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Secretary of the Commission
Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Gentlemen and Mesdames:

According to the August 22nd issue of The Arizona Republic, you are "accepting public comments on a proposed regulation change designed to ensure that nuclear-plant employees with access to protected areas are not under the influence of drugs or alcohol or otherwise 'unfit for duty'".

It seems to me that if an employee uses marijuana or alcohol in his/her off-duty hours, it would be that person's personal business; however, it is my opinion that no one under the influence of drugs or alcohol should be allowed to work on-site at any nuclear facility. Likewise, drugs and alcohol should not be allowed on the premises of such a facility, and an employee education program for the purpose of laying down these ground rules should be a hard and fast rule for all employees.

Breath tests for alcohol and alertness tests for drug use seem to be acceptable means of exercising proper care; however, I think every effort should be made to preserve a person's dignity while administering these tests. If it is determined that a person is a hard drug (heroin, etc.) user, that person should certainly not be employed at a nuclear plant. Too much is at stake in the matter of safety of a large number of our citizens to "take a chance" on employees unfit, for one reason or another, for their jobs.

The employee education program should indicate specific action for a good employee to take in the event he/she is suffering from fatigue, stress, illness or temporary physical impairments. That employee should be encouraged to voluntarily report the problem to the office and then be reassigned temporarily to an area and work which would not suffer because of the employee's problem, and in the event this cannot be done, the employee should be sent home with pay, providing this does not become a recurring problem.

I hope you find these ideas helpful.

(Mrs. A.) Vikki Schiller

DS10
DS09
add:

Ellis Merschhoff
5650 NL

8208300278 820824
PDR PR
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...dged by card... 8/27/82 emp