

**DAVID R. KLINE**  
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November 7, 2016

Ms. Annette L. Vietti-Cook  
Secretary  
ATTN: Rulemakings and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Industry Comments on Federal Register Notice of Propose Revision to Policy; "Processing Fitness-for-Duty Drug and Alcohol Cases," (81 FR 69010) (Docket ID NRC-2016-0185)

**Project Number: 689**

Dear Ms. Vietti-Cook:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)<sup>1</sup> appreciates the opportunity to comment on the recent Federal Register Notice on "Processing Fitness-For-Duty Drug and Alcohol Cases" Policy revision dated for October 5<sup>th</sup>, 2016. The document details Policy to indicate that the NRC typically will not consider Fitness-for-Duty (FFD) Drug and Alcohol (D&A) related violations for enforcement unless the licensee's FFD program has apparent deficiencies.

After review of the document, NEI and industry support staff actions toward efficiencies in this process.

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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If you have any questions or require additional information, please contact AJ Clore at (202) 739-8025; [ajc@nei.org](mailto:ajc@nei.org) or me.

Sincerely,

A handwritten signature in black ink, appearing to read "David R. Kline". The signature is written in a cursive style with some loops and flourishes.

David R. Kline

c: NRC Document Control Desk

## McCloskey, Bridin

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**Attachments:** 11-07-16\_NRC\_Industry Comments on Processing FFD Drug and Alcohol Cases (Docket ID NRC-2016-0185).pdf

**From:** "KLINE, Dave" <dk@nei.org>

**Subject:** [External\_Sender] Industry Comments on Federal Register Notice of Propose Revision to Policy; "Processing Fitness-for-Duty Drug and Alcohol Cases," (81 FR 69010) (Docket ID NRC-2016- 0185)

**Date:** 07 November 2016 14:18

**To:**

November 7, 2016

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**Subject:** Industry Comments on Federal Register Notice of Propose Revision to Policy; "Processing Fitness-for-Duty Drug and Alcohol Cases," (81 FR 69010) (Docket ID NRC-2016- 0185)

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After review of the document, NEI and industry support staff actions toward efficiencies in this process.

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