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ACCESSION NBR: 9109040386 DOC. DATE: 91/08/29 NOTARIZED: NO DOCKET #  
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AUTH. NAME FLOYD, S.D. AUTHOR AFFILIATION Carolina Power & Light Co.  
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SUBJECT: Forwards 10CFR26 fitness-for-duty program performance data for Jan-June 1991.

DISTRIBUTION CODE: A021D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 9/4  
 TITLE: "Semiannual Fitness for Duty Program Performance Rept/Data" 10CFR26.7 /

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# Carolina Power & Light Company

Nuclear Services Department  
411 Fayetteville Street Mall - P.O. Box 1551  
Raleigh, North Carolina 27602

AUG 29 1991

SERIAL: NLS-91-224  
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

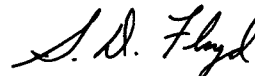
Gentlemen:

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 January 1, 1991 through June 30, 1991.

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 (1264GLU)

Enclosures

cc: Mr. S. D. Ebnetter  
Mr. L. Garner (NRC-HBR)  
Mr. N. B. Le  
Mr. R. Lo  
Ms. B. L. Mozafari  
Mr. R. L. Prevatte (NRC-BSEP)  
Mr. J. E. Tedrow (NRC-SHNPP)

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CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program

(January 1, 1991 - June 30, 1991)

PERFORMANCE DATA

Approved:

*Fred Blackwood 8/20/91*  
Program Director, Fitness For Duty

## CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program  
January 1, 1991 - June 30, 1991

### 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 safely 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  
January 1, 1991 - June 30, 1991

### EFFECTIVENESS EVALUATION

OVERALL TEST RESULTS			
TEST RESULTS BY TEST CATEGORY			
	Number of Tests	Positive Tests	Percent Positive
Pre-badging *	1,177	6	0.51%
Random	2,730	14	0.51%
For-Cause	6	** 2	33.0%
Follow-Up	6	0	0.0%
Other	0	0	0.0%
TOTAL	3,919	22	0.56%
* Includes pre-employment			
** One of these was a refusal to participate			
NOTE: The above chart does not include one illegal use of legal drugs. This was a non-testing violation of the program.			

CP&L conducted 3,919 tests at its four collection facilities. The overall positive rate was 0.56% across all categories of tests. Pre-badging testing identified 6 workers as having positive test results. Of those workers who had unescorted access to the protected area, 14 were identified as having positive test results for drugs or alcohol based on random tests, two were found positive based on for-cause tests, of which one refused to participate in testing.

Comparing the number of positive test results, random testing accounted for the majority of all positive tests (14/22; 63.6%), followed by pre-badging (6/22; 27.3%) and For-Cause Testing (2/22; 9.0%).

Two out of six for-cause tests were positive. This result is reasonable since for-cause tests are based on referral by a supervisor trained in behavioral observation techniques. Also, any post-accident tests that may have been conducted would have been reported in this category.

## **CAROLINA POWER & LIGHT COMPANY**

Fitness For Duty Program  
January 1, 1991 - June 30, 1991

### **EFFECTIVENESS EVALUATION**

#### **SUMMARY OF MAJOR FINDINGS**

- Drug and/or alcohol use in violation of the Company's Fitness For Duty Program was confirmed in 0.56% of the tests.
- Most of the positive tests were among workers who were inside the protected area.
- There was one FFD violation by a licensee employee as a result of the illegal use of legal drugs.

# CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program  
January 1, 1991 - June 30, 1991

## EFFECTIVENESS EVALUATION

Test Results by Worker Category				
Type of Test	Licensee Employees	Short-Term Contractors	Total	Percent
PRE-BADGING				
Number Tested	292*	885	1177	
Number Positive	0	6	6	0.51%
RANDOM				
Number Tested	1556	1174	2730	
Number Positive	4	10	14	0.51%
FOR-CAUSE				
Number Tested	3	3	6	
Number Positive	1	1**	2	33.0%
FOLLOW-UP				
Number Tested	6	0	6	
Number Positive	0	0	0	0.0%
TOTAL				
Number Tested	1857	2062	3919	
Number Positive	5	17	22	0.56%
* Includes pre-employment				
** Refusal to participate				

The majority of tests for licensee employees and contractors were a result of the random testing program. The number of positive random tests was significantly higher for contractors than licensee employees, 10 versus 4 respectively, or one positive for every 177 contractors randomly tested, versus one positive random test for every 389 licensee employees tested. The availability rate for persons selected as primary for random testing during this reporting period was 84.7%.

Pre-badging test results showed that there were no violations among the 292 applicants and employees who underwent pre-badging testing versus one positive test result for each 147 contractors.

## CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program  
January 1, 1991 - June 30, 1991

### EFFECTIVENESS EVALUATION

Positive test results from For-Cause testing by licensee employees and contractors were the same -- 3 employees and 3 contractors were tested with one positive test result in each category.

Follow-up testing is only applicable to licensee employees due to the Company's sanction of denial of access for contractors who test positive. Also, licensee employees who test positive for drugs are terminated; therefore, follow-up testing is applicable to CP&L employees who have an FFD alcohol violation, and who after being determined to be Fit For Duty are re-assigned to their original duties. Thus far, there have been no violations resulting from follow-up testing of licensee employees.

Referrals to the EAP as a result of FFD violations were 5 with one (the alcohol violation) employee being re-assigned to normal duties. The EAP is available to only CP&L employees and acts as a referral service for terminated employees who have tested positive for drugs and desire to seek treatment.

During this reporting period 2,730 tests were randomly conducted while the average number of workers with unescorted access was 4,809 which represents a testing rate of 56.8% for the first 6 months -- the Company's reporting period goal was 52%.

### SUMMARY OF MAJOR FINDINGS

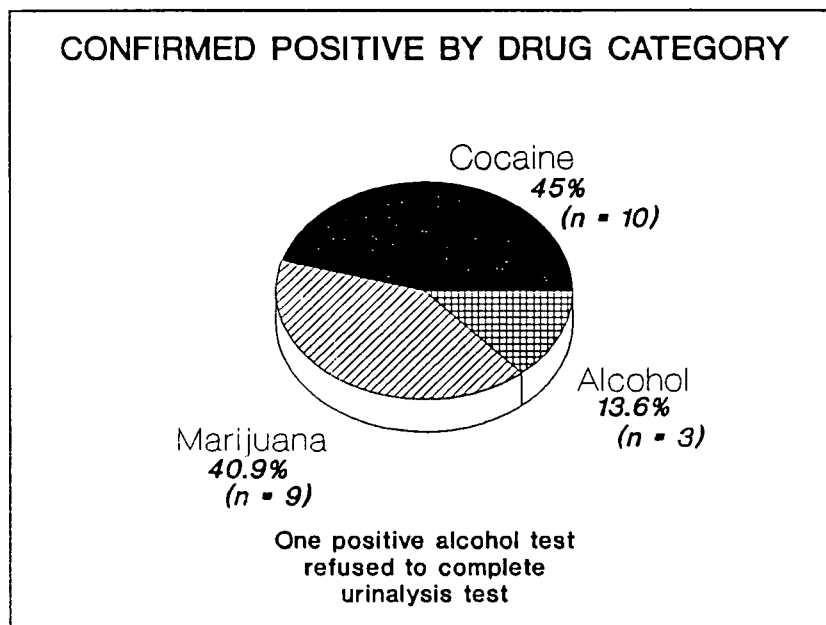
- Positive test rates were the same (0.51%) for pre-badging and random. Contractors accounted for 16 violations from these two types of testing compared to 4 violations by licensee employees.
- CP&L's hiring process may be more selective than the contract employer's based upon the number of pre-badging FFD violations -- 6 for contract employers compared to none for CP&L.
- The Company exceeded the goal of 52% for the random testing rate by approximately 4.8%.



## CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program  
January 1, 1991 - June 30, 1991

### EFFECTIVENESS EVALUATION



The above chart shows the percentage of positive test results for each category of drug and for alcohol specified in the Company's Fitness For Duty Program. Of the total confirmed positive tests by substance (n = 22 confirmed positive test results) the most (45%) were positive for cocaine. Marijuana was next with 40.9% of the total confirmed positive tests followed by alcohol (13.6%).

### SUMMARY OF MAJOR FINDINGS

Cocaine was found to be the major drug of abuse accounting for 45% of all positive tests followed closely by marijuana at 40.9%. This is contrary to what one might expect because one would think marijuana would account for most of the positive tests followed by cocaine. Only alcohol positive results at 13.6% is about what one would expect to find, based upon published information.

## CAROLINA POWER & LIGHT COMPANY

Fitness For Duty Program  
January 1, 1991 - June 30, 1991

### APPEALS

There was one appeal during this reporting period. The appeal originated from a contractor at the Brunswick Plant. The appeal by the contractor was based on "special processing" by CP&L of his specimen which confirmed the presence of an illegal substance. The appeal was heard by the Appeals Panel and was subsequently denied. The contractor remains permanently denied access to CP&L nuclear facilities.

### EVENTS REPORTED BY TELEPHONE UNDER 10 CFR 26.73

At 11:15 A.M., EST., on January 17, 1991, the Brunswick Plant Fitness For Duty Program Administrator was notified by the Medical Review Officer (MRO) of a confirmed positive drug test of a CP&L maintenance supervisor. The positive test was discovered as a result of random testing and the substance detected was marijuana. The supervisor was immediately denied access to the plant site following the MRO conference call and his employment was subsequently terminated. The supervisor was offered the opportunity to contact the EAP who would then refer the supervisor to a resource for assessment and counseling. This event was reported to the NRC Operations Center by telephone at 5:05 P.M., EST., on January 17, 1991.

### ACTIONS TAKEN TO CORRECT PROGRAM WEAKNESSES

- An electronic data transfer system has been developed and implemented to transfer the names of individuals in the random selection system from the plant sites to the mainframe in the General Office. The effect of this is to minimize the amount of time from badging to actually being eligible to be selected for random testing.
- Additional emphasis has been placed on conducting random tests on Saturdays and Sundays. The following is a result of this emphasis:

PLANT	YTD # OF SATURDAYS OR % (OUT OF POSSIBLE 26)	YTD # OF SUNDAYS OR % (OUT OF POSSIBLE 26)
Brunswick	11 or 42.3%	8 or 30.7%
Robinson	8 or 30.7%	4 or 15.3%
Harris	7 or 26.9%	6 or 23%

## **CAROLINA POWER & LIGHT COMPANY**

Fitness For Duty Program  
January 1, 1991 - June 30, 1991

### **ACTIONS TAKEN TO CORRECT PROGRAM WEAKNESSES (Continued)**

- Reference to permit FFD Appeals within 10 days following MRO confirmation has been deleted from our FFD Policies. The intent is to be more flexible in regards to the period in which an individual may file an appeal.

### **INITIATIVES TAKEN/LESSONS LEARNED**

- Substance abuse literature was placed in all the FFD Collection Facilities.
- Signs have been posted in the collection facilities to remind workers that there are no "safe periods" and that testing is conducted seven days a week, at all hours of the day.
- Because the definition of an unsatisfactory performance test is not clearly defined for reporting purposes to the NRC, the Company has developed its own internal guideline as to what an unsatisfactory performance test is and when the test should be reported to the NRC.
- Of the 22 FFD testing violations during this reporting period, 18 were in the months of January and February. The conclusion is that the Christmas and New Year's Holiday probably contributed to the increase in substance abuse.
- Our FFD Collection Facilities utilize the Intoxilyzer 5000 for Alcohol Breath Tests. We have found the breath alcohol test results and the blood tests results to be virtually the same. It is an extremely accurate instrument but it is also extremely sensitive to the operating environment. Therefore, regular scheduled maintenance should be performed at least once every 6 months.
- EAP utilization continues to be a strength of our Program. Approximately 1.6% of CP&L employees within the scope of FFD are self referrals. In addition, 8 employees were referred by their supervisor to the EAP.

**CAROLINA POWER & LIGHT COMPANY**

Fitness For Duty Program  
January 1, 1991 - June 30, 1991

**REPORTS OF BLIND PROFICIENCY SAMPLE ANALYSIS EVENTS**

The reports of two blind proficiency sample analysis events are enclosed. Report #1 addresses the fact that the laboratory analysis did not detect the presence of morphine in a blind sample and Report #2 addresses the fact that the instructions given by CP&L to the blind sample provider were misunderstood and a blind sample was incorrectly labeled. Both of these events were caused by human error (see enclosed reports).

[Based upon the Company's own internal guideline, we are submitting these for information purposes.]

## **BLIND SPLIT SAMPLE ANALYZED AT NIDA THRESHOLD RATHER THAN LIMITS OF DETECTION**

This report describes the events and actions associated with CP&L's contracted (NIDA-certified) split sample drug urinalysis laboratory's applying the NIDA cut-off levels to analyses they performed, rather than using their Limits of Detection (LOD) for these analyses.

### **BACKGROUND**

CP&L uses Roche Biomedical Laboratories in Research Triangle Park, N.C., to perform analyses of split samples as part of its Fitness For Duty Program. Blind samples are routinely submitted to Roche for analysis. These samples (like actual samples) identify the drug class for which a gas chromatography / mass spectrometry (GC/MS) analysis shall be performed without enzyme multiplied immunoassay technique (EMIT) screening.

Comprehensive Drug Testing, Inc., (CDT) in Los Angeles, CA, provides the blind samples.

Toxilab, Inc., in San Diego, CA, provides analytical services to CDT in determining the target values of the blind proficiency samples.

### **INCIDENT**

In early 1990, two blind samples containing both codeine and morphine were submitted to Roche for analysis. While the codeine was correctly identified at concentrations near the target values for this drug, the analyses did not detect the presence of morphine in the samples. The target values were the same for each drug class in both samples: codeine, 400 ng/ml; and morphine, 150 ng/ml.

### **CAUSE**

1. At the beginning of the FFD Program, CP&L did not provide specific instructions to Roche on the use of Limits of Detection, rather than the NIDA cut-offs, for the split sample analyses performed by the laboratory.
2. CDT provided CP&L with blind proficiency samples for codeine at target levels of 400 ng/ml codeine and 150 ng/ml morphine during the first two months of 1990. The codeine level is above the NIDA cut-off of 300 ng/ml (for both screening and confirmation testing) while the morphine level is below the same NIDA cut-off levels. CDT prepared the positive codeine samples in this manner purposely to mimic biological specimens that would be expected to contain morphine, in addition to codeine, due to metabolic conversion of some codeine to morphine. The purpose of preparing the codeine samples in this way was to avoid alerting the laboratory to the identity of a proficiency sample.

3. Roche performed the two analyses at the NIDA cut-off for confirmation testing, 300 ng/ml.

### CORRECTIVE ACTION

In mid-1990, Roche was directed to re-test each of the samples at their Limits of Detection. Each of these analyses yielded reported values for the morphine that were consistent with the target levels of 150 ng/ml.

### PREVENTIVE ACTION

In mid-February, 1990, Roche was instructed to use their internal Limits of Detection as the cut-off for GC/MS analyses.

### LABORATORY RESULTS

The following table demonstrates Roche's ability to detect morphine at levels both above and below the NIDA cut-offs for confirmation GC/MS analyses and to detect more than one opiate metabolite in a single sample.

SAMPLE IDENTIFICATION	TARGET LEVEL, CODEIENE (ng/ml)	TARGET LEVEL, MORPHINE (ng/ml)	DATE	REPORTED LEVEL, CODEIENE (ng/ml)	REPORTED LEVEL, MORPHINE (ng/ml)
MAY	400	150	1/24	374	negative
MAY (repeat)	400	150	7/21	N/A	165
BURNS	400	150	2/9	361	negative
BURNS (repeat)	400	150	6/16	412	149
FORTNER	- 0 -	500	3/9	negative	377
BURNHAM	- 0 -	500	3/20	negative	367
GAILEY	399	153	3/19	386	139

## **INCORRECTLY LABELED BLIND SAMPLE**

This report describes the events and actions associated with CP&L's contracted blind proficiency samples provider incorrectly identifying the contents of a spiked urine sample.

### **BACKGROUND**

CP&L uses Roche Biomedical Laboratories in Research Triangle Park, N.C., to perform analyses of split samples as part of its Fitness For Duty Program. CP&L's contracted laboratory that performs analyses of initial urine sample aliquot was not involved in this event.

Comprehensive Drug Testing, Inc., (CDT) in Los Angeles, CA, provides the blind urine samples used to assess the proficiency of both the initial aliquot and split sample laboratories.

Toxilab, Inc., in San Diego, CA, provides analytical services to CDT in determining the target values or certifying the negative blind proficiency samples.

### **INCIDENT**

In December 1989, prior to the implementation of the Fitness For Duty Program at CP&L, CDT delivered to us several samples for use in the blind proficiency testing program. One of the samples that was labeled by CDT as positive for Cocaine was transferred to the sample bottles used in CP&L's collection facilities. The chain of custody forms were prepared and the sample was sent to Roche Laboratory for a cocaine analysis by GC/MS. The analysis was negative for cocaine.

### **CAUSE**

CDT had been provided short notice of CP&L's need for blind samples. CDT requested the samples from Toxilab by telephone. Their oral instructions were misunderstood by Toxilab which then prepared a sample positive for PCP rather than cocaine.

### **CORRECTIVE ACTIONS**

Roche was requested to perform EMIT screening for the five NIDA classes of drugs at the NIDA cutoffs. The screening and subsequent GC/MS confirmation testing were both positive for PCP.

Roche was directed to send an aliquot of the sample to CDT (Toxilab) for screening and GC/MS analysis for the NIDA panel of drugs at the NIDA cut-offs. The results of the second Roche analysis (positive for PCP) was not revealed to CDT or Toxilab.

Toxilab's analysis of the sample confirmed the Roche analysis, positive for PCP.

### **PREVENTIVE ACTIONS**

CDT will request samples from Toxilab only in writing to avoid the possibility of misunderstanding in the future. No requests will be made by telephone or other oral, undocumented means.

### **SUMMARY**

This incident should not be considered a case of Roche's unsatisfactory performance. Rather, their very acceptable performance helped identify other deficiencies in the blind proficiency testing program.

The administrative error, not laboratory analytical error, by CDT and Toxilab was corrected. All subsequent samples received from CDT during 1990 were correctly identified as negative or positive for the specific drug class as demonstrated by CP&L's two contracted laboratories that participate in the blind proficiency testing program.



**CAROLINA POWER & LIGHT COMPANY  
FITNESS FOR DUTY PROGRAM**

**January 1, 1991 - June 30, 1991**

**Lessons Learned or Trends**

- CHART #1: The largest percentage of workers are at the Brunswick Plant followed by the Harris, Robinson and General Office locations.
- CHART #2: The greatest number of violators were identified through random testing.
- CHART #3: Contractors committed almost three times as many violations of the Fitness For Duty Program as did employees.
- CHART #4: Drugs accounted for the largest percentage of violations with the majority being detected through random testing followed by pre-badging testing.
- CHART #5: Cocaine is the most used followed by marijuana and then alcohol.
- CHART #6: The largest number of violations occurred on Tuesday.
- CHART #7: The number of employees who violated the Fitness For Duty Program are evenly distributed among each plant site. The greatest number of contractor violations was at the Harris Plant followed by the Brunswick and Robinson Plants.
- CHART #8: The rate of violations at the plants was the same for both Harris and Robinson, with Brunswick being slightly less. This includes the fact that Brunswick is a two-unit plant and the other sites are one-unit.
- CHART #9: The largest number of violations occurred during the month of January. We believe an influencing factor in this was the Holiday season, as well as the on-going status of Desert Storm.
- CHART #10: This chart illustrates the proportion of employee violations to contractor violations per month.
- CHART #11: The number of violations do not appear to be concentrated in any one department with the exception of Nuclear Services which has had three violations. These three violations were among traveling maintenance crews. Our Employee Assistance Program continues to work with line

## Lessons Learned or Trends

Page 2

management concerning Fitness For Duty issues in the traveling maintenance crews.

CHART #12: Violations by CP&L employees occurred among employees with 5-9 years of experience with no violations having occurred among longer term employees.

CHART #13: All contractor violations occurred among contractors with less than six months work at our nuclear plants.

CHART #14: The characteristics of employees who most often violated the Fitness For Duty Program during this reporting period are white males, craft workers, in the age group of 25-35.

CHART #15: The characteristics of contractors who most often violated the Fitness For Duty Program during this reporting period are white males, craft workers, in the age group under 30.

CHART #16: This chart indicates there were ten individuals who screened negative on pre-badging and subsequently, were positive under the random program. Likewise, there were four individuals who tested negative under the random test and subsequently tested positive under a random test.

CHART #17: This chart illustrates that there were nine individuals who tested negative on the first test and subsequently tested positive on the second test which occurred between 120 to 180 days after the first negative test.

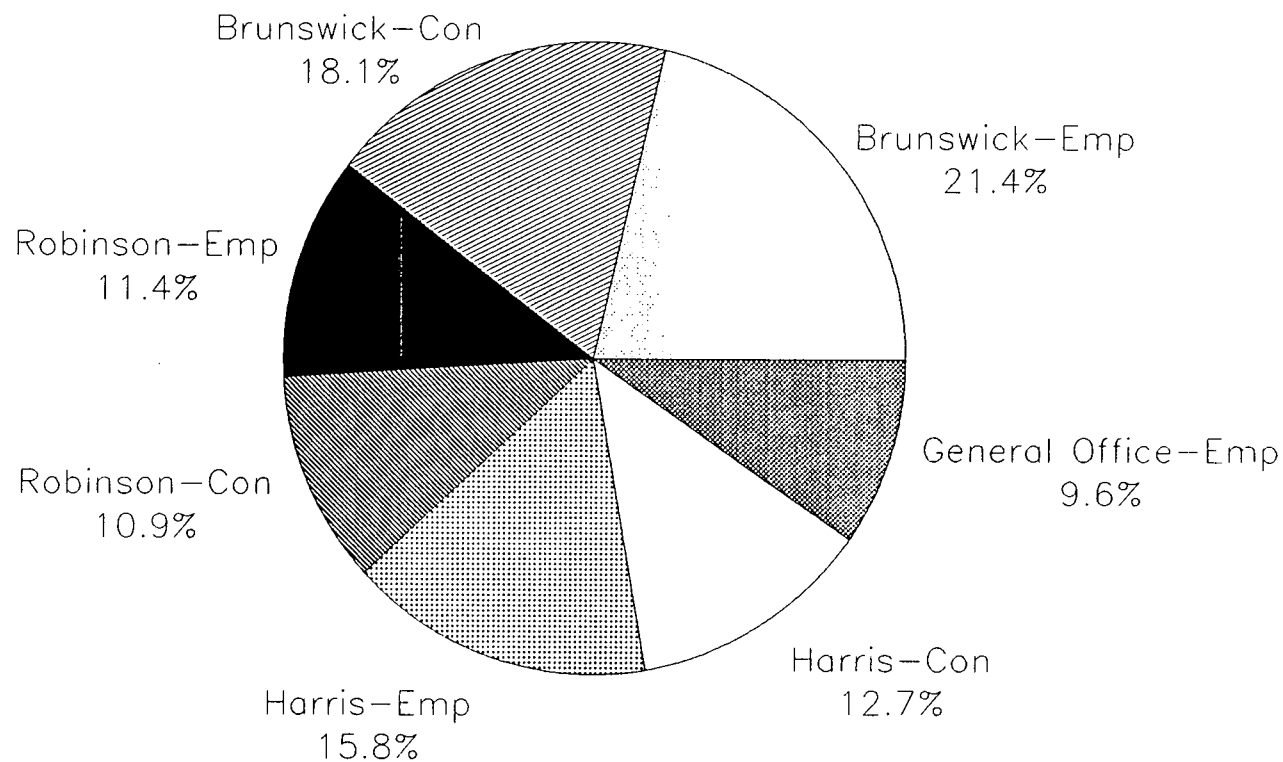
CHART #18: This chart indicates that significant emphasis has been placed on back-shift, holiday, and week-end testing.

CHART #19: This chart demonstrates the emphasis that has been placed on around-the-clock testing during this reporting period.

CHART #1

# CP&L Fitness for Duty Program

Distribution of Workers (4,809)



As of June 30, 1991

1029BNP+462GO+762HNP+550RNP= 2,803 Emp

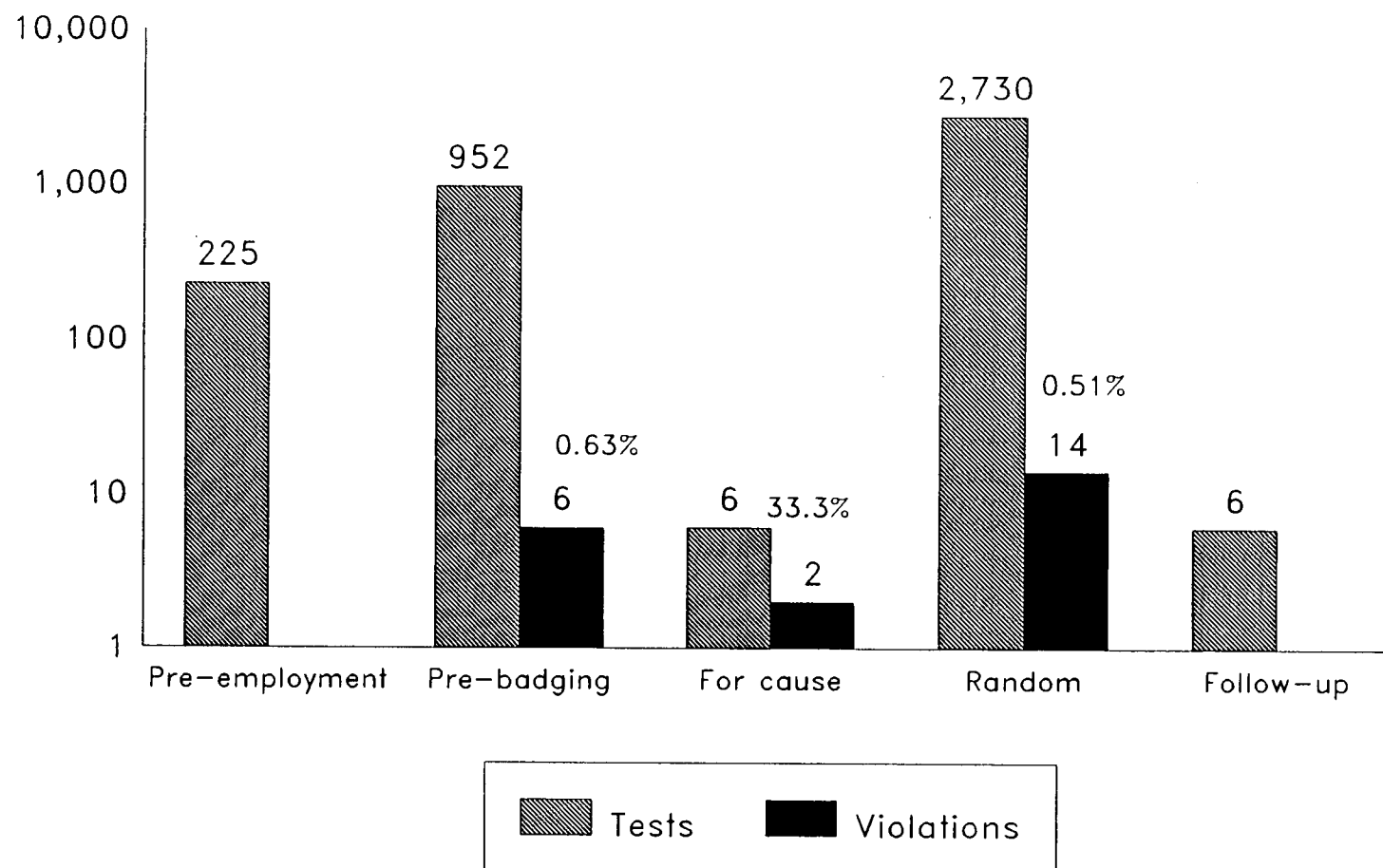
871 BNP + 609 HNP + 526 RNP = 2,006 Con

CHART #2

## CP&L Fitness for Duty Program

Violations Resulting from Testing

System Wide Jan. 1, 1991 – June 30, 1991



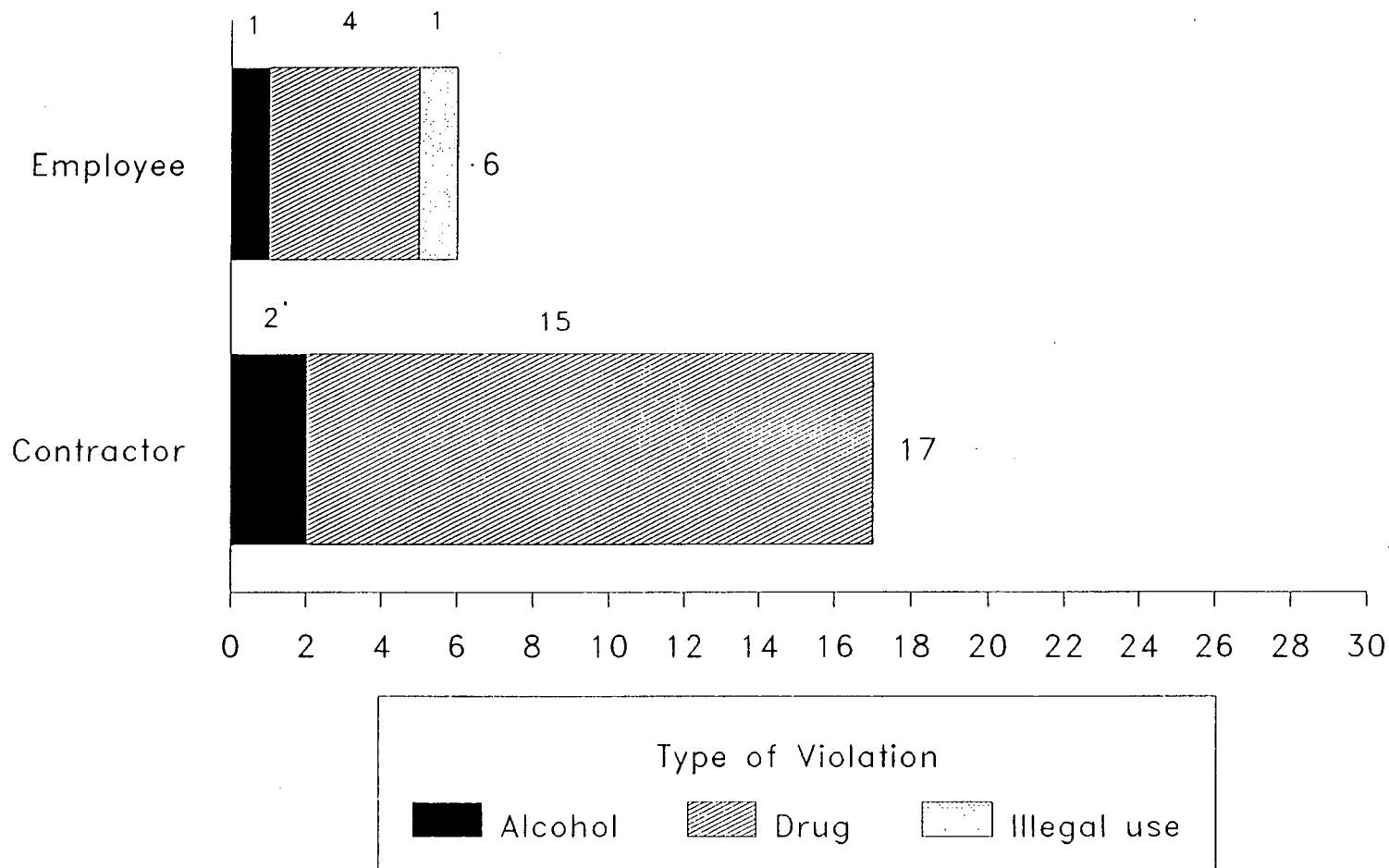
For January 1, 1991 – June 30, 1991

Total number of tests = 3,919

22 violations resulting from testing 0.56%

CHART #3

## CP&L Fitness for Duty Program Type of Worker and Type of Violation



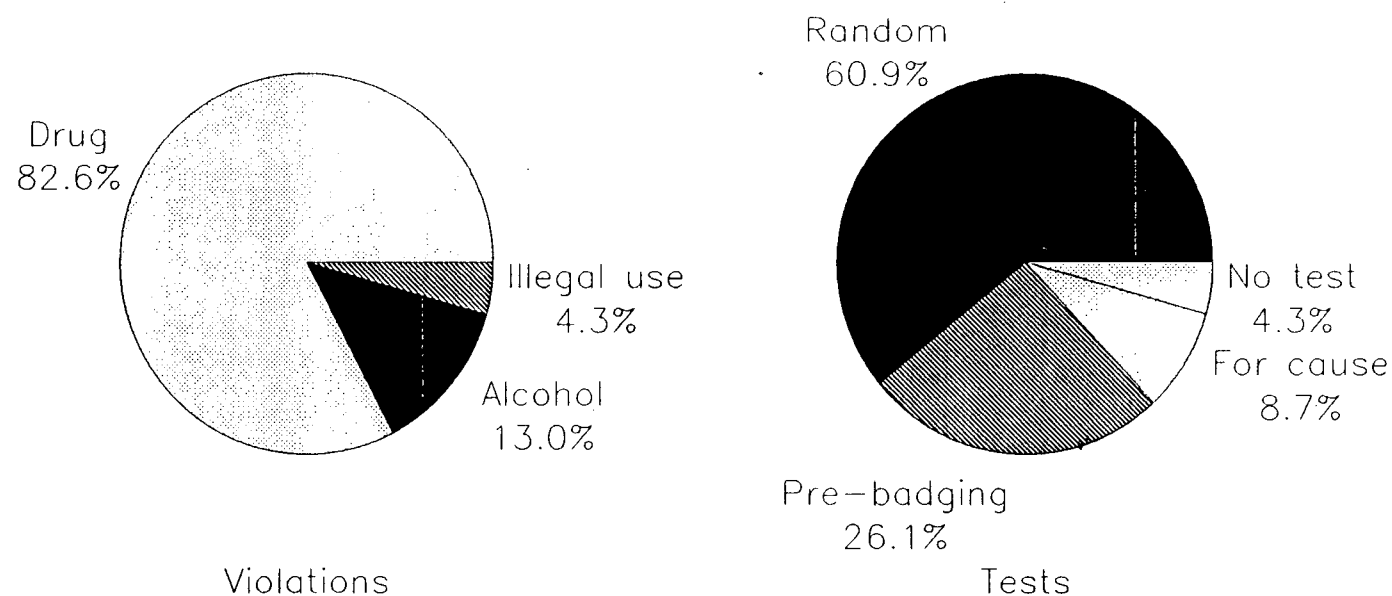
For January 1, 1991 - June 30, 1991  
6 employees + 17 contractors = 23

One refused to complete urinalysis

CHART #4

## CP&L Fitness for Duty Program

Distribution of Violations and  
Tests Detecting Violations



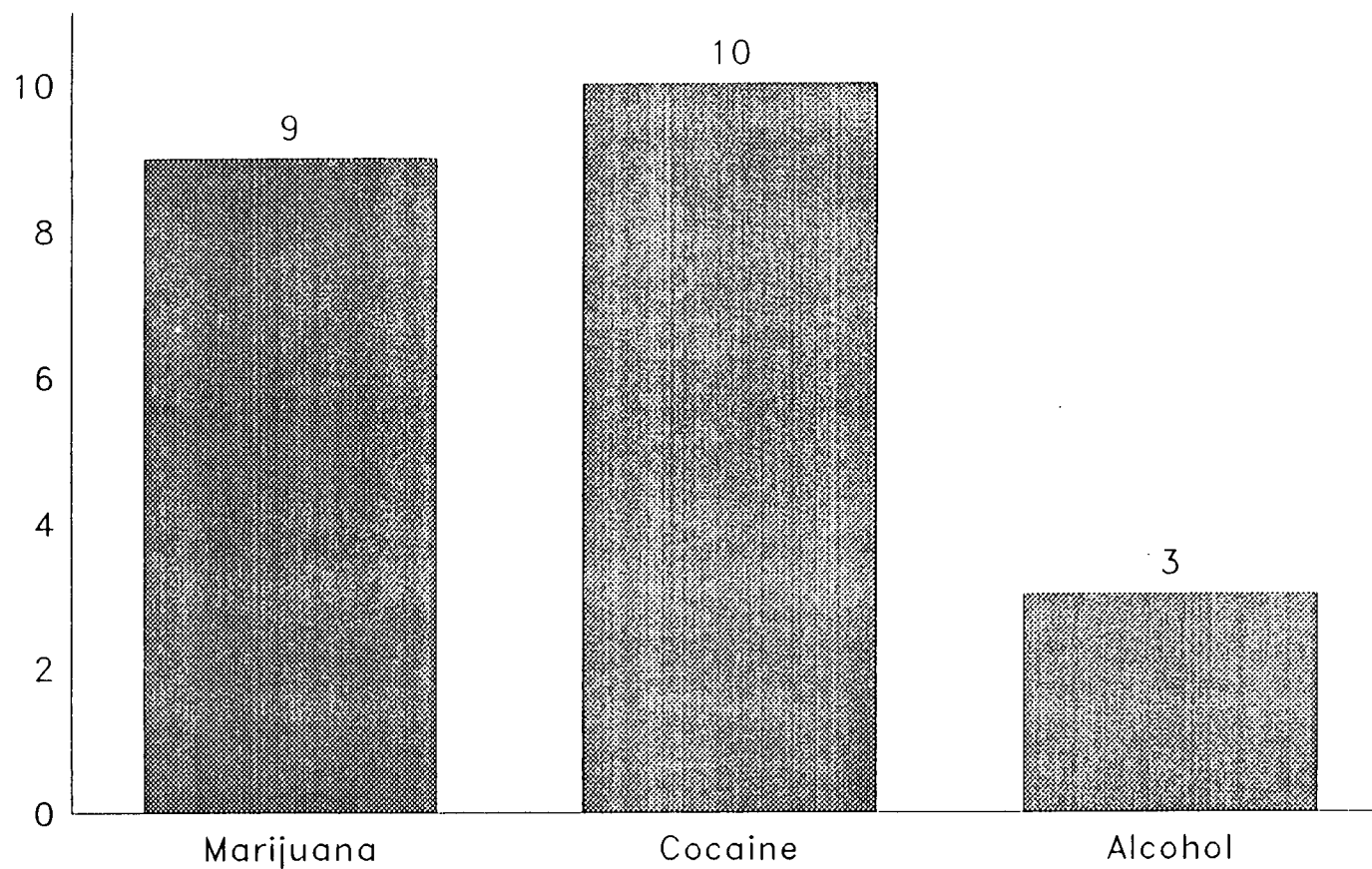
For January 1, 1991 - June 30, 1991  
19 drug + 3 alcohol +  
1 illegal use = 23 violations

One for cause refused to complete urinalysis

CHART #5

## CP&L Fitness for Duty Program

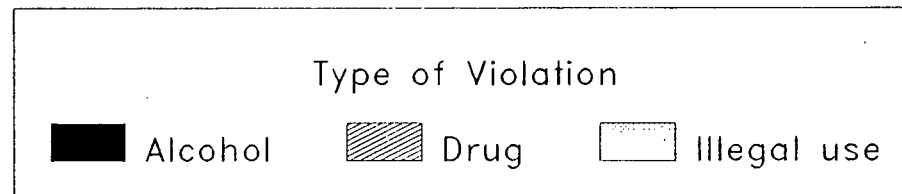
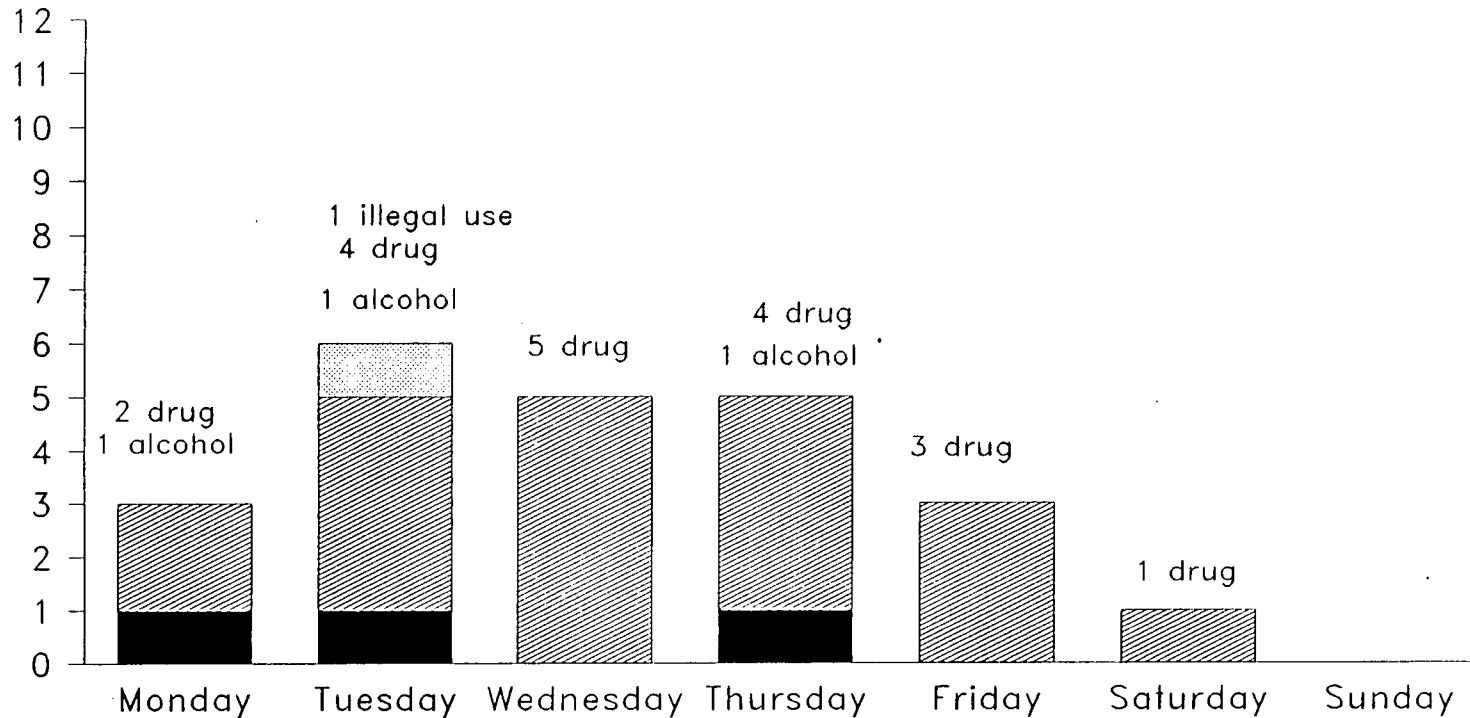
Confirmed Positive Substances



For January 1, 1991 - June 30, 1991  
Number of tests confirmed positive = 22  
Number of substances confirmed = 22

CHART #6

## CP&L Fitness for Duty Program Violations by Weekday



For January 1, 1991 - June 30, 1991  
Total violations = 23

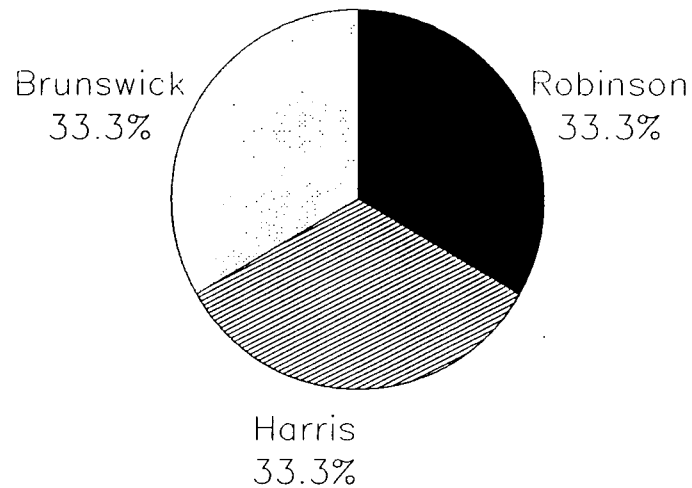
Refused to complete urinalysis



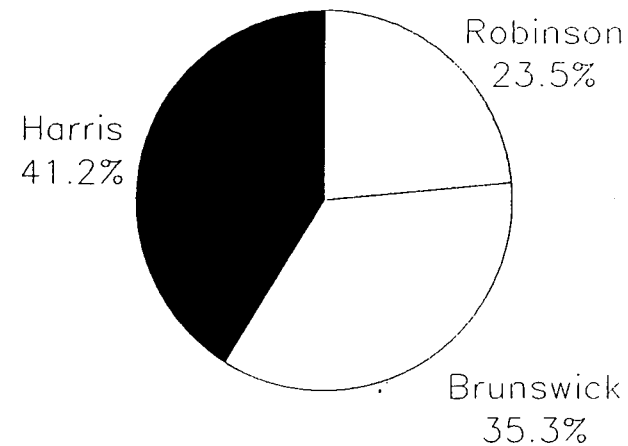
CHART #7

# CP&L Fitness for Duty Program

## Distribution of Employee and Contractor Violators



Where the Employee Violators Worked



Where the Contractor Violators Worked

For January 1, 1991 - June 30, 1991

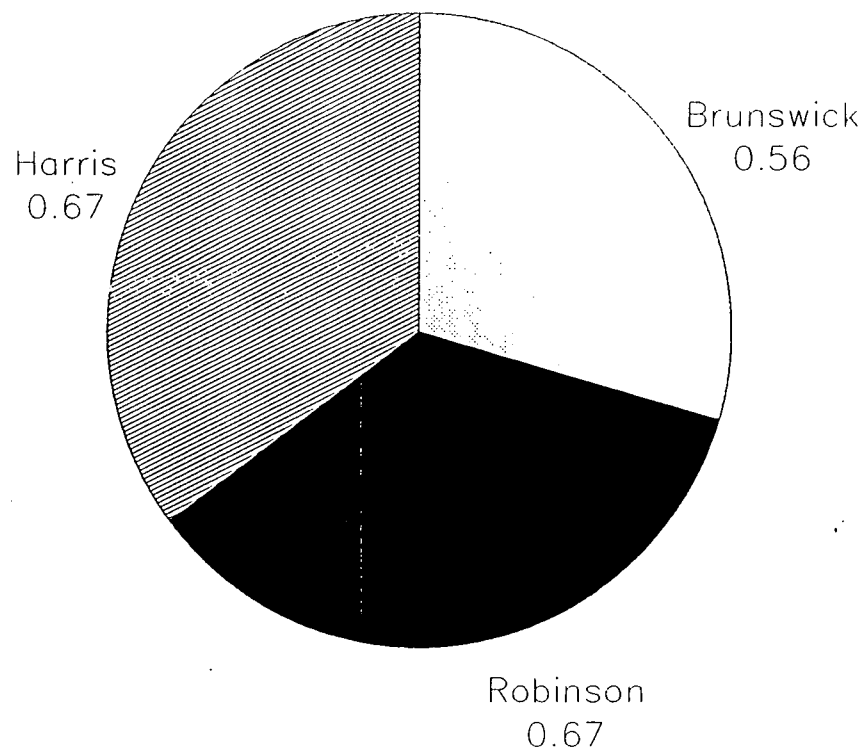
Employees: 2 BNP; 2 HNP; 2 RNP

Contractors: 6 BNP; 7 HNP; 4 RNP

CHART #8

# CP&L Fitness for Duty Program

Rate of Violations from Testing  
At Plants



Number violations/number tests x 100

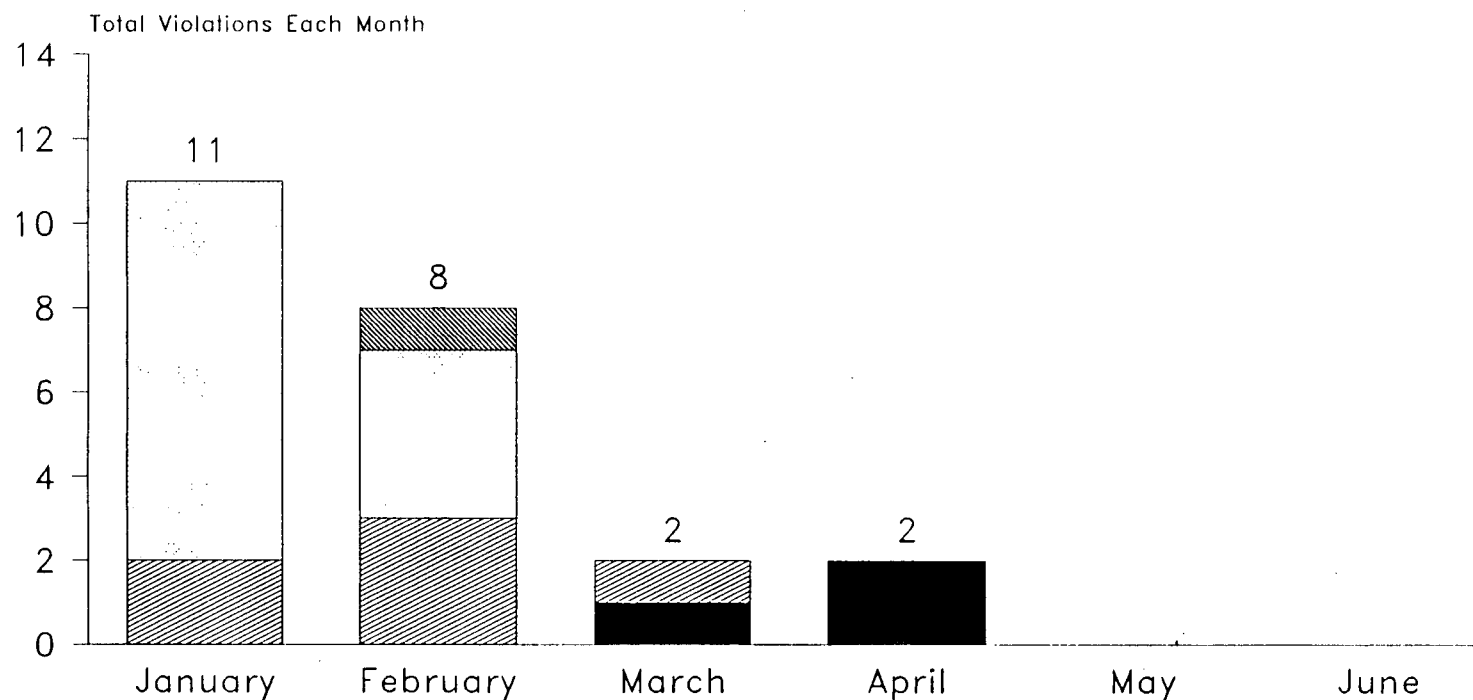
For January 1, 1991 - June 30, 1991  
8/1421 BNP; 9/1353 HNP; 5/747 RNP  
Includes all types of tests

Illegal use violation at RNP not included

CHART #9

## CP&L Fitness for Duty Program

### Violations per Month by Test Type



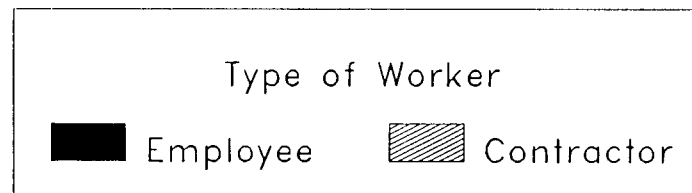
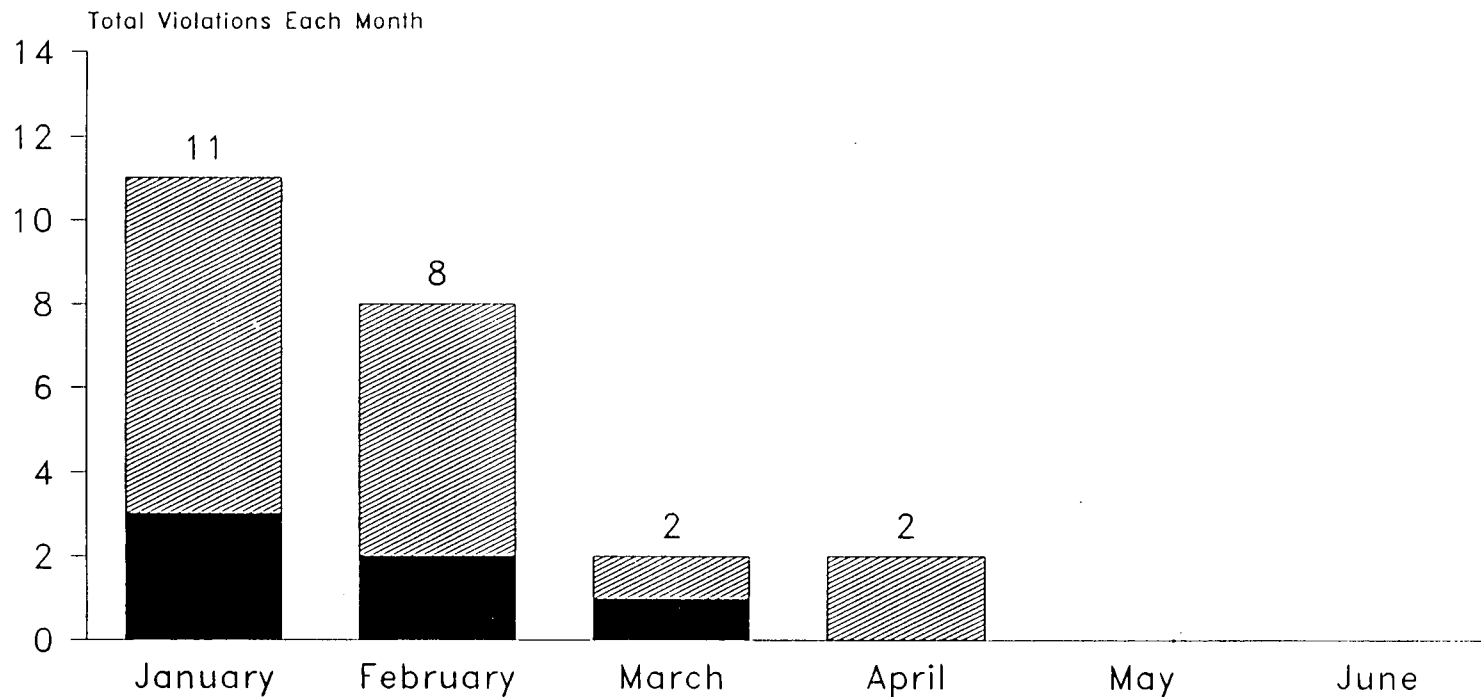
#### Type of Test

For cause    Pre-badging    Random    No test

For January 1, 1991 - June 30, 1991  
3 for cause + 6 pre-badging + 13 random  
+ 1 no test = 23 violations

CHART #10

## CP&L Fitness for Duty Program Violations per Month by Who Had Them

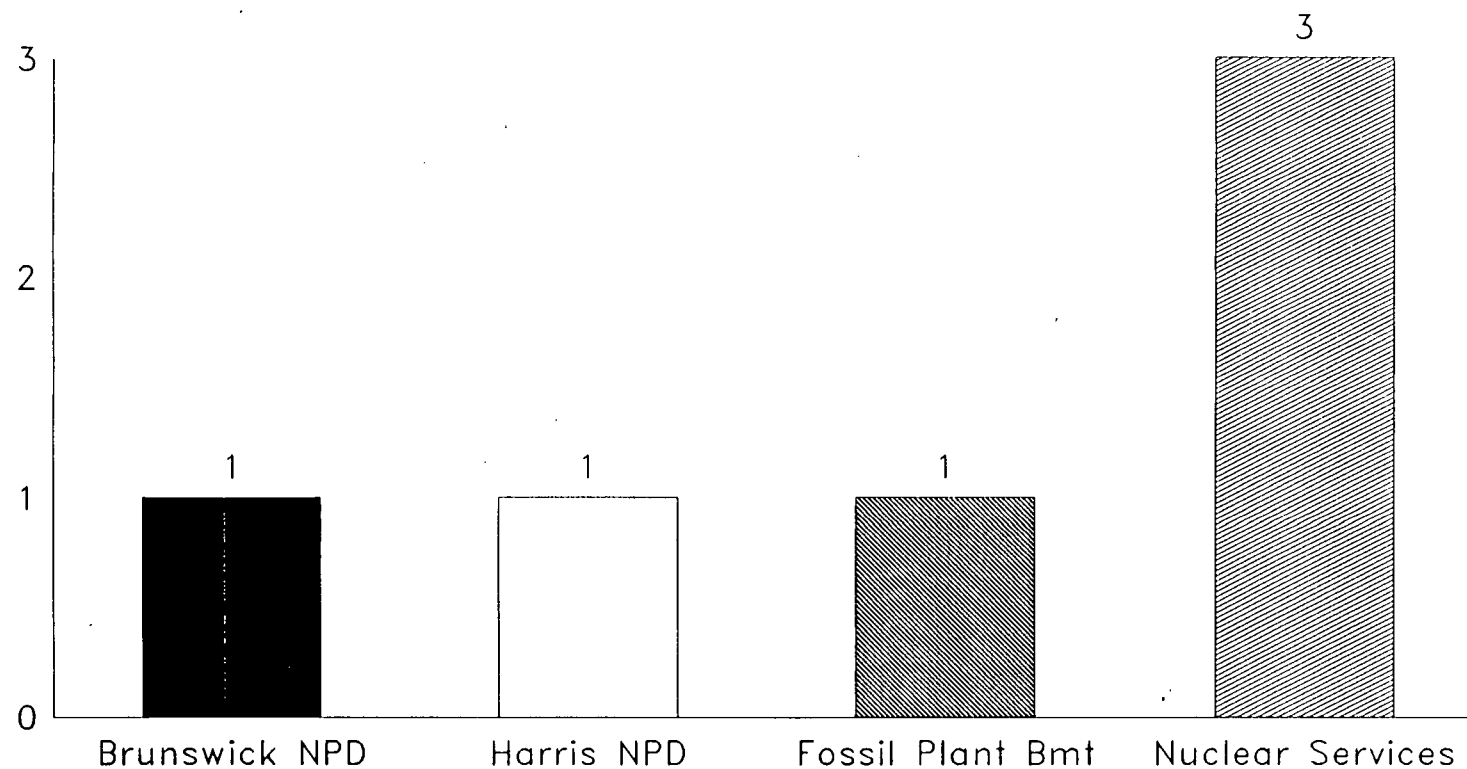


For January 1, 1991 - June 30, 1991  
6 employees + 17 contractors =  
23 violations

CHART #11

# CP&L Fitness for Duty Program

Department & Unit of Employee Violators



Unit

■ E&RC

▨ Maint-HBR/SHNP

□ QC

▩ Southern Area Maint

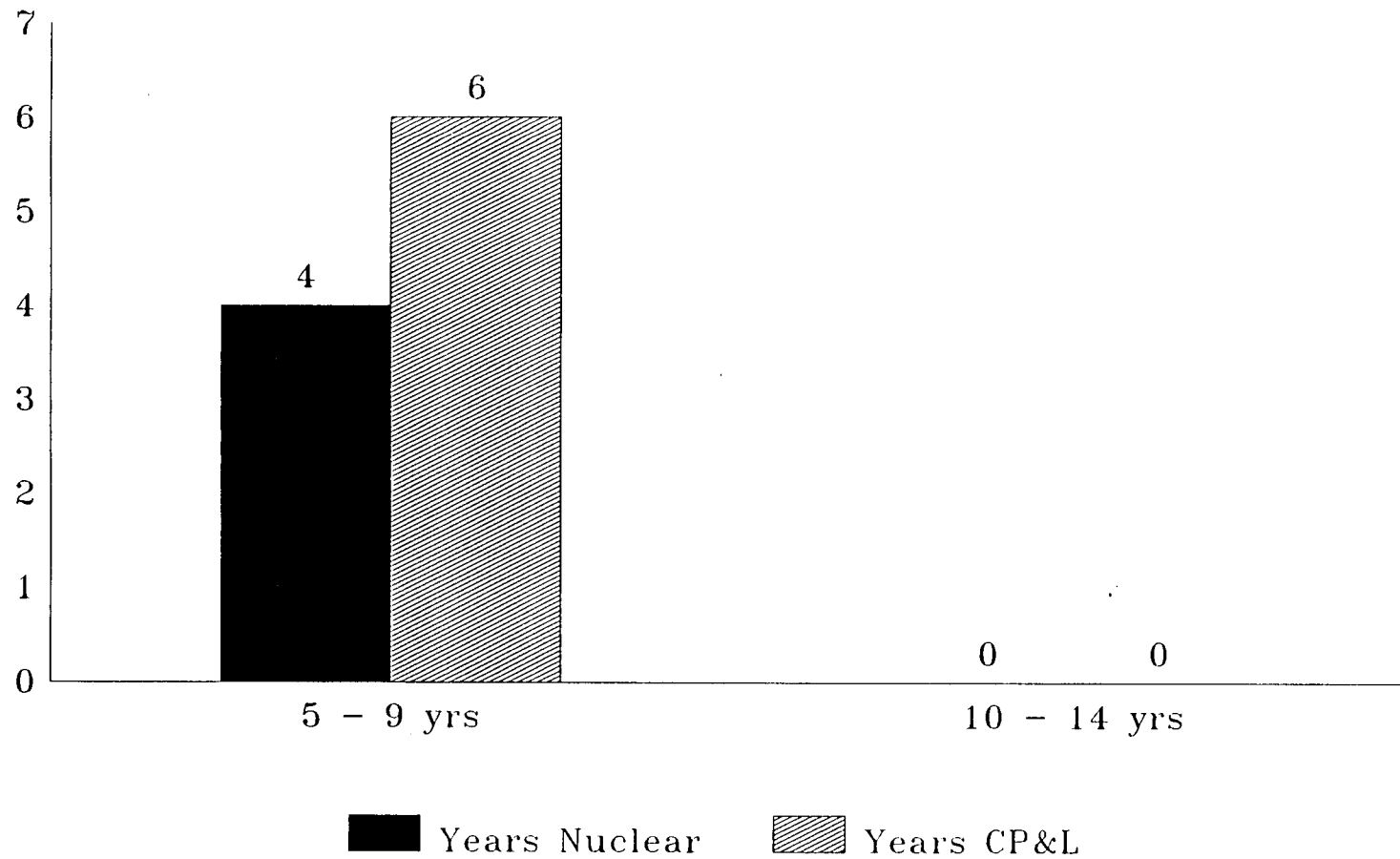
For January 1, 1991 - June 30, 1991

Total employee violators = 6

CHART #12

# CP&L Fitness for Duty Program

## Length of Service of Employees With Violations

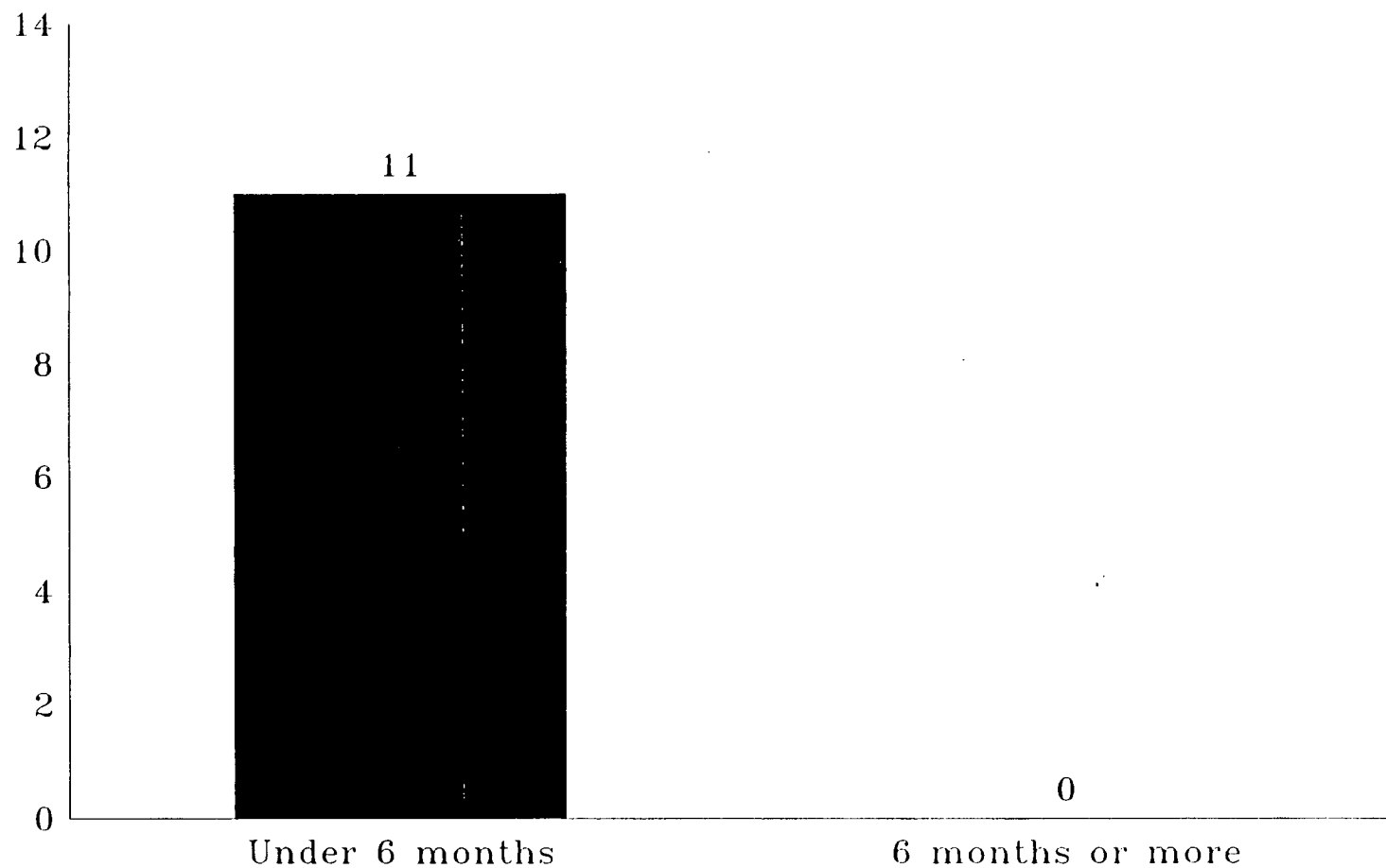


For January 1, 1991 - June 30, 1991  
6 employees

CHART #13

## CP&L Fitness for Duty Program

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

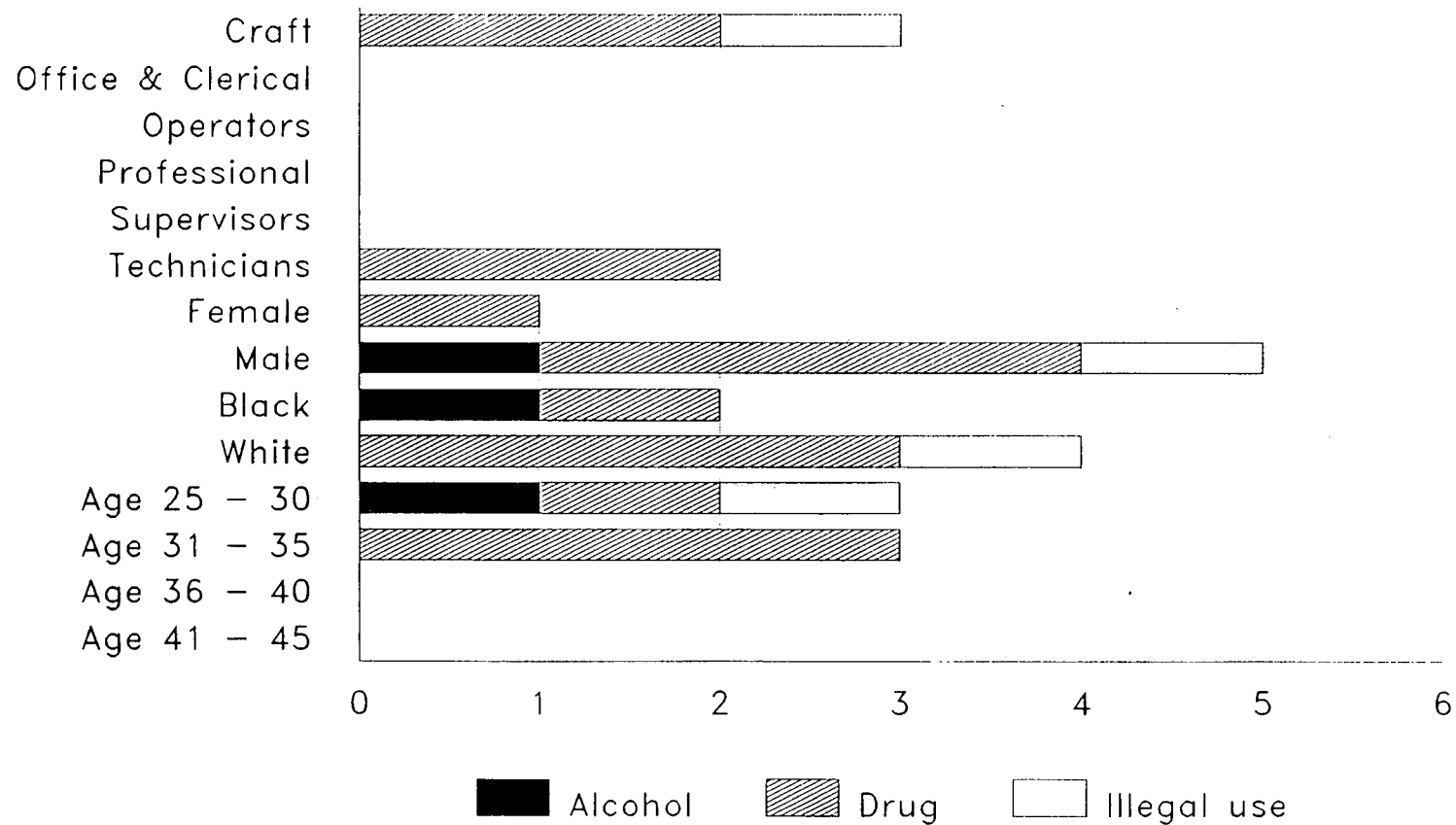


For January 1, 1991 - June 30, 1991  
11 contractors

CHART #14

## CP&L Fitness for Duty Program

Characteristics of Employees  
with Violations



For January 1, 1991 - June 30, 1991

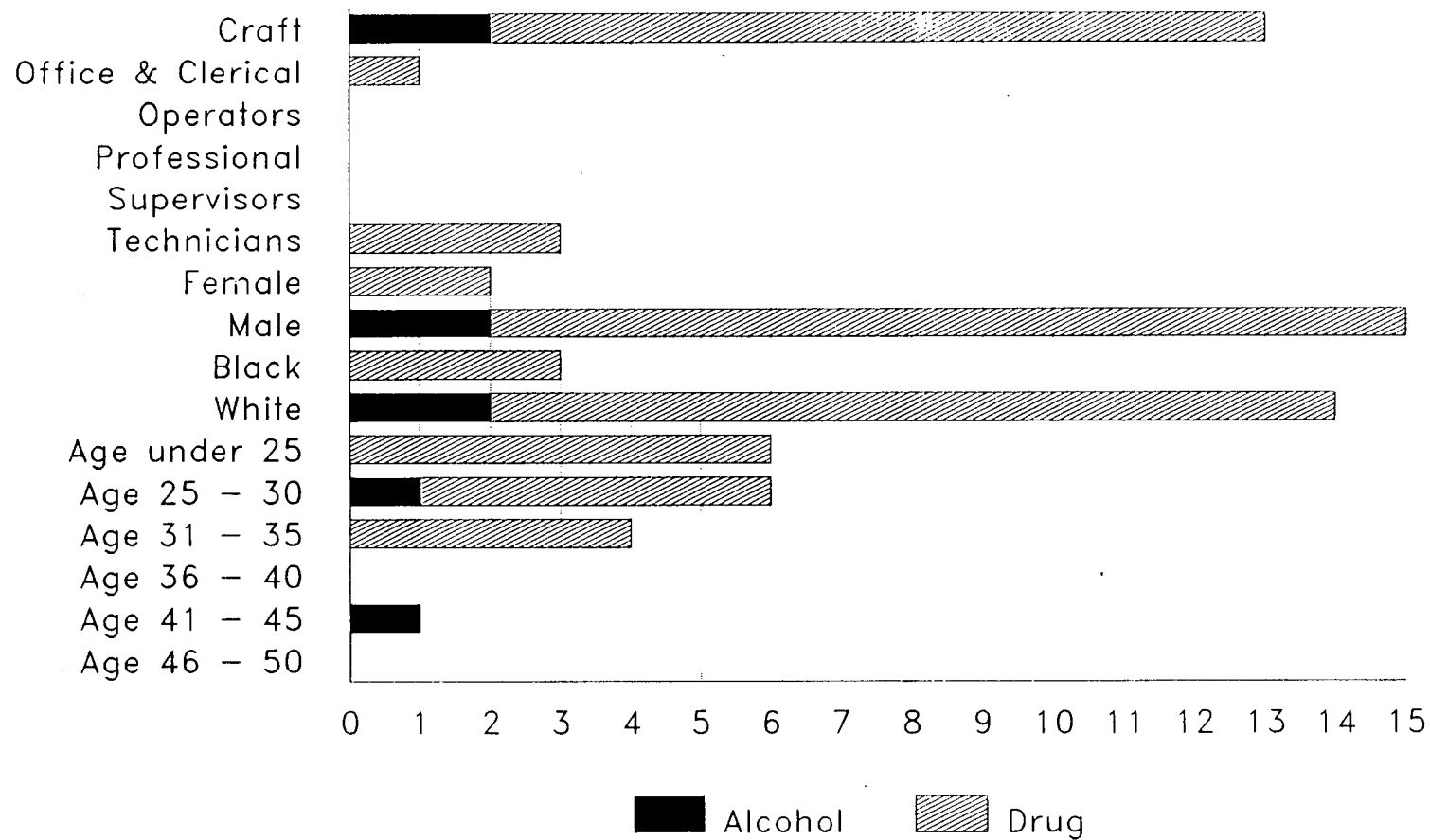
1 alcohol + 4 drug + 1 illegal use =  
6 violations



CHART #15

## CP&L Fitness for Duty Program

Characteristics of Contractors  
with Violations



For January 1, 1991 - June 30, 1991

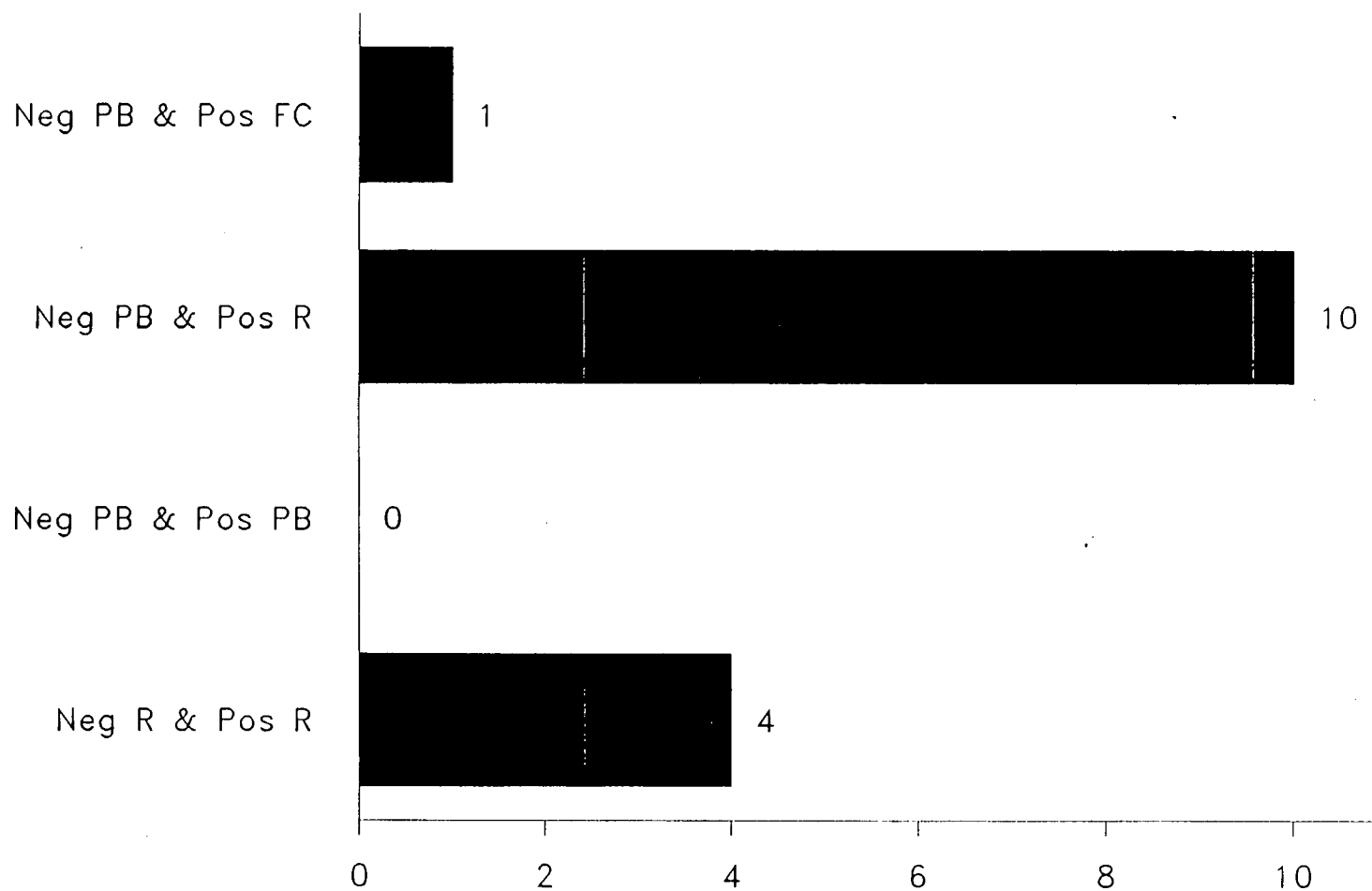
2 alcohol + 15 drug = 17 violations

CHART #16

## CP&L Fitness for Duty Program

Violations by Workers Previously Tested

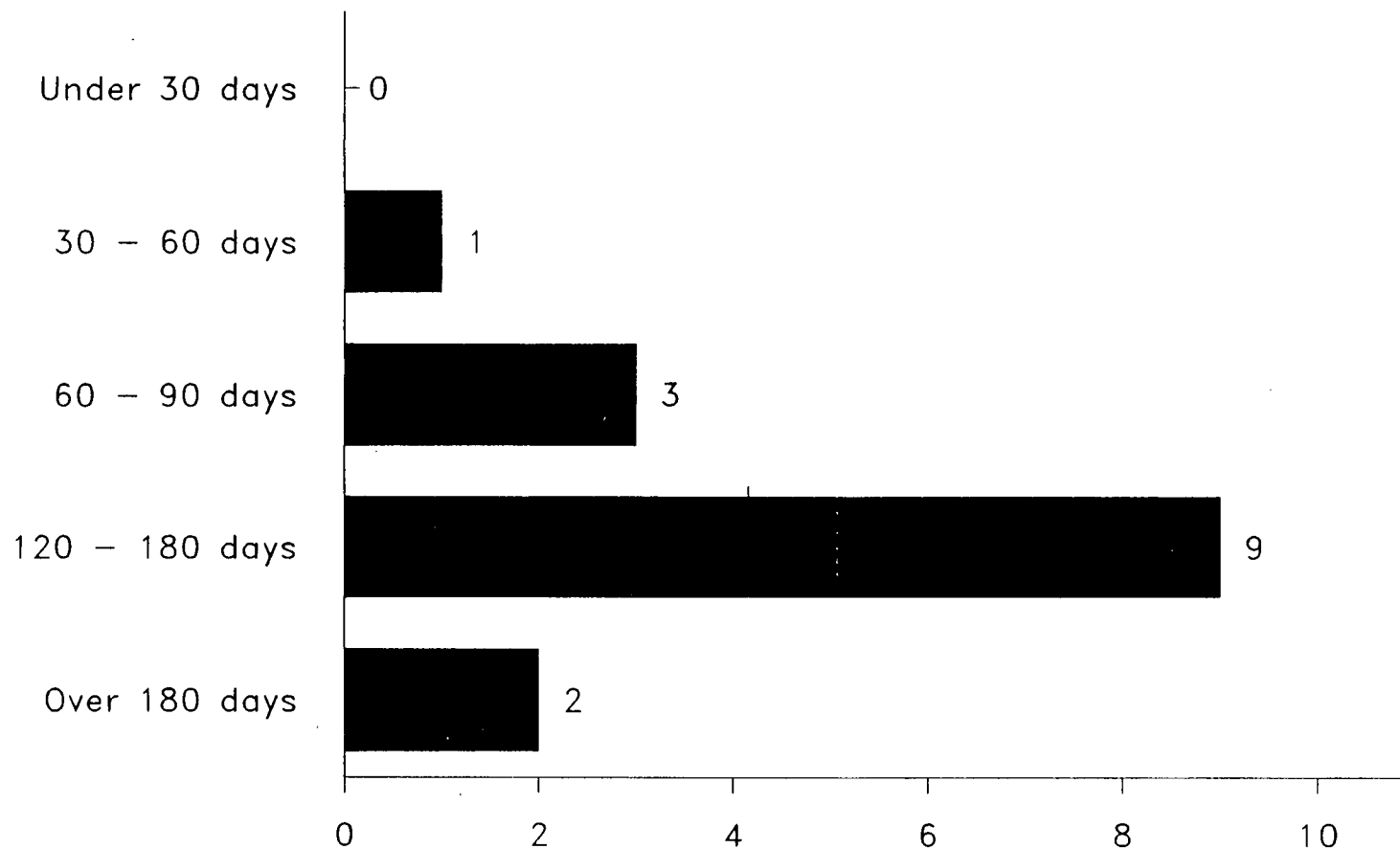
Types of First and Second Tests



For January 1, 1991 - June 30, 1991

# CP&L Fitness for Duty Program

Violations by Workers Previously Tested  
Days Between Negative & Positive Tests



For January 1, 1991 - June 30, 1991  
15 negative on 1st test, positive on 2nd  
Negative test may have been in 1990

CHART #18

## CP&L Fitness for Duty Program Random Testing Collection Time Data

- 78 tests on weekends
- 5 tests on holidays
- 2,339 tests during the regular shift
- 403 tests during the back shift

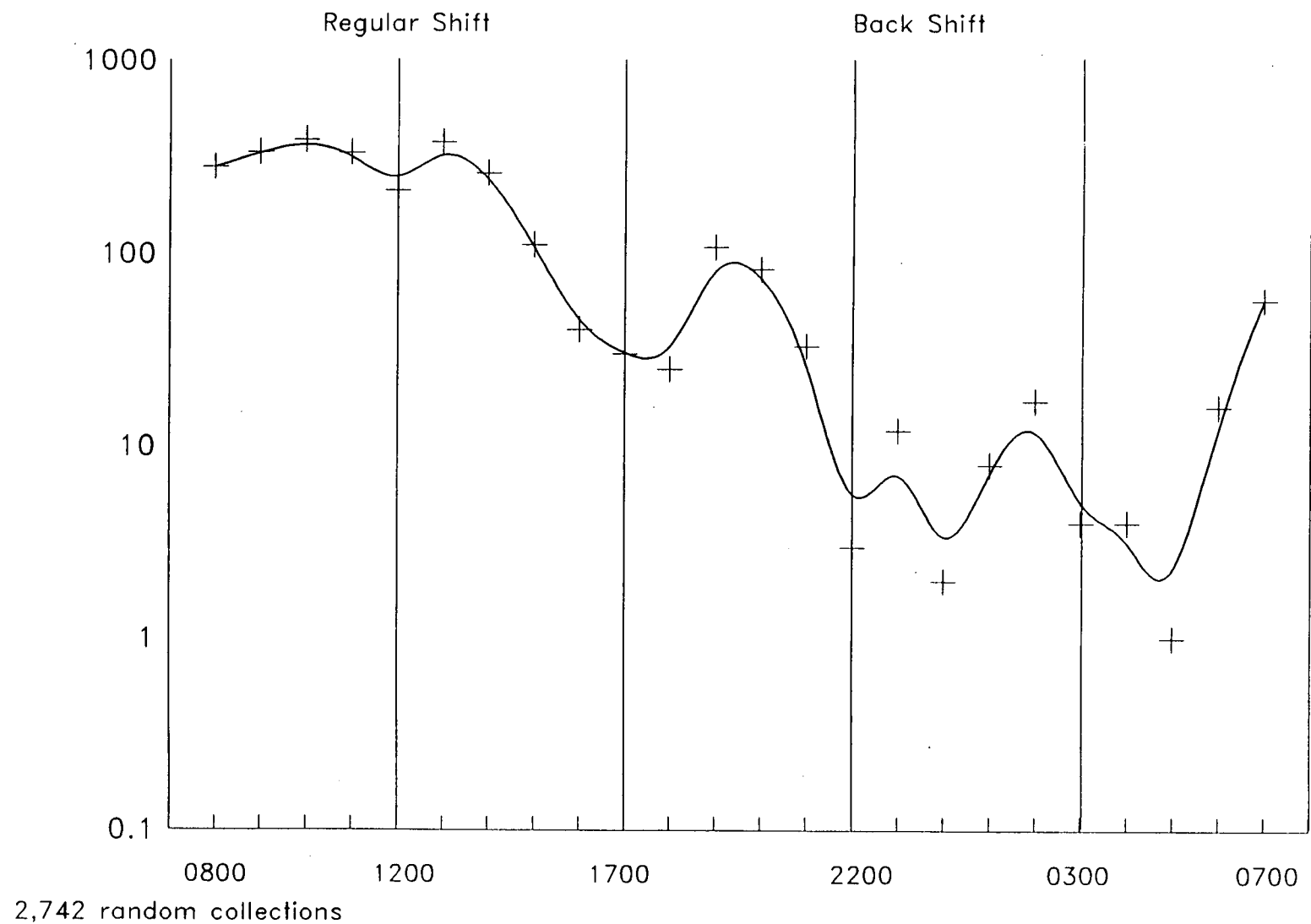
For System January 1, 1991 – June 30, 1991

CHART #19

# CP&L Fitness for Duty Program

System-Wide Random Test Times

January 1, 1991 - June 30, 1991



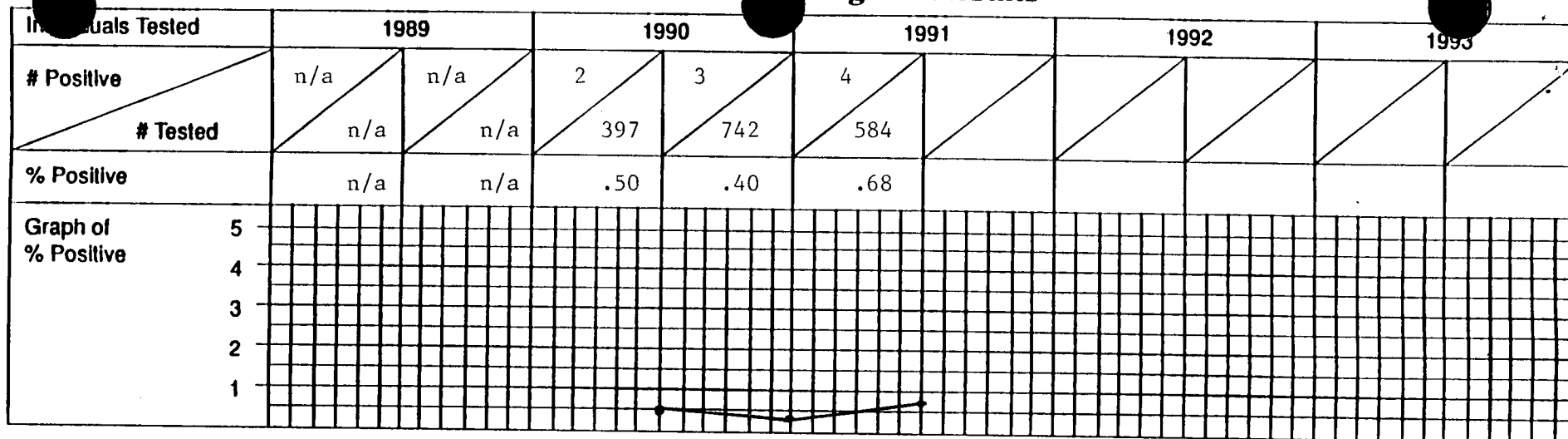
**Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR 26**

CAROLINA POWER & LIGHT COMPANY		January 1 - June 30, 1991	
Company		8 Months Ending	
Robinson Plant			
Location			
Greg Newsome		803-383-1207	
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	550				n/a		526	
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	50	0			n/a	n/a	n/a	n/a
Pre-badging	11	0			n/a	n/a	98	1
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	1	0			n/a	n/a	1	0
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	309	1			n/a	n/a	275	3
Follow-up	2	0			n/a	n/a	0	0
Other	0	1*			n/a	n/a	0	0
Total	373	2	2	1	n/a	n/a	374	4

\*Illegal use of legal drugs

## Random Test Program Results



### Confirmed Positive Tests for Specific Substances

[illegible]

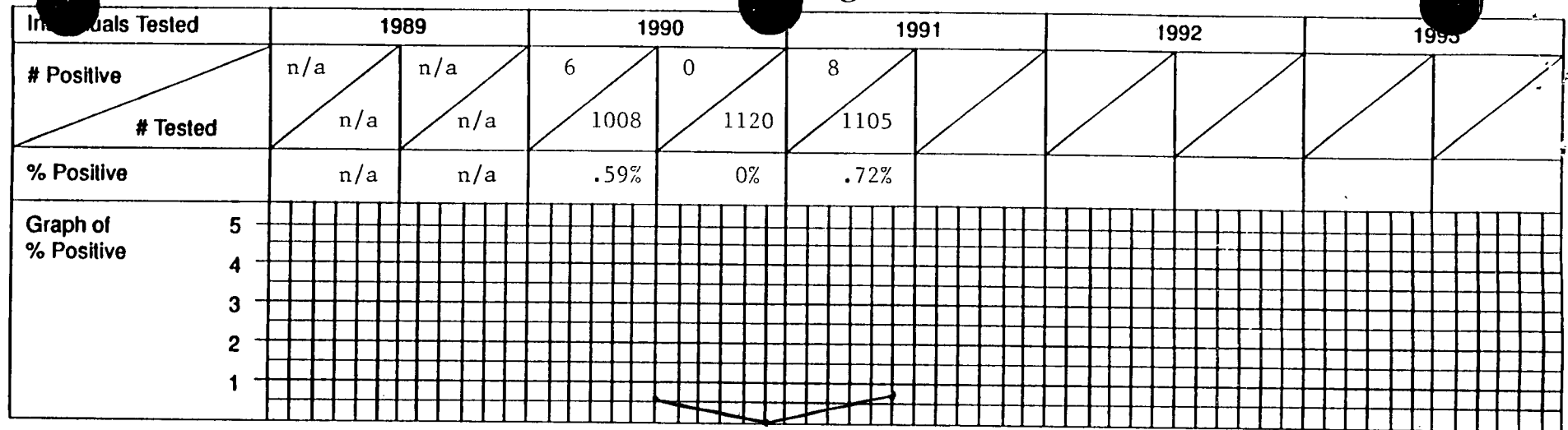
**Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR 26**

CAROLINA POWER & LIGHT COMPANY		January 1 - June 30, 1991
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	1029				n/a		871	
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	104	0			n/a	n/a	n/a	n/a
Pre-badging	9	0			n/a	n/a	198	0
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	0	0			n/a	n/a	2	0
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	595	2			n/a	n/a	510	6
Follow-up	3	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	711	2	2	0	n/a	n/a	710	6



## Random Test Program Results



### Confirmed Positive Tests for Specific Substances

[illegible]

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

CAROLINA POWER & LIGHT COMPANY		January 1 - June 30, 1991	
<b>Company</b>		<b>6 Months Ending</b>	
General Office			
<b>Location</b>			
Fred Underwood		919-546-6180	
<b>Contact Name</b>		<b>Phone (include area code)</b>	
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	462		#	#	n/a		0*	
Categories	# Tested	# Positive	Referred to EAP	Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	33	0			n/a	n/a	n/a	n/a
Pre-badging	31	0			n/a	n/a	53	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	210	0			n/a	n/a	71	0
Follow-up	0	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	274	0	0	0	n/a	n/a	124	0

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

## Random Testing Program Results

Individuals Tested	1989		1990		1991		1992		1993	
# Positive	n/a	n/a	0	0	0					
# Tested	n/a	n/a	237	234	281					
% Positive	n/a	n/a	0%	0%	0%					
Graph of % Positive	5									
	4									
	3									
	2									
	1									

## Confirmed Positive Tests for Specific Substances

Marijuana	n/a	n/a	0	0	0					
Cocaine	n/a	n/a	0	0	0					
Opiates	n/a	n/a	0	0	0					
Amphetamines	n/a	n/a	0	0	0					
Phencyclidine	n/a	n/a	0	0	0					
Alcohol	n/a	n/a	0	0	0					

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

CAROLINA POWER & LIGHT COMPANY		January 1 - June 30, 1991
Company		6 Months Ending
Harris Plant		
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	762				n/a		609	
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	38	0			n/a	n/a	n/a	n/a
Pre-badging	16	0			n/a	n/a	536	5
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	2	1			n/a	n/a	0	1*
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	442	1			n/a	n/a	318	1
Follow-up	1	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	499	2			n/a	n/a	854	7

\* One was refusal to participate in the specimen collection during BAC Test.

Individuals Tested		1989		1990		1991		1992		1993	
# Positive	n/a	n/a	3	2	2						
# Tested	n/a	n/a	687	697	760						
% Positive	n/a	n/a	.44	.28	.26						
Graph of % Positive	5										
	4										
	3										
	2										
	1										

### Confirmed Positive Tests for Specific Substances

[illegible]