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Exelon Nuclear

10 CFR 26.719(c)

August 8, 2011

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

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: 10 CFR 26.719(c) Report
FFD Testing Facility Analytical Run Exceeded 8-hour Time Limit

Pursuant to 10 CFR 26.719(c), "*Drug and alcohol testing errors,*" Exelon Generation Company, LLC (Exelon), is submitting information for Limerick Generating Station, Units 1 and 2 (LGS), concerning unsatisfactory performance in quality control testing during an analytical run. A newly trained Technician for Professional On-Site Testing (POST) exceeded the 8-hour time limit for an analytical run when running Fitness for Duty (FFD) samples as required by 10 CFR 26.137(b)(2)(i).

10CFR26.719(c) stipulates in part that licensees shall notify the NRC within 30 days of completing an investigation of any testing errors or unsatisfactory performance discovered in performance testing at either a licensee testing facility or an HHS-certified laboratory, in the testing of quality control or actual specimens that could adversely reflect on the integrity of the random selection or testing process.

Attachment 1 to this letter provides information and details concerning unsatisfactory performance discovered in quality control of testing and the associated corrective actions.

There are no regulatory commitments contained within this letter.

If you have any questions or require additional information, please contact Frank Mascitelli at 610-765-5512.

Respectfully,

Michael D. Jesse
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachment 1: FFD Testing Facility Analytical Run Exceeded 8-Hour Time Limit

cc: NRC Regional Administrator, Region I w/attachment
NRC Senior Resident Inspector - LGS "

ATTACHMENT 1

Limerick Generating Station, Units 1 and 2

Docket Nos. 50-352 and 50-353

10 CFR 26.719(c) Report
FFD Testing Facility Analytical Run Exceeded 8-Hour Time Limit

Introduction

A newly trained technician for Professional On-Site Testing (POST), the vendor Exelon has contracted with for performing drug and alcohol collection and testing, exceeded the 8-hour time limit for an analytical run requirement when running FFD samples. It is required per 10 CFR 26 that the Technician calibrate the FFD sample analyzer equipment after 8 hours to assure no matters could adversely reflect on the integrity of the testing process. The final testing of specimens for the analytical run exceeded the time limit by 57 minutes.

Investigation

On June 20, 2011, the POST Technician (Technician) was at the Limerick Generating Station to perform the routine process for on-site collection and testing of FFD samples. The Technician calibrated the analyzer equipment and pre-access testing samples were collected and tested. There were additional random collections scheduled to begin late morning and the Technician tested those specimens.

On June 21, 2011, the Supervising Technician checked the Technician's work and discovered that the test run exceeded the 8-hour time limit for an analytical run. When the Technician was asked why she didn't re-calibrate the equipment, the Technician said that the samples were on the wheel before the 8-hour time limit. The Technician thought the definition of the 8-hour time limit only included the time the specimens were beginning testing and not at the conclusion.

There were a total of 15 specimens that were initialized before the 8-hour time limit expired; however, several of the 15 specimens completed the process after the 8-hour time limit, with the final one at approximately 57 minutes over.

Of the samples that did not complete the process within the 8-hour time limit, all of the samples were negative except for one. That sample had to be sent out to the HHS Certified Lab for further testing. Two of the 15 negative samples were also sent out to the HHS Certified Lab as quality control samples, per standard procedure and process. The HHS Certified Lab verified on-site testing results for all samples. This demonstrated that the calibrations of the V-Twin analyzer equipment were still good and within acceptable range.

The HHS certified laboratory technical expert was consulted and validated that the calibration and controls that were in place were still being verified accurate and that the clinical impact is very low because the quality control samples within the analytical run were accurate and provided validation that the calibration was still performing as expected.

The standard procedure and process in accordance with 10 CFR Part 26 is to discard all samples that test negative. Twelve of the 15 samples were not retained (3 were sent to the HHS certified laboratory as identified above). Although not required, individuals were re-assigned a random test to assure no matters could adversely reflect on the integrity of the testing process. All re-collected specimens were negative.

Corrective Actions

Exelon has entered this identified deficiency into the Corrective Action Program (CAP) under Issue Report (IR) 1231323. The following actions have been taken or planned:

- The POST Technician's qualifications were initially removed and the Technician was re-trained.
- A Read & Sign document was issued to POST technicians to understand the definition for the 8-hour time limit for an analytical run.
- Procedure SY-AA-102-244, "On-Site Collection Facility Quality Control Program," will be revised to reflect more detailed guidance for the condition when running samples exceed the 8-hour time limit for an analytical run, then the technician must re-calibrate the analyzer equipment. All specimens and quality control samples must be finished processing within the 8 hours.
- The training material will be reviewed and revised, as necessary, to ensure that the 8-hour analytical run and the time frame of the 8 hours are appropriately detailed.