

April 8, 1993

Tom Dalzell, Esq.  
International Brotherhood of Electrical Workers  
AFL-CIO, Local 1245  
P.O. Box 4790  
3063 Citrus Circle  
Walnut Grove, California 94596

Dear Mr. Dalzell:

SUBJECT: EXEMPTION REQUEST

As mentioned in T. Murley's letter of February 17, 1993, enclosed are questions related to your request for an exemption from the random drug testing requirements of the fitness-for-duty regulations on behalf of the group of clerical workers specified in your letter of January 26, 1993.

The intent of the enclosed questions is to ascertain the measures currently in place which would minimize the risk to public health and safety should random drug testing requirements be relaxed for the specified group of union members. The information will also improve our understanding of the exemption request's scope and of the potential for both near-term and long-term impacts.

In considering this exemption request, staff is particularly interested in information related to specific measures that would serve to limit the plant access, within the protected area, of persons who would be subject to the exemption. Any information in this regard, in addition to your response to the specific questions, would be appreciated.

Sincerely,

ORIGINAL SIGNED BY

Frank J. Congel, Director  
Division of Reactor Safety  
and Safeguards, NRR

Enclosure:  
As stated

cc: Chris Warner, Esq.  
Pacific Gas and Electric Company

Distribution:  
See next page

OFC	PSGB:NRR	PSGB:NRR	BC:PSGB:NRR	OGC	PDV:NRR	PDV:NRR	D:DRSS:NRR
NAME	*CHendren	*LBush	*PMcKee	*RFonner	SPeterson	TQuay	FCongel
DATE	3/ 09 /93	3/ 09 /93	3/ 09 /93	3/ 10 /93	4/ 6 /93	4/ 6 /93	4/ 8 /93

\* - See previous concurrence, attached.

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PDR ADDCK 05000275  
PDR

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PDR/lfde  
per: Catherine Berner

46mg

DFD 1/1

## EXEMPTION REQUEST QUESTIONS

1. Your letter of January 26, 1993, used two phrases to describe the IBEW members included in your exemption request - specifically:
  - a. certain clerical employees of PG&E, and
  - b. clerical employees at Diablo Canyon.

We understand this to mean that your request only encompasses IBEW Local 1245 members who are PG&E employees assigned to certain specific clerical jobs at the Diablo Canyon nuclear plant site. Conversely, we conclude the following are not included in the request:

- (1) persons who are not members of IBEW Local 1245
- (2) persons who are not employees of PG&E (i.e., contractors, vendors).

If this interpretation is in error, please correct our understanding of the intent of your request.

2. How would those persons to be exempted be selected, e.g., individually, by job, by job category, by task, or by some other criteria? How would the list of exempted persons be maintained (monitored, updated, etc.)?
3. Approximately how many persons at Diablo Canyon would be subject to the exemption? Is it anticipated that the number of persons will vary, and if so what is the range?
4. Are there non-union workers performing jobs or tasks similar to those for which an exemption is requested? If so, how many?
5. Are the normal workstations for persons who would be subject to the exemption located within the protected area? If so, specify where in the protected area these workstations are located.
6. Are there current measures that would enable security officers and other employees to readily identify persons exempted from random testing and authorized unescorted access to protected areas?
7. Are there access control measures that would restrict an exempted person's access to plant operating equipment (e.g., feedwater pumps, main condenser pumps, etc.) inside the protected area but located away from the exempted employee's normal workstation? Are there measures or features that could facilitate such control? If so, please describe.

Enclosure (1)

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Sincerely,

~~James G. Partlow, Associate Director  
 for Projects  
 Office of Nuclear Reactor Regulation~~

Signature block changed to  
 Frank J. Congel per S. Peterson  
 (PDV) on 11 Mar 93.

Enclosure:  
 As stated

cc: Chris Warner, Esq.  
 Pacific Gas and Electric Company

Distribution:  
 See next page

OFC	PSGB:NRR	PSGB:NRR	BC:PSGB:NRR	OGG	PDV:NRR	D:DRSS:NRR	ADT:NRR	AD:NRR
NAME	CHendren	LBush	PMcKee	RFormer	SPeterson	FCongel	WTRussell	JGPartlow
DATE	3/9/93	3/9/93	3/9/93	3/10/93	3/ /93	3/ /93	3/ /93	3/ /93

Tom Dalzell

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