

4601 North Fairfax Drive
Suite 1001
Arlington, VA 22203



DOCKET & RETURN to
K. PERKINS

Telephone (703) 522-6272

Fax: (703) 522-4585
USNC

EMPLOYEE ASSISTANCE PROFESSIONALS ASSOCIATION, INC.
(formerly ALMACA, Inc.)

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DOCKET NUMBER
PROPOSED RULE PR 55
(55 FR 14288)

OFFICE OF SECRETARY
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HEALTH

40

COMMENTS

TO

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF THE SECRETARY

10 CFR PART 55

RIN 3150-AD 55

OPERATORS' LICENSES
PROPOSED RULE

JULY 2, 1990

PRESENTED BY

THOMAS J. DELANEY, JR., CEAP
EXECUTIVE DIRECTOR

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President, Thomas J. Pasco, CEAP, UAW-General Motors Human Resources Center—Auburn Hills, Michigan
Vice President (Operations), Thomas Cagney, CEAP, Health Matters—Pleasanton, California
Vice President (Administration), Donald W. Magruder, CEAP, Anheuser-Busch Companies, Inc.—St. Louis, Missouri
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Treasurer, Pat Patrick, Union Pacific Railroad Co.—Houston, Texas
Immediate Past President, Gary Atkins, CEAP, Lockheed Missile and Space Company—Sunnyvale, California
Staff Executive Director, Thomas J. Delaney, Jr., CEAP/Associate Director, Judith O. Evans

DS10

July 2, 1990

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Services Branch

Re: Operators' Licenses

Dear Mr. Secretary:

The Employee Assistance Professionals Association (formerly known as ALMACA, hereafter referred to as EAPA) is the non-profit, international professional membership association, representing individuals and organizations in the Employee Assistance Program (EAP) profession. EAPA was created in 1972 and presently has over 6300 members and 72 chapters. It is governed by a voluntary Board of Directors with a staff and office in Arlington, Virginia. The current President is Dr. Thomas Pasco, CEAP, of UAW-General Motors Employee Assistance Program.

The association's membership represents most of the cumulative industry efforts to address workplace mis-use and abuse of alcohol and other drugs. As the spokesperson for these respective members, I would like to comment on the Nuclear Regulatory Commission's Proposed Rule. Specifically, the rulemaking proposes to amend 10 CFR Part 55, licensed operator requirements.

It is the opinion of EAPA that this regulatory initiative clearly attempts to confront concerns about public health and safety, and I commend the Commission for taking a proactive stance concerning substance use and abuse in the workplace. It is the experience of EAPA members that alcohol and other drug problems, which exist in all American industries, are best dealt with by implementing a comprehensive employee assistance program. It is in this context that EAP professionals can best confront and rehabilitate valued employees with job performance problems, and simultaneously protect public health and safety interests.

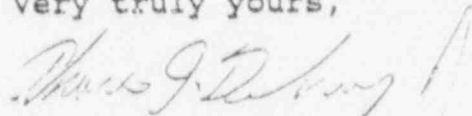
We have found that EAP professionals have extensive experience and success assisting individuals with personal problems, and recommend the Commission include the following elements, which are enclosed, within their procedures: EAPA Program Standards and Core Technology, which include constructive confrontation and progressive discipline techniques. These policies are in addition to licensee fitness-for-duty programs, return-to-work and medical review policies.

We have found that concern for job security motivates many individuals with personal problems, to contact the EAP for assistance in resolving these problems. The EAP professional is an expert in performing alcohol, drug and other related assessments, and in making effective referrals within the community. The EAP professional can also provide comprehensive case management services and will track the individual through the entire rehabilitation process, including re-integration into the workplace. Through these and other activities such as supervisory training and employee education about the use and abuse of drugs and alcohol, the EAP is well equipped to intervene on behalf of the workplace before an employee's personal problems escalate out of control.

We urge the Commission to use this model in developing a mechanism for the procedures identified to adopt this proposed rule. By working with EAPA and nuclear power licensees in the future, the Commission could develop practical guidelines that would provide consistency of reporting requirements among licensees. In addition to these guidelines, nuclear industry EAP professionals have commented that a comprehensive evaluation mechanism for reported operators would be more equitable. This mechanism would also provide these professionals with the power to reinforce existing Commission and licensee policies, and promote the development of effective return-to-work policies and rehabilitation programs.

We appreciate the opportunity to publicly respond to the content of the proposed rule. If you have any questions pertaining to these comments please contact Thomas J. Delaney, Jr., Executive Director, EAPA (522-6272).

Very truly yours,



Thomas J. Delaney, Jr., CEAP
Executive Director

Enclosures

- 1) EAPA Core Technologies
- 2) EAPA Draft: Program Standards
- 3) EAPA Continuum of Services