

10CFR26.71(d)

February 27, 2002

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001Peach Bottom Atomic Power Station, Units 2 & 3
Facility Operating License Nos. DPR-44 and 56
Docket Nos. 50-277 and 50-278Limerick Generating Station, Units 1 & 2
Facility Operating License Nos. NPF-39 and 85
Docket Nos. 50-352 and 50-353Subject: Fitness-for-Duty Program Performance Data for the Period -
July 2001 through December 2001

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 2001 through December 2001. 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 Mid-Atlantic Regional Operating Group 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 "M. P. Gallagher".

M. P. Gallagher
Director - Licensing
Mid-Atlantic Regional Operating Group

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 2001 through December 2001

FITNESS FOR DUTY PERFORMANCE DATA PERSONNEL SUBJECT TO 10 CFR 26

Exelon Nuclear

Company

December 31, 2001

Six Months Ending

Peach Bottom Atomic Power Station

Location

Dolly Adams

Contact Name

610-765-5014

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		1961				755	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		16	0			1679	32
FOR CAUSE	Post accident	9	0			3	0
	Observed behavior	2	0			5	2
Random		161	0			99	1
Follow-up		36	0			30	0
Other		1	0			0	0
Total		225	0			1816	35

Breakdown of Confirmed Positive Tests for Specific Substances:
Peach Bottom Atomic Power Station -- July 1 - December 31, 2001

	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	20	12	2	0	0	2	2*						A
Total	20	12	2	0	0	2	2						38**

* Includes an adulterated specimen

** One individual tested positive for more than one substance

Attachment 1
Summary of Data Analysis and Management Actions
Peach Bottom Atomic Power Station
July – December 2001

I. Initiatives Taken

The new Exelon Fitness For Duty procedures for the MAROG went into effect on August 17, 2001.

II. Management Actions

During the period, thirty-five (35) contractor employees (i.e., thirty-two (32) pre-access, two (2) for-cause and one (1) random) tested positive at PBAPS. In accordance with company policy, the thirty-five (35) contractor employees were denied unescorted access. One (1) pre-access employee refused a test and subsequently, in accordance with company policy, was also denied access.

III. Events Reported Under 10 CFR 26.73

There were no significant FFD events reported by PBAPS during the period.

IV. Audits/Inspections

During the period, an assessment to evaluate the Fitness For Duty program was conducted by Nuclear Oversight personnel. The assessment found that the Exelon FFD program is and remains strong in accordance with 10 CFR Part 26.

There were no findings generated during the period.

There were five (5) Condition Report (CRs) generated during the assessment period.

1. CR 74737 - New Exelon FFD procedures do not address all the aspects of the testing process including but not limited to specimen collection and alcohol testing. There was no change in the procedure. The contractor utilizes a standard protocol for drug/alcohol testing. There was no impact of the FFD testing activities that were performed.
2. CR 74316 - The FFD Collection Person (CP) was not familiar with the newly issued Exelon FFD program procedures and policies. Based upon a review of the individual's qualifications and a review of the collection activities performed, it was determined that the individual was performing the collection and alcohol testing activities satisfactorily.
3. CR 75854 - FFD Drug Testing Quality Control procedure does not state the minimum percent of the work force population which is to be tested. A review of the FFD performance indicators for Limerick, Kennett Square and Peach Bottom determined that Exelon is testing a minimum of 50% of the work force population; however, the requirement was inadvertently deleted from the new procedure.
4. CR 76777 - Exelon FFD procedure no. SY-MA-102-226 "Drug Testing Quality Control Procedure" does not address the frequency of submitting blind specimens to be tested to the HHS certified laboratory. Nuclear Oversight (NOS) verified that the In-Processor/FFD is submitting blind test specimens to DrugScan on a quarterly basis and records are being maintained which support the frequency and control over blind specimens.
5. CR 74316 - Exelon's Medical Review Officer (MRO) was not provided with the new Exelon Medical Review Requirements procedure in a timely manner. NOS compared the previous PECO MRO procedure responsibilities with the new procedure and determined that the requirements and reporting responsibilities have not changed. There was no impact of the MRO's activities being performed.

Attachment 1 (continued)

V. Random Testing Rate

Exelon Nuclear MAROG Corporate Office, LGS and PBAPS maintain separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS. Actual random testing during the period equaled an annualized rate of 50.8% for employees and 51.1% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

The Peach Bottom and Limerick sites have decided 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 2001, 100 percent 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 specimens identified as presumptive positive for marijuana was 85.7%. Therefore, according to the rule, action could be taken during the current reporting period on specimens identified as presumptive positive for cocaine and marijuana.

During the current reporting period, i.e., July – December 2001, twelve (12) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS and/or LGS. The twelve (12) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the twelve (12) specimens as positive. Of the twelve (12) specimens reported as presumptive positive as a result of on-site screening, one (1) was for-cause testing and eleven (11) were for pre-access testing. Unescorted access was temporarily suspended in the case of one (1) Exelon individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received. The Exelon employee's unescorted access was suspended and the employee referred for treatment/rehabilitation.

During the current reporting period, i.e., July – December 2001, twenty-four (24) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and/or LGS. Twenty-two (22) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. In addition, one (1) contractor specimen reported as a suspected adulteration was reported as adulterated by the HHS-certified laboratory.) The MRO verified twenty-two (22) specimens as positive. Unescorted access was temporarily suspended in the case of one (1) Exelon individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received. The Exelon employee's unescorted access was suspended and the employee referred for treatment/rehabilitation.

Reduced Marijuana Cut-off Level

During the period, there were twenty (20) confirmed positive tests for marijuana at PBAPS. It is estimated that only one of the specimens would 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 2001 through December 2001

FITNESS FOR DUTY PERFORMANCE DATA PERSONNEL SUBJECT TO 10 CFR 26

Exelon Nuclear
Company

December 31, 2001
Six Months Ending

Limerick Generating Station
Location

Dolly Adams

Contact Name

610-765-5014

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		1961				755	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		33	0			127	1
FOR CAUSE	Post accident	1	0			8	0
	Observed behavior	4	0			2	0
Random		212	0			78	0
Follow-up		27	1			10	0
Other		13	0			3	0
Total		290	1			228	1

Breakdown of Confirmed Positive Tests for Specific Substances:

Limerick Generating Station -- July 1 - December 31, 2001

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

* Includes an adulterated specimen.

Attachment 2
Summary of Data Analysis and Management Actions
Limerick Generating Station
July – December 2001

I. Initiatives Taken

The new Exelon Fitness For Duty procedures for the MAROG went into effect on August 17, 2001.

II. Management Actions

During the period, one (1) contractor employee and one (1) Exelon employee tested positive at LGS. In accordance with company policy, the contractor employee was denied unescorted access. Unescorted access was temporarily suspended in the case of the one (1) Exelon individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received. The Exelon employee's unescorted access was suspended and the employee referred for treatment/rehabilitation. (In addition, one (1) contractor specimen reported as presumptive positive for marijuana was reported as adulterated by the HHS-certified laboratory.)

III. Events Reported Under 10 CFR 26.73

There were no significant FFD events reported by LGS during the period.

IV. Audits/Inspections

During the period, an assessment to evaluate the Fitness For Duty program was conducted by Nuclear Oversight personnel. The assessment found that the Exelon FFD program is and remains strong in accordance with 10 CFR Part 26.

There were no findings generated during the period.

There were five (5) Condition Reports (CRs) generated during the assessment period.

1. CR 74737 - New Exelon FFD procedures do not address all the aspects of the testing process including but not limited to specimen collection and alcohol testing. There was no change in the procedure. The contractor utilizes a standard protocol for drug/alcohol testing. There was no impact of the FFD testing activities that were performed.
2. CR 74316 - The FFD Collection Person (CP) was not familiar with the newly issued Exelon FFD program procedures and policies. Based upon a review of the individual's qualifications and a review of the collection activities performed, it was determined that the individual was performing the collection and alcohol testing activities satisfactorily.
3. CR 75854 - FFD Drug Testing Quality Control procedure does not state the minimum percent of the work force population which is to be tested. A review of the FFD performance indicators for Limerick, Kennett Square and Peach Bottom determined that Exelon is testing a minimum of 50% of the work force population; however, the requirement was inadvertently deleted from the new procedure.
4. CR 76777 - Exelon FFD procedure no. SY-MA-102-226 "Drug Testing Quality Control Procedure" does not address the frequency of submitting blind specimens to be tested to the HHS certified laboratory. Nuclear Oversight (NOS) verified that the In-Processor/FFD is submitting blind test specimens to DrugScan on a quarterly basis and records are being maintained which support the frequency and control over blind specimens.
5. CR 74316 - Exelon's Medical Review Officer (MRO) was not provided with the new Exelon Medical Review Requirements procedure in a timely manner. NOS compared the previous PECO MRO procedure responsibilities with the new procedure and determined that the requirements and reporting responsibilities have not changed. There was no impact of the MRO's activities being performed.

Attachment 2 (continued)

V. Random Testing Rate

Exelon Nuclear MAROG Corporate Office, LGS and PBAPS maintain separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS. Actual random testing during the period equaled an annualized rate of 50.8% for employees and 51.1% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

The Peach Bottom and Limerick sites have decided 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 2001, 100 percent 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 specimens identified as presumptive positive for marijuana was 85.7%. Therefore, according to the rule, action could be taken during the current reporting period on specimens identified as presumptive positive for cocaine and marijuana.

During the current reporting period, i.e., July – December 2001, twelve (12) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS and/or LGS. The twelve (12) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the twelve (12) specimens as positive. Of the twelve (12) specimens reported as presumptive positive as a result of on-site screening, one (1) was for-cause testing and eleven (11) were for pre-access testing. Unescorted access was temporarily suspended in the case of one (1) Exelon employee pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received. The Exelon employee's unescorted access was suspended and the employee referred for treatment/rehabilitation.

During the current reporting period, i.e., July – December 2001, twenty-four (24) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and/or LGS. Twenty-two (22) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. In addition, one (1) contractor specimen reported as a suspected adulteration was reported as adulterated by the HHS-certified laboratory.) The MRO verified twenty-two (22) specimens as positive. Unescorted access was temporarily suspended in the case of one (1) Exelon employee pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received. The Exelon employee's unescorted access was suspended and the employee referred for treatment/rehabilitation.

Reduced Marijuana Cut-off Level

During the period, there were two (2) confirmed positive tests 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 Headquarters

(Kennett Square)

And Corporate

(2301 Market Street, Philadelphia, PA)

Fitness-For-Duty Performance Data

July 2001 through December 2001

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

Exelon Nuclear

Company

December 31, 2001

Six Months Ending

Corporate and Mid-Atlantic Regional Operating Group Headquarters

Location

Dolly Adams

Contact Name

610-765-5014

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		1961				755	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		4	0			251	0
FOR CAUSE	Post accident	0	0			0	0
	Observed behavior	1	0			0	0
Random		75	1			4	0
Follow-up		8	0			0	0
Other		1	0			0	0
Total		89	1			255	0

Corporate and Mid-Atlantic Regional Operating Group Headquarters -- July 1 - December 31, 2001

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Attachment 3
Summary of Data Analysis and Management Actions
Corporate and Mid-Atlantic ROG Headquarters
July – December 2001

I. Initiatives Taken

The new Exelon Fitness For Duty procedures for the MAROG went into effect on August 17, 2001.

II. Management Actions

There was one (1)

III. Events Reported Under 10 CFR 26.73

There were no significant FFD events reported by the Corporate and Mid-Atlantic ROG Headquarters during the period.

IV. Audits/Inspections

During the period, an assessment to evaluate the Fitness For Duty program was conducted by Nuclear Oversight personnel. The assessment found that the Exelon FFD program is and remains strong in accordance with 10 CFR Part 26.

There were no findings generated during the period.

There were five (5) Condition Reports (CRs) generated during the assessment period.

1. CR 74737 - New Exelon FFD procedures do not address all the aspects of the testing process including but not limited to specimen collection and alcohol testing. There was no change in the procedure. The contractor utilizes a standard protocol for drug/alcohol testing. There was no impact of the FFD testing activities that were performed.
2. CR 74316 - The FFD Collection Person (CP) was not familiar with the newly issued Exelon FFD program procedures and policies. Based upon a review of the individual's qualifications and a review of the collection activities performed, it was determined that the individual was performing the collection and alcohol testing activities satisfactorily.
3. CR 75854 - FFD Drug Testing Quality Control procedure does not state the minimum percent of the work force population which is to be tested. A review of the FFD performance indicators for Limerick, Kennett Square and Peach Bottom determined that Exelon is testing a minimum of 50% of the work force population; however, the requirement was inadvertently deleted from the new procedure.
4. CR 76777 - Exelon FFD procedure no. SY-MA-102-226 "Drug Testing Quality Control Procedure" does not address the frequency of submitting blind specimens to be tested to the HHS certified laboratory. Nuclear Oversight (NOS) verified that the In-Processor/FFD is submitting blind test specimens to DrugScan on a quarterly basis and records are being maintained which support the frequency and control over blind specimens.
5. CR 74316 - Exelon's Medical Review Officer (MRO) was not provided with the new Exelon Medical Review Requirements procedure in a timely manner. NOS compared the previous PECO MRO procedure responsibilities with the new procedure and determined that the requirements and reporting responsibilities have not changed. There was no impact of the MRO's activities being performed.

Attachment 3 (continued)

V. Random Testing Rate

Exelon Nuclear MAROG Corporate Office, LGS and PBAPS maintain separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS. Actual random testing during the period equaled an annualized rate of 50.8% for employees and 51.1% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

Specimens collected at the Corporate and Mid-Atlantic ROG Headquarters are forwarded directly to the HHS-certified laboratory for testing. On-site screening is not performed.

Reduced Marijuana Cut-off Level

There were no confirmed positive tests for marijuana at Corporate and Mid-Atlantic ROG Headquarters during the period.