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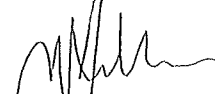


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1. INTRODUCTION

This document provides an overview of the minimum Fitness for Duty (FFD) requirements derived from applicable legislation and regulations, nuclear licensing requirements, world best practices, and Eskom requirements that are applicable to the operator of a nuclear power plant.

The **objective** of a FFD programme is to provide reasonable assurance that Koeberg Power Station site permanent and supplemental personnel will perform their tasks in a reliable and trustworthy manner and are not under the influence of any substance or suffer from any mental or physical impairment which in any way adversely affects their ability to safely and competently perform their duties. The programme also gives reasonable assurance that the workforce has been trained and their technical competence has been assessed.

The requirements are commonly referred to as the “FFD process” and it describes the requirements that must be met before a person is allowed to perform work on the Koeberg site.

2. SCOPE

2.1 PURPOSE

The purpose of this document is to specify the minimum FFD requirements for the Koeberg Nuclear Power Station site. The FFD process has been designed to only allow persons to perform work if they:

- Have valid identification documentation
- Have been declared free of drugs and alcohol
- Have been declared healthy, physically able and free of any medical condition that could impair their ability to perform the work they have been appointed for
- Have been declared mentally fit to perform the work they have been appointed for
- Have the qualifications required for the position
- Have received the minimum plant training required to work on site
- Have valid work permits (non-South Africans)
- Have completed the security background verification process
- Have been declared competent to perform the work they have been appointed for
- Have received the specific training required for the work that they will be required to perform
- Have signed a non-disclosure agreement to protect the Eskom information they come in contact with

2.2 APPLICABILITY

The FFD requirements addressed in this document is applicable to all persons who are required to perform work within the Owner Controlled Area of the Koeberg site.

This standard is not applicable to visitors.

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3. NORMATIVE/INFORMATIVE REFERENCES

Parties using this document shall apply the most recent edition of the documents listed in the following paragraphs.

3.1 NORMATIVE

- [1] 32-83: Eskom Nuclear Management Policy
- [2] 240-58314417: Occupational Health Services Person Job Specification
- [3] 335-2: Koeberg Nuclear Power Station Management Manual
- [4] 335-68: Fitness for Duty Requirements for Work to be Performed Inside the Owner Controlled Area of Koeberg Nuclear Power Station
- [5] Communication Brief No.17/2010: Access to Koeberg – Foreigners
- [6] Immigration Amendment Act, no 19 of 2004
- [7] KAA-500: The Process for Controlled Documents
- [8] KAA-774: Security Integrity Screening
- [9] KAA-777: Process for Access to Koeberg Nuclear Power Station
- [10] KGA-075: Guidelines for the Completion of the Job Specification Form
- [11] KSA-011: The Requirements for Controlled Documents
- [12] KSA-055: Requirements for the Medical and Psychological Surveillance and Control Programme
- [13] KSA-119: Management and Control of Supplemental Workers Koeberg Nuclear Power Station
- [14] KSA-137: Training Requirements and Competence Criteria for Supplemental Personnel Requiring Access to Koeberg
- [15] Occupational Health and Safety Act, no 85 of 1993

3.1.1 Informative

- [16] 32-37: Management of Substance Abuse in the Workplace
- [17] 32-85: Information Security Policy
- [18] 32-143: Handling of Classified Items
- [19] 36-32: Industrial Psychological Assessment Directive
- [20] 36-197: Koeberg Licensing Basis Manual KLBM
- [21] GGPP-1458: Medical and Psychological Surveillance and Control of Nuclear Installation Personnel
- [22] KAA-591: Medical and Psychological Surveillance and Control of Radiation Workers and Licenced Operators
- [23] KAA-708: Processing a Safety Assurance Certificate and Work in Hazardous Areas
- [24] KGT-055: General Radiation Protection Training Guide
- [25] KSH-010: Functional Responsibilities for Radiation Protection at Koeberg Operating Unit
- [26] KSV-001: Requirements for the Medical and Psychological Surveillance and Control of Radiation Workers and Licensed Operators

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- [27] LD-1077: Requirements for Medical and Psychological Surveillance and Control
- [28] LG-1018: A Guide to the Requirements for Medical Surveillance and Control of Radiation Workers at Licenced Facilities
- [29] Standard NEC Contract: Requirements for Contractor Qualifications

3.2 DEFINITIONS

Definition	Explanation
Applicant	A person who is not yet authorised to perform work on the Koeberg Nuclear Power Station site, or of whom the validity of previously completed training has expired.
Drug	Any chemical or natural (e.g. cannabis) substance, which produces physical, mental, emotional or behavioural changes in the user.
Contractor	Any company, vendor, consultant or individual with which Eskom has contracted for work or services to be performed on the Koeberg site, either by contract or purchase order. The person/organisation that receives a task order for work to be performed on the Koeberg site. Employer may also mean, for each contract under the NEC: <input type="checkbox"/> Engineering and Construction Contract (ECC) – The Contractor <input type="checkbox"/> Engineering and Construction Short Contract (ECSC) – The Contractor <input type="checkbox"/> Term Services Contract (TSC) – The Contractor <input type="checkbox"/> Term Services Short Contract (TSSC) – The Contractor <input type="checkbox"/> Professional Services Contract (PSC) – The Consultant <input type="checkbox"/> Professional Services Short Contract (PSSC) – The Consultant <input type="checkbox"/> Supply Contract (SC) – The Supplier <input type="checkbox"/> Supply Short Contract (SSC) – The Supplier
Drugs Test	A test to established the presence of drugs, drug metabolites in a specimen.
FFD Co-ordinator	A person responsible for the co-ordination of all FFD activities.
FFD Representatives	Person who represents the Contractor or Eskom staff on site.
FFD System	An electronic software system controlling the activities of the FFD programme.
Fitness for Duty	A process that coordinates all the requirements that an applicant must comply with before work may be performed on the Koeberg site.
Human Performance Tools Training	A compulsory course in which persons are trained to apply human performance tools in order to correctly and safely perform work activities on site.
Host	Before doing these activities of a host he/she must have passed the FFD requirements. It is a requirement that the host remain in “line of sight” of his/her visitor at all times whilst the person is inside the PA.
Koeberg Nuclear Power Station Site	The entire area inside the Owner Controlled Area of KNPS.
Medical Evaluation	A medical examination of a person, by competent medical staff, to establish if the person’s health allows the person to perform his/her work activities without endangering the person’s life or that of other staff.
Owner Controlled Area	The total area owned by Eskom SOC Limited at the Koeberg Nuclear Power Station.

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Definition	Explanation
Plant Induction Training	Training given to applicants that will perform work in the protected area which includes the intake basin as to inform them of the power station layout, emergency plan, security arrangements, safety rules, etc.
Protected Area	The area within the ACP-2 plant security fence.
Site Induction Training	Training given to applicants, that will perform work outside the protected area, to inform them of the site layout, emergency plan, security arrangements, safety rules, etc.
Visitor	A person that requires unescorted access to the OCA and escorted access to the Protected Area that are not allowed to perform any physical work on the Koeberg site.
“Work”	<p>Occupational Health and Safety Act 85 of 1983</p> <p><i>“work” means work as an employee or as a self-employed person, and for such purpose an employee is deemed to be at work during the time that he is in the course of his employment, and a self-employed person is deemed to be at work during such time as he devotes Training given to applicants, that will perform work outside the protected area, to inform them of the site layout, intake basin (PIT required for access), emergency plan, security arrangements, safety rules, etc. to work as a self-employed person;</i></p> <p>Immigration Amendment Act 19 of 2004</p> <p><i>“Work” includes;</i></p> <ul style="list-style-type: none"> <i>(a) conducting any activity normally associated with the running of a specific business; or</i> <i>(b) being employed or conducting activities consistent with being employed or conducting activities consistent with the profession of the person, without remuneration or reward, within the Republic.</i>

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3.3 ABBREVIATIONS

Abbreviation	Explanation
ACP-1	Access Control Point 1
ACP-2	Access Control Point 2
CM	Contract Manager
FFD	Fitness for Duty
HPT	Human Performance Training
ID	Identification Document
KNPS	Koeberg Nuclear Power Station
OCA	Owner Controlled Area
PA	Protected Area
PIT	Plant Induction Training
SIT	Site Induction Training

4. REQUIREMENTS

4.1 GENERAL REQUIREMENTS

- 4.1.1 Persons who are required to perform work on the Koeberg site shall comply with the requirements of this standard. The requirements may differ depending on the contractual needs and the specific work that the person will be required to perform.
- 4.1.2 The Contracts and Logistics Manager is responsible for establishing an organisation to ensure that the requirements of this standard are met by all parties concerned.
- 4.1.3 Changes to the FFD standard shall be communicated to all Head of Departments. Site representatives and affected contractors shall ensure that they remain familiar with the standard at all times.
- 4.1.4 Persons that do not comply with this standard shall not be allowed to perform work on the KNPS site.
- 4.1.5 The Contractor and Eskom is responsible to ensure that the applicant is registered on the FFD system and is assisted to comply with all the requirements of this standard.
- 4.1.6 External or remote FFD facilities can be accredited to facilitate training related FFD requirements.

4.2 PERSONAL IDENTIFICATION

- 4.2.1 Proof of identification and proof of address not older than 3 months shall be required before a person is allowed to register on the FFD system.
- 4.2.2 The following identification documents are the only documents that shall be accepted as proof of identification:
- South African Identification Book issued by the Department of Home Affairs or
 - ID Smart Card issued by the Department of Home Affairs (SA) or
 - Valid Official Passport or
 - Valid Temporary Identification Document issued by the Department of Home Affairs. This must not be older than three (3) months.

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4.3 COMPULSORY FFD REQUIREMENTS

The following requirements shall be met by all applicants who are required to perform work on the Koeberg site.

4.3.1 Work Permits

- Eskom shall adhere to the requirements of the Immigration Act at all times.
- Non South African Citizens are required to be in possession of the relevant and valid Work Permit as required by the Department of Home Affairs before access is considered.

4.3.2 Initial Security Screening

- The criminal history of an applicant shall be assessed before access to the Koeberg site is considered.
- The applicant shall be required to give his/her consent to Eskom to obtain the relevant information from the South African Police Services.
- Non South African citizens are required to provide proof of their criminal history. The criminal history report from their country's law enforcement agency or INPO (USA citizens only) shall be dated within two (2) months of their required access date.
- Non South African citizens that have not left the Republic of South Africa after their last criminal history check shall be screened internally.
- Applicants with a criminal background/record shall be denied access until the appeals process is followed as stipulated in KAA-777.

4.3.3 Residential Address

- An applicant shall provide proof of his/her residential address not older than 3 months before registration on the FFD system is considered.
- All foreign nationals shall provide proof of their local address not older than 3 months before registration on the FFD system is considered.

4.3.4 Drug Testing

- Applicants shall be required to submit to a drug test before work may commence.
- The detail of this requirement is captured in 32-37: Substance Abuse Procedure.
- Drug tests shall be performed at any time.
- Contractors that test positive shall be denied access for a period of 24 months, commencing from the test date. Any request for a waiver needs to follow KAA-774 process.

4.3.5 Health Assessments

- Applicants are required to undergo medical surveillance before work may commence.
- A signed Occupational Health Services Person Job Specification (240–58314417) and GA14 form is required for this activity.

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- Applicants who are declared unfit to perform the inherent activities during the health assessment shall not be allowed access to site.
- The detail of this requirement is captured in KSA-055: Requirements for the Medical and Psychological Surveillance and Control Program.

4.3.6 Site Induction Training (SIT)

- Applicants that are required to work outside the protected area of KNPS, excluding the intake basin, shall be required to complete the Site Induction Training (SIT) course before work may commence.
- The SIT course is designed for persons working in the OCA and shall be different from the Plant Induction Training (PIT) course for persons working in the protected area of KNPS and the coastal intake basin.
- Applicants that do not successfully complete the **SIT** course shall not be allowed access to the site.

4.3.7 Plant Induction Training (PIT)

- Applicants that are required to work inside the protected area of KNPS shall be required to complete the Plant Induction Training (PIT) course before work may commence.
- Applicants that do not successfully complete the PIT course shall not be allowed access to the site.
- Persons required to perform work in the coastal intake basin shall be required to pass Plant Induction Training (PIT).

4.3.8 Human Performance Training (HPT)

- Applicants are required to complete the Human Performance Training (HPT) before work may commence.
- The HPT course for persons working in the OCA shall be different from the HPT course for persons working inside the protected area of Koeberg.
- The content of the HP Training course shall be aligned to meet the HP needs for skilled and unskilled workers.
- Applicants that do not successfully complete the HPT course shall not be allowed access to site.
- Transmission personnel will be exempted from Koeberg's PIT and HPT if they produce proof that the Transmission PIT and HPT are valid and aligned to the nuclear safety aspect of KNPS.
- Persons required to perform work in the coastal intake basin shall be required to pass the protected area HPT.

4.3.9 Non-disclosure of Information

- Applicants are required to complete and sign a non-disclosure agreement. This is to ensure that Eskom information that comes to the attention of the individual is protected.

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4.4 RADIATION WORKER TRAINING

4.4.1 Applicants are required to successfully complete the required radiation worker training before access to radiation zones is considered.

4.4.2 Failure to successfully complete the radiation training shall result in access to radiation zones being denied.

4.5 SPECIFIC TRAINING

4.5.1 The scope of each applicant's work requirements shall be assessed to determine the additional training that is required before work may commence.

4.5.2 The responsible Line Managers for the applicants shall be required to identify the specific training needs and ensure compliance.

4.5.3 Additional training may include but is not limited to:

- confined space
- working at heights,
- foreign material exclusion,
- working with asbestos
- basic rigging
- materials handling
- supervisor training

The details of these requirements are captured in KSA-137.

4.6 TECHNICAL ASSESSMENTS

4.6.1 Persons that are required to perform work of a technical nature on the Koeberg site shall be required to perform technical assessments and be authorised to perform the work that they have been assessed for.

4.6.2 Applicants that do not successfully complete the technical assessment may not perform hands-on work on the Koeberg site.

4.6.3 The details of this requirement are captured in KSA-137.

4.7 FINAL ACCEPTANCE

All required FFD requirements shall be completed successfully before final acceptance is processed and a security permit is issued.

The technical personnel must apply for a competence card and it will be issued after all FFD related training is successfully completed.

4.8 VISITORS

Visitors are not allowed to perform work on the Koeberg site. Access requirements for visitors are dealt with in KAA-777 "Process for Access to KNPS".

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4.9 EXIT PROCEDURE

The responsible Line Managers shall ensure that permit holders that no longer require access to site shall be required to comply with the FFD exit procedure. Non adherence to this process shall be deemed a Non Compliance and disciplinary action can be instituted against such an individual or alternatively against the Site Rep for such a person. Such a person shall be barred from site.

4.10 APPEAL PROCESS

Appeals in respect of criminal records and substance abuse cases shall be processed in terms of procedure KAA-774 "Security Screening Process".

4.11 WAIVER PROCESS

4.11.1 Waivers in respect of training requirements shall only be considered in exceptional circumstances and shall be accompanied by a risk assessment before a decision is taken.

4.11.2 Waiver applications shall be processed in terms of KSA-137 "Training Requirements and Competence Criteria for Supplemental Personnel Requiring Access to Koeberg"

4.12 VERIFICATION OF QUALIFICATIONS

Eskom retains the right to verify any tertiary qualification that an applicant is required to have to work in a specific discipline.

4.13 FRAUDULENT DOCUMENTS

Applicants that have presented fraudulent documentation shall be permanently denied access to the Koeberg site.

4.14 FALSE DECLARATIONS

Applicants that have made false declarations shall be permanently denied access to the Koeberg site.

4.15 LIAISON

Any enquiries relating to the FFD requirements shall be through the Eskom appointed FFD co-ordinator or the CM (or his duly delegated representative) for the specific contract.

4.16 PROTECTION OF INFORMATION

Eskom shall not disclose the personal information obtained through the FFD process to any person that is not authorised to be in possession of such information.

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5. ACCEPTANCE

This document has been seen and accepted by:

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6. REVISIONS

Date	Rev.	Compiler	Remarks
August 2013	1	JA Norman	Supersedes KSA-109.
February 2018	2	P Jacobs	Full Review
February 2021	3	R Behr	Full Review

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