

July 1, 1985

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MEMORANDUM FOR: James M. Taylor, Director  
Office of Inspection and Enforcement

FROM: Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

SUBJECT: EEI POLICY GUIDE - FITNESS FOR DUTY

We have reviewed the EEI Fitness for Duty Policy Guide to assure that concerns raised by the Commissioners have been addressed. Specifically, do the revised guidelines provide for appropriate action if a utility employee is found to abuse drugs or alcohol off duty? It appears that 1.i and 1.j are intended to address that issue. However, the statements "Employees in key designated positions" and "appropriate measures will be taken" are vague; specific language would better address the Commission's concerns. A suggested list of positions which might be included among "key designated positions" should be included. Also, details of possible "appropriate measures" would help to clarify that phrase.

Of a more editorial nature, Sections 4 and 5 are both supposed to address "Training for Supervisors." Neither section describes training programs, and the differences between the two sections appears very slight. It might be suggested that the two sections be merged and a training program actually be described.

When you have developed your position and proposed action on this guidance document, please include NRR on concurrence.

Original signed by  
Darrell G. Eisenhut

*for* Harold R. Denton, Director  
Office of Nuclear Reactor Regulation

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