



FirstEnergy Nuclear Operating Company

Perry Nuclear Power Station
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Perry, Ohio 44081

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United States Nuclear Regulatory Commission
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Perry Nuclear Power Plant
Docket No. 50-440
Subject: Semiannual Fitness For Duty Report

Ladies and Gentlemen:

In accordance with the requirements of 10CFR26.71(d), "Recordkeeping Requirements," the Semiannual Fitness for Duty Report is being submitted for the Perry Nuclear Power Plant. This report covers the time period of January 1, 2006 through June 30, 2006.

Attachment 1 provides the Fitness for Duty Program performance data regarding testing results. Attachment 2 provides additional information regarding reported events and management actions taken in response to positive results. The provisions of the Fitness for Duty Program apply to persons granted unescorted access to the Protected Area of the plant, as well as to licensee, vendor, and contractor personnel required to physically report to the Technical Support Center or the Emergency Operations Facility in accordance with the Emergency Plan and associated implementing procedures.

If there are any questions or if additional information is required, please contact Mr. Jeffrey Lausberg, Manager – Regulatory Compliance, at (440) 280-5940.

Very truly yours,

Attachments

cc: NRC Project Manager

NRC Resident Inspector Office

NRC Region III

A021

Fitness for Duty Program Performance Data Personnel Subject to 10CFR26

NOP-LP-1002-01 Rev. 00

FirstEnergy Corporation (FirstEnergy Nuclear Operating Company)
Company

June 30, 2006
6 Months Ending

Perry Nuclear Power Plant - 10 Center Road - Perry, Ohio 44081
Location

Maureen T. Gilday-Gulliford, Supervisor, Nuclear Access
Contact Name

(440) 280-5830
Phone (include area code)

Cutoffs: Screen/Confirmation (ng/ml) ☐ Appendix A to 10CFR26

Marijuana	100/15	Amphetamines	1,000/500
Cocaine	300/150	Phencyclidine	25/25
Opiates	300/300	Alcohol (%BAC)	.04%
or			.02% (work status 2 hrs. greater)
			.03% (work status 1 hr. or greater)

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		916		N/A		152	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		146	0			151	1
For Cause	Post accident	0	0			0	0
	Observed behavior	5	3			1	0
Random		244	0			34	0
Follow-up		17	0			8	0
Other		0	0			0	0
Total		412	3			194	1

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	1	0	0	0	2	0					
Long-Term Contractors	0	0	0	0	0	0	0					
Short-Term Contractors	0	0	0	0	0	0	1					
Total	0	1	0	0	0	2	1					4

Management Actions Taken

Drug and alcohol testing results for the reporting period are described in Attachment 1.

Three (3) licensee employees tested positive for illegal drugs or alcohol during this reporting period. One (1) licensee employee, whose unescorted access was placed on administrative hold due to an offsite arrest, was subjected to for cause testing, which resulted in a confirmed positive drug result. The licensee employee was denied unescorted access to the Protected Area. Pursuant to Nuclear Operating Procedure, NOP-LP-1002, "Fitness for Duty Program," requirements, the individual was informed of his right to appeal and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, the individual did exercise his right to appeal, which resulted in the upholding of the denial status. Two (2) licensee employees, who held unescorted access, were subjected to for cause testing, which resulted in a confirmed positive alcohol level. The licensee employees were denied unescorted access to the Protected Area. Pursuant to Nuclear Operating Procedure NOP-LP-1002, "Fitness for Duty Program," requirements, the individuals were informed of their right to appeal and of the procedural requirements in order to re-establish unescorted access to the Protected Area. Both individuals initiated steps in order to re-establish unescorted access to the Protected Area. Both individuals were mandated to the Employee Assistance Program (EAP), access authorization suitability was re-established, and their unescorted access was reinstated.

One (1) contractor employee, who did not hold unescorted access, attempted to subvert his preaccess urine specimen, which is considered a violation of the Fitness for Duty Program during this reporting period. The contractor employee was denied unescorted access to the Protected Area for minimum of three (3) years. Pursuant to Nuclear Operating Procedure NOP-LP-1002, "Fitness for Duty Program," requirements, the individual was informed of their right to appeal and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, the contractor employee has not exercised his right to appeal.

As a result of a Fitness for Duty Program concern, twelve (12) individuals were subject to unannounced follow-up testing during this reporting period. All testing results were negative.

Licensee's Medical Review Officer identified a discrepancy with the primary laboratory's certifying scientist notation on the federal drug testing custody and control form, and the clinical laboratory report result. The certifying scientist recorded the specimen result on the federal drug testing custody and control form as dilute, and the clinical laboratory report result was negative. It was determined the specimen was negative and the certifying scientist had made an administrative error when recording the result on the federal drug testing custody and control form. The occurrence was isolated and administrative in nature. As a result, the certifying scientist was counseled regarding the accuracy of recording results.

Initiatives Taken

A new revision for Nuclear Operating Procedure, NOP-LP-1002, "Fitness for Duty Program," was implemented during this reporting period. Highlights of the scope of revision are:

- New Fitness for Duty Evaluation section and implementation of the fleet Fitness for Duty Evaluation form to ensure consistent fitness for duty evaluations when an incident/near misses occurs
- Identified the use of the electronic database when completing Annual Supervisor Reviews
- Referenced OSHA recordables/potential recordables in the For Cause testing section
- Verbiage changes made to Working Hour Guidelines for clarity purposes and implemented fleet Working Hour Deviation Request

Reported Events

None