

**Additional costs to Southern Nuclear
due to NRC FFD testing not being fully aligned with DOT standards**

Audit costs – usually this involves two personnel to travel to the lab. This often involves sending a tech specialist (toxicologist) to the lab as well. Estimate \$4K in travel costs (three people) and \$7.5k for toxicologist services, for an estimated total cost of \$11k per year.

Lab issues – This usually involves one person investigating and will take approximately 20-40 person-hours depending on the issue. May also involve someone to go to lab to confirm the lab has accurately implemented the correctives. Each incident (typically a testing incident such as blind performance or mistake made on a specimen) costs about \$5k, and there are two to three incidents per year, for an estimated total of \$15K per year. The specialized QA/QC required for NRC-specific testing makes the process more error prone and therefore more likely to result in incidents.

HHS lab – if NRC were to align with DOT now (November 2015), then the savings would be (according to vendors), about \$5 per test. This would save SNC about \$60k per year (SNC performs about 12k tests / year).

SAP instead of SAE – NRC requires that SAE (substance abuse expert) be used in lieu of SAP (substance abuse professional). SAPs are certified by the DOT; however, there is no uniform certification for the NRC-required SAEs. In essence, SAE is an SAP trained person with some training on NRC-specific areas. Currently, SNC has to train personnel to fill the function of SAE and, per the regulation, SNC must keep its SAEs covered under SNC's FFD program. This involves the having background checks and in the random testing pool as well as training. To fulfill this, SNC has trained its MROs to fulfill this function. The MROs employ a psychologist to compile the objective data and conduct an interview of the employee. The MROs will then review the information and agree or disagree with the recommendations. If the NRC would allow the use of the DOT SAP, which has a nationally recognized training program and a large pool of qualified personnel (SAE does not), then SNC could save both money and time. Further, there would be better result, as an SAP is specifically trained in areas of substance abuse and other FFD issues. SNC estimates that this would save \$5k-\$10k per year, but there is the additional advantage of having a safer product due to the more stringent controls on SAP certification.

DOT collection facilities – SNC would like to be able to use any DOT collection facility, rather than an NRC certified facility. Using DOT collection facilities is technically allowed, but only under certain, limiting circumstances that are not practical. Last year, SNC had about 400 new hires. Of those, roughly 20% had to travel to a site from outside the area to be tested. SNC must pay for new hires to travel to sites to be collected; this is roughly \$500 to \$1k per person, i.e., a total of \$40k to \$80k in expenses. However, if all DOT collection facilities could be used, then new hires would not have to travel solely for drug testing requirements. In fairness, some of the travel costs for some of the new hires may be incurred anyway for other tasks, so the magnitude may not be as high as \$40k-\$80k. Nevertheless, there is some amount of new hires that must travel solely for testing, and those savings would be on the order of tens of thousands of dollars.