

# PRIORITY 1

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SUBJECT: Discusses comment on 50FR24373 re reevaluation of random drug testing scope & document SECy-94-016, "Reevaluation of Scope of Random Drug Testing Requirements in 10CFR26."

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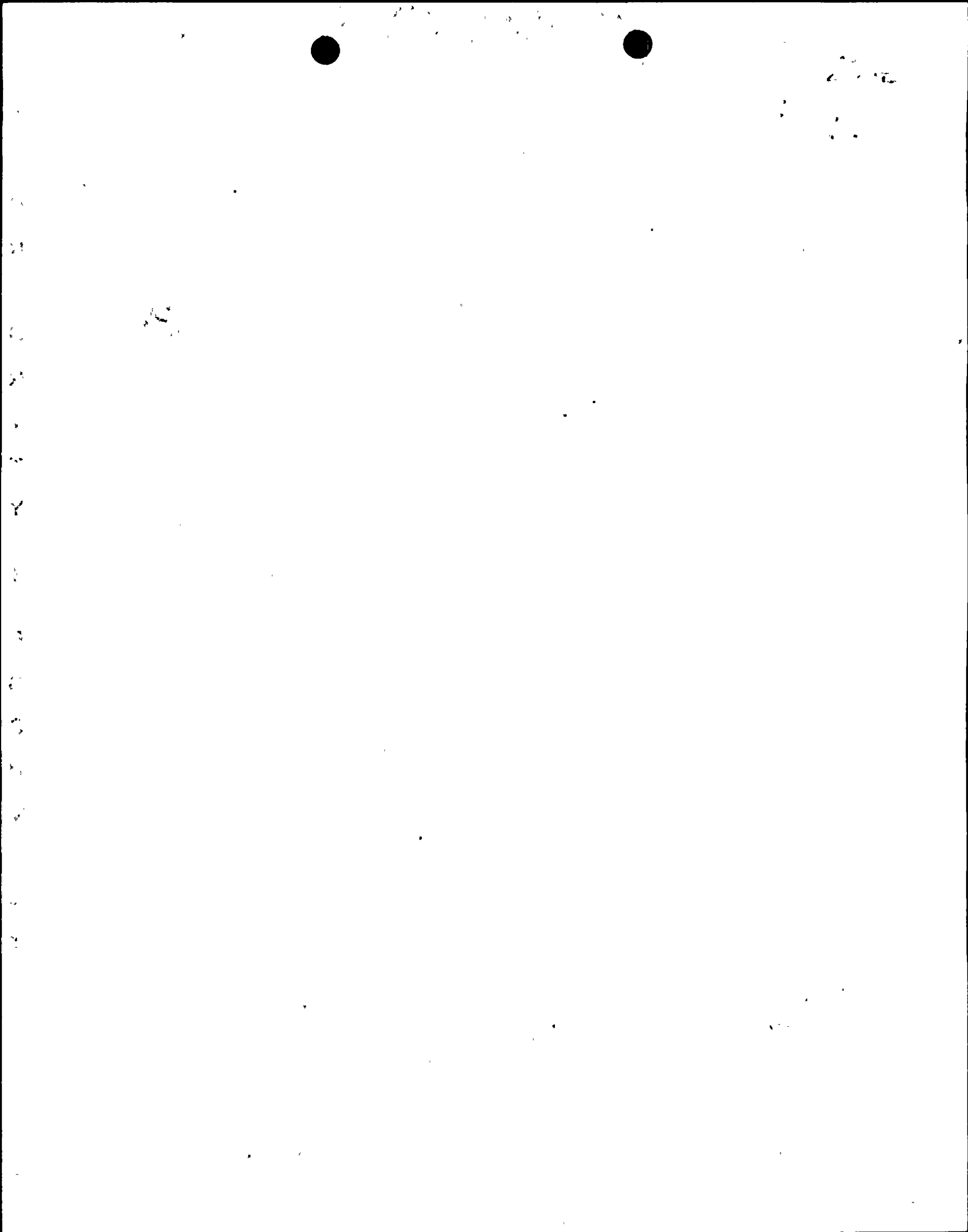
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August 8, 1994

PG&E Letter DCL-94-170



U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing and Service Branch

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Comments on Consideration of Changes to  
Fitness-for-Duty (FFD) Requirements

Gentlemen:

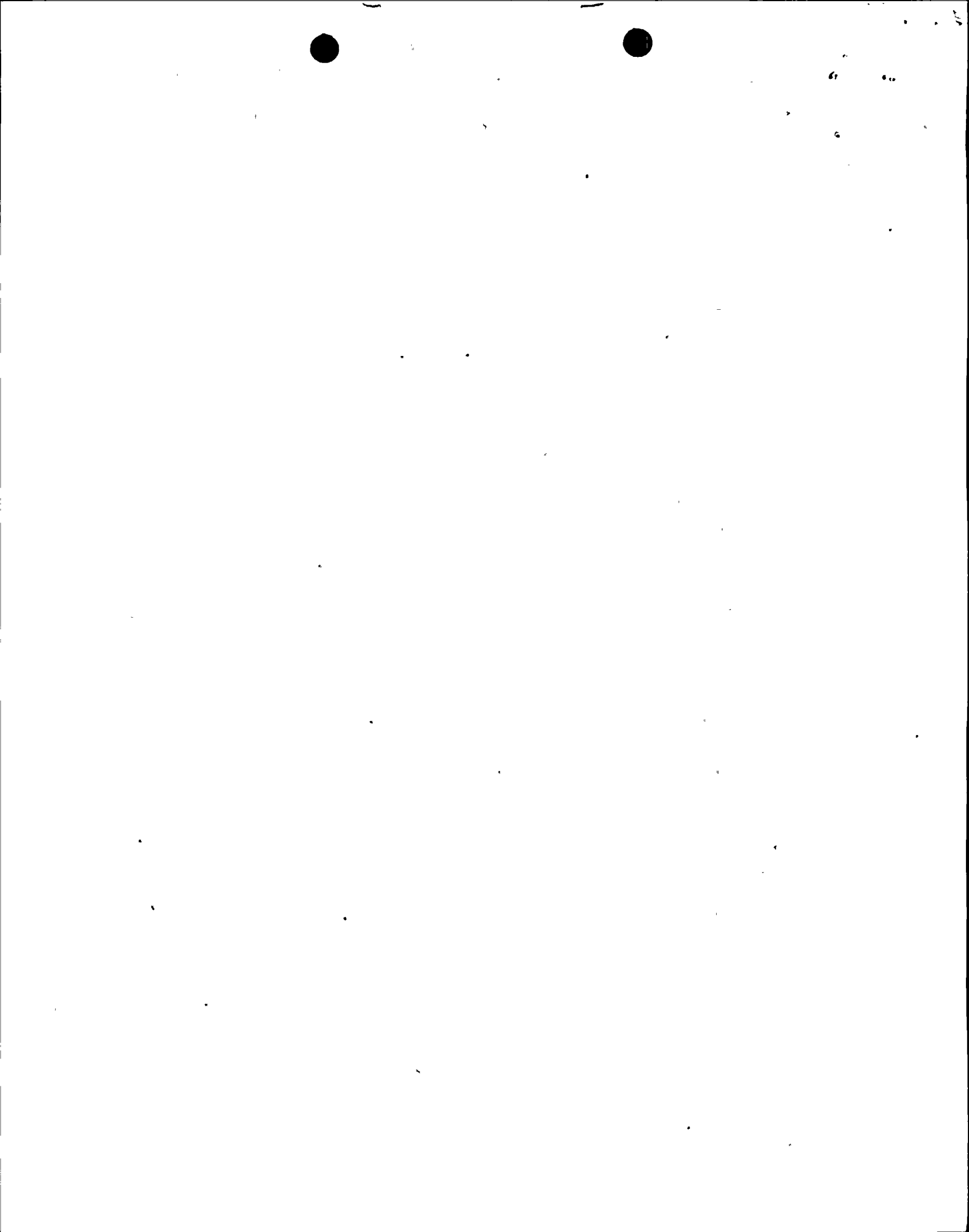
We have reviewed your request for comment (59 FR 24373, May 11, 1994) regarding the reevaluation of the random drug testing scope and the related document SECY-94-016, "Reevaluation of the Scope of the Random Drug Testing Requirements in 10 CFR 26." The information provided was useful in our evaluation of options to the current random drug testing program, and we appreciate the opportunity to comment on the proposed changes.

PG&E believes the issue is whether random testing should continue to apply to all persons granted unescorted access to protected areas or only to specific worker categories, such as those with safety-related duties. Our position on this issue is that the scope of the random drug testing program should remain unchanged. This is based on concerns that a reduced random drug testing pool could potentially reduce the effectiveness of PG&E's efforts to assure the integrity of its workforce. The specific reasons supporting our view that the random drug testing program should remain unchanged are as follows:

1. One of the key elements that promoted employee acceptance of the FFD rule and random drug testing in our nuclear program was its broad application to all employees with unescorted access to plant protected areas. A change in the scope of the random drug testing program may be divisive and reduce the teambuilding culture within our organization.
2. Our plant security program uses a defense-in-depth concept requiring an individual to traverse multiple barriers to gain access to equipment important to the safe shutdown of the plant. Personnel with unescorted

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access to plant protected areas are scrutinized for eligibility (background investigations, psychological evaluations, drug and alcohol tests, and continual behavioral observation) to assure that this defense-in-depth concept is maintained. Excluding individuals with unescorted access from the random drug testing program could diminish this defense-in-depth concept by allowing employees access to portions of the plant protected area without being subjected to random drug testing.

3. A reduction in the scope of the random drug testing program would exempt certain individuals with unescorted access to protected areas from the random drug testing program. This is a concern because the random drug testing program plays a significant role in providing assurance regarding worker reliability and trustworthiness. An individual with unescorted access to the plant protected area, even without vital area authorization, has access to plant systems and components which, if improperly manipulated, could cause a plant transient and challenge plant safety systems. SECY-94-016 stated that most reactor trips at U.S. nuclear power plants during the period 1987 through 1993 began by equipment normally located within a plant's protected area and not within a vital area. This statistic is evidence of the need to assure proper operation of equipment within the plant protected and vital areas.
4. One of the proposed alternatives being explored to the current random drug testing program includes the exclusion of clerical and administrative employees from the program. Many members of our clerical and administrative staffs perform the functions of document control and document updating. Many of these documents are important to the safety or security of our facility and must be handled properly. These documents, such as maintenance and operating procedures, surveillance procedures, work orders, quality control procedures, radiological control procedures, and design drawings, are relied upon directly by licensed operators, maintenance personnel, design engineers, and quality control inspectors in their daily activities involving reactor controls and other safety-related equipment. Therefore, mistakes by clerical or administrative personnel in the control or revision of these documents can directly impact the safe operation of the nuclear power plant, even if the clerical or administrative personnel in question do not directly manipulate or contact the reactor controls or equipment itself. In addition, other clerical staff may also be called upon to assist in document control, even if their normal duties are in unrelated areas. Given this use of clerical staff at a nuclear power plant like Diablo Canyon, it is extremely difficult, if not impossible, for clerical functions to be classified and reclassified between safety-related and nonsafety-related functions. Moreover, it is important to us to maintain this flexibility within our operation.
5. Since the implementation of the FFD rule, we have noted work performance improvements. We do not attribute these improvements to the random drug



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testing program alone, however, a reduction in the random drug testing program may adversely affect these results. Quality assurance is good business and helps maintain a high level of plant safety.

6. Two of the alternatives to reduce the random drug testing program pool are considered undesirable from a cost of implementation standpoint. A new personnel management system would be required to track those included in the program. The alternatives are:

- Option 2. Exclude from the random testing certain groups of workers who have unescorted access to protected areas but not to vital areas.
- Option 4. Apply random drug testing only to persons who have jobs involving safety or security functions regardless of their access to vital areas.

These options use the functions that an individual performs as the principal determinate for enrollment in the random drug testing program. As discussed in paragraph 4 above, this requires the risky and almost impossible task of separating safety-related functions from nonsafety-related functions. This also may limit our flexibility and increase the cost of operating, and is not something we desire.

In conclusion, the random drug testing program is an important part of assuring worker reliability and trustworthiness, and we urge you to leave participation in the program unchanged.

Sincerely,



Gregory M. Rueger

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