

10CFR26.71(d)

February 27, 2001

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

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

Subject: Peach Bottom Atomic Power Station, Units 2 & 3
Limerick Generating Station, Units 1 & 2
Fitness-for-Duty Program Performance Data for the Period -
July 2000 through December 2000

Dear Sir/Madam:

As required by 10CFR26.71(d), this letter submits the performance data for Exelon's Fitness-for-Duty (FFD) Program for the period July 2000 through December 2000. The data for our Peach Bottom Atomic Power Station (PBAPS), Units 2 & 3, and Limerick Generating Station (LGS), Units 1 & 2, sites are provided in Attachments 1 and 2. Data for our Corporate Office and Kennett Square (Exelon Nuclear) Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA, and Kennett Square, PA, respectively) are provided in Attachment 3.

The data is reported on the January 1992 revision of the FFD Performance Data form provided by the Nuclear Energy Institute (NEI), formerly the Nuclear Management and Resources Council (NUMARC), and includes the following:

- Drugs tested for and cut-off levels.
- Workforce population tested.
- Numbers of tests and results by population and type of test (i.e., pre-access, for cause, random, follow-up, and other types of tests).
- Substances identified.

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Attachments 1, 2, and 3 also include the following:

- A summary of management actions.
- Analysis of the data and appropriate actions that have been taken.
- Random testing rate.

During this period, there were no significant FFD events reported.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. A. Hutton".

James A. Hutton
Director - Licensing

Attachments

cc: H. J. Miller, Administrator, Region I, USNRC (w/attachment)
A. L. Burritt, USNRC Senior Resident Inspector, LGS (w/attachment)
A. C. McMurtry, USNRC Senior Resident Inspector, PBAPS (w/attachment)

ATTACHMENT 1

Peach Bottom Atomic Power Station

Units 2 and 3

Fitness-for-Duty Performance Data

July 2000 through December 2000

**FITNESS FOR DUTY
PERFORMANCE DATA
PERSONNEL SUBJECT TO 10 CFR 26**

Exelon Nuclear

December 31, 2000

Company

Six Months Ending

Peach Bottom Atomic Power Station

Location

David M. Sarley

215-841-5703

Contact Name

Phone (include area code)

Cutoffs: Screen/Confirmation (ng/ml) ☐ Appendix A to 10 CFR 26

Marijuana 50 / 15 Amphetamines 1000 / 500 _____ /

Cocaine 300 / 150 Phencyclidine 25 / 25 _____ /

Opiates 300 / 300 Alcohol (% BAC) 0.04 _____ /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		2229				906	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		60	0			636	13
FOR CAUSE	Post accident	0	0			1	0
	Observed behavior	2	0			4	1
Random		254	0			92	1
Follow-up		29	0			44	0
Other		2	0			2	0
Total		347	0			779	15

Breakdown of Confirmed Positive Tests for Specific Substances:

Peach Bottom Atomic Power Station – December 31, 2000

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal To Test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	0	0						
Long -Term Contractors	0	0	0	0	0	0	0						
Short -Term Contractors	8	2	3	0	0	1	1						A
Total	8	2	3	0	0	1	1 ¹						15

¹ Chromate Adulteration

Attachment 1
Summary of Data Analysis and Management Actions
Peach Bottom Atomic Power Station
July 2000 – December 2000

I. Initiatives Taken

None

II. Management Actions

During the period, fifteen (15) contractors tested positive at the Peach Bottom Atomic Power Station (PBAPS), i.e., thirteen (13) pre-access, one (1) for cause – observed behavior, and one (1) random. In accordance with company policy all contractor employees were denied unescorted access.

III. Events Reported Under 10 CFR 26.73

No significant FFD events were reported by PBAPS during the period.

IV. Audits/Inspections

During the period Nuclear Quality Assurance personnel audited portions of the FFD program as part of the Continuous Assessment Process. Four (4) deficiencies were identified involving: HHS laboratory personnel qualification files; HHS laboratory opiate testing procedure; collection procedures when FFD personnel are tested; and, the testing frequency of personnel in follow-up testing program. Immediate corrective actions were taken and actions to prevent reoccurrence implemented.

V. Random Testing Rate

The company maintains separate testing "pools" for employees and contractors. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and Limerick Generating Station (LGS). Random testing is conducted at an annualized rate of 50%. Actual random testing during the period equaled an annualized rate of 49.6% for employees and 39.5% for contractors. Actual random testing during the year 2000 equaled an annualized rate of 50.2% for employees and 50.7% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

The company has elected to temporarily suspend access for individuals as permitted by 10 CFR 26.24(d).

During the previous 6-month reporting period, (i.e., January - June 2000), 100% of the specimens identified as presumptive positive for cocaine as a result of preliminary on-site screening tests were subsequently reported as positive by the HHS-certified laboratory. The confirmation rate for marijuana was 90%. Therefore, in accordance with 10 CFR 26.24(d), actions could be taken during this reporting period on specimens which were presumptive positive for cocaine or marijuana.

During the current reporting period, twelve (12) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS or LGS. Nine (9) of those specimens

screened positive and were confirmed as positive by the HHS-certified laboratory. (One (1) specimen reported as presumptive positive for marijuana was reported as adulterated by the HHS-certified laboratory.) The Medical Review Officer verified the nine (9) specimens as positive. The tenth specimen was verified as adulterated by the Medical Review Officer. No action was taken based upon an unconfirmed presumptive positive test for marijuana as all tests were for pre-access. Two (2) other tests were positive for marijuana on specimens forwarded directly to the HHS-certified laboratory for special processing due to suspected dilution.

During the current reporting period, two (2) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS or LGS. The two (2) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the two (2) specimens as positive. Of the two (2) specimens reported as presumptive positive as a result of on-site screening, one (1) was for pre-access testing and one (1) was for random testing. Unescorted access was temporarily suspended in the case of one (1) individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received.

Reduced Marijuana Cut-off Level

During the period, eight (8) individuals provided specimens at PBAPS that confirmed positive for marijuana. It is estimated that four (4) of those specimens would not have tested positive using the 100 ng/ml immunoassay cut-off level.

ATTACHMENT 2

Limerick Generating Station

Units 1 and 2

Fitness-for-Duty Performance Data

July 2000 through December 2000

**FITNESS FOR DUTY
PERFORMANCE DATA
PERSONNEL SUBJECT TO 10 CFR 26**

Exelon Nuclear

December 31, 2000

Company

Six Months Ending

Limerick Generating Station

Location

David M. Sarley

215-841-5703

Contact Name

Phone (include area code)

Cutoffs: Screen/Confirmation (ng/ml) ☐ Appendix A to 10 CFR 26

Marijuana 50 / 15 Amphetamines 1000 / 500 _____ /

Cocaine 300 / 150 Phencyclidine 25 / 25 _____ /

Opiates 300 / 300 Alcohol (% BAC) 0.04 _____ /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		2229				906	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		44	0			207	3
FOR CAUSE	Post accident	5	0			2	0
	Observed behavior	3	0			4	1
Random		235	0			85	0
Follow-up		33	0			18	0
Other		0	0			0	0
Total		329	0			316	4

Breakdown of Confirmed Positive Tests for Specific Substances:

Limerick Generating Station – December 31, 2000

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal To Test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	0	0						
Long -Term Contractors	0	0	0	0	0	0	0						
Short -Term Contractors	3	0	0	0	0	1	0						
Total	3	0	0	0	0	1	0						A 4

Attachment 2
Summary of Data Analysis and Management Actions
Limerick Generating Station
July – December 2000

I. Initiatives Taken

None.

II. Management Actions

During the period, four (4) contractors tested positive at Limerick Generating Station (LGS), i.e., three (3) pre-access, and one (1) for cause – observed behavior. In accordance with company policy all contractors were denied unescorted access.

III. Events Reported Under 10 CFR 26.73

During the period there were no significant FFD events reported by telephone under 10 CFR 26.73 by LGS.

IV. Audits/Inspections

During the period Nuclear Quality Assurance personnel audited portions of the FFD program as part of the Continuous Assessment Process. Four (4) deficiencies were identified involving: HHS laboratory personnel qualification files; HHS laboratory opiate testing procedure; collection procedures when FFD personnel are tested; and, the testing frequency of personnel in follow-up testing program. Immediate corrective actions were taken and actions to prevent reoccurrence implemented.

V. Random Testing Rate

The company maintains separate testing "pools" for employees and contractors. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and Limerick Generating Station (LGS). Random testing is conducted at an annualized rate of 50%. Actual random testing during the period equaled an annualized rate of 49.6% for employees and 39.5% for contractors. Actual random testing during the year 2000 equaled an annualized rate of 50.2% for employees and 50.7% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

The company has elected to temporarily suspend access for individuals as permitted by 10 CFR 26.24(d).

During the previous 6-month reporting period, (i.e., January - June 2000), 100% of the specimens identified as presumptive positive for cocaine as a result of preliminary on-site screening tests were subsequently reported as positive by the HHS-certified laboratory. The confirmation rate for marijuana was 90%. Therefore, in accordance with 10 CFR 26.24(d), actions could be taken during this reporting period on specimens which were presumptive positive for cocaine or marijuana.

During the current reporting period, twelve (12) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS or LGS. Nine (9) of those specimens

screened positive and were confirmed as positive by the HHS-certified laboratory. (One (1) specimen reported as presumptive positive for marijuana was reported as adulterated by the HHS-certified laboratory.) The Medical Review Officer verified the nine (9) specimens as positive. The tenth specimen was verified as adulterated by the Medical Review Officer. No action was taken based upon an unconfirmed presumptive positive test for marijuana as all tests were for pre-access. Two (2) other tests were reported positive for marijuana on specimens forwarded directly to the HHS-certified laboratory for special processing due to suspected dilution.

During the current reporting period, two (2) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS or LGS. The two (2) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the two (2) specimens as positive. Of the two (2) specimens reported as presumptive positive as a result of on-site screening, one (1) was for pre-access testing and one (1) was for random testing. Unescorted access was temporarily suspended in the case of one (1) individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received.

Reduced Marijuana Cut-off Level

During the period, three (3) specimens were confirmed positive for marijuana at LGS. It is estimated that none of the specimens would have tested positive using the 100 ng/ml immunoassay cut-off level.

ATTACHMENT 3

Mid-Atlantic Regional Operating Group

Corporate and Nuclear Group Headquarters

Fitness-for-Duty Performance Data

July 2000 through December 2000

**FITNESS FOR DUTY
PERFORMANCE DATA
PERSONNEL SUBJECT TO 10 CFR 26**

Exelon Nuclear

December 31, 2000

Company

Six Months Ending

Mid-Atlantic ROG Corporate and Nuclear Group Headquarters

Location

David M. Sarley

215-841-5703

Contact Name

Phone (include area code)

Cutoffs: Screen/Confirmation (ng/ml) ☐ Appendix A to 10 CFR 26

Marijuana 50 / 15 Amphetamines 1000 / 500 _____ /

Cocaine 300 / 150 Phencyclidine 25 / 25 _____ /

Opiates 300 / 300 Alcohol (% BAC) 0.04 _____ /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		2229				906	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		1	0			1	0
FOR CAUSE:	Post accident	0	0			0	0
	Observed behavior	0	0			0	0
Random		64	0			2	0
Follow-up		9	0			4	0
Other		1	0			0	0
Total		75	0			7	0

Breakdown of Confirmed Positive Tests for Specific Substances: Exelon Mid-Atlantic Regional Operating Group Corporate and Nuclear Group Headquarters – December 31, 2000

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal To Test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	0	0						
Long -Term Contractors	0	0	0	0	0	0	0						
Short -Term Contractors	0	0	0	0	0	0	0						
Total	0	0	0	0	0	0	0						A 0

Attachment 3
Summary of Data Analysis and Management Actions
Mid-Atlantic Regional Operating Group
Corporate and Nuclear Group Headquarters
July – December 2000

I. Initiatives Taken

None.

II. Management Actions

There were no positive tests on personnel tested at the Corporate or Nuclear Group Headquarters during the period.

III. Events Reported Under 10 CFR 26.73

There were no events reported during the period.

IV. Audits/Inspections

During the period Nuclear Quality Assurance personnel audited portions of the FFD program as part of the Continuous Assessment Process. Four (4) deficiencies were identified involving: HHS laboratory personnel qualification files; HHS laboratory opiate testing procedure; collection procedures when FFD personnel are tested; and, the testing frequency of personnel in follow-up testing program. Immediate corrective actions were taken and actions to prevent reoccurrence implemented.

V. Random Testing Rate

The company maintains separate testing "pools" for employees and contractors. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and Limerick Generating Station (LGS). Random testing is conducted at an annualized rate of 50%. Actual random testing during the period equaled an annualized rate of 49.6% for employees and 39.5% for contractors. Actual random testing during the year 2000 equaled an annualized rate of 50.2% for employees and 50.7% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

Specimens collected at the Corporate and Nuclear Group Headquarters are forwarded directly to the HHS-certified laboratory for testing. On-site screening is not conducted.

Reduced Marijuana Cut-off Level

There were no positive tests during the period.