

NP 1.7.17

FITNESS FOR DUTY - CONTINUAL
BEHAVIOR OBSERVATION
PROGRAM

DOCUMENT TYPE: Administrative

REVISION: 3

EFFECTIVE DATE: November 22, 2002

APPROVAL AUTHORITY: Department Manager

PROCEDURE OWNER (title): Group Head

OWNER GROUP: Security

C-16

FITNESS FOR DUTY - CONTINUAL BEHAVIOR
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1.0 PURPOSE

To provide reasonable assurance that nuclear power plant personnel with unescorted access continue to be reliable, trustworthy and mentally and physically fit to safely and competently perform their duties.

2.0 DISCUSSION

2.1 Scope

2.1.1 To ensure the detection of alcohol and drug abuse and other behavior that may be a potential threat to interrupt the normal operation of PBNP.

2.1.2 Provide training which reasonably ensures management/supervisory personnel have the awareness and sensitivity to detect and report changes in behavior, to include suspected alcohol and drug abuse, which adversely reflects upon the individual's trustworthiness or reliability and to refer these persons to WE management for appropriate evaluation and action.

2.2 Applicability

This procedure applies to all WE Energies (WE) and contractor personnel badged for unescorted access to the Point Beach Nuclear Plant (PBNP). Work locations would include Milwaukee, Appleton and PBNP.

2.3 Definitions

2.3.1 *CBOP* - Behavioral observation, conducted by supervisors and management personnel, designed to detect individual behavior changes which, if left unattended, could lead to acts detrimental to public health and safety.

2.3.2 *Arrest* - Being taken into custody by an authority of the law, incarcerated (i.e., taken to jail or court), or charged with a criminal offense but not taken into custody; convicted of a criminal proceeding for the violation of any law, regulation or ordinance other than one of non-injury traffic, parking, or other minor offense, insignificant to trustworthiness.

2.3.3 *Administrative Hold* - the removing of an active authorized unescorted access picture badge from the badge rack and placed into the Secondary Alarm Station (SAS) until returned to service by a PBNP WE security representative.

2.3.4 *Aberrant Behavior* - Behavior which deviates from the normal behavior for the individual.

2.3.5 *Critical Incident* - Incident which occurs that brings into question an individual's trustworthiness or reliability and is significant to have an impact on the continued authorized unescorted access of the individual.

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- 2.3.6 *Reliability* - The state or quality of being able to be relied on to safely and competently perform ones duties.
- 2.3.7 *Credible Information* - offering reasonable ground for being believed.
- 2.3.8 *Reasonable* - Not conflicting with reason; not extreme or excessive; moderate; fair.
- 2.3.9 *Suspicion* - The act of instance of suspecting something wrong without proof or on slight evidence.
- 2.3.10 *Threat* – A declaration of intention or determination to inflict punishment, loss, pain, injury or harassment on another employee or to the company.
- 2.3.11 *Violence* – The unjust or unwarranted exercise of force upon another employee.

3.0 RESPONSIBILITIES

3.1 PBNP Personnel With Unescorted Access

All personnel granted unescorted access to PBNP must report suspicious activity or observed action to their supervisor or WE liaison that may lead to damage to facilities or be detrimental to the safety of the plant or general public.

- 3.1.1 All workers are responsible for:
 - a. Reporting to work mentally and physically fit for duty.
 - b. Notifying supervision:
 - (1) If they consider themselves not fit for assigned duties
 - (2) Of any problems such as mental stress, fatigue, or illness that may affect fitness.
 - (3) Whenever called for unscheduled work, notifying the caller of any alcohol consumed within the previous five hours or whether they consider themselves not fit for duty.

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- 3.1.2 Supervision evaluates Fitness for Duty concerns/reports in accordance with following guidelines.
- a. If the information/observation indicates worker may not meet fitness for duty policy requirements (e.g. may not be mentally or physically fit for duty, or has been involved in an accident:
 - (1) When possible, obtain the assistance of another supervisor or a reliable, independent witness.
 - (2) In the presence of the assisting supervisor or witness, inform the worker of the behavior that indicates the worker may not be fit for duty.
 - (3) Request an explanation of observed behavior from the worker.
 - (4) Initiate for-cause testing & removal from duty in accordance with site fitness for duty procedures if the behavior:
 - indicates reasonable suspicion of drug or alcohol use, or
 - is sufficiently aberrant (e.g. disrupts workplace, endangers self or others, or the safe operation of the plant),
 - Meets post-accident test requirements.
 - b. If the behavior is due to an isolated instance of fatigue, stress, illness or a temporary physical impairment:
 - (1) The worker may be assigned to other duties or sent home (do not allow workers to drive home if you are concerned about their driving safety).
 - (2) If you send an employee home, record the remainder of the day as paid time off.
- 3.1.3 If you are uncertain whether the worker meets fitness for duty policy requirements (e.g. whether you have reason to question the worker's mental or physical fitness). Consider:
- 3.2 Increasing observation of the worker to determine if there is a fitness for duty concern.
- 3.3 Calling Security, Human Resources or the EAP to seek a professional opinion on the situation.

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3.4 WE and Contractor Supervisory Personnel

All WE and contractor supervisory personnel are to notify their WE manager or WE liaison whenever there is concern that an individual may be impaired. Such impairment could effect the safe operation of the plant.

3.4.1 All observations are to be reported to a WE manager to ensure a review of the incident is provided by more than one supervisor.

3.4.2 Managers and supervisors are in frequent contact with their personnel and are most familiar with their personnel's normal behavior patterns. Therefore, the supervisors are in the best position to detect changes in employees behavior and to initiate appropriate corrective action.

3.5 PBNP Fitness For Duty (FFD) Administrator

The PBNP Fitness For Duty (FFD) Administrator shall:

3.5.1 Interpret PBNP CBOP policy and provide coordination of resources in determining management actions.

3.5.2 Assume responsibility for the administration of CBOP and evaluate or investigate CBOP concerns.

3.6 PBNP Security Supervisor

The PBNP Security Supervisor shall determine whether CBOP concerns impact unescorted access authorization to PBNP.

4.0 PROCEDURE

4.1 Workplace Violence (Reference 5.1)

4.1.1 WE is committed to the safety and well-being of plant personnel and to maintain a work environment free from intimidation, threats and violent acts. This includes intimidating, threats or hostile behaviors, physical abuse, vandalism, arson, sabotage or other similar acts which are inappropriate in the workplace.

a. Individuals must be observant of improper conduct and take necessary steps to reduce the conduct's impact upon the workplace.

b. Individuals who feel they have been the victim of any inappropriate acts or behaviors should immediately report the incident to their WE supervisor.

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- c. Individuals who have knowledge of any workplace violence should immediately report the incident to their WE supervisor.
- d. WE management/supervisory personnel will investigate complaints and based upon the results of the investigation, take appropriate action.

- 4.1.2 Occasionally incidents occur which bring into question an individuals trustworthiness or reliability.

The incident is of such a significant and critical nature that it requires immediate action and may have an impact on the individuals unescorted access to PBNP.

The act shall be considered critical and shall be reported to WE management/supervisory personnel. Such acts may include:

- a. Deliberately injuring another worker;
- b. Committing theft of company property;
- c. Intentionally mistreating equipment.

- 4.1.3 When potential violent situations are recognized:

- a. Management shall investigate the situation;

Based on the results of the investigation, supervision either:

- Resolves the situation utilizing supervision interventions (e.g., counseling, discipline, EAP, or other resources), or
- Activates the Risk Assessment Team by contacting the Administrator of Medical Services or Corporate Security.

- b. Supervision shall document the complaint, actions and disposition.

- 4.1.4 When a crisis situation is recognized:

- a. Employees shall take actions necessary to ensure personal safety is of the utmost priority.
- b. Supervision shall contact the administrator of Medical Services or Corporate Security to activate the risk assessment team.
- c. Management can contact law enforcement if needed.

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- d. Any employee is empowered to contact local law enforcement in an emergency situation.

4.1.5 During a post crisis situation:

Supervision shall notify the next higher level of management.

- Risk Assessment Team to coordinate an incident debriefing.
- External Affairs Department for media inquiries.

4.1.6 In certain situations it may be necessary to:

- Ensure that an employee does not have access to a weapon with which to carry out a stated or implied threat, or
- Determine if the employee was prepared to carry out the threat.

For this purpose, and to ensure the safety of the Risk Assessment Team and the victim/complainant, an inspection may be required to determine whether the employee has violated prohibition, with respect to weapons in the workplace. Accordingly, the following rules govern such inspections.

- a. Employee, their vehicle and personal property, including but not limited to, tool boxes, gym bags, back packs, lunch boxes, briefcases, and purses are permitted on company property based on the condition they are subject to inspection.
- Inspections could be done by supervision, security, or designee.
 - This could include the use of trained dogs.
- b. An employee who refuses to immediately submit to such an inspection of his/her vehicle or other property, shall be considered insubordinate and subject to disciplinary action, up to and including discharge.
- c. Company property such as lockers, desks, and tool boxes assigned or issued to employees in conjunction with their employment, are also subject to inspection.

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- d. It is mandatory that employees also comply with all local, state and federal laws regarding weapons.
 - If it is suspected that an employee is in violation of laws regarding weapons, supervision should immediately contact:
 - (a) PBNP Security, or
 - (b) Corporate Security.
- e. Any concealed weapon discovered may be seized and turned over to law enforcement authorities.
- f. If the individual subject to the search is a member of a represented group, the individual may request the presence of a union steward as a witness.
 - If a steward is not immediately available, another union member should be substituted.
 - Management has the responsibility to set up a steward if discipline could come out of it.

4.2 Evaluation Of Hearsay Or Anonymous Allegations

The credibility of an allegation must first be established. The responsible supervisors are accountable for assessing whether the information received is credible or not. If the allegation is credible, the affected individual shall be investigated by the PBNP FFD Administrator.

- 4.2.1 The supervisor should take two key factors into consideration when determining the credibility of an allegation.
 - a. If allegations contain detailed information, they are generally considered more credible than a single, general statement (i.e., John Doe was seen at 11:30 today in Joe's Bar drinking before work versus John Doe drinks before work).
 - b. A person who provides his/her name when reporting an allegation adds credibility to an allegation.
- 4.2.2 Interview the subject of the allegation to ascertain whether or not the allegation is credible.

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- 4.2.3 Every effort should be made to protect the confidentiality of the person(s) the allegation is directed towards.
- a. All information shall be given to the individual(s) involved and **NOT** in a group setting. (Reference B-1)
 - b. Should the allegation involve the use of drugs or alcohol, refer to the Fitness For Duty procedure to determine "for cause testing." (Reference 5.2) (See Attachment A)
- 4.2.4 If you receive the allegation directly concerning an individual, follow the guidance above. In all cases, document receipt of any allegation and actions taken in response to the allegation. Send a confidential copy to the PBNP Security Supervisor.
- 4.3 Administrative Hold
- 4.3.1 There are occasions when it is appropriate for WE management/supervisory personnel to request that an individual's unescorted access (picture badge) be temporarily withheld for administrative reasons and could include:
- a. Investigation of a critical incident;
 - b. Performance, CBOP or FFD concerns;
 - c. Expiration of General Employee Training requirements;
 - d. Not maintaining unescorted access authorization requirements.
- 4.3.2 Management/supervisory personnel are to contact PBNP security for all requests to place an individual's unescorted access on administrative hold.
- a. WE PBNP security representatives will evaluate/investigate the appropriateness of interrupting an individual's unescorted access in accordance with regulatory requirements.
 - b. WE PBNP security representatives shall be contacted for removal of an individual's unescorted access from administrative hold.
 - c. WE management shall schedule a return meeting with individuals to ensure appropriate follow-on actions are understood, to include any rehabilitation requirements or company "Last Chance Agreements." (Reference B-2)

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4.4 Addressing Aberrant Behavior

4.4.1 Any supervisor, escort or co-worker who receives a report of aberrant behavior, i.e., when a person's conduct raises concern which could affect safety or fitness for duty, shall promptly notify their supervisor.

4.4.2 The supervisor advised of the situation by the observing/reporting person or, if available, the supervisor of the worker of concern, shall discuss the matter in confidence with the reporting individual and, if possible, personally observe the worker of concern.

a. That supervisor determines if the situation/circumstances necessitate action and shall take necessary steps to ensure continued protection of the plant and personnel.

Actions to be taken include:

- Notifying their WE supervisor and PBNP security of concerns.
- Relieving an individual from duty and escorting him or her out of the protected area;
- Arranging a "for cause" alcohol and drug test. (Reference 5.2)
- Evaluate the need for an alcohol and drug assessment (AODA), medical or psychological evaluation.
 - (a) The PBNP FFD Administrator shall schedule and coordinate assessments or evaluations as needed.
 - (b) The decision to proceed with an assessment or evaluation shall be approved by the PBNP Plant Manager or Site Vice-President, PBNP.

b. Some factors that can affect a worker's ability to perform their job can include:

- Injury or illness.
- Unresolved emotional problems.
- Poor diet or lack of sleep and proper rest.

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4.5 Supervisory Intervention/Employee Assistance Program (EAP)

The time for management/supervisory personnel to act within the CBOP on your observations is before problems within the workplace occur.

NOTE: When employees contact the EAP directly, supervisors are not aware of the call and are not involved in the counseling process.

4.5.1 Encourage personnel who exhibit abnormal behavior to voluntarily seek assistance through their Employee Assistance Program (EAP).

Suggesting a voluntary self-referral to EAP could help prevent continuing deterioration of an individual's performance.

4.5.2 A referral to the Company's EAP by a supervisor is warranted when it appears that a deterioration in employee performance has shown a pattern of decline.

a. The EAP can be particularly valuable in assisting the employee to address personal problems that may be contributing to the decline in work performance.

b. The supervisor referral is not a disciplinary measure, nor does it replace standard policies and procedures for dealing with poor work performance.

c. Refer to the company's EAP handbook for additional information or contact the PBNP FFD Administrator for guidance.

4.5.3 If at anytime an individual admits to having a problem, which may include alcohol or drug abuse and the individual requests professional assistance, they shall be immediately referred to EAP.

a. Participation in EAP will neither cause nor prevent disciplinary action for violation of company policies, violations of the PBNP FFD Program, nor relieve them of their responsibility to perform work in a satisfactory manner.

b. The PBNP FFD Administrator shall be advised by the supervisor of all alcohol or drug abuse problems.

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4.6 CBOP Documentation/Records

- 4.6.1 Records in support of CBOP are maintained separate from employee performance records.
- a. Observations of aberrant behavior or other unacceptable conduct shall be documented.
 - b. Significant variances/changes in conduct, behavior and performance shall be documented. It is appropriate to document these observations on a CBOP Checklist. (Reference 5.3)
 - CBOP Checklists or other written documentation shall be maintained in a separate file from employee personnel records.
 - The FFD Administrator review of CBOP Checklists may be warranted when an individual's continued unescorted access to PBNP may be in question.
 - c. Action to interrupt an individual's unescorted access or referral to the EAP shall be documented.
- 4.6.2 If no behavioral changes potentially impacting trustworthiness or reliability are observed, no documentation of an individual's behavior is required.
- 4.6.3 CBOP records are confidential and can only be disclosed to individuals who have a "need to know." Individuals in that category may include managers/supervisors; administrators in security, access authorization and FFD; EAP professionals, psychologists/psychiatrists, and Medical Review Officers; clerical/administrative assistants; and auditors/inspectors performing required duties.

4.7 Training (FFD Level 1, 2, and 3)

Fitness For Duty awareness Level 1, Level 2, and Level 3 training for escorts is provided to all personnel. This training is included as part of an individual's General Access Training (GAT).

- 4.7.1 All personnel assigned unescorted access are provided FFD Level 1 training to ensure they understand:
- a. PBNP FFD policy and procedures, including the methods that will be used to implement the policy.
 - b. The personal and public health and safety hazards associated with abuse of drugs and misuse of alcohol.

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- c. The effect of prescription, over-the-counter drugs, dietary conditions on job performance, chemical test results, and the role of the Medical Review Officer.
 - d. Employee Assistance Programs provided by PBNP.
 - e. What is expected of individuals with unescorted access and what consequences may result from lack of adherence to the PBNP FFD policy.
- 4.7.2 All personnel assigned unescorted access, which allows that person to perform escort duties, are provided appropriate FFD Level 2 training in:
 - a. Techniques for recognizing drugs and indications of the use, sale, or possession of drugs.
 - b. Techniques for recognizing aberrant behavior.
 - c. The procedures for reporting problems to supervisory or security personnel.
 - d. FFD Level 1 and 2 training must be completed prior to authorization of unescorted access and assignment of duties.
- 4.7.3 All personnel are provided FFD Level 3 training in:
 - a. Their role and responsibilities in implementing the FFD program.
 - b. The roles and responsibilities of others, such as the medical and EAP staff.
 - c. Behavioral observation techniques for detecting degradation in performance, impairment, or changes in employee behavior.
 - d. Procedures for initiating appropriate corrective action, to include referral to the employee assistance program.
- 4.7.4 Fitness For Duty Level 1, 2, and 3 refresher training must be completed on a nominal 12 month frequency, or more frequently, where the need is indicated.
- 4.7.5 Training records shall be maintained for a three year period. These records are maintained by the PBNP training department.

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5.0 REFERENCES

- 5.1 WE Energies Workplace Violence Procedure
- 5.2 NP 1.7.5, Fitness For Duty Policy And Procedure
- 5.3 PBF-0110, CBOP Job Performance Checklist
- 5.4 PBF-6401, Training Attendance Report
- 5.5 NP 1.7.2, Regulatory Access Authorization Requirements
- 5.6 NEI 95-01, Nuclear Power Plant Personnel Access Authorization Standards And Procedures
- 5.7 NP 1.7.12, Access Authorization - Reporting Arrests
- 5.8 WE Energies Policy Regarding Alcohol And Other Drug Use, Policy No. 147
- 5.9 Regulatory Guide 5.66, Access Authorization Program For Nuclear Plants
- 5.10 10 CFR 73.56, Personnel Access Authorization Requirements for Nuclear Power Plants
- 5.11 PBNP Security Guidelines 3.2, Badges On Administrative Hold
- 5.12 10 CFR 26.22, Fitness-For-Duty Programs

6.0 BASES

- B-1 ECP 98-13 Action #5, Employee Concern Program
- B-2 SP 99-007, Develop return to work meeting

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ATTACHMENT A
SYMPTOMS FOR DRUG USE

DRUG USED	PHYSICAL SYMPTOMS	LOOK FOR	DANGERS
ALCOHOL (beer, wine, liquor)	Intoxication, slurred speech, unsteady walk, relaxation, relaxed inhibitions, impaired coordination, slowed reflexes.	Smell of alcohol on clothes or breath, intoxicated behavior, hangover, glazed eyes.	Addiction, accidents as result of impaired ability and judgement, overdose when mixed with other depressants, heart and liver damage.
COCAINE (coke, rock, crack, base)	Brief intense euphoria, elevated blood pressure and heart rate, restlessness, excitement, feeling of well-being followed by depression.	Glass vials, glass pipe, white crystalline powder, razor blades, syringes, needle marks.	Addiction, heart attack, seizures, lung damage, severe depression, paranoia. (See Stimulants)
MARIJUANA (pot, dope, grass, weed, herb, hash, joint)	Altered perceptions, reduced concentration/coordination, red eyes, dry mouth, euphoria, laughing, hunger.	Rolling papers, pipes, dried plant material, odor of burnt hemp rope, roach clips.	Panic reaction, impaired short term memory, addiction.
HALLUCINOGENS (acid, LSD, PCP, MDMA, Ecstasy, psilocybin, mushrooms, peyote)	Altered mood and perceptions, focus on detail, anxiety, panic, nausea, synaesthesia (ex: smell colors, see sounds)	Capsules, tablets, "microdots," blotter squares.	Unpredictable behavior, emotional instability, violent behavior (with PCP).
INHALANTS (gas, aerosols, glue, nitrites, Rush, White out)	Nausea, dizziness, headaches, lack of coordination and control.	Odor of substance on clothing and breath, intoxication, drowsiness, poor muscular control.	Unconsciousness, suffocation, nausea and vomiting, damage to brain and central nervous system, sudden death.
NARCOTICS Heroin (junk, dope, Black tar, China white), Demerol, Dilaudid (D's), Morphine, Codeine	Euphoria, drowsiness, insensitivity to pain, nausea, vomiting, watery eyes, runny nose (see Depressants)	Needle marks on arms, needles, syringes, spoons, pinpoint pupil, cold moist skin.	Addiction, lethargy, weight loss, contamination from unsterile needles (hepatitis, AIDS), accidental overdose.
STIMULANTS (speed, uppers, crank, Bam, black beauties, crystal, dexies, caffeine, nicotine, cocaine, amphetamines)	Alertness, talkativeness, wakefulness, increased blood pressure, loss of appetite, mood elevation.	Pill and capsules, loss of sleep and appetite, irritability or anxiety, weight loss, hyperactivity.	Fatigue leading to exhaustion, addiction, paranoia, depression, confusion, possible hallucinations.
DEPRESSANTS Barbiturates, Sedatives, Tranquilizers, (downers, tranks, ludes, rebs, Valium, yellow jackets, alcohol)	Depressed breathing and heartbeat, intoxication, drowsiness, uncoordinated movements.	Capsules and pills, confused behavior, longer periods of sleep, slurred speech.	Possible overdose, especially in combination with alcohol; muscle rigidity; addiction, withdrawal and overdose require medical treatment.