Changes to the Single Positive Test Form

In coordination with representatives of the commercial nuclear power reactor industry, the NRC 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 on the NRC's public website to meet the reporting requirements of 10 CFR 26.717, FFD 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.

In particular, the highlights of changes made to the Single Positive Test Form (SPTF) include:

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

b) improved information regarding subversions, sanctions, and alcohol test results;

c) better alignment of form fields with the sequence of steps necessary to collect, analyze, and report test results; and,

d) improved clarity and communication of form instructions, including submission updates to correct errors.

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

For licensees that have already submitted SPTFs in CYs 2010 and/or 2011, using a previous version of the SPTF, resubmission is not necessary. However, for all new submissions, please use the current web-posted version 1.3.0.
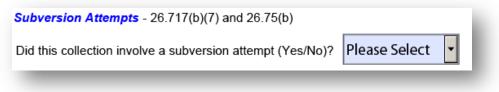
Note that submittal of SPTFs, the Annual Reporting Form, and the Fatigue Form are required to be submitted to meet the reporting requirement of 10 CFR 26.717.

The following changes have been incorporated into the current web-posted SPTF, version 1.3.0., Nov 8, 2011.

SPTF Changes

- **Subversion attempts form section**

  o The appearance of this form section was simplified by hiding subversion attempt checkbox descriptions unless a form user selects "Yes" to the new question "Did this collection involve a subversion attempt (Yes/No)?"

- The subversion attempt checkbox descriptions were refined by replacing 3 generic descriptions with 7 specific descriptions. This change better clarifies when and how the subversion occurred.

Subversion Attempts - 26.717(b)(7) and 26.75(b)

Did this collection involve a subversion attempt (Yes/No)? Yes ▾

- ☐ Refused to provide initial specimen
- ☐ Refused to provide second specimen
- ☐ Specimen temperature (out of range)
- ☐ Specimen paraphernalia identified
- ☐ Specimen characteristics (e.g., color, odor, precipitant)
- ☐ Invalid test result (initial specimen collected) - 26.185(f)
- ☐ Refused to follow directions
- ☐ Other

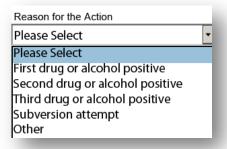- **Dilute specimen reporting**

  - A new question "Was LOD testing conducted (Yes/No)?" will appear to the right of the "Test Validity" form field if a "Dilute" result is selected. This change assists licensees in accurately communicating the *Limit of Detection* (LOD) test result.

Test Validity | Was LOD testing conducted (Yes / No) - 26.163(a)(2)?
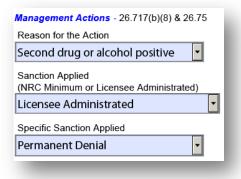Dilute ▾ | Please Select ▾

  - Answering "Yes" to the LOD testing question simplifies cutoff level reporting in the "Substance" and "Additional Substance" form fields.

- **Alcohol test result reporting** – The NRC staff replaced the initial and confirmatory testing cutoff levels with a new question "What 26.103 BAC level was exceeded?" This change will help inform the NRC staff of the effectiveness of the alcohol confirmatory cutoff levels in 10 CFR 26.103 to help determine the effectiveness of this regulatory requirement and inform licensees of trends in the detection of alcohol abuse.

What 26.103 BAC level was exceeded?

Please Select ▾
Please Select
0.04 or greater
0.03 and in work status at least 1 hr
0.02 and in work status at least 2 hrs

- **Management Actions** – This section was improved to more accurately reflect information on the sanction applied to an individual. The changes will help licensees accurately communicate whether they applied a more stringent sanction or the NRC minimum sanction. The changes will also assist in assuring that the rule is effectively implemented.

    o   Eliminated the following unnecessary "Reason for the Action" items:
        MRO Confirmation; Misuse; Violation of 5-hour abstinence rule; Sale, Use or Possession in PA; and Subsequent positive test result from testing.

    o   Eliminated checkbox format for reporting "Reason for the Action" information and replaced it with a drop-down menu list.

    o   Revised the title of form field from "Individual Sanction" to "Specific Sanction Applied" to clarify the intent of the information to be provided.

    o   Added a new form field "Sanction Applied (NRC Minimum or Licensee Administrated)" to facilitate uniform reporting of more stringent sanctions imposed by some licensees. For example:

o Included auto-population form logic to reduce licensee data entry in the "Specific Sanction Applied" form field if the "NRC minimum" sanction is applied. For example:

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

- **Form submission update process** – The NRC staff added a comment box to provide a brief summary of form changes. This addition was necessary to enable licensees to accurately communicate why the submission update was required.

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

- **Updated mouse-over pop up text** was provided in the following form fields:
    o Unique Reference Number (licensee supplied)
    o Reason for Testing
    o Test Validity
    o Was this collection refused (yes/no)?