

To: Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

DOCKETER  
USNRC

Attn: Docketing and Service Branch

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From: Daniel M. DeGroot  
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DOCKET NUMBER  
PROPOSED RULE PR-50

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

(47 FR 33980)

Dear Sirs,

I read with interest the NRC's proposed rule concerning 'Fitness for Duty'. First, let me say that I understand your concern and motivation of the proposed rule. However, the proposed rule itself is, to put it bluntly, totally absurd and outrageous. The methods by which daily (or weekly or monthly, ect.) certification of fitness for duty are attained are extremely unjust, constitute an extreme invasion of privacy, will add enormous amounts of operating costs to the licensee (and ultimately the consumer), and will drive more people out or away from this business. It is hard enough now trying to hire and maintain good, competent employees. Who wants to work somewhere that will require you to submit a urine sample, a blood sample, a breath test, and/or take a psychological/ physical screening each day prior to being allowed to go to work???? I also get the impression that the NRC believes its personnel are infallible by not making this rule applicable to them! NRC personnel are 'only human' and, as such, are subjected to the same types of stress, fatigue, physical and mental impairments that plant employees endure, and, as such, must be made to adhere to the same regulations it proposes for the industry it regulates.

The background investigation, behavioral observation programs, employee awareness programs, and employee assistance programs offer the most reasonable to the problem, and as such, I feel these are the areas that should be explored, especially when considering "fairness to and due process" for the employees.

I thank you for considering my comments and look forward to the outcome of this matter.

Sincerely,

*Daniel M. DeGroot*

Daniel M. DeGroot

cc: Commissioner Victor Gilinsky  
Commissioner John F. Aherne  
Commissioner Thomas M. Roberts  
Commissioner James F Asselstine  
Chairman Nunzio J. Palladino

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add: Ellis Merschhoff  
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9/28/82 emp  
Acknowledged by card.....