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Dear Sirs:

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

This letter is in response to your prospective regulation concerning "fit for duty" determination. I am in training for an RO license here at Diablo Canyon.

By administrative procedure as well as Company policy, it is the responsibility of the Shift Foreman to determine his crew's fitness for duty. The same applies to other departments and shops.

It seems to me that if there is a problem with drug use at nuclear plants, it stems from lack of effort on management's part, either because they don't want to lose productivity by sending someone home, or they don't care.

If this regulation is enacted, it still would not curb the use at the plant, but merely those persons already unfit to work prior to coming to work. It makes more sense to me that the foremen should be reminded of the importance of determining their workers' fitness and utilizing the power to send them home.

It surprised me that this prospective regulation is in response to only twelve violations over one year. This regulation would have more of a negative effect than a positive one, just judging by the reactions of anger of people I know when they read it. I would recommend that you reconsider your course of action.

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Acknowledged by card. 9/15/82 emp