

## Access Authorization & Fitness For Duty

### KNPP's FITNESS FOR DUTY POLICY

KNPP's fitness-for-duty policy states that you shall:

- Report to work fit for duty unimpaired from any cause (alcohol, drugs, physical illness, mental illness, fatigue, etc.)
- Abstain from alcohol for at least five hours preceding scheduled work or longer if necessary to ensure blood alcohol content is less than 0.04 percent.
  - Persons called-in for duty outside the regularly scheduled work day (unscheduled work) shall be fit for duty and shall have a blood alcohol content of less than 0.04% although alcohol consumption may have occurred within a five-hour period immediately preceding arrival on-site for a call-in.
  - If called in, for unscheduled work, and you have ingested alcohol within the 5-hour period, advise the caller/supervisor as to the nature, extent and time of the ingestion. If you feel you are not impaired, you may report to work. An alcohol pre-screening test or a personal assessment by a responsible supervisor shall be performed prior to entry into the Protected Area to determine the person's fitness for duty. If you feel you are impaired, do not report to work and so advise your supervisor. No penalty or discipline will be assessed in this case.
- Abstain from alcohol during the work shift. This includes lunch and break periods regardless if the consumption takes place on or off-site.
- Notify your supervisor of any problems such as mental stress, fatigue, or illness that may affect your fitness for duty.
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- Report to your supervisor the legitimate use of prescription or over-the-counter drugs that may adversely affect your performance.
- Prevent and report actions that threaten the company or coworkers (includes reporting personnel with symptoms of substance abuse).
- Report any previous denial of unescorted access, positive chemical test, or involuntary participation in a substance abuse treatment program.
- Cooperate fully with the chemical testing program.
- Do not use, sell, distribute, or possess illegal substances on or off company property.

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### IF IN VIOLATION:

- The sale, use, or possession of illegal drugs within the protected area of the KNPP will result in immediate revocation of access to Protected Areas and discharge from nuclear power plant activities.
- 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.
- The use of alcohol or the 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.

NOTE: The use of legal controlled substances prescribed by a licensed physician is not prohibited.

- Individuals who are found to be in violation of these requirements will be subject to disciplinary actions up to and including discharge.
- The appropriate local law enforcement agency shall be notified if illegal drugs, or substances suspected of being illegal, are found on company property.

### IMPLEMENTATION OF THE AA and FFD PROGRAMS

The primary parts of the plant's AA and FFD programs are:

- chemical testing
- behavior observation by escorts, managers and supervisors
- training
- employee assistance program

### CHEMICAL TESTING

Chemical testing provides a means to detect and deter substance abuse in the workplace.

There are four test categories in chemical testing:

- Pre-access/Pre-badging testing is conducted within 60 days prior to:
  - granting of unescorted access to the Protected Area
  - assignment to any emergency operation facility or technical support center duties.
- Random testing will be conducted:
  - at various unannounced times during the day, night, weekend, and holidays
  - at an annual rate at least equal to 50 percent of the work force authorized for unescorted access

Since it is random, some employees may be tested more than once in a year and some not at all.

- For-cause testing will be conducted:
  - as soon as possible following any observed behavior if there is reasonable suspicion that the person was under the influence of drugs or alcohol.
  - after on-duty accidents or potential accidents involving failure or suspected failure of an individual's performance if there is reason to believe the person was under the influence of drugs or alcohol.
  - after receiving credible information that an individual is abusing drugs or alcohol.

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- Follow-up testing will be conducted:
  - for any employee, if reinstated, after testing positive for drugs or alcohol to verify continued abstention from the use of substances.

### TESTING NOTIFICATION

When you are selected for a random test, you will be notified by gai-tronics page, telephone call, or through your supervisor. The caller or supervisor will inform you of the scheduled test time

When an individual has been notified that he/she has been scheduled for a random test, the individual must report at the scheduled time. You may not request time off once notified of the test. Failure to report promptly may result in disciplinary action.

### SUBSTANCES TESTED FOR

Individuals will be tested for the following substances:

- alcohol
- marijuana
- cocaine
- opiates
- phencyclidine
- amphetamines

Urinalysis will be used for all substances except alcohol. A breath alcohol content test (Breathalyzer) will be used for alcohol, and a confirmatory breath alcohol content test will be used if the test result is 0.04 percent or greater.

If an individual's breath alcohol content test is positive, he/she may request a blood test.

Individuals should be aware that certain prescription and over-the-counter medication could cause a positive test result. You should be aware of your medications and keep your supervisor informed as part of the fitness-for-duty program. You must also list on your drug screening consent forms all the prescription and over-the-counter medication taken in the past 30 days. All drugs onsite should be in a properly labeled container. Nonprescription drugs onsite should be in their original container.

### MEDICAL REVIEW OFFICER (MRO)

The company makes every effort to ensure that test analyses are accurate and that all possible causes for positive tests are explored prior to confirming a positive test. The medical review officer will review, interpret, and confirm all positive test results. Additionally, the MRO may recommend individuals to the employee assistance program.

### EMPLOYEE ASSISTANCE PROGRAM

The company has an employee assistance program (EAP) to provide assessment, referral services, short-term counseling, and treatment monitoring.

Company employees may request assistance from the EAP (self-referral) or can be referred by their supervisor or by the MRO.

If the EAP staff determines that your condition constitutes a hazard to yourself or to others, 10 CFR 26 requires notification of company management even if the employee is self-referred.

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For NMC employees, employee assistance is provided by EMAX and can be reached at 1-800-227-3429. For WPSC employees, employee assistance is provided by ERC and can be reached locally at 430-7600 or toll free at 1-800-222-8590.

### INDIVIDUAL RIGHTS and RESPONSIBILITIES

You have the right to privacy at the collection site unless there is reason to believe that you will tamper, alter, or substitute a specimen.

Personal information collected for the AA and FFD program will be protected and will not be disclosed except as required by the appropriate procedure.

If you test positive, you have the right to appeal the test results and any sanctions taken against you. Appeals for a confirmed positive test:

- Apply to licensee employees and contractors
- Must be submitted in writing to the KNPP Plant Manager

Each individual is responsible for:

- Keeping their supervisor informed of any medication or other substances that could affect safe and competent job performance.
- Reporting to their supervisor any unusual behavior or suspected substance abuse by any other worker. Prompt action is required since there is a potential for injuries or reduced plant performance.
- Reporting all arrests, charges, and convictions to your NMC supervisor/liaison. Reporting shall be made prior to the worker's next shift or within 24 hours or the worker receiving notice, whichever is shorter. Failure to report such information may result in the revocation of unescorted access authorization. The NMC supervisor/liaison is responsible to then report the arrest, charge, or conviction to the Site Access Authorization Lead (SAAL).

## ESCORT DUTY LEVEL

Escorts and supervisors must be sensitive to individual performance for indications of aberrant behavior that affect the ability to complete assigned tasks. An escort is responsible for observing the people he/she is escorting. Supervisors and managers have contact and interact with a number of people throughout the plant. In these interactions and short-term management of team efforts, supervisors must be sensitive to indications of aberrant behavior.

Escorts or supervisors must take timely action to prevent a situation that could affect the reliability of the plant. Delaying action to diagnose the cause of impairment is not required or desired.

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### RECOGNIZING ABERRANT BEHAVIOR

Impairment may come from several sources, which are frequently seen in similar types of behavior manifestations:

- alcohol consumption
- drug use
- psychological problems
- physical limitations

There are general indicators of degraded behavior that must be watched for:

- Physical signs, such as stumbling, lack of coordination, or falling asleep.
- Appearance, such as red eyes, smell of alcohol, or sweating.
- Attitude, such as threatening statements or combative.

### RECOGNIZING DRUG USE, SALE and DISTRIBUTION

Everyone is aware that employees under the influence of drugs or alcohol almost invariably produce inferior work, call in sick a lot, and threaten the safety of coworkers and customers. It's important that plant personnel be able to recognize the signs of drug and alcohol abuse and know what to do if they suspect a coworker is abusing drugs or alcohol. The following are some physical symptoms and behaviors caused by the most widely used controlled substances and alcohol.

#### Controlled Substances: Identification and Recognition of Symptoms and Behaviors

Controlled Substance	Appearance	How is it used?	Symptoms of use	Withdrawal symptoms
Beer, wine, Hard Liquors	Liquid consumed as a beverage.	Ingested	Relaxation, lowered inhibitions, reduced intensity of physical sensations, digestive upsets, reduced muscular coordination.	Convulsions, hallucinations, loss of memory, uncontrolled muscle spasms, psychosis.

Controlled Substance	Appearance	How is it used?	Symptoms of use	Withdrawal symptoms
1. Marijuana	Resembles coarsely ground oregano.	Smoked or taken orally (ingested in foods, such as brownies, cakes, or brewed into a "tea")	Euphoria, relaxed inhibitions, increased appetite, disoriented behavior.	Insomnia, hyperactivity and decreased activity.
2. Hashish	Dark brown resin pressed into cakes or balls.			
3. Hashish Oil	Syrupy dark brown liquid.			

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Controlled Substance	Appearance	How is it used?	Symptoms of use	Withdrawal symptoms
1. Cocaine <sup>1</sup>	White crystalline powder	Smoked or eaten	Extreme and uncommon excitability, rapid bizarre behavior, anxiety, uncontrolled talkativeness, dilated pupils, difficulty in focusing, sniffles or runny nose, teeth grinding, paranoia, sleeplessness, and/or chronic fatigue.	Apathy, long periods of sleep, irritability, depression, disorientation.
2. Crack cocaine	Tiny chips having the appearance of slivers of soap with the pure look of porcelain or small chunks of plaster.	Smoked		
3. Amphetamines <sup>2</sup>	Pills and capsules of varying shapes, sizes, and colored powders.	Taken orally and injected		

<sup>1</sup>Designated as a narcotic under the Controlled Substances Act.

<sup>2</sup>Amphetamines can be used in the treatment of hyperactivity, attention deficient disorder in children, mild depression and as an appetite suppressant for weight control.

Controlled Substance	Appearance	How is it used?	Symptoms of use	Withdrawal symptoms
1. Opium	Dark brown chunks and powder.	Smoked or eaten	Constricted pupils, droopy eyelids, low raspy voice, fresh injection wounds, depressed reflexes, poor coordination, short-lived state of euphoria, drowsiness.	Watery eyes, runny nose, sneezing, yawning, loss of appetite, restlessness, irritability, tremors, panic chills and sweating, stomach cramps, nausea.
2. Codeine	Dark liquid varying in thickness, and capsules and tablets.	Taken orally or injected		
3. Heroin	Powder, white to dark brown and tar-like substance.	Injected, sniffed, or smoked		

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Controlled Substance	Appearance	How is it used?	Symptoms of use	Withdrawal symptoms
1. Phencyclidine (PCP or angel dust)	White crystalline powder. Yellowish liquid.	Taken orally, injected, smoked by adding liquid PCP to cigarettes	Drowsiness, blank stare, poor coordination, violent combative behavior	Depression, poor memory, confusion, headaches, flashbacks, increased need for sleep.
2. LSD	Tablets, clear liquid, thin squares of gelatin or on small pieces of paper.	Taken orally, eaten, or licked off paper	Slurred speech, anxiety, restlessness, loss of appetite, blank stare.	Withdrawal symptoms not reported.

Controlled Substance	Appearance	How is it used?	Symptoms of use	Withdrawal symptoms
1. Barbiturates <sup>3</sup>	Pills or capsules in varying shapes, sizes and colors: red, yellow, blue, or red and blue.	Taken orally	Slurred speech, drowsiness, disorientation, confusion, drunken behavior without the odor of alcohol.	Anxiety, restlessness, loss of appetite, trembling, convulsions, possible death.
2. Benzodiazepines <sup>4</sup> (tranquilizers, Librium, Valium, etc.)				

<sup>3</sup>Barbiturates: used to induced sedation and sleep.

<sup>4</sup>Benzodiazepines: anti-anxiety tranquilizers

### REPORTING POTENTIAL PROBLEMS

When a behavioral problem is detected immediate reporting to a supervisor is required. Your primary responsibility is to preclude actions that could be detrimental to plant safety.

- When an individual observes or suspects that an employee is "unfit for duty", he/she should report the observations/suspicions to his/her supervisor. If this employee could pose a threat to himself/herself, co-workers, or plant equipment, immediately report this to the Security Shift Captain.

When you observe or suspect the use, sale, or possession of illegal drugs or alcoholic beverages by any worker on the job, the following actions should be taken:

- Immediately notify your supervisor. The supervisor should then immediately get the Security Shift Captain involved.

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## **MANAGER/SUPERVISOR LEVEL**

The company recognizes that a wide range of behavioral problems can have a negative effect on job performance and behavior. Research indicates that in some instances, the individual will overcome personal problems independently and the effect on behavior and job performance will be negligible. In other instances, only through the supervisor's assistance in getting professional help can behavioral problems be resolved.

The company has established a program to help deal with personal problems ranging from family, marital, financial, legal, and alcohol and drug abuse. The company's Employee Assistance Program (EAP) has counselors who offer confidential problem assessment, basic counseling, and referrals to other specialists. Supervisors and managers must feel comfortable calling on the EAP counselors to help employees overcome their problems.

The role of the manager/supervisor is based on the normal responsibility for the ongoing supervision and monitoring of assigned employees. Through this monitoring the manager/supervisor is able to identify the declining individual performance or unusual behavior. If a change takes place, closer observation for trends may be necessary. Supervisors do not "diagnose" an employee's personal problems or behavioral changes. Rather, the supervisor should alert those who can assist in problem resolution.

Experience continues to show that a strong motivational tool is the desire of an employee to retain his or her job. Thus, the supervisor becomes the key to an effective early detection and intervention program. The key is to extend an offer to help, and then motivate the individual to accept help.

### **MANAGER/SUPERVISOR**

Managers and supervisors are in day-to-day contact with their personnel and are most familiar with their normal behavior patterns. Therefore, they are in the best position to detect changes in employee's behavior and to indicate appropriate corrective action.

The company, in dealing with all behavior problems as they affect job performance of employees, will emphasize three areas of action:

- problem identification
- personnel counseling
- personnel referral

The responsibility to initiate action lies with the manager or supervisor. One purpose of the procedure is early identification and rehabilitation. It is intended to help employees resolve their problems (e.g., alcohol and/or drug dependencies), and to help restore their performance to the proper level of effectiveness.

The following guidelines are for use by supervisors at all levels throughout the utility.

- If there are fitness-for-duty issues, recommend or direct that the employee use the Employee Assistance Program.
- If behavioral issues are becoming a concern, discuss these issues with the affected employee to make him/her aware of the potential safety significance of the issues.
- Continue to observe the employee's behavior to see if the required improvement is occurring. Document the trends in the employee's behavior, either positive or negative.

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- Solicit a second opinion on the significance of the employee's behavior from another company supervisor.
- Inform the Security Director of the situation so he can make the determination whether to allow the employee's continued unescorted access.

### BEHAVIOR OBSERVATION

There are general behavioral observation techniques that will assist the supervisor in identifying personnel who might develop problems that could ultimately impact their trustworthiness or reliability and, in the worst case, potentially affect the safe operation of the plant.

Most people behave in a consistent manner. Changes in this pattern can signal many possible causes, including health, family, and work difficulties. Usually short lived, all of us experience such changes at one time or another. On occasion the difficulties continue and even intensify. The specific behavior change by itself may not have any significant meaning; however, you as a supervisor should document any continued ongoing employee job performance deterioration and take action when appropriate.

Troubled individuals may reflect their personal problems in the workplace and/or generate interpersonal problems with fellow employees. Worksite intervention can be one of the most effective ways co-workers and supervisors can assist employees in acquiring help.

The Behavior Observation Checklist and Quick Reference Guide (found later in this section) are provided as tools for when there is a concern that an individual's behavior may be deteriorating. If the review shows a problem, documentation and follow-up should be done according to company procedure.

Pursuant to the overall goal of ensuring safe nuclear operations and personnel safety, intervention with problem workers may be necessary. In addition to keeping the workplace safe, it is one of the most effective ways to assist an employee that may be experiencing an ongoing personal crisis. Intervention may avoid the individual's loss to the company by taking corrective action before events go too far.

When continued or repetitive patterns of job performance deterioration begin to appear, documentation is appropriate. The following indicators may also be indicative of a potential fitness-for-duty problem.

- Performance
  - Mistakes due to poor judgement.
  - Blaming others or making excuses for poor job performance.
  - Deterioration of ability to make sound decisions
  - Wasting resources and materials
  - Spasmodic work patterns
  - Loss of motivation or enthusiasm for the job
- Absenteeism and Abuse of Time-off
  - Monday absences, Friday absences, or day after holiday absences
  - Repeated tardiness
  - Repeated absences of a few days or more

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- Personal Behavior
  - Frequent temper loss
  - Over-reaction to real or imagined criticisms
  - Objects over doing work that should be done by "someone else"
  - Verbal denial of the existence of any job performance problem
  - Increased isolation from fellow employees
  - Unexplained memory loss
  - Can't or won't perform up to required standards or dress
  - Marked change in personal grooming and hygiene
  - Marked change in social activities or life style

### INDICATORS of CHANGE in BEHAVIOR

A supervisor's responsibility is to recognize emerging behavioral problems and to respond constructively. Potential warning signs include:

- Physical Signs or Condition:
  - Weariness, exhaustion
  - Yawning excessively
  - Sleepiness (nodding/drooping eyes)
  - Blank stare
  - Slurred speech
  - Unsteady walk
  - Sunglasses worn at inappropriate times
  - Untidiness
  - Unusual effort to cover arms
- Mood:
  - Appears to be depressed or extremely anxious all the time
  - Irritable
  - Suspicious
  - Complains about others
- Actions:
  - Withdrawn or inexplicably talkative
  - Spends excessive amount of time on the telephone
  - Argumentative
  - Has exaggerated sense of self-importance
  - Displays a potential for violent behavior
  - Avoids talking with supervisor regarding work issues

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Examples of Questions to Be Applied to Employee Behavior Patterns:

- Does the employee appear less sociable than before?
- Has the individual become too sociable?
- Are there changes in the employee's choice of friends?
- Are there changes in the way other workers react to him/her?
- Does the employee show more anger?
- Does the individual try to manipulate others?
- Does the individual display any changes in speech pattern?
- Does the employee have more complaints?
- Is the employee markedly more secretive or inquisitive?

### ADDRESSING BEHAVIOR PROBLEMS

Any observations that cause serious concern about the reliability or trustworthiness of an employee should be provided to the Security Director for potential removal of unescorted access.

When a supervisor observes or suspects that an employee may not be fit for duty, he/she should report the situation to the employee's immediate supervisor. In addition, the supervisor should:

- Request that another company supervisor or other company employee act as a witness to the circumstances.
- Relieve the employee of duty, if appropriate.
- Report the facts of the situation to the Security Director.

If the supervisor's observations/suspicions warrant for-cause testing, the employee must be asked to explain his/her apparent impaired condition. The employee should be escorted to the Security Building for testing. If the employee refuses to go, he/she should be warned unescorted access authorization will be suspended. The supervisor should not speculate about what specific action may be taken.

When a determination has been made that the employee is "unfit for duty," action must be taken to preclude unescorted access.

Following any fitness-for-duty incident, it is important that the supervisor immediately make a detailed written report of all actions, observations, statements, and other pertinent facts including date, time, location, and witnesses to the incident. A copy of this record should be delivered to the Security Director for inclusion into the files. This record should be helpful in determining the need for further action.

If a supervisor receives a report (anonymous or otherwise) that an employee has violated the company drug or alcohol policy, the supervisor should collect as much information as possible concerning the charge. Allegations of drug policy violations must be kept confidential and are to be discussed only with company management and security personnel who have a "need to know."

Follow company procedures if alcohol/drug/drug paraphernalia is/are found on company property.

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### How to Document Behavioral Problems:

- Be factual, write down the incidents of behavior problems as they happen. Be clear and concise and include date, time, and specific details.
- Be objective in recording only observed circumstances. Do not speculate or judge based upon subjective impressions or uncorroborated hearsay.
- Document any incident of aberrant behavior, i.e., any behavior that impacts reliability and trustworthiness whether on-the-job or publicly noticed off-the-job behavior.
- All documented information must be treated as confidential and handled on a "need to know" basis. It is to be discussed only with the employee, associated supervisors, and/or an employee assistance program counselor.

### EMPLOYEE ASSISTANCE PROGRAM

Corporate and regulatory policies require that employees report to work fit to perform their duties safely and efficiently. For those employees who have problems that impact their job performance, the company has an employee assistance program. Supervisors may have to intervene in a worker's activities and refer him/her to EAP.

While the company has no desire to intrude upon the employee's private life as long as his or her activities do not impact upon the individual's trustworthiness, each employee must report to work in a condition to perform required duties safely and efficiently. In the interest of their own well-being, that of their fellow workers and the public this is essential.

#### Examples of what to do:

- Do let the employee know that the company is concerned with job performance, personal reliability and trustworthiness, personal safety and the safety of the public.
- Do let the employee know that he or she should decide for himself or herself whether or not to accept assistance.
- Do emphasize that the employee assistance program is an employee benefit; that help is possible and available.
- Do realize that substance abuse is a progressive disease in which the user seldom overcomes dependency without intervention and treatment.

#### Examples of what not to do:

- Don't attempt to diagnose an employee's problem.
- Don't allow discussions that glamorize the use of drugs or abuse of alcohol.
- Don't protect the employee from the consequences of their own job-related behavior.
- Don't let sympathy-evoking tactics mislead you. Troubled employees can be very convincing that they are not at fault.
- Don't make moral judgments: direct your concerns to job performance, behavior, attendance, etc.
- Don't give an employee a misguided "break" by overlooking a problem. It could lead to a serious delay in helping the troubled employee find help.