



Carolina Power & Light Company

SERIAL: NLS-90-173  
10 CFR 26

AUG 30 1990

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 & 50-324/LICENSE NOS. DPR-71 & DPR-62

SEMIANNUAL 10 CFR 26 FITNESS FOR DUTY PROGRAM DATA


Gentlemen:

Pursuant to 10 CFR 26.71 (d), Carolina Power & Light Company (CP&L) hereby provides the required semiannual Fitness for Duty program performance data. CP&L fully implemented its Fitness for Duty program on January 3, 1990, as required by 10 CFR 26.

The attached 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 10 CFR 26. This report covers the period January 3, 1990 through June 30, 1990.

Please contact me at (919) 546-6242 if you require additional information concerning this report.

Yours very truly,



L. I. Loflin  
Manager  
Nuclear Licensing Section

JCP/ecc (794SNP)

00013

Attachments

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

Mr. R. Lo  
Mr. S. D. Ebnetter  
Mr. J. E. Tedrow

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

00000000 00000000  
FBI ADIC 05000261  
R FBI

MAH  
Add: MR/DRIS/RSG  
11/15/90

CAROLINA POWER & LIGHT COMPANY

FITNESS FOR DUTY PROGRAM  
(January 3, 1990 - June 30, 1990)

ATTACHMENT

**CAROLINA POWER & LIGHT COMPANY****Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)****SUMMARY OF MANAGEMENT ACTIONS**

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

- A number of fitness for duty program enhancements were made during the on-going assessment of the program during the reporting period. These management actions were:
  - a) A major re-write of the Corporate FFD Policies and Procedures was completed. The program document provides clearer direction to program administrators and to all supervisors.
  - b) The Corporate violation conference procedures were revised to more clearly reflect that communication with contractors about FFD violations should be through contract management to avoid co-employment issues.
  - c) The Corporate Suitable Inquiry procedure was revised to proceduralize obtaining this information for applicants in an effort to minimize errors and to expedite processing of these.
  - d) A Management decision was made to utilize alcohol breath instruments as screening devices for unscheduled work call outs in determining fitness for duty.
  - e) A review of the service provided by the courier and the HHS Laboratory as well as on-site EMIT testing was undertaken in an effort to minimize the turnaround time of test results.
  - f) In response to general concerns about the number of repeat tests, an information data sheet was prepared showing expected frequencies and restating the regulatory requirements which was then incorporated into the training materials and the policies and procedures.

## CAROLINA POWER & LIGHT COMPANY

### Fitness For Duty Program (January 3, 1990 - June 30, 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 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.

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

CAROLINA POWER & LIGHT COMPANY		Jan. 3 - June 30, 1990	
<small>Company</small>		<small>6 Months Ending</small>	
General Office - Raleigh, North Carolina			
<small>Location</small>			
Fred Underwood		919-546-6180	
<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	509				n/a		0 *	
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	13	0			n/a	n/a	n/a	n/a
Pre-badging	55	0			n/a	n/a	52	0
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	1	0			n/a	n/a	0	0
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	193	0			n/a	n/a	44	0
Follow-up	0	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	262	0	0	0	n/a	n/a	96	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	# Tested	n/a	n/a	0							
		n/a	n/a	237							
% Positive		n/a	n/a	0%							
Graph of % Positive	5										
	4										
	3										
	2										
	1										

## Confirmed Positive Tests for Specific Substances

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

**General Office  
Raleigh, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS  
EFFECTIVENESS EVALUATION**

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

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

**General Office  
Raleigh, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Lessons Learned or Trends**

- 1) Approximately 38% 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 year to date have tested 2,331 workers while the average number available for testing was 4,254 resulting in a year-to-date rate of 54.8%.
- 3) No conclusions can be drawn from the EAP utilization data based upon year-to-date information.
- 4) Availability for random testing year to date was 97.4%.



**General Office  
Raleigh, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Actions Taken to Enhance Program Effectiveness**

- 1) A formal survey by security personnel was conducted of the collection facility to assure appropriate security measures of the facility.
- 2) Local FFD Administrative procedures were revised to minimize the possibility of inadvertent errors in the discharge of these duties by the lack of detailed procedures for some functions.

**CAROLINA POWER & LIGHT COMPANY**

Attachment to NLS-90-173  
Page 8 of 30

**General Office  
Raleigh, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Events Reported by Telephone Under 10CFR 26.73**

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

**General Office  
Raleigh, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Actions Taken to Correct Program Weaknesses**

NONE

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

CAROLINA POWER & LIGHT COMPANY		Jan 3 - June 30, 1990	
<small>Company</small>		<small>6 Months Ending</small>	
Brunswick Plant, Southport, NC			
<small>Location</small>			
Vic Grose		919-457-2138	
<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	1008				n/a		772	
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	26	0			n/a	n/a	249	1
Periodic	n/a	n/a			n/a	n/a	n/a	n/a
For cause	2	0			n/a	n/a	0	0
Post accident	n/a	n/a			n/a	n/a	n/a	n/a
Random	643	3			n/a	n/a	365	3
Follow-up	0	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	2 *
Total	702	3	3	1	n/a	n/a	614	6

\* Refusal to participate in random testing.

## Random Testing Program Results

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

## Confirmed Positive Tests for Specific Substances (Includes pre-access)

Marijuana	n/a	n/a	3							
Cocaine	n/a	n/a	3							
Opiates	n/a	n/a	0							
Amphetamines	n/a	n/a	0							
Phencyclidine	n/a	n/a	0							
Alcohol	n/a	n/a	1							

**Brunswick 1 & 2  
Southport, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS  
EFFECTIVENESS EVALUATION**

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

INDICATORS	RESULTS
Number of finding drugs or alcohol on premises.	None
Number, types and quantity of drugs and alcohol found on premises.	None
Total number of confirmed positive drug tests (includes pre-access, random & for cause): a) Employee b) Contractor	a) Employees 2 b) Contractors 4 TOTAL 6
Total number of confirmed positive alcohol tests (includes pre-access, random & for cause): a) Employee b) Contractor	a) Employee 1 b) Contractor 0 TOTAL 1
Number of employee EAP self referrals;	a) Employee 13
Number of supervisor referrals of employees to EAP.	a) Employee 2
Number of for-cause impairment tests: a) Employee b) Contractor	a) Employee 2 b) Contractor -0- TOTAL 2
Refusal to participate in testing program: a) Employee b) Contractor	a) Employee -0- b) Contractor 2 TOTAL 2
FFD Appeals filed: a) Employee b) Contractor	a) Employee -0- b) Contractor -0-

**Brunswick 1 & 2  
Southport, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Lessons Learned or Trends**

- 1) Approximately 56.6% of the average number of workers with unescorted access were randomly tested resulting in six violations plus two refusals to participate. 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 corporate testing rate is 2% and year to date have tested 2,331 workers while the average number available for testing was 4,254 resulting in a year-to-date rate of 54.8%. At the Brunswick Plant, 1,008 workers have been randomly tested while 1,780 have been available for testing resulting in a year-to-date rate of 56.6%.
- 3) No conclusions can be drawn from the EAP utilization data based upon year-to-date information.
- 4) Availability for random testing year to date was 90%.
- 5) All employees in violation of the FFD Program were referred to the EAP. 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. Also, the Company does offer rehab for the first offense for a confirmed alcohol violation; therefore, of the three employees referred to the EAP, only one had their unescorted access reinstated. All contractors in violation of the FFD Program were permanently denied access. Contractors are not provided Company EAP services.

**Brunswick 1 & 2  
Southport, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Actions Taken to Enhance Program Effectiveness**

- 1) Initially, there were a large number of unavailable for testing because of infrequent access to the plant site. This was corrected by dropping the badge of the infrequent access person and requiring them to undergo pre-access testing before being re-granted access.
- 2) Early in the program a supervisor took a contract employee to the facility to be tested for alcohol (as a for cause). Personnel Relations was not notified of this. A breath analysis was performed but a urinalysis was not done causing this to be an incomplete test. As a result, management was informed of the error and facility personnel were instructed on how to handle these types of situations when they occur. This resulted in increased awareness of how to conduct a for-cause test by supervision. A change in policy also resulted in that a supervisor's concurrence instead of a Department Manager is required for a for-cause test. This expedites the approval process.
- 3) Other actions taken were as follows:
  - Enlarged collection facility
  - Insulated facility for sound for confidentiality
  - Added breathalyzer instrument for back-up as well as for increased screens during outages
  - Added buzzer on door to inform facility personnel of someone entering facility
  - Personnel Relations took over scheduling duties to ensure program needs are being met (i.e., weekends, holidays, nights, etc.)
  - Site purchased portable breathalyzers to demonstrate suitability for work for call-outs
  - Added exterior lights to facility to enhance security at night
  - Added ramp to accommodate handicapped individuals
  - Site management revised procedures
  - Four on-call personnel to assure FFD needs are met during off-duty hours



**Brunswick 1 & 2  
Southport, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Events Reported by Telephone Under 10CFR 26.73**

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

**Brunswick 1 & 2  
Southport, North Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Actions Taken to Correct Program Weaknesses**

NONE

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

CAROLINA POWER & LIGHT COMPANY		Jan 3 - June 30, 1990
<small>Company</small>		<small>6 Months Ending</small>
Harris Plant Area, New Hill, NC		
<small>Location</small>		
Steve Allen	919-362-2642	
<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	781				n/a		453	
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	36	0			n/a	n/a	78	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	472	2			n/a	n/a	215	1
Follow-up	0	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	541	2	2	0	n/a	n/a	293	1

**Harris Plant**  
**Fitness For Duty Program**  
**(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**  
**EFFECTIVENESS EVALUATION**

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

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

## Random Testing Program Results

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

## Confirmed Positive Tests for Specific Substances (INCLUDES PRE-ACCESS)

Marijuana	n/a	n/a	1							
Cocaine	n/a	n/a	1							
Opiates	n/a	n/a	0							
Amphetamines	n/a	n/a	0							
Phencyclidine	n/a	n/a	0							
Alcohol	n/a	n/a	1							

**Harris Plant  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Lessons Learned or Trends**

- 1) Approximately 55% of the average number of workers with unescorted access were randomly tested resulting in three violations, two employees and one contractor. All three of these individuals had previously been randomly tested with negative results. The conclusion is that these individuals were detected early in the random testing program and that the program is achieving it's goals and objectives.
- 2) CP&L has one pool from which its workers are selected for random testing. The weekly corporate testing rate is 2% and year to date have tested 2,331 workers while the average number available for testing was 4,254 resulting in a year-to-date rate of 54.8%. At the Harris Plant, 687 workers have been randomly tested while 1,234 have been available for testing resulting in a year-to-date rate of 55.6%.
- 3) No conclusions can be drawn from the EAP utilization data based upon year-to-date information.
- 4) Availability for random testing year to date was 84%.
- 5) All employees in violation of the FFD program were referred to the EAP. 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; therefore, none of these individuals were re-granted unescorted access. The alcohol violation by the contractor resulted in permanent denial of unescorted access of the contract worker. Contractors are not provided Company EAP services.

**Harris Plant  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Actions Taken to Enhance Program Effectiveness**

1) Actions taken as follows:

- Added breathalyzer instrument for back-up as well as increased screens during outages
- Site purchased portable breathalyzer to demonstrate suitability for work for call-outs
- Local FFD Administrative procedures were revised to minimize the possibility of inadvertent errors in the discharge of these duties by the lack of detailed procedures for some functions.

**Harris Plant  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Events Reported by Telephone Under 10CFR 26.73**

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



**Harris Plant  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Actions Taken to Correct Program Weaknesses**

NONE

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

CAROLINA POWER & LIGHT COMPANY		Jan 3 - Jun 30, 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	473		#	#	n/a		257	
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	37	0			n/a	n/a	n/a	n/a
Pre-badging	17	0			n/a	n/a	158	3
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	284	1			n/a	n/a	113	1
Follow-up	3	0			n/a	n/a	0	0
Other	0	0			n/a	n/a	0	0
Total	341	1	1	1	n/a	n/a	271	4

## Random Testing Program Results

Individuals Tested		1989		1990		1991		1992		1993	
# Positive		n/a	n/a	2							
# Tested		n/a	n/a	397							
% Positive		n/a	n/a	.50							
Graph of % Positive	5										
	4										
	3										
	2										
	1										

## Confirmed Positive Tests for Specific Substances (includes pre-access)

Marijuana	n/a	n/a	3							
Cocaine	n/a	n/a	1							
Opiates	n/a	n/a	0							
Amphetamines	n/a	n/a	0							
Phencyclidine	n/a	n/a	0							
Alcohol	n/a	n/a	1							

**H. B. Robinson #2**  
**Hartsville, South Carolina**  
**Fitness For Duty Program**  
**(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**  
**EFFECTIVENESS EVALUATION**

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

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

**H. B. Robinson #2  
Hartsville, South Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Lessons Learned or Trends**

- 1) Approximately 54.4% of the average number of workers with unescorted access were randomly tested resulting in two 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 from random testing. The Corporate weekly testing rate is 2% and year to date have tested 2,331 workers while the average number available for testing was 4,254 resulting in a year-to-date rate of 54.8%. At the Robinson Plant, 397 workers have been randomly tested while 730 have been available for testing resulting in a year-to-date rate of 54.4%.
- 3) No conclusions can be drawn from the EAP utilization data based upon year-to-date information.
- 4) Availability for random testing year to date was 92.4%.
- 5) All employees in violation of the FFD program were referred to the EAP. 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 rehab for the first offense by an employee of a confirmed alcohol violation; therefore, one employee had their access re-granted and the contractors who were in violation of the program had their access permanently denied. Contractors are not provided Company EAP services.

**H. B. Robinson #2  
Hartsville, South Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Actions Taken to Enhance Program Effectivenesses**

1) Actions taken as follows:

- Added breathalyzer instrument for back-up as well as increased screens during outages
- Local FFD Administrative procedures were revised to minimize the possibility of inadvertent errors in the discharge of these duties by the lack of detailed procedures for some functions.

**H. B. Robinson #2  
Hartsville, South Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Events Reported by Telephone Under 10CFR 26.73**

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

**H. B. Robinson #2  
Hartsville, South Carolina  
Fitness For Duty Program  
(January 3, 1990 - June 30, 1990)**

**SUMMARY OF MANAGEMENT ACTIONS**

**Actions Taken to Correct Program Weaknesses**

NONE