



Fitness for Duty Programs

Electronic Reporting System

Drug and Alcohol Testing Information

Public Meeting - Webinar

June 29, 2011

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Webinar Administration

■ Opening Remarks

■ NRC staff in attendance

- Paul Harris, Senior Program Manager, Drugs & Alcohol
- Mike Boggi, Senior Program Manager, Fatigue
- Wayne Chalk, Security Specialist
- Will Smith, Security Specialist
- Phyllis Jenifer, Security Specialist
- Brian Zaleski, NRC contractor, ICF International

■ Category 2 public meeting

- NRC & industry discussion
- Specific periods for public comment
- NRC Public Meeting feedback form

Webinar Agenda

- **Background**
- **Single Positive Test & Annual Test Forms**
- **Industry feedback on current forms and process**
- **Discuss changes under consideration for CY 2011 and solicit industry feedback**
- **Two periods for public comment**

Authority & Requirements

Background

■ Authority

- 10 CFR Part 26.11, “Communications”

■ Reporting Requirements

- §26.717, Annual reporting
- §26.719, Event reporting
 - (b) Significant FFD policy violations/program failures
 - (c) 30-day reports

■ Joint NRC-Industry Initiative

- Voluntary e-reporting of FFD performance data
- Consistency, simplicity, clarity, & improved data analysis

Industry Use of e-Reporting

Background

	CY 2009	CY 2010 *	Change
Reporting Facilities	19	47	+ 28
Industry Participation	25%	63%	+ 38%
Tests Conducted by EIE reporting licensees	46,162	106,443	+60,281
Positive Results Reported	290	648	+ 358

* CY 2010 results draft

Issue Summary

Background

■ Previous Issues

- Electronic signatures
- Form field functionality (drop down menus/web browser)
- Single-use forms (specific to a licensee)
- Submission protocols and submission updates
 - EIE web portal
 - Licensee administration

■ What worked well for CY 2010?

- Transition to new “general submission” forms (same forms for all)
- Site use, administration, and completion of forms
- Use of NRC’s “General Submission” web portal
- “Validate & lock” signature feature
- No fatal flaw process or form usage issues

CY 2010 Form Issue Summary

Background

■ Special Characters (e.g., “ / %)

- Restricted use in text fields

■ Single Positive Test Form (SPTF)

- Some form fields “disappear” if entries were not provided and the form was saved and then reopened (e.g., “Test Type(s) for Results Reported”)
- “Submission Update” box form logic did not account for “new” prior year submission (e.g., a new positive test result identified for prior year)

■ Subversion Attempts

- Multiple forms issued for the same test
- Excessive effort to accurately communicate the subversion event
- Too many “Submission Updates” required
- Root cause: lack of NRC guidance

CY 2011 Form Improvements

completed or in progress

Form Improvements

■ SPTF and ATF forms

- Special characters (e.g., %, "") enabling more usage
- Form flow & layout to reflect "real-life" test processing & findings
 - "hiding" fields and "opening" fields when required

■ SPTF (majority of changes)

- Enhancement of subversion attempt reporting
- Additional auto-population of form fields and data validations
- Update mouse-over instructional pop-up guidance

■ ATF

- Reformatting of data reporting fields into a table format
- Laboratory and Blind Performance Test Sample supplier info

CY 2010 Reporting Observations

Background

- Discrepancies between positives reported in the Annual Test Form (ATF) and the SPTF
- Inconsistencies in subversion attempt reporting
 - Use of “For Cause” for the “Reason for Testing” for second specimen collection if initial specimen collected was out of temperature range
 - Use of “Substituted” or “Other/Invalid” result for “Test Validity” – not laboratory test results
 - Double reporting of subversion attempts (result for out of temperature range specimen – the initial specimen collected, result for second specimen collected under direct observation)

Proposed Changes

Annual Test Form

Form Improvements

■ “Reason for Testing” results

- Consolidate reporting fields (# of tests, # of positives) into a table

■ Identify and Communicate

- HHS-certified laboratories
- LOD testing policy
- Blind Performance Test Sample supplier(s)

■ Add Narrative Topic fields

- LOD testing
- Blind Performance test samples
- §26.717(c) LTF administrative actions

Proposed Changes (SPTF)

Form Improvements

■ Alcohol Testing

- Replace “Use NRC Cutoff (yes/no)?” with a time-dependent BAC level exceeded data block

■ LOD testing reporting

- If a “Dilute” is chosen for “Test Validity,” a new “yes/no” question will appear to report if LOD testing was conducted

■ Subversion attempt reporting

Replace checkbox choices with more explicit actions

- refused to provide a specimen
- specimen temperature (out of range)
- specimen characteristics (e.g., color, odor, precipitant)
- subversive paraphernalia

Proposed Changes

SPTF (continued)

Form Improvements

■ Update “Disciplinary Action” drop-down menu

- Align sanctions to current Part 26
- Clarify that a PADS entry =§26.75 sanction

■ Change “Reason(s) for the Action (select all that apply)” from checkboxes to drop-down menu.

Delete:

- MRO Confirmation
- Violation of 5-hour abstinence
- Resignation/withdrawal

SPTF & ATF Questions

■ Should we?

- SPTF - Replace “Use NRC Cutoff (yes/no)” for alcohol testing with a time-dependent BAC level exceeded?
- SPTF - Add “random pre-access” test , include in drop-down list for “Pre-Access Testing Reason (optional field)” - §26.55(a)(4)?

■ Should we eliminate?

- SPTF - Test Validity, “Other/Invalid,” this is not a reportable violation
- SPTF - 5 hour abstinence, this is not a reportable violation
- Most all references to “Other” categories (e.g., labor category)

■ Is this clear?

- SPTF - Was this collection refused (Yes/No)
- ATF - Narrative topic selections

SPTF & ATF

Detailed Walk Through w/ Questions and Answers

Annual Test Form

U.S.NRC
United States Nuclear Regulatory Commission
Electronic Information Exchange

Protecting People and the Environment

NRC FFD Program Performance Data Reporting System

Annual Reporting Form for Drug and Alcohol Tests for the EIE General Submission Portal

Report Period: **Date of Report (Read-only):**

Submission Update: Check this box only if this is an update to a previous submission.

PPD Program Random Testing Population: Check this box if some form fields may result in information being automatically populated.

Unique Reference Number (Licence/Employee):

Pre-Access Tests Conducted Throughout the Period:

Total number of tests conducted (Licensees/Employees)	Average number of contractors/vendors subjected to Part 26 throughout the period	Total size of the random testing pool throughout the period (Calculated)
<input type="text"/>	<input type="text"/>	<input type="text"/>

Followup Tests Conducted Throughout the Period:

Total number of tests conducted (Licensees/Employees)	Total number of tests conducted (Contractors/Vendors)	Total number of positive, adulterated, substituted, and refuse to test results
<input type="text"/>	<input type="text"/>	<input type="text"/>

For Cause Tests Conducted Throughout the Period:

Total number of tests conducted (Licensees/Employees)	Total number of tests conducted (Contractors/Vendors)	Total number of positive, adulterated, substituted, and refuse to test results
<input type="text"/>	<input type="text"/>	<input type="text"/>

Random Tests Conducted Throughout the Period:

Total number of tests conducted (Licensees/Employees)	Total number of tests conducted (Contractors/Vendors)	Total number of positive, adulterated, substituted, and refuse to test results	Average random testing percentage achieved for testing pool
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Post-Event Tests Conducted Throughout the Period:

Total number of tests conducted (Licensees/Employees)	Total number of tests conducted (Contractors/Vendors)	Total number of positive, adulterated, substituted, and refuse to test results
<input type="text"/>	<input type="text"/>	<input type="text"/>

Other Tests Conducted Throughout the Period:

Total number of tests conducted (Licensees/Employees)	Total number of tests conducted (Contractors/Vendors)	Total number of positive, adulterated, substituted, and refuse to test results
<input type="text"/>	<input type="text"/>	<input type="text"/>

Submissions Test:

Did your program only test for NRC-required substances AND at the NRC-specified minimum cutoff levels? (Yes / No)

Narrative (as applicable):

If you selected "No" for the above question, or if you have more than three narrative topics, select "Other(s)" for the Narrative Topic 1 to report any additional narrative topics. List each additional narrative topic title to be addressed in the "Please Elaborate" box. Ensure that each topic is identified and discussed in the "Narrative Text" box.

Narrative Topic 1: **Narrative Text:**

Add an additional Narrative Topic:

Persons(s) Responsible for Information Provided:

Person 1 (required):
 First Name: Last Name: Position Title: Email Address:
 Person 2 (optional):
 First Name: Last Name: Position Title: Email Address:

Note: NRC will consider this form a valid submission only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Validate & Lock:

Save to Local PC: **Print this Report:**

Annual Test Form Version 1.2.24

Single Positive Test Form

U.S.NRC
United States Nuclear Regulatory Commission
Electronic Information Exchange

Protecting People and the Environment

NRC FFD Program Performance Data Reporting System

Single Positive Test Form for the EIE General Submission Portal

Report Period: **Date of Collection (mm/yyyy):**

Submission Update: Check this box only if this is an update to a previous submission.

Unique Reference Number (Licence/Employee):

Reason for Testing - 26.717(b)(5):

Employment Type - 26.717(b)(3):

Please Select:

Labor Category - 26.717(b)(3):

Please Select:

Refusal - 26.717(b)(7) & 26.75: Was this collection refused (Yes / No)?

Test Results - 26.717(b)(4):

Test Validity:

Test Type(s) for Result(s) Reported:

Please Select:

Was this collection observed (Yes / No)? - 26.717(b)(3) & 26.1:

Substance - 26.717(b)(2) & (b)(4): **Additional Substance (as applicable):** **Additional Substance (as applicable):**

Please Select: **Please Select:** **Please Select:**

Use NRC Cutoff (Yes / No): **Use NRC Cutoff (Yes / No):** **Use NRC Cutoff (Yes / No):**

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b):

Subversion Attempts - 26.717(b)(7) and 26.75(b): If this result relates to a subversion attempt, list one or more of the following choices as applicable. If there were no attempts, do not select any of the four boxes.

Physical Evidence: **Observed Actions/Behaviors:**
 Refusal to Cooperate: **Other:**

Management Actions - 26.717(b)(6):

Individual Sanction:

Please Select:

Reason(s) for the Action (select all that apply):

MRO Confirmation First drug or alcohol positive Resignation/Withdrawal
 Suspension Second drug or alcohol positive Subsequent positive test result from testing
 Misuse Violation of 5-hour absence rule Other
 Sale, Use or Possession in PA

Person(s) Responsible for Information Provided:

Person 1 (required):
 First Name: Last Name: Position Title: Email Address:
Person 2 (optional):
 First Name: Last Name: Position Title: Email Address:

Note: NRC will consider this form an official submission only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Validate & Lock:

Save to Local PC: **Print this Report:**

Single Positive Test Form Version 1.2.24

Next Actions

- **Correct CY 2010 performance reports**
- **Issue the CY 2009 and 2010 Info Notices**
 - Initiative to place industry performance summary on the web
- **Turn off the “old” FFD-specific reporting portal**
- **Complete PII review of FFD performance reports**
- **Issue web-based e-reporting guidance**
- **Continue assessing industry and public needs**
- **Roll out the SPTF and ATF updates**
 - Next Meeting? August 31 (proposed)