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SUBJECT: Discusses proposed changes to FFD program requirements re annual random testing frequency of 50% should not be changed.

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 TITLE: Fitness for Duty Program: Blind Performance Test/Other

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**DUKE POWER**

August 9, 1994

U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attention: Docketing and Service Branch

Subject: Consideration of Changes to Fitness-For-Duty Requirements;  
Duke Power Company Comments

Duke Power Company has reviewed the options presented in the NRC's May 11, 1994 Federal Register notice requesting comments on proposed changes to the Fitness-For-Duty (FFD) program. Duke recommends that the annual random testing frequency not be changed from the current 50% of the test pool of persons granted unescorted access and/or who are required to report to the Technical Support Center or Emergency Operations Facility. This recommendation is based on three thoughts. First, categorizing test candidates by job function, specific access privileges (e. g., protected vs. vital areas), or worker classification would create an addition administrative burden that would not be offset by any tangible benefit. Second, an attempt to identify persons with access to the protected area for whom testing is not necessary could increase vulnerability or risk resulting from accidents or deliberate acts sabotage or vandalism. Finally, a further reduction in test frequency below the current 50% may inappropriately reduce the emphasis of the FFD program to a level that is lower than is desired to achieve high reliability and trustworthiness of individuals.

In addition, Duke Power endorses the comments submitted by NEI by letter dated August 8, 1994.

Very truly yours,

M. S. Tuckman

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U. S. Nuclear Regulatory Commission  
August 9, 1994  
Page 2

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