AGENDA

PUBLIC MEETING (WEBINAR) REGARDING ANNUAL FITNESS-FOR-DUTY (FFD) REPORTING OF DRUG AND ALCOHOL INFORMATION AND USE OF ELECTRONIC REPORTING SUBMISSION FORMS

Tuesday, January 30, 2018
1:00 p.m. – 2:30 p.m.

Webinar Registration: https://attendee.gotowebinar.com/register/8673175706845351170

Please do not wait until the day of the webinar to register. After clicking on the web link and registering, you will receive an e-mail confirmation that will include a web link to the webinar.

Audio: Participants can use either their telephone (i.e., dial 415-655-0060 and enter the Pass Code shown after joining the webinar) or use their computer microphone and speakers.

START TIME	TOPIC
1:00 p.m.	Introduction
1:05 p.m.	NRC Presentation and Discussion with Industry Representatives • Annual fitness-for-duty (FFD) reporting requirements • FFD electronic reporting forms (drug and alcohol only) • Common reporting errors • Guidance and best practice suggestions • Live demonstration of e-form completion
2:15 p.m.	Public Comments and Questions
2:30 p.m.	Adjourn

Discussion

During this webinar, the U.S. Nuclear Regulatory Commission (NRC) technical staff will briefly describe the Title 10 of the *Code of Federal Regulations* (10 CFR) 26.417 and 26.717 annual reporting requirements. These requirements may be viewed at NRC Web site http://www.nrc.gov/reading-rm/doc-collections/cfr/part026.html.

The NRC technical staff then will discuss the features of the two electronic reporting forms (e-forms) used for FFD program performance data reporting, NRC Form 890 (Single Positive Test Form), and NRC Form 891 (Annual Reporting Form for Drug and Alcohol Tests). These forms may be viewed at the NRC Web site http://www.nrc.gov/reactors/operating/ops-experience/fitness-for-duty-programs/submit-ffd-reports.html.

The NRC technical staff also will describe common reporting errors observed during previous reporting years, discuss best practice suggestions, and will provide guidance on filling out the e-forms for a variety of reporting scenarios. Finally, the NRC technical staff will conclude the webinar by answering questions.

To prepare for this webinar, industry representatives may consider: (1) reviewing previous feedback provided by the NRC technical staff on FFD program performance report submissions;

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(2) developing questions that have arisen in completion of e-forms for the upcoming 2017 reporting cycle; and (3) developing recommendations on how the e-form design or reporting process can be improved.

At a minimum, the NRC technical staff plan to discuss the following questions:

NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests (ARF)

1. How do we correct an error in an ARF that has already been submitted to the NRC (i.e., can we make a submission update)?

2. Can we delete a submission that has already been submitted to the NRC?

3. How is the random testing rate validated? We're seeing an error message appearing in red above the value that we've entered.

4. What information do we need to report on special analysis testing (i.e., *Limit of Detection* (LOD) drug testing)?

5. How do we report information on testing for additional substances (both if the testing is limited to an individual, as well as if the testing is applied programmatically)

6. What type of information is to be reported in the "Summary of Management Actions"?

7. What is the difference between the HHS-Certified Laboratory (Primary) and HHS-Certified Laboratory (Backup) fields?

NRC Form 890, Single Positive Test Form (SPTF)

1. How do we correct an error in a SPTF that has already submitted to the NRC (i.e., can we make a submission update)?

2. Can we delete a submission that has already been submitted to the NRC?

3. We're having trouble determining which labor category to select for a supervisor in facility maintenance, do we select "Supervisor" or "Maintenance (safety-significant)"?

4. Please explain what cutoff level information is requested if LOD drug testing is performed on a specimen.

5. Why should we provide the optional information on whether an individual is an outage worker?

6. If several specimens are collected from a donor during the same testing event, do we complete one SPTF for each specimen collected?

7. How do we report subversion attempt information for the following events?

    - Case 1: Initial specimen provided is out of temperature range (negative results) and the second specimen collected under direct observation is drug positive

- Case 2: Initial specimen provided is out of temperature range (negative results) and the donor refused to provide a second specimen under direct observation

- Case 3: The donor refused to provide an initial specimen, such as:
    - Failed to appear for a required test
    - Collector discovered paraphernalia and stopped the collection process
    - The donor could not provide a specimen of adequate volume in 3-hours and the medical evaluation determined no medical condition.

- Case 4: Initial specimen provided is reported by the HHS-certified laboratory as "invalid" and the second specimen collected under direct observation is drug positive

- Case 5: The specimen provided by the donor is reported as dilute (validity test result) and special analysis testing (limit of detection) determines that the specimen is drug positive

8. How do we know that the NRC received the e-forms that we submitted through the General Submission Portal?

    Note: Fitness for duty performance information should always be submitted through the NRC's Electronic Information Exchange (EIE). Commercial nuclear industry representatives who complete and submit the annual FFD program performance reports to the NRC under 10 CFR 26.417 and 26.717 are encouraged to go to the NRC's EIE Web site to familiarize themselves with this reporting portal located at http://www.nrc.gov/site-help/e-submittals.html.

    If you have questions or comments on the use of this portal, please contact our Help Desk at 866-672-7640. Also, early in the process, representatives may wish to:

    - ✓ Obtain a digital certificate to enable electronic reporting or
    - ✓ Verify that an existing digital certificate is still valid, and
    - ✓ Ensure that internal procedures enable the timely electronic submission of calendar year 2017 FFD performance information, using the ARF and SPTFs, prior to March 1, 2018. Note that a licensee developed cover letter is not necessary.

Public Comments and Questions

This is a Category 1 public meeting. The public is invited to observe this meeting by linking into the webinar using an internet browser. The public will have an opportunity to communicate with the NRC after the business portion of the meeting, but before the meeting is adjourned. Specific questions to licensee representatives or about specific sites or occurrences will be considered outside the scope of this meeting.

Disclaimer

The conduct of this meeting is a public service and solely for informational purposes and is not, nor should it be deemed as an official NRC position, opinion or guidance, or "a written interpretation by the General Counsel" under 10 CFR 26.7, on any matter to which the information may relate. The opinions, representations, positions, interpretations, guidance or recommendations that may be expressed by the NRC technical staff during this meeting are solely the NRC technical staff's and do not necessarily represent the same for the NRC. Accordingly, the fact that the information was obtained through the NRC technical staff will not have a precedential effect in any legal or regulatory proceeding.