

## **PAPERWORK REDUCTION ACT STATEMENT**

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### **Public Protection Notification**

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**ANO Documents Request, FFD Inspection  
To Be Completed July 19-23, 2021**

Please provide the attached information to the inspector for in-office inspection and review to arrive at our regional office no later than July 1, 2021. Items may be provided via CERTREC (preferred), on disc, in hard copy, or a combination of all. **NOTE: DO NOT forward any information on “flash drives” as current NRC procedures prohibit using this type of media unless issued by the NRC. Thank you in advance for your assistance.**

**Send to:**       **Attention: Dave Holman**  
                  **U.S. Nuclear Regulatory Commission**  
                  **1600 E. Lamar Blvd.**  
                  **Arlington TX 76011-4125**

**In an effort to keep the requested information organized please submit the information to us using the same lettering system below.**

**General: Please provide a copy of your primary CAP procedure. Please state which revision or date of your PSP you are currently using.**

**Fitness For Duty Program (IP 71130.08)(dated 01/01/19)**

- A     Corrective action report summaries that are any way associated with the Fitness for Duty program from August 21, 2017 to June 25, 2021 [While on site, please also provide any applicable CRs that take place between the time of your mailing and my arrival on site].
- A1    Security events logs from March 11, 2021 to June 25, 2021 [While on site, please also provide the rest of the SEL that takes place between the time of your mailing and my arrival on site].
- B     Exhaustive name list of FFD staff, either on-site or off-site, both contractors and proprietary employees, include titles. Include MRO/staff and SAE personnel. Also any alternate or supplemental urine or breath collectors.
- C     Please state whether the MRO is also the SAE or whether they are different people.
- D     Provide the total number of personnel included in your FFD program and whether or not you drug test on-site (including presumptive tests) or use an off-site contractor.
- E     Policies and procedures governing and describing your FFD program; to include FFD Policy, employee expectations, and description of the Employee Assistance Program, technique for random selection, etc., MRO procedures, SAE procedures, description of immediate and follow-up actions taken when personnel have been determined to be involved in illegal use, sale, or possession of controlled substances - or who have consumed alcohol during mandatory pre-work abstinence periods. Procedure for blind sample program.
- F     Procedures describing Collection Facility protocols, drug and alcohol collection techniques, including quality controls, tamper protection. Also include your Behavioral Observation Program procedure.

- G Employee, Escort, and Supervisor FFD Awareness Training; initial, refresher, etc (if this is a stand-alone computer based training, or embedded in GET/PAT, etc, please provide them in a printable format)
- H Manufacturer and model of any EBT or ASD breath analysis equipment in use at your site. Also manufacturer and model of any EBT/ASD calibration devices in use at your site.
- I Name and address of all Laboratories used to support your FFD program.
- J Any audits of your FFD program completed in 2018, 2019, 2020 or 2021.
- K Any audits of HHS Laboratories used by your plant in 2018, 2019, 2020 or 2021.

**Please be prepared to provide the following items upon my arrival on-site.**

- L Print complete name list of all badged personnel generated from the total number given in D. above.
- M Provide a list of any badged employees in a monitored Follow-up Program in 2018, 2019, 2020 and 2021.
- N Demonstrate that the MRO and SAE have the required qualifications/certifications stated in 26.183 and 26.187
- O Please provide a list of For Cause, Post Event tests completed in 2018, 2019, 2020 and 2021.
- P Please provide a list of (including dates) of all random tests completed in 2018, 2019, 2020 and 2021.
- Q Provide a list of all positive drug test results returned from the HHS laboratory completed in 2018, 2019, 2020, and 2021.
- R Please provide a list of known subversion attempts completed in 2018, 2019, 2020 and 2021.
- S Please provide a list of Determination of Fitness cases completed for ANO under 26.189, in 2018, 2019, 2020 and 2021. Feel free to mark and secure the list in any fashion you are comfortable with. Additionally, you may retain the list until I specifically ask to review it during the inspection.
- T Please provide a list of MRO Review cases completed for ANO under 26.185, in 2018, 2019, 2020 and 2021. Feel free to mark and secure the list in any fashion you are comfortable with. Additionally, you may retain the list until I specifically ask to review it during the inspection.
- U Please provide a list of positive alcohol tests completed in 2018, 2019, 2020 and 2021.

**LAST ITEM**