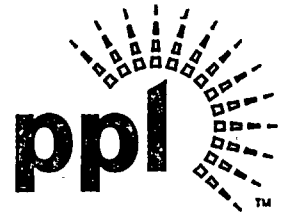


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U.S. Nuclear Regulatory Commission
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Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR INTERPRETATION ON
10CFR26.27(B)(4) FOLLOW-UP TESTS
PLA-4961**

FILE R41-2

**Docket Nos. 50-387
and 50-388**

The purpose of this letter is to request an interpretation of 10CFR26.27(b)(4). The specific part of 10CFR26.27(b)(4) for which an interpretation is requested is the scheduling of follow-up testing after reinstatement of unescorted access for an individual who had tested positive. In part, 10CFR26.27(b)(4) states:

“Any person granted unescorted access or whose access is reinstated under these provisions must be given unannounced follow-up tests at least once every month for four months and at least once every three months for the next two years and eight months after unescorted access is reinstated to verify continued abstinence from proscribed substances.”

Our interpretation of the requirements for the scheduling of follow-up testing is that the three years of follow-up testing are divided into 15 discrete intervals. There are 4 intervals of 30/31 days and 11 intervals of 90 days. Follow-up testing must be conducted at least once during each of these intervals. The time between tests is not a factor in the follow-up test schedule (i.e., the time between tests could exceed 31 days for testing performed once per month and could exceed 92 for testing once every three months). The following is an example for a testing schedule assuming the individual was reinstated on February 15, 1999.

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The discrete intervals and testing for this example could be:

Discrete Interval

Testing Date

February 15, 1999 to March 15, 1999
March 16, 1999 to April 15, 1999
April 16, 1999 to May 15, 1999
May 16, 1999 to June 15, 1999
June 16, 1999 to September 15, 1999
September 16, 1999 to December 15, 1999
December 16, 1999 to March 15, 2000
March 16, 2000 to June 15, 2000
June 16, 2000 to September 15, 2000
September 16, 2000 to December 15, 2000
December 16, 2000 to March 15, 2001
March 16, 2001 to June 15, 2001
June 16, 2001 to September 15, 2001
September 16, 2001 to December 15, 2001
December 16, 2001 to February 14, 2002

February 15, 1999
April 1, 1999
April 17, 1999
June 15, 1999
August 12, 1999
October 13, 1999
February 17, 2000
April 12, 2000
July 5, 2000
November 23, 2000
January 2, 2002
March 23, 2001
June 1, 2001
December 15, 2001
February 14, 2002

It is our interpretation that performance of follow-up testing is only required to be done once per interval and that the time between tests is not part of the requirement. This interpretation is based upon a review of the Statements of Consideration developed when 10CFR26 became a final rule. Does our interpretation constitute a legal interpretation of the requirements of follow-up testing?

Should you have any questions, please contact C. T. Coddington at (717) 542-3294.

Sincerely,


R. G. Byram

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector
Mr. V. Nerses, NRC Sr. Project Manager

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