



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

February 23, 2001

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Gentlemen:

In the Matter of	)	Docket Nos.	50-259	50-390
Tennessee Valley Authority	)		50-260	50-391
			50-296	50-438
			50-327	50-439
			50-328	

FITNESS FOR DUTY (FFD) PROGRAM PERFORMANCE DATA: JULY-DECEMBER 2000

In accordance with 10 CFR 26.71(d), TVA is providing FFD Program Performance Data for the six-month period of July 1-December 31, 2000. Enclosure 1 contains a discussion of recent FFD Program developments and FFD trends since the last reporting period. Enclosures 2-4 contain the performance data and summary of TVA management actions for TVA's nuclear plant sites (Browns Ferry, Sequoyah, and Watts Bar, respectively). Enclosure 5 consolidates the data for TVA's Nuclear corporate organization (primarily Chattanooga and Knoxville corporate offices) and Bellefonte Nuclear Plant. There were no FFD events reported to the NRC pursuant to 10 CFR 26.73 during this six-month period.

The random testing rate of drug and alcohol use for the workforce that is subject to random testing is in accordance with the requirements prescribed in 10 CFR 26.24 (a)(2).

If you have any questions concerning this information, please telephone Terry Knuettel at (423) 751-6673.

Sincerely,

Mark J. Burzynski  
Manager  
Nuclear Licensing

Enclosures  
cc: See page 2

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Athens, Alabama 35611

NRC Senior Resident Inspector  
Sequoyah Nuclear Plant  
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Soddy Daisy, Tennessee 37379-3624

NRC Senior Resident Inspector  
Watts Bar Nuclear Plant  
1260 Nuclear Plant Road  
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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY (TVA)  
FITNESS FOR DUTY (FFD) PERFORMANCE DATA  
JULY 1-DECEMBER 31, 2000

The following summarizes four matters associated with TVA's FFD Program that occurred during this reporting period:

I. TVA's "Re-screening of Specimens"

Reference: TVA's policy to re-screen specimens with a creatinine level less than 20 mg/dl, which was addressed in the February 28, 1997 FFD Performance Report.

Summary

TVA Nuclear (TVAN) screened 91 specimens at the lower cutoff for marijuana during this reporting period. There were no positive tests identified from this group.

II. Attempted FFD Testing Subversions Detected

Summary

Two incidents of urine adulteration were identified by the TVAN Corporate Nuclear Security FFD Staff. Refer to Enclosures 2 and 3, Pages 1 of 3 of each enclosure for additional information.

TVAN Corporate Nuclear Security and its contract laboratories continue to research and implement the most effective methods to detect FFD testing subversion.

III. Inadequate Toilet Bluing and Unlocked Refrigerator at Collection Facility

Summary

During TVA Nuclear Assurance's annual audit of FFD, Security, and Safeguards Information, the audit team concluded that TVAN's FFD Program met regulatory and TVA requirements and was being effectively implemented. No significant issues were identified; however, two deficiencies were identified at Sequoyah Nuclear Plant (SQN) during the audit. TVAN FFD Procedure 3, "NRC Regulated Urine Drug Screen Collection Procedure," states in part: "... Toilet bluing agents shall be placed in the toilet tanks or urinals so the reservoir of water in the bowl always remains blue ..." and "... secure the sealed specimens in a locked refrigerator until ready for shipment ..."

Contrary to these requirements, on October 16, 2000, an auditor at SQN observed that the water in one toilet within the drug screening trailer did not have adequate bluing agent. The auditor also observed that one refrigerator used to store specimens did not have a lock on its door. Both deficiencies were corrected immediately and a Problem Evaluation Report (PER) was initiated and entered in TVAN's corrective action program to address these matters. The auditor noted, at the time the deficiencies were observed, that there was no evidence of specimens having been compromised and that the entrance to the room containing the unlocked refrigerator was monitored by Medical personnel. Additional PER corrective actions included:

- FFD Procedure 3 was revised to include the statement: "The collector should verify that the toilet bowl bluing is adequate before each collection."
- An additional action item for the technician performing the daily quality control (QC) to verify "refrigerator lock in working order" was added to the Intoxilyzer Daily, Monthly QC Log.

The corrective action items were completed during this reporting period, and the PER is pending closure.

## IV. Delay in Random Alcohol and Drug Testing

Summary

On December 26, 2000, a delay was encountered at Browns Ferry Nuclear Plant (BFN) in administering a random alcohol & drug test for a selected individual. The Operations Shift Manager, after being notified of his random selection, could not leave the protected area to report to the site Medical office because no relief person was available. TVAN Standard Programs and Processes (SPP) 1.2, "Fitness for Duty," Section 3.3.1. C., "Random Alcohol and Drug Testing," states in part: "... The person selected is responsible for reporting promptly (without delay) to the medical/collection facility," and "No advance notification/warning will be given ... ." A PER was initiated and entered into TVAN's corrective action program to address this issue.

The PER apparent cause noted that a Medical staff employee notified an Operations Unit Supervisor that the Operations Shift Manager had been selected for random alcohol and drug testing. The Medical employee mistakenly thought the Unit Supervisor was the Shift Manager on duty because the Unit Supervisor answered the phone normally manned by the Shift Manager. The Unit Supervisor then notified the Shift Manager of his selection, thereby prohibiting any flexibility regarding the testing. SPP 1.2 permits delayed notifications in unusual circumstances and when coordinated and approved by the Site Medical Office. However, once the selected individual has been notified, he/she must report promptly (without delay) for testing. The immediate corrective action for the situation entailed measures taken to test the Shift Manager inside the Protected Area that day. Other corrective action items included:

- FFD administrative procedures were reviewed with the BFN Medical staff.
- A listing of the incumbent Operations Shift Managers and Shift Technical Advisors was provided to the BFN Medical staff. Through utilization of this list, future notifications to Shift Managers or Shift Technical Advisors of their selection for random testing will be performed by managers at the Operations Superintendent level or above.

The PER corrective actions were completed, and the PER was closed.

JULY 1-DECEMBER 31, 2000

TRENDS

The confirmed positive test rate for all categories (pre-employment, pre-access, for-cause, post-accident, random, follow-up, and other) for this reporting period was 0.59 percent (19 positive tests) which is 0.34 percent lower than the last reporting period. The rate of random confirmed positives was 0.28 percent (4 positive tests) which is 0.21 percent lower than the last reporting period.

ENCLOSURE 2

SUMMARY OF MANAGEMENT ACTIONS FOR  
BROWNS FERRY NUCLEAR PLANT

In the **pre-access** test category, one contract employee (CE) tested positive. The CE was denied access, removed from site, returned to the contract company, and restricted from TVAN work for three years. The CE requested that a split specimen be performed. The split specimen test reconfirmed the positive test results. The CE did not request an appeal.

In the **random** test category, one licensee employee (LE) was detected attempting to subvert the testing process by adulteration. Due to the adulteration, the LE's test results could not be reported as negative or positive. The LE's unescorted access was revoked. The LE was removed from site and permanently restricted from TVAN work. The LE's employment was subsequently terminated on December 18, 2000.

Also in the **random** test category, one LE tested positive. The LE's unescorted access was revoked. The LE was suspended from work for 14 days and referred to the Employee Assistance Program. A review of the LE's work was performed with no deficiencies identified. The LE did not return to work during this reporting period.

# Fitness for Duty Program Performance Data Personnel Subject to 10 CFR 26

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 2000	
Company		6 Months Ending	
BROWNS FERRY NUCLEAR PLANT			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
<b>Cut-offs:Screen/Confirmation</b>		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol(%BAC)	/

\*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		1,205				296	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		41	0	N/A	N/A	128	1
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	0	0
Random		322	1	N/A	N/A	82	0
Follow-up		1	0	N/A	N/A	N/A	N/A
Other **		0	0	N/A	N/A	0	0
Total		364	1	N/A	N/A	210	1

\*\* The other test category includes: transfer to TVAN from other TVA organizations; administrative follow-up; program integrity clearance/update; assignment to emergency response duties; and return-to-work.

**REV. 1/92**

**Breakdown of Confirmed Positive Tests for Specific Substances**

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	1	0	0	0	0	0	0	
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Short-Term Contractors	1	0	0	0	0	0	0	0	0	0	0	0	
Total	1	0	0	0	0	1	0	0	0	0	0	0	2

**Cutoff Levels of Additional Drugs**

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300



ENCLOSURE 3

SUMMARY OF MANAGEMENT ACTIONS FOR  
SEQUOYAH NUCLEAR PLANT

In the **pre-access** testing category, six contract employees (CEs) tested positive. One of the six CEs tested positive for two substances. The CEs were denied access, removed from site, returned to their contract company, and restricted from TVAN work for three years. None of the CEs requested that a split specimen be performed. None of the CEs requested an appeal.

In the **random** testing category, one CE was detected attempting to subvert the testing process by adulteration. Due to the adulteration, the CE's test results could not be reported as negative or positive. The CE's unescorted access was revoked. The CE was removed from site, returned to the contract company, and permanently restricted from TVAN work. The CE requested an appeal but TVAN was subsequently unable to re-contact the CE to arrange for the appeal within this reporting period.

Also in the **random** testing category, one licensee employee (LE) tested positive. The LE's unescorted access was revoked. The LE was suspended from work for 14 days and referred to the Employee Assistance Program. A review of the LE's work was performed with no deficiencies revealed. The LE subsequently resigned from TVAN employment on November 15, 2000, before entering the EAP prescribed treatment program.

# Fitness for Duty Program Performance Data Personnel Subject to 10 CFR 26

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 2000	
Company		6 Months Ending	
SEQUOYAH NUCLEAR PLANT			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
<b>Cut-offs: Screen/Confirmation</b>		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol(%BAC)	/

\*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		1,325		N/A		476	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		46	0	N/A	N/A	439	6
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	0	0
Random		313	1	N/A	N/A	141	0
Follow-up		6	0	N/A	N/A	N/A	N/A
Other **		3	0	N/A	N/A	0	0
Total		368	1	N/A	N/A	580	6

\*\* The other test category includes: transfer to TVAN from other TVA organizations; administrative follow-up; program integrity clearance/update; assignment to emergency response duties; and return-to-work (3)-TVA.

**REV. 1/92**

**Breakdown of Confirmed Positive Tests for Specific Substances**

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	5	
Licensee Employees	1	0	0	0	0	0	0	0	0	0	0	0	
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Short-Term Contractors	6	0	0	1	0	0	0	0	0	0	0	0	
Total	7	0	0	1	0	0	0	0	0	0	0	0	8

**Cutoff Levels of Additional Drugs**

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300

ENCLOSURE 4

SUMMARY OF MANAGEMENT ACTIONS FOR  
WATTS BAR NUCLEAR PLANT

In the **pre-access** testing category, seven contract employees (CEs) tested positive. One of the seven CEs tested positive for two substances. The CEs were denied access, removed from site, returned to their contract company, and restricted from TVAN work for three years. One of the seven CEs requested that a split specimen be performed. The split specimen test reconfirmed the positive test results. None of the CEs requested an appeal.

In the **random** testing category, two CEs tested positive. The CEs' unescorted access was revoked. The CEs were removed from site, returned to the contract company, and restricted from TVAN work for three years. Review of both of the CE's work was deemed unnecessary. The basis for this decision was that one of the CE's work was administrative and the other CE's unescorted access was issued and revoked on the same day. One of the CEs requested that a split specimen test be performed. The split specimen test reconfirmed the positive test results. The CE requesting the split specimen did not request an appeal. The one CE testing positive for alcohol requested a confirmatory blood alcohol test. The blood test confirmed the positive test results. The CE testing positive for alcohol requested an appeal. The positive test decision was upheld in the appeals process.

In the **for-cause** testing category, one CE tested positive. The CE's unescorted access was revoked. The CE was removed from site, returned to the contract company, and permanently restricted from TVAN work. A review of work was deemed unnecessary since the CE, during the four days between being hired and testing positive for alcohol, was in training status and did not perform any work inside the protected area. The CE did not request a confirmatory blood alcohol test or an appeal.

# Fitness for Duty Program Performance Data Personnel Subject to 10 CFR 26

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 2000	
Company		6 Months Ending	
WATTS BAR NUCLEAR PLANT			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
Cut-offs: Screen/Confirmation		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol(%BAC)	/

\*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		1,032		N/A		514	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		55	0	N/A	N/A	1,044	7
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	1	1
Random		221	0	N/A	N/A	158	2
Follow-up		3	0	N/A	N/A	N/A	N/A
Other **		0	0	N/A	N/A	0	0
Total		279	0	N/A	N/A	1,203	10

\*\* The other test category includes: transfer to TVAN from other TVA organizations; administrative follow-up; program integrity clearance/update, and assignment to emergency response duties.

**REV. 1/92**

**Breakdown of Confirmed Positive Tests for Specific Substances**

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	0	0	0	0	0	0	0	
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Short-Term Contractors	5	2	0	2	0	2	0	0	0	0	0	0	
Total	5	2	0	2	0	2	0	0	0	0	0	0	11

**Cutoff Levels of Additional Drugs**

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300

ENCLOSURE 5

SUMMARY OF MANAGEMENT ACTIONS FOR  
CORPORATE TVAN OFFICES AND BELLEFONTE NUCLEAR PLANT

There were no positive tests in the Corporate TVAN Offices (primarily Chattanooga and Knoxville corporate offices) and Bellefonte Nuclear Plant during this reporting period.

# Fitness for Duty Program Performance Data Personnel Subject to 10 CFR 26

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 2000	
Company		6 Months Ending	
CORPORATE OFFICES (CHATTANOOGA, KNOXVILLE, BELLEFONTE, AND OTHER)			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
<b>Cut-offs: Screen/Confirmation</b>		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol(%BAC)	/

\*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access **		N/A		N/A		N/A	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		N/A	N/A	N/A	N/A	N/A	N/A
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	0	0
Random		147	0	N/A	N/A	15	0
Follow-up		4	0	N/A	N/A	N/A	N/A
Other ***		8	0	N/A	N/A	6	0
Total		159	0	N/A	N/A	21	0

\*\* Persons assigned to the corporate organization or Bellefonte, but with unescorted access at a TVAN site, are included in the average for the site or sites where they hold the unescorted access authorization.

\*\*\* The other test category includes: employment (1)-TVA, (4)-contract; transfer to TVAN from other TVA organizations (1)-TVA; administrative follow-up; program integrity clearance/update (1)-TVA, (2) contract; assignment to emergency response duties (5)-TVA; and return to work.

REV. 1/92



**Breakdown of Confirmed Positive Tests for Specific Substances**

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	5
Licensee Employees	0	0	0	0	0	0	0	0	0	0	0	0
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Short-Term Contractors	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0

**Cutoff Levels of Additional Drugs**

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300