

March 7, 2016

Via Electronic Mail (consultations@cnscccsn.gc.ca)

Canadian Nuclear Safety Commission
P. O. Box 1046, Station B
Ottawa, ON K1P 5S9

RE: Fitness for Duty Draft Regulation DOC 2.2.4

I write on behalf of the Society of Professional Engineers and Associates (SPEA) in connection with the above matter.

Our members are scientists, engineers, technicians, technologists and tradespeople employed at Candu Energy Inc. A significant percentage of our members work at nuclear sites for periods ranging from days to years.

We have reviewed the above draft regulation and wish to register our concerns with the Commission. SPEA strongly opposes the concept of random drug and alcohol testing.

It has been established that such testing is not effective and the invasion of employees' privacy is extreme. In this regard, we have read the Submissions of the Society of Energy Professionals (SEP). We support the detailed analysis and conclusions set out by the SEP.

Yours sincerely



Peter White
President
Society of Energy Professionals and Associates (SPEA)