

WISCONSIN PUBLIC SERVICE CORPORATION

KEWAUNEE NUCLEAR POWER PLANT

GENERAL ADMINISTRATIVE PROCEDURE

NO. GAP 2.17.4

REV. A

TITLE Behavioral Observed Just Cause Testing

DATE JAN 22 1990

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REVIEWED BY

Michael J. Sorenson

APPROVED BY

M L Mander

NUCLEAR SAFETY RELATED

YES

NO

PORC REVIEW REQUIRED

YES

NO

SRO APPROVAL OF TEMPORARY CHANGES REQUIRED

YES

NO

1.0 PURPOSE

The purpose of this procedure is to establish guidelines to follow when making testing for just cause decisions.

2.0 APPLICABILITY

This procedure 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 10CFR26 and has been approved by WPSC may not be subject to this procedure.

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

3.0 REFERENCES

3.1 10CFR Part 26

3.2 ACD 2.17, Fitness For Duty Program

3.3 WPSC Corporate Fitness For Duty Program

3.4 GAP 2.17.5, Fitness For Duty Test Results

3.5 WPSC Personnel Manual Section 30.40 entitled Discipline

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4.0 PROCEDURE

- 4.1 WPSC is committed to a program of continued observation of employees, contractors, and vendors for indication of any on-the-job behavior which may impair job performance. If such behavior is detected, corrective measures outlined in this program shall be taken. Corrective measures shall include investigation of the circumstances and an evaluation of the risk involved in continuing unescorted access at KNPP which may include discipline up to and including termination.
- 4.2 Abnormal or other than normal behavior including aberrant behavior may have several causes; it may be an indication of excessive stress, marital problems, drug abuse or some medical reason. Whatever the reason, recognition of this change is a key to early detection and the subsequent positive corrective steps being taken for the employee.
- 4.3 When such behavior is recognized, a trained supervisor or where applicable a trained escort shall make a decision as to the cause of this behavioral change. If the individual determines the change merits further action, they will contact their immediate supervisor if available, or in the case of a person under escort if practical his/her immediate supervisor. If none is available, then the supervisor responsible for having the individual on site will be contacted. Together, a cause of action can be determined.
- 4.4 At any time during the investigation, an employee admits to having a problem which may include alcohol or drug abuse and he/she asks for help, they should be immediately referred to the Employee Assistance Program. Participation in the Employee Assistance Program will neither cause nor prevent disciplinary action and does not excuse employees from possible disciplinary action for violation of Corporation policy nor relieve them of responsibility to perform their work in a satisfactory manner.

- 4.5 If the employee fails to explain his or her condition or after accidents involving a failure in individual performance resulting in personal injury, in a radiation exposure or release of radioactivity in excess of regulatory limits, or actual or potential substantial degradations of the level of safety of the plant if there is reasonable suspicion that the worker's behavior contributed to the event, or after receiving credible information (as determined by the Plant Manager or the Manager of Nuclear Power) that an individual is abusing drugs or alcohol, the employee will be relieved of duty and, to diagnose this behavior, must undergo a medical evaluation by a medical doctor designated by the Corporation. This evaluation will include a screen for drugs and alcohol. The decision to proceed with the medical evaluation must be approved by the Plant Manager or designee at Kewaunee Nuclear Plant, or the Manager of Nuclear Power.
- 4.6 If the employee refuses to go for the medical evaluation, the employee will be warned that his or her lack of cooperation constitutes "a failure to follow a valid job directive" and will lead to discipline up to and including termination. Such warning should be made, if at all possible, in the presence of another supervisor, and in the case of a bargaining unit employee, if at all possible, in the presence of another supervisor and a steward. In any event, a witness should be present if at all possible.
- 4.7 If the employee continues to refuse to undergo a medical evaluation, the employee will be advised that he or she is relieved of duty pending further investigation. Arrangements will be made for the employee to be taken home or to another safe place if fitness for duty is questionable. Supervisors should use all reasonable means short of force to prevent the employee from leaving on his or her own. If the employee refuses to be taken home or to another safe place and insists on driving, Security and/or local police should be notified and advised of the circumstances. You should also inform your supervisor and the appropriate department head.
- 4.8 If the employee consents to a medical evaluation, the employee will be taken by the supervisor or designee to a medical doctor designated by the Corporation. A steward may accompany a bargaining unit employee. As part of the medical evaluation, a test for alcohol and other drugs will be completed. At the conclusion of the medical evaluation, arrangements will be made by the supervisor or designee for the employee to be taken home or to another safe place.

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4.9 If during the course of the medical evaluation the employee does not cooperate fully with the directive to see the medical doctor or does not cooperate fully with the medical evaluation of the employee, including the administering of alcohol and other drug tests, the employee will be warned that his or her lack of cooperation constitutes "a failure to follow a valid job directive" and will lead to discipline up to and including discharge. Such warning should be made, if at all possible, in the presence of another supervisor in the case of non-union and salaried employees, and in the presence of another supervisor and a steward in the case of bargaining unit employees. In any event, a witness should be present if at all possible.

4.10 Employees being tested or who refuse to complete a medical evaluation will be relieved of duty pending the results of the evaluation or further investigation.

5.0 RETURN TO WORK

An employee shall be allowed to return to work pursuant to the guidelines of GAP 2.17.5. At the completion of counseling and/or treatment for alcohol and other drug abuse, the employee will not be placed back on duty until a medical evaluation establishes that the employee is free of any substance abuse and therefore falls within the guidelines of WPSC Drug and Alcohol Abuse Policy.