

50-206
361
362

RECEIVED
NRC

SCE

Southern California Edison Company

P. O. BOX 128

1985 MAY 31 AM 10:59

SAN CLEMENTE, CALIFORNIA 92672

HAROLD B. RAY
VICE PRESIDENT & SITE MANAGER
SAN ONOFRE

REGION V I&E TELEPHONE
714-361-8470

May 28, 1985

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region V Office
1450 Maria Lane, Suite 210
Walnut Creek, California 94596-5368

Dear Mr. Martin:

Attached for your information is a letter to Mr. Dircks dated May 6, 1985, concerning renewal of certain SRO licenses. Although we are a member of the utility group represented by KMC, to my knowledge this is not a problem currently in Region V, and the letter is not based on our having raised the concern.

Although I agree with the principal points of the KMC letter, it is also necessary in my view to determine what is needed to meet the "actively engaged" requirement. As usual, I think this should be done through deliberate discussion between the industry and the NRC leading to a clear statement of criteria. With this in mind, I am seeking to join the NUMARC working group that is dealing with operator requalification.

On another matter of current interest in the Region, I thought you might be interested in our use of drug testing by urinalysis at San Onofre. We use both periodic and "on demand" urinalysis as one of the criteria for granting unescorted access to the Protected Area. (We do not believe that we can directly use urinalysis to establish unfitness for duty, except when the levels of drugs in the urine are very high.) Anyone who shows any signs of illegal drugs in their urine is immediately denied unescorted access to the Protected Area. Such access can be reinstated only under particular circumstances which ensure that they abstain from use on a continuing basis.

8506130499 850528
PDR ADDCK 05000206
V PDR

IE-01
1/1

Mr. John B. Martin

-2-

May 28, 1985

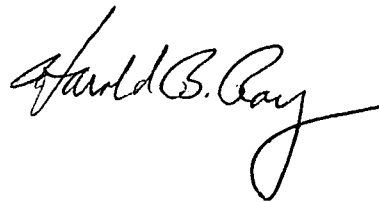
SCE

We do not link failing a urinalysis directly to termination or to any other required disciplinary action. However, personnel who are not able to maintain unescorted access privileges, and who cannot find a position elsewhere that does not require such access, are terminated. This has occurred at San Onofre.

With respect to fitness for duty, we do have a program to deal with that issue directly, regardless of whether or not the person in question has unescorted access privileges. Where chemical testing is appropriate, a blood test is used. Disciplinary action, including termination, is directly linked to fitness for duty, as is possession or use of alcohol or illegal drugs onsite.

If you have any questions about the above, or if you would like additional information, please let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Harold B. Ray". The signature is fluid and extends to the right.

Attachment