

## **NOTICE OF CHANGES TO JATC'S SUBSTANCE ABUSE POLICY AND PROGRAM**

The following modification to the Joint Apprenticeship and Training Committee's (JATC's) Substance Abuse Policy and Program (Policy) have been adopted by the JATC, in accordance with Paragraph 4 of the Policy's Consent Form.

These modifications will be in effect as of 30 days from your signature indicating you have reviewed this Notice, or on October 1, 2017, whichever comes later.

### **A. Modifications to Drug Testing Policy**

Drug testing under this policy is performed in accordance with standards set by the U.S. Department of Health and Human Resource Services' (HHS) in its "Mandatory Guidelines for Federal Workplace Drug Testing Programs" (HHS Mandatory Guidelines).

**As of October 1, 2017**, HHS is amending the Mandatory Guidelines. While all of the changes apply to this Policy, the JATC hereby alerts you to the most pertinent changes:

#### **1. Testing for additional drugs**

The HHS Mandatory Guidelines provide for a five drug testing panel: those drugs are marijuana, cocaine, opiates, phencyclidine and amphetamines.

As of October 1, 2017, HHS is adding four other drugs to this list: oxycodone, oxymorphone, hydrocodone and hydromorphone. These medications are available by doctor's prescription. Any applicant or apprentice testing positive for these substances, who is taking them according to a valid prescription, will have the opportunity to provide the prescription information to the Medical Review Officer (MRO).

#### **2. Oral fluids testing now authorized in limited circumstances**

The HHS Mandatory Guidelines have permitted testing only on urine samples. Because oral fluids (saliva) testing has the same brief window of detection as urine testing, which is valuable for determining present

impairment, HHS has now decided to permit testing on oral fluids, but only in limited circumstances. That is, when a donor (apprentice or applicant) is unable to provide a sample for urinalysis, HHS will permit testing on the donor's oral fluids sample. The same procedural requirements will be in place for oral fluids testing as for urinalysis, e.g., split samples, chain of custody and review of confirmed positive test by an MRO.

### **3. Altered limit of detection for adulterated sample**

HHS set the lower PH limit of detection for adulterated (altered by other substances) samples at 3. HHS will raise this lower limit of detection to 4.

## **B. Modifications to Alcohol Testing Policy**

Because HHS does not have standards for alcohol testing, this Policy follows the standards for alcohol testing set forth in the Nuclear Regulatory Commission's (NRC's) Fitness for Duty regulations (10 CFR Part 26).

### **1. Change in citation to standards governing alcohol testing**

This Policy cites to the "NRC's Guidelines for Nuclear Power Plant Drug and Alcohol Testing Programs", as set forth in the Federal Register." However, no document of that title exists as of this date. Instead, those Guidelines have been replaced and are incorporated, as updated, into 10 CFR Part 26, principally at 10 CFR 26.31, and 10 CFR Part 26, Subparts E, F and G.

### **2. Oral fluids testing now authorized for initial test**

This Policy states that initial and confirmatory testing for alcohol are done by breathalyzer. NRC has, however, changed its regulations, so that the initial test for alcohol can be done either by breathalyzer, or by oral fluids (saliva) testing. However, the confirmatory test may only be done by breathalyzer, using an approved evidential-grade breath alcohol analysis device (EBT).

### **2. Voluntary blood sample for independent testing no longer permitted**

This policy states that the donor (applicant or apprentice) can elect to provide a blood sample for preservation and independent testing at his or her own expense in the event the confirmatory test is positive.

This option is no longer available under the NRC regulations.

I have carefully read the foregoing Notice of Changes to the JATC's Substance Abuse Policy and Program and understand its contents.

\_\_\_\_\_  
Printed Name of Applicant/Apprentice

\_\_\_\_\_  
Last 4 numbers of SSN

\_\_\_\_\_  
Signature of Applicant/Apprentice

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name of Witness

\_\_\_\_\_  
Signature of Witness

\_\_\_\_\_  
Date