



**Pacific Gas and
Electric Company®**

August 26, 2005

PG&E Letter DCL-05-097

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U.S. Nuclear Regulatory Commission
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Docket No. 50-275, OL-DPR-80

Docket No. 50-323, OL-DPR-82

Diablo Canyon Units 1 and 2

Semi-Annual Fitness for Duty Performance Report for the Period of January through
June 2005

Dear Commissioners and Staff:

Pursuant to 10 CFR 26.71(d), PG&E is submitting the enclosed Fitness for Duty (FFD) Performance Report for the period January through June 2005. The performance data have been compiled on the standard forms developed by the Nuclear Energy Institute and are provided in Enclosure 1. As noted in Enclosure 1, individuals being screened for initial unescorted access (pre-employment testing 30 days prior to being cleared) are tested at lower cut-off levels for marijuana and amphetamines, and for two additional substances. This testing is reported under the pre-access category and is conducted in accordance with 10 CFR 26.

Statistical analysis of the data was conducted and the results are provided in Enclosure 2. During this period, no licensed operators or supervisors tested positive. There were no significant FFD event reports made during the period. Enclosure 3 provides a summary of program activities for the reporting period.

If you have any questions regarding the information enclosed or other FFD Program activities, please contact William F. Ryan, Access/FFD Supervisor, at (805) 545-3329.

Sincerely,


James R. Becker

swH/R0271656

Enclosures

cc: Diablo Distribution
cc/enc: Richard E. Enkeboll, NEI
Terry W. Jackson
Bruce S. Mallett
Girija S. Shukla

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**FITNESS FOR DUTY PERFORMANCE DATA
JANUARY THROUGH JUNE 2005**

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

<u>PACIFIC GAS AND ELECTRIC COMPANY</u> Company	<u>June 30, 2005</u> 6 Months Ending
<u>DIABLO CANYON POWER PLANT</u> Location	
<u>WILLIAM F. RYAN, ACCESS/FITNESS FOR DUTY SUPERVISOR</u> <u>(805) 545-3329</u> Contact Name Phone (including area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10 CFR 26	
Pre-employment Screening	
Marijuana 20 / 10	Amphetamines 300 / 250
Cocaine 300 / 150	Phencyclidine 25 / 25
Opiates 300 / 300	Alcohol (% BAC) 0.04%
	Barbiturates 300 / 250
	Benzodiazepines 300 / 250

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access: 1758***		1459		299*			
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		107	0	31	1	88	1
For Cause	Post-accident	0	0	0	0	0	0
	Observed behavior	0	0	0	0	0	0
Random		465	0	43	0	31	0
Follow-up		34	0	6	0	6	0
Other**		6	0	15	0	7	0
Total		612	0	95	1	132	1

* Includes long- and short term contractors; differentiation between the two is not obtainable

** Testing of FFD Administrative Staff

*** Includes individuals added to the random pool after completing a pre-access test.

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Amphetamines	Alcohol	Refusal to Test	Total
Licensee Employees	0	0	0	0	0	0
Long-Term Contractors	1	0	0	0	0	1
Short-Term Contractors	0	0	1	0	0	1
Total	1	0	1	0	0	2

**STATISTICAL ANALYSIS FOR REPORTING PERIOD
JANUARY THROUGH JUNE 2005**

Analysis of the data indicates that 30.7 percent of the average eligible population was randomly tested during the period January through June 2005.

The overall positive test rate for this period was 0.24 percent. There were no random positive test results during this reporting period.

PG&E submitted blind performance specimens in accordance with 10 CFR 26, Appendix A, Section 2.8 (e)(2) requirements. There were no reportable events.

FITNESS FOR DUTY PROGRAM ACTIVITY REPORT JANUARY THROUGH JUNE 2005

Activity 1

In January 2005, it was discovered that FFD follow up testing had not been completed as required by the Medical Review Officer (MRO). This issue was entered into the plant corrective action program.

One individual subjected to follow up program was changed from a monthly to a twice monthly testing frequency by the MRO. However the increased test frequency had not been implemented, the individual continued to be tested one time per month.

This discrepancy was found by FFD program personnel and all other follow up records were reviewed to determine if it was isolated to one file only. The file review showed that only the one file was not set up to meet the MRO required test frequency.

The apparent cause is the FFD program staff did not update the individual's "Follow-Up Tracking Sheet" to show that the number of monthly follow up tests had been increased from one per month to two per month.

To address this issue two actions were taken: (1) the FFD program staff was made aware of this issue and (2) a work instruction including a checklist was developed and implemented for the FFD program staff to use whenever an individual's follow up program is changed.

Activity 2

In March 2005, it was noted that a certified true copy of a chain of custody form for a performance sample spiked with Secobarbital and Phenobarbital was signed off with a negative test result by the certifying scientist. This was self identified by the Department of Health and Human Services certified laboratory and a corrected chain of custody form was provided by the laboratory without prompting. It should be noted that the specimen was reported as positive for Secobarbital and Phenobarbital on the laboratory test report, which is transmitted separately from the chain of custody form.

The FFD program staff reported this issue to laboratory management and entered it into the plant problem reporting system.

The laboratory responsible person reviewed this issue and reported that; "The custody and control form was originally annotated as negative on 3/12/05 and then corrected on 3/15/05. I have discussed this issue with the reviewer."