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AUTH. NAME FLOYD, S.D. AUTHOR AFFILIATION Carolina Power & Light Co.
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Self Report

SUBJECT: Forwards semiannual fitness-for-duty program performance data covering Jul-Dec 1990.

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Carolina Power & Light Company

FEB 28 1991

SERIAL: NLS-91-051
10CFR26

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324/LICENSE NOS. DPR-71 AND DPR-62

SEMIANNUAL 10CFR26 FITNESS-FOR-DUTY PROGRAM DATA

Gentlemen:

Pursuant to 10CFR26.71(d), Carolina Power & Light Company (CP&L) hereby provides the required semiannual Fitness-for-Duty Program performance data.

The enclosed report, submitted on standardized Nuclear Management and Resources Council (NUMARC) forms, provides Fitness-for-Duty Program performance data for CP&L and contractor personnel subject to 10CFR26. This report covers the period July 1, 1990 through December 31, 1990.

Please contact me at (919) 546-6901 if you require additional information concerning this report.

Yours very truly,

S. D. Floyd

Manager

Nuclear Licensing Section

DBB/jbw (1000GLU)

Enclosures

cc: Mr. R. A. Becker
Mr. S. D. Ebnetter
Mr. L. Garner (NRC - HBR)
Mr. N. B. Le
Mr. R. Lo
Mr. J. E. Tedrow

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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PDR ADOCK 05000261
R PDR

CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program

(July 1, 1990 - December 31, 1990)

ATTACHMENT

CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program
(July 1, 1990 - December 31, 1990)

CORPORATE PROGRAM EFFECTIVENESS

The program's goals address the following areas:

- Use of selected illicit drugs, eg., marijuana, cocaine, opiates, phencyclidine, amphetamines
- Licit drug abuse
- Emotional/psychological stress
- Fatigue

The boundaries of the Fitness For Duty Program are:

- Only those employees and contractors who have unescorted access to the Company's nuclear plants or are unbadged emergency responders.

The Goals that the Fitness For Duty Program is designed to protect or enhance are:

- Public health and safety
- Productivity

The program's goal and objectives are:

- A goal of achieving a drug-free workplace and a workplace free of the effects of such substances.
- Provide reasonable assurance that nuclear power plant personnel will perform their tasks in a reliable and trustworthy manner and are not under the influence of any substance, legal or illegal, or mentally or physically impaired from any cause, which in any way adversely affects their ability to safety and competently perform their duties.
- Provide reasonable measures for the early detection of persons who are not fit to perform activities within the scope of this Part.

CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program (July 1, 1990 - December 31, 1990)

The following initiatives were taken to strengthen the Company's FFD Program during this reporting period. Site specific actions follow this generic reporting applicable to all three nuclear plants and to our Corporate Headquarters.

- A number of Fitness For Duty Program enhancements were made during this reporting period. These management actions are:
 - 1) The Company has implemented "special processing" of specimens whose creatinine falls below the .2g/L in an effort to minimize observed recollections. If special processing to the lower limits of Quantification (LOQ) determines that no illegal substance is present in the specimen, then the specimen is determined to be negative by the MRO. Should "special processing" determine the presence of either marijuana or cocaine at LOQ, then the test results are referred to the MRO for final determination and confirmation.
 - 2) We have investigated automating our Authorization Form for FFD Testing and have concluded that at this time, the cost/benefit does not justify the expenditure.
 - 3) We have initiated efforts to obtain FFD report summaries off the mainframe instead of through downloading from the mainframe to a personal computer. The effect of this will be to receive summary reports on a more frequent and timely basis, particularly as the historical data accumulates.
 - 4) In response to a QA nonconformance, certified calibrated thermometers have been placed in the refrigeration units, both short- and long-term storage.
 - 5) A one-page "flyer" was developed to inform individuals to be pre-access tested under FFD about our drug & alcohol testing program.
 - 6) The collection facility staff attended refresher training on the collection and alcohol instrument testing processing.
 - 7) The FFD Drug & Alcohol Testing Consent Form has been revised to allow the confirmed test results for contractors to be provided to the contract worker.
 - 8) A Continual Behavioral Observation Program document has been developed. The purpose of this document is to answer the who, what, when, where, and how of the CBO Program.

- 9) The collection site procedures have been reviewed and revised by the FFD Administrators and collection facility staff.
- 10) Revised FFD Policy and Procedures were distributed to all supervisors and a revised Drug & Alcohol Reference Booklet was distributed to all non-supervisors.
- 11) A self-assessment and cross reference was completed of our Policies and Procedures to the FFD, NRC Regulations.
- 12) Arrangements were finalized for disposing of split samples through a waste disposal vendor.
- 13) An FFD Appeals process procedure was finalized. This procedure basically covers the responsibilities of the Appeals Panel.
- 14) An Infrequent Access Procedure was developed for Contractors. This effort is to ensure appropriate random testing of contractors.
- 15) A form was developed and implemented to obtain a written and signed statement from the collection facility staff person designee to ensure that the individual is not color blind.
- 16) The lights are being left on in the collection facility at night, even though the facility may not be operating. This is to increase the awareness and perception that the facility operates around the clock.
- 17) In response to feedback received about the length of worker and supervisor training programs as well as increased program awareness, lesson plans were revised to provide more focused and shorter training sessions.

CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program
(July 1, 1990 - December 31, 1990)

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Correct Program Weaknesses

- 1) A review of our random notification process was undertaken and resulted in a decision to normally provide same day notification to the supervisor that his or her employee is selected and scheduled for random testing. Previously, several days prior notice may have been provided to the supervisor. The notification to the employee remains the same which is generally one-hour notice but not to exceed two hours prior to scheduled testing. This change was effective January 28, 1991.
- 2) Effective December 20, 1990, the FFD Policy for Appeals has been revised from allowing FFD Appeals only when one, or both, of the following is an issue; (1) Procedures used during chemical testing including sample collection and (2) the chain-of-custody form or other documentation completed during chemical testing to "a worker within the scope of the FFD Program may appeal a positive drug or alcohol determination".
- 3) Effective October 8, 1990, Suitable Inquiry procedures were revised to obtain Suitable Inquiry not only from the employer but also from the licensee if the individual had previously worked at a nuclear plant.
- 4) Measures were implemented on August 7, 1990, to obtain the creatinine concentration of specimens submitted for testing. The reason for this oversight was as a mis-interpretation of the regulation.

CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program
July 1, 1990 - December 31, 1990

SUMMARY OF MANAGEMENT ACTIONS

Lessons Learned or Trends

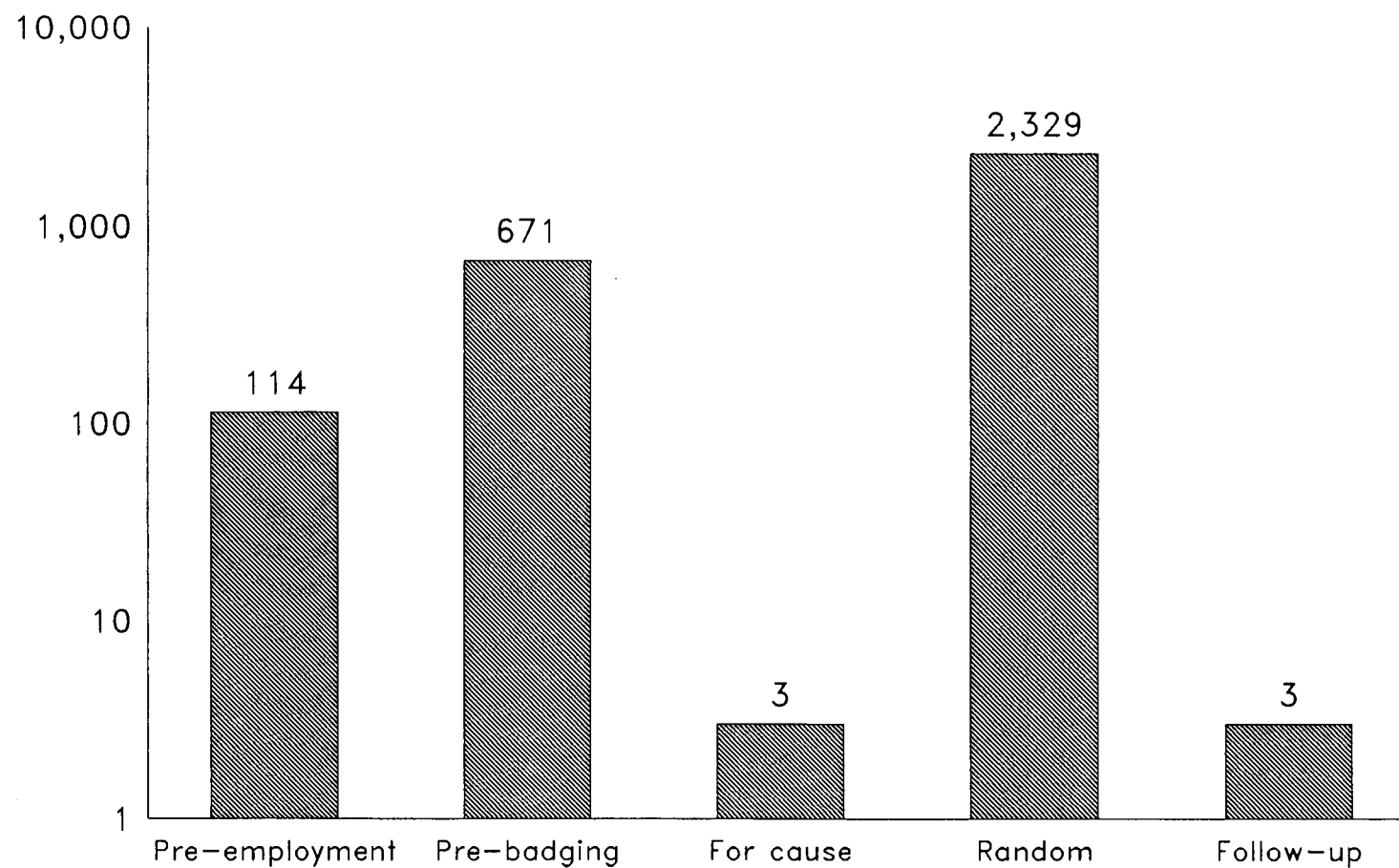
- | | |
|---------------------------|--|
| CHARTS 1 & 2 | <ul style="list-style-type: none">(a) More For-Cause testing was done during the period of July 1, 1990 to December 31, 1990 than January 3, 1990 to June 30, 1990.(b) 464 random tests are attributed to the increased number with unescorted access due to outages from July 1, 1990 - December 31, 1990. |
| CHARTS 3 & 4 | <ul style="list-style-type: none">(a) Random test percentage positives decreased from 47% in the first half of 1990 to 18% in the second half.(b) Pre-badging test percentage positives decreased from .6% in the first half of 1990 to .42% in the second half. |
| CHARTS 5 & 6 | No significant observation. |
| CHARTS 7 & 8 | There were more alcohol violations during the second half of the year while the number of drug violations stayed about the same. |
| CHARTS 9 & 10 | Marijuana violations decreased the second half of the year while cocaine and alcohol increased. |
| CHARTS 11 & 12 | Testing data is being gathered to assist in evaluating the peaks on Tuesday or Thursday. |
| CHARTS 13 & 14 | During the period from January 3, 1990 - June 30, 1990, there were six employee violations versus two for the period from July 1, 1990 to December 31, 1990. This would seem to indicate a response by employees to achieve a drug-free workplace. |

CHARTS 15 & 16 No significant observation.

CONCLUSION The number of random positives decreased during the second half of the year while the number of pre-badging positives increased. This trend indicates that we are striving towards the goals of a drug-free workplace.

CP&L Fitness for Duty Program

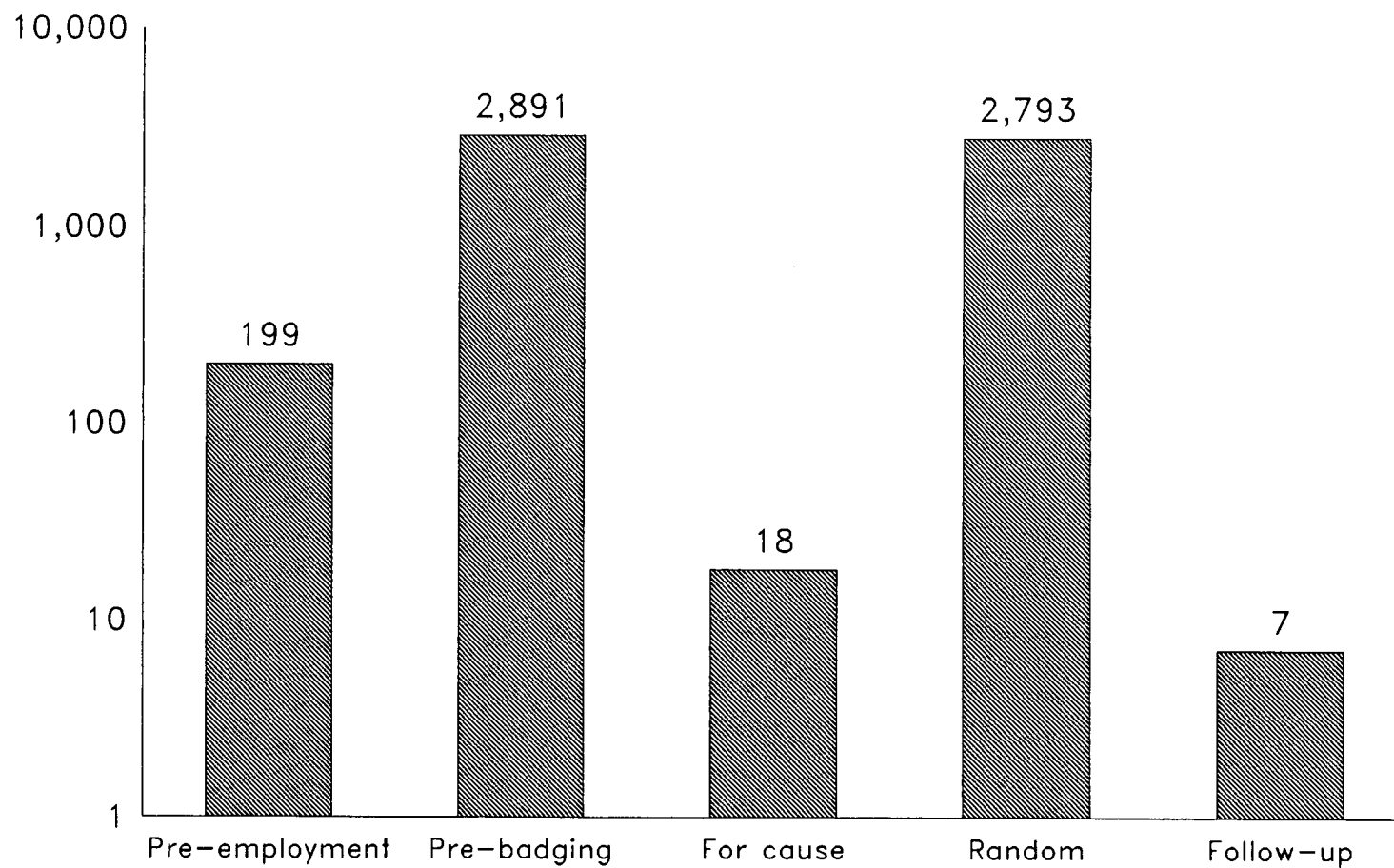
Number of Tests by Type



For January 3, 1990 - June 30, 1990
Total number of tests = 3,120

CP&L Fitness for Duty Program

Number of Tests by Type

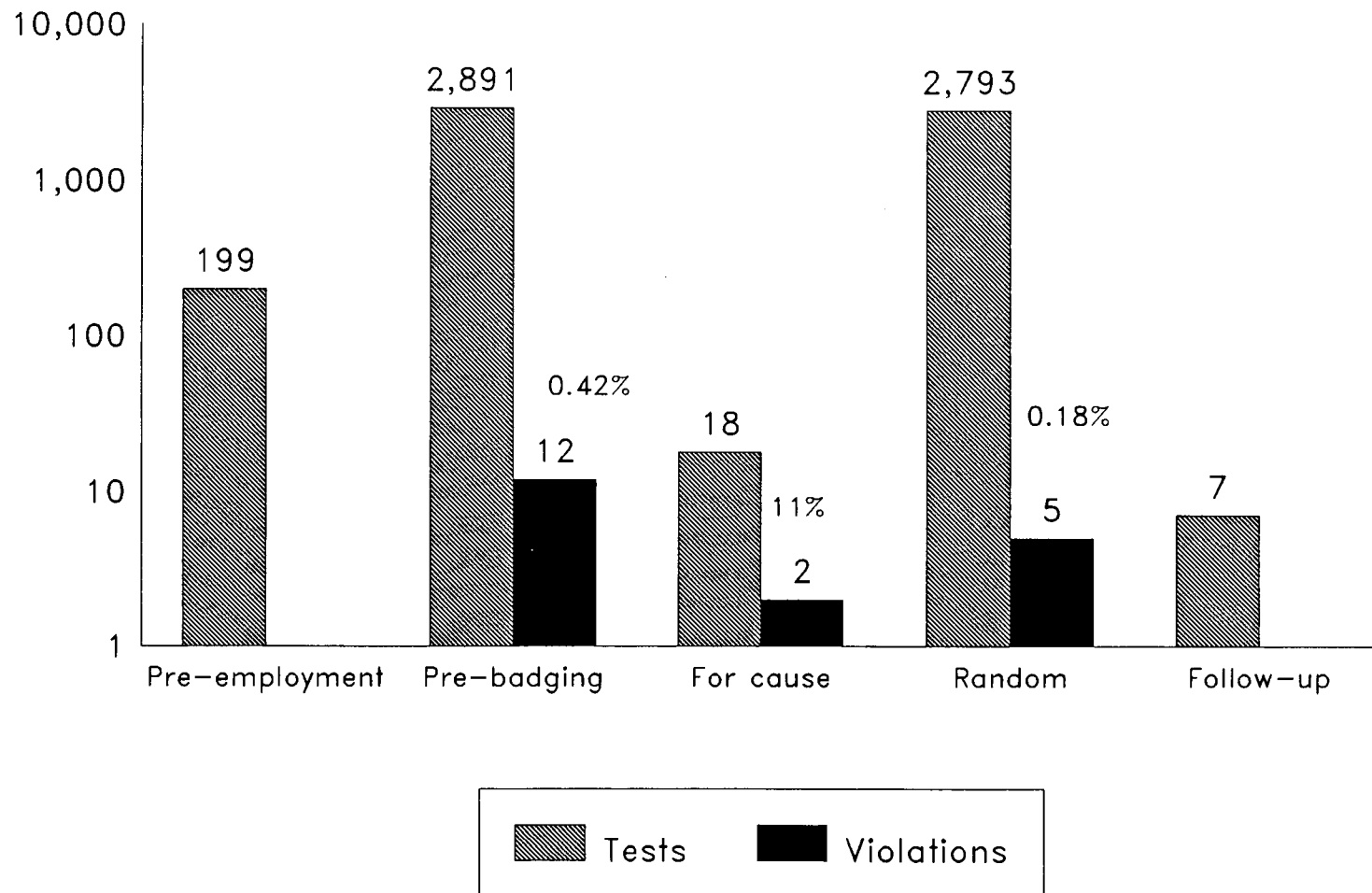


For July 1, 1990 - December 31, 1990

Total number of tests = 5,908

CP&L Fitness for Duty Program

Number of Tests and Violations



For July 1, 1990 – December 31, 1990

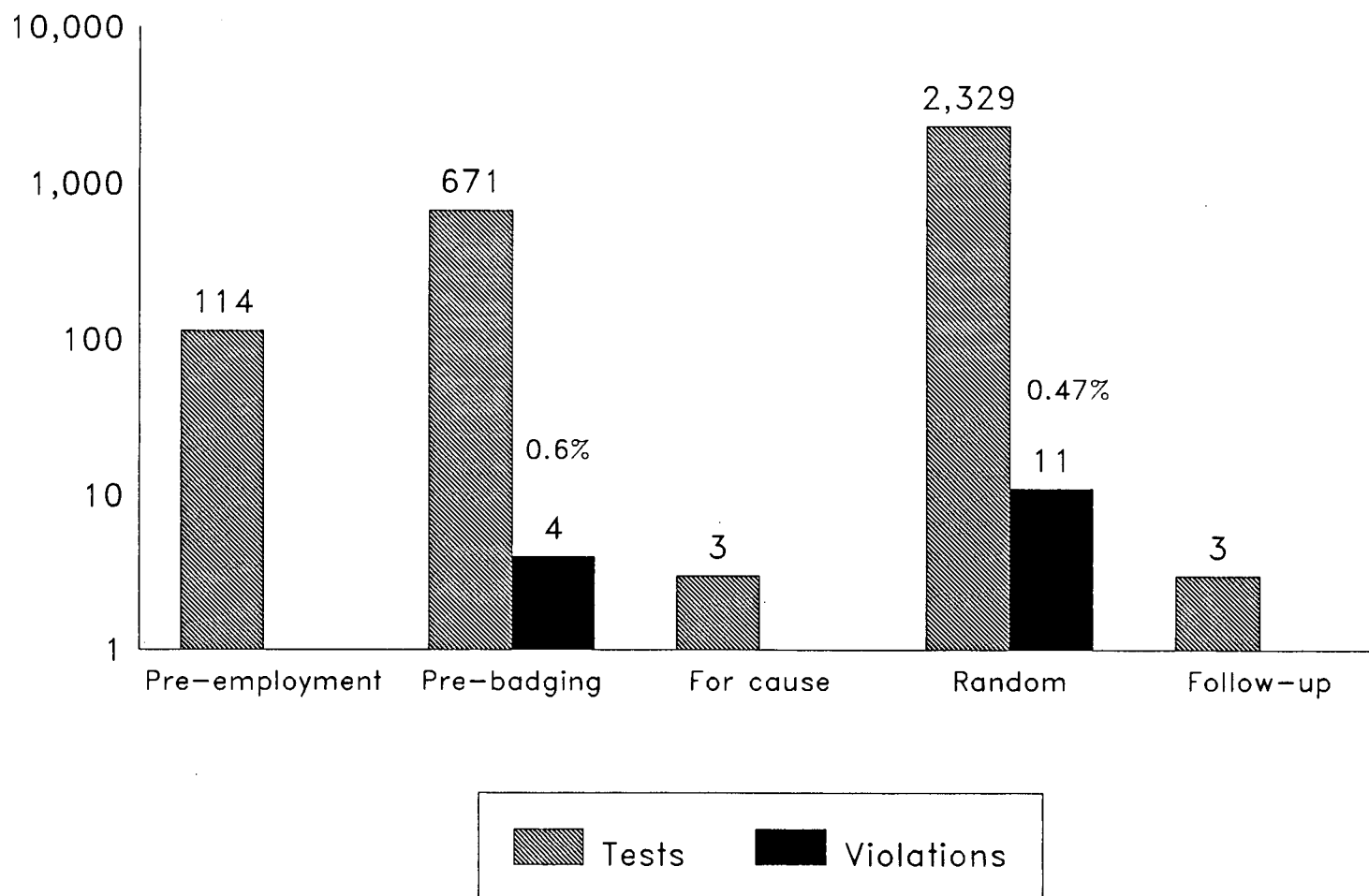
Total number of tests = 5,908

19 violations resulting from testing 0.32%

CHART 4

CP&L Fitness for Duty Program

Number of Tests and Violations



For January 3, 1990 – June 30, 1990

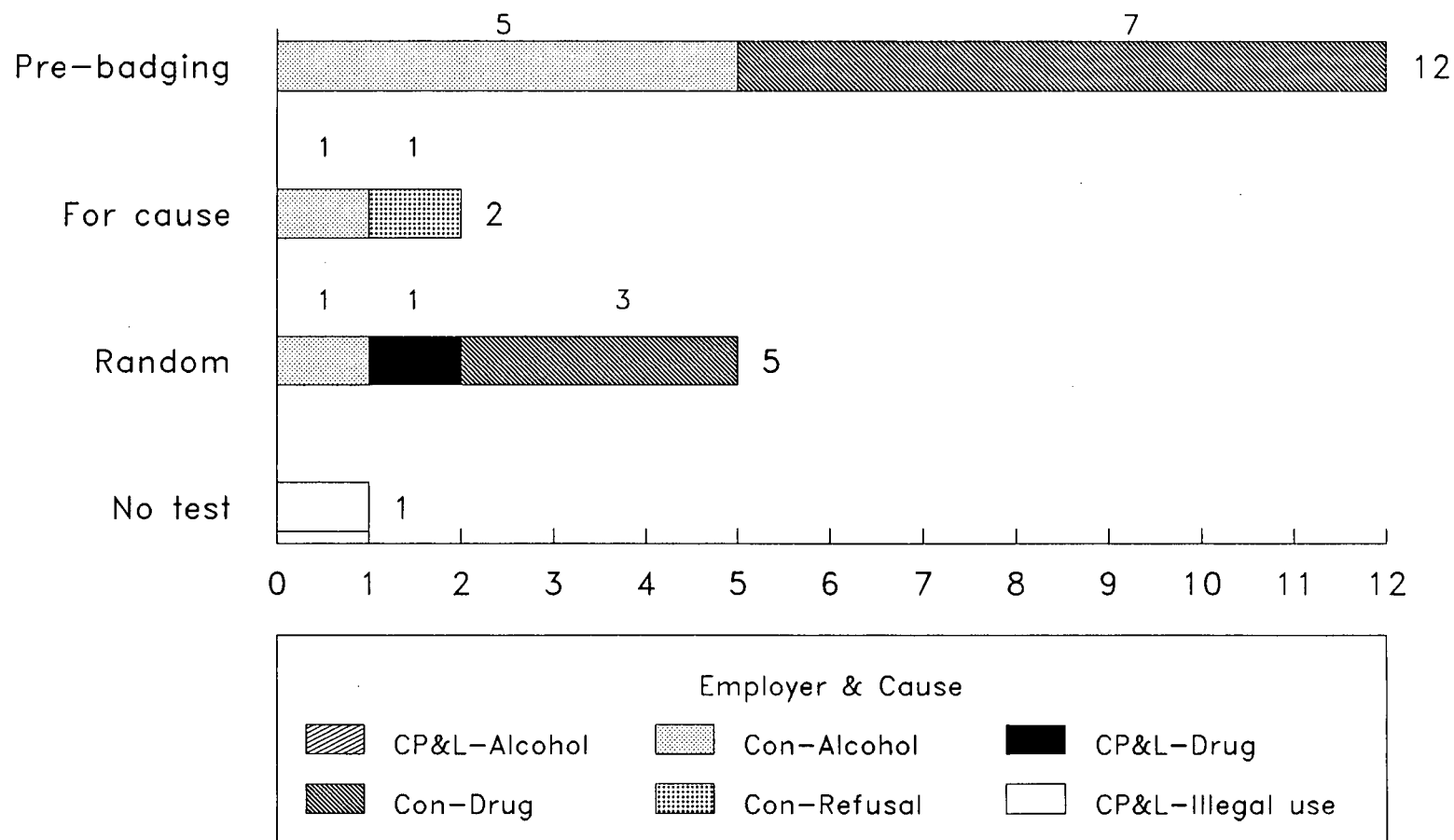
Total number of tests = 3,120

15 violations resulting from testing 0.48%

CP&L Fitness for Duty Program

Violations for Type of Test

By Employer and Cause

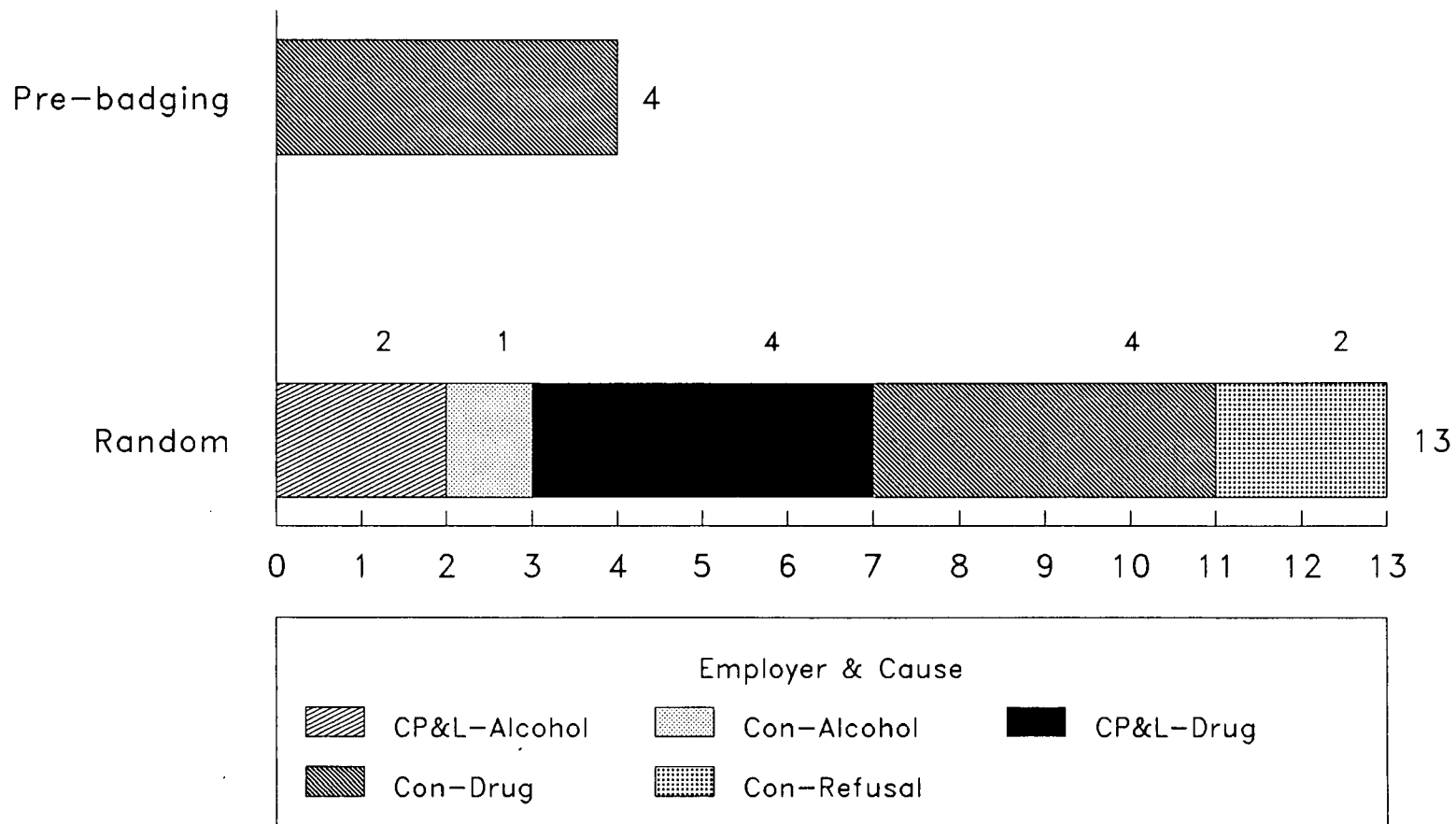


For July 1, 1990 - December 31, 1990
Total number of violations = 20

CP&L Fitness for Duty Program

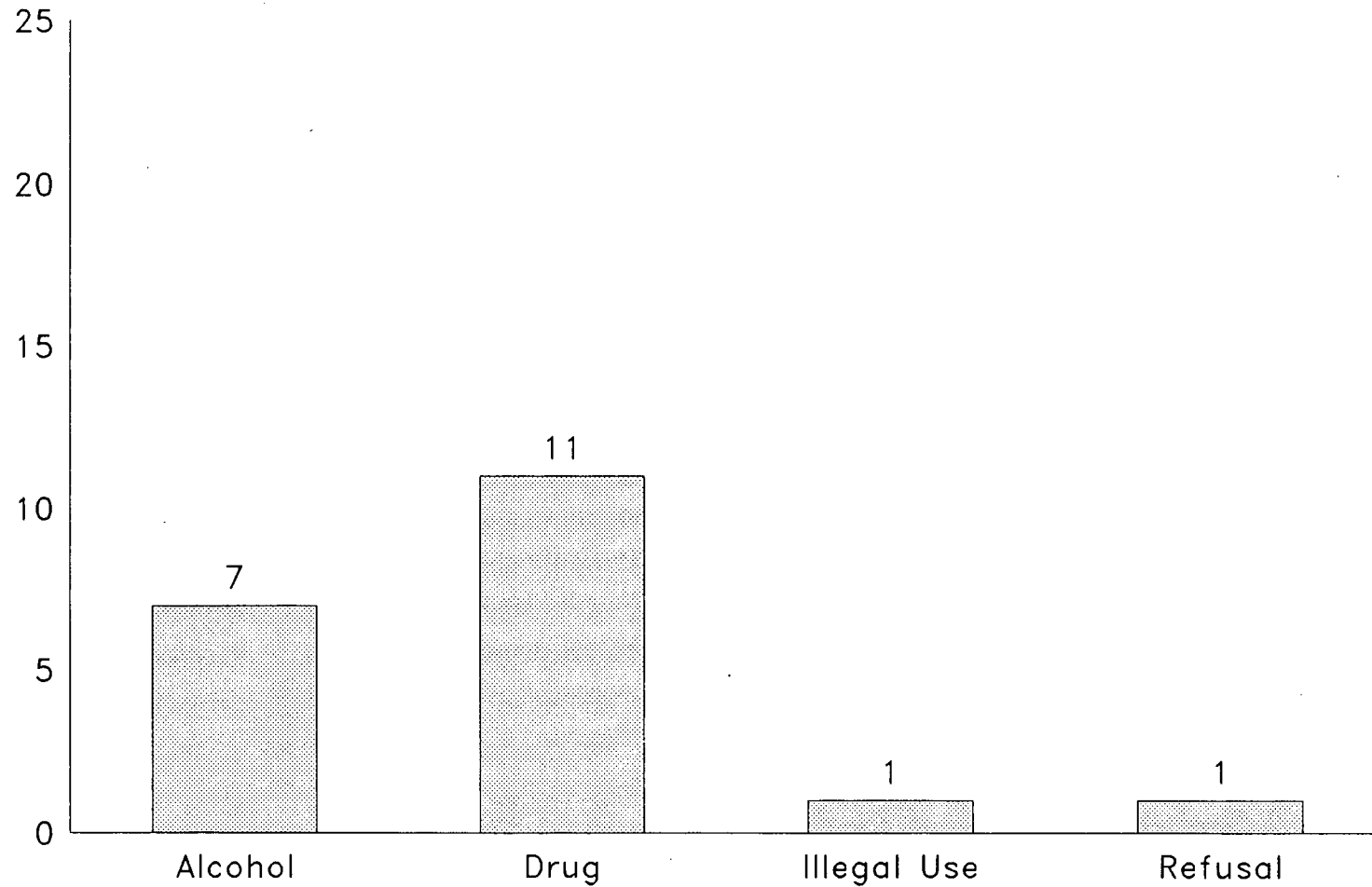
Violations for Type of Test

Employer and Cause



For January 3, 1990 - June 30, 1990
Total number of violations = 17

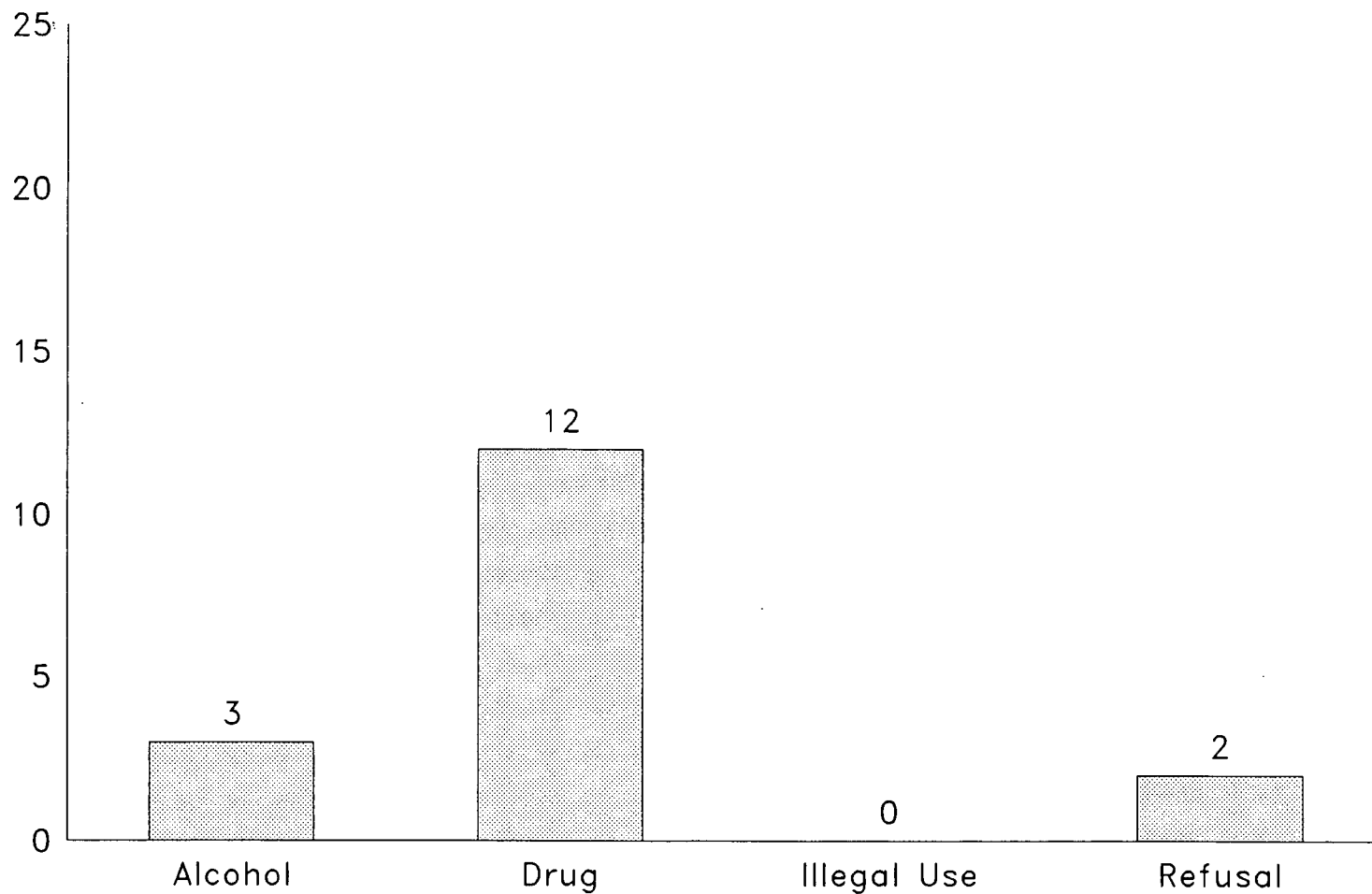
CP&L Fitness for Duty Program Number of Violations by Type



For July 1, 1990 – December 31, 1990
7 alcohol + 11 drug + 1 refusal +
1 illegal use = 20 total violations

CP&L Fitness for Duty Program

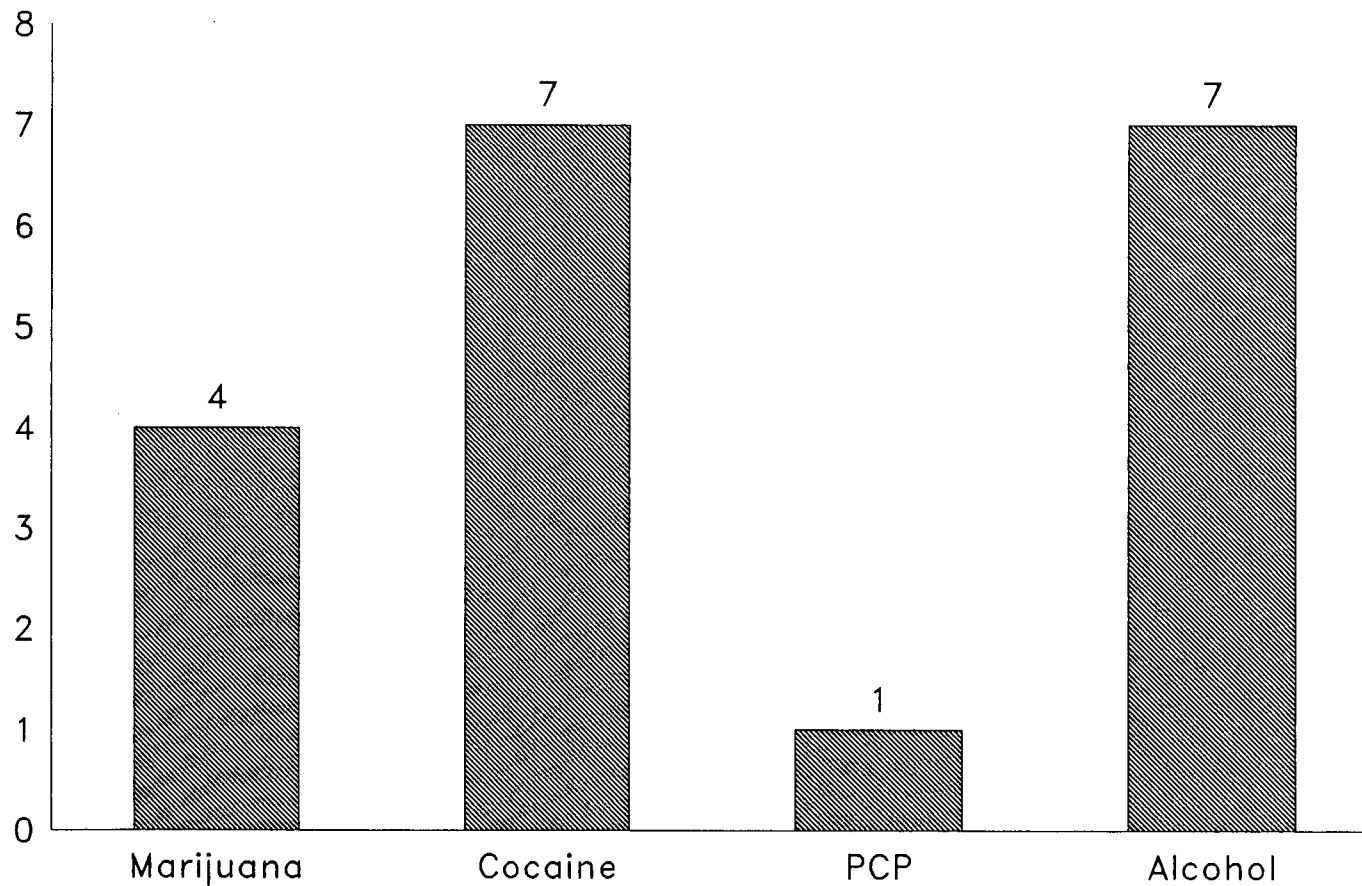
Number of Violations by Type



For January 3, 1990 - June 30, 1990
3 alcohol + 12 drug + 2 refusal =
17 total violations

CP&L Fitness for Duty Program

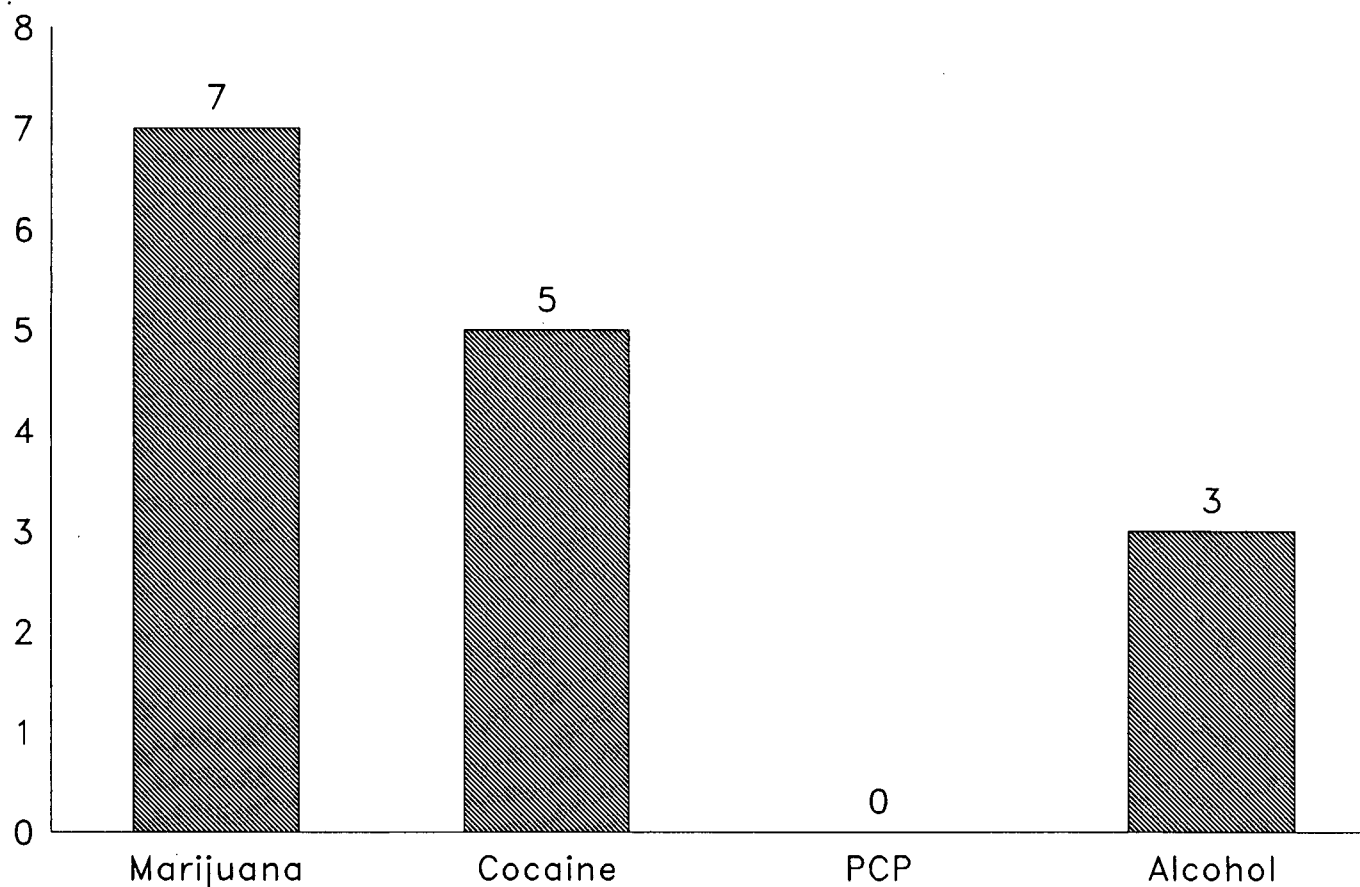
Confirmed Positive Substances



For July 1, 1990 - December 31, 1990
Number of confirmed positive = 18
Number of substances confirmed = 19

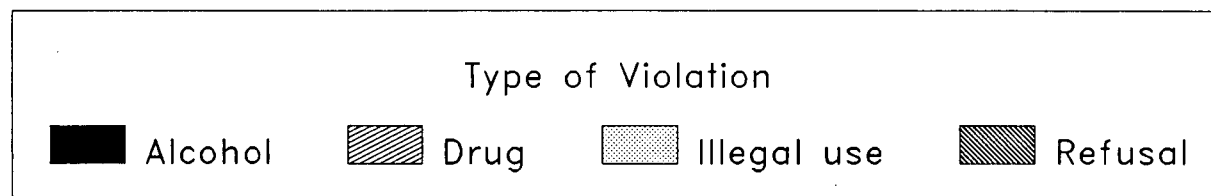
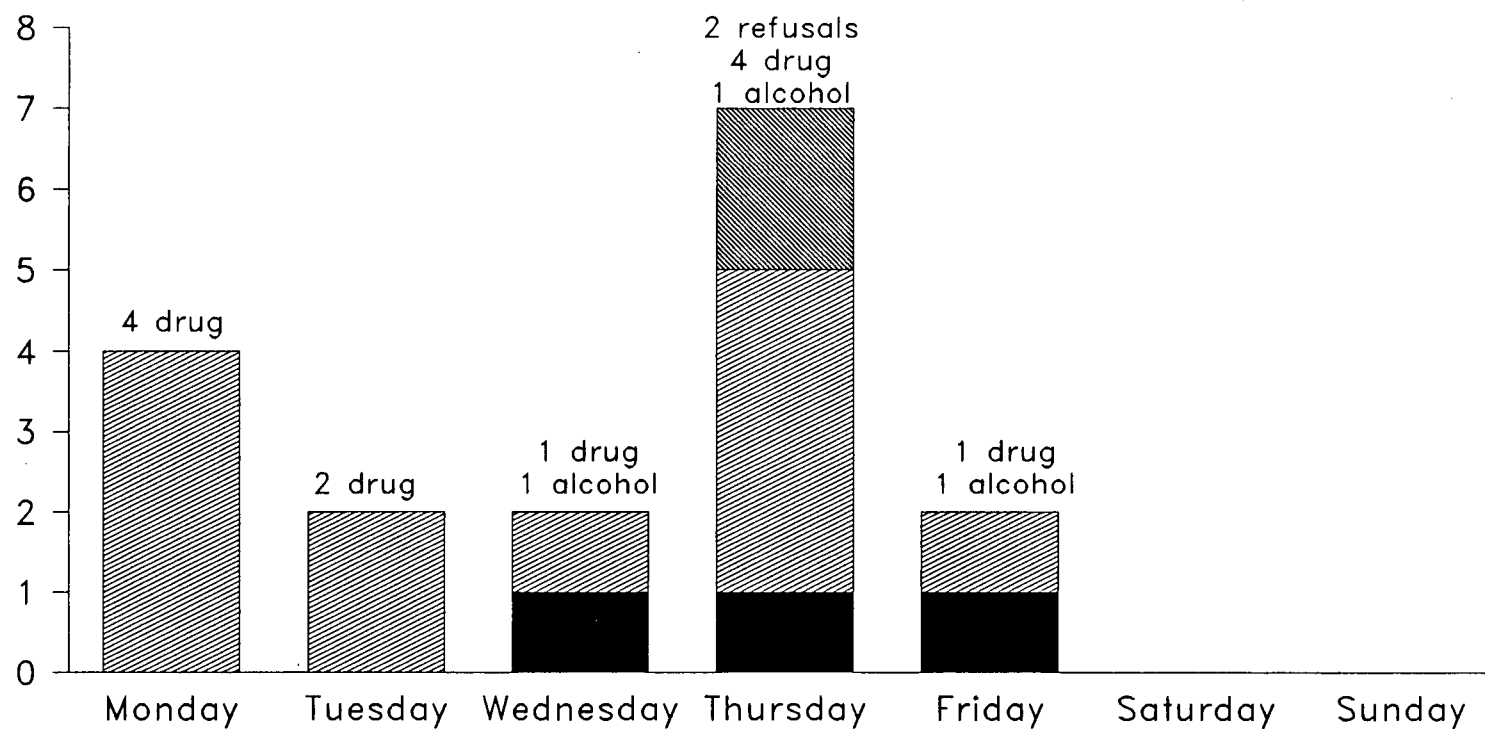
CP&L Fitness for Duty Program

Confirmed Positive Substances



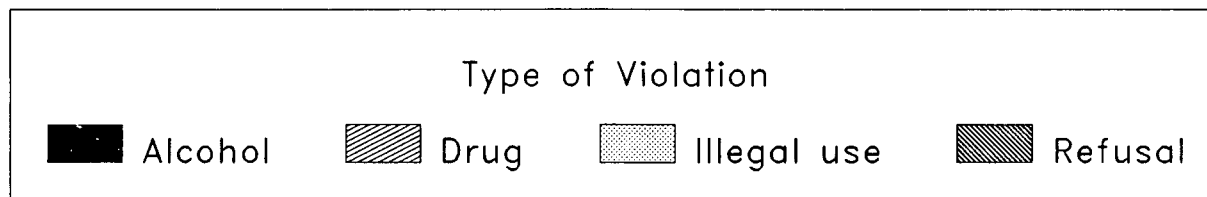
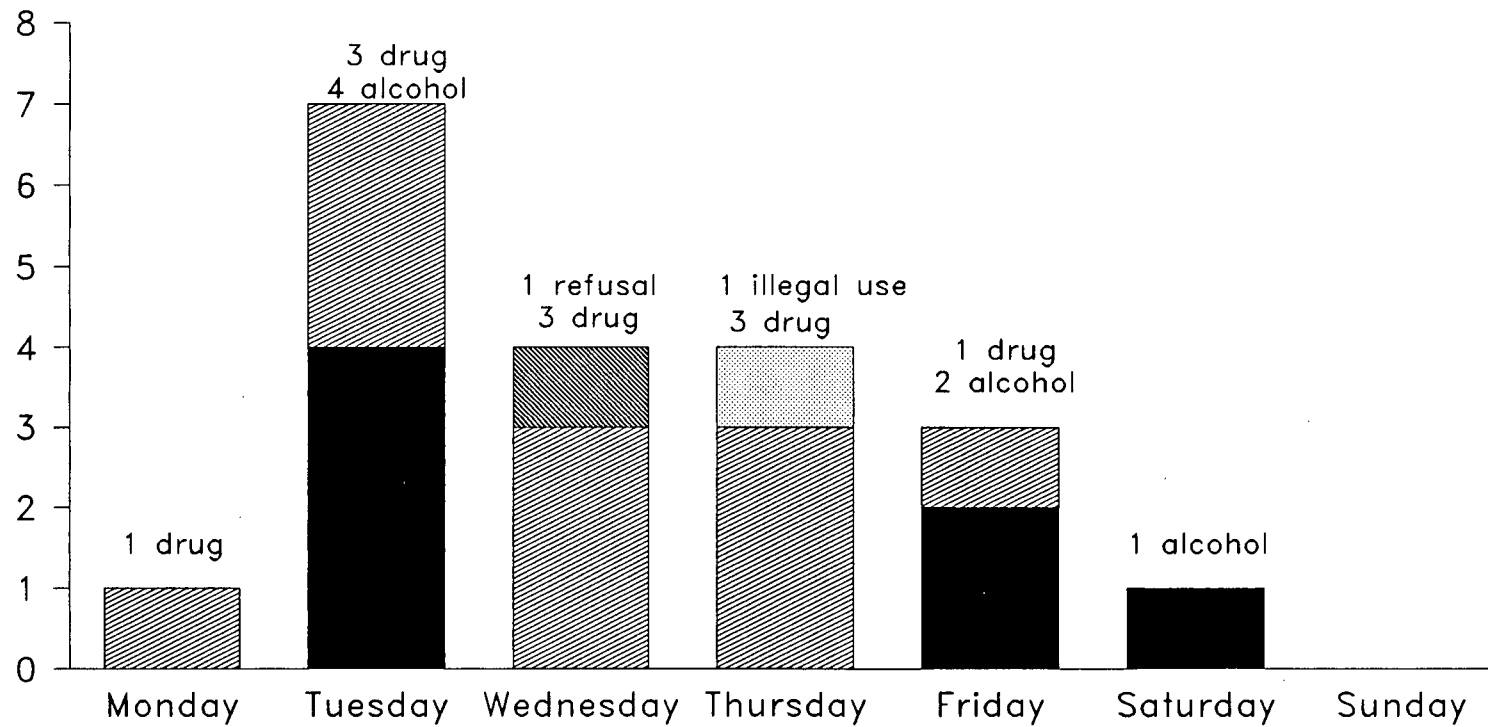
For January 3, 1990 - June 30, 1990
Number of tests confirmed positive = 15
Number of substances confirmed = 15

CP&L Fitness for Duty Program Violations by Weekday



For January 3, 1990 - June 30, 1990
Total violations = 17

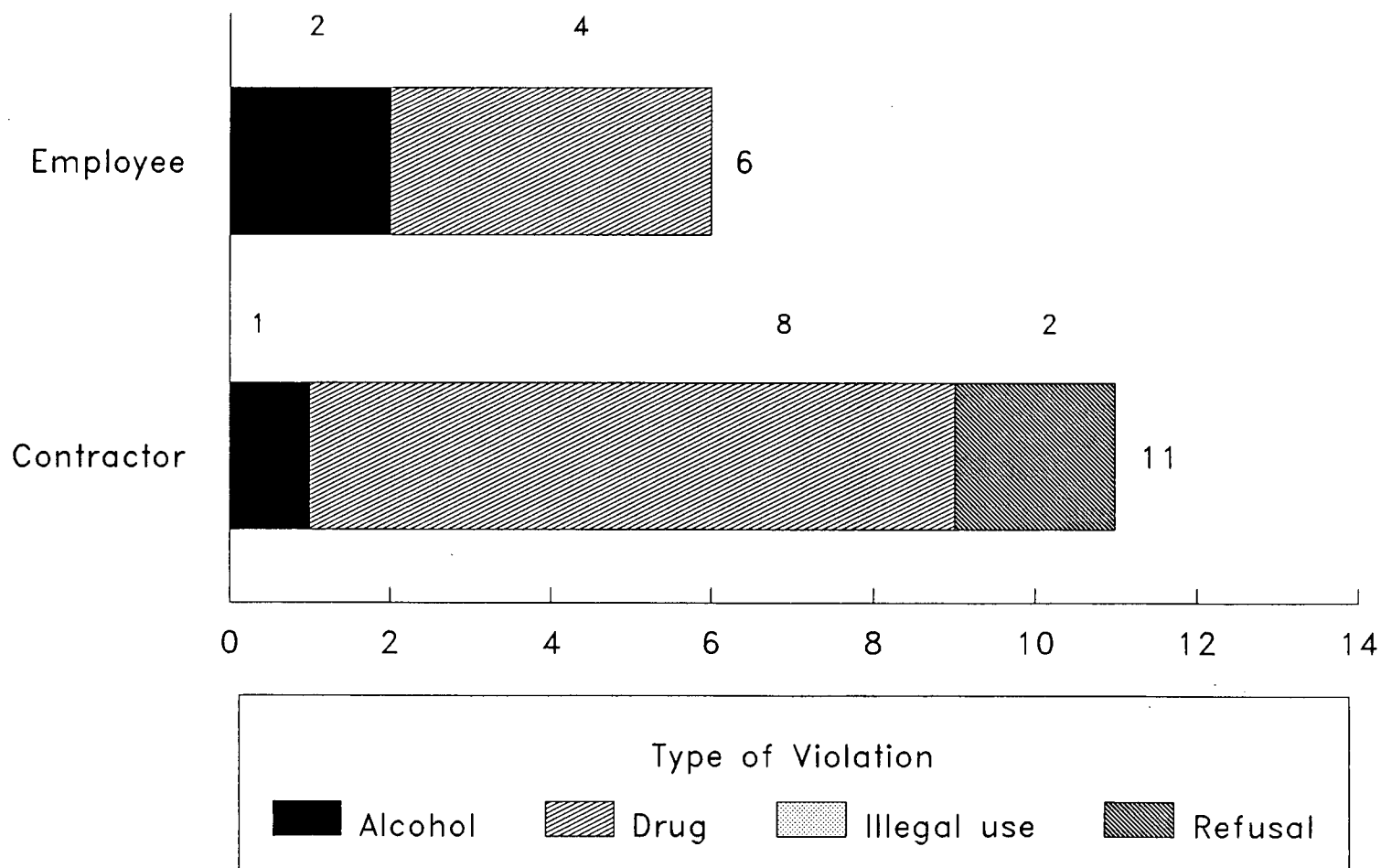
CP&L Fitness for Duty Program Violations by Weekday



For July 1, 1990 - December 31, 1990
Total violations = 20

CP&L Fitness for Duty Program

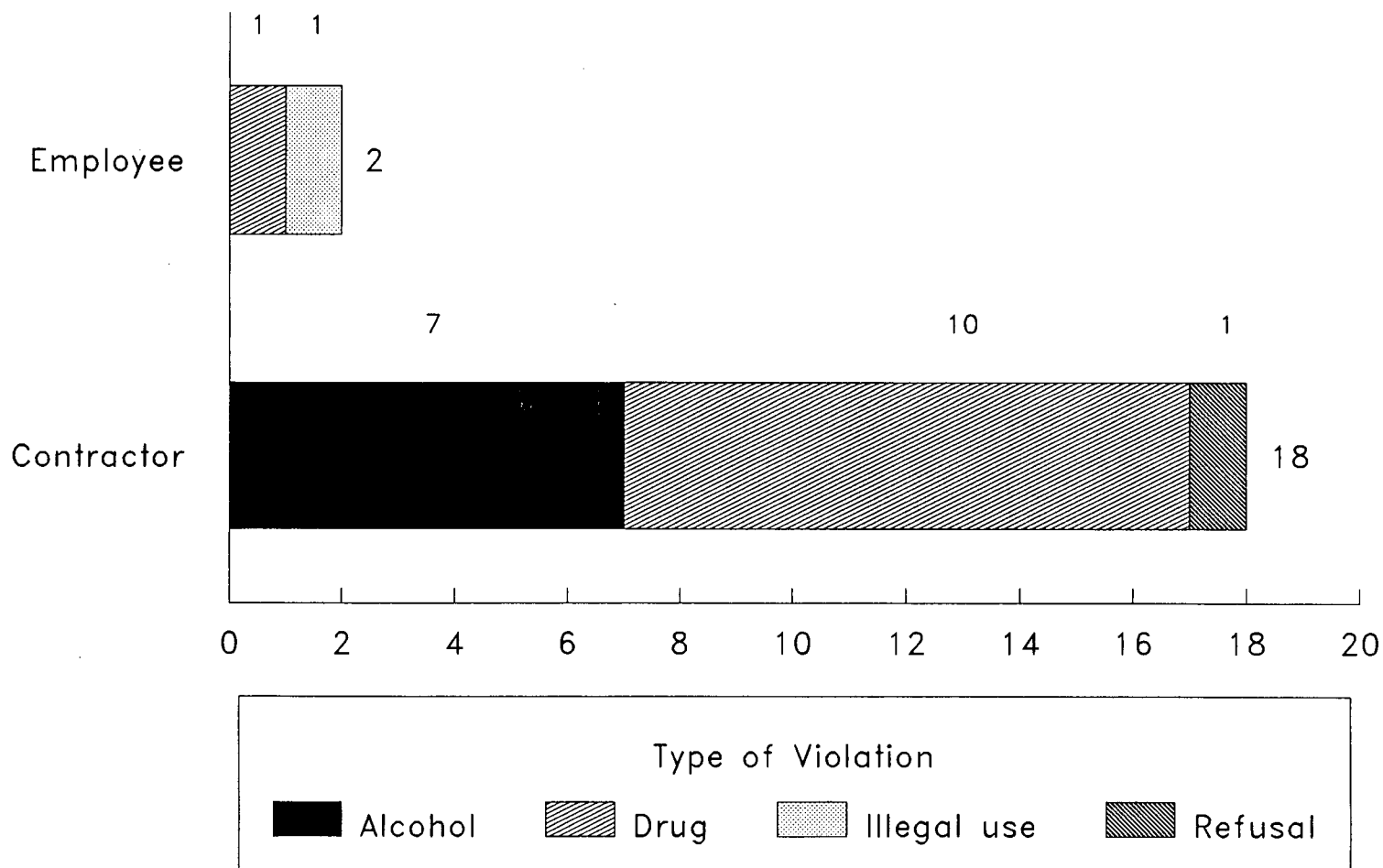
Type of Worker and Type of Violation



For January 3, 1990 - June 30, 1990
 6 employees + 11 contractors = 17

CP&L Fitness for Duty Program

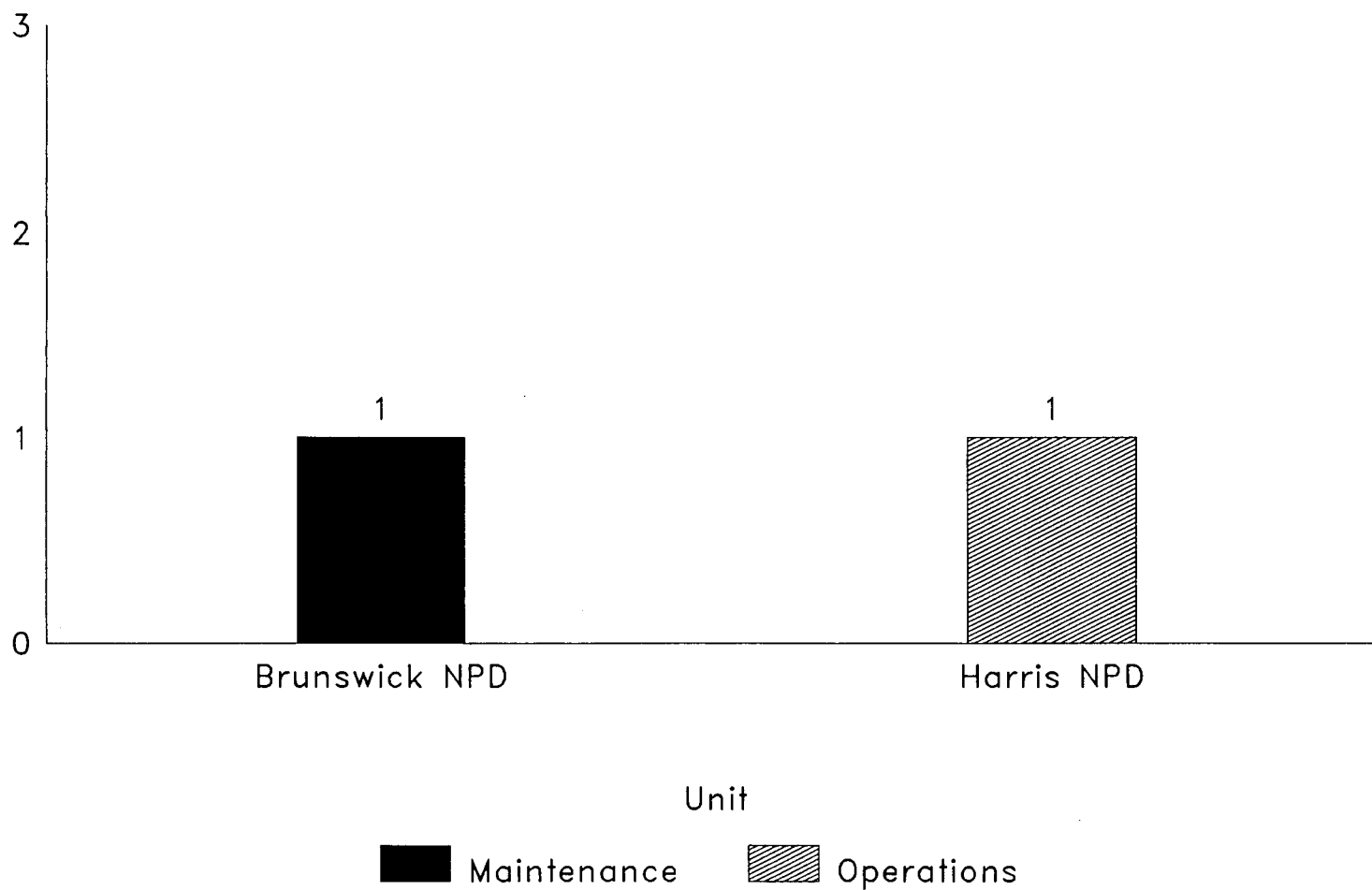
Type of Worker and Type of Violation



For July 1, 1990 – December 31, 1990
 2 employees + 18 contractors = 20

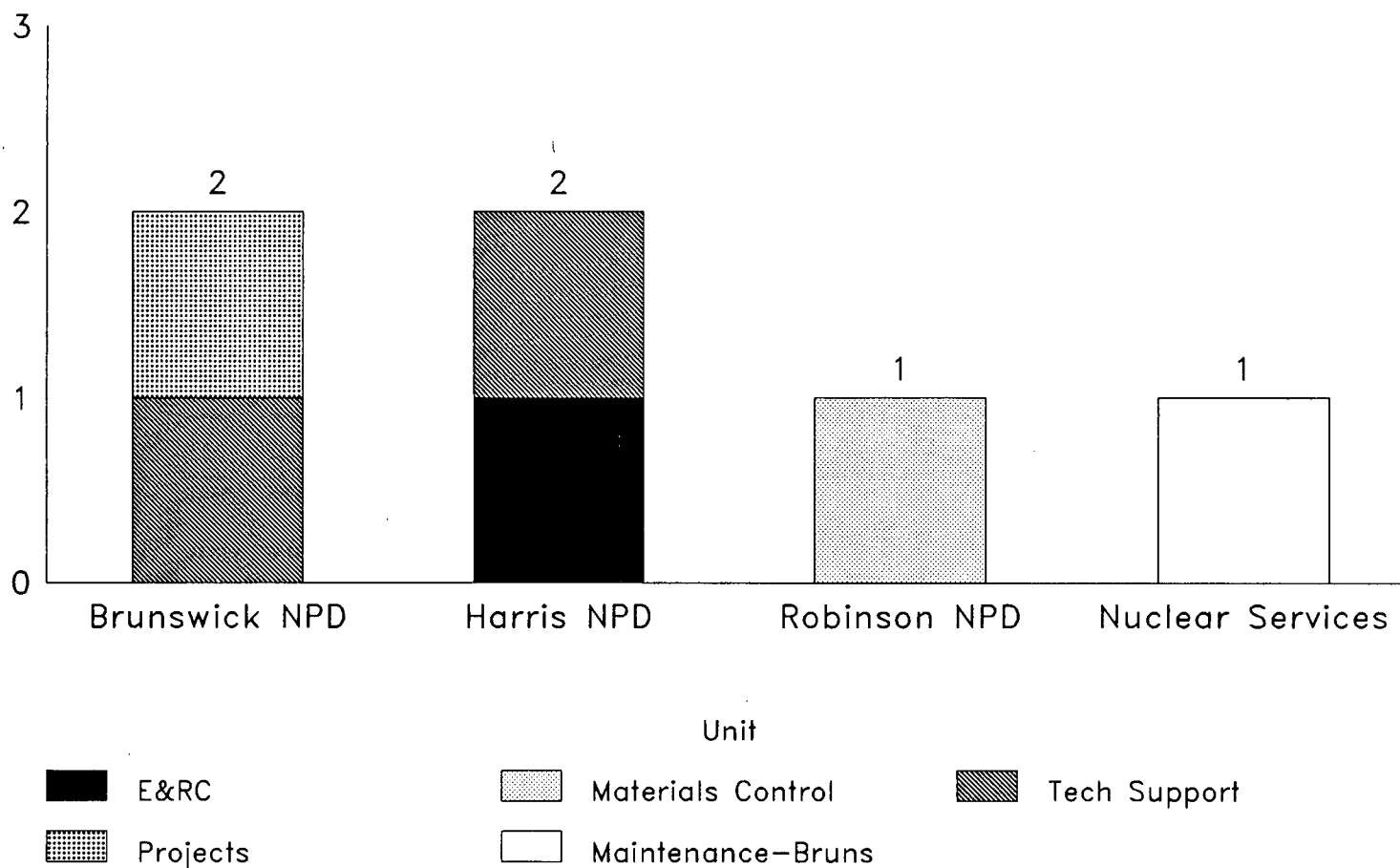
CP&L Fitness for Duty Program

Department & Unit of Employee Violators



For July 1, 1990 – December 31, 1990
Total employee violators = 2

CP&L Fitness for Duty Program Department & Unit of Employee Violators



For January 3, 1990 – June 30, 1990
Total employee violators = 6

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

CAROLINA POWER & LIGHT COMPANY		July 1 - December 31, 1990	
Company		6 Months Ending	
General Office			
Location			
Fred Underwood		919-546-6180	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol (% BAC)	/

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access	463				n/a		0 *	
	#	#	#	#	#	#	#	#
Categories	Tested	Positive	Referred to EAP	Access Restored	Tested	Positive	Tested	Positive
Pre-employment	27	0			n/a	n/a	n/a	n/a
Pre-badging	28	0			n/a	n/a	56	0
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	0	0			n/a	n/a	0	0
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	186	0			n/a	n/a	48	0
Follow-up	0	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	241	0	0	0	n/a	n/a	104	0

* All Gen. Off. contractors are included in the plant averages when they are badged.

Individuals Tested		1989		1990		1991		1992		1993	
# Positive	n/a	n/a	0	0							
# Tested	n/a	n/a	237	234							
% Positive			0%	0%							
Graph of % Positive	5 4 3 2 1										

[illegible]

CAROLINA POWER & LIGHT COMPANY

General Office
Raleigh, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

The following are direct measures and results of the Fitness For Duty Program:

INDICATORS	RESULTS	
	7/1/90 - 12/31/90	1/3/90 - 6/30/90
Number, types and quantity of drugs and alcohol found on premises.	None	None
Total number of confirmed positive drug tests (includes pre-access, random & for cause): a) Employee b) Contractor	a) Employee 0 b) Contractor 0 TOTAL 0	a) Employee 0 b) Contractor 0 TOTAL 0
Total number of confirmed positive alcohol tests (includes pre-access, random & for cause): a) Employee b) Contractor	a) Employee 0 b) Contractor 0 TOTAL 0	a) Employee 0 b) Contractor 0 TOTAL 0
Number of employee EAP self referrals.	a) Employee 5	a) Employee 5
Number of supervisor referrals of employees to EAP.	a) Employee 0	a) Employee 3
Number of for-cause impairment tests: a) Employee b) Contractor	a) Employee 0 b) Contractor 0 TOTAL 0	a) Employee 1 b) Contractor 0 TOTAL 1
Refusal to participate in testing program: a) Employee b) Contractor	a) Employee 0 b) Contractor 0	a) Employee 0 b) Contractor 0
FFD Appeals filed: a) Employee b) Contractor	a) Employee 0 b) Contractor 0	a) Employee 0 b) Contractor 0

CAROLINA POWER & LIGHT COMPANY

General Office
Raleigh, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Lessons Learned or Trends

- 1) Approximately 40% of the average number of employees with unescorted access were randomly tested resulting in no violations. The conclusion is that the program's goal and objectives are being achieved.
- 2) CP&L has one pool from which its workers are selected for random testing. The weekly testing rate is 2% of the Corporate pool and for the year 1990 have randomly tested 5,122 workers while the average number available for testing was 4,665 resulting in an annual testing rate of 109.8%.
- 3) Conclusion of Direct Measures of the FFD Program as illustrated on the previous chart. The program is accepted and supported by employees. The EAP is utilized and recognized as a resource for confidential assistance.
- 4) Availability for random testing for this reporting period was 95.7% and for the year 96.7%.

CAROLINA POWER & LIGHT COMPANY

General Office
Raleigh, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Enhance Program Effectiveness

There were no additional actions taken to enhance the General Office FFD Program effectiveness other than those identified in the Corporate initiatives.

CAROLINA POWER & LIGHT COMPANY

General Office
Raleigh, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Events Reported by Telephone Under 10 CFR 26.73

There were no reportable events to the Commission pursuant to 10 CFR 26.73 during this reporting period.

CAROLINA POWER & LIGHT COMPANY

General Office
Raleigh, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Correct Program Weaknesses

There were no additional actions taken to correct the General Office FFD Program other than those identified in the Corporate initiatives.

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

CAROLINA POWER & LIGHT COMPANY		July 1 - December 31, 1990	
Company		6 Months Ending	
Harris Plant Area, New Hill, NC			
Location			
Steve Allen		919-362-3546	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol (% BAC)	/

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access	776				n/a		462	
	#	#	#	#	#	#	#	#
Categories	Tested	Positive	Referred to EAP	Access Restored	Tested	Positive	Tested	Positive
Pre-employment	58	0			n/a	na/	n/a	n/a
Pre-badging	12	0			n/a	n/a	137	0
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	0	0			n/a	n/a	0	0
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	457	1			n/a	n/a	240	1
Follow-up	0	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	527	1	1	0	n/a	n/a	377	1

Individuals Tested	1989		1990		1991		1992		1993	
# Positive	n/a	n/a	3	2						
# Tested	n/a	n/a	687	697						
% Positive	n/a	n/a	.44	.28						
Graph of % Positive										

[illegible]

CAROLINA POWER & LIGHT COMPANY

Harris Plant
New Hill, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

The following are direct measures and results of the Fitness For Duty Program:

INDICATORS	RESULTS	
	7/1/90 - 12/31/90	1/3/90 - 6/30/90
Number, types and quantity of drugs and alcohol found on premises.	None	None
Total number of confirmed positive drug tests (includes pre-access, random & for cause):	a) Employee 1	a) Employee 2
	b) Contractor 0	b) Contractor 0
a) Employee	TOTAL 1	TOTAL 2
b) Contractor		
Total number of confirmed positive alcohol tests (includes pre-access, random & for cause):	a) Employee 0	a) Employee 0
	b) Contractor 1	b) Contractor 1
a) Employee	TOTAL 1	TOTAL 1
b) Contractor		
Number of employee EAP self referrals.	a) Employee 12	a) Employee 8
Number of supervisor referrals of employees to EAP.	a) Employee 2	a) Employee 0
Number of for-cause impairment tests:	a) Employee 0	a) Employee 0
	b) Contractor 0	b) Contractor 0
a) Employee	TOTAL 0	TOTAL 0
b) Contractor		
Refusal to participate in testing program:	a) Employee 0	a) Employee 0
	b) Contractor 0	b) Contractor 0
a) Employee	TOTAL 0	TOTAL 0
b) Contractor		
FFD Appeals filed:	a) Employee 0	a) Employee 0
	b) Contractor 0	b) Contractor 0
a) Employee		
b) Contractor		

CAROLINA POWER & LIGHT COMPANY

Harris Plant
New Hill, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Lessons Learned or Trends

- 1) Approximately 56.3% of the average number of workers with unescorted access were randomly tested resulting in two violations as follows:

CONTRACTORS

- 1 Positive alcohol test - random

EMPLOYEES

- 1 Positive drug test - random

CONCLUSION

The Company will continue to strive for a drug and alcohol free workplace in the Harris Plant area.

- 2) CP&L has one pool from which its workers are selected for random testing. Corporate-wide for the year 1990, 5,122 workers have been randomly tested while the average number available for testing was 4,665 resulting in an annual testing rate of 109.8%. At the Harris Plant, 697 workers have been randomly tested while 1,238 were available for testing during the reporting period resulting in 53.3% testing of those available. For the year, Harris has randomly tested 1,384 workers while 1,236 have been available for testing resulting in an annual rate of 112.0%

CONCLUSION

The regulatory requirement of randomly testing at least at a 100% rate equal to the workforce has been met Corporate-wide, and although not required, has also been met at the Harris Plant resulting in favorable testing rate among all the Plant locations.

- 3) The Company's policy is to terminate the employee's employment or to permanently deny the contractor access based upon a confirmed illegal drug test. The Company does provide rehabilitation for the first offense by an employee of a confirmed alcohol test and the employee is subject to re-entry drug and alcohol testing as well as unannounced follow-up testing. The Company's policy is to permanently deny the contractor access based upon a confirmed alcohol test. Contractors are not provided Company EAP services.

CONCLUSION

The random positive drug test of the employee resulted in termination, referral to the EAP and permanent denial of access. The Contract worker was permanently denied access.

- 4) Conclusion of Direct Measures of the FFD Program as illustrated on the previous chart.
 - a) The results indicate continued effort is needed to achieve a drug-free workplace; however, reasonable measures for the early detection of persons who are not fit to perform activities within the scope of the regulation are effective.
 - b) The EAP is utilized and perceived as a resource for confidential assistance.
 - c) The program is accepted and supported by all workers.
- 5) Availability for random testing for this reporting period was 91% and for the year 87.4%.

CAROLINA POWER & LIGHT COMPANY

Harris Plant
New Hill, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Enhance Program Effectiveness

There were no additional actions taken to enhance the Harris Plant FFD Program effectiveness other than those identified in the Corporate initiatives.

CAROLINA POWER & LIGHT COMPANY

Harris Plant
New Hill, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Events Reported by Telephone Under 10 CFR 26.73

There were no reportable events to the Commission pursuant to 10 CFR 26.73 during this reporting period.

CAROLINA POWER & LIGHT COMPANY

Harris Plant
New Hill, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Correct Program Weaknesses

There were no additional actions taken to correct Harris Plant FFD Program other than those identified in the Corporate initiatives.

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

CAROLINA POWER & LIGHT COMPANY		July 1 - December 31, 1990	
Company		6 Months Ending	
Brunswick Plant, Southport, NC			
Location			
Vic Grose		919-457-2138	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol (% BAC)	/

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access	1012				n/a		1006	
	#	#	#	#	#	#	#	#
Categories	Tested	Positive	Referred to EAP	Access Restored	Tested	Positive	Tested	Positive
Pre-employment	83	0			n/a	n/a	n/a	n/a
Pre-badging	26	0			n/a	n/a	1323	8
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	4	0			n/a	n/a	10	0
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	608	0			n/a	n/a	512	0
Follow-up	4	0			n/a	n/a	0	0
Other	0	1 *			n/a	n/a	0	0
Total	725	1	0	0	n/a	n/a	1845	8

* non-tested violation -- abuse of illegal drugs

Individuals Tested		1989		1990		1991		1992		1993	
# Positive	n/a	n/a	6	0							
# Tested	n/a	n/a	1008	1120							
% Positive	n/a	n/a	.59%	0%							
Graph of % Positive	5										
	4										
	3										
	2										
	1										

[illegible]

CAROLINA POWER & LIGHT COMPANY

Brunswick Plant
Southport, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

The following are direct measures and results of the Fitness For Duty Program:

INDICATORS	RESULTS	
	7/1/90 - 12/31/90	1/3/90 - 6/30/90
Number, types and quantity of drugs and alcohol found on premises.	None	None
Total number of confirmed positive drug tests (includes pre-access, random & for cause):	a) Employee 0 b) Contractor 4 TOTAL 4	a) Employee 2 b) Contractor 4 TOTAL 6
Total number of confirmed positive alcohol tests (includes pre-access, random & for cause):	a) Employee 0 b) Contractor 4 TOTAL 4	a) Employee 1 b) Contractor 0 TOTAL 1
Total number of illegal use of legal drugs.	a) Employee 1 b) Contractor 0 Total 1	a) Employee 0 b) Contractor 0 Total 0
Number of employee EAP self referrals.	a) Employee 14	a) Employee 13
Number of supervisor referrals of employees to EAP.	a) Employee 0	a) Employee 2
Number of for-cause impairment tests:	a) Employee 0 b) Contractor 0 TOTAL 0	a) Employee 2 b) Contractor 0 TOTAL 2
Refusal to participate in testing program:	a) Employee 0 b) Contractor 0 Total 0	a) Employee 0 b) Contractor 2 Total 2
FFD Appeals filed:	a) Employee 0 b) Contractor 1 Total 1	a) Employee 0 b) Contractor 0 Total 0

CAROLINA POWER & LIGHT COMPANY

Brunswick Plant
Southport, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Lessons Learned or Trends

- 1) Approximately 55.5% of the average number of workers with unescorted access were randomly tested resulting in eight violations as follows:

CONTRACTORS

- 4 Positive drug tests - pre-access
- 4 Positive alcohol tests - pre-access

8 Total

EMPLOYEE

One FFD violation that was not the result of a test ... illegal use of legal drugs.

CONCLUSION

The Company will continue to strive for a drug and alcohol free workplace.

- 2) CP&L has one pool from which it workers are selected for random testing. Corporate-wide for the year 1990, 5,122 workers have been randomly tested while the average number available for testing was 4,665 resulting in an annual testing rate of 109.8%. At the Brunswick Plant, 1,120 workers have been randomly tested while 2,018 were available for testing during the reporting period resulting in 55.5% testing of those available. For the year, Brunswick has randomly tested 2,128 workers while 1,899 have been available for testing resulting in an annual rate of 112.0%

CONCLUSION

The regulatory requirement of randomly testing at least at a 100% rate equal to the workforce has been met Corporate-wide, and although not required, has also been met at the Brunswick Plant resulting in a favorable rate among all the plant locations.

- 3) The Company's policy is to terminate the employee's employment or to permanently deny the contractor access based upon a confirmed illegal drug test. The Company does provide rehabilitation for the first offense by an employee of a confirmed alcohol test and the employee is subject to re-entry drug and alcohol testing as well as unannounced follow-up testing.

The Company's policy is to permanently deny the contractor access based upon a confirmed alcohol test. Contractors are not provided Company EAP services.

CONCLUSION

- a) All eight of the test violations were committed by contractors; therefore, all violators were permanently denied access.
 - b) The employee who committed the violation of illegal use of legal drugs has not as of this date, resumed his normal responsibilities.
 - c) The employee who previously tested positive for alcohol during the period January 3, 1990 - June 30, 1990, has remained fit for duty.
4. Conclusion of Direct Measures of the FFD Program as illustrated on the previous chart.
- a) The results indicate continued effort is needed to achieve a drug-free workplace; however, reasonable measures for the early detection of persons who are not fit to perform activities within the scope of the regulation are effective.
 - b) The EAP is utilized by employees and is recognized as a resource for confidential assistance.
 - c) Workers generally support the program with one contract worker filing an appeal, based upon a positive drug test. The appeal was heard by the Appeals Panel and was subsequently denied -- upholding the positive drug determination by the MRO.
5. Availability for random testing for this reporting period was 90% and for the year 91.1%.

CAROLINA POWER & LIGHT COMPANY

Brunswick Plant
Southport, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Enhance Program Effectiveness

There were no additional actions taken to enhance the Brunswick Plant FFD Program effectiveness other than those identified in the Corporate initiatives.

CAROLINA POWER & LIGHT COMPANY

Brunswick Plant
Southport, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Correct Program Weaknesses

There were no additional actions taken to correct the Brunswick Plant FFD Program other than those identified in the Corporate initiatives.

CAROLINA POWER & LIGHT COMPANY

Brunswick Plant
Southport, North Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Events Reported by Telephone Under 10 CFR 26.73

On November 6, 1990, 1900 EST, a licensed Reactor Operator reported to his Shift Foreman that he had committed a significant Fitness For Duty event by taking approximately 25 tablets of various prescription drugs. He immediately summoned assistance following the ingestion of the prescription drugs. At the time of the occurrence, the employee was off-duty and also was not at the plant site. Site management considered this to have been an isolated occurrence based upon the employee's negative random test result on May 9, 1990, and satisfactory behavior and workplace performance.

The employee was suspended from licensed duties and his security badge placed in "hold" status pending investigation/resolution of the event by CP&L management. He was referred to the Employee Assistance Program.

As of January 30, 1991, the employee had not resumed his normal duties.

This event was reported to the NRC under 10 CFR 26.73 on November 7, 1990, 16:23 EST, and also reported to the NRC in accordance with 10 CFR 55.25.

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

CAROLINA POWER & LIGHT COMPANY		July 1 - December 31, 1990
<small>Company</small>		<small>6 Months Ending</small>
H. B. Robinson, Hartsville, SC		
<small>Location</small>		
Greg Newsome	803-383-1207	
<small>Contact Name</small>		<small>Phone (include area code)</small>
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26		
Marijuana	/	Amphetamines / _____ /
Cocaine	/	Phencyclidine / _____ /
Opiates	/	Alcohol (% BAC) _____ /

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access	532				n/a		823	
	#	#	#	#	#	#	#	#
Categories	Tested	Positive	Referred to EAP	Access Restored	Tested	Positive	Tested	Positive
Pre-employment	31	0			n/a	n/a	n/a	n/a
Pre-badging	12	0			n/a	n/a	1297	4 **
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	0	0			n/a	n/a	4	2 *
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	309	0			n/a	n/a	433	3
Follow-up	3	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	355	0	0	0	n/a	n/a	1734	9

* One was a refusal to complete confirmation alcohol testing.

** See attached.

CAROLINA POWER & LIGHT COMPANY

Robinson Plant
Hartsville, South Carolina

Fitness For Duty Program
Personnel Data
Personnel Subject to 10 CFR 26

** One of these four pre-badging positive tests resulted in the worker being tested for alcohol and did not include a specimen collection for testing. This was an error on behalf of the FFD Administrator's designee and became known too late for immediate corrective action.

CORRECTIVE ACTION

The program staff has been informed by the local Administrator that in all cases, a breath test and specimen collection is to be performed on each worker to be tested. This occurrence is an isolated event.

Random Testing Program Results

Individuals Tested	1989		1990		1991		1992		1993	
# Positive	n/a	n/a	2	3						
# Tested	n/a	n/a	397	742						
% Positive	n/a	n/a	.50	.40						
Graph of % Positive										

Confirmed Positive Tests for Specific Substances

[illegible]

CAROLINA POWER & LIGHT COMPANY

Robinson Plant
Hartsville, South Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

The following are direct measures and results of the Fitness For Duty Program:

INDICATORS	RESULTS	
	7/1/90 - 12/31/90	1/3/90 - 6/30/90
Number, types and quantity of drugs and alcohol found on premises.	None	None
Total number of confirmed positive drug tests (includes pre-access, random & for cause):	a) Employee 0	a) Employee 0
	b) Contractor <u>6</u>	b) Contractor <u>4</u>
a) Employee	TOTAL 6	TOTAL 4
b) Contractor		
Total number of confirmed positive alcohol tests (includes pre-access, random & for cause):	a) Employee 0	a) Employee 1
	b) Contractor <u>2</u>	b) Contractor <u>0</u>
a) Employee	TOTAL 2	TOTAL 1
b) Contractor		
Number of employee EAP self referrals.	a) Employee 10	a) Employee 6
Number of supervisor referrals of employees to EAP.	a) Employee 1	a) Employee 1
Number of for-cause impairment tests:	a) Employee 0	a) Employee 0
	b) Contractor <u>2</u>	b) Contractor <u>0</u>
a) Employee	TOTAL 2	TOTAL 0
b) Contractor		
Refusal to participate in testing program:	a) Employee 0	a) Employee 0
	b) Contractor <u>1</u>	b) Contractor <u>0</u>
a) Employee	TOTAL 1	TOTAL 0
b) Contractor		
FFD Appeals filed:	a) Employee 0	a) Employee 0
	b) Contractor 0	b) Contractor 0
a) Employee		
b) Contractor		

CAROLINA POWER & LIGHT COMPANY

Robinson Plant
Hartsville, South Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Lessons Learned or Trends

- 1) Approximately 54.8% of the average number of workers with unescorted access were randomly tested resulting in nine violations as follows:

CONTRACTORS

- 3 Positive drug tests - pre-access
- 1 Positive alcohol test - pre-access
- 3 Positive drug tests - random
- 2 Positive alcohol tests - for cause*

9 TOTAL

* refused to participate in alcohol confirmation testing

EMPLOYEES

None

CONCLUSION

- a) Program goals and objectives are being met for employees.
 - b) The Company will continue to strive for a drug and alcohol free workplace among its contractors.
- 2) CP&L has one pool from which its workers are selected for random testing. Corporate-wide for the year 1990, 5,122 workers have been randomly tested while the average number available for testing was 4,665 resulting in an annual testing rate of 109.8%. At the Robinson Plant, 742 workers have been randomly tested while 1,355 were available for testing during the reporting period resulting in 54.8% testing of those available. For the year, Robinson has randomly tested 1,139 workers while 1,043 have been available for testing resulting in an annual rate of 109.20%

CONCLUSION

The regulatory requirement of randomly testing of at least at a 100% rate equal to the workforce has been met Corporate-wide, and although not required, has also been met at the Robinson Plant resulting in favorable testing rate among all the Plant locations.

- 3) The Company's policy is to terminate the employee's employment or to permanently deny the contractor access based upon a confirmed illegal drug test. The Company does provide rehabilitation for the first offense by an employee of a confirmed alcohol test and the employee is subject to re-entry drug and alcohol testing as well as unannounced follow-up testing. The Company's policy is to permanently deny the contractor access based upon a confirmed alcohol test. Contractors are not provided Company EAP services.

CONCLUSION

- a) All nine FFD violations were committed by contractors; therefore, all violators were permanently denied access.
- b) The employee who previously tested positive for alcohol during the period January 3, 1990 - June 30, 1990 has remained fit for duty.
- 4) Conclusion of Direct Measures of the FFD Program as illustrated on the previous chart.
 - a) The results indicate continued effort is needed to achieve a drug-free workplace; however, reasonable measures for the early detection of persons who are not fit to perform activities within the scope of the regulation are effective.
 - b) The EAP is utilized and perceived as a resource for confidential assistance.
 - c) The program is accepted and generally supported by all workers.
 - c) Availability for random testing for this reporting period was 88.9% and for the year 94.1%.

CAROLINA POWER & LIGHT COMPANY

Robinson Plant
Hartsville, South Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Enhance Program Effectiveness

There were no additional actions taken to enhance the Robinson Plant FFD Program effectiveness other than those identified in the Corporate initiatives.

CAROLINA POWER & LIGHT COMPANY

Robinson Plant
Hartsville, South Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Events Reported by Telephone Under 10 CFR 26.73

There were no reportable events to the Commission pursuant to 10 CFR 26.73 during this reporting period.

CAROLINA POWER & LIGHT COMPANY

Robinson Plant
Hartsville, South Carolina

Fitness For Duty Program
July 1, 1990 - December 30, 1990

SUMMARY OF MANAGEMENT ACTIONS

Actions Taken to Correct Program Weaknesses

There were no additional actions taken to correct Robinson Plant FFD Program other than those identified in the Corporate initiatives.

CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program

(January 3, 1990 - December 31, 1990)

ATTACHMENT

21-08-53

CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program
January 3, 1990 - December 31, 1990

SUMMARY OF MANGEMENT ACTIONS

Lessons Learned or Trends

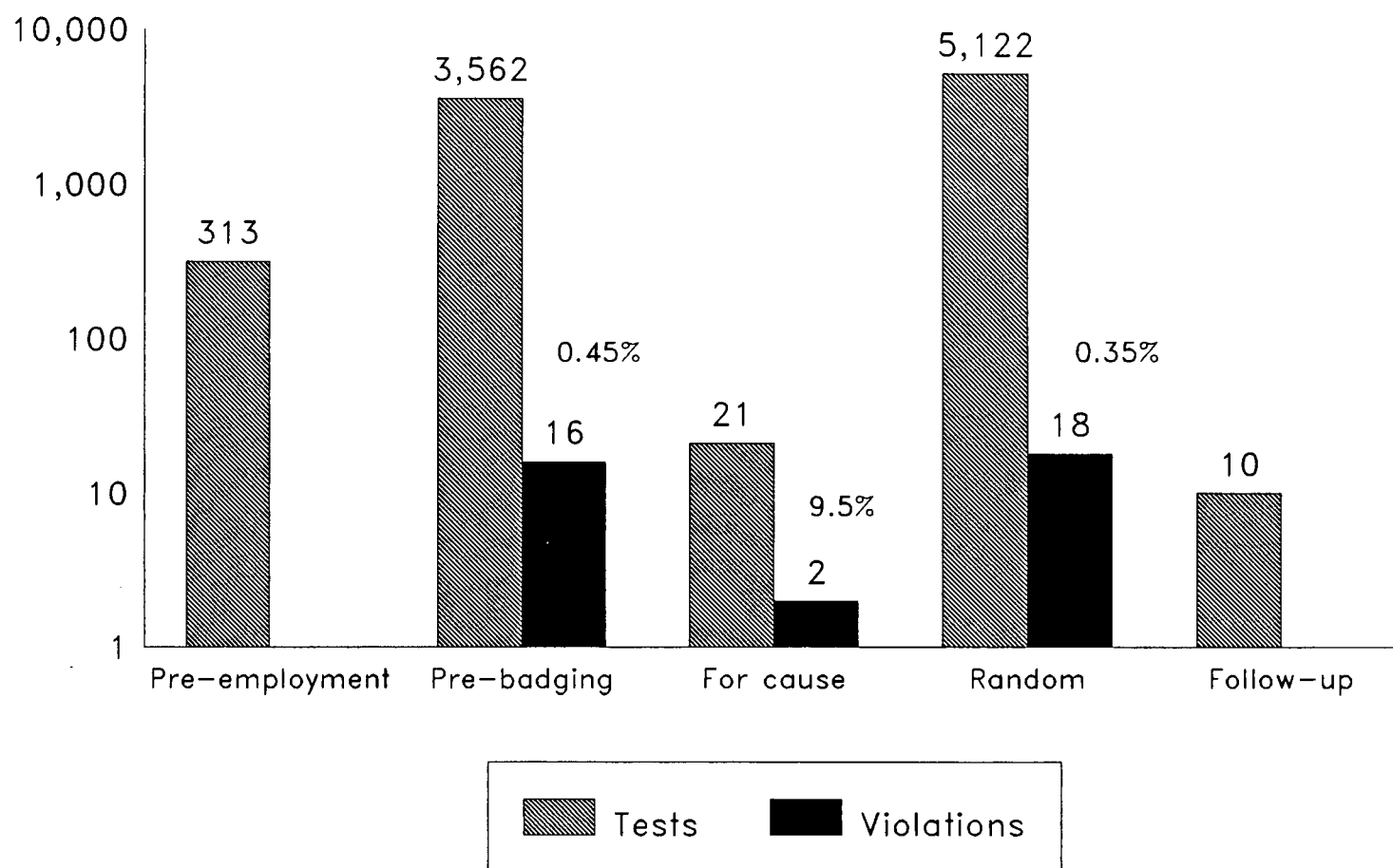
- CHART 1** The percentage of pre-badging violations exceeded the percentage of random violations -- providing early detection of persons who are not fit to perform activities within the scope of the program.
- CHART 2** There were more than three times as many contractor violations than employee violations.
- CHART 3** There were no employee pre-access violations which indicate that screening and interviewing techniques are effective.
- CHART 4** Use of illegal drugs is more predominant than using alcohol with random testing detecting about half of all the violations.
- CHART 5** Cocaine is the choice of drugs, followed by marijuana.
- CHART 6** Testing data is being gathered to assist in evaluating the peaks on Tuesday or Thursday.
- CHART 7** No significant observation.
- CHARTS 8 & 9** The most violations occurred at Brunswick, followed by Harris and Robinson.
- CHART 10** No significant observation.

- CHART 11** Violations increase at outage time (September - November).
- CHART 12** No significant observation.
- CHART 13** No one Unit organization in the Company has more than one violation
-- violations are not concentrated in any particular organization.
- CHART 14** The highest rate of violations occurred at Robinson, followed by
Brunswick and then Harris.
- CHART 15** Robinson had the highest rate of random violations, followed by
Brunswick and Harris.
- CHART 16** Violations occurred by employees who have been with the Company
from 5-14 years and have also been assigned to the nuclear sites
during this time.
- CHART 17** Short-term contractors violate the program more often than long-term
contractors.
- CHART 18** Characteristics of employees most likely to violate the program are --
white male, age 31-35, and work as a technician.
- CHARTS 19 & 20** No significant observation.
- CHART 21** Characteristics of contractors most likely to violate the program are--
white male, age 36-40, and work in the craft area.

- CHARTS 22 & 23** No significant observation.
- CHARTS 24 & 25** Employees are utilizing EAP services by self referral and supervisory referral.
- CHART 26** If the use of the EAP is required for job reinstatement, it will be utilized, otherwise terminated employees do not utilize the referral service offered.
- CHART 27** There were 11 workers who where negative on their first test and subsequently positive on the second test.
- CHART 28** Random testing detected the majority of second test violators, for-cause testing detected two. This reflects favorably on our Behavioral Observation Program.
- CHART 29** Over 1/3 of the workers who were positive on their second test but negative on their first were detected on the second random test. This supports the fact that the random test program is effective.
- CONCLUSION** We are effectively striving towards the goal of achieving a drug-free workplace while providing reasonable assurance that nuclear power personnel perform their tasks in a reliable and trustworthy manner and while trustworthy early detection of persons who are not fit to perform activities within the scope of the program.

CP&L Fitness for Duty Program

Number of Violations from Type of Test
With Percentages



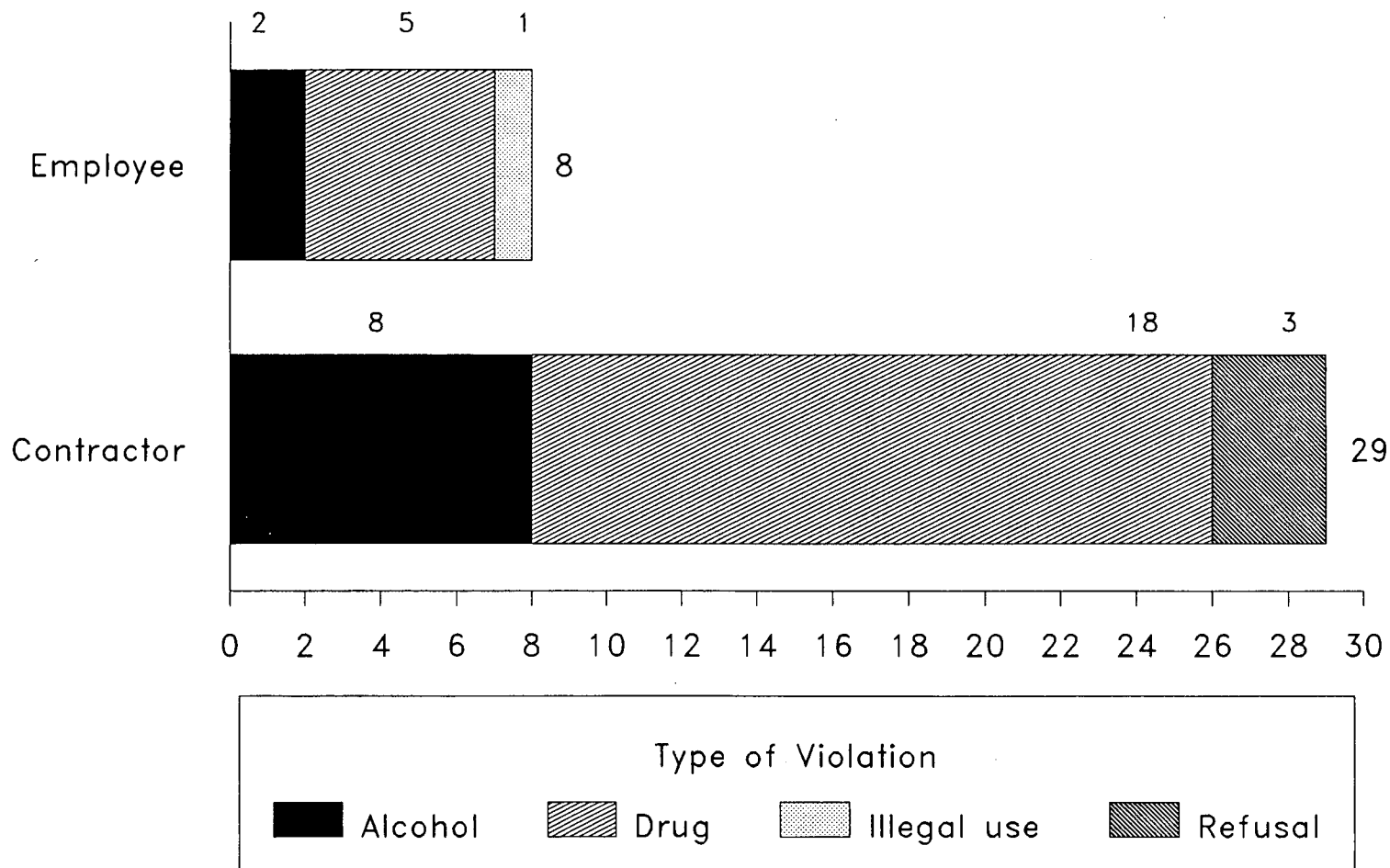
For January 3, 1990 – December 31, 1990

Total number of tests = 9,028

36 violations resulting from testing

CP&L Fitness for Duty Program

Type of Worker and Type of Violation

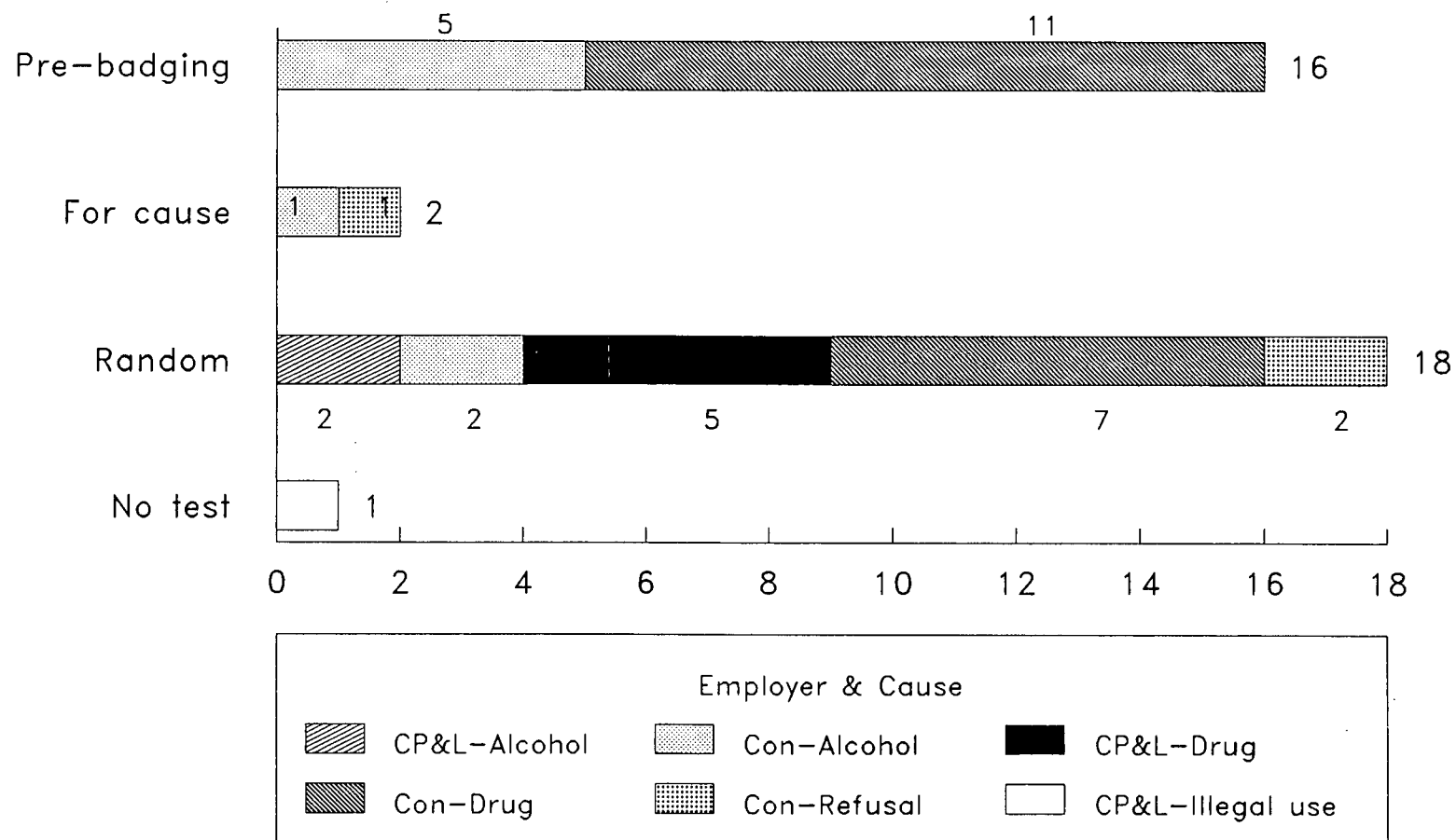


For January 3, 1990 – December 31, 1990
8 employees + 29 contractors = 37

CP&L Fitness for Duty Program

Violations for Type of Test

By Employer and Cause

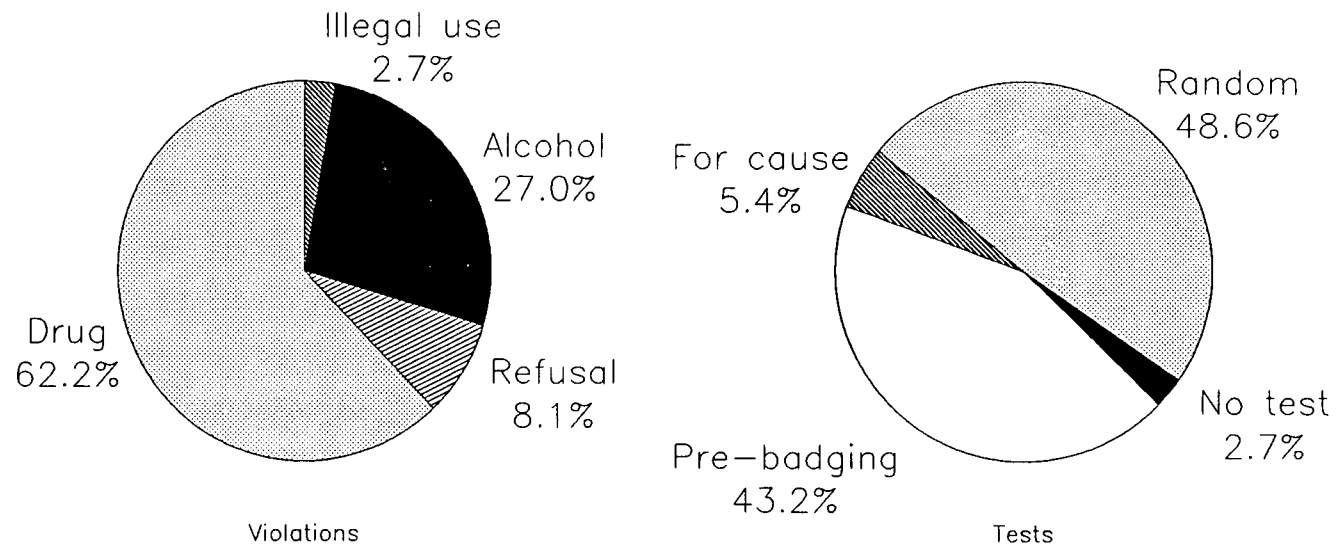


For January 3, 1990 - December 31, 1990
Total number of violations = 37

CHART 4

CP&L Fitness for Duty Program

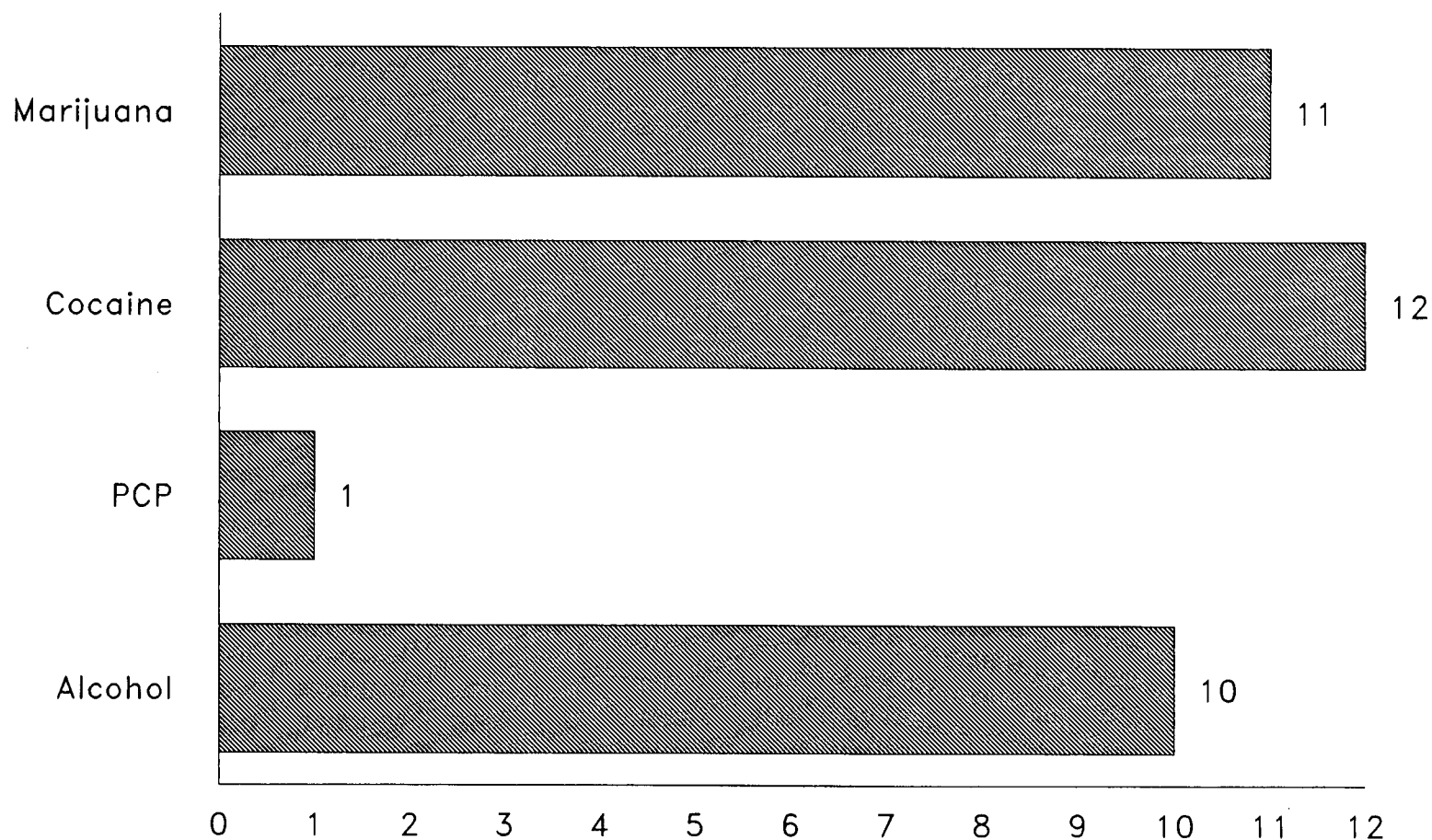
Distributions of Violations and Tests Detecting Violations



For January 3, 1990 - December 31, 1990
23 drug + 10 alcohol + 3 refusal +
1 illegal use = 37 violations

CP&L Fitness for Duty Program

Confirmed Positive Substances



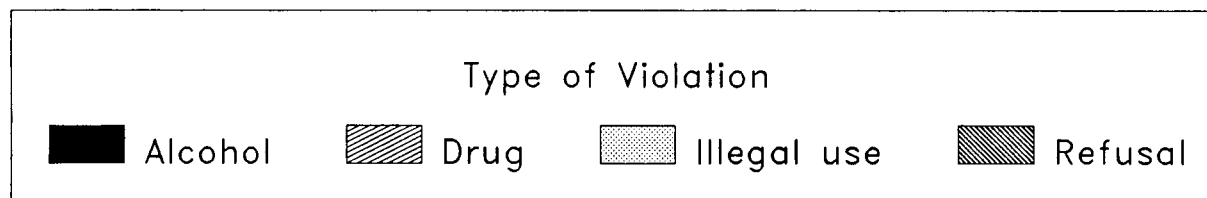
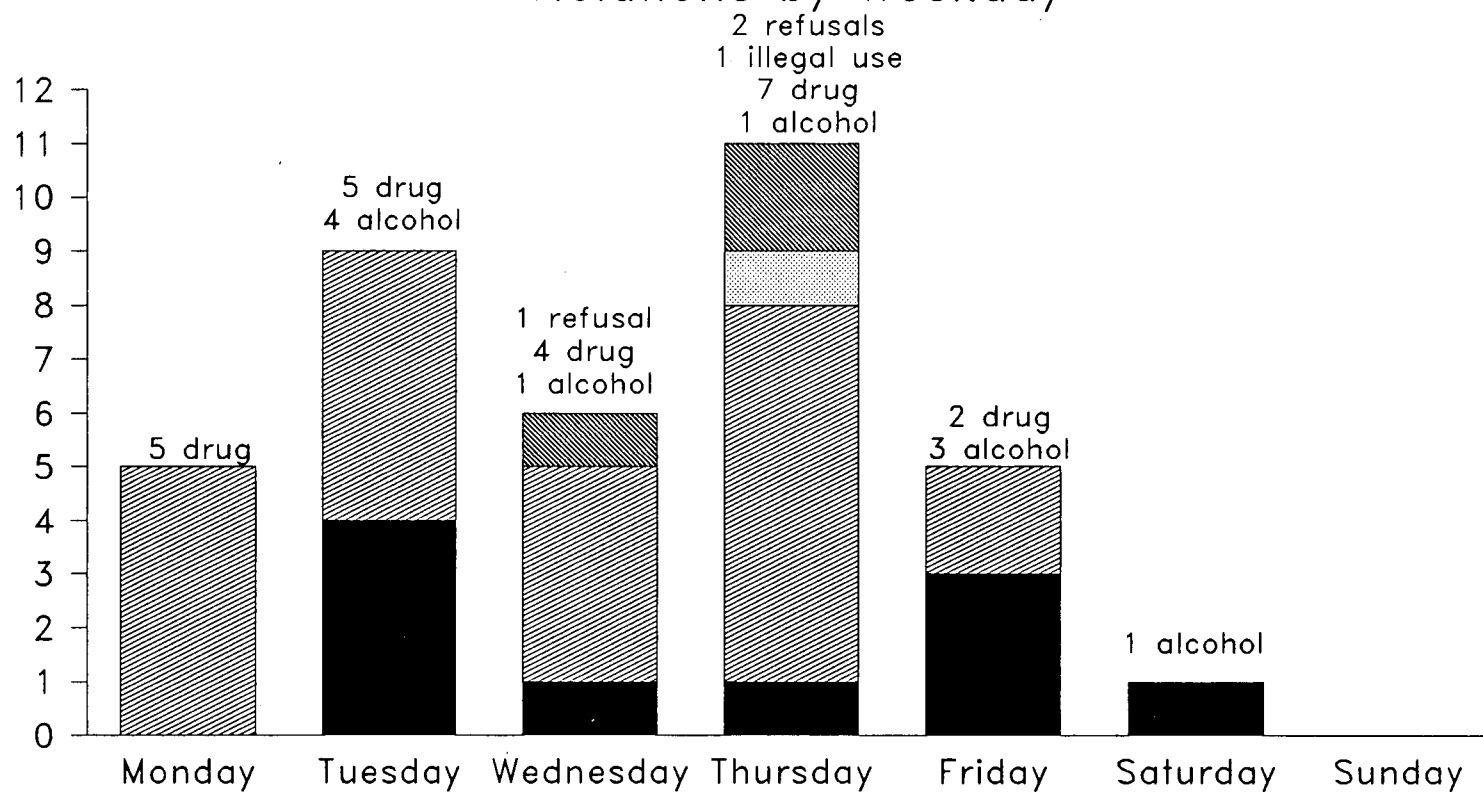
For January 3, 1990 – December 31, 1990

Number of tests confirmed positive = 33

Number of substances confirmed = 34

CP&L Fitness for Duty Program

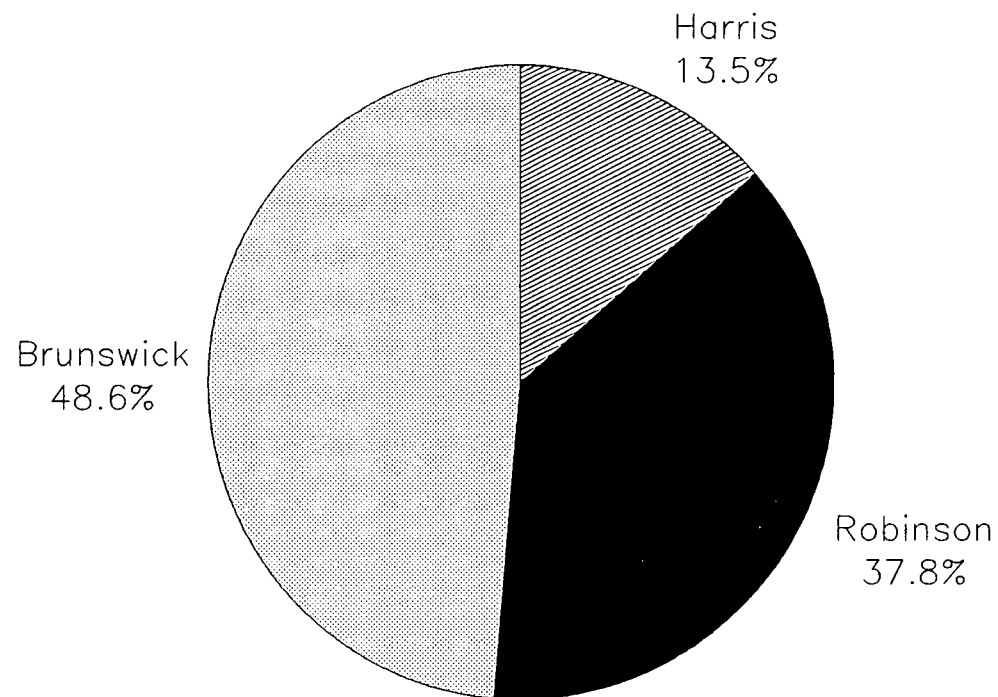
Violations by Weekday



For January 3, 1990 - December 31, 1990
Total violations = 37

CP&L Fitness for Duty Program

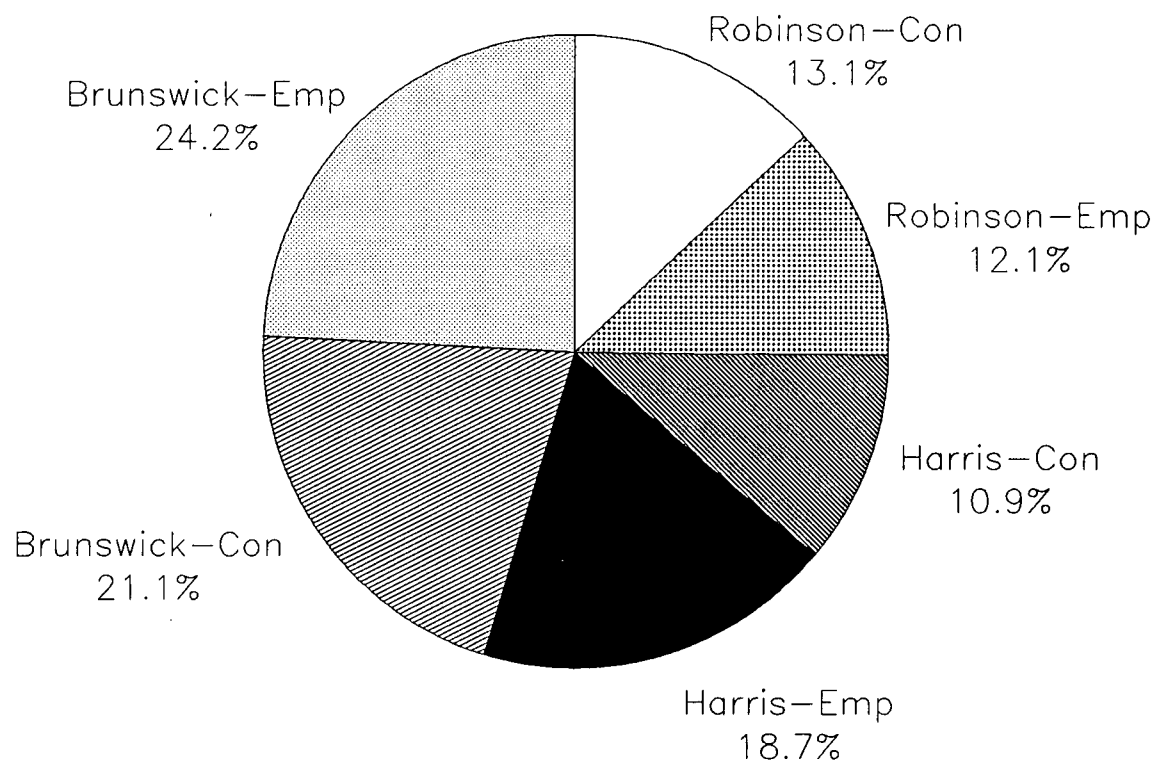
Where the Violators Worked



For January 3, 1990 – December 31, 1990
18 BNP + 5 HNP + 14 RNP =
37 violations

CP&L Fitness for Duty Program

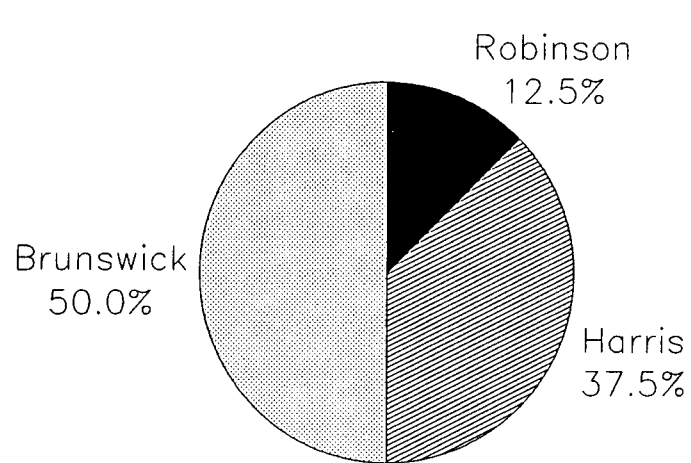
Distribution of Workers (4,173) at
Locations Where FFDP Violations Occurred



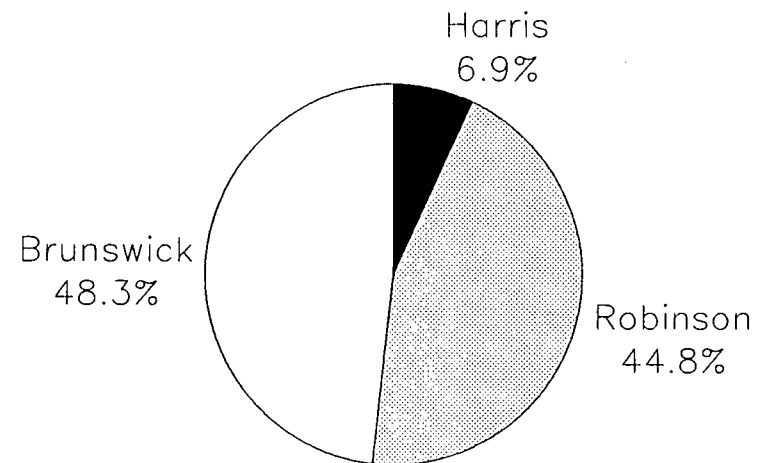
For January 3, 1990 - December 31, 1990
1010 BNP + 779 HNP + 503 RNP = 2292 Emp
880 BNP + 456 HNP + 545 RNP = 1881 Con

CP&L Fitness for Duty Program

Distribution of Employee and Contractor Violators



Where the Employee Violators Worked



Where the Contractor Violators Worked

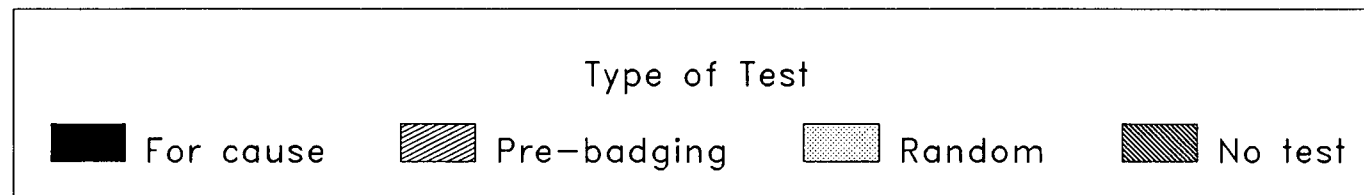
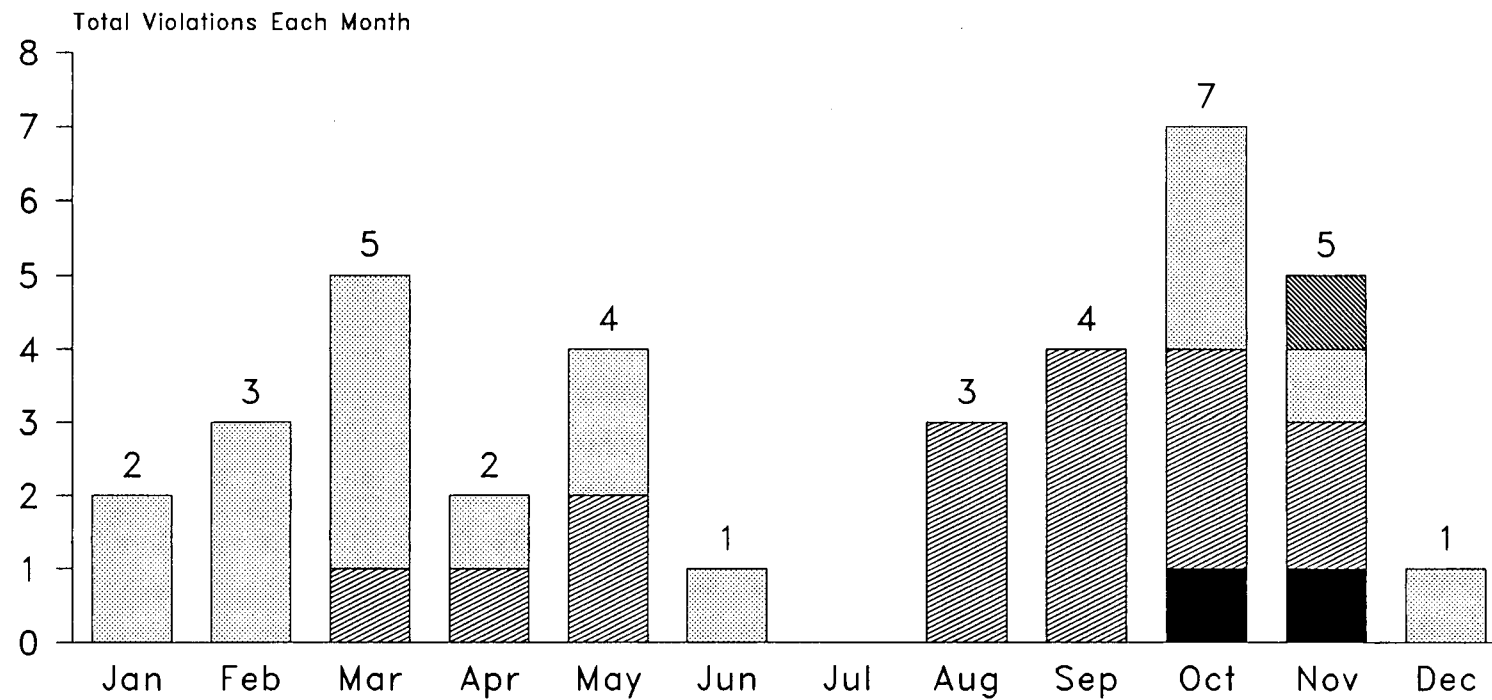
For January 3, 1990 – December 31, 1990

Employees: 4 BNP; 3 HNP; 1 RNP

Contractors: 14 BNP; 2 HNP; 13 RNP

CP&L Fitness for Duty Program

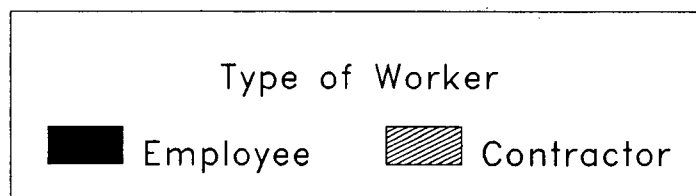
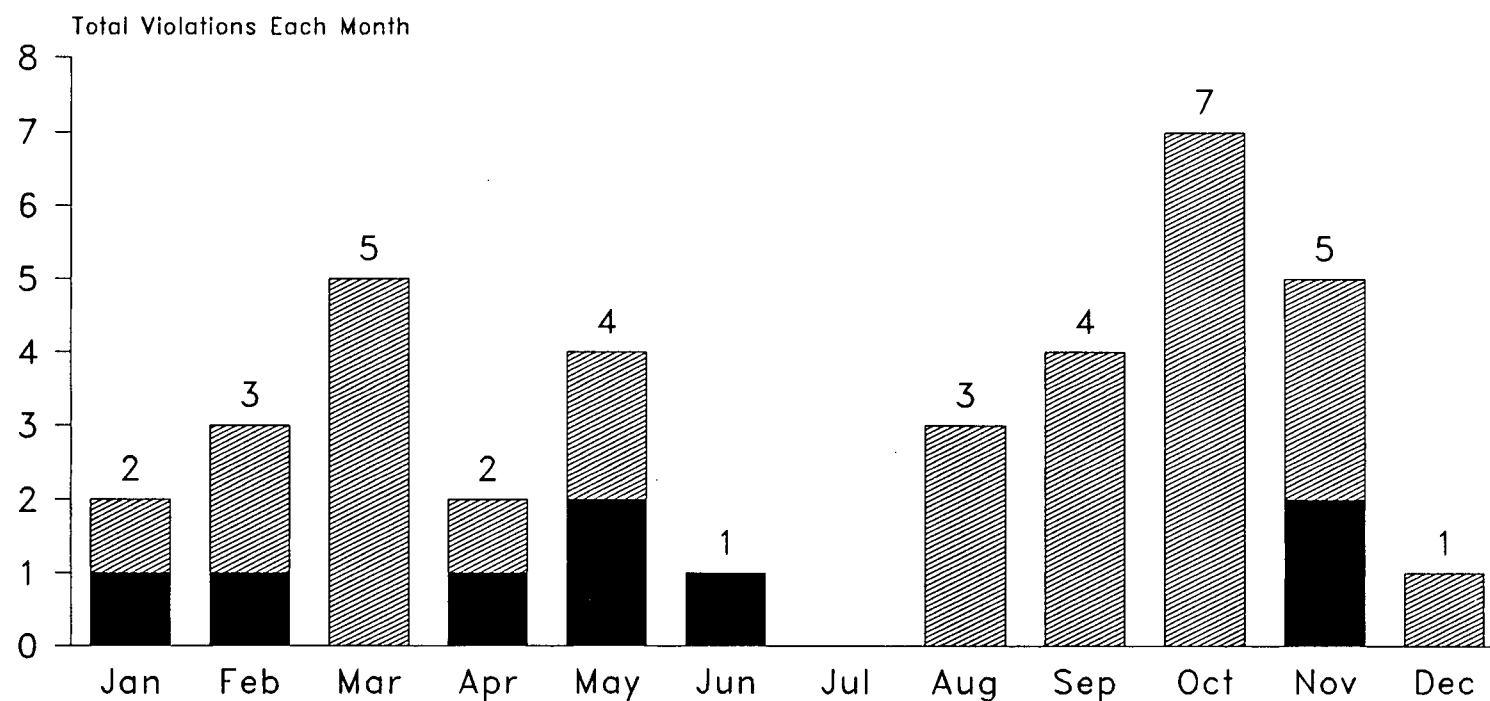
Violations per Month by Test Type



For January 3, 1990 - December 31, 1990
 2 for cause + 16 pre-badging + 18 random
 + 1 no test = 37 violations

CP&L Fitness for Duty Program

Violations per Month by Who Had Them

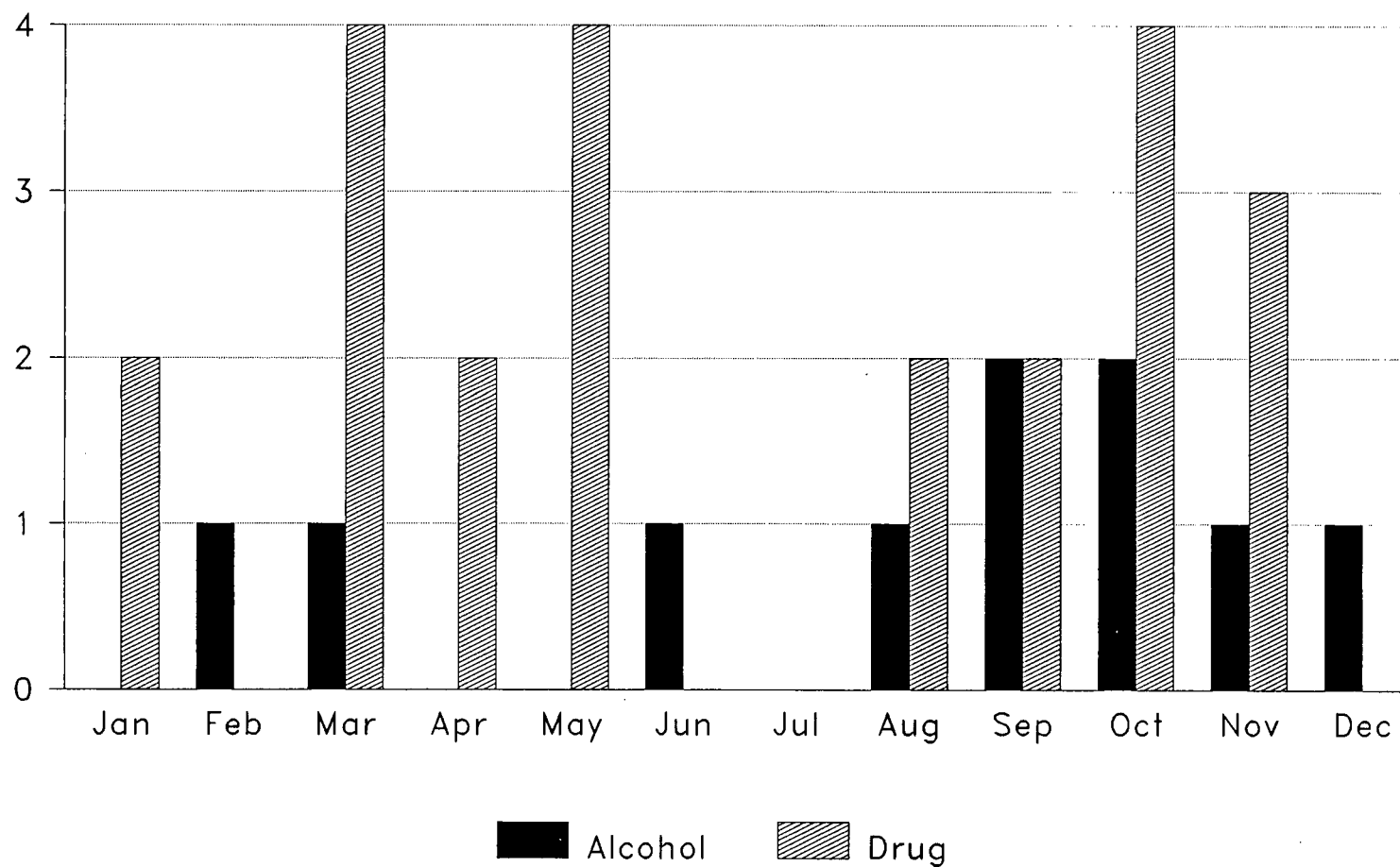


For January 3, 1990 - December 31, 1990
8 employees + 29 contractors =
37 violations

CP&L Fitness for Duty Program

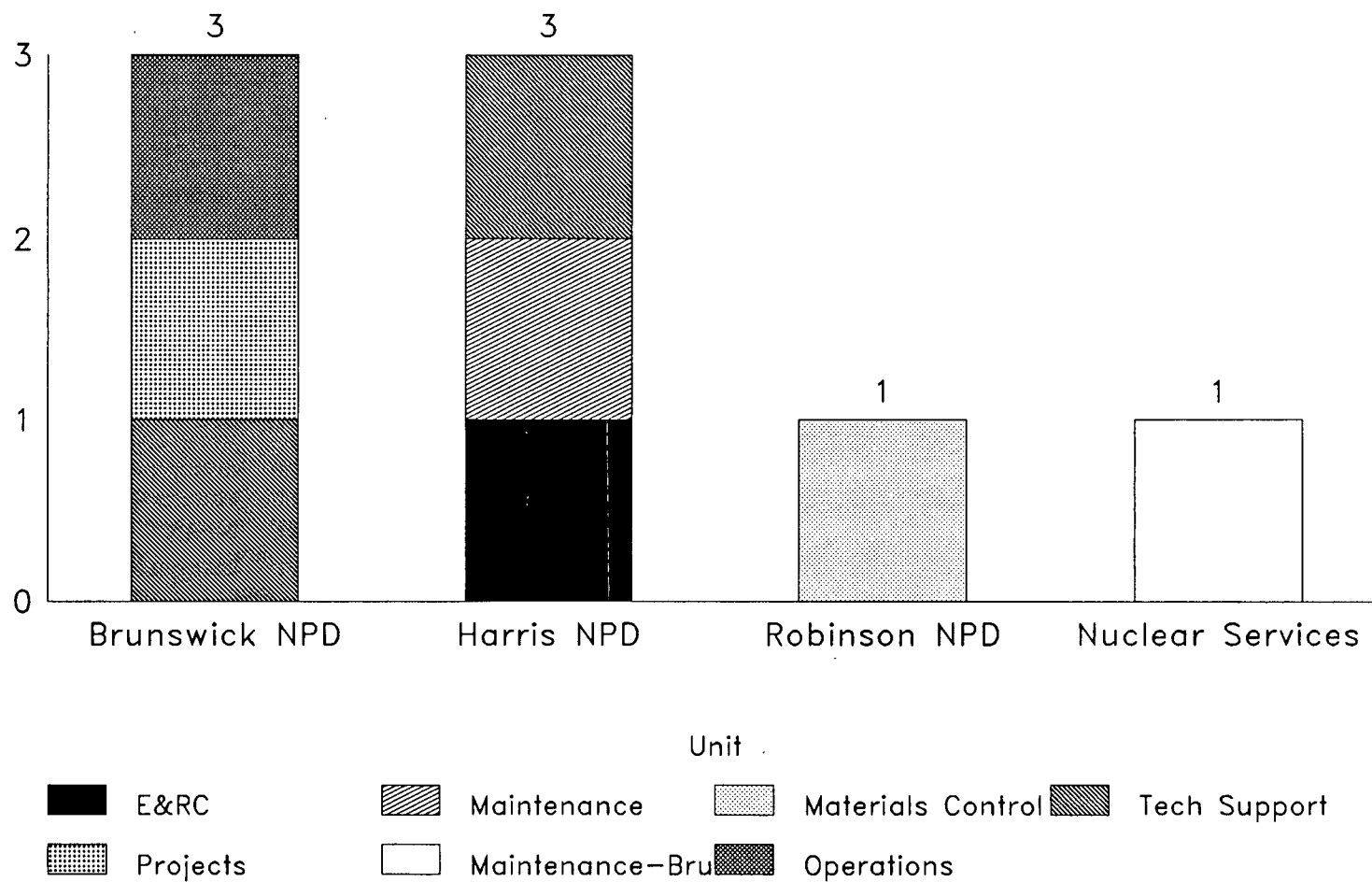
Alcohol Versus Drug Violations

By Month



For January 3, 1990 - December 31, 1990
Annual totals: 10 alcohol; 23 drug

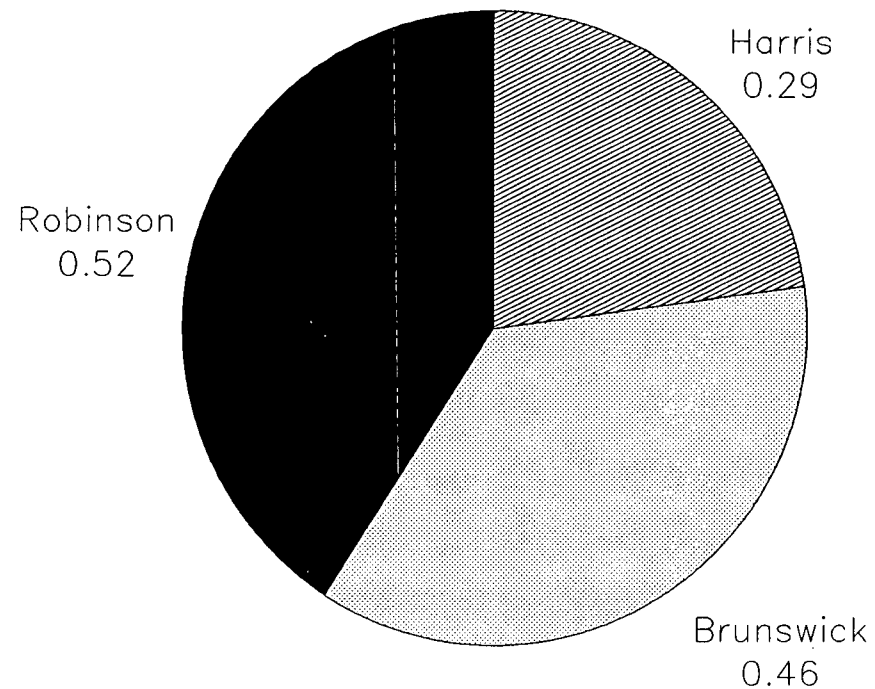
CP&L Fitness for Duty Program Department & Unit of Employee Violators



For January 3, 1990 - December 31, 1990
Total employee violators = 8

CP&L Fitness for Duty Program

Rate of Violations from Testing
At Plants



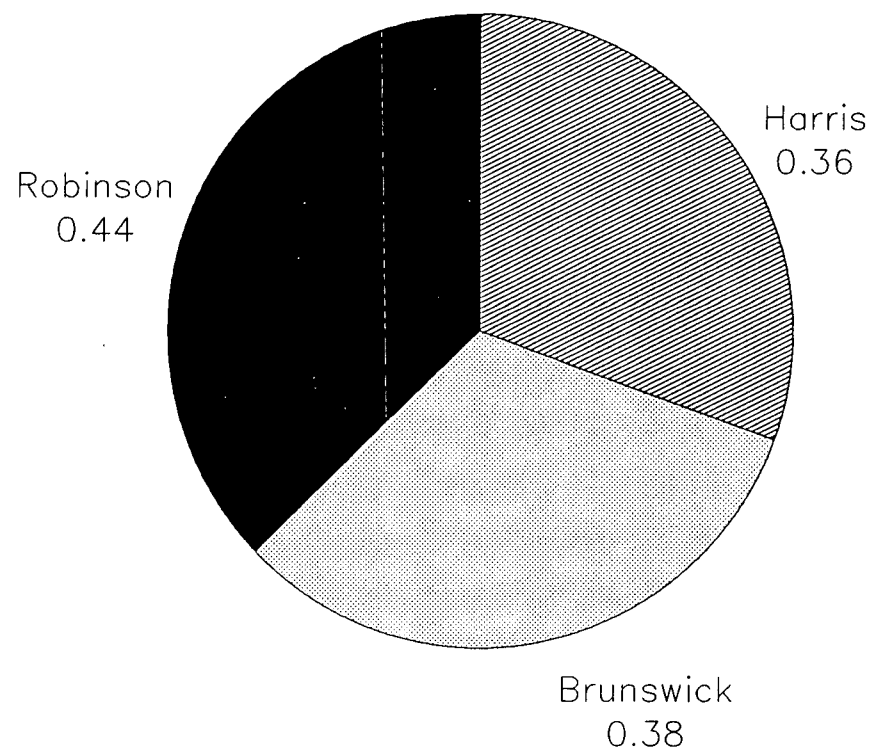
Number violations/number tests x 100

For January 3, 1990 – December 31, 1990
17/3882 BNP; 5/1738 HNP; 14/2701 RNP
Includes all types of tests

Illegal use violation at BNP not included

CP&L Fitness for Duty Program

Rate of Violations from
Random Testing at Plants



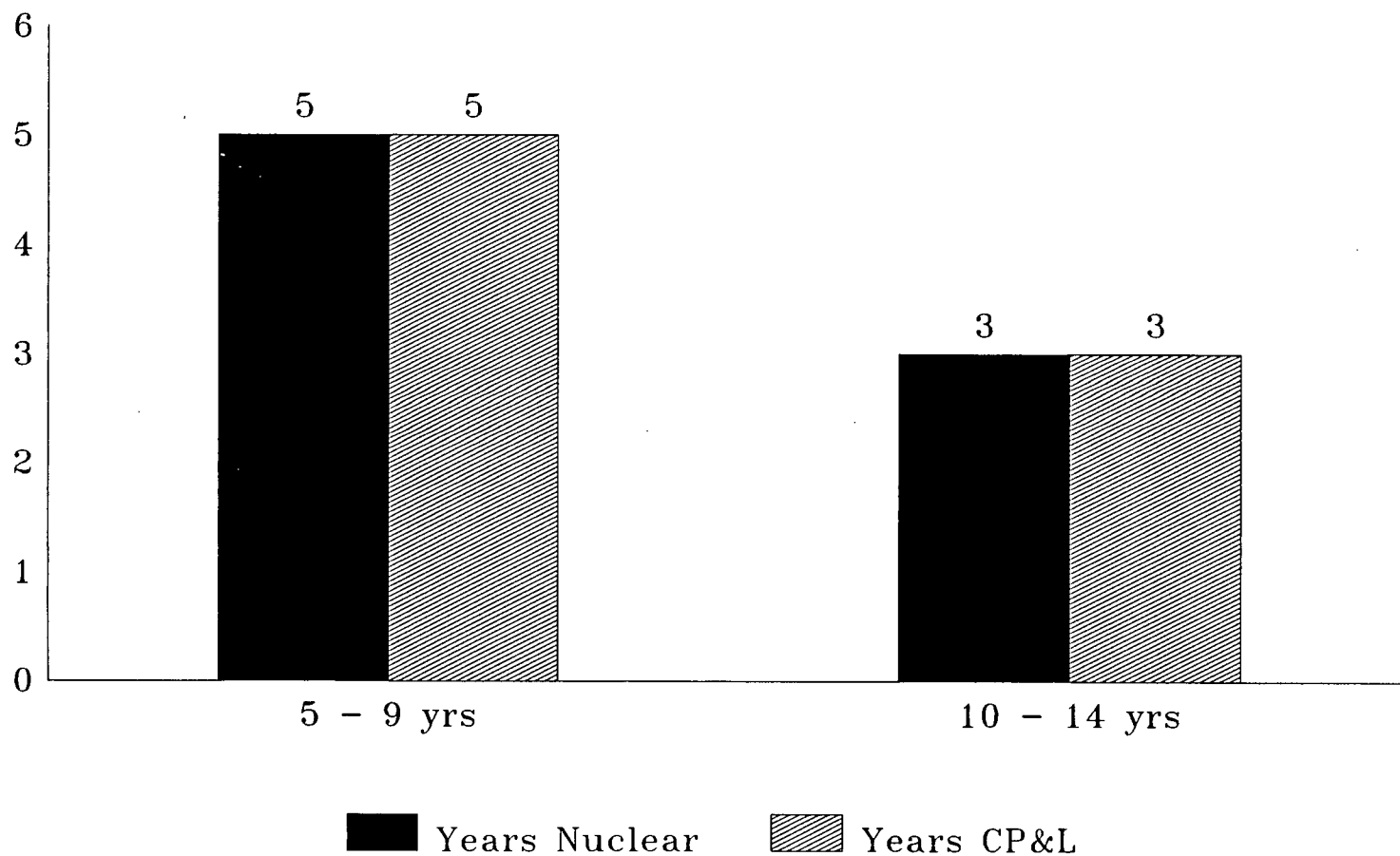
Number violations/number tests x 100

For January 3, 1990 – December 31, 1990

8/3882 BNP; 5/1738 HNP; 5/2701 RNP

Includes only random testing

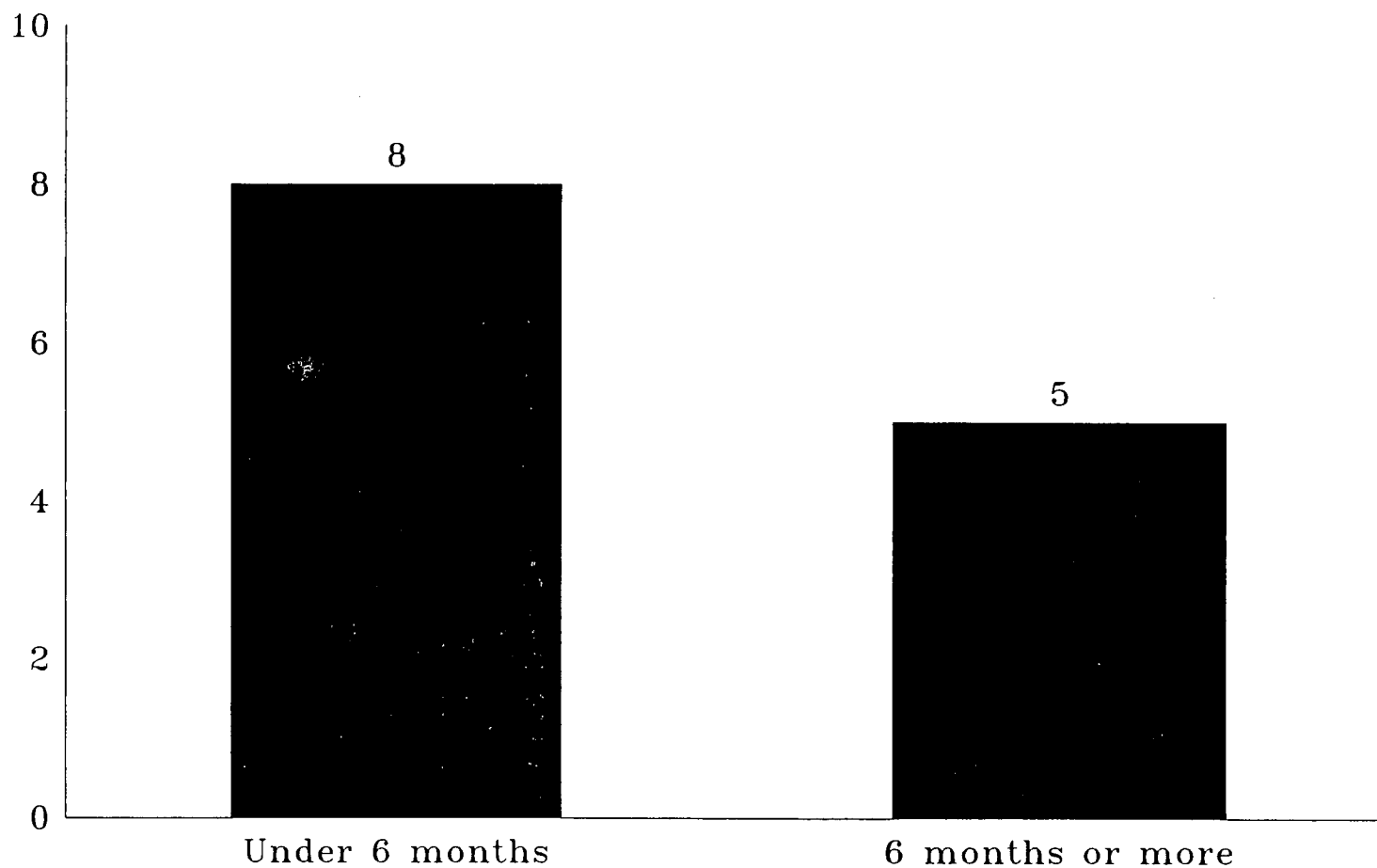
CP&L Fitness for Duty Program Length of Service of Employees With Violations



For January 3, 1990 - December 31, 1990
8 employees

CP&L Fitness for Duty Program

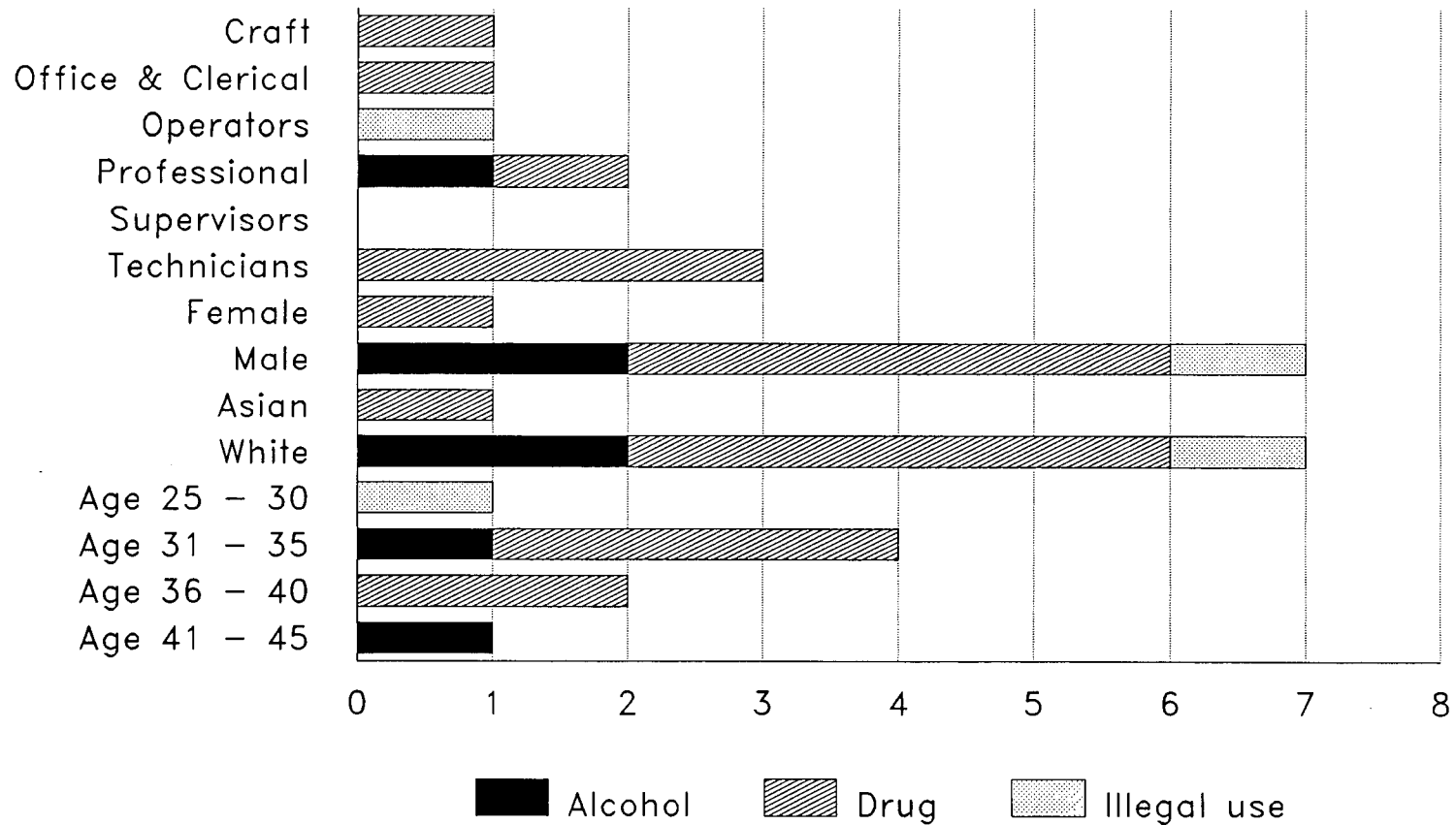
Length of Service of Contractors with
Violations on Random & For Cause Tests



For January 3, 1990 - December 31, 1990
13 contractors

CP&L Fitness for Duty Program

Characteristics of Employees
with Violations



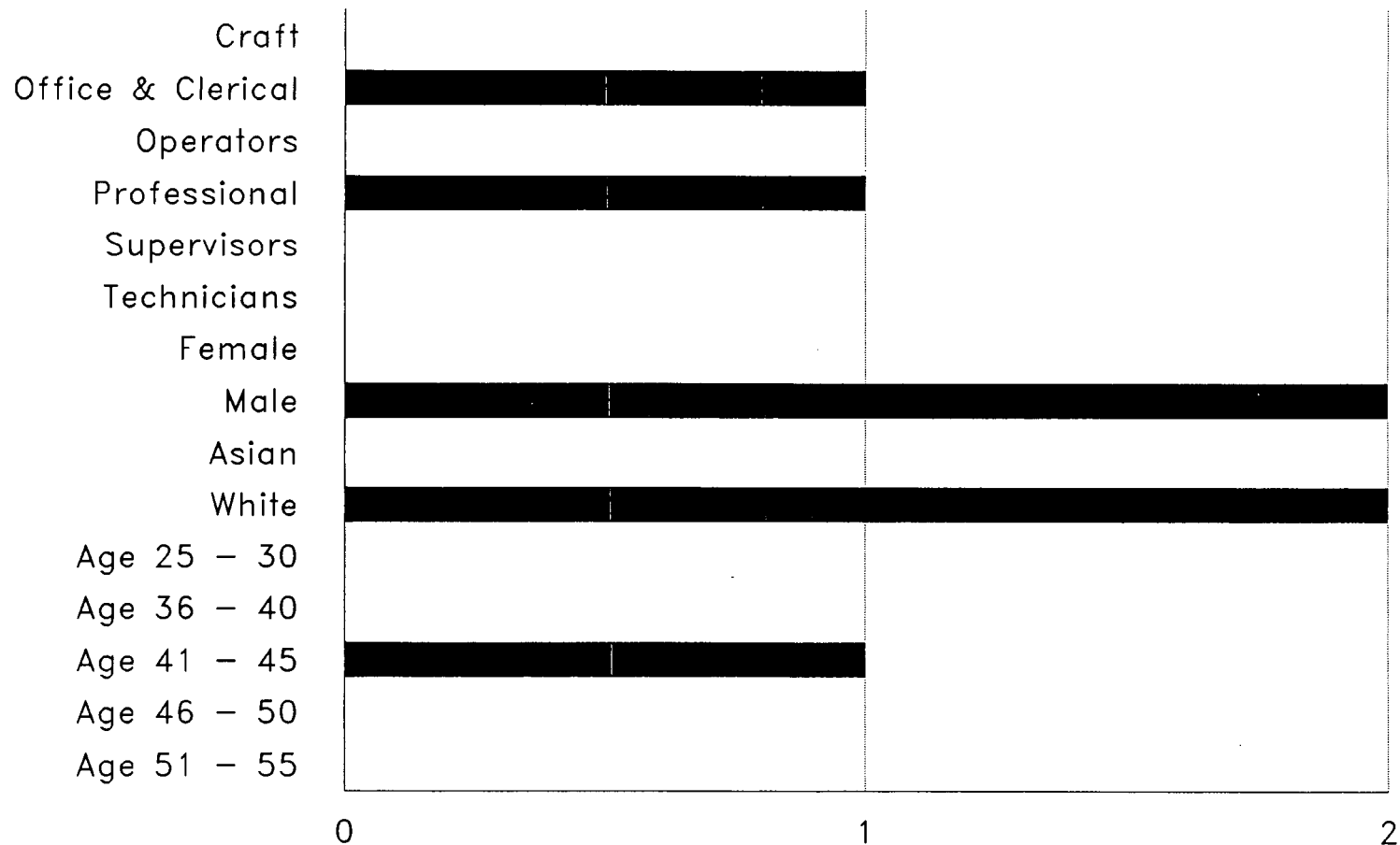
For January 3, 1990 - December 31, 1990

2 alcohol + 5 drug + 1 illegal use =

8 violations

CP&L Fitness for Duty Program

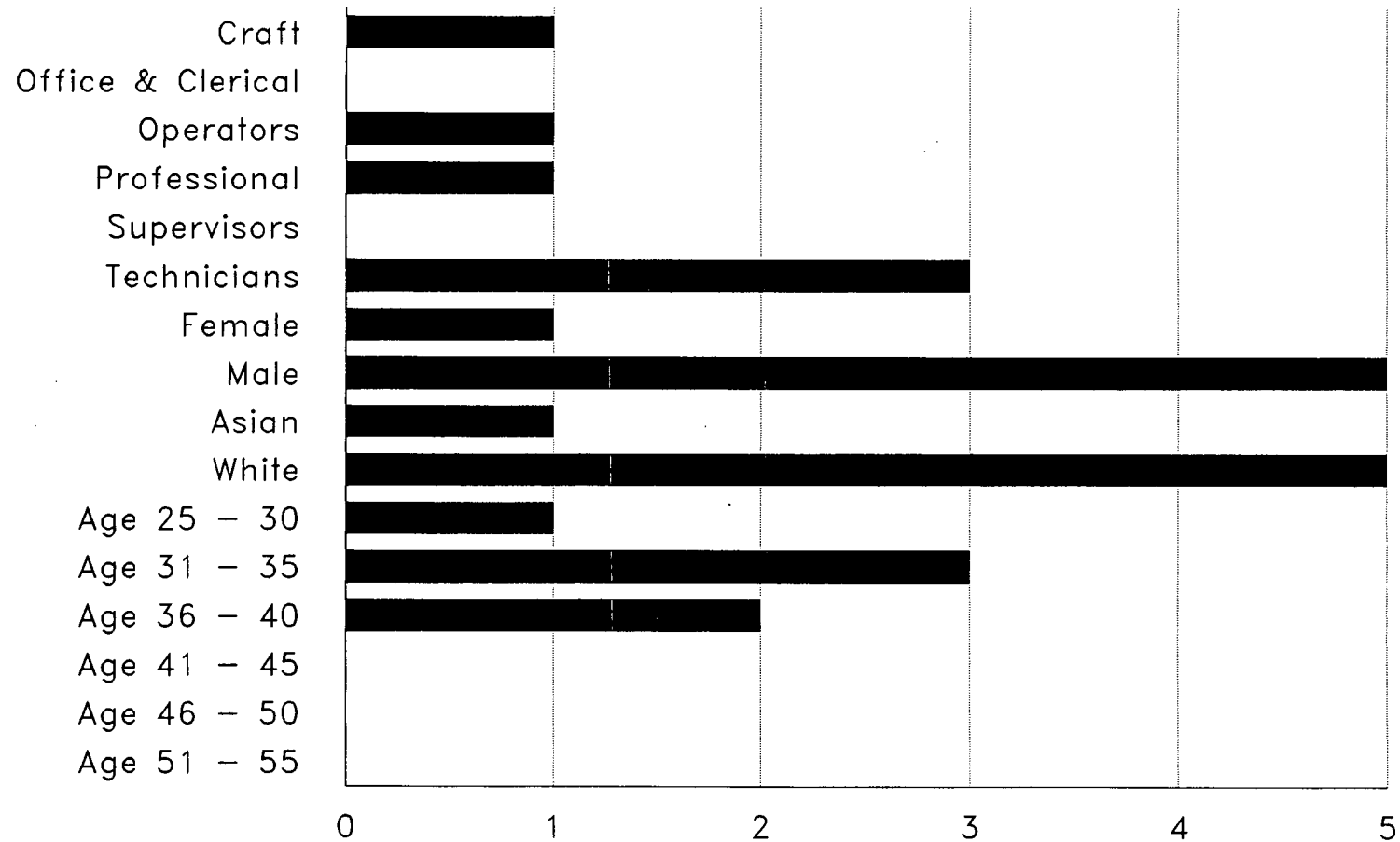
Characteristics of Employees with Alcohol Violations



For January 3, 1990 - December 31, 1990
2 alcohol violations (age of 1 unknown)

CP&L Fitness for Duty Program

Characteristics of Employees
with Drug and Illegal Use Violations

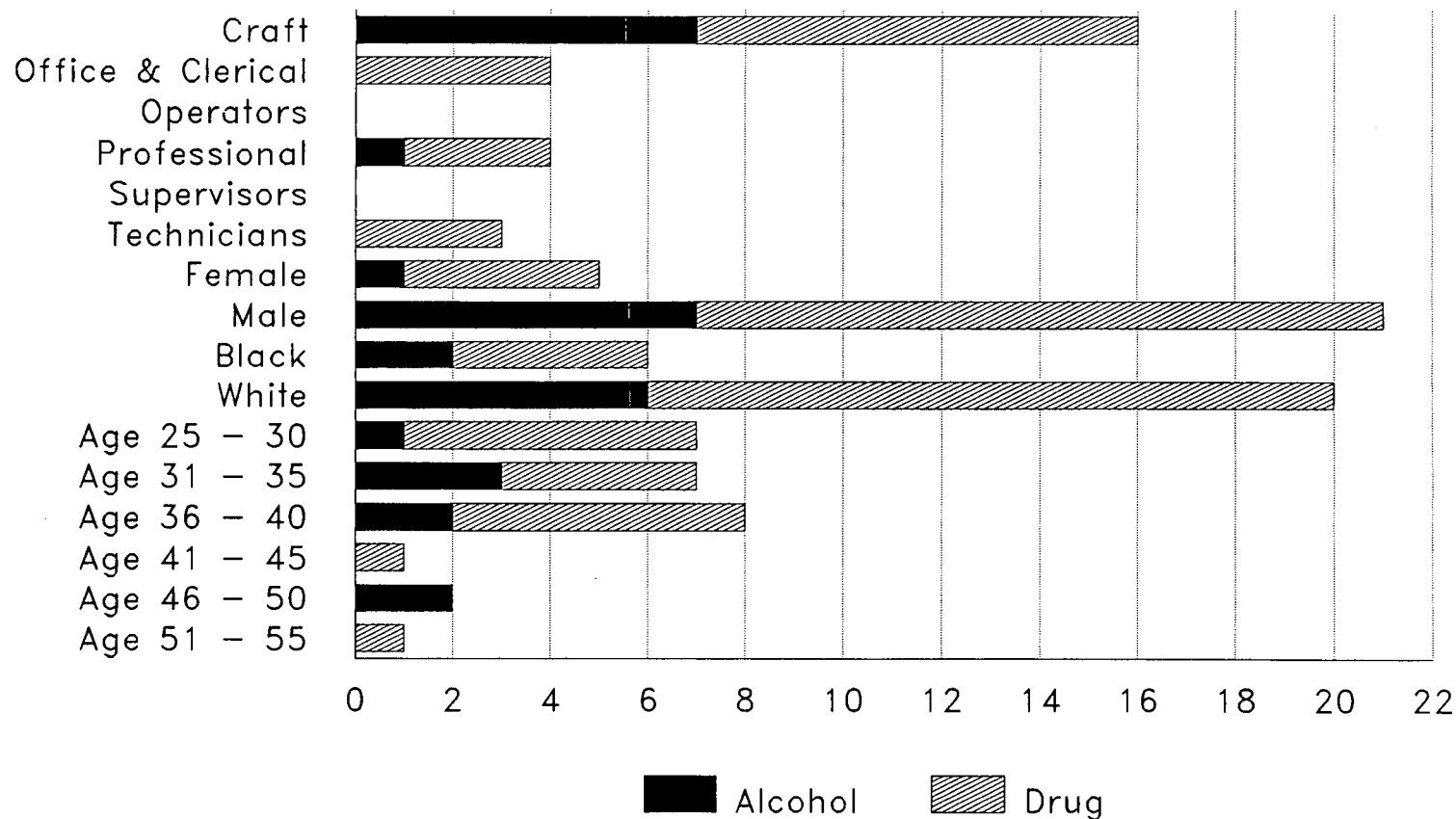


For January 3, 1990 - December 31, 1990

5 drug + 1 illegal use = 6 violations

CP&L Fitness for Duty Program

Characteristics of Contractors
with Violations



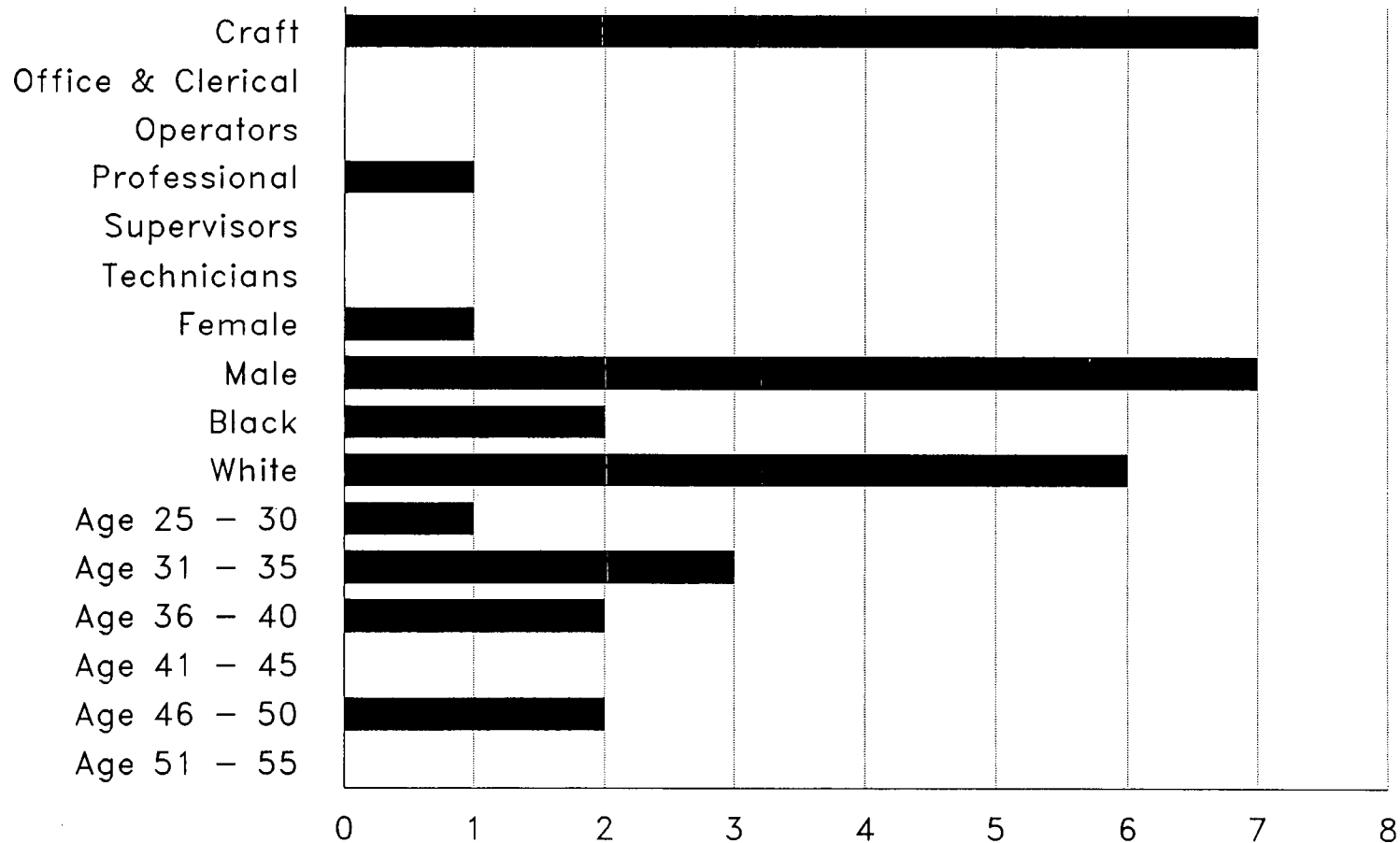
For January 3, 1990 - December 31, 1990

8 alcohol + 19 drug = 27 violations

2 refusals not included

CP&L Fitness for Duty Program

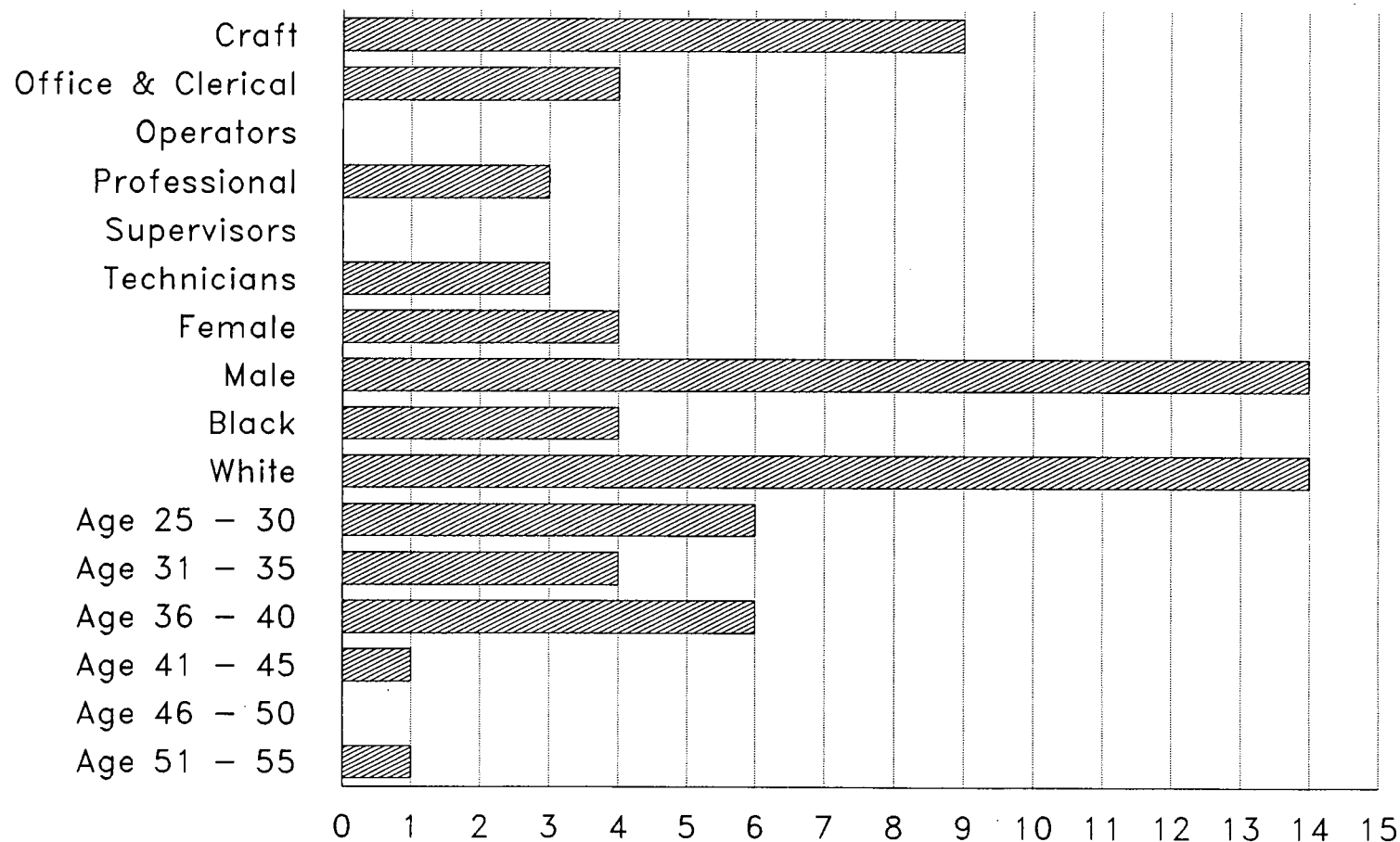
Characteristics of Contractors with Alcohol Violations



For January 3, 1990 - December 31, 1990
8 contractors with alcohol violations

CP&L Fitness for Duty Program

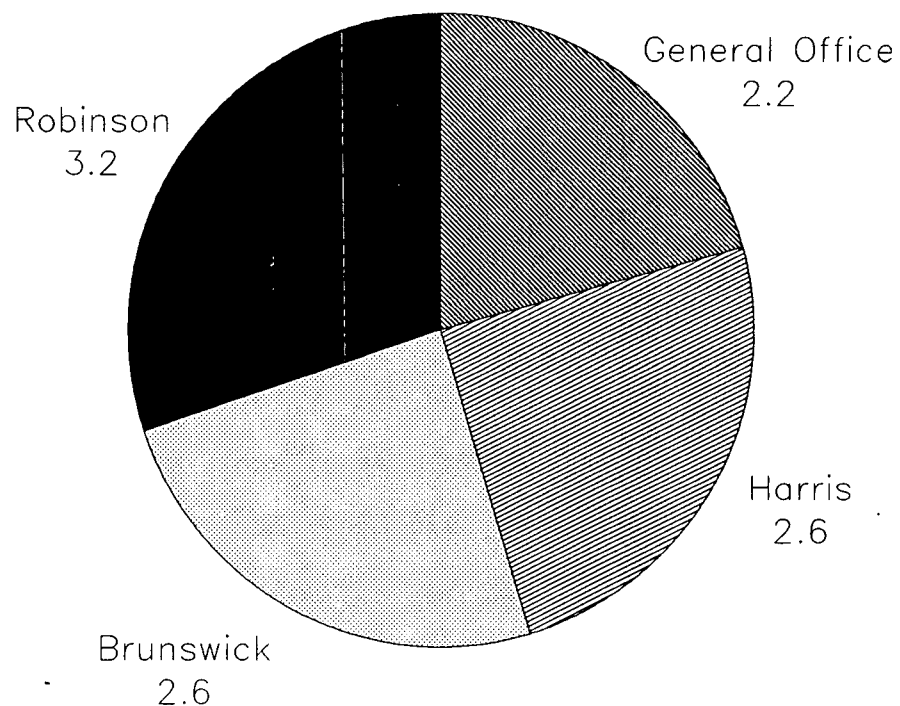
Characteristics of Contractors with Drug Violations



For January 3, 1990 - December 31, 1990
19 drug violations by contractors

CP&L Fitness for Duty Program

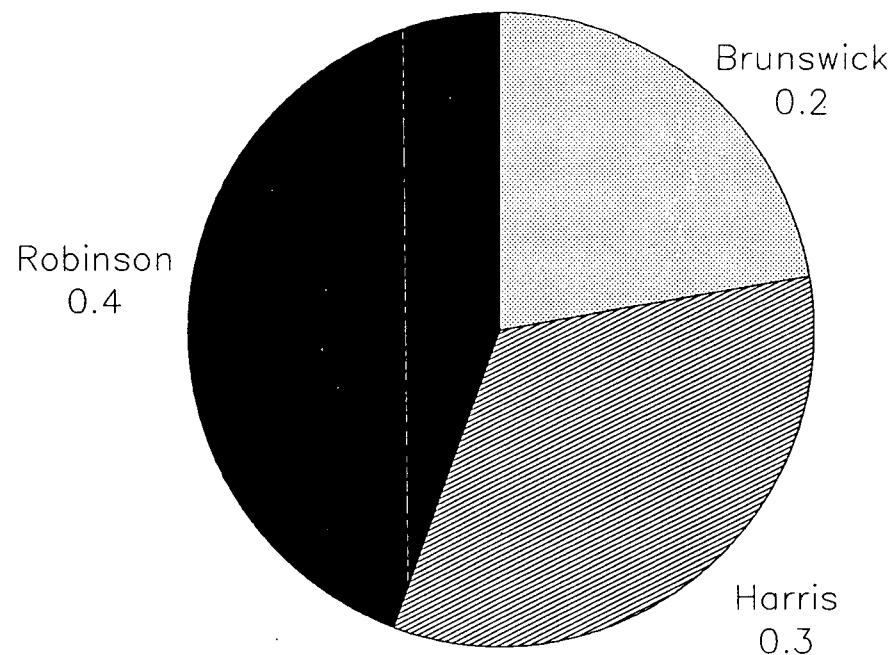
Employee Assistance Program
Rate of FFDP Self Referrals



Rate of Self Referrals

For January 3, 1990 – December 31, 1990
27/1010 BNP; 20/779 HNP; 16/503 RNP
10/463 GO

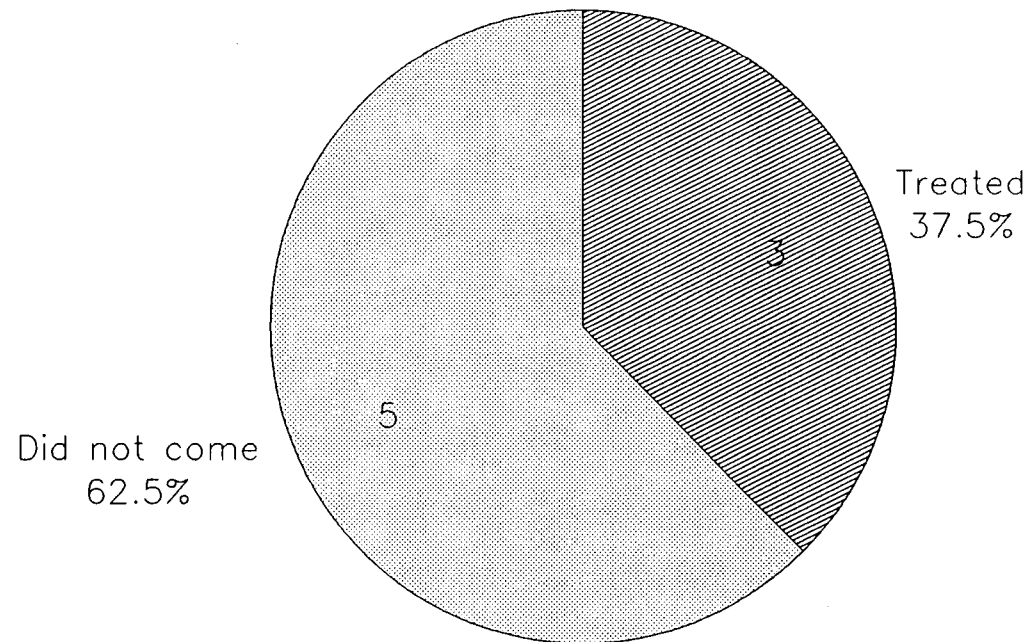
CP&L Fitness for Duty Program Employee Assistance Program Rate of Supervisory Referrals



Rate of Supervisory Referrals at Plants

For January 3, 1990 – December 31, 1990
2/1010 BNP; 2/779 HNP; 2/503 RNP
 $6/2292 = 0.3\%$ overall rate

CP&L Fitness for Duty Program
Employee Assistance Program
Outcome of FFDP Violation Referrals



All treated employees returned to work

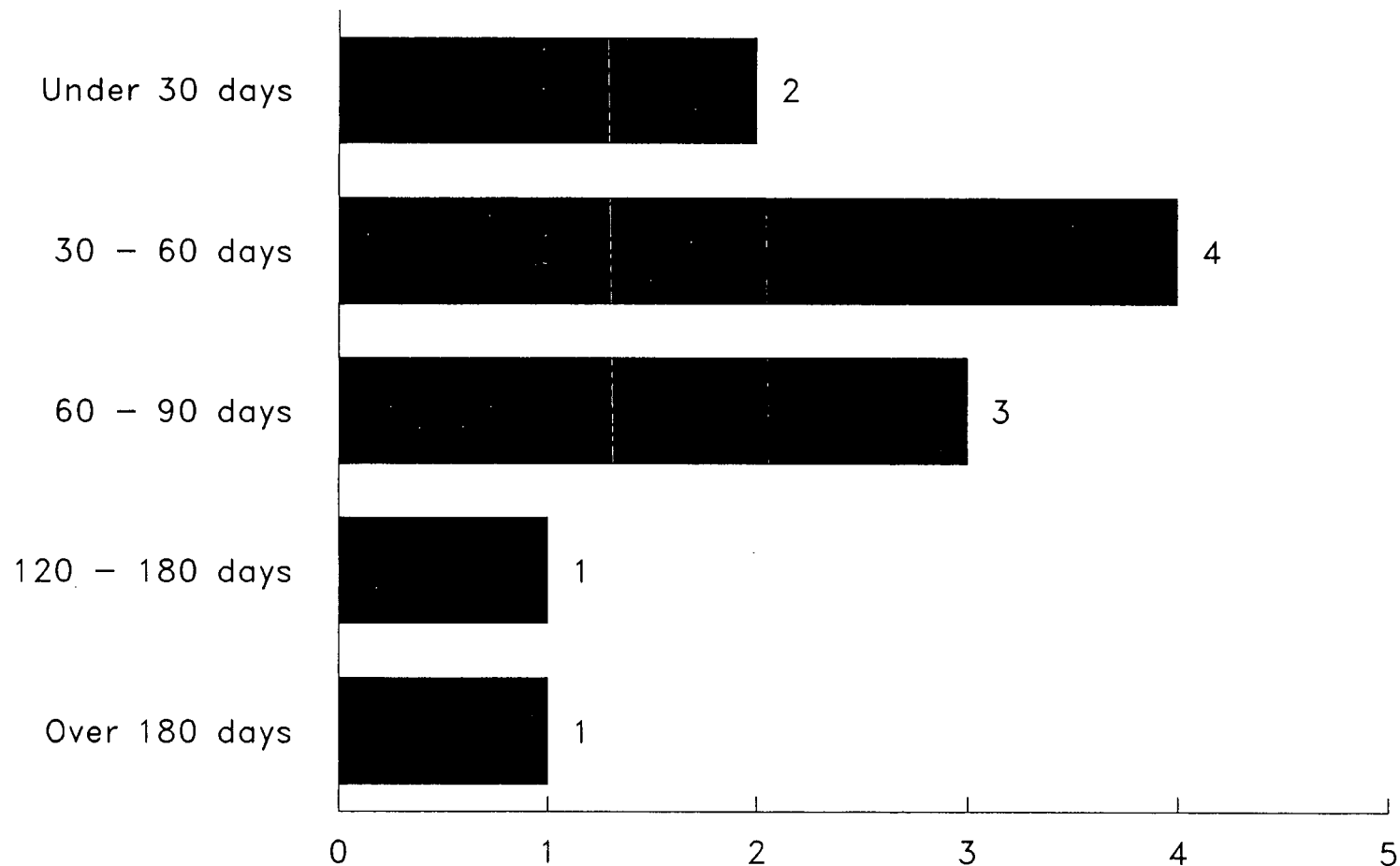
For January 3, 1990 - December 31, 1990
5 drug + 2 alcohol + 1 illegal use = 8
Alcohol & illegal use came; drug did not

CHART 27

CP&L Fitness for Duty Program

Violations by Workers Previously Tested

Interval Between First & Second Tests

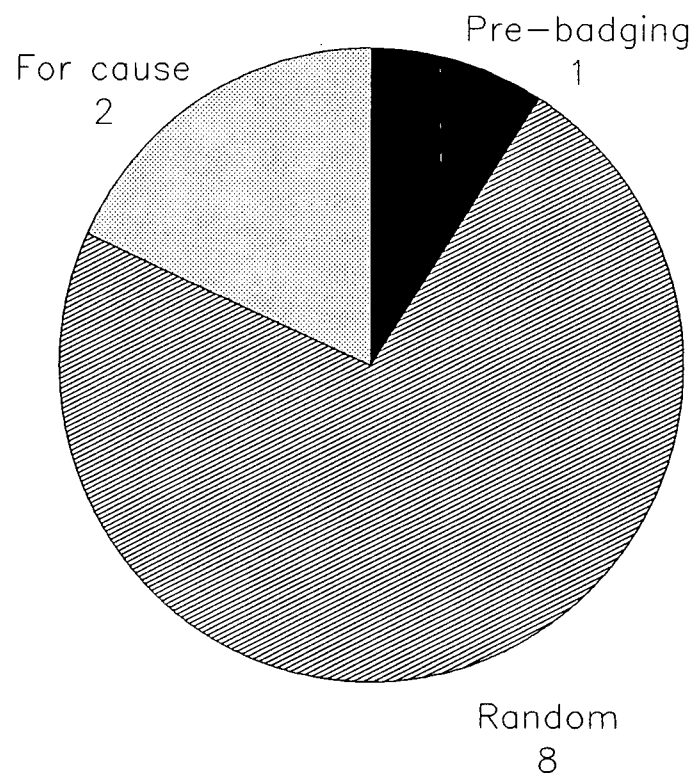


For January 3, 1990 - December 31, 1990
11 negative on 1st test, positive on 2nd

CP&L Fitness for Duty Program

1st Test Negative and 2nd Test Positive

Type of 2nd Test

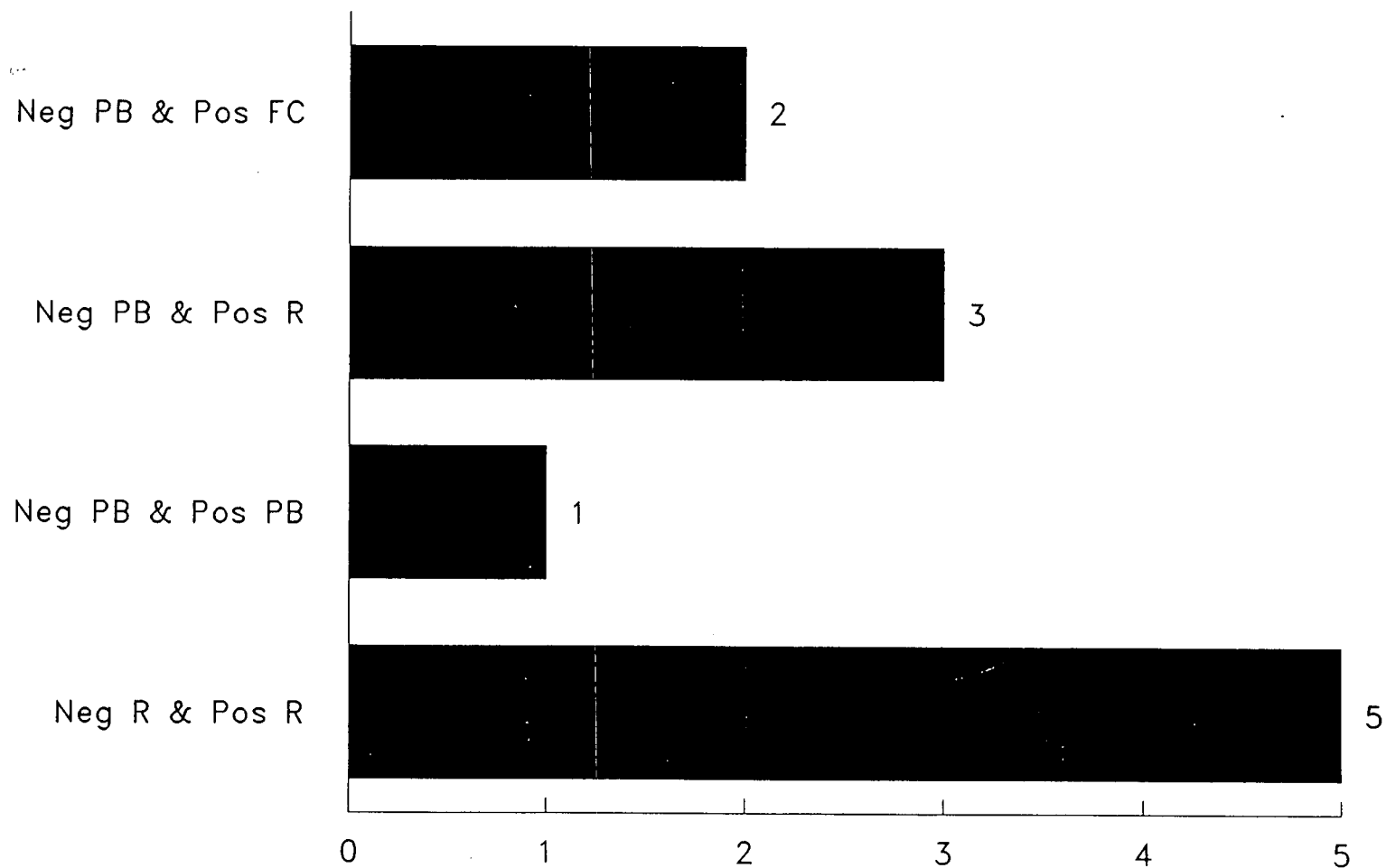


For January 3, 1990 – December 31, 1990
Eleven workers tested positive the
second time they were tested.

CP&L Fitness for Duty Program

Violations by Workers Previously Tested

Types of First and Second Tests



For January 3, 1990 - December 31, 1990