Changes to the Annual Reporting Form

In coordination with representatives of the commercial nuclear power reactor industry, the staff received comments and suggestions as to how to improve the fitness for duty (FFD) electronic reporting (e-reporting) forms that have been designed and posted to meet the reporting requirements of 10 CFR 26.717, FFD Program Performance Data. These e-reporting forms have been successfully used by a majority of NRC licensees and other affected entities in calendar years (CY) 2009 and 2010. From this experience, lessons have been learned to improve the communication of FFD performance data, reduce reporting errors, and enhance consistency.

The highlights of changes made to the Annual Reporting Form (ARF) include:

a) simplified form logic and enhanced drop-down menus;

b) enhanced printing capabilities and visual clarity of text;

c) improved communication of site-specific test results and performance issues; and,

d) enhanced auto-calculation features to reduce errors and improve accuracy.

The current version of the ARF is now: Version 1.3.0 – Nov 8, 2011. This version stamp is located at the bottom left corner of the ARF.

Note that submittal of ARF, Single Positive Test Forms, and the Fatigue Form are required to be submitted to meet the reporting requirement of 10 CFR 26.717.
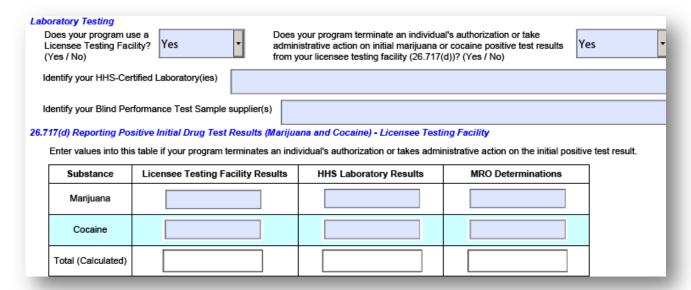

The following changes have been incorporated into the current web-posted ARF, version 1.3.0., Nov 8, 2011.
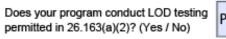
Annual Reporting Form

- **Tests Conducted in the Calendar Year** - improved form presentation by placing test result information in a table format, includes auto-calculation features.

Tests Conducted in the Calendar Year

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access			
Random			
For Cause			
Post-Event			
Followup			
Total (Calculated)			

- **Laboratory Testing** – The NRC staff added a form section to collect the following information:

  o The U.S. Department of Health and Human Services'-certified laboratory(ies) being used by the FFD program;

  o The blind performance test sample supplier(s) being used by the program; and,

  o If a licensee is using a licensee testing facility (LTF), a table pops up to enable the reporting of administrative actions for initial LTF positive results for marijuana and cocaine.
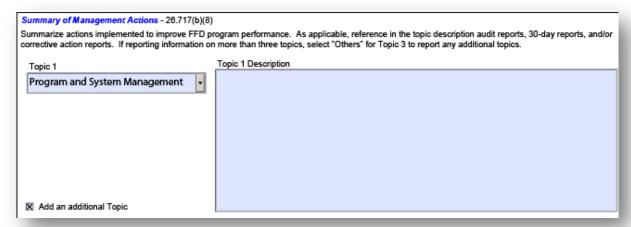

- **Reason for Testing** – The NRC staff removed the "Other" testing category because it is not a required condition for testing in § 26.31(c). NRC staff reviews of FFD performance data determined that tests reported as "Other" tests are being incorrectly categorized and do not provide sufficient information to inform licensee corrective actions to address adverse trends.

- **Substances Tested** – The NRC staff added a question to record if the FFD program is conducting *Limit of Detection* (LOD) testing as per § 26.163(a)(2). The previous form was not clear in describing the information reporting requirement.
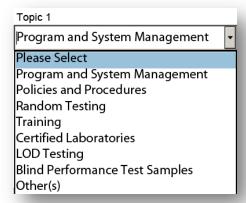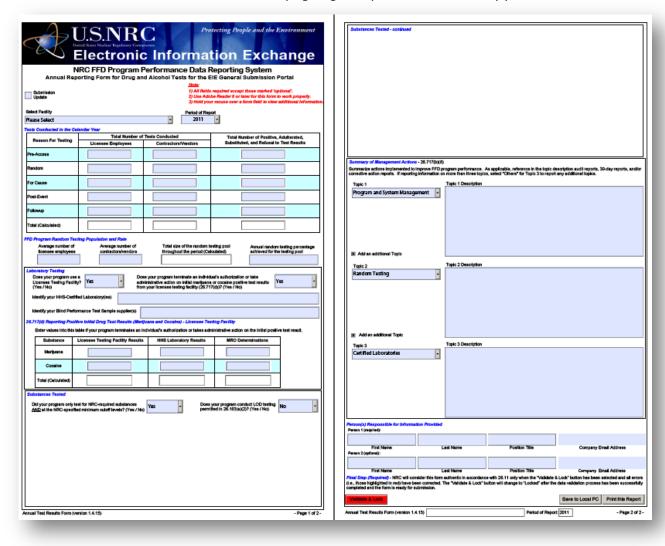
- **Narrative form section** – The NRC staff made the following changes:

  o Revised the form section name from "Narrative" to "Summary of Management Actions" to align with the § 26.717(b)(8) reporting requirement.

  o Increased the visible area in text boxes for each topic description to facilitate licensee reviews.

Summary of Management Actions - 26.717(b)(8)

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Program and System Management
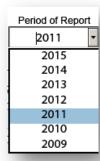
Topic 1 Description

☒ Add an additional Topic

- **Summary of Administrative Actions Topics** – The NRC staff added additional topics in drop-down menu (i.e., LOD Testing, Blind Performance Test Samples) to aide in the communication of FFD performance information.

Topic 1

Program and System Management

Please Select
Program and System Management
Policies and Procedures
Random Testing
Training
Certified Laboratories
LOD Testing
Blind Performance Test Samples
Other(s)

- **Improved form printing** – The NRC staff significantly improved the ability to print the ARF using a two-page format on standard 8.5 by 11 inch paper. The NRC staff also added an auto-population feature to place the site name and reporting year at the bottom of the form in case the pages get separated in hard-copy form.

- **Period of Report** – The NRC staff added a drop-down menu to select the year being reported by the licensee instead to help enable submission updates.

- **Submission update** – The NRC staff enabled logic that by selecting this checkbox a text field will be activated so that a brief description of form changes can be provided. Additionally, form smart logic associated with the "Period of Report" will auto-generate a set of questions to help licensees in determining whether the submission is an update to a prior reporting year.

- **Special characters** (e.g., %:;""()[]#) are now permitted in all text fields.