



Pennsylvania Power & Light Company

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OCT 07 1982

John C. Hoyle
Acting Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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USNRC

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON PROPOSED FITNESS FOR DUTY RULE
ER 100450 FILE 841-11
PLA-1324

Docket No. 50-387
50-388

Dear Mr. Hoyle:

The Pennsylvania Power & Light Company (PP&L) does not believe adoption of the proposed change to 10CFR50.54 (Fitness for Duty Rule) is necessary. Many utilities already have programs in place that accomplish the intent of this proposed rule. Specifically, PP&L has instituted a strong multi-faceted personnel security clearance program and a continual behavior observation program. PP&L believes that these programs provide reasonable assurance that drug abuse and other undesirable behavior characteristics can be readily identified and addressed.

However, if the NRC does adopt this proposed rule, please consider the following comments:

1. As written, the rule can be interpreted to require daily certification that each individual with unescorted access privileges is not unfit for duty. This would require a deliberate, specific administrative action to accomplish. PP&L proposes that the concept be changed to an "exception" approach. That is, people should be assumed fit for duty unless there is evidence to the contrary. This is in agreement with our present process in place at Susquehanna.
2. Utilization of items such as breath tests for fitness criteria may tend to be interpreted as an invasion of privacy and may generate serious union problems.
3. Since the licensee is ultimately responsible for safety and security, no one should be exempted from the fitness for duty rule. There is no reason to believe that persons not employed by the utility with unescorted

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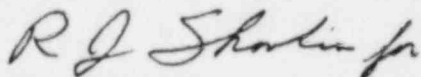
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access privileges (such as Federal inspectors) are immune to having problems with alcohol or drug abuse, or to developing mental or physical impairments. Therefore the rule should be changed to include all persons with unescorted access privileges.

Very truly yours,



N. W. Curtis
Vice President-Engineering & Construction-Nuclear

DPM/mks