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(58FR15810)
Pennsylvania Power & Light Company

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Robert G. Byram
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Mr. Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn.: Docketing and Service Branch

**SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON PROPOSED REVISION TO
10 CFR 26 : FITNESS FOR DUTY
PLA-3990**

FILE R41-2

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

Dear Mr. Chilk:

The following are Pennsylvania Power & Light Company's comments on the proposed revision to 10 CFR 26.24:

- We concur with the specific change that will permit PP&L to reduce the random testing rate for employees to an annual rate equal to at least 50 percent of the workforce.
- We disagree with maintaining the 100 percent rate for contractor and vendor employees. Based on an industry survey of data from 1990 and 1991, we believe the annual random testing rate for contractors/vendors should also be reduced to 50 percent of the workforce. Employees and contractors/vendors are subject to the identical access authorization and fitness-for-duty requirements, including behavioral observation.
- In response to the NRC's interest as to whether certain positions critical to the safe operation of a nuclear power plant, such as licensed reactor operators, should be excluded from any reduction of the random testing rate, it is PP&L's position that all employees should be tested at the same annual rate as defined in the proposed change, i.e., 50 percent of the workforce. We believe our random testing program is an effective deterrent and that no single group or combination of positions should be excluded from the proposed reduction.

Very truly yours,


R. G. Byram

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cc: NRC Document Control Des~~W~~ (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector - SSES
Mr. R. J. Clark, NRC Sr. Project Manager - Rockville