

FAQs on REGDOC 2.2.4, *Fitness for Duty, Volume II: Managing Alcohol and Drug Use*

1. What is the focus of this regulatory document?

Within the context of fitness for duty, REGDOC 2.2.4, *Fitness for Duty, Volume II: Managing Alcohol and Drug Use*, focuses on the requirements and guidance for managing alcohol and drug use at all high-security sites, such as nuclear power plants.

This regulatory document is part of the CNSC's human performance management series of regulatory documents, which also covers human factors, personnel training and personnel certification. Human performance is a key contributor to the safety and security of nuclear facilities.

2. What is fitness for duty?

Fitness for duty is a condition in which workers are physically, physiologically, and psychologically capable of competently and safely performing their tasks. Fitness for duty affects human performance.

3. How does the published document differ from the one originally submitted to the Commission in August 2017?

Feedback from the Commission resulted in the following main updates to the document:

- REGDOC 2.2.4, *Fitness for Duty, Volume II: Managing Alcohol and Drug Use*, is entirely focused on the management of alcohol and drug use.
- Only workers holding safety-critical positions are now required to submit to random alcohol and drug testing.
- Job applicants for safety-critical positions are now required to submit to pre-placement alcohol and drug testing, once they have progressed through the previous stages of a job competition.
- Safety-sensitive positions will be subject to reasonable grounds, post-incident, and follow-up alcohol and drug testing.

Fitness-for-duty considerations related to medical, psychological and occupational fitness requirements were removed from the document.

4. What will happen with respect to other fitness-for-duty considerations that were removed from the draft regulatory document that was presented to the Commission on August 17, 2017?

Fitness-for-duty considerations that were removed were those related to medical, psychological and occupational fitness requirements. For nuclear security officers, these requirements are addressed in [RD-363, Nuclear Security Officer Medical, Physical, and Psychological Fitness](#). The Commission directed that medical, psychological and occupational fitness requirements for other workers be presented at a future Commission proceeding.

5. Who does this regulatory document affect?

This regulatory document directly affects:

- current and future licensees of high-security nuclear facilities, such as nuclear power plants
- specific workers at high-security nuclear facilities, including the following:

- CNSC-certified workers under the Class I Nuclear Facilities Regulations
- security personnel: nuclear security officers, onsite nuclear response force (NRF) members, and designated non-NRF personnel
- emergency response teams/fire brigades

6. How were the public and stakeholders involved in the development of this regulatory document?

Consultation began when discussion paper DIS-12-03, *Fitness for Duty: Proposals for Strengthening Alcohol and Drug Policy, Programs and Testing*, was issued in 2012. DIS-12-03 presented the CNSC's broad view of fitness for duty and included specific proposals for alcohol and drug policy.

A draft version of the original REGDOC-2.2.4, *Fitness for Duty*, was issued for public consultation from November 9, 2015 to March 7, 2016, with a further subsequent period for feedback on comments received.

The public and stakeholders also had the opportunity to participate in the public Commission meeting on August 17, 2017.

7. When does REGDOC-2.2.4, *Fitness for Duty, Volume II: Managing Alcohol and Drug Use* take effect? What are the plans for implementation?

This regulatory document is intended to form part of the licensing basis for high-security sites and will be incorporated into the licence conditions handbook (LCH) for each applicable licensee. When a new regulatory document is published, it is added to the "Recommendations and Guidance" section of the LCH. Licensees are then required to establish timelines and implementation plans for including the regulatory document's requirements as compliance verification criteria. These timelines and plans are reviewed by CNSC staff and accepted if found to be appropriate, and allow time for licensees to consult with impacted workers prior to implementation. CNSC staff monitor and verify the implementation of new requirements once they are included in the LCH as compliance verification criteria.

8. Are there other regulators in Canada and internationally that have adopted regulatory measures for pre-placement and random alcohol and drug testing?

In Canada, the CNSC is the first regulator to provide regulatory requirements for pre-placement and random testing for safety-critical and safety-sensitive positions.

Some nuclear regulators in other countries have requirements for alcohol and drug testing in the workplace, including random and pre-placement testing.

9. What is the justification for REGDOC-2.2.4, *Fitness for Duty, Volume II: Managing Alcohol and Drug Use*?

The CNSC has developed this regulatory document as part of a proactive approach to regulation to enhance nuclear safety and security at high-security nuclear facilities in Canada.