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 BOLDT,G.L. Florida Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION
 CHILK,S.J. Office of the Secretary of the Commission

SUBJECT: Comment opposing proposed rule 10CFR26 re fitness-for-duty programs. Believes proposed rule unnecessary & places undue restriction on util mgt prerogative.

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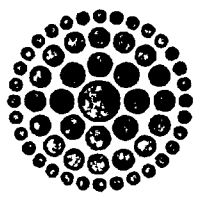
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Florida Power
CORPORATION

October 29, 1990
LFM90-0085

Mr. Samuel J. Chilk
Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Docketing and Services Branch

Subject: Proposed Revision (55 FR 35648)
to the Fitness-for-Duty Rule

Dear Mr. Chilk:

The purpose of this letter is to provide Florida Power Corporation's (FPC) comments on the subject proposed rule revision. The revision would add a sentence to the end of paragraph 26.24(d) of the Fitness-for-Duty rule stating, "no individual may be removed or temporarily suspended from unescorted access based solely on unconfirmed positive initial screening test results in the absence of other evidence that the individual is impaired or that the individual might otherwise pose a safety hazard."

It is FPC's opinion that the proposed rule revision is unnecessary and places an undue restriction on utility management prerogative. Utility management should have discretion with regard to the range of actions that could be taken in the event of positive drug testing results. Therefore, FPC, recommends that the proposed Fitness-for-Duty rule revision not be adopted.

Sincerely,

G. L. Boldt
G. L. Boldt
Vice President
Nuclear Production

GLB/GMF

xc: Mr. Rich Enkeboll, NUMARC

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