

August 29, 2011

NRC Inspector,

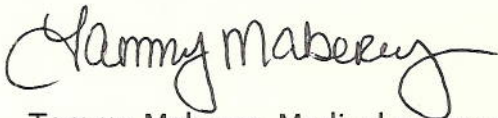
I work at a nuclear fuel facility and have responsibilities with the fitness for duty program onsite. I have a question about breath/blood alcohol collections. My facility hires from across the U.S. and we are finding it more difficult everyday to find a facility that uses EBT anymore. Most facilities state they either do not perform BAC or they use a toxic screen which includes the blood alcohol level.

In reading the 10 CFR 26 regulations, alcohol testing should be completed by EBT or oral fluids. It does not reference blood alcohol or if it can be used during pre-employment screening or for-cause screenings if an alternative collector is utilized.

My question is can a blood toxic screen be used as an alcohol test for pre-employment testing and for-cause testing, if an alternative collector is needed to be utilized?

Thank you for your time and thought on this matter.

Sincerely,



Tammy Maberry, Medical manager

I have enclosed a self addressed and stamped envelope for your reply. Thank you.