ANNUAL DRUG TESTING RATE OPTIONS FOR EMPLOYEES - PROS AND CONS

NRC's Drug-Free Workplace Plan currently stipulates an annual random drug testing rate of 50 percent for those in a testing designated position. Options for annual random drug rates are provided below:

Option 1: Testing rate of 25 percent.

Pro:

This option is the least costly. Resource requirements would be expected to increase by approximately $67K to handle testing of all applicants who have accepted positions with the NRC (approximately double the current workload) at all locations around the country, and to maintain the larger random drug testing pool. Testing costs remain essentially the same.

Cons:

1. This testing rate lowers the deterrent effect on illegal drug use for those in the random drug testing pool by reducing the probability of an individual being randomly selected during a one-year period to 22 percent.

2. This option utilizes a testing rate much lower than the testing rate imposed on the nuclear industry by Title 10 of the Code of Federal Regulations, Part 26 (10 CFR 26), "Fitness For Duty Programs."

3. This option would require software changes in the Employee Drug Testing and Tracking System (EDTTS) to implement the new rate. Total cost required to implement this option would be dependent on whether the current legacy system could be modified or if a new system would need to be developed.

4. Compared to the current practice, the highest risk employees (i.e., those that hold NRC Q security clearances), will be tested at the same rate as all other employees.

Option 2: Testing rate of 50 percent.

Pros:

1. This testing rate maintains the current deterrent effect on illegal drug use for those in the drug testing pool, i.e., probability of an individual being randomly selected during a one-year period is 40 percent.

2. This option is consistent with the testing rate imposed on the nuclear industry by 10 CFR 26.

3. This option is consistent with DOE's minimum testing rate of 50 percent of its employees in sensitive positions.

4. This option would not require software changes in EDTTS.

Cons:

1. Resource requirements would be expected to increase by approximately $204K per year.

2. Compared to the current practice, the highest risk employees (e.g., those that hold NRC Q security clearances), will be tested at the same rate as all other employees.

Option 3: Testing rate of 100 percent.

Pros:

1. This option is consistent with DOD's and NSA's target testing rates of 100 percent.

2. This option has the greatest deterrent effect on illegal drug use for those in the random drug testing pool by increasing the probability of an individual being randomly selected during a one-year period to 65 percent.

Cons:

1. This option is the most costly to implement as resource requirements would be expected to increase by approximately $443K.

2. The highest risk employees (e.g., those that hold NRC Q security clearances), will be tested at the same rate as all other employees.

3. Cost estimate would be dependent upon if the current legacy system could be modified or if a new system would need to be developed.

Option 4: Testing rate of 50 percent for highest risk employees (those that hold NRC Q security clearances) and 25 percent testing rate for remaining employees.

Pro:

The highest risk employees will be tested at a higher rate than all other employees.

Cons:

1. This option would require an increase in resources by approximately $188K.

2. This option would require software changes in EDTTS to implement the new rate. Total cost required to implement this option would be dependent on whether the current legacy system could be modified or if a new system would need to be developed. It is possible that two systems would have to be developed to track and process the two distinct employee groups.

3. There is a greater risk factor with two testing rates in that employees may be placed in the wrong risk category and tested at the wrong rate.