



Log # TXX-88225
File # 10004
883

William G. Council
Executive Vice President

February 29, 1988

Mr. James G. Partlow
Director, Division of Reactor Inspection
and Safeguards
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
REBUTTAL REGARDING TU ELECTRIC
FITNESS FOR DUTY POLICY

Dear Mr. Partlow:

We recently reviewed the transcript of a December 1, 1987, meeting in which the NRC Staff and the Nuclear Management and Resources Council (NUMARC) addressed the NRC Commissioners on the "status of implementation of the Fitness for Duty Program." During our review we noted statements attributed to you which referenced the TU Electric Fitness for Duty program. We appreciate the reference to our program; however, we feel that we should provide for the record a clarification of our policy. Your statement, which is on page 83, and begins on line 20 of the transcript, reads as follows:

"... Some utilities like Texas Utility, it's a situation of once and you are out. Texas Utility only take volunteers into their employee assistance program. They do not take those who have been found positive on the test into their program. They are removed from the plant permanently."

Taken in context, this is generally a correct statement of TU Electric's policy as it applies to employees (TU Electric and contractor) who are tested for cause. A complete statement of our policy is enclosed.

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SEE ATTACHED LIST

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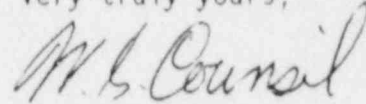
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The Company is also currently in the process of evaluating a random testing policy. In the case of random testing, a positive result will not necessarily result in the employee's termination. In such cases, absent aggravating circumstances, an employee may be enrolled in the Employee Assistance Program.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. G. Council".

W. G. Council

GLB/grr
Enclosure

c - Ms. Melinda Malloy (clo)
Mr. C. I. Grimes (clo)
Mr. R. D. Martin, Region IV (clo)
Resident Inspectors, CPSES (3) (clo)