TRAINING MATERIALS COVER SHEET

TITLE: Generic Fitness for Duty & Behavioral Observation Training

Document Type: Onlinelearning (Lesson Plan, Student Handout, Lesson Plan/Text, etc.)

Training Program: General Employee Training

Item ID (TIN): GT1295007 Rev #: 010

Rev Date: 04/09/2014 Rev Time: 1501

Prepared by: Mindy P. Sadowski Preparer

Reviewed by: [Signature] Technical Review Date: 4/9/2014

Approved by: [Signature] Training Program Review Date: 4/10/2014

Line Management Review, if applicable

Actions Complete: N/A Date: ________________

Training Editor
NANTeL “Generic Fitness-For-Duty and Behavioral Observation Training” Lesson Plan

Nantel
03/28/2014
INTRODUCTION

MODULE 1 SUBSTANCE ABUSE

1.1 The Players

1.2 Defining Fitness-for-Duty

1.3 Substance Abusers at Work

1.4 Substance Abusers in Cars

1.5 THINGS THAT AFFECT FITNESS FOR DUTY

1.5.1 Drugs and Alcohol

1.5.2 Drug Sales

1.5.3 Cannabis

1.5.4 Depressants

1.5.5 Narcotics

1.5.6 Stimulants

1.5.7 Hallucinogens

1.6 Review: Substance Abuse

MODULE 2 STRESS, ILLNESS, AND FATIGUE

2.1 Mental Stress

2.1.1 Illness

2.1.2 Fatigue

2.1.2.1 Types of Fatigue

2.1.2.2 Physical Signs of Fatigue

2.1.2.3 Contributors to Fatigue

2.1.2.4 Task Contributors

2.1.2.5 Circadian Variations

2.1.2.6 Disrupting the Schedule

2.1.2.7 Sleep Disorders

2.1.2.8 Preventive Strategies

2.1.2.9 Fatigue Countermeasures

2.2 Review: Stress, Illness, and Fatigue

MODULE 3 ROLES AND RESPONSIBILITIES

3.1 Individual Roles and Responsibilities

3.2 Arriving Fit for Duty

3.3 Unscheduled Call-Outs

3.4 Reporting Your History

3.4.1 Reportable Offenses

3.5 Issues Affecting Your Performance
3.6 Behavioral Problems in Others 20
3.7 Unusual Behaviors 20
3.8 Designated Individuals 20
3.9 Review: Individual Roles and Responsibilities 21

MODULE 4  SUPERVISOR ROLES AND RESPONSIBILITIES 23
4.1 Observing and Documenting 23
4.2 Addressing Behavioral Problems 23
4.3 Conducting Annual Reviews 24
4.4 Acting on Suspicions 24
4.5 Reporting Illegal Drugs, Alcohol 25
4.6 Dealing with Hostility 25
4.7 Review: Supervisor Roles and Responsibilities 26

MODULE 5  HOW THE FFD PROGRAM WORKS 27
5.1 Employee Assistance Program 27
5.2 Behavior Observation Program 27
5.3 Aberrant Behavior 28
  5.3.1 Signs of Aberrant Behavior 28
  5.3.2 Types of Behavior Changes 28
    5.3.2.1 Personal Health Changes 29
    5.3.2.2 Social Interaction Changes 29
    5.3.2.3 Work Performance Changes 30
5.4 Behavioral Observation Period 30
5.5 Review: EAP and BOP 31

MODULE 6  CHEMICAL TESTING 32
6.1 Types of Testing 32
  6.1.1 Initial Testing 32
  6.1.2 Random Testing 32
  6.1.3 For-cause Testing 33
  6.1.4 Post-event Testing 33
6.1.4.1 OSHA Recordable Criteria
6.1.5 Follow-up Testing

6.2 Conducting the Tests
   6.2.1 Substances Tested

6.3 Right to Privacy

6.4 Compliance with Testing

6.5 Testing Procedure

6.6 Confirming Test Results

6.7 Role of the MRO

6.8 NRC Sanctions

6.9 Five-Year Sanctions

6.10 Review: Chemical Testing
INTRODUCTION

Estimated Time to Complete: 2.0 Hours

Revision New

March 28, 2014

© Copyright INPO 2014. All rights reserved.

Each nuclear utility is required to establish a Fitness-for-Duty (FFD) program. Everyone with unescorted access to the Protected Area of the plant must be trained on this program and re-tested yearly. Others who don’t access the Protected Area but who staff emergency response facilities and FFD Program Personnel must also be trained.

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 chemical testing process; and how to identify and respond to behavioral problems.

Purpose

This lesson provides information about Access Authorization, Fitness-for-Duty, and Behavioral Observation Program requirements as outlined in the Code of Federal Regulations Part 26. The material meets the Nuclear Energy Institute’s generic objectives for training of all nuclear plant workers according to NEI 03-04 Revision 7, “Guideline for Plant Access Training.” Individual stations must supplement this generic training with additional site-specific training as required by NEI 03-04. Site-specific courses for each utility are available on NANTeL.

Instructions

Review each Module in sequence. If you have already been through the material already and need to work on a specific subject, go directly to that Module.

Once you have reviewed a Module, go through the Review questions. If you can’t answer a question or got one wrong, review the material again until you get it right without looking at the material.

Good luck!
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.

### 1.1 THE PLAYERS

**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 concern.

**Supervisor:**

Supervisors are responsible for observing behavior and managing any fitness-for-duty concerns that arise.

**EAP Counselor:**

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

**Medical Review Officer (MRO):**

The Medical Review Officer (MRO) is the licensed physician who evaluates all positive test results and is responsible for the administration of the FFD program.

**Human Resources:**

The Human Resources staff coordinates personnel actions associated with FFD policy violations.

**FFD Program Personnel:**

The FFD staff conducts all chemical testing. They collect and process specimens and notify management of test results.
1.2 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

1.3 SUBSTANCE ABUSERS AT WORK

Substance abusers have a much more negative effect on the world than do non-abusers.

- **Five** times as many Workers' Compensation claims
- **Two** times as many absences
- **Two** times as many mistakes
- **Three** times as many sick benefits
- **Four** times as many accidents

1.4 SUBSTANCE ABUSERS IN CARS

One area where substance abuse is most apparent is on the roads.

- Substance abusers cause 500,000 serious injuries from auto accidents each year.
- Half (50%) of all traffic accident deaths are due to substance abuse.
1.5 THINGS THAT AFFECT FITNESS FOR DUTY

This section addresses the different substances and physical factors that can impair your ability to work safely and competently.

1.5.1 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.

1.5.2 DRUG SALES

Drug dealers cannot be stereotyped. They come from all walks of life. Drug sales can occur anywhere and may take as little time as a handshake. All plant workers must be aware of places where drugs can be hidden:

- shoes
- pens, flashlights
- cigarette packs
- chewing tobacco packs
- headbands of caps, hard hats
- purses, briefcases, lunchboxes

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.

1.5.3 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

1.5.4 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

### 1.5.5 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
1.5.6 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

1.5.7 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

1.6 REVIEW: SUBSTANCE ABUSE
See how well you absorbed the material for this module. Put an X on the answer you think is correct and then look it up.

**Remember, there may be more than one answer!**

<table>
<thead>
<tr>
<th>Question</th>
<th>Possible Answer(s)</th>
<th>Done</th>
</tr>
</thead>
</table>
| M R O stands for | • Medical Review Officer  
• Medical Research Officer  
• Medical Return Option  
• Most Renounced Option |      |
| Substance abusers have a much more negative effect on the world than do non-abusers. Circle the answers that are incorrect. | • **Five** times as many Workers’ Compensation claims  
• **Six** times as many absences  
• **Two** times as many mistakes  
• **Three** times as many sick benefits  
• **Eight** times as many accidents |      |
| Half (30%) of all traffic accident deaths are due to substance abuse. | o **TRUE**  
| An example of a stimulant is Opium. | • chewing tobacco packs  
• rolling papers  
• hangovers  
• spoons |      |
| Alcohol is a | • Stimulant  
• Depressant  
• Hallucinogen  
• Narcotic |      |
| One behavioral sign of taking stimulants is... | • Flashbacks  
• irritability, anxiety  
• nausea  
• slurred speech |      |
In this section you will learn about the effects of mental stress and 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.

2.1 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

2.1.1 ILLNESS

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.

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

### 2.1.2.1 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
2.1.2.2 PHYSICAL SIGNS OF FATIGUE

There are many ways to recognize when you or others are fatigued. Look for the following signs:

- sleepiness
- yawning
- red eyes
- unusual blinking
- irritability, annoyance
- difficulty with concentration or higher-level mental functions
- slower reaction time
- memory problems
- low energy
- apathy
- feeling of isolation
- task fixation
- increased errors

2.1.2.3 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.)
2.1.2.4 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. Examples include taking frequent breaks to prevent fatigue and using human performance tools to prevent error.

2.1.2.5 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.

2.1.2.6 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
2.1.2.7 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

2.1.2.8 PREVENTIVE 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.

2.1.2.9 FATIGUE COUNTERMEASURES

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 countermeasures include the following:

- social interaction
- physical activity
- caffeine consumption

2.2 REVIEW: STRESS, ILLNESS, AND FATIGUE
See how well you absorbed the material for this module. Put an X on the answer you think is correct and then look it up.

**Remember, there may be more than one answer!**

<table>
<thead>
<tr>
<th>Question</th>
<th>Possible Answer(s)</th>
<th>Done</th>
</tr>
</thead>
</table>
| When stress occurs over a long period of time, it is called chronic stress. | ○ TRUE  
○ FALSE                                                 |      |
| Signs that a person may be fatigued are...                               | ● shift work  
● sleepiness  
● lack of rest during work breaks  
● increased errors                                 |      |
| The body’s high energy point is...                                       | ● late in the day  
● just before dawn  
● first hour at work  
● happy hour                                             |      |
| When a body has adapted to a schedule and then it is disrupted a sign of this might be reduced attention and poor decision-making while monitoring equipment. | ○ TRUE  
○ FALSE                                                 |      |
| Common disorders that can result in going without sleep for a long time are... | ● Sleep Apnea  
● Stress  
● Insomnia  
● Partying                                             |      |
| One way to counteract the effects of fatigue is...                       | ● effective use of days off and rest periods  
● physical activity  
● sleepiness while driving  
● effective use of days off and rest periods               |      |
In this module we will outline the roles and responsibilities under the FFD program.

### 3.1 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 and other substances 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.

### 3.2 ARRIVING FIT FOR DUTY

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

According to FFD policies, you must abstain from alcohol at least five hours before a scheduled work shift. This time may need to be longer (depending on your size and the amount of alcohol consumed) to ensure that your blood alcohol concentration (BAC) is less than 0.04 percent when you report for work.

If your BAC is 0.04 percent or greater, you are not fit for duty according to fitness-for-duty policies.

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

### 3.3 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 have consumed alcohol within the past five hours report for alcohol testing if you are called to work.
3.4 REPORTING YOUR HISTORY

Follow plant procedure to advise the proper personnel if you have ever been denied unescorted access, tested 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 and Security before entering the Protected Area:

- arrest/indictment
- criminal charges (excluding minor traffic or civil violations that doesn’t involve drugs/alcohol)
- any incident that may impact your trustworthiness

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.

3.4.1 REPORTABLE OFFENSES

Legal Actions must be reported to your supervisor, Security, Access Authorization, or other designated individual in accordance with site procedures. Typically, this is when the individual reports for the next work period after an incident. Failure to report formal actions taken by a law enforcement authority or court of law could result in denial of unescorted access.

Legal actions include, but are 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 do not require reporting unless they are alcohol or drug related.
3.5 ISSUES AFFECTING YOUR PERFORMANCE

Tell your supervisor if you are:

- taking any medications that may affect your performance
- 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 your supervisor.

3.6 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.

3.7 UNUSUAL BEHAVIORS

Workers should report any unusual behaviors that could pose a threat to the safe operation or security of the plant. There are some key things to look for:

- unusual interest in plant security
- operations activities outside a worker’s normal job scope
- frequent unexplained absences
- strange or inadequate response when asked about being someplace outside the normal work area
- unusual opinions that could imply a threat to a nuclear facility

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

3.8 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.

Select the proper response to the statement on the left:

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

See the answer at the end of the module!

3.9 REVIEW: INDIVIDUAL ROLES AND RESPONSIBILITIES

See how well you absorbed the material for this module. Put an X on the answer you think is correct and then look it up.

Remember, there may be more than one answer!
<table>
<thead>
<tr>
<th>Question</th>
<th>Possible Answer(s)</th>
<th>Done</th>
</tr>
</thead>
</table>
| According to FFD policies, you must abstain from alcohol at least two hours before a scheduled work shift. | ○ TRUE  
○ FALSE                                                                 |      |
| If your BAC is ____ percent or greater, you are not fit for duty according to fitness-for-duty policies. | • 0.02  
• 1.2  
• 0.04  
• 0.08                                                                 |      |
| You are stopped by police and asked to submit to a breathalyzer. You refuse to take the test. Should you report this to your work supervisor? | ○ YES  
○ NO                                                                 |      |
| One sign that a visitor is acting strangely is... | • strange or changing behaviors that could eventually affect public health and safety  
• unusual interest in plant security  
• taking any medications that may affect performance  
• Mumbling and speaking a foreign language                                                                 |      |
| The correct answer is 3. for 3.8 Designated Individuals |  |  |
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.

4.1 OBSERVING AND DOCUMENTING

Managers and supervisors are in the best position to observe worker behavior 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. This helps create accurate records that are vital when addressing the cause of a problem.

Records are also essential if discipline becomes necessary.

4.2 ADDRESSING BEHAVIORAL PROBLEMS

A supervisor’s responsibility is to recognize when behavior problems are causing job performance to decline. Catching the decline in its early stages allows for a prompt and constructive response.

If a supervisor suspects someone is unfit for duty, he should 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.
4.3 CONDUCTING ANNUAL REVIEWS

Managers and supervisors complete an annual review for any individual who held unescorted access for 365 consecutive days.

The review is conducted by the individual’s immediate supervisor. It 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 go to a reviewing official to determine any additional action needed regarding the individual’s trustworthiness, reliability, and fitness-for-duty.

4.4 ACTING ON SUSPICIONS

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

If an individual’s actions may present a danger to themselves 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 Employee Assistance Program staff to make a supervisor referral.
4.5 REPORTING ILLEGAL DRUGS, 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.

4.6 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.
### 4.7 REVIEW: SUPERVISOR ROLES AND RESPONSIBILITIES

**Remember, there may be more than one answer!**

<table>
<thead>
<tr>
<th>Question</th>
<th>Possible Answer(s)</th>
<th>Done</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee records are also essential if discipline becomes necessary.</td>
<td>○ TRUE</td>
<td></td>
</tr>
<tr>
<td></td>
<td>○ FALSE</td>
<td></td>
</tr>
<tr>
<td>If a supervisor suspects someone is unfit for duty, he should report the concern to.....</td>
<td>• FFD staff</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Director of the facility</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Local police</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Security</td>
<td></td>
</tr>
<tr>
<td>Managers and supervisors complete an annual review for any individual who.......</td>
<td>• held unescorted access for 365 consecutive days.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• held escorted access for 365 consecutive days.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• held unescorted access for 6 months.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• held escorted access for 365 days.</td>
<td></td>
</tr>
<tr>
<td>If the worker continues to show signs of behavioral problems, ......</td>
<td>• contact the Employee Referral Program staff to make a supervisor referral.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• contact the Employee Assistance Program staff to make a supervisor referral.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• contact security</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• try to determine the problem</td>
<td></td>
</tr>
<tr>
<td>If you suspect that illegal drugs or alcohol are being sold, used, or kept on site by a worker,....</td>
<td>• contact the Employee Assistance Program staff to make a supervisor referral.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• notify security immediately</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• notify the employee’s immediate supervisor</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• notify local police</td>
<td></td>
</tr>
<tr>
<td>If the individual refuses chemical testing or appears threatening,......</td>
<td>• prevent the individual from going into the Protected Area</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• notify security immediately</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• try to determine the problem</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• notify local police</td>
<td></td>
</tr>
</tbody>
</table>
MODULE 5

HOW THE FFD PROGRAM WORKS

In this module 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.

5.1 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 supervisor can refer you.

If the EAP staff concludes that your behavior creates a hazard to yourself or others, federal law requires them to notify your management, even if you are a self-referral.

5.2 BEHAVIOR OBSERVATION PROGRAM

Management uses the Behavior Observation Program (BOP) as its primary tool for determining trustworthiness and reliability of workers with unescorted access.

The BOP focuses on identifying and managing behaviors in three basic areas that could jeopardize safety:

- drug and alcohol abuse
- legal actions that result from worker behavior
- other behaviors that create a risk to the health and safety of the public
5.3 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.

5.3.1 SIGNS OF ABERRANT BEHAVIOR

Aberrant behavior can show up 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

5.3.2 TYPES OF BEHAVIOR CHANGES

Changes can occur in several areas of our lives. Each of these areas can be broken down into several additional types of changes:

- personal health
- social interaction
- work performance
5.3.2.1 PERSONAL HEALTH CHANGES

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

- very emotional
- bizarre or unusual ideas
- shaking/twitching
- weight loss/gain
- sweating
- nausea/stomachaches
- frequent trips to the bathroom
- poor color, blue/gray around lips
- shortness of breath
- difficulty sleeping
- stumbling
- changes in grooming

5.3.2.2 SOCIAL INTERACTION CHANGES

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, etc.
- dominates conversations
- plays pranks
- displays sexually inappropriate behavior
5.3.2.3 WORK PERFORMANCE CHANGES

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
- offers vague reasons for absence
- refuses to take direction
- refuses to give or receive help
- becomes overly cautious
- operates equipment carelessly

5.4 BEHAVIORAL OBSERVATION PERIOD

If management has not had the opportunity to observe your behavior for more than 30 days, Security may deactivate your badge. This allows management an opportunity to ensure that no behavior changes of concern have developed during that time.
<table>
<thead>
<tr>
<th>Question</th>
<th>Possible Answer(s)</th>
<th>Done</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Employee Assistance Program (EAP) evaluates workers for issues about their fitness-for-duty.</td>
<td>○ True&lt;br&gt;○ False</td>
<td></td>
</tr>
<tr>
<td>Management uses the BOP as its primary tool for determining trustworthiness and reliability of workers with unescorted access. What does BOP stand for?</td>
<td>• Behavior Option Program&lt;br&gt;• Belief Observation Program&lt;br&gt;• Behavior Observation Program&lt;br&gt;• Behavior Observation Process</td>
<td></td>
</tr>
<tr>
<td>You notice that a colleague is going to the bathroom frequently. This could be a sign of a...</td>
<td>• social interaction change&lt;br&gt;• work performance change&lt;br&gt;• personal health change&lt;br&gt;• weak bladder</td>
<td></td>
</tr>
<tr>
<td>A colleague that was always a quiet person suddenly becomes more combative and threatening. This could be a sign of a...</td>
<td>• social interaction change&lt;br&gt;• drinking alcohol&lt;br&gt;• work performance change&lt;br&gt;• personal health change</td>
<td></td>
</tr>
<tr>
<td>A normally reliable employee starts to call in sick frequently. This could be a sign of a...</td>
<td>• social interaction change&lt;br&gt;• work performance change&lt;br&gt;• personal health change&lt;br&gt;• fatigue</td>
<td></td>
</tr>
<tr>
<td>If management has not had the opportunity to observe your behavior for more than 45 days, Security may deactivate your badge.</td>
<td>○ True&lt;br&gt;○ False</td>
<td></td>
</tr>
</tbody>
</table>
As a nuclear plant 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

### 6.1 TYPES OF TESTING

Chemical testing prevents substance abuse at work and finds it when it occurs. There are five types of tests.

#### 6.1.1 INITIAL TESTING

Initial (pre-employment/pre-access) testing must be conducted within 30 days before getting unescorted access or being assigned to an Emergency Operations Facility or Technical Support Center.

#### 6.1.2 RANDOM TESTING

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.
6.1.3 FOR-CAUSE TESTING

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.

6.1.4 POST-EVENT TESTING

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 (below) 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

6.1.4.1 OSHA RECORDABLE CRITERIA

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.

6.1.5 FOLLOW-UP TESTING

Follow-up testing is conducted for an employee whose unescorted access has been reinstated after an earlier positive test. Follow-up tests are unannounced, which verifies that the individual continues to be free from drugs and alcohol.
6.2 CONDUCTING THE TESTS

The FFD staff 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. Inform your supervisor if you are taking any medications that might affect test results. Some foods and dietary supplements (like poppy seeds, hemp products, energy drink and coca leaf) can also affect testing results. The MRO will not accept consumption of these items as an explanation for a positive test result.

Every effort is made to ensure that drug test analyses are accurate. The FFD staff explores all possible causes for a positive test before confirming it.

6.2.1 SUBSTANCES TESTED

Chemical tests look for signs of the following substances:

- Amphetamines and Methamphetamines
- Phencyclidine (PCP)
- Opiates
- Cocaine
- Marijuana
- Alcohol

6.3 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.

6.4 RIGHT TO PRIVACY
Personal information collected for the FFD program is only disclosed as required by procedure.

You have the right to privacy at the collection site unless either of these two conditions exists:

- there is reason to believe that you will alter, substitute, or tamper with a specimen
- you have previously tested positive, which requires an observed collection before unescorted access authorization is granted
6.5 COMPLIANCE WITH TESTING

Chemical testing is required for all workers who need unescorted access to a nuclear plant. Refusing to comply with the program will have the same consequences as a positive test.

Failure to comply includes, but is not limited to, the following:

- refusing to provide urine specimens or submit to a breath test when required
- attempting to alter a specimen

6.6 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 0.04 percent or greater are considered unfit for duty.

The initial alcohol test may be conducted using a breath alcohol content or oral fluid test. A confirmatory breath test for alcohol will be conducted if the first test result is 0.02 percent or greater, depending on how long the individual has been at work.

6.7 CONFIRMING TEST RESULTS

The BAC level for a confirmed positive test depends on how long a worker has been on the job. The chart 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 (plant) management.

<table>
<thead>
<tr>
<th>Blood Alcohol Content</th>
<th>Time at Work* (through test completion)</th>
<th>Test Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.04</td>
<td>Any</td>
<td>Positive</td>
</tr>
<tr>
<td>0.03</td>
<td>One hour or more</td>
<td>Positive</td>
</tr>
<tr>
<td>0.02</td>
<td>Two hours or more</td>
<td>Positive</td>
</tr>
<tr>
<td>Between 0.01 and 0.02</td>
<td>Three hours or more</td>
<td>Negative, but inform FFD management and remove worker from covered duty temporarily</td>
</tr>
</tbody>
</table>
6.8 ROLE OF THE MRO

The Medical Review Officer (MRO) is a licensed physician with expertise in substance abuse disorders. The MRO has the appropriate medical training to evaluate all positive test results. When appropriate, the MRO will recommend individuals to the EAP.

The MRO is responsible for the overall administration of the FFD program.

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

6.9 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 access authorization for at least 14 days.

Any attempt to subvert the testing process must result in immediate and permanent termination of the individual’s access authorization.

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

- refusing to provide a specimen
- attempting to substitute or adulterate a specimen
- violating drug and alcohol provisions of an FFD policy if access authorization was previously denied for five years

6.10 FIVE-YEAR SANCTIONS

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

- a repeat 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
### 6.11 REVIEW: CHEMICAL TESTING

**Remember, there may be more than one answer!**

<table>
<thead>
<tr>
<th>Question</th>
<th>Possible Answer(s)</th>
<th>Done</th>
</tr>
</thead>
</table>
| All workers are subject to _____ testing any time they are at work, including weekends and holidays. | • initial  
  • for-cause  
  • random  
  • post-event |      |
| If a worker receives radiation exposure or release of radioactivity that exceeds regulatory limits they are subject to...... | • post-event testing  
  • initial testing  
  • for-cause testing  
  • random testing |      |
| A supervisor receives credible information that an individual is abusing drugs or alcohol. This will result in ______ testing of the individual. | • initial  
  • for-cause  
  • random  
  • post-event |      |
| Is testing for alcohol part of chemical testing?                         | ○ TRUE  
  ○ FALSE |      |
| Chemical testing is required for all workers who need _____ to a nuclear plant | • escorted access  
  • unescorted access  
  • access  
  • entry |      |
| Urinalysis will be used to test for all substances except amphetamines.  | ○ TRUE  
  ○ FALSE |      |
| The first FFD violation must result in unfavorable termination of the individual’s access authorization for | • at least one month  
  • permanently  
  • at least 14 days  
  • until reviewed |      |
| 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 will result in... | • termination of access authorization for at least **five years**  
  • termination of access authorization for at least **two years**:  
  • permanent termination of access authorization  
  • a review to determine restriction of access |      |