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U.S. Nuclear Regulatory Commission
 Attention: Document Control Desk
 Washington, D. C. 20555

Gentlemen:

Subject: Three Mile Island Nuclear Station Unit 1 (TMI-1)
 Three Mile Island Nuclear Station Unit 2 (TMI-2)
 Oyster Creek Nuclear Generating Station (OC)
 Operating License and Docket Nos:
 DPR-50/Docket 50-289 (TMI-1)
 DPR-73/Docket 50-320 (TMI-2)
 DPR-16/Docket 50-219 (OC)
 10 CFR Part 26 Fitness-for-Duty Program Certification

GPU Nuclear Corporation (GPUN) has implemented a Fitness-for-Duty (FFD) program designed to meet the requirements of 10 CFR Part 26. This corporate-wide FFD Program is applicable to all GPUN nuclear stations covered by the rule. GPUN's program, which is based on a program in place since November 1981, has been augmented with the additional provisions of 10 CFR Part 26 (most significantly: random testing and awareness training) starting November 1, 1989. Since November 1, 1989, over 900 FFD tests have been conducted for the various criteria of testing (e.g., 450 random and 450 pre-badging).

Since November, we have monitored the program carefully and have modified procedures, controls, and practices to address problems or needed clarifications. Recognizing the importance of this activity, GPUN commenced a detailed self assessment quality assurance audit of the FFD program and its implementation in early December prior to the effective date of the rule. Preliminary results show that the general performance objectives of 10 CFR Part 26.10 have been satisfied. However, the self assessment quality assurance audit has identified the need to take certain additional actions. These additional actions are currently being addressed and changes, where required, will be completed in accordance with existing corrective action procedures. Once this self assessment process is completed and corrective actions taken, GPUN has full confidence that all requirements will be satisfied. GPUN will inform the NRC of the status of these actions by March 1, 1990.

Therefore, in accordance with 10 CFR 26.73(d) and based upon the foregoing, GPUN certifies that it has implemented a Fitness for Duty program designed to meet the requirements of 10 CFR Part 26.

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GPUN has adopted the cut-off levels and substances list set forth in 10 CFR Part 26 for drug and alcohol testing performed: 1) prior to granting unescorted access to protected areas; 2) for cause; 3) for follow-up to verify continued abstinence; and, 4) for random testing. For drug and alcohol tests performed for the purpose of pre-employment screening, GPUN has more stringent cut-off levels for certain substances and three additional substances for which it tests beyond those set forth in Part 26.

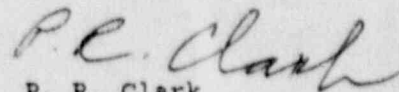
The GPUN more stringent requirements for pre-employment are specifically as follows:

<u>Substance</u>	<u>Initial Test (ng/ml)</u>	<u>Confirmatory Test (ng/ml)</u>
Marijuana metabolites	50*	10*
Opiates	300	Morphine 200*
		Codeine 200*
Phencyclidine	25	20*
Barbiturates**	200	200
Benzodiazepine**	300	300
Methaqualone**	750	750

*Denotes difference from Part 26

**Additional substance

Very truly yours,


P. R. Clark
President

PRC/GG/cjg

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