

WISCONSIN PUBLIC SERVICE CORPORATION

KEWAUNEE NUCLEAR POWER PLANT

ADMINISTRATIVE CONTROL DIRECTIVE

NO. ACD 2.17

REV. B

TITLE: Fitness for Duty Program

DATE JAN 22 1990

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REVIEWED BY

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Department Head

REVIEWED BY

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Superintendent-Plant QC

APPROVED BY

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1.0 PURPOSE

The purpose of this Administrative Control Directive is to implement the Company's policy on drug and alcohol use. 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 10 CFR 26.

2.0 APPLICABILITY

This directive applies to all persons granted unescorted access to KNPP and to WPSC, vendor, or contractor personnel required to physically report to the Emergency Operations Facility in accordance with the Emergency Plan.

Vendors or contractors who have a Fitness For Duty Program which meets 10 CFR 26 and has been approved by WPSC may not be subject to this directive.

NRC employees, law enforcement personnel and off-site fire and medical personnel are exempt from this directive while responding on site.

3.0 DEFINITIONS

"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 when used as otherwise authorized by law.

4.0 RESPONSIBILITIES

4.1 Human Resources has overall responsibilities for WPSC Fitness for Duty Policy and Procedures.

4.2 The Vice President - Human Resources shall assign a program administrator, and one alternate, who is responsible for the activities prescribed in this directive.

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- 4.3 The program administrator is responsible to ensure that the testing laboratory reports a monthly statistical summary of test results in accordance with 10 CFR 26 Appendix A subpart B.2.7(g)(6).
- 4.4 The program administrator is responsible for collecting, organizing and preparing the data required by 10 CFR 26.71.
- 4.5 The Plant Personnel Coordinator is responsible for administration of the KNPP specific FFD program elements and the implementation of the FFD procedures.
- 4.6 The Security Director or his designee (hereafter called Security Director) is responsible for granting access to KNPP and selection and testing of personnel to maintain unescorted access.
- 4.7 The Security Director is responsible for interfacing with the local law enforcement agencies where applicable.
- 4.8 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.
- 4.9 All personnel allowed unescorted access 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 GAP 2.17.3.
- 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 Administrative 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 their Employee Assistance Coordinator. Additional information concerning EAP is contained in GAP 2.17.7.

6.D PERSONNEL ADMITTANCE

- 6.1 Any person arriving at the Plant who appears under the influence of alcohol or drugs shall be denied access to the Plant and a Plant Supervisor notified.
- 6.2 Plant Supervision shall determine if the person is fit for duty and if access should be granted.
- 6.3 NRC Personnel believed to be unfit for duty are not to be denied access in accordance with 10 CFR 26.27(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.
- 6.4 Any person with unescorted access to Kewaunee who reports to any other duty station and appears under the influence of drugs or alcohol will be reported to the KNPP Plant Manager.

7.0 FITNESS FOR DUTY PROCEDURES

The detailed procedures to implement the KNPP Fitness For Duty Program are contained in the General Administrative Procedures as follows:

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| GAP 2.17.1 | Random Personnel Selection Procedure |
| GAP 2.17.2 | Specimen Collection Procedure |
| GAP 2.17.3 | Alcohol Testing Program |
| GAP 2.17.4 | Behavioral Observed Just Cause Testing |
| GAP 2.17.5 | Fitness For Duty Test Results |
| GAP 2.17.6 | Fitness For Duty Quality Assurance Program |
| GAP 2.17.7 | Employee Assistance Program |
| GAP 2.17.8 | Fitness For Duty Performance Data Report |
| GAP 2.17.9 | Fitness for Duty Records |