

NANTeL

Generic Fitness-for-Duty and Behavior Observation Content Document



Effective Date

June 2021

The purpose of this document is to provide the content that a student sees when taking this course. This document satisfies the requirements of the American Nuclear Insurers for being able to reproduce historical content for the course.

This document can also be used at a site for purposes of creating study guides or lesson plans as required by individual site procedures.

Revision History*

Rev. #	Reason for Revision	Updated by:
November 19, 2016	Revised for HHR implementation	B. Wood
June 8, 2017	Incorporated Student and Industry Feedback	B. Wood
June 2021	Added page on cannabidiol in chemical testing section	Warren Prince

Course Objectives

You must pass a written exam to pass this course. You should be able to perform the following on the exam:

1. State methods used to implement the basic Access Authorization (AA) and Fitness-for-Duty (FFD) requirements for all workers who have unescorted access to the Protected Area, assigned duties at the Technical Support Center or Emergency Operations Facility in support of the emergency plan, or FFD administrative personnel.
2. Recognize the personal and public health and safety hazards associated with the abuse of legal and illegal drugs and alcohol.
3. Identify the Employee Assistance Program (EAP) services available to the individual.
4. State the effects prescription drugs, over-the-counter drugs, dietary factors (e.g., food products such as poppy seeds or hemp oil).
5. State the roles and responsibilities of the Medical Review Officer (MRO) and the Human Resources, FFD, and EAP staffs in the FFD program.
6. State individual roles and responsibilities under the Access Authorization and Fitness-for-Duty program.
7. Recognize indicators of or precursors to aberrant behavior and that behavior may change quickly.
8. Recognize illegal drugs and indications of the illegal use, sale or possession of drugs.
9. Describe BOP techniques for detecting and reporting performance degradation, impairment, or changes in individual behavior including work performance, social interactions, personal health, other observed behavior concerns (e.g., expressions of hatred or intent to harm the public) and known illegal off-site activities.
10. Recognize behaviors and report adverse to the safe operation and security of the facility including an unusual interest in or predisposition towards security and/or involvement in operations activities outside the normal work activities' scope.
11. State individual responsibility and process for handling and reporting behavioral problems and Fitness-for-Duty concerns and other activities that could impact an individual's trustworthiness and reliability.
12. State the supervisor's role and responsibilities under the Access Authorization and Fitness-for-Duty program.
13. Describe the procedure for the timely removal of a potentially untrustworthy or unreliable person from the Protected Area.
14. State the individual's responsibility and process for referral to the Employee Assistance Program.
15. State the individual responsibility to report all legal actions that could impact an individual's trustworthiness and reliability.
16. State the symptoms of worker fatigue and contributors to decreased alertness in the workplace.
17. State the contributors to worker fatigue.

18. State the contributors to circadian variations in alertness and performance.
19. State shift work strategies for obtaining adequate rest.
20. State the NRC-mandated sanctions with regard to FFD program violations.
21. State the role of the Reviewing Official in the processing of FFD concerns.
22. State the indications and risk factors for common sleep disorders.
23. State the effective use of fatigue countermeasures.
24. State individual rights regarding the Access Authorization and Fitness-for-Duty program.
25. State the potential adverse effects on job performance of prescription and over-the-counter drugs, alcohol, and dietary factors.

1.2 WIFM

Why Take This Training?

You have probably read or heard news stories over the years about what happens when people abuse drugs and alcohol on the job. Accidents happen. People get hurt.

Now, imagine if any of these people were working on a critical task associated with a nuclear power plant. The consequences could be severe.

This is why federal law (10 CFR 26 & 10 CFR 73.56) requires nuclear plant personnel to report to work free from the effects of illegal drugs and alcohol, not be under the influence of any substance, legal or illegal, or be mentally or physically impaired from any cause which in any way adversely affects their ability to safely and competently perform their duties.

The law requires that the nuclear power plant provide reasonable assurance that there is early detection of people who are not fit; who are fatigued or exhibit a degraded alertness, who are impacted by dietary factors, or who are exhibiting illness or mental stress, all of which affect an individual's abilities to safely and competently perform their duties. The laws require the nuclear power plant to manage such conditions commensurate with maintaining public health and safety.

Because of the unique nature of nuclear power, workers must be trustworthy, reliable and fit for duty to do their jobs safely at all times.

1.3 Course Menu

This course is divided into the following seven sections:

- Introduction
- Drugs and Alcohol
- Stress, Illness, and Fatigue
- Individual Responsibilities
- Supervisor Responsibilities

- Employee Assistance Program and Behavioral Observation Program
- Chemical Testing

2. Introduction

2.1 *Station vs Non-Station*

Please read and acknowledge the below.

I acknowledge that this course is designed primarily for those individuals who work at and/or have duties related to a nuclear power plant. I recognize that, although most information is generic in nature, the content and examination material in some instances is focused on the nuclear power plant environment and activities that support that environment. I understand that if I am not working at a nuclear power plant, there may be different actions required for my position. In all instances, there are specific company policies and procedures that must be complied with and if different than this training or I have a question, it is my responsibility to contact my supervisor or the FFD Program Administrator for clarification.

2.2 *Introduction*

Each nuclear utility is required to establish an Access Authorization (AA) and Fitness-for-Duty (FFD) program. Everyone with unescorted access authorization (UAA) or unescorted access (UA) must be trained and re-tested yearly. The requirements of this program and the consequences for violating those requirements apply for all individuals who are required to be covered under 10CFR26 and 10CFR73.56.

This lesson covers the importance of being fit for duty and what is expected of you as part of the program.

Specifically, you will learn about the factors that affect fitness-for-duty; the potential consequences of substance abuse; the drug and alcohol testing process; and how to identify and respond to behavior observations.

Unusual, questionable, or aberrant behavior on or off-site that may adversely affect plant operations or the safety or security of a licensee facility or contribute an unreasonable risk to the health and safety of employees, the public, or the common defense and security, including a potential to commit radiological sabotage.

This training also applies to:

- All individuals with Unescorted Access Authorization (UAA) and all individuals granted unescorted access (UA) and Decommissioned Reactors (with spent fuel in the spent fuel pool) and Independent Spent Fuel Storage Installation facilities;
- Licensee, vendor, or contractor personnel required to physically report to a facility's Technical Support Center (TSC) or Emergency Operations Facility (EOF) in accordance with Emergency Plans and Procedures;
- All individuals responsible for administration of the Access Authorization Program activities and Fitness For Duty Testing Program activities; and
- Critical group individuals.
- Supervisors of the above categories.

2.3 Implementing the Fitness-for-Duty Program

Implementing the Fitness-for-Duty Program

The fitness-for-duty program is implemented using a chemical testing program, behavioral observation program, and an Employee Assistance Program (EAP). Throughout this course, you will learn specifics of each of these components of the fitness-for-duty program.

There are many people who have responsibility for implementing the program. Click on each of the people on the screen to see what their role is.

You: Each individual is responsible for coming to work fit for duty and watching for behaviors in others that might indicate a fitness-for-duty or trustworthiness or reliability concern. You will learn more about your responsibilities throughout this course.

EAP: The Employee Assistance Program provides support and counseling to workers dealing with fitness-for-duty concerns.

HR: The Human Resources staff serves as the confidential communication link between

Security and the Company employees for Access and Fitness-for-Duty issues and must notify Security when an individual is terminated “for cause” so an evaluation concerning the individual’s trustworthiness and reliability can be completed.

MRO: The Medical Review Officer is the licensed physician who evaluates all test results and identifies any issues associated with collecting and testing specimens, and advises and assists program management in planning and overseeing the FFD program.

FFD Staff: The FFD staff conducts all chemical testing. They oversee and/or collect and process specimens and notify management of test results.

SAE: The Substance Abuse Expert is an individual who makes the determination of fitness in accordance with 10 CFR 26 requirements.

Supervisor: Supervisors are responsible for observing behavior and immediately reporting any concerns that arise

Each site has specific policies and procedures for implementing these programs. Be sure you are aware of these requirements and your role in implementing the Fitness-for-Duty program.

2.4 Defining Fitness-for-Duty



An individual is fit for duty when he or she is not impaired mentally or physically in any way that could interfere with safe, competent job performance.

Impairment could be caused by any of the following:

- substance abuse
- mental stress
- illness (physical or mental)
- fatigue
- prescription and over-the-counter drugs
- alcohol
- dietary factors

NOTE: Marijuana, is still Federally illegal and not allowed under the licensee's program, whether or not obtained legally in a state that has legalized the possession of marijuana or from the issuance of a valid marijuana prescription.

2.5 Substance Abuse

When people think of substance abuse, they usually think of illegal drugs. Of course you may not buy, use, or keep illegal drugs either on or off company property. But illegal drugs are only part of the picture.

Alcohol, prescription drugs, over-the-counter drugs, and other chemicals are legal, but they can easily be abused. Never take someone else's prescription drugs and don't abuse your own.

Even when taken properly, legal drugs can affect your job performance. They can impair your vision, cloud your thinking, and slow your reflexes. Tell your supervisor if you are taking any medications that could affect your ability to work safely or cause impairment.

2.6 Substance Abuse and Society

Substance abuse, including alcohol, prescription and non-prescription drugs, and illegal drugs, can increase the chances of something bad happening.

Statistics for automobile accidents, worker absenteeism/injury, and worker compensation claims are much higher when substance abuse is involved. Imagine putting that risk into your daily work routine at a nuclear power plant.

For example, substance abusers use 3 times as many sick benefits as non-abusers and are absent from work twice as often.

2.7 Knowledge Check

Knowledge Check

Drag the green boxes and drop them on the description of the function of that person, then click the "Submit" button.

<div style="border: 2px solid green; border-radius: 10px; background-color: #38761d; color: white; padding: 5px; margin-bottom: 10px;"> Substance Abuse Expert </div>	<div style="border: 1px solid gray; padding: 5px; margin-bottom: 10px;"> provides support and counseling to workers dealing with fitness-for-duty concerns. </div>
<div style="border: 2px solid green; border-radius: 10px; background-color: #38761d; color: white; padding: 5px; margin-bottom: 10px;"> Employee Assistance Program </div>	<div style="border: 1px solid gray; padding: 5px; margin-bottom: 10px;"> makes the determination of fitness in accordance with 10 CFR 26 requirements. </div>
<div style="border: 2px solid green; border-radius: 10px; background-color: #38761d; color: white; padding: 5px; margin-bottom: 10px;"> Medical Review Officer </div>	<div style="border: 1px solid gray; padding: 5px; margin-bottom: 10px;"> notifies Security when an individual is terminated "for cause" so an evaluation concerning the individuals trustworthiness and reliability can be completed. </div>
<div style="border: 2px solid green; border-radius: 10px; background-color: #38761d; color: white; padding: 5px;"> Human Resources </div>	<div style="border: 1px solid gray; padding: 5px;"> evaluates all test results and identifies any issues associated with collecting and testing specimens </div>

Drag Item	Drop Target
Human Resources	notifies Security when an individual is terminated "for cause" so an evaluation concerning the individuals trustworthiness and reliability can be completed.
Medical Review Officer	evaluates all test results and identifies any issues associated with collecting and testing specimens
Employee Assistance Program	provides support and counseling to workers dealing with fitness-for-duty concerns.
Substance Abuse Expert	makes the determination of fitness in accordance with 10 CFR 26 requirements.

2.8 Summary Introduction

Introduction Summary

- Each nuclear utility is required to establish an Access Authorization (AA) and Fitness-for-Duty (FFD) program.
- An individual is fit for duty when he or she is not impaired mentally or physically in any way that could interfere with safe, competent job performance.
- Each individual is responsible for coming to work fit for duty and watching for behaviors in others that might indicate a fitness-for-duty or trustworthy or reliability concern.
- The Medical Review Officer is the licensed physician who evaluates all FFD test results
- The FFD staff conducts all chemical testing
- The Employee Assistance Program provides support and counseling to workers dealing with fitness-for-duty concerns
- The Human Resources staff serves as the confidential communication link between Security and the Company employees for Access and Fitness-for-Duty issues
- The Substance Abuse Expert is an individual who makes the determination of fitness in accordance with 10 CFR 26 requirements
- Statistics for automobile accidents, worker absenteeism/injury, and worker compensation claims are much higher when substance abuse is involved.

3. Drugs and Alcohol

3.1 Drugs and Alcohol

The following screens will introduce you to the types of substances that are most often abused.

You will learn the physical signs of people who are abusing them and how to recognize when a drug sale might be happening.

Some of the drugs which are illegal under federal, state, or local laws include, among others, marijuana, heroin, hashish, cocaine and hallucinogens. Depressants, stimulants, and other controlled substances not prescribed for current personal treatment by an accredited physician also fall under this rule.

Drugs can have a significant impact on job performance. Those individuals using drugs, alcohol or other chemicals can have:

1. Impaired judgment and vision
2. Changes in reflexes; and
3. Reduced analytical ability

Common substances that may be used are cannabis, depressants (including alcohol), narcotics, stimulants, and hallucinogens.

3.2 Drug Dealers



Is one of these people a drug dealer?

There is no stereotypical description of a drug dealer. Because drugs can be hidden in the smallest of places and anyone could be a dealer, it is important that you recognize any indication that a drug deal is being made.

Often these indications are behaviors that appear normal in the workplace. An example is that deals can be done with a quick handshake where the drug is passed during the handshake.

Pay attention to anyone who appears nervous, as if hiding something. If you suspect that drugs are being sold, used, or kept on company property, report this to Security

immediately. The following pages will help you recognize the signs of alcohol and drug abuse.

3.3 Recognizing Illegal Drugs

Photos of various drugs shown on this page as a lead in to 3.4.

3.4 Physical and Behavioral Characteristics of Drugs

Which of the following is an illegal drug?



Correct	Choice	Feedback
	Chinese mushrooms 1	Incorrect. These are Chinese mushrooms used primarily in cooking.
	basil seeds 1	No, these are dried basil seeds.
	thyme 1	No, this is dried dill, a common herb.
	headache powder 1	Incorrect. These are headache powders available at any pharmacy or convenience store.

blue pill 2

These are non-prescription sinus tablets, and when used according to directions, have no harmful side effects.

All of these pictures are of common items used in daily life and none of them are illegal. As you can see, it is almost impossible to tell by looking if anything is illegal or prohibited at work.

3.5 Physical and Behavioral Characteristics of Drugs

You are not being trained to tell what drug a person may be abusing since many physical symptoms are similar to many drugs. What you should be able to do is to recognize changes in a person's behavior that may be the result of substance abuse. While it is important that you are aware of physical signs of potential substance abuse, *it is more important that you are able to recognize behavioral changes because these could lead to injury, accident, or plant equipment damage.*

Click on the buttons for each of these drug types to see:

- *Physical signs - These are things you can see that may indicate use of the substance*
- *Behavioral signs - These are observable changes in a person's behavior*

Cannabis

Uses: Relaxes mind, reduces pain

Examples: Hashish, hashish oil, and marijuana

Physical signs:

- rolling papers
- pipes
- dried green plant material
- odor of burnt hemp rope
- marijuana cigarette clips
- bloodshot eyes
- wide pupils

Behavioral signs:

- euphoria
- disorientation
- lowered inhibitions
- increased appetite

Depressants

Uses: Relieves anxiety, irritability, tension, and insomnia

Examples: Alcohol, barbiturates, Valium, Quaaludes, and some over-the-counter medications

Physical signs:

- capsules, pills, and tablets
- alcoholic beverage containers in unusual places
- bloodshot, watery, or glazed eyes
- alcohol odor on breath or clothes
- hangovers

Behavioral signs:

- slurred speech
- disorientation/confusion
- loud talking
- exaggerated motions
- lowered inhibitions
- sleeping longer

Narcotics

Uses: Reduces pain, treats insomnia

Examples: Opium, heroin, codeine, morphine, and paregoric

Physical signs:

- needle marks on arms or hidden locations
- needles/syringes
- spoons

- narrowed pupils, droopy eyelids
- cold, moist skin

Behavioral signs:

- euphoria
- drowsiness
- nausea

Stimulants

Uses: Treats narcolepsy, obesity, and hyperactivity in children

Examples: Cocaine, amphetamines (speed), methamphetamines, caffeine, nicotine, and some diet pills

Physical signs:

- capsules, pills
- white powder or chunks
- glass vials, pipes
- razor blades
- spoons, straws
- weight loss
- narrow pupils

Behavioral signs:

- increased alertness, excitation
- euphoria
- irritability, anxiety
- mood swings
- risk taking, overconfidence
- loss of sleep or appetite
- hyperactivity

Hallucinogens

Uses: Distorts perception of reality

Examples: LSD, phencyclidine (PCP), mescaline, and psilocybin

Physical signs:

- capsules, tablets
- “microdots”
- blotter squares
- dried mushrooms, cacti

Behavioral signs:

- blank stare, rapid eye movement
- delusions, hallucinations
- poor coordination or perception of time, distance
- flashbacks

3.6 Summary Drugs and Alcohol

- There are many different kinds of drugs. Mainly, they depress or stimulate the mind and body.
- Some drugs can distort a person’s perception of reality.
- Alcohol has the same effects as other types of depressants.
- You can usually see physical and behavioral signs of drug use.
- Physical signs of drug use can be misleading
- Look for changes in behavior
- Drug dealers can come from all walks of life.
- Drug deals can happen quickly and anywhere.
- Drugs can have a significant impact on job performance including:
 - Impaired judgment and vision
 - Changes in reflexes; and
 - Reduced analytical ability

4. Stress and Fatigue

4.1 Introduction

Prescription and Over-the-Counter Drugs, Mental Stress, Dietary Factors, Illness, and Fatigue

In this section you will learn about the effects of mental stress and physical and mental illness on your ability to work safely.

You will also learn about fatigue, including the different types of fatigue, what causes it, how to recognize it, and how to manage it.

4.2 Prescription and Over the Counter Drugs

Prescription and over-the-counter drugs can have a significant impact on job performance. The effects may include:

- Impaired judgment
- Impaired vision
- Changes in reflexes
- Reduced analytical ability

In addition to drugs, many dietary supplements or food items can affect your job performance or on chemical test results. Be sure you understand the effects of these dietary supplements, which may include:

- An impact on the testing for chemicals (drug tests)
- An unanticipated affect on the body when consumed in large doses
- May contain hidden alcohol or codeine
- Read labels or consult your physician

4.3 Mental Stress

Occasional stress is normal. It can be caused by many factors including family, finances, and work.

When stress occurs over a long period of time, it is called chronic stress. This can affect the quality of day-to-day living and job performance.

Signs of stress can include the following:

- increased irritability
- depression
- chronic fatigue
- overreacting
- impulsiveness

- alcohol or drug abuse
- constant worry

4.4 Physical and Mental Stress

When you are sick, you can't do your best work. Symptoms such as headaches, nausea, body aches, congestion, and fever make it hard to focus on the task at hand.

Medications used to treat illnesses can also affect your performance. Be sure you understand how a medication will affect you before taking it. Always follow the directions, and never take someone else's prescription drugs.

Tell your supervisor if an illness you have or medication you are taking might affect your ability to work safely or cause impairment.

If you bring medications to work, you must keep them in the original containers.

4.5 Fatigue

Fatigue is a common health complaint that can affect anyone. It is generally defined as a lack of energy; it can also include drowsiness or apathy.

Fatigue impairs both mental and physical capabilities. Often, workers are unaware that fatigue is causing poor job performance.

Everyone is expected to manage the factors that contribute to fatigue in their daily lives. Take action to maintain alertness at work. Recognize and seek treatment for sleep disorders that might create fatigue or make it worse.



4.6 Types of Fatigue

Acute: Builds up normally within one waking period. Acute fatigue might occur after a long, hard day at work.

Cumulative: Builds up from getting too little sleep between major waking periods. Newborn babies often cause cumulative fatigue in their parents.

Chronic: Caused by weeks or months of cumulative fatigue. Symptoms include the following:

- apathy
- loss of short-term memory or concentration
- muscle pain
- multi-joint pain without swelling or redness
- headaches of a new type, pattern, or severity
- exhaustion more than 24 hours after exercise



4.7 Physical Signs of Fatigue

There are many ways to recognize when you or others are fatigued. Usually, the appearance of the fatigued person will alert you to know something is out of the normal. The following signs are examples of what to look for:

- sleepiness
- yawning
- red eyes
- irritability, annoyance
- difficulty with concentration
- slower reaction time
- low energy
- apathy
- increased errors

4.8 Contributors to Fatigue

Fatigue can be caused by many factors:

- hard physical activity
- long work periods, commutes
- shift work
- changing or rotating work schedules
- lack of rest during work breaks
- sleep/work schedule that conflicts with normal body rhythms
- sleep disruption
- little exercise
- poor diet
- environmental conditions (high temperature, low light, background noise, etc.)

4.9 Task Contributors

Tasks with the following characteristics are likely to contribute to decreased alertness and to increase worker fatigue:

- repetitive
- high demand for focus
- requirement to stay in one place or position for a long time
- limited social interaction

Take precautions when doing tasks like these. Precautions include taking frequent breaks to prevent fatigue and using human performance tools to prevent error.

4.10 Circadian Variations

Circadian Variations

Your ability to remain alert and perform well is affected by natural changes in your body. These changes, called “circadian variations,” follow a daily pattern. The body’s high

energy point is late in the day and the low energy point comes in the hours before dawn.

Humans are naturally designed to be awake during the day and to sleep at night. Disrupting the normal schedule can cause poor sleep quality, which can lead to fatigue. This often happens with workers on shift and night work.



4.11 Disrupting the Schedule

When the body has adapted to a certain schedule, changing it can lead to fatigue. Activities such as variable work schedules, crossing time zones or long hours of being awake can disrupt the body's normal circadian variations. This can reduce alertness and degrade performance in many ways, such as the following:

- sleepiness while driving
- reduced attention and poor decision-making while monitoring equipment
- a wide range of performance problems that could affect plant safety

4.12 Sleep Disorders

Adequate sleep is essential to prevent fatigue. When deprived of sleep for too long, the human brain can force the body to fall asleep.

A common example of this occurs while driving long distances early in the morning or late at night, when your eyelids get “heavy.” It is never safe to continue with critical tasks if you are deprived of sleep.

Sleep apnea and insomnia are common disorders that can result in going without sleep for a long time. Several factors can contribute to these disorders:

- stress
- illness
- improper diet (caffeine, alcohol)
- medications

4.13 Preventative Strategies

Preventive strategies are used before work and during rest periods. They address the physical causes of fatigue to minimize sleep loss. Here are a few examples:

- good sleep habits
- sufficient rest
- effective use of days off and rest periods
- proper consumption of food, alcohol, caffeine, and medications
- correct timing of exercise

These strategies can be especially helpful in preventing the sleep disruptions that are normally caused by shift and night work schedules.

4.14 Countermeasures at Work

Fatigue countermeasures are actions taken on the job and at home to fight fatigue. They can help improve workplace performance and alertness.

In general, countermeasures do not address the underlying causes of fatigue. Instead, they enhance alertness and performance temporarily so that safety and efficiency are maintained.

Examples of fatigue countermeasures that may be useful on the job include the following:

- social interaction like having a conversation with co-workers
- physical activity such as stretching and isometric exercises
- Strategic caffeine consumption can be used to help get through periods of increased fatigue



4.15 Countermeasures at Home

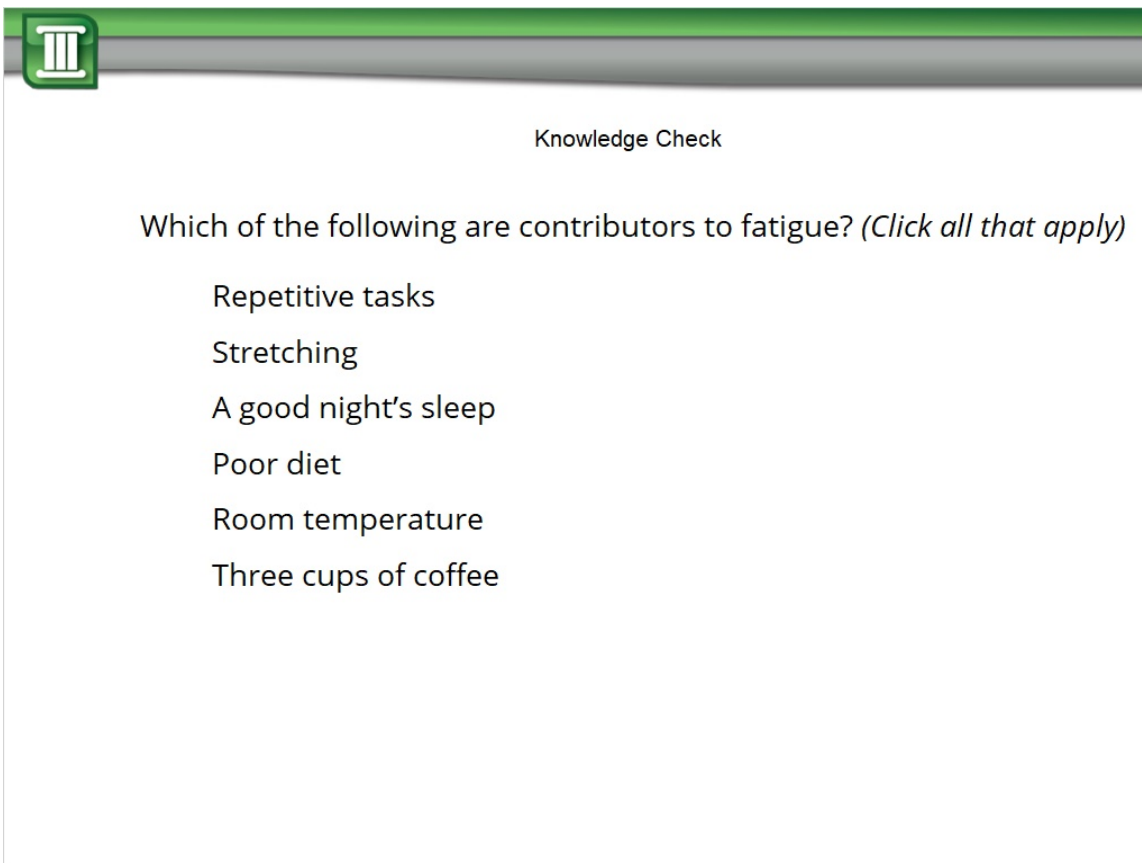
Consuming well-balanced meals-nutritious snack foods (be cautious of carbohydrates which may cause a “sugar high” followed by a low that can cause decreased alertness.)

Examples of countermeasures that may be used at home include:

- Adequate sleep/minimizing Sleep loss
- Providing a good sleeping environment
- Napping
- Establishing anchor sleep period
- Be mindful of impact of medications
- Understanding the affects of food, alcohol and exercise on sleep

4.16 Knowledge Check

(Pick Many, 10 points, 2 attempts permitted)



The image shows a screenshot of a knowledge check interface. At the top left, there is a green icon of a classical building. The title "Knowledge Check" is centered at the top. Below the title, the question is "Which of the following are contributors to fatigue? (Click all that apply)". The options listed are: Repetitive tasks, Stretching, A good night's sleep, Poor diet, Room temperature, and Three cups of coffee.

Correct	Choice
X	Repetitive tasks
	A good night's sleep
X	Room temperature
	Three cups of coffee
X	Poor diet
	Stretching

4.17 Summary Prescription and Over-the-Counter Drugs, Mental Stress, Dietary Factors, Illness, and Fatigue

- Mental stress, illness, and fatigue can impair your job performance.
- Fatigue can be acute, cumulative, or chronic.
- Circadian variations are the natural high and low energy patterns in daily life. These patterns cause us to prefer being awake during the day and sleeping at night.
- Anything that disrupts the normal sleep/wake pattern (such as shift work) can cause fatigue.
- Preventive strategies are used before work and during rest periods to help prevent fatigue.
- Fatigue countermeasures are things you can do on the job and at home that help keep you alert.
- Prescription and over-the-counter drugs can impair judgment, vision, reflexes and analytical ability all which can impact job performance.
- Dietary factors can impact testing for chemicals, have an unanticipated impact on the body when taken in large doses, and may contain hidden alcohol or codeine.

5. Individual Responsibilities

5.1 Individual Roles and Responsibilities

After completing this section, you will understand your individual responsibilities under the FFD program.

You will learn about the expectations to come to work free of alcohol, other substances and fatigue and to report anything in your history that reflects on your trustworthiness.

Your responsibility to report any conditions that might affect your own or someone else's fitness-for-duty will also be covered.

5.2 Arriving Fit for Duty

Every worker is responsible for arriving at work fit for duty and helping maintain a workplace free of the affects of alcohol and drugs.

According to FFD policies, you must abstain from alcohol at least five hours before arriving at the licensee's facility for a scheduled work shift. This time may need to be longer (depending on your size and the amount of alcohol consumed) because five (5) hours may not be sufficient time for alcohol to leave an individual's body.

In addition, you must not consume alcohol during your period of duty.

Remember that any violation of FFD policy can result in denial of your unescorted access authorization.

5.3 Unscheduled Call Outs

If you receive an unscheduled call-out, you must advise the caller of any of these conditions:

- you have consumed alcohol within the past five hours
- you are under the influence of alcohol
- you are not fit for duty for any reason such as fatigue, mental stress, or illness

If you are called to work and have consumed alcohol within five hours from the time you received the call, report for alcohol testing before accessing the plant.

5.4 Report Your History

Reporting Your History

Follow plant procedure to self-disclose to the proper personnel if you have ever been denied unescorted access, had any FFD policy violation including testing positive for a chemical substance, or participated in a substance abuse treatment program involuntarily.

If you become involved in any of the following situations, report them to your supervisor, security Access Authorization, or other designated individual:

- A formal action taken by law enforcement authority or court of law
- Any incident that may impact your trustworthiness and reliability



You are only required to report foreign travel during your initial background check and during any subsequent background checks. Failure to report this information could result in the denial of your unescorted access.

What is a Legal Action?

Legal action is a formal action by a law enforcement authority or court of law including, but not limited to, being held, detained, taken into custody, charged, arrested, indicted, fined, forfeited bond, cited, or convicted for a violation of any law, regulation or ordinance.

This includes felony, misdemeanor, serious traffic offenses, serious civil charges or military charges and the mandated implementation of a plan for treatment or mitigation in order to avoid a permanent record of an arrest or conviction in response to the following activities:

- Use, sale or possession of illegal drugs
- Abuse of legal drugs or alcohol
- Refusal to take a drug or alcohol test

Minor misdemeanors such as parking tickets or minor civil actions such as zoning

violations or minor traffic violations such as moving violations when the individual was not physically taken into custody and a court appearance was not required, do not require reporting.

All alcohol or drug legal actions, however, must be reported.

5.5 Issues Affecting Your Performance

Report medications, prescriptions and over-the-counter, that you feel impact your alertness or judgment, or that might affect your ability to perform your job function.

Tell your supervisor if you are:

- Taking any medications that may affect your performance or cause impairment
- Experiencing any significant personal problems such as stress, illness, or fatigue
- Receiving help for any problems that may affect your fitness-for-duty

Note that you are not required to identify the specific medication to the supervisor.

Immediately contact your supervisor if you experience any side effects while taking medications.

5.6 Behavioral Problems in Others

Notify your supervisor, Security, Access Authorization, or FFD personnel if you notice any of the following in others:

- strange or changing behaviors that could eventually affect public health and safety
- use, sale, or possession of illegal drugs or alcohol on the job
- indications that a co-worker may not be fit for duty
- visitor behavior that could affect your ability to perform tasks as an escort

Do not try to diagnose the behavior. Your primary responsibility is to prevent actions that could be harmful to the individual, other workers, or plant safety.

5.7 Unusual Behaviors

Workers should report any unusual behaviors on or off-site that could pose a threat to the safety or security of the plant, could be a warning sign of workplace violence or question an individual's trustworthiness and reliability.

Examples include:

- suspicious behaviors that relate to plant access and security
- frequent unexplained absences
- statements of desperation involving family, financial, or personal problems
- threats toward other workers or towards the nuclear facility (direct or indirect)
- an expression of hatred toward other workers or the utility
- over reaction, defensiveness, outbursts, mood swings, irritability
- credible information of or engagement in or conspiracy to commit a serious criminal activity

If you observe unusual behavior, do not confront the individual. Report it immediately to a supervisor or security personnel.

Suspicious behavior examples:

- activities outside of worker's normal job scope which could be seen as suspicious or posing a threat to people or property
- strange responses when asked about being someplace outside the normal work area
- unusual interest in testing of the plant facilities, buildings, infrastructure, or cyber security
- watching closely or taking pictures/video of frequently used access points, personnel performing security functions, or security related equipment
- possession of unusual quantities of cell phones, pagers, fuel, explosives, etc.
- using false insignia, documents, and/or identification to misrepresent one's affiliation
- Burglary, armed robbery, manslaughter, murder, assault, domestic violence, embezzlement, theft, terrorist activity or known terrorist association and efforts to recruit others to commit a crime

5.8 Designated Individuals

Each utility identifies people to receive FFD concerns. This always includes supervisors and the Reviewing Official, and can also include other members of the plant staff.

If you have FFD concerns, report them to one of these designated individuals according to your station procedure.

5.9 Exercise

Check the correct response and then click the "Check Answer" button.



Chuck, I know you're off duty, but I need you to come in.



Gee, I just had a beer with dinner.

I had a beer about an hour ago so I'm not fit for duty.

- Okay, I'm on my way. Try again.
- I can be there in a couple of hours. Try again.
- I had a beer about an hour ago, so I'm not fit for duty.

Correct. You must let the caller know if you have consumed alcohol within the last five hours.

5.10 Exercise

Knowledge Check

Check the correct response and then click the "Check Answer" button.



I need to try to get an invitation to the next party. Try again.

I need to let our supervisor know.

Correct. If you notice worker behaviors that you feel might affect their ability to work safely, you must inform a supervisor.

As long as he isn't hurting anything, I guess it's okay. Try again.

5.11 Summary Individual Responsibilities

- Every worker must report to work fit for duty.
- You must abstain from alcohol at least five hours before coming to work, maybe longer depending on your size and other factors.
- Your blood alcohol level can affect your fitness-for duty status
- If you are called in for unscheduled work, you must tell your supervisor if you are not fit for duty for any reason.
- You must report anything in your history that reflects on your trustworthiness (such as legal actions).
- Watch for strange or changing behavior in others and report it appropriately.
- Know the correct individuals designated by your station to receive FFD concerns.

6. Supervisor Responsibilities

6.1 Introduction

Supervisors and individuals acting in a supervisory role have additional responsibilities in the FFD program.

This section describes the expectations for supervisors to observe, document, and manage behavioral issues.

6.2 Observing and Documenting Behavior

Managers and supervisors are in the best position to become familiar with and observe worker behavior patterns over time and notice changes that might be cause for concern. For this reason, they are required to watch for behavior changes in their assigned workers as well as among the general workforce.

Documentation is an important part of a long-term observation process. Supervisors should record facts as they occur and maintain detailed documentation. This helps create accurate records that are vital when addressing the cause of a problem.

6.3 Addressing Questionable Behaviors

A supervisor's responsibility is to recognize when behaviors may be contributing to a job performance decline or call into question an individual's trustworthiness or reliability. Catching the decline in its early stages allows for a prompt and constructive response.

If a supervisor suspects someone is unfit for duty or exhibits questionable behavior, the supervisor should immediately report the concern to Security as well as to the appropriate supervisor, the Access Authorization staff, or the FFD staff. The individual should be relieved of duty if appropriate.

If possible, the supervisor should ask another supervisor or utility employee to act as a witness.

6.4 Conducting Annual Reviews

At a minimum managers and supervisors must complete an annual supervisory review for any individual who held unescorted access for 365 consecutive days.

The review is normally conducted by the individual's immediate supervisor. Licensee procedures will identify exceptions to this requirement and occasions when a supervisory interview may be required. The annual supervisory review, then, is based on interactions during the review period and covers the following:

- occasions when the employee behaved in an unusual manner
- circumstances that indicate the individual should be referred for an additional medical or psychological review
- observations or reports about changes in normal behavior

These evaluations are provided to a reviewing official to determine any additional action needed regarding the individual's trustworthiness, reliability, and fitness-for-duty.

6.5 Acting on Suspicions

Take immediate action to remove access to the Protected Area if you feel a worker's behavior could cause safety or trustworthiness and reliability problems. If you suspect substance abuse, arrange for the appropriate drug testing.

If an individual's actions may present a danger to himself or others, or risks the safety of the site, intervene immediately. Do not delay taking action by trying to diagnose the problem.

If safety is not threatened, request another supervisor or other utility employee to observe the behavior.

If the worker continues to show signs of behavioral problems, contact the Access Authorization and/or FFD Program staff for further analysis of the behaviors.

6.6 Reporting Illegal Drugs and Alcohol

Notify Security immediately if you suspect that illegal drugs or alcohol are being sold, used, or kept on site by a worker.

If possible, get another individual to validate your observations and assist in securing the area. Keep the suspected individual(s) under observation at all times until the searches and interviews are complete.

After the incident, write down everything that happened. Include statements, dates, times, witnesses, and relevant facts.

Notify your management of the incident as soon as possible.

6.7 Dealing with Hostility

People can get hostile when confronted about their behavior. This could lead to injury or plant damage.

If you feel an encounter might become physical, request that Security is present to assist with the situation. Wait for Security to arrive and then ask the individual to explain his behavior.

If the individual refuses chemical testing or appears threatening, prevent the individual from going into the Protected Area.

6.8 Exercise

Knowledge Check

Check the correct response and then click the "Check Answer" button.



✓ That was strange. I better tell his supervisor about that outburst.

Correct. if you notice worker behaviors that you feel might affect their ability to work safely, you must inform the appropriate supervisor.

✗ He doesn't report to me. There's nothing I can do. Try again.

✗ He's just blowing off steam. No big deal. Try again.

6.9 Exercise

Knowledge Check

Check the correct response for you as a **supervisor** and then click the "Check Answer" button.



✘ No, it wouldn't be fair to others. Try again.

✔ Is there anything the EAP could help with?

Correct. Supervisors should encourage employees to use the EAP when there are indicators of personal issues affecting performance.

✘ Sure, just make up the time later. Try again.

6.10 Summary Supervisor Roles

- Supervisors must observe the behavior of their own assigned workers as well as the general workforce.
- It is important to document all behavioral issues thoroughly.
- Behavioral problems are best caught and reported in the early stages of decline.
- An annual supervisory review is conducted for all individuals who held unescorted access for 365 consecutive days.
- If a supervisor does not have sufficient interaction with the individual, then the supervisor may need to conduct an interview of the individual to gather information to complete the Annual Supervisory Review.

- Immediate action should be taken to remove a worker's access to the Protected Area if his or her behavior presents a risk to plant safety.
- Contact Security if you feel an encounter could become physical.

7. EAP

7.1 EAP Introduction

Employee Assistance and Behavior Observation

On the following screens you will learn about the services available from the Employee Assistance Program (EAP).

You will also learn about the Behavior Observation Program (BOP) and how to recognize aberrant behavior. These behaviors are commonly seen by noticing changes in personal health, social interaction, and work performance.

All persons trained in BOP techniques should be able to recognize and report aberrant individual behavior that could lead to acts detrimental to health and safety of the public or the common defense and security.

It is each individual's responsibility to prevent actions that could be harmful to the individual, other workers, or plant safety. Escorts must be sensitive to the escorted individual's behavior for indications of aberrant behavior.

7.2 Employee Assistance Program

The Employee Assistance Program (EAP) evaluates workers for issues about their fitness-for-duty. The program offers assessment, short-term counseling, and treatment monitoring for a variety of issues such as stress, family relationships, depression, job burnout, death/dying, financial concerns, and compulsive behaviors such as gambling and overeating.

You may request help from the EAP (self-referral) or your company can refer you.

Federal law requires EAP to notify your management, even if you are a self-referral, and if the EAP staff concludes that your behavior:

- creates a hazard to yourself or others
- has ever engaged in an previously unreported significant FFD program violation, or
- if you have been impaired while in a work status and have a continuing substance abuse disorder that makes it likely that you would continue to be impaired in a work status in the future

7.3 Behavior Observation Program

Management uses the Behavior Observation Program (BOP) as its primary tool for monitoring continued trustworthiness and reliability of workers required to be covered under the program. This includes behaviors that:

- indicate impaired personal functioning that could lead to low performance or dangerous situations
- suggest the individual is purposely trying to jeopardize plant safety or operations

The BOP focuses on identifying and managing behaviors in four basic areas:

- drug and alcohol abuse
- behaviors that could result in legal actions
- behaviors adverse to the safe operation and security of the facility
- other behaviors that create a risk to the health and safety of the public or the common defense and security

7.4 Aberrant Behavior

Aberrant behavior is any behavior that is not “normal” for an individual.

Most people behave in a consistent manner. As you become familiar with your co-workers, you can determine what behavior is normal for them.

Changes in normal behavior can occur quickly and can result from many causes, such as health, work, or family problems. These changes are normal when they happen occasionally and don't last long. But sometimes, the changes persist and get worse.

7.5 Signs of Aberrant Behavior

Aberrant behavior can be displayed in many ways, including the following:

- inflexibility
- impulsiveness
- memory loss
- feelings of persecution, fear, or paranoia
- conversations with imaginary people or animals
- hearing voices, seeing visions, or smelling strange odors
- behavior that is dangerous, destructive, or inappropriate for the situation

Remember, behavior that is not normal for an individual is a sign that you should pay close attention to what that person is doing at work.

7.6 Types of Behavior changes

All individuals should be alert to any worker's unusual behavior and performance issues. These changes could be the result of alcohol or drugs, fatigue, dietary factors, illness and stress.

Changes can occur in several areas of our lives, such as the following:

- personal health
- social interaction
- work performance
- other observed behavior concerns

Personal health changes can be seen in a person's physical appearance or emotional state:

- very emotional
- shaking/twitching
- weight loss/gain
- sweating
- nausea/stomach aches
- frequent trips to the bathroom
- poor color, blue/gray around lips
- shortness of breath

- stumbling
- changes in grooming

Changes in how people interact with others can often reveal fitness-for-duty issues:

- avoids social contact
- holds grudges
- changes friends
- ignores co-workers
- complains frequently
- fights (verbal or physical)
- brags
- lies
- talks about suicide, disasters, hopelessness
- dominates conversations
- displays sexually inappropriate behavior

Performance changes can be seen in a worker's quality, attention to detail, adherence to policies, and cooperation with co-workers:

- works much faster or more slowly
- makes more mistakes
- steals or damages property
- breaks or 'bends' the rules
- forgets important things
- takes many or long breaks
- avoids part of the plant
- calls in sick frequently
- refuses to take direction
- refuses to give or receive help
- becomes overly cautious

7.7 Behavioral Observation Period

If you have not been part of the fitness-for-duty program and management has not had the opportunity to observe your behavior for more than 30 days, Security is required, at a minimum, to deactivate your badge. This allows management an opportunity to ensure that no behavior changes of concern have developed during that time.

If your badge is deactivated because of the 30 day period, you must meet all the fitness-for-duty program requirements prior to regaining access authorization.

Reference: 10CFR26.71(b)

7.8 Suspicious Circumstances

Report any suspicious conditions that could lead to unsafe plant operation, including:

- misaligned breakers or valves
- cut wires or cables
- foreign objects in machinery, reservoirs, or tanks
- inappropriate cuts or holes in pipes, tubes, or hoses
- damage to equipment that interferes with a safety or security function
- aircraft flying in an unusual manner

If you observe such activities on or off-site, report the observations in as much detail as possible to Security or the Access Authorization office. Observations of a seemingly minor nature have greatly assisted in the prevention of activities that could disrupt plant operations or impact the plant's overall security. "If you see something, say something"TM.

7.9 Knowledge Check

Knowledge Check

Q. Management is required to have your security badge de-activated if they have not observed your behavior in how many days?

- 14 days
- 21 days
- 30 days
- 60 days

Correct	Choice	Feedback
	14 day group	No. This is a short period. You could be on vacation for 14 days.
	21 day group	Incorrect.
X	30 day group	Correct!
	60 day group	Incorrect. This period is too long.

7.10 Summary EAP and BOP

- The EAP evaluates workers for FFD issues and provides counseling services.
- The BOP helps identify and manage behaviors that could jeopardize safety or security.
- Aberrant behavior is any behavior that is not normal for a particular individual.
- Aberrant behavior can be seen in changes to personal health, social interaction, work performance or other observed behavior concerns.
- All persons trained in BOP techniques are required to report aberrant or suspicious behavior or circumstances.

8. Chemical Testing

8.1 Chemical Testing Introduction

As a nuclear worker, you will be subject to chemical testing. This part of the lesson describes elements of the testing program that are important for you to know. They include the following:

- five types of chemical tests
- drugs you are tested for
- your right to privacy
- requirements for testing
- testing process, including how a positive result is determined
- effect on testing of legal drugs and food items
- role of the Medical Review Officer
- consequences required for violating FFD rules
- the purpose of validity testing

8.2 Types of Testing

Pre-access

Pre-access testing must be conducted before getting unescorted access or being assigned to an Emergency Operations Facility or Technical Support Center.

Random

All workers are subject to random testing any time they are at work, including weekends and holidays. Because the test is random, some workers might be tested more than others. If you are selected for a random test, your supervisor or point of contact will notify you of the scheduled test time. You may not miss a scheduled test anytime you are on site. You may not request time off once notified of the test.

For-cause

For-cause testing is done as soon as possible after a worker is seen behaving in a way that indicates possible substance abuse. A supervisor might also arrange for-cause testing after receiving any credible information that an individual is abusing drugs or alcohol

Post-event

A worker who commits an error that leads to an event (as defined by station procedure) will be given chemical testing if the event involves any of the following conditions:

- an illness or injury that meets OSHA recordable criteria within four hours after the event
- a radiation exposure or release of radioactivity that exceeds regulatory limits
- worker behavior that significantly degrades (actually or potentially) plant safety

An injury or illness meets the OSHA general recording criteria if it results in any of the following:

- death
- days away from work
- restricted work or transfer to another job
- medical treatment beyond first aid
- loss of consciousness

An illness or injury also meets the general recording criteria if it involves a significant injury or illness diagnosed by a physician or other licensed health care professional even if

it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

Follow-up

Follow-up testing is conducted for an employee whose authorization has been reinstated after an earlier positive test or when otherwise determined by a Substance Abuse Expert. Follow-up tests are unannounced, and serves to verify that the individual continues to be free from drugs and alcohol.

8.3 More on Chemical Testing

The chemical testing process will include validity testing for the following adulterants (substances added to samples to mask or alter test results):

- creatinine
- ph
- nitrites

The chemical testing process tests for the following substances:

- alcohol
- marijuana
- cocaine
- opiates
- phencyclidine (PCP)
- amphetamines and methamphetamines

8.4 Knowledge Check

Knowledge Check

Q. Which of the following tests are administered as soon as possible after a worker is seen behaving in a way that indicates possible substance abuse?

- Post-event testing
- Random testing
- For-cause testing
- Pre-access testing

Correct	Choice
	Post Event Group 1
	Random Group
X	For Cause Group
	Pre Access Group

8.5 Conducting the Tests

The FFD staff oversees and/or conducts all chemical testing. They collect and process the specimens, and notify plant management of test results under the direction of the Medical Review Officer.

Medications that are legally prescribed or purchased over the counter (such as aspirin or cold medicine) can cause a positive test result. Some foods, drinks, and dietary supplements (like poppy seeds, hemp products, energy drinks, and coco leaf) can also affect testing results.

Every effort is made to ensure that drug test analyses are accurate. The MRO explores possible causes for a positive test before confirming it. However, the MRO will not accept consumption of the above items as an explanation for a positive test result.

8.6 Special Note About CBD

CBD stands for cannabidiol. It is the second most prevalent of the active ingredients of cannabis (marijuana).

CBD supplements may contain varying amounts of THC (the active ingredient in marijuana), even if labeled "Does not contain THC."

The MRO may **not consider** consumption of food products, supplements, or other preparations containing substances that may result in a positive confirmatory drug test result, **including, but not limited to supplements containing hemp products as a legitimate medical explanation for the presence of drugs or drug metabolites. 10 CFR 26.185 (j)(5)**

As a result, the Medical Review Officer will verify a drug test confirmed at the appropriate cutoff levels as positive, even if the employee claims he or she only used a CBD product



8.7 Use a Questioning Attitude

It is important for all employees to have a good questioning attitude and be aware of what they consume (food, drinks, vitamins, and medication) and the possible side effects by reading labels and speaking to physicians.

For example, Kava Kava, found in health food stores and has been used as an over-the-counter “prescription” for stress relief, can make an individual appear impaired.

Discuss with your doctor if you have any questions prior to consuming medications or supplements that could or will impair your alertness, judgment, or ability to perform your job duties. And, as always, use your questioning attitude to ask appropriate questions and seek answers to your questions.

8.8 Right to Privacy

Personal information collected for the FFD program is only disclosed as required by procedure.

You have the right to visual privacy while reviewing the results of an alcohol test.

You have the right to individual privacy during the collection of a urine specimen except if a directly observed collection is required.

You have the right to privacy at the collection site unless any of the following conditions exist:

- at a previous collection you presented a specimen that was determined to be substituted, adulterated or invalid without a medical explanation for the result
- there is reason to believe that you will or you actually attempt to dilute, substitute, or adulterate your specimen
- the temperature of the specimen is abnormal, outside the normal range expected
- you have previously tested positive, which requires an observed collection before unescorted access authorization is granted

8.9 Compliance with Testing

Chemical testing is required for all workers who need unescorted access to a nuclear plant or perform certain supporting functions.

Refusal to test is considered a subversion of the testing process.

This includes any act, or attempted act, to refuse or subvert the testing process including, but not limited to:

- refusing to provide an adequate specimen or cooperate with the testing process
- failure to submit releases or other required documentation without alteration
- refusing to remove outer garments or show the collector the contents of the their pockets/compartments
- avoiding collection or not reporting for testing after being notified
- providing or attempting to provide a substituted or adulterated specimen as defined in 10 CFR 26.5 as a willful act to avoid being tested or to bring about an inaccurate drug or alcohol test result for oneself or others at any stage of the testing process
- presenting or attempting to present someone else's specimen
- adding or attempting to add a foreign substance to the specimen

Any of these actions will result in the immediate unfavorable termination of unescorted access and permanent denial of authorization thereafter.

8.10 Testing Procedure

Urinalysis will be used to test for all substances except alcohol. Anyone with a positive test result is considered unfit for duty.

Individuals with blood alcohol content (BAC) of 0.02 percent or greater are considered unfit for duty depending on how long the individual has been at work.

The initial alcohol test may be conducted using a breath specimen or oral fluid test.

A confirmatory breath test for alcohol will be conducted if the first test result is 0.02 percent or greater.

8.11 Confirming Test Results

The BAC level for a confirmed positive test depends on how long a worker has been on the job. The chart below shows the criteria. You have the right to appeal any positive test result and any sanctions taken against you. Appeals must be in writing to licensee management.

Blood Alcohol Content	Time at Work* (through test completion)	Test Result
0.04	Any	Positive
0.03	One hour or more	Positive
0.02	Two hours or more	Positive
Between 0.01 and 0.02	Three hours or more	Negative, but inform FFD management and remove worker from covered duty temporarily

* Includes all breaks, including rest, lunch, medical appointments, etc.

8.12 Exercise

Chris reports to work at 0700. At 0830 Chris is directed to report for random chemical testing. The testing is finished at 0905 and shows a confirmed BAC of 0.02 percent. Is this considered a positive test?

Because Chris had been at work for more than 2 hours at the conclusion of the test, 0.02 percent is a confirmed positive result.

8.13 Exercise

Terry reports to work at 0700. At 0930 Terry is directed to report for random chemical testing. The testing is completed at 1030 and shows a confirmed BAC of 0.015 percent. Is this considered a positive test?

Terry had been at work for more than 3 hours at the conclusion of the test, so 0.015 percent BAC is declared negative. However, FFD management must be notified and Terry must be removed from covered work activities.

8.14 Exercise

Pat reports for work at 0630. At 0700 Pat is directed to report for random chemical testing. The testing is completed at 0745 and shows a confirmed BAC of 0.03 percent. Is this considered a positive test?

Because Pat had been at work for more than 1 hour at the conclusion of the test, 0.03 percent BAC is a confirmed positive result.

8.15 Role of the MRO

The Medical Review Officer is the licensed physician who evaluates all test results including positive, adulterated, substituted, invalid and dilute and identifying any issues associated with collecting and testing specimens, and advises and assists program management in planning and overseeing the FFD program.

To ensure your privacy, you may have to provide medical information directly to the Medical Review Officer in some cases.

8.16 NRC Sanctions

The Nuclear Regulatory Commission (NRC) requires certain consequences for FFD violations.

The first violation must result in unfavorable termination of the individual's authorization for at least *14 days*.

Any attempt to subvert the testing process must result in immediate and *permanent*

termination of the individual's authorization.

Subverting the process includes, but is not limited to, the following:

- any act, or attempted act, to refuse or subvert the testing process including, but not limited to: refusing to provide an adequate specimen or cooperate with the testing process
- failure to submit releases or other required documentation without alteration
- refusing to remove outer garments or show the collector the contents of their pockets/compartments; avoiding collection or not reporting for testing after being notified
- providing or attempting to provide a substituted or adulterated specimen as defined in 10 CFR 26.5 as a willful act to avoid being tested or to bring about an inaccurate drug or alcohol test result for oneself or others at any stage of the testing process
- presenting or attempting to present someone else's specimen
- adding or attempting to add a foreign substance to the specimen
- violating drug and alcohol provisions of an FFD policy if access authorization was previously denied for five years

8.17 5 Year Sanctions

Certain acts require an unfavorable termination of access authorization for at least *five years*:

- a second confirmed positive test result (even during an assessment or treatment period)
- selling, using, or possessing illegal drugs or consuming alcohol in the Protected Area of a nuclear plant or while performing duties covered under the FFD program
- resigning or withdrawing an application for access authorization before it is terminated or denied for a first violation of the FFD policy involving a confirmed positive test result

8.18 Summary Chemical Testing

- There are five types of testing conducted at different times for different reasons: pre-access, random, for-cause, post-event, and follow-up.
- Your medical information will be kept private and only disclosed as required by procedure.

- You must comply with FFD testing to be included in the FFD and unescorted access authorization program.
- A confirmed positive test between 0.02 and 0.04 will be evaluated based on your blood alcohol content and the length of time you have been at work.
- Blood alcohol content between 0.01 and 0.02 are considered negative, depending on the time you have been at work. [Click here](#) to review how test results are handled.
- Legal drugs and some food items can cause a positive test result.
- The MRO is a licensed physician who reviews all positive test results.
- The NRC mandates minimum consequences for FFD violations.