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ULNRC

DONALD F. SCHNELL
VICE PRESIDENT

October 13, 1982
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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ULNRC-591

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Attention: Docketing and Service Branch

DOCKET NUMBER
PROPOSED RULE PR-50

(47 FR 33980)

Dear Sir:

The purpose of this correspondence is to provide comments on the Proposed Rule, 10 CFR Part 50.21(b) or 10 CFR 50.22, "Personnel With Unescorted Access to the Protected Areas: Fitness for Duty", published in the Federal Register, Vol. 47, No. 151, August 5, 1982.

Comment 1

As pursuant to Commissioner Gilinsky's request, we feel that the proposed rule should also apply to NRC personnel, granted unescorted access.

Comment 2

The requirements of the rule should be no more prescriptive than a requirement to have station security and supervisory personnel trained in the recognition of symptoms of personnel under the influence of controlled substances or alcohol or otherwise unfit for duty. The rationale for this comment is that more active means of determining fitness for duty relative to use of controlled substances such as breath analyzer test, blood or urine samples, are totally impractical for use as point-of-entry controls. Further, these unconventional methods of detection would further degrade employee morale levels, and adversely affect recruiting efforts in an industry already in a serious manpower shortage.

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DSD
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5650 WL

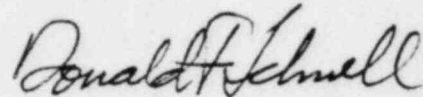
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Comment 3

The proposed rule appears to be inconsistent with recent rule-making and regulatory positions on the background investigations and psychological testing requirements for granting unescorted access.

Very truly yours,



Donald F. Schnell

LJT/bjp