

NRC'S DRUG TESTING PROGRAM  
STANDARD OPERATING PROCEDURES  
Revision 1



Prepared For: Mark Lombard, Chief  
Security Branch

Approved By: 

Date: 1/13/06

Enclosure 1

## **DRUG TESTING PROGRAM STANDARD OPERATING PROCEDURES**

### **1. PURPOSE**

These Standard Operating Procedures (SOP) detail the Security Branch (SB) procedures for administering and maintaining NRC'S Drug Testing Program (DTP). They are to be reviewed in conjunction with NRC's Drug-Free Workplace Plan. These procedures are subject to change based upon experience gained by the Drug Program Manager and/or changes to agency policy.

Drug Testing records are retained, filed, and safeguarded in accordance with the System of Records (NRC-35), Enclosure 1.

Any questions regarding this SOP or suggested changes should be directed to the Drug Program Manager or Branch Chief.

### **2. RESPONSIBILITIES**

Drug Program staff are responsible for the conduct of activities described in these procedures.

### **3. REFERENCES**

3.1 Recommendations - Audit of NRC's Drug Testing Program (OIG-05-A-05)

3.2 NRC's Drug-Free Workplace Plan, Revision 2

### **4. REQUIREMENTS**

To administer NRC's Drug Testing Program in compliance with Health and Human Services (HHS) approved NRC's Drug-Free Workplace Plan (Plan) the following requirements apply.

#### **4.1 IMPORTING THE DRUG TESTING POOL**

- a. The Office of Human Services (HR) receives input from NRC offices and Regions that identifies which employees are included in the random drug testing pool. SB solicits office input based upon Plan criteria. The employees so identified are coded in the Federal Personnel/Payroll System (FPPS) by the HR specialists. HR provides a bi-weekly import file to SB.
- b. Category 2 (incident/emergency response duties) input provided by NSIR and Regional Coordinators.

- c. According to NRC's Drug-Free Workplace Plan, the following categories are subject to random drug testing:
- (1) Regional and Headquarters employees who have unescorted access to vital or protected areas of nuclear power plants, Category 1 fuel cycle facilities, or uranium enrichment facilities;
  - (2) Employees who have assigned responsibilities or are on call for Regional or Headquarters incident response centers;
  - (3) Employees with access to Sensitive Compartmented Information (SCI) and/or who require access more than once a year to classified information (e.g., National Security Information or Restricted Data); and
  - (4) Employees who are motor vehicle operators whose principal duties or backup duties include the driving of Government vehicles to transport passengers.

NRC's policy is to test 50% of the testing pool at a frequency of ten times a year. That means 5% of each of the six test groups: HQ, 01, 02, 03, 04, and RO (remote sites) are selected and tested each of the ten testing periods.

d. Processing

SB uploads drug testing pool import data from HR.

e. Discrepancy Reports

- (1) New TDP Codes without 30-Day Notice
- (2) New TDP Codes with 30-Day Notices
- (3) Changed TDP Codes
- (4) Removed TDP Codes

f. Quality Assurance

Every two years, SB reviews the HR list against the data base and works with HR to resolve discrepancies. SB re-evaluates TDP categories every two years.

## 4.2 NOTIFICATION

### a. THIRTY DAY (30-DAY) INDIVIDUAL NOTICE (Enclosure 2)

An individual notice is usually distributed by electronic mail (email) message or by written memorandum to all employees in testing designated positions (TDPs) explaining that the employee's position has been designated a "testing designated position" and that he/she will be subject to random testing no sooner than 30 days from the date of the Notice.

An employee's failure to acknowledge receipt of the Notice shall not preclude testing that employee since the general Sixty Day Notice and the Zero Tolerance Statement will previously have notified all agency employees of the requirement to be drug-free.

- Processing

Enter the date of the 30-Day Notice into the EDTTS and IPSS data bases. Delete the 30-Day Notice date after receiving HR confirmation that the employee no longer occupies a TDP. If an employee challenges occupying a TDP, the Drug Program Coordinator (DPC) makes the final decision. Delete the Notice date in both databases upon receiving confirmation from the DPC.

- Filing

Create and label file folders for 30-Day Notices and Removal Notices. File by alphabetical order and store in the appropriate security container.

## 4.3. RANDOM DRUG TESTING

### (a) RANDOM TESTING PREPARATION

#### Ordering Quality Control (QC) Specimens

Refer to current Purchase Order (PO) for ordering Quality Control Specimens from NRC's contract laboratory. Current PO is DR-03-0331 with EISohly Laboratories in Oxford Mississippi. NRC may order up to 50 specimens (37 negative and 13 positive) to submit to NRC's primary laboratory for testing. Prepare MRO list (Enclosure 3) for NRC's Medical Review Officer (MRO) to verify the accuracy of the test results. Report any discrepancies to the laboratories and to NRC's Department of Health and Human Services (HHS) contact.

(b) GENERATION OF RANDOM SELECTION TEST LISTS

Random selection test lists are produced by selecting the appropriate module in EDTTS or IPSS. The test lists identify 5% of the individuals in each of the six testing groups (Headquarters, Regions, and remote site testing pools). The target number to be tested is 50% (approximately 875 individuals) of the total drug testing pool, approximately 1750 employees, per year.

- (1) Drug Program Manager (DPM) runs the random selection generator and official random drug test lists. Reports are grouped by test group (TG), Headquarters (HQ), Regions 1 - 4 (01 - 04), and remote sites (RO).
- (2) Make an enlarged working copy and file the original in the appropriate Test Period File Folder.
- (3) Prepare Scheduling Orders (Enclosure 4) and fill in potential testing dates as directed by the DPM. Request collectors to arrive a half hour prior to the first scheduled appointment. Headquarters testing begins at 8:45 a.m., Regions I and IV at 1:30 p.m., Regions II and III at 10 a.m., and remotes at 11 a.m. Times are subject to change. Fax Orders to the appropriate BAE contact.
- (4) Update the Schedule Table (Enclosure 5) and place inside on the left side of the Test Period File Folder.
- (5) Inform DPM of confirmed testing dates.
- (6) Prepare Region and remote transmittal sheets and test lists for faxing. On the test list, include date, time, Region contact, collector names with social security numbers and date of births, and a signature/date line for the Regional Assistant Drug Program Coordinator (RADPC).
- (7) On Region and remote testing days, call the appropriate contact (Enclosure 6) and fax the test list. If a voice mail is left, ensure that you speak with a person to confirm receipt of the testing list. Ensure that you receive an annotated copy of the test list on the following day.
- (8) Update the Schedule Table in the Test Period File Folder.
- (9) Prepare and fax the MRO list (Enclosure 7) Immediately upon receipt of the annotated test list and/or chain of custody forms.
- (10) Update the Schedule Table in the Test Period File Folder.

- (11) Ensure test results are received from the MRO within 4 working days of testing. Note all pending test results and follow up with the MRO within 2 weeks of testing.
- (12) Notify employees of negative test results by email and update the EDTTS and/or IPSS data bases. Initial and date the signed MRO lists.
- (13) To report positive drug test results, refer to the Checklist for Reporting Positive Drug Test Results (Enclosure 8).
- (14) Update the Schedule Table in the Test Period File Folder.
- (15) Ensure all paperwork and chain of custody forms are filed in the appropriate Test Period File Folder.

(c) **PREPARATION OF SCHEDULING ORDERS**

In accordance with NRC's specimen collection contract, Scheduling Orders (Enclosure 4) are prepared by SB and faxed to the contract Scheduler. SB completes the top portion of the Order and the contract Scheduler completes the bottom portion, confirming the date, time, place of collection, and collector information.

(d) **SCHEDULING TESTING WITH THE SPECIMEN COLLECTION CONTRACTOR**

At least 2 weeks prior to testing, SB provides the specimen collection contractor with advanced notice of each requirement for specimen collection by completing a Scheduling Order. SB transmits the form to the contractor by facsimile. The contractor completes the bottom portion of the Order and forwards it to SB by facsimile.

(e) **HQ RANDOM TEST SET-UP PREPARATION AND NOTIFICATION PROCEDURES**

Preparation of Testing Facility

- The HQ drug testing facility is located in Two White Flint North, room T-6B3.
- The Drug Program Manager or designee remains in the testing facility to oversee the collection process and address any questions/concerns that employees may have.

- If an employee does not arrive for his/her appointment within 10 minutes of the scheduled time, attempt to contact the employee's supervisor and/or the employee in an effort to locate the employee.
- If an employee fails to provide sufficient quantity of specimen at the collection site, ask the employee to drink fluids and remain in the testing facility for up to 3 hours. If the employee refuses to wait, instruct the collector to document the chain of custody form as a refusal to test.
- Employees may use the telephone in the testing facility to contact their supervisors.

#### Notification of Supervisors and NTEU

- Approximately 30 minutes prior to the first scheduled appointment, call NTEU representative at 301-415-3600 to notify that random testing is scheduled at HQ that day. Leave voice mail message if no one answers. (Note: Subject to review of Collective Bargaining Agreement)
- Notify the employee's first level supervisor that the employee has been randomly selected for testing and email the employee's name, date, time and place of testing. Carbon copy (cc) the employee. Attach the Notice To Appear For Random Drug Test, and the Random Drug Testing Checklists for Supervisors and Employees (Enclosure 9). Begin contacting HQ supervisors at 7 a.m.
- If supervisor is unavailable, leave voice mail message and record on Call Back List (Enclosure 10) Call the appropriate Division Director and then Office Director if immediate or acting supervisor does not return call in **15 minutes**. After reasonable attempts to contact the supervisor or higher official in the employee's management chain have been made, the Drug Program staff may contact the employee directly.
- A secretary or other knowledgeable employee may be called at any time to confirm the employee's presence or absence at work.
- Allow approximately **1 hour** notification of appointment times. Do not give less than 45 minutes notification.
- Appointment times are scheduled in 15 minute increments beginning at 8:45 a.m. and ending at 3:30 p.m.
- If employee is legitimately excused from testing that day (e.g., on pre-approved leave, CWS, or travel), place on a **Deferral List** for that particular test period.

- Continue working down the test list until the number of tests required are scheduled for that day (e.g., 50).
- Names comprising the Deferral List (Enclosure 11) will be the first called on the following test period list and count toward the number of tests required for that test period. For example, if 5 names appear on the Deferral List for test period 2005-01, those 5 names will appear at the top of the 2005-02 test list, followed by the 1<sup>st</sup> 45 on the 2005-02 list, assuming a total of 50 tests are to be conducted. Drug Program staff may contact deferrals and cc the supervisor via email notification confirmation.
- Employees legitimately excused from testing that day will continue to be placed on the Deferral List until tested.
- Annotate worksheets (Enclosure 12) noting the name of the supervisor who deferred employee, the reason for deferral, and any other pertinent information. Initial and date each page of documentation.
- Allow some flexibility in appointment times during the day due to extenuating circumstances, e.g., work assignments, training, and require a postponement / re-schedule of appointment time for that day. This limited change in schedule may be coordinated between the employee and Drug Program staff, or if conflicts arise, they must be resolved between the Drug Program Manager and the employee's supervisor.
- The employee's supervisor will confirm the agreed upon appointment time with the employee.
- If employee fails to appear for testing at scheduled appointment time, the Drug Program Manager will attempt to locate the employee. If necessary, management may be contacted in an effort to locate the employee.
- Employees working from home are expected to appear for drug testing on the scheduled testing day but flexibility in appointment time may be allowed depending on the distance from home to the office. If conditions warrant, the employee may be deferred from testing and a separate day and/or place of test may be scheduled. For example, several regional employees are participating in the work at home program. If their names appear on the random test list, a Scheduling Order may be prepared and submitted to the specimen collection contractor requesting a specific date, time, and place of testing located closer to the employee's home.



(f) INSTRUCTIONS FOR COMPLETING HQ RANDOM DONOR/SUPERVISOR WORKSHEETS

- (1) Copy donor names and respective offices, in order, from the official random drug testing list onto the worksheets (Enclosure 12).
- (2) Number sequentially following the last name on the deferral list.
- (3) Identify supervisor name and phone number. Refer to the latest HR Employee and Organization Profile.
- (4) Annotate donor names having the same supervisor so that supervisor isn't called multiple times.
- (5) On random testing day, call respective supervisors and if the supervisor does not answer, leave a voice mail message and record the time you called on a "Call Back" list (Enclosure 10). If the supervisor does not return the phone call within 15 minutes, call the next higher management official, up to the Office Director, if necessary.
- (6) If the employee is legitimately excused from testing that day, write the "reason" for being excused and the name of the management official who excused the employee from testing.
- (7) Transfer names of excused employees on to a Deferral List (Enclosure 13) and indicate the test period in which they are deferred.
- (8) After testing is completed, check "tested" for those employees tested that day and re-number on the 2<sup>nd</sup> line of the worksheet to indicate the correct number of employees for testing (e.g., 50).
- (9) Initial and date each page after worksheets are completed.

(g) REGION/SITE NOTIFICATION

Contact the appropriate DRMA/backup (see Contact List, Enclosure 6) on the morning testing is scheduled at the Regional office or remote site location and transmit electronically or by facsimile the random test list of employees selected for testing and the Deferral List.

The DRMA/backup makes the appropriate Regional notifications and annotates the test and Deferral lists before transmitting them to the Drug Program staff. He/she signs and dates both lists that indicate if the employee was tested or the reason for deferral.

For remote site testing, the DRMA/backup will contact the senior resident or designated backup at the site and transmit the test list electronically or by facsimile. The senior resident or backup will verify the accuracy of the list and annotate changes on the list. All resident personnel assigned to the selected sites shall be subject to testing whether or not they are identified on the test list.

Since remote sites are randomly selected for testing and not the individual employee, if no one is available for testing that day, the test will be annotated as such, and that site will be deferred for testing within sixty days.

Individuals may be added or deleted to the remote site test list as the site is randomly selected, not the individual employee.

The test list must be annotated, and signed and dated by the DRMA/backup before transmittal to the Drug Program staff. Individuals legitimately excused from testing will not be placed on a Deferral List.

Problems or concerns must be immediately documented and reported to the Drug Program Manager.

#### 4.4 POST TESTING

Prepare MRO list with names and social security numbers of tested employees. Transmit list to the MRO by facsimile. Contact the MRO if test results are not received within 5 working days. Email employees of negative test results and update EDTTS and/or IPSS records accordingly. Refer to Enclosure 8 for instructions on reporting positive drug test results. File results in the appropriate Test Period file Folder.

#### 4.5 QUALITY ASSURANCE

Every two years:

- Validate the test pool against the current HR list. Prepare and forward memorandum to Office Directors and Regional Administrators (see sample in Enclosure 14) requesting a response to questions on the table provided as an aid to SB's re-evaluation of agency criteria for inclusion of individuals in the drug testing pool.
- Review process to verify employees are randomly selected for testing.
- Verify notification procedure is implemented in accordance with HHS requirements.

**POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:****STORAGE:**

Maintained on microfiche, disks, tapes, paper in file folders, and computer media. Documents are maintained in secured vault facilities.

**RETRIEVABILITY:**

Accessed by name (author or recipient), corporate source, title of document, subject matter, or other identifying document or control number.

**SAFEGUARDS:**

These records are located in locking metal filing cabinets or safes in a secured facility and are available only to authorized personnel whose duties require access.

**RETENTION AND DISPOSAL:**

Paper records relating to subject files are retained permanently in accordance with NRCS 1-2.2.a. Paper records relating to case files are retained permanently in accordance with NRCS 2-20.9.a. Alphabetical indexes are retained permanently in accordance with NRCS 1-2.2.a. Microfiche records are retained permanently in accordance with NRCS 2-20.9.a.

**SYSTEM MANAGER(S) AND ADDRESS:**

Records Manager, Special Inquiry Group, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

**NOTIFICATION PROCEDURE:**

Individuals seeking to determine whether this system of records contains information pertaining to themselves should write to the Freedom of Information Act and Privacy Act (FOIA/PA) Officer, Office of the Chief Information Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and comply with the procedures contained in NRC's Privacy Act regulations, 10 CFR part 9.

**RECORD ACCESS PROCEDURE:**

Same as "Notification procedure." Information classified under Executive Order 12958 will not be disclosed. Information received in confidence will not be disclosed to the extent that disclosure would reveal a confidential source.

**CONTESTING RECORD PROCEDURE:**

Same as "Notification procedure."

**RECORD SOURCE CATEGORIES:**

The information in this system of records is obtained from sources including, but not limited to, NRC

officials and employees; Federal, State, local, and foreign agencies; NRC licensees; nuclear reactor vendors and architectural engineering firms; other organizations or persons knowledgeable about the incident or activity under investigation; and relevant NRC records.

**EXEMPTIONS CLAIMED FOR THE SYSTEM:**

Pursuant to 5 U.S.C. 552a(k)(1), (k)(2), and (k)(5), the Commission has exempted portions of this system of records from 5 U.S.C. 552a(c)(3), (d), (e)(1), (e)(4)(G), (H), and (I), and (f). The exemption rule is contained in 10 CFR 9.95 of the NRC regulations.

**NRC-34 (Revoked.)  
NRC-35****SYSTEM NAME:**

Drug Testing Program Records—NRC.

**SYSTEM LOCATION:**

Primary system—Division of Facilities and Security, Office of Administration, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland.

Duplicate system—Duplicate systems exist in part at the NRC Regional office locations listed in Addendum I, Part 2 (for a temporary period of time); and at contractor testing laboratories, collection/evaluation facilities.

**CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:**

Persons including NRC employees, applicants, consultants, licensees, and contractors.

**CATEGORIES OF RECORDS IN THE SYSTEM:**

These records contain information regarding the drug testing program; requests for and results of initial, confirmatory and follow-up testing, if appropriate; additional information supplied by NRC employees, employment applicants, consultants, licensees, or contractors in challenge to positive test results; and written statements or medical evaluations of attending physicians and/or information regarding prescription or nonprescription drugs.

**AUTHORITY FOR MAINTENANCE OF THE SYSTEM:**

5 U.S.C 7301 (note); 42 U.S.C. 290dd-2; Executive Order 12564; Pub. L. 100-71, Title V Sec. 503; Pub. L. 100-440, Title VI Sec. 628; Executive Order 9397.

**ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND THE PURPOSES OF SUCH USES:**

In addition to the disclosures permitted under subsection (b) of the Privacy Act, the NRC may disclose information contained in this system of records without the consent of the subject individual if the disclosure is

compatible with the purpose for which the record was collected under the following routine uses:

- a. To identify substance abusers within the agency;
- b. To initiate counseling and/or rehabilitation programs;
- c. To take personnel actions;
- d. To take personnel security actions; and
- e. For statistical purposes.

**POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:****STORAGE:**

Records are maintained on paper in file folders and on computer media. Specimens are maintained in appropriate environments.

**RETRIEVABILITY:**

Records are indexed and accessed by name, social security number, testing position number, specimen number, drug testing laboratory accession number, or a combination thereof.

**SAFEGUARDS:**

Access to and use of these records is limited to those persons whose official duties require such access, with records maintained and used with the highest regard for personal privacy. Records in the Division of Facilities and Security are stored in an approved security container under the immediate control of the Director, Division of Facilities and Security, or designee. The Employee Drug Testing Tracking System (EDTTS) is password protected and located on a jazz cartridge and stored in an approved security container. Drug testing records are also contained in the Integrated Personnel Security System (IPSS). This system is password protected with additional roles and responsibilities protection. Social security numbers are encrypted. Both systems have approved system security plans. Records at other NRC locations and in laboratory, collection/evaluation facilities will be stored under appropriate security measures so that access is limited and controlled.

**RETENTION AND DISPOSAL:**

Employee acknowledgment of notice forms may be destroyed when employee separates from testing designated position in accordance with GRS 1-36.b. Selection and scheduling records, chain of custody records, and test results are destroyed when three years old in accordance with GRS 1-36.c, except for records used in disciplinary actions which are destroyed four years after the case is closed. Collection and handling record books are destroyed

three years after date of last entry in accordance with GRS 1-36.d. Electronic records of the Employee Drug Testing System are deleted when no longer needed in accordance with GRS 20-3.b. Index cards are destroyed with related records or sooner if no longer needed.

**SYSTEM MANAGER(S) AND ADDRESS:**

Director, Division of Facilities and Security, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

**NOTIFICATION PROCEDURE:**

Individuals seeking to determine whether this system of records contains information pertaining to themselves should write to the Freedom of Information Act and Privacy Act (FOIA/PA) Officer, Office of the Chief Information Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and comply with the procedures contained in NRC's Privacy Act regulations, 10 CFR part 9.

**RECORD ACCESS PROCEDURE:**

Same as "Notification procedure."

**CONTESTING RECORD PROCEDURE:**

Same as "Notification procedure."

**RECORD SOURCE CATEGORIES:**

NRC employees, employment applicants, consultants, licensees, and contractors who have been identified for drug testing who have been tested; physicians making statements regarding medical evaluations and/or authorized prescriptions for drugs; NRC contractors for processing including, but not limited to, specimen collection, laboratories for analysis, and medical evaluations; and NRC staff administering the drug testing program to ensure the achievement of a *drug-free workplace*.

**EXEMPTIONS CLAIMED FOR THE SYSTEM:**

Pursuant to 5 U.S.C. 552a(k)(5), the Commission has exempted portions of this system of records from 5 U.S.C. 552a(c)(3), (d), (e)(1), (e)(4)(G), (H), and (I), and (f). The exemption rule is contained in 10 CFR 9.95 of the NRC regulations.

**NRC-36**

**SYSTEM NAME:**

Employee Locator Records Files—NRC.

**SYSTEM LOCATION:**

Primary system—Part 1: Office of Human Resources, Human Resources Services and Operations, NRC, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland.

Part 2: Office of the Chief Information Officer, Infrastructure and Computer

Operations Division, NRC, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland.

Part 3: Office of Administration, Division of Administrative Services, NRC, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. Duplicate system—Duplicate systems exist, in part, for Incident Response Operations, within the Office of Nuclear Security and Incident Response, NRC, Two White Flint North, 11545 Rockville Pike, Rockville, Maryland, and at the NRC's Regional Offices, at the locations listed in Addendum I, Part 2.

Duplicate system—Duplicate systems may exist, in part, within the organization where an individual actually works, at the locations listed in Addendum I, Parts 1 and 2.

**CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:**

NRC employees, contractors, and consultants.

**CATEGORIES OF RECORDS IN THE SYSTEM:**

These records include, but are not limited to, an individual's name, address (home and business), telephone number (home, business, cell, and pager), social security number, organization, persons to be notified in case of emergency, and other related records.

**AUTHORITY FOR MAINTENANCE OF THE SYSTEM:**

44 U.S.C. 3101; Executive Order 9397.

**ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND THE PURPOSES OF SUCH USES:**

In addition to the disclosures permitted under subsection (b) of the Privacy Act, the NRC may disclose information contained in this system of records without the consent of the subject individual if the disclosure is compatible with the purpose for which the record was collected under the following routine uses:

- Notification (of individual identified by employee) in case of an emergency;
- Notification of employee regarding matters of official business;
- Verification of accuracy of and updates of payroll/personnel system files on employee home address and zip code;
- Conducting statistical studies; and
- The routine use specified in paragraph number 6 of the Prefatory Statement of General Routine Uses.

**POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:**

**STORAGE:**

Maintained on paper listings and on computer media.

**RETRIEVABILITY:**

Accessed by name and/or social security number.

**SAFEGUARDS:**

Electronic records are password protected. Paper records are maintained in locked files. Access to and use of these records are limited to those persons whose official duties require such access.

**RETENTION AND DISPOSAL:**

Paper records are destroyed after 6 months by shredding in accordance with GRS 1-17.c. The electronic record may be deleted after the expiration of the retention period authorized for the paper copy file, or when no longer needed, whichever is later, in accordance with GRS 20-3.b.2.

**SYSTEM MANAGER(S) AND ADDRESS:**

Part 1: Chief, Human Resources Services and Operations, Office of Human Resources; Part 2: Chief Information Officer; Part 3: Director, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

**NOTIFICATION PROCEDURE:**

Individuals seeking to determine whether this system of records contains information pertaining to themselves should write to the Freedom of Information Act and Privacy Act (FOIA/PA) Officer, Office of the Chief Information Officer, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and comply with the procedures contained in NRC's Privacy Act regulations, 10 CFR part 9.

**RECORD ACCESS PROCEDURE:**

Same as "Notification procedure."

**CONTESTING RECORD PROCEDURE:**

Same as "Notification procedure."

**RECORD SOURCE CATEGORIES:**

Individual on whom the record is maintained, Employee Express, NRC Form 15, "Employee Locator Notification," general personnel records, and other related records.

**EXEMPTIONS CLAIMED FOR THE SYSTEM:**

None.

**NRC-37**

**SYSTEM NAME:**

Information Security Files and Associated Records—NRC.

**SYSTEM LOCATION:**

Division of Nuclear Security, Office of Nuclear Security and Incident Response, NRC, One White Flint North, 11555 Rockville Pike, Rockville, Maryland.

mm/dd/yy

MEMORANDUM TO: Email Recipient

FROM: Timothy F. Hagan, Director  
Office of Administration

SUBJECT: 30-DAY ADVANCE NOTICE OF RANDOM DRUG TESTING

The NRC is a "zero tolerance" agency with respect to illegal drug use. Employees who serve in positions that may have a direct impact on national security and public health and safety, are subject to random drug testing. Agency records indicate that you are currently in one of these positions that meets the testing designated position criteria, as identified in the NRC Drug-Free Workplace Plan (NUREG/BR-0134). This memorandum serves as advance individual notice that you will be subject to random urinalysis drug screening not earlier than 30 days from the date of the receipt of this memorandum.

The NRC Drug-Free Workplace Plan, Section VIII.F., describes procedures that allow an employee to self-identify voluntarily as an illegal drug user before the Agency's first finding of illegal drug use. The employee who self-identifies, will not receive disciplinary action; however, will be required to seek drug abuse counseling and referral through the NRC's Employee Assistance Program Manager.

The screening procedures used by the NRC for random drug testing adhere to all scientific and technical guidelines established for Federal drug testing programs, including strict chain of custody procedures and certification requirements for laboratories engaged in urine drug testing for Federal agencies.

Verified positive findings may result in disciplinary action up to and including removal from the NRC. However, any employee whose test result is positive will be given the opportunity to submit supplemental medical documentation if he or she believes the positive result may be based on legally prescribed medication.

If you believe that you were incorrectly identified as being in a testing designated position, please inform me within 15 days of your receipt of this memorandum.

If you have any questions or need additional information, please contact NRC's Drug Program Manager at 301-415-6546.

Note: Please acknowledge receipt to Christine Secor

**NRC EMPLOYEES/CONTRACTORS WHO HAVE  
Recently Supplied Specimens**

**2005 - Applicant  
Headquarters - Susan Shank/ABLP**

	<u>Name</u>	<u>SSN</u>	<u>Test Date</u>	<u>Result</u>
1.	Linda Price	000-11-000	05/27/05	_____

\_\_\_\_\_  
Rodney V. Burbach, M.D.

\_\_\_\_\_  
Date Completing

# NRC DRUG TESTING SCHEDULING ORDER

Scheduling Order must be faxed to Tracy Hendrix @ BAE Systems and Christine Secor @  
NRC: BAE Systems fax # - (301) 838-6287/NRC Fax # - (301) 415-5364

HIRING OFFICE: HEADQUARTERS

☐ APPLICANT ☐ REGION ☐ REMOTE ☐ OTHER Part 10

Name of Person Requesting Test	Janice S. Hester
Phone Number	301-415-5883
Fax Number	
Collection Site (City and State)	Rockville, Md 20850
Local Contact & Phone No. (If different than above)	
Requested Collection Date and Time	June 2, 2005 @ 9:00    RANDOM - TESTING

NAME                      SSN#                      DOB

DONORS:

\*\*\*\*\*

## BAE Systems Verification

Collector(s) Name: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Fax: \_\_\_\_\_

Address: \_\_\_\_\_

Scheduled Collection Date: \_\_\_\_\_

Date Program Office Notified of all Information: \_\_\_\_\_

BAE Systems Signature and Date: \_\_\_\_\_

**NRC**  
**DRUG TESTING SCHEDULING ORDER**

Scheduling Order must be faxed to Tracy Hendrix @ BAE Systems and Christine Secor @ NRC: BAE Systems fax # - (301) 838-6287/NRC Fax # - (301) 415-5364

HIRING OFFICE: HEADQUARTERS

☒ **APPLICANT**   ☐ **REGION**   ☐ **REMOTE**   ☐ **OTHER Part 10**

Name of Person Requesting Test	Janice S. Hester
Phone Number	301-415-5883
Fax Number	
Collection Site (City and State)	Rockville, Md 20850
Local Contact & Phone No. (If different than above)	
Requested Collection Date and Time	June 2, 2005 @ 9:30

	<u>NAME</u>	<u>SSN#</u>	<u>DOB</u>
DONORS:	Linda Price	111-00-111	06/06/80

\*\*\*\*\*

**BAE Systems Verification**

Collector(s) Name: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Fax: \_\_\_\_\_

Address: \_\_\_\_\_

Scheduled Collection Date: \_\_\_\_\_

Date Program Office Notified of all Information: \_\_\_\_\_

BAE Systems Signature and Date: \_\_\_\_\_



**DRUG TESTING    Date:****Schedule Time**

<b>8:45</b>		
<b>9:00</b>		
<b>9:00</b>		
<b>9:15</b>		
<b>9:15</b>		
<b>9:30</b>		
<b>9:30</b>		
<b>9:45</b>		
<b>9:45</b>		
<b>10:00</b>		
<b>10:00</b>		
<b>10:15</b>		
<b>10:15</b>		
<b>10:30</b>		

January 2006

**CONTACT LIST FOR THE DRUG TESTING PROGRAM**

**REGION I**  
**475 ALLENDALE ROAD**  
**KING OF PRUSSIA, PA 19406-1415**

<b>*LYNNE BROADWATER</b>	(610) 337-5353 OR 337-5000) (RECEPT)
Linda Lamborn	(610) 337-5352
James Joyner (JHJ) (DRMA)	(610) 337-5310
Roselyn Levin (RHL)	(610) 337-5201 (Joyner's Secretary)

**FAX NUMBERS**

(610) 337-5180 \*\*  
(610) 337-5368  
(610) 337-5324

**REGION II**  
**ATLANTA FEDERAL CENTER**  
**61 FORSYTH STREET, SW**  
**SUITE 23T85**  
**ATLANTA, GA 30303-3415**

Jeff Lankford (JBL)	(404) 562-4849
Dorothy Pierluissi	(404) 562-4801
Buffy Allen (ARC1)	(404) 562-4842
Rebecca Pratcher (DRMA)	(404) 562-4800

**FAX NUMBERS**

(404) 562-4906 **MAIN NUMBER**  
(404) 562-4913  
(404) 562-4906  
(404) 562-4900

AS OF APRIL 5, 2004 REGION III changes will be:

**REGION III**  
**2443 Warrenville Road, Suite 210**  
**LISLE, IL 60532**

*Sandra Dombroski (Primary Contact)	(630) 829-9511
Chad McCormick	(630) 829-9552
	(630) 829-9518)
Brenda J. Holt (DRMA)	(630) 829-9510
Dina Sotiropoulos	(630) 829-9517

**FAX NUMBER**

(630) 515-1278 MAIN NUMBER  
(630) 515-1078

**PAGER: (630) 829-9500**

**REGION IV**  
**611 RYAN PLAZA DRIVE, SUITE 400**  
**ARLINGTON, TX 67011-8664**

Myra L. Hays (DRMA)	(817) 860-8108
Anita Tannenbaum	(817) 860-8113
Bart Dubinsky	(817) 860-8281
Joseph Lopez (JLL)	(817) 860-8133
Sandy Lindsay (SGL)	(817) 860-8237

**FAX NUMBER**

(817) 860-8122 MAIN NUMBER  
(817) 860-8210  
(817) 276-6585 (HR)

**TECHNICAL TRAINING CENTER**  
**OSBORNE OFFICE CENTER**  
**5746 MARLIN ROAD, SUITE 200**  
**CHATTANOOGA, TN 37411-5677**

Janice Paterson (JWP)  
Sharon Robertson (SKR)

(423) 855-6520  
(423) 855-6505

**FAX NUMBER**

(423) 855-6543

**EDO'S OFFICE**

(301) 415-1700

**NRC NTEU (HQ)**

DALE YEILDING

(301) 415-3600

**MEDICAL REVIEWER OFFICER**  
**DR. RODNEY B. BURBACH, M.D.**  
**5480 WISCONSIN AVE, SUITE 220**  
**CHEVY CHASE, MD 20815**

**FAX NUMBER**

(202) 483-2800 PAGER  
(301) 951-1830 FAX

## **COLLECTION CONTRACT**

NANCY LEHMAN DOT

(202) 366-9858

**FAX NUMBER** (202) 366-7436

**BAE SYSTEMS**  
**1601 RESEARCH BOULEVARD**  
**ROCKVILLE, MD 20850**

TRACY MOREGON\*

(301) 838-6289

(301) 838-6271

Rick Wrobel, Project Coordinator

(301) 838-6286

Pager (800) 759-7243 (2263799)

Cell 301-802-2507

EMERGENCY 24 HOUR NUMBER (800) 624-1433

**FAX NUMBER**

(301) 838-6287

**NORTHWEST TOXICOLOGY**  
**(PRIMARY LABORATORY)**  
**2282 SOUTH PRESIDENTS DRIVE**  
**WEST VALLEY, UT 84120**

**FAX NUMBER**

(801) 263-3605

**CLIENT SERVICES**

(800) 322-3361

(801) 293-2300

**EL SOHLY LABORATORY**  
**(SECOND LABORATORY AND QC PROVIDER)**  
**5 INDUSTRIAL PARK DRIVE**  
**OXFORD, MS 38655**

***Denise Forsyth***

**(662) 236-2609**  
***Fax (662) 324-0253***

**DrugTestingProgramContact List.wpd**

**NRC EMPLOYEES/CONTRACTORS WHO HAVE  
Recently Supplied Specimens**

**2005 - 05  
Headquarters - Random**

	<u>Name</u>	<u>SSN</u>	<u>Test Date</u>	<u>Result</u>
1.	Linda Price	000-11-000	05/27/05	_____
2.	David Wiggins	111-00-111	05/27/05	_____
3.	Craig Davis	010-01-0011	05/27/05	_____
4.	Daniel Little	110-11-000	05/27/05	_____

\_\_\_\_\_  
Rodney V. Burbach, M.D.

\_\_\_\_\_  
Date Completing

**DIVISION OF FACILITIES AND SECURITY (DFS)  
CHECKLIST FOR REPORTING POSITIVE TEST RESULTS**

**Employee Name:**

**Position:**

**Office:**

**Supervisor:**

**Test Date:**

**Drug Used:**

**MEDICAL REVIEW OFFICER (MRO) (Rodney Burbach, M.D.)**

☐ Verified that an employee's confirmed positive test result is consistent with the illegal use of drugs.

☐ Contacted the Drug Program Manager and informs him/her of this verification.

**Date:**

**DRUG PROGRAM MANAGER (Christine Secor)**

☐ Notified Chief, Security Branch (Mark Lombard)

**Date:**

☐ Notified Director, Division of Facilities and Security (Sharon Stewart)

**Date:**

☐ Notified the Drug Program Coordinator (DPC), through the Director, Division of Facilities and Security.

**Date:**



**DIVISION OF FACILITIES AND SECURITY (DFS)  
CHECKLIST FOR REPORTING POSITIVE TEST RESULTS**

**DRUG PROGRAM COORDINATOR (Tim Hagan)**

☐ Notified appropriate NRC officials and, if necessary, arranges meeting.

- ☐ Director, Human Resources (Jim McDermott)
- ☐ Director, Labor Relations (Angela Bolduc)
- ☐ EAP Manager (Jon Lobe)
- ☐ OGC Representative (John Farrington or Marv Itzkowitz)
- ☐ Employee Management

**Date and Time of Meeting:**

- ☐ Director, Division of Facilities and Security
- ☐ Deputy Director, Administration
- ☐ Chief, Security Branch
- ☐ Drug Program Manager
- ☐ Director, Human Resources (HR)
- ☐ Director, Labor Relations, HR
- ☐ EAP Manager
- ☐ Office of General Counsel
- ☐ Employee's supervisor

Employee detailed from his/her testing designated position

- ☐ Yes
- ☐ No

**DIVISION OF FACILITIES AND SECURITY (DFS)**

☐ Prepared suspension letter. (Suspends employee's access authorization (security clearance), under 10 CFR Part 10.)

**Date:**

---

**DIVISION OF FACILITIES AND SECURITY (DFS)  
CHECKLIST FOR REPORTING POSITIVE TEST RESULTS**

**EMPLOYEE'S IMMEDIATE SUPERVISOR**

☐ Contacted employee to discuss his/her positive test result

**Date:**

☐ Referred to EAP Manager

**Date:**

**EMPLOYEE ASSISTANCE PROGRAM MANAGER (EAP MANAGER)**

☐ Met with the employee

**Date:**

☐ Arranged for assessment by the Drug Rehabilitation Assessment Coordinator (DRAC).

**Date:**

**Name of DRAC:**

☐ Contacted the DRAC to determine whether the employee called to arrange and/or attended the meeting.

**Date:**

**Date and Time of Assessment:**

☐ Coordinated exchange of information between the DRAC, MRO, and agency to provide sufficient information to make assessment.

**Date:**

**DRUG REHABILITATION ASSESSMENT COORDINATOR (DRAC)**

☐ Called EAP Manager after meeting with the employee.

**Date:**

**DIVISION OF FACILITIES AND SECURITY (DFS)  
CHECKLIST FOR REPORTING POSITIVE TEST RESULTS**

**EMPLOYEE**

☐ Refused to call the DRAC.

If Employee refused to call DRAC

☐ The Office of Human Resources initiated a proposed removal action for refusing to obtain counseling or rehabilitation through an Employee Assistance Program, as required by Executive Order 12564.

**Date:**

☐ Agreed to treatment/education and signed and dated the treatment plan.

**Date:**

**DRUG REHABILITATION ASSESSMENT COORDINATOR (DRAC)**

☐ Provided the EAP Manager with a written assessment of the employee and recommendations regarding appropriate follow-up action.

**Date:**

**EMPLOYEE ASSISTANCE PROGRAM MANAGER (EAP)**

☐ Provided DPC with a copy of the DRAC assessment report that is placed in the employee's file, DTP 45.00.00.

**Date:**

**DRUG PROGRAM COORDINATOR (DPC)**

☐ Signed a letter prepared by DFS that notifies the employee of his/her positive test result and if applicable, informs the employee that he/she will be detailed from a TDP to a non-TDP, effective immediately. In addition, this letter confirms the employee's agreement to an assessment by the DRAC and to participate in an NRC approved treatment/education program.

**Date:**

**DIVISION OF FACILITIES AND SECURITY (DFS)  
CHECKLIST FOR REPORTING POSITIVE TEST RESULTS**

- ☐ Mailed the letter to the employee's home address or arranged hand delivery of the letter to the employee and placed a copy in DTP 45.00.00.

**Date:**

**DIVISION OR OFFICE DIRECTOR/REGIONAL ADMINISTRATOR**

- ☐ Issued proposed disciplinary action, e.g., proposed removal from Federal service or letter of admonishment, to the employee (either before or after the employee enrolled in a rehabilitation program).

**Date:**

- ☐ Placed a copy of proposed disciplinary action in DTP 45.00.00.

**Date:**

**EMPLOYEE**

- ☐ Responded orally and/or in writing to the proposed disciplinary action to the DPC.

**Date:**

- ☐ Completed rehabilitation or a drug education program as recommended by the DRAC (is returned to his/her TDP if applicable) and is subject to follow-up drug testing, arranged by DFS.

**Date:**

**DRUG PROGRAM COORDINATOR (DPC)**

- ☐ Determines the duration and frequency of follow-up testing based on the DRAC's recommendation and input from the EAP Manager, Drug Program Manager, and HQ ADPC.

**Date:**

- ☐ Decides on the appropriate disciplinary action.

**Date:**

**DIVISION OF FACILITIES AND SECURITY (DFS)  
CHECKLIST FOR REPORTING POSITIVE TEST RESULTS**

**DIVISION OF FACILITIES AND SECURITY (DFS)**

☐ May reinstate the employee's security clearance under 10 CFR Part 10 procedures.

**Date:**

**Note:** When a drug education program and two years of followup testing are recommended, DFS may revisit the issue of reinstating the employee's security clearance after one year of followup testing has been successfully completed.

1

Nov 2004

NOTICE TO APPEAR FOR RANDOM DRUG TEST

You have been selected for random drug testing and your random urine specimen collection appointment is scheduled today at \_\_\_\_\_ a.m./p.m. You will be in an official duty status for this activity, no personal leave need be taken. Report to the **DRUG TESTING FACILITY, ROOM 6-B-3** located on the **SIXTH FLOOR OF TWO WHITE FLINT NORTH.**

Be sure you take photo identification such as NRC photo badge or driver's license with photo. If you have any questions, check with your supervisor or the Agency's Drug Program Manager at 415-6546 or 415-0265.

\_\_\_\_\_ on \_\_\_\_\_ at \_\_\_\_\_ a.m./p.m.  
(Printed Name of Supervisor) (Date) (Time)

\_\_\_\_\_  
(Printed Name of Employee)

\_\_\_\_\_  
(Supervisor's Signature)  
Or Drug Program Manager's signature

\_\_\_\_\_  
(Employee's Signature)

Please return this document to your collection technician or designated Division of Facilities and Security representative upon arrival at the collection site.

November 2004

**RANDOM DRUG TESTING CHECKLIST FOR SUPERVISORS**

On the actual date that random drug testing is scheduled to be conducted, your Assistant Drug Program Coordinator (ADPC), Drug Program Assistant (DPA), or Site Coordinator (SC) will notify you which of your employees have been selected for drug testing and the proposed schedule. Some flexibility may be allowed in scheduling appointments due to extenuating work assignments. Please contact your ADPC or agency Drug Program Manager to resolve any potential scheduling problems. Employees may be deferred from testing in accordance with Section IX.F. of the Drug-Free Workplace Plan. The following procedures should be followed in notifying employees of the collection process.

1. Approximately 1 hour prior to the actual collection, inform the employee verbally, and privately, that he/she has been identified through a random selection process for drug testing by urinalysis. Clearly inform the employee in writing by completing the **"Notice to Appear for Random Drug Test"** form as to the time and where to report, including specific address and directions to report for testing and instruct him/her to take appropriate photo identification, such as NRC photo badge or driver's license with photo. Supervisors shall maintain a copy of the completed Notice until close of business the following workday.
2. Employees normally will be scheduled to report to the collection site at 15 minute intervals. Coordinate any scheduling changes necessary to maintain work operations closely with the ADPC/DPA/SC. Do not make any unilateral changes.
3. In no instance will a Headquarters or Regional employee not identified on the official test list, maintained by the ADPC/DPA/SC during collection, be tested. (Names may be added to/deleted from an official remote site test list.)
4. The collection will be performed by professionally trained contractor personnel, who will ensure the process is properly administered. Advise employees to be prepared to provide a urine specimen at the scheduled collection time.
5. Provide the **"Random Drug Testing Checklist for Employees,"** dated November 2004, which provides helpful information about the collection process, to scheduled employees.
6. When an employee selected for random testing is unavailable for legitimate reasons (e.g., working different shift, travel, prior approved leave, or employee is at work but an emergency condition exists), you must inform the ADPC/DPA/SC who will annotate the random test list by indicating the reason for any employee deletion from the list. Once a person has been notified of testing, only those verifiable leave requests for family or medical emergencies submitted by employees for the testing day should be considered.
7. Immediately report any problems encountered during employee notification to the ADPC/DPA/SC. Employees who fail to cooperate with the collection procedures will be

subject to disciplinary actions consistent with NRC regulations. (Guidance from NRC's labor relations staff shall be obtained in these instances.)

**RANDOM DRUG TESTING CHECKLIST FOR EMPLOYEES**    Nov 2004

You will be participating in NRC's Drug Free Federal Workplace Plan designed to support Executive Order 12564 for a drug free Federal workforce. You have been identified through a random selection process for drug testing by urinalysis. The five drugs or classes of drugs that your specimen will be tested for include: (1) marijuana metabolites, (2) cocaine metabolites, (3) opiate metabolites, (4) phencyclidine, and (5) amphetamines. Please be assured that your selection and the selection of other employees for such drug testing in no way reflects that NRC has any specific cause to suspect the use of illegal drugs. The process by which you have been selected uses a computer program to select, on a random basis, individuals to be tested. The number of individuals selected for drug testing is predetermined by percentage of the testing pool.

Refusal to submit to testing when notified or failure to cooperate with the collection procedures will be grounds for disciplinary action, including, in appropriate cases, removal from the Federal service.

The following checklist items have been developed to ensure that uniform and accurate collection procedures are followed with each individual participating in the program.

1. Please arrive at the collection site on time. Collection personnel are required to contact an NRC representative for guidance if you do not appear at the assigned time.
2. Collection site personnel will ask you to verify your social security number and provide appropriate photo identification, such as an NRC photo badge or driver's license with photo. Again, collection personnel are required to contact an NRC representative for guidance if proper identification is not obtained. You will be asked to verify your social security number and provide your initials/signature at several stages throughout the collection process. These precautions are for your protection and will help ensure that all specimens are labeled correctly.
3. Collection site procedures will be explained by a technician usually of the same gender as yourself. Personnel will also be available to answer any questions you might have or you will be referred to the appropriate NRC representative.
4. You will be asked to remove outer garments such as overcoats, suit jackets, hats etc. You may not take a carrying bag into the collection room, but you may take your wallet with you.
5. Effective November 1, 2004, revised HHS Mandatory Guidelines state that collection personnel shall be required to direct you to empty your pockets and display the items to ensure no items are present that could be used to adulterate your specimen. If nothing is there that could be used as an adulterant, you may place the items back in your pocket and proceed with the normal collection procedure.



6. If an item appears to have been brought to the collections site with the intent to adulterate, your specimen will be collected under direct observation. If a same gender collector is not available, an agency representative of the same gender as yourself will serve as the observer. The Headquarters or Regional official monitoring the collection process will be consulted regarding any questionable items. If you decline to allow a direct observation collected when required, it is considered a refusal to test.
7. If an item that could possibly be used as an adulterant appears to be inadvertently brought to the collection site, the collector shall secure the item and continue with the *normal unobserved collection procedure*.
8. If you refuse to show the collection technician all items in your pockets, this is considered a "refusal to test" and appropriate disciplinary action will be initiated after consultation with the labor relations staff.
9. Your technician will provide you with a specimen collection container and instructions. (You may ask to select a specimen collection container/kit from those available.)
10. The collection technician will ask you to wash and dry your hands before providing the sample.
11. Unless otherwise directed by NRC, you will provide your sample within the privacy of the collection room or otherwise partitioned area such as a stall.
12. Do not flush the toilet until you have handed the specimen to the collection technician.
13. Under NRC's split sample collection procedures you will be asked to provide a sufficient volume of urine so that your specimen can be split into two portions.
14. You will give the collection container to the technician who will check the general appearance of the sample. The temperature must be taken within four minutes of completing the void and be in an acceptable range of 32-38°C/90-100°F. **If the temperature is outside the acceptable range, a direct observation collection will be conducted.** The collection technician will record an appropriate comment on the "Remarks" line of the coc form. Both specimen samples will be sent to the testing laboratory.
15. The technician will transfer the specimen to two shipping bottles. The technician will tighten the bottle caps and place the security/bottle custody seals over the caps and down the sides of the bottles. You should have initialed and dated the seals confirming that it is your sample in the bottles and that the specimen identification number is correct. You must observe this process continuously.
16. If you desire, you may list prescription medication on the back of your copy of the chain of custody form. **Revised chain of custody procedures do not allow for listing such**

medication on the copy of the chain of custody (coc) form going to the Medical Review Officer (MRO). If your test result is positive, the MRO will contact you in an effort to justify the positive result. At this time, you may provide information pertaining to any prescriptions you may be taking.

17. You will be asked to read and sign a statement on the chain of custody form certifying that the specimen came from your body.
18. If you do not provide at least 30 ml of urine, **your specimen will be discarded and you will be invited to get something to drink and to wait in the immediate area of the collection activity for up to 3 hours or until you provided a sufficient volume of urine for the second specimen, whichever occurs first.** The collection technician is not allowed to collect and add or combine urine from two separate voids. If you refuse to provide a second specimen, this is considered a refusal to test.

If sufficient volume of urine can be provided, e.g., 30 - 45 ml, its temperature will be taken and the sample will now be prepared for shipment in accordance with item 11. If you are unable to provide more than 30 ml of urine, your specimen will nevertheless be processed for testing.

19. **If the collection technician has reason to believe that the urine specimen has been tampered, altered or substituted, he/she will notify the appropriate NRC representative. Should you tamper, adulterate or in any other manner attempt to alter the specimen, the technician will request authorization from the appropriate NRC representative to collect a second specimen of sufficient volume under direct observation by a same gender collection site individual. Both specimens will be sent to the laboratory for analysis.**
20. You will be asked to wash your hands after providing your specimen.
21. The collection technician may use the space provided on the first page of the chain of custody form for remarks concerning the collection.
22. The technician will then give you your copy of the completed chain of custody form.
23. **Both portions of your specimen will be sent to the same testing laboratory. If the test of the first portion of specimen is verified positive by the MRO, he/she will report the result to the NRC as a verified positive. You may request the MRO to test the second (split) portion of your specimen at either NRC's primary or secondary testing laboratory. You must make this request to the MRO within 72 hours of being told by the MRO that your test result is positive.**
24. **Effective, November 1, 2004, all specimens will undergo validity testing by NRC's contract laboratory. This means that a test result may be reported as positive and adulterated, substituted, dilute, or invalid. The revised HHS Guidelines provides donors with the same right to challenge the accuracy of a substituted or adulterated specimen and you may request the MRO to test another aliquot of a**

single specimen or test the split portion at NRC's primary or secondary contract laboratory. Donors are not allowed to request retesting of specimens reported as invalid.

25. Be aware that the MRO may require an immediate direct observation collection if your test result is reported as invalid.
26. Be aware that dilution of a urine specimen may occur by consuming large volumes of liquid, sometimes in connection with a diuretic, or by adding water or another liquid to a specimen. Due to donor privacy considerations, dilution and substitution may be undetected by collection technicians and be viable methods for defeating drug tests. Therefore, HHS Guidelines direct the MRO to inform agencies that when a specimen has been reported as negative and dilute, the agency may require the specimen to be collected using direct observation the next time the donor is randomly selected for drug testing.
27. If you have any concerns or questions about the collection process, you should immediately bring them to the attention of your supervisor or the Headquarters or Regional Official monitoring the collection process.
28. You will be notified of your negative test result by e-mail or positive test result in writing as soon as it becomes available.

Drug Program Manager: 301-415-6546, pager 1-800-213-4834

[illegible]

**NRC EMPLOYEES/CONTRACTORS WHO HAVE  
Recently Supplied Specimens**

**2005 - 05  
Region I - Random**

	<u>Name</u>	<u>SSN</u>	<u>Test Date</u>	<u>Result</u>
1.	* Linda Price	000-11-000	05/27/05	_____
2.	** David Wiggins	111-00-111	05/27/05	_____
3.	Craig Davis	010-01-0011	05/27/05	_____
4.	Daniel Little	110-11-000	05/27/05	_____

\_\_\_\_\_  
Rodney V. Burbach, M.D.

\_\_\_\_\_  
Date Completing

\* Deferral from 2005-03

\*\* Deferral from 2005-04

HEADQUARTERS DRUG TESTING  
RANDOM/VOLUNTARYTEST PERIOD: 2005

DATE: \_\_\_\_\_

Donor: \_\_\_\_\_

Ofc: \_\_\_\_\_

Supervisor: \_\_\_\_\_

Phone: 415- \_\_\_\_\_

Excused By: \_\_\_\_\_

☐ Will Call

Reason: \_\_\_\_\_

☐ Scheduled☐ Tested

Donor: \_\_\_\_\_

Ofc: \_\_\_\_\_

Supervisor: \_\_\_\_\_

Phone: 415- \_\_\_\_\_

Excused By: \_\_\_\_\_

☐ Will Call

Reason: \_\_\_\_\_

☐ Scheduled☐ Tested

Donor: \_\_\_\_\_

Ofc: \_\_\_\_\_

Supervisor: \_\_\_\_\_

Phone: 415- \_\_\_\_\_

Excused By: \_\_\_\_\_

☐ Will Call

Reason: \_\_\_\_\_

☐ Scheduled☐ Tested

Donor: \_\_\_\_\_

Ofc: \_\_\_\_\_

Supervisor: \_\_\_\_\_

Phone: 415- \_\_\_\_\_

Excused By: \_\_\_\_\_

☐ Will Call

Reason: \_\_\_\_\_

☐ Scheduled☐ Tested

SAMPLE

Deferrals - Headquarters  
Random 2006- 04 Day 1

<u>Name:</u>	<u>Office:</u>	<u>Original Test Period:</u>	<u>SSN:</u>	<u>Comments:</u>
Peter Jones,	NRR	(2006-02)	100-20-2000	_____
John Smith	NMSS	(2006-02)	200-10-1000	_____
Mark Ray	NRR	(2006-02)	300-30-3000	_____
Jess Lang,	NSIR	(2006-03)	400-50-5000	_____
Mary Corbin,	NRR	(2006-03)	500-40-6000	_____
Patricia Sil,	ADM	(2006-03)	600-20-4000	_____
Brent Moz,	OIS	(2006-03)	300-50-2000	_____
Victor Bin,	NRR	(2006-03)	037-20-9716	_____



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 3, 2004

Enclosure 14

SAMPLE

MEMORANDUM TO: See Attached List

FROM: Michael L. Springer, Director  
Office of Administration *MSpringer*

SUBJECT: REVIEW OF DRUG TESTING DESIGNATED POSITIONS AND  
SECURITY CLEARANCES

In recent years, NRC has experienced an increase in the number of employees requiring access to classified information. Because this level of access impacts both security clearance determinations and whether or not the individual occupies a testing designated position under our Drug Free Workplace plan, we are requesting each office and region to review and confirm the level of access to classified information that each of your employees requires. We are providing the attached table for this purpose (Attachment 1).

The information you provide will assist ADM in assuring that NRC employees continue to possess appropriate security clearances. In addition, your response to the questions on the table will be helpful in our re-evaluation of Agency criteria for inclusion of individuals in the drug testing pool under the Drug Free Workplace program. The following additional guidance regarding security clearances and criteria for determining testing designated positions is provided to assist you and your staff in completing the table:

Security Clearances

All employees of the Nuclear Regulatory Commission are required by the Atomic Energy Act to be eligible for access to classified information. For security clearance purposes, Executive Order 12968, "Access to Classified Information," requires agencies to make an eligibility determination based on the level of classified information that must be accessed for an employee to perform his/her job responsibilities. The intent of this Order is to limit the granting of a security clearance to the lowest level of classified information for which there is a need. The Order prohibits requesting or approving eligibility for access to classified information in excess of actual requirements.

With this in mind, we ask that you consider the following in determining the need for access to classified information:

- All NRC employees require at least an L security clearance permitting access to secret National Security Information (NSI) or confidential Restricted Data (RD) and access to most of the classified information at NRC requires only an L clearance.
- Individuals in positions of high public trust require L(H) clearances.
- Individuals who require access to higher levels of classified information, top secret or secret RD or top secret NSI, to effectively conduct their NRC duties (as identified by their management) will require Q security clearances.



Attachment 2 provides more detailed information regarding position sensitivity criteria contained in Management Directive 12.3. As you apply these criteria, please also note that maintaining a Q or an L(H) clearance is significantly more expensive to the NRC than an L clearance, costing the NRC several thousand dollars per clearance every 5 years.

#### Drug Testing Criteria

Based on the results of a recent review of NRC Drug Free Workplace Plan, ADM is re-evaluating the Agency criteria for inclusion of individuals in the drug testing pool. Current NRC criteria for inclusion of individuals in the drug testing pool are provided under Attachment 3. Among other areas, our evaluation is focusing on the level of access to classified information each employee requires and the need for employees to access vital or protected areas at licensee facilities. With respect to employee access to classified information, the Plan currently requires that an employee be included in the drug testing pool if they have access to classified information more than once or twice a year. Options are under consideration to clarify this testing category. Regarding employee access to vital areas, we do not anticipate changing the criteria but need to ensure that NRC is capturing all such employees in the drug testing pool.

Please complete and return the table to Patricia Smith, Personnel Security Team Leader, Mail Stop T-6E46 by November 29, 2004, along with the identity of a member of your staff that we may contact to discuss the information and related administrative matters (including the re-badging of individuals whose security clearance levels change).

If your staff needs assistance in completing these determinations, please have them contact Ms. Smith at (301) 415-7739 or Mark Lombard, Chief, Security Branch, Chief, at (301) 415-7404.

Attachments: As stated

04

double  
negative

Attachment 1

Office	Division	Name	Current security clearance (Q, L(H), L)	Required security clearance level. (Q, L(H), or L). Annotate only if a change is needed.	Is expected to require unescorted access to vital or protected area of nuclear power plants, Category I fuel cycle facilities, or uranium enrichment facilities? (yes or no)	Is expected to require access to Classified information 2 or more times in the next 12 months? (yes or no)
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