, Colorado 80439
Telephone: (303) 674-3370
- H. General Care
1045 Garfield Street
Fort Collins, Colorado 80524
Telephone: (303) 482-6620
- I. Fort Morgan Medical
102 W. 9th Avenue
Fort Morgan, Colorado 80701
Telephone: (303) 867-5681
- J. Fort St. Vrain Generating Station
16805 Weld County Road 19 1/2
Platteville, Colorado 80651
Telephone: (303) 620-0111
- K. Mesa Laboratory
2525 North 8th Street
Grand Junction, Colorado 81501
Telephone: (303) 242-4243
- L. Southern Colorado Clinic
2002 Lake Avenue
Pueblo, Colorado 81003
Telephone: (719) 560-7111
- M. Summit Medical Center
P.O. Box 738
Highway 9 and School Road
Frisco, Colorado 80443
Telephone: (303) 668-3300
- N. Rangely District Hospital
511 S. White Street
Rangely, Colorado 81648
Telephone: (303) 675-5011

-To Be Revised

40.12.3 Medical Review Officer

Alan W. Burgess, M.D.
PSCo Medical Department
550 - 15th Street, Room 650
Denver, Colorado 80202
571-8450; Pager 556-0239

40.12.4 Assistant Medical Review Officers

- A. Carol A. Lipper, M.D.
PSCo Medical Department
550 - 15th Street, Room 650
Denver, Colorado 80202
571-7590; Pager 556-0061
- B. Russell W. Simpson, M.D.
PSCo Medical Department
550 - 15th Street, Room 650
Denver, Colorado 80202
571-8446; Pager 556-0265

40.12.5 DHHS Certified Laboratory

Drugscan Inc.
1119 Mearns Road
P.O. Box 2969
Warminster, Pennsylvania 18974
Telephone: (215) 674-9310

40.12.6 Alcohol and Drug Screening Cutoff Levels

- A. Random, pre-placement, for cause and returning from inactive employment status drug screenings.

- 1) Tested substances will be limited to marijuana, cocaine, opiates, amphetamines and phencyclidine.
- 2) Test results of employees will be reported as negative if they are **less than** the following cutoff levels:

	Initial Test (ng/ml)	Confirmatory Test (ng/ml)
Marijuana metabolites	100	15
Cocaine metabolites	300	150
Opiate metabolites	300	300
Amphetamines	1000	500
Phencyclidine	25	25

- 3) Specimens collected under this policy shall only be tested as described in this procedure and shall not be used to conduct any other analysis or test.

- B. Pre-employment Drug Screenings.

- 1) Tested substances will be limited to those listed below.

- 2) Test results of candidates for employment will be reported as negative if they are **less than** the following cutoff levels:

	Initial Test (ng/ml)	Confirmatory Test (ng/ml)
Marijuana metabolites	20	15
Cocaine metabolites	300	150
Opiate metabolites	300	300
Amphetamines	1000	500
Phencyclidine	25	25
Barbiturates	300	300
Benzodiazepine	300	300
Methadone	300	300
Methaqualone	300	300
Propoxyphen	300	300

- 3) Specimens collected under this policy shall only be tested as described in this procedure and shall not be used to conduct any other analysis or test.

C. Alcohol screening.

An employee subject to alcohol screening will be considered under the influence of alcohol if the test results **meet or exceed**

To Be Revised

	Initial Test	Confirmatory Test
Fort St. Vrain	0.04% Breath analysis	0.04% Breath analysis
Other company locations	0.05% Breath analysis (if available)	0.05% Serum

40.12.7 Procedures

A. Collections.

- 1) Each site shall have clearly written instructions on collection procedures in conformance with DHHS requirements.
- 2) Each site shall have adequate security to prevent unauthorized access which could compromise the integrity of the collection process.
- 3) No unauthorized personnel shall be permitted in any part of the designated collection site when urine specimens are collected or stored. Only the collection site person may handle the specimen prior to its being secured in the mailing container.
- 4) The collection site person is responsible for maintaining the integrity of the specimen collection and transfer process and ensuring the modesty and privacy of the employee.
- 5) The collection site person shall have only one donor under his or her supervision at any time.

- 6) When an employee arrives at the collection site, positive identification shall be made with a valid picture ID or identification by the employee's supervisor.
- 7) If the employee fails to arrive at the assigned time, the collection site personnel shall contact the company's Medical Review Officer.
- 8) A multiple part, carbonless Drug Testing Custody and Control form will be completed in the presence of the collector and the employee. Copies will be provided for laboratory, Medical Review Officer, employee, collector and the company. The form shall include:
 - a) Preprinted specimen identification number unique to each collection.
 - b) The employee's social security number, entered by the collector.
 - c) The company's name, address and identification number.
 - d) The Medical Review Officer's name and address.
 - e) Specification for which drugs the specimen will be tested.
 - f) Specification for the reason for which this test is conducted (pre-employment, random, for cause, post-accident, site access, pre-placement or rehabilitation follow-up) which shall be entered by the collector.
 - g) Temperature of specimen, recorded by the collector within 4 minutes.
 - h) Chain of custody documentation.
 - i) Location of collection site, name of collector, certification statement, date and signature.
 - j) Laboratory results and certification statement.
 - k) Medical Review Officer's certification statement, date and signature.
 - l) Employee's name (printed), daytime telephone number, date of birth, certification statement, signature and date, all of which shall be entered by employee.
 - m) A statement to the donor (employee) allowing him or her to make a list of prescription and over-the-counter medications that have been taken.
- 9) Each collection site shall have an enclosure where private urination can occur, a toilet for completion of urination, a suitable clean surface for writing and a source of water for washing hands. The site shall be designed or shall use necessary administrative controls to deter the dilution of specimens.
- 10) The employee shall be asked to remove any unnecessary outer garments such as a coat or jacket that might conceal items or substances that could be used to tamper with the urine specimen. All personal belongings such as purses or briefcases shall remain with the outer garments. Employee may retain his or her wallet. If requested, the employee will be provided a receipt for any personal belongings.

- 11) The employee shall be instructed to wash and dry hands prior to urination. After washing hands and before actually providing the specimen in private, the employee shall remain in the presence of the collection site person and shall not have access to water fountain, faucet, soap dispenser, cleaning agent or any other materials which could be used to adulterate the specimen.
- 12) A clean, single use, securely wrapped collection container and/or specimen bottle shall be used. The employee shall be allowed to select one of the unopened collection containers and/or specimen bottles that are available at the site. The container(s) shall be unwrapped in the presence of the employee immediately prior to being provided. The container shall also be designed to record the temperature of the urine. If the specimen temperature is outside the acceptable range, the employee may volunteer to have his or her oral temperature taken to provide evidence to counter the reason to believe the specimen was altered or substituted. (Difference of less than 1.8 degrees F. between body temperature and specimen is acceptable.)
- 13) If there is reason to suspect that a specimen has been tampered with, the employee will be asked to re-submit a specimen and both specimens will be sent to the laboratory. The second specimen shall be obtained under the direct observation of a collection site person of the same gender. The collection site person's supervisor shall concur in advance with any decision to obtain a specimen under direct observation.
- 14) If collection site person determines that specimen is not at least 60ml of urine, the employee shall be directed to drink fluids and, after a reasonable time, try again. The employee may be asked to remain up to 8 hours to provide the specimen. After 8 hours, the Medical Review Officer shall refer the individual for medical evaluation to determine whether the inability of the employee is genuine or constitutes a refusal. The Medical Review Officer shall report written results to the employee's management.
- 15) After the specimen has been provided, the employee will be allowed to wash his or her hands.
- 16) Chain of custody procedures will be followed. The employee and the collection site person shall keep the specimen in view at all times until it is sealed, labeled, signed by the employee, dated, identified with the employee's specimen number and logged by the collection site person. The collection site person then completes the urine custody and control (chain of custody) form which must accompany the specimen.
- 17) If the employee refuses to cooperate with the collection process, the collection site person shall inform the employee's supervision before allowing the employee to leave the facility and shall document the non-cooperation on the urine custody and control form.
- 18) Utilizing proper chain of custody procedures, including a tamper proof sealing system and identifying the specimen container with the same number as printed on the urine custody and control form, the specimen will be transported in a sealed shipping container by laboratory courier from the collection site to the certified laboratory or a representative of the certified laboratory. On the tape sealing the shipping container, the collection site person shall sign and enter the date specimen was sealed in the container. The collection site person shall ensure appropriate safeguarding during temporary storage.

B. Results.

- 1) The laboratory shall report all results to the Medical Review Officer. Results will be received on a single, secured printer located within the Medical Department. A hard copy of the results will be sent to the Medical Review Officer through the mail.
- 2) Only results that have been confirmed positive using gas chromatography/mass spectrometry (GC/MS) shall be reported by the laboratory to the Medical Review Officer as positive.
- 3) The Medical Review Officer reviews and interprets confirmed positive test results received from the laboratory and examines alternate medical explanations. This action may include conducting a medical interview and review of any other relevant biomedical factors.
- 4) Prior to making a final decision to verify a positive test result, the Medical Review Officer contacts the employee directly, on a confidential basis, to provide employee an opportunity to discuss the test results.
- 5) If, after making all reasonable, documented efforts, the Medical Review Officer is unable to reach the employee directly, the Medical Review Officer shall contact the employee's supervisor who shall direct the employee to contact the Medical Review Officer as soon as possible. The supervisor shall ensure that such contact is held in strict confidence.
- 6) If, after making all reasonable efforts, the supervisor is unable to contact the employee, the employee may be suspended pending further investigation.
- 7) The Medical Review Officer may verify a test as positive without having communicated directly with the employee about the test if:
 - a) The employee expressly declines the opportunity to discuss the test; or
 - b) The employee's supervisor has successfully made and documented a contact with the employee and instructed the employee to contact the Medical Review Officer and more than 5 days have passed.
 - i. The employee may present to the Medical Review Officer information documenting that serious injury or illness or other circumstances unavoidable prevented timely contact with the Medical Review Officer.
 - ii. On the basis of such information, the Medical Review Officer may reopen the verification.
- 8) If the Medical Review Officer determines that there is a legitimate medical explanation for the positive test result the Medical Review Officer shall report the test result to management as negative.
- 9) Should any question arise as to the accuracy or the validity of the laboratory test results, only the Medical Review officer is authorized to order a re-analysis of the original specimen and such re-analysis is authorized only at a laboratory certified by DHHS.

40.12.8 Split Specimens

- A. Upon arrival at the collection site, an employee may request that a split specimen be collected. The company will require the employee to pay for the cost of collection and shipment of the second specimen. Such payment shall be made by

check or money order and shall be received by the company within 24 hours of making the request.

- B. All of the collection procedures listed in 40.12.7.A. will be followed.
- C. The employee shall urinate into a collection container which the collection site person, in the presence of the employee, after determining specimen temperature, pours into two specimen bottles. The first bottle (60ml) will be used for the primary test. If the employee cannot provide the required volume for both specimens (120ml), the first specimen bottle shall nevertheless be processed for testing.
- D. A copy of the chain of custody form will accompany each bottle to the laboratory. The second specimen will be stored by the laboratory in a secured, refrigerated environment and an appropriate entry made on the chain of custody form.
- E. If the first specimen tests positive, the employee may request that the Medical Review Officer direct that the second specimen be tested in a DHHS certified laboratory for the presence of the drug(s) for which the positive result was obtained. The request for the second specimen to be tested must be submitted to the Medical Review Officer within 72 hours of the employee's having actual notice that he or she tested positive. The Medical Review Officer will not direct the laboratory to test the second specimen without having received payment from the employee for the cost of collection, shipment and analysis.
- F. The result of the test of the second specimen is transmitted to the Medical Review Officer without regard to the cut-off values in 40.12.6.A.
- G. The employee's removal from performing a safety-sensitive function is not stayed pending the results of the second test.
- H. If the result of the second test is negative, the Medical Review Officer shall consider the results of both tests as negative and the employee will be reimbursed for the expense.

40.12.9 Re-analysis of Original Specimen

If the Medical Review Officer determines there is no legitimate medical explanation for a confirmed positive test result other than the unauthorized use of a prohibited drug, the original specimen must be retested if the employee makes a written request for retesting within 60 days of receipt of the final test result from the Medical Review Officer. Only the Medical Review Officer is authorized to order a re-analysis of the original specimen. The employee may specify retesting by the original laboratory or by a second laboratory that is certified by the DHHS. The company may require the employee to pay in advance the cost of the shipment (if any) and re-analysis of the specimen, but the employee will be reimbursed for such expense if the retest is negative.

40.12.10 Follow-up Screening

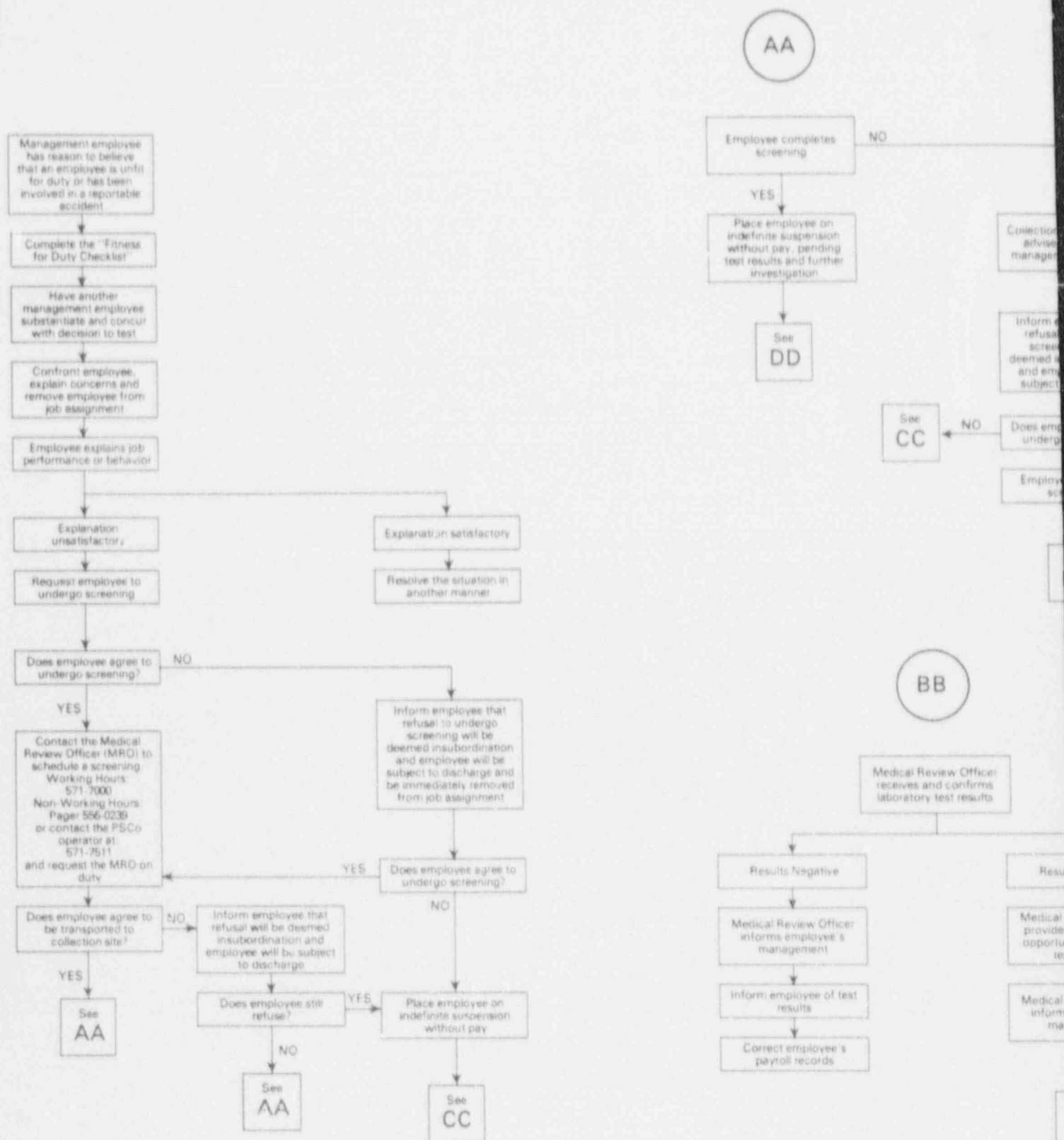
- A. If an employee who has tested positive for drugs is allowed to return to work following a rehabilitation program, the re-entry agreement shall require the employee to undergo unannounced follow-up drug screening according to the following schedule:
 - 1) Twelve (12) times in the first twelve (12) months following the employee's return to work.

- 2) Once per quarter during the second and third twelve (12) month periods.
- 3) Once during the fourth and fifth twelve (12) month periods.
- B. Employees in follow-up screening will also be subject to random screening if they are employed in positions designated for random screening.
- C. An employee who tests positive while undergoing follow-up screening is in violation of the fitness for duty policy.
- D. Except at Fort St. Vrain, if an employee who has tested positive for alcohol is allowed to return to work following a rehabilitation program, the re-entry agreement shall not require follow-up screening, but shall rely on performance indicators. At Fort St. Vrain, follow-up alcohol screening will be required.



Public Service®
PUBLIC SERVICE COMPANY OF COLORADO

Fitness For Duty - 'For Cause' Screening



Screening Procedure

ATTACHMENT 40-1

A GUIDE FOR MANAGEMENT

CC

Inform employee that this is now an investigative interview, which could lead to disciplinary action, and he or she is entitled to union representation if desired

Does employee request a union representative?

YES

Is a union representative available?

NO

Make a reasonable attempt to locate union representative

Is a union representative available?

YES

NO

Interview employee to get his or her comments (Due Process)
Conduct investigation
Employee remains on suspension without pay

Advise employee that he or she will be contacted when to return for results of investigation

NOTE: If employee has refused screening at this point, see DD for transportation procedure

Complete investigation

Advise employee of the results of the investigation and employment status

DD

Is employee willing to be escorted home?

YES

Arrange transportation

See BB

NO

Inform employee that refusal will be considered insubordination and employee will be subject to discharge
Does employee still refuse?

NO

YES

Instruct employee that local authorities will be notified that an employee determined to be unfit for duty is preparing to leave the property

Notify the authorities

See BB

SI
APERTURE
CARD

Also Available On
Aperture Card

9106260147-01



FITNESS FOR DUTY CHECKLIST

This checklist is an aid for management when an employee appears unfit for duty and the employee's job performance or behavior suggests he/she is using drugs or is under the influence of alcohol. For example, an employee exhibits uncharacteristic behavior or impaired judgement.

Procedural Steps

Date _____ Time _____

I believe _____ is unfit for duty because:

- | | | |
|--|---|--|
| <input type="checkbox"/> The employee was involved in an on-the-job accident | <input type="checkbox"/> Blank stare | <input type="checkbox"/> Unsteady walk |
| <input type="checkbox"/> Incoherent | <input type="checkbox"/> Liquor on breath | <input type="checkbox"/> Slurred speech |
| <input type="checkbox"/> Red and/or glassy eyes | <input type="checkbox"/> Drowsiness | <input type="checkbox"/> Uncharacteristic giggle |
| <input type="checkbox"/> Other uncharacteristic behavior, (list, be specific): _____ | <input type="checkbox"/> Dilated pupils | |

- ☐ Another member of management, _____, has ☐ confirmed my evaluation of the employee or has ☐ witnessed the employee's behavior and concurs with my observations.

Name of other witness(s): _____

- ☐ Confronted employee, explained why I was concerned he/she may not be fit for duty. Asked employee what might be cause of problem. (Record explanation)

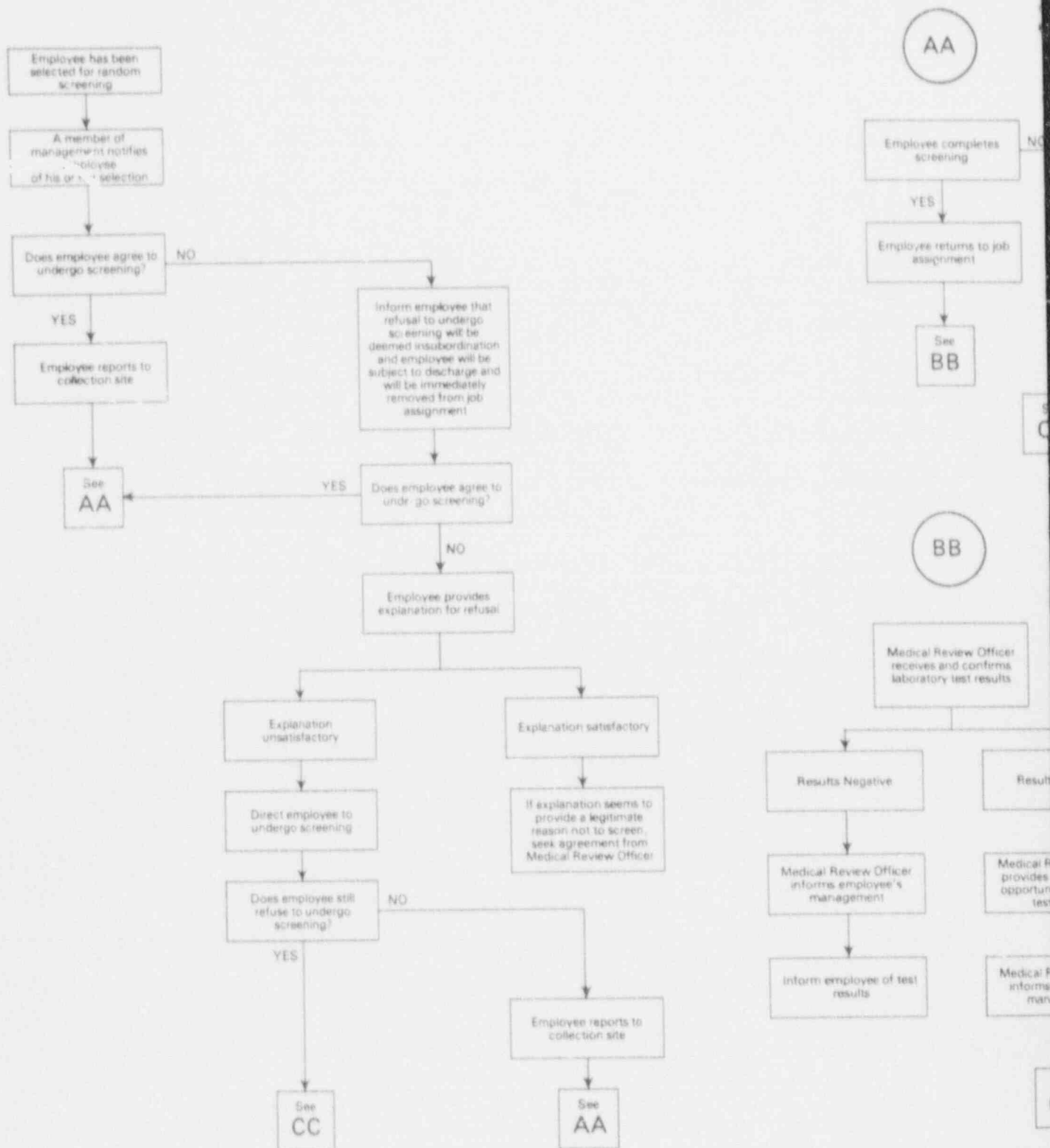
- ☐ Explanation was unsatisfactory. I ordered employee to be tested for alcohol/drugs and indicated that refusal is an act of insubordination and employee will be subject to discharge.

- ☐ Employee was taken to collection site and was not allowed to drive. (If employee refuses test, repeat order to take the test and consequences of noncompliance).

- ☐ Assured that the employee was taken home. I indicated he/she would be informed of the test results. I indicated the employee would be on suspension pending further investigation until the results of the test were received.

Print Name _____ Title _____

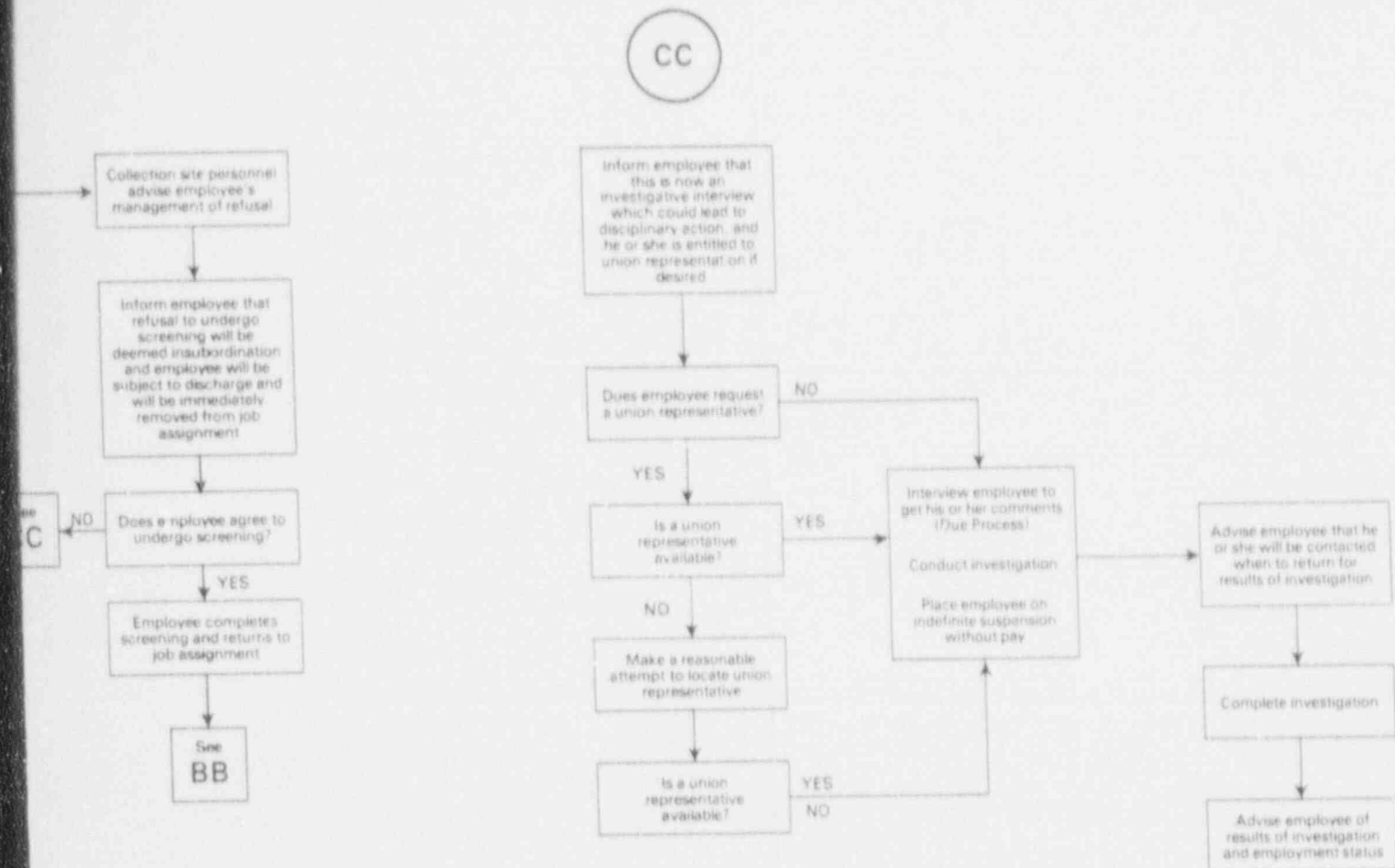
Signature _____



Screening Procedure

ATTACHMENT 40-3

A GUIDE FOR MANAGEMENT



Positive

Review Officer
employee on
ty to discuss
results

Review Officer
employee's
member

See
CC

SI
APERTURE
CARD

Also Available On
Aperture Card

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