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ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
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September 30, 1982

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

DOCKET NUMBER **27**  
PROPOSED RULE **PR-50**  
**(49 FR 33980)**

Dear Sir:

SUBJECT: Proposed Rule on Fitness for Duty - Federal Register

Generally, we agree with and support the intent of the proposed rule 10 CFR 50.22, "Fitness for Duty". It is in the best interest of the Nuclear Industry to insure that all persons who are granted unescorted access to the protected area of a nuclear power plant comply with the intent of the proposed rule. While the proposed rule is vague on exactly how fitness for duty is to be ensured, the nuclear industry has had programs for this purpose since its beginning. Programs vary from plant to plant, as each strives to adopt methods suited to its own facilities. This is desirable and would certainly continue under the proposed rule.

The Baltimore Gas and Electric Company uses several different methods to insure fitness for duty at its Calvert Cliffs plant. Security personnel and supervisors are trained to recognize the symptoms of impairment. Psychological screening techniques are used to identify aberrant behavior patterns. Upon evaluation of those behavior patterns, certain persons may be denied unescorted access to vital areas. Periodic searches are conducted by trained dogs to seek out illegal substances. Strict employee policies are maintained regarding drug and alcohol abuse on and off the job. Close ties are maintained with federal, state, and local authorities to aid in combating the drug problem where it is found. Finally, a rehabilitation program is available for those who have personal problems including alcoholism, drug addiction, and stress, as well as others.

Through the programs listed above the Baltimore Gas and Electric Company is taking positive steps to protect the security of Calvert Cliffs Nuclear Power Plant. Critics cite a substantial increase in the number of licensee/contractor arrests or terminations in the last three years for drug abuse. Based on this evidence drug abuse at nuclear facilities is presented as a worsening problem. This fails to recognize the increased number of workers and visitors entering nuclear plants during the last three years. More importantly the increased effectiveness of our ever expanding security program is not considered. Unless adjustments for both these factors are included, the results are inconclusive.

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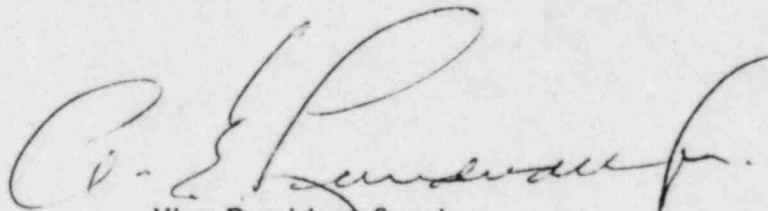
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Adoption of the proposed rule would not enhance our current program, but could result in pressure to adopt methods not endorsed by the Baltimore Gas and Electric Company, such as breath and urine tests. Such methods would be viewed as an invasion of employee privacy and would be a serious blow to worker morale and management/labor relations.

One questionable provision of the proposed fitness for duty rule is the exclusion of NRC personnel from its requirements. Certainly, NRC employees are subject to the same stresses and pressures which contribute to alcoholism and drug abuse in the rest of the population. No group should be exempt from the fitness for duty rules which would govern the nuclear industry. Whether or not the fitness for duty rule is applied to all personnel, or to all personnel except representatives of the NRC, the Baltimore Gas and Electric Company will continue to apply a single and consistent policy to all who are granted unescorted access to the protected areas of our nuclear power plants.

In conclusion, and even though the fitness for duty rule is short and broadly worded, it is unnecessary. Adequate programs already exist to assure fitness for duty in the nuclear industry. Moving authority to the federal level will not serve to improve this effort and will probably detract from it.

**BALTIMORE GAS AND ELECTRIC COMPANY**



C. E. Lunsford  
Vice President-Supply

AEL/DWL/JRS/sjb