December 9, 1992

Mr. R. Lynnard Tessner
Director, Office of Pipeline Safety
Georgia Public Service Commission
244 Washington Street, S.W.
atlanta, GA 30334-5701

Dear Mr. Tessner:

This is in response to your correspondence dated October 6, 1992, requesting this office's evaluation of a random selection process which could be used by a large number of small gas systems in the State of Georgia.

You outline a procedure which sets forth random testing options for small gas systems whose employee population ranges from one to seven employees. The procedure provides for quarterly testing at a testing rate of 50 percent. For ease of explaining you indicate that slips of paper with employee names would be placed in a hat. If there are seven or fewer employees in the random pool, add enough blank slips with the name slips in the hat to total eight slips of paper.

Your procedures for testing are outlined below:

1.   With seven employees add one slip and pull sample from hat four times a year. On each sample pull, each employee will have 1/8 chance of being selected. Since there are seven employees that makes a 7/8 chance that an employee would be selected. If four selections are chosen per year on an average 7/8 x 4 = 3.5 employees will selected and tested which would equal 50 percent.

2.   With six employees add two slips and pull sample from hat four times a year. On each sample pull, each employee will have a 1/8 chance of being selected. Since there are six employees that makes a 6/8 chance that an employee would be selected. If four selections are chosen per year on an average 6/8 x 4 = 3 employees will be selected and tested which would equal 50 percent.

3.   With five employees add three slips and pull sample from hat four times a year. On each sample pull, each employee will have a 1/8 chance of being selected. Since there are five employees that makes a 5/8 chance that an employee would be selected. If four selections are chosen per year on an average 5/8 x 4 = 2.5 employees will be selected and tested which would equal 50 percent.

4.   With four employees add four slips and pull sample from hat four times a year. On each sample pull, each employee will

have 1/8 chance of being selected. Since there are four employees that makes a 4/8 chance that an employee would be selected. If four selections are chose per year on an average 4/8 x 4 = 2 employees will be selected and tested which would equal 50 percent.

5. With three employees add five slips and pull sample from hat four times a year. On each sample pull, each employee will have a 1/8 chance of being selected. Since there are three employees that makes a 3/8 chance that an employee would be selected. If four selections are chosen per year on an average 3/8 x 4 = 1.5 employees will be selected and tested which would equal 50 percent.

6. With two employees add six slips and pull sample from hat four times a year. On each sample pull, each employee will have a 1/8 chance of being selected. Since there are two employees that makes a 2/8 chance that an employee would be selected. If four selections are chosen per year on an average 2/8 x 4 = 1 employee will be selected and tested which would equal 50 percent.

7. With one employee add seven slips and pull sample from hat four times a year. On each sample pull, each employee will have a 1/8 chance of being selected. Since there is one employee that makes a 1/8 chance that an employee would be selected. If four selections are chosen per year on an average 1/8 x 4= 1/2 or 1 employee will be selected and tested which would equal 50 percent.

It would appear that the procedure you have presented may be feasible for small gas systems and would meet the intent of conducting random testing as outlined in Section 199.11(c).

Thank you for your inquiry. Please let me know if you need any additional information about our drug testing requirements.

Sincerely,

Richard L. Rippert
Drug Compliance Coordinator
Office of Pipeline Safety
        Enforcement