13.7 Fitness For Duty

The Fitness for Duty (FFD) Program is implemented and maintained in two phases; the construction phase program and the operating phase program. The construction and operations phase programs are implemented as identified in Table 13.4S-1.

The construction phase program is consistent with NEI 06-06 (Reference 13.7-1). The operations phase program is consistent with 10 CFR Part 26. NEI 06-06 applies to persons constructing or directing the construction of safety and security-related structures, systems, or components performed onsite where the new reactor will be installed and operated. Management and oversight personnel, as further described in NEI 06-06, and security personnel prior to the receipt of special nuclear material in the form of fuel assemblies (with certain exceptions) will be subject to the operations FFD program that meets the requirements of 10 CFR Part 26, Subparts A through H, N, and O. At the establishment of a protected area, all persons who are granted unescorted access will meet the requirements of an operations FFD program. Prior to issuance of a Combined License, the construction FFD program at a new reactor construction site for those subject to Subpart K will be reviewed and revised as necessary should substantial revisions occur to either NEI 06-06 or the requirements of 10 CFR Part 26.

The following site-specific information is provided:

- The construction site is defined in the Physical Security Plan, Appendix E and is under the control of Constructor. The 10 CFR Part 26 requirements are implemented for the construction site area based on the descriptions provided in Table 13.4S-1.
- Construction workers & first line supervisors (Constructor employees and subcontractors) are covered by the STPNOC approved Constructor FFD Program (elements Subpart K).
- STPNOC employees and STPNOC subcontractor's construction management and oversight personnel are covered by the STPNOC Operations FFD Program and Constructor's employees and Constructor's subcontractors construction management and oversight personnel are covered by the STPNOC approved Constructor FFD Program (elements Subpart A – H, N and O).
- STPNOC security personnel are covered by the STPNOC Operations FFD Program and Constructor's security personnel are covered by the STPNOC approved Constructor FFD Program (elements Subpart A – H, N and O). This coverage is applicable from the start of construction activities to the earlier of (1) the receipt of Special Nuclear Material in the form of fuel assemblies, (2) the establishment of a protected area, or (3) the 10 CFR 52.103(g) finding.
- STPNOC FFD Program personnel are covered by the STPNOC Operations FFD Program and Constructor's FFD Program personnel are covered by the STPNOC approved Constructor FFD Program (elements Subpart A, B, D – H, N, O, and C per licensee's discretion).

- STPNOC security personnel protecting fuel assemblies, or the established protected area, or the facility following the 10 CFR 52.103(g) finding are covered by the STPNOC Operations FFD Program (elements Subpart A – I, N and O).

The operations phase program is consistent with 10 CFR Part 26. (Elements Subpart A – I, N, and O, except for individuals listed in §26.4(b), who are not subject to §§ 26.205 – 209, as described in Section 13.7.2 below.

13.7.1 References

13.7-1 Nuclear Energy Institute "Fitness for Duty Program Guidance for New Nuclear Power Plant Construction Sites," NEI 06-06, Revision 5, August 2009 ~~(ML 092430016)~~.

13.7.2 Program Description

The STP FFD Program is a comprehensive program consisting of drug and alcohol screening, a Behavioral Observation Program, and an Employee Assistance Program. The purpose of the FFD Program is to meet the STPNOC commitment to provide a drug-free, healthful, and safe workplace. To promote this goal, employees are required to report to work in an appropriate mental and physical condition to perform their jobs in a satisfactory manner. This program applies to all covered individuals, which includes STPNOC employees, co-owner employees, STPNOC applicants, contractors, vendors, or supplier employees performing work at STP. STP visitors or short-term consultants/contractors exhibiting behavior suggesting a lack of "fitness for duty" may also be subject to for cause drug and alcohol screening under this policy.