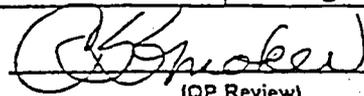
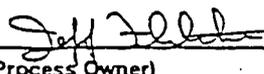
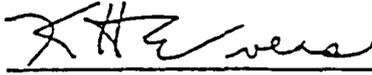


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1.0 Purpose

- 1.1 This directive provides guidance for implementing the Nuclear Organization's policy on drug and alcohol use.
- 1.2 This directive is established with the goal of maintaining a work environment that is free from the effects of drug and alcohol abuse and establish the framework to meet the requirements of 10CFR26.

2.0 Applicability

- 2.1 This directive applies to all persons who have applied for or have been granted unescorted access to KNPP or who would report to the WPSC Emergency Operations Facility as a designated member of the Emergency Response Organization.
- 2.2 Vendors or contractors who have a Fitness for Duty Program which meets 10CFR26 and has been approved by WPSC may not be subject to this directive.
- 2.3 NRC employees, law enforcement personnel, and off-site fire and medical personnel are exempt from this directive while responding on site.
- 2.4 For those WPSC employees covered under 10CFR26, this FFD Program takes precedence over any differences from the WPSC Corporate Fitness for Duty Program.

3.0 Definitions

- 3.1 Illegal Drugs - Those drugs included in Schedules I through V of the Controlled Substances Act (CSA), but not when used pursuant to a valid prescription or authorized by law.
- 3.2 Alcohol - Includes products manufactured or marketed as beverages which contain any quantity of alcohol (i.e., "non-alcoholic" beer).

4.0 Responsibilities

- 4.1 The Nuclear Organization has overall responsibilities for the Nuclear Fitness for Duty Policy and Procedures.

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4.2 The Nuclear Security Director or his designee (hereafter called Security Director) is responsible for:

- 4.2.1 Administrating the KNPP specific FFD Program elements.
- 4.2.2 Performing appropriate review, revision, and implementation of all FFD procedures.
- 4.2.3 Collecting, organizing, and preparing the data required by 10CFR26.71.
- 4.2.4 Ensuring that the testing laboratory reports a monthly statistical summary of test results in accordance with 10CFR26 Appendix A subpart B.2.7(g)(6).
- 4.2.5 Granting access to KNPP and selection and testing of personnel to maintain unescorted access.
- 4.2.6 Interfacing with the local law enforcement agencies where applicable.
- 4.2.7 Reviewing collection site, testing laboratory, and MRO performance.
- 4.2.8 Reviewing changes made to all FFD procedures, policies, and practices.
- 4.2.9 Reviewing all adverse test results involving WPS employees and applicants.

4.3 All persons who fall under the applicability statement above are responsible for maintaining an alcohol and drug-free work environment by adhering to the requirements of this directive.

4.4 All personnel allowed unescorted access to KNPP or who respond to the EOF for a declared emergency are responsible to report to work in a condition fit for duty: free from the influence of any substance, legal or illegal, or mentally or physically impaired from any cause, which in any way adversely affects their ability to safely and competently perform their duties.

5.0 Requirements

- 5.1 No individual shall be allowed to consume alcohol while on the job.
- 5.2 Consuming alcoholic beverages within an abstinence period of 5 hours preceding the start of scheduled work is prohibited. The requirements pertaining to alcohol consumption in conjunction with unscheduled (call-in) work are described in GNP-01.04.03.
- 5.3 The use of the alcohol or abuse of legal drugs within the protected area will result in immediate revocation of access to protected areas and possible discharge from nuclear power plant activities.
- 5.4 Alcoholic and illegal drug substances are prohibited from inside the Plant Protected Area and shall not be transported on Company automotive equipment.

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- 5.5 The use, distribution, or possession of illegal drugs while on the job or on Company property is prohibited.
- 5.6 The sale, use, or possession of illegal drugs within the protected area of the Kewaunee Nuclear Power Plant will result in immediate revocation of access to protected areas and discharge from nuclear power plant activities.
- 5.7 Any other sale, use, or possession of illegal drugs will result in immediate revocation of access to protected areas, mandatory rehabilitation prior to reinstatement of access, and possible discharge from nuclear power plant activities.
- 5.8 Effective monitoring and testing procedures as detailed in the Kewaunee General Nuclear Procedures will be implemented to provide reasonable assurance that personnel with access to KNPP, or who are required to report to the Emergency Operations Facility, are fit for duty. Refer to Section 7.0 of this directive.
- 5.9 The appropriate Local Law Enforcement Agency (LLEA) shall be notified if illegal drugs, or substances suspected of being illegal, are found on Company property.
- 5.10 The use of legal controlled substances prescribed by a licensed physician is not prohibited, but persons undergoing treatment are advised to report such treatment to their supervisor.
- 5.11 It is the responsibility of every employee to report to supervision incidents where a fellow employee may endanger the safety of himself or others, harm customer service or relations, or damage property or equipment of the Company, customer, or the general public.
- 5.12 Individuals who are found to be in violation of these requirements will be subject to disciplinary actions up to and including discharge.
- 5.13 Any WPSC employee, who desires assistance in dealing with drugs, alcohol, or any other problems that affect their ability to safely perform their duties, may receive help by contacting the company-designated Employee Assistance Program (EAP) provider. Additional information concerning EAP is contained in GNP-01.04.07.
- 5.14 Any person arriving on site and requesting access to the Plant who appears under the influence of alcohol or drugs shall be denied access to the Plant.
- 5.15 Plant Supervision shall be notified and determine if the person is fit for duty and if access should be granted.
- 5.16 NRC Personnel believed to be unfit for duty are not to be denied access in accordance with 10CFR26.27(d). The individual shall be escorted and any such instance shall be reported to the NRC regional administrator during normal working hours or the NRC operations center during off-work hours.

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5.17 Personnel assigned to activities within the scope of 10CFR26 shall be provided with appropriate training in accordance with 10CFR26.21 and 26.22. Initial training must be completed prior to assignment of activities. Refresher training must be completed on a nominal 12 month frequency or more frequently where the need is indicated. A record of the training must be retained for a period of at least three years.

6.0 References

6.1 10CFR26, Fitness for Duty Program

7.0 Implementing Procedures

7.1 The detailed procedures to implement the KNPP Fitness for Duty Program are contained in the General Nuclear Procedures as follows:

- 7.1.1 GNP-01.04.01, Random Personnel Selection Procedure
- 7.1.2 GNP-01.04.02, Specimen Collection Procedure
- 7.1.3 GNP-01.04.03, Alcohol Testing Program
- 7.1.4 GNP-01.04.04, Behavioral Observed Just Cause Testing
- 7.1.5 GNP-01.04.05, Fitness for Duty Test Results
- 7.1.6 GNP-01.04.06, Fitness for Duty Quality Assurance Program
- 7.1.7 GNP-01.04.07, Employee Assistance Program
- 7.1.8 GNP-01.04.08, Fitness for Duty Performance Data Report
- 7.1.9 GNP-01.04.09, Fitness for Duty Records

8.0 Records

8.1. The following QA records and non-QA records are identified in this directive/procedure and are listed on the KNPP Records Retention Schedule. These records shall be maintained according to the KNPP Records Management Program.

8.1.1 QA Records

None

8.1.2 Non-QA Records

None