

From: 24210@ameren.com[SMTP:24210@AMEREN.COM]
Sent: Wednesday, March 16, 2011 4:59:20 PM
To: FitnessForDuty Resource
Subject: Response from "Contact Us About Fitness-for-Duty"
Auto forwarded by a Rule

Below is the result of your feedback form. It was submitted by

(24210@ameren.com) on Wednesday, March 16, 2011 at 16:59:20

comments: 10CFR26 Section 26.187.d.(7), This section addresses the requirement to train a Substance Abuse Expert (SAE) in "reporting and recordkeeping requirements of this subpart". Relative to the training requirement for reporting, is this requesting that SAEs be trained to the requirements of 10CFR26.719? Does the "other entity" in 10CFR26.719 include the SAE and if so, do they have a direct reporting requirement to the NRC, as that section implies?

If the intent is that the "other entity" report to the licensee, should the regulation be clarified to include all persons within the scope of 10CFR26, such as SAE, MRO, Psychologists, etc. to have the same reporting requirements to the licensee that is outlined in 10CFR26.35(c)(2) so that the licensee, in turn, can report that to the NRC? Currently section 10CFR26.35(c)(2) only applies to Employee Assistance Program personnel. It is likely that this type of information could be discovered during a determination of fitness.

name: Anna M. Lee

organization: Ameren Callaway Plant

address1: P.O. Box 620

address2:

city: Fulton

state: MO

zip: 65251

country: USA

phone: 314-225-1159
