

**PARSIPPANY - INFORMATION RESOURCES MANAGEMENT
PROCEDURES DISTRIBUTION INSTRUCTION MEMO**

GPU NUCLEAR OPERATIONAL QUALITY ASSURANCE PLAN

DATE October 25 1996

ANY CHANGES TO
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ON THE BOTTOM OF THIS MEMO
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50-219

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The enclosed Memo is being distributed to the Operational Quality Assurance Plan manual copy holders.

Enclosure

Memo #1110-96-024, "OQA Plan Interpretation No. 96-001 Fitness for Duty Procurement (Rev.8)"

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Memorandum



Subject: OQA PLAN INTERPRETATION NO. 96-001 Date: September 27, 1996
FITNESS FOR DUTY PROCUREMENT
(Rev. 8)


From: J. J. Curry Location: MCC-E3
Director, Nuclear Safety Assessment (Acting) 1110-96-024

To: OQA Plan Interpretation Log
QA Plan Control Copy Owners

The attached is an OQA Plan interpretation which "grades" Fitness-for-Duty procurement activities out of the OQA Plan scope as allowed by Section 2.3 of the Plan.

Please note this interpretation is limited to Fitness-for-Duty procurement activities. Revision 10 to the OQA Plan is being drafted and will remove the Fitness-for-Duty program from within OQA Plan scope.

Additionally, the removal of Fitness-for-Duty procurement from the OQA Plan scope does not imply that normal commercial practices shouldn't be followed (e.g. calibrations/shelf life controls in accordance with vendor instructions).


J. J. Curry
Extension 7071

DLH/JJC/sms

Attachment

cc:

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M. G. Maroldo, M.D. - GPUN Medical Director
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OQA Plan Interpretation No. 96-001

The purpose of this interpretation is to apply the graded approach for the procurement of Fitness for Duty items. The GPU Nuclear OQA Plan makes reference to Fitness for Duty as an activity within the scope of the OQA Plan (Section 2). Section 2 of the OQA Plan also states that a specific task associated with the activity will be classified as within scope or not depending upon the relationship of the task to regulatory requirements and commitments. Fitness for Duty is contained in 10CFR26.

10CFR26 requires each licensee to establish and implement written policies and procedures to meet the performance objectives and specific requirements of Part 26. Attributes such as training, record retention, chemical and alcohol testing, and auditing requirements are controlled by GPU Nuclear in procedures currently within the scope as defined by the OQA Plan.

Additionally, 10CFR26, Appendix A, identifies and requires use of commercially available HHS-certified laboratories (with pre-award inspections) and evidential-grade alcohol breath analysis equipment. Part 26 does not stipulate any further controls on the procurement of services or items to support this program.

Based on the above review, commercial standards are applicable to Fitness for Duty items. Fitness for Duty purchase requisition classification is QA Scope - No. Receipt Inspection is not required.

This interpretation does not relinquish the responsible departments from complying with and implementing the requirements of 10CFR26.