



10 CFR 26.719

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102-07079-MLL/DJH
July 21, 2015

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

Dear Sirs:

Subject: **Palo Verde Nuclear Generating Station (PVNGS)**
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Clerical Error on a Blind Performance Test Sample

Pursuant to 10 CFR 26.719(c)(1), Arizona Public Service Company (APS) hereby provides, as an enclosure to this letter, a report of an unanticipated result for a Fitness for Duty (FFD) blind performance test sample.

On June 19, 2015, members of the PVNGS Medical Review Officer staff received, from a Department of Health and Human Services (HHS) certified laboratory, a blind performance test result that was not consistent with the expected result.

APS completed an investigation of this issue on July 2, 2015, and determined the cause for the HHS certified laboratory unanticipated result was a clerical error. Results of the investigation are provided in the enclosure to this letter.

APS makes no commitments in this letter. If you have questions regarding this submittal, please contact Mark McGhee, Nuclear Regulatory Affairs Department Leader, at (623) 393-4972.

Sincerely,

MLL/DJH/akf

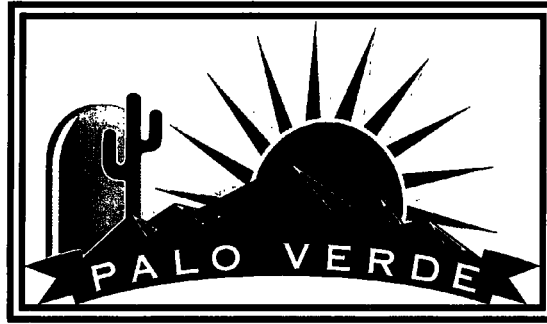
Enclosure 1: Summary of Investigation for Clerical Error by HHS Certified Laboratory

cc:	M. L. Dapas	NRC Region IV Regional Administrator
	M. M. Watford	NRC NRR Project Manager
	C. A. Peabody	NRC Senior Resident Inspector PVNGS

A022
MLL

ENCLOSURE 1

**Summary of Investigation for
Clerical Error by HHS Certified Laboratory**



SUMMARY OF INVESTIGATION FOR CLERICAL ERROR BY HHS CERTIFIED LABORATORY

Introduction

According to 10 CFR 26.168, licensees that engage Department of Health and Human Services (HHS) certified laboratories to perform fitness for duty (FFD) testing must submit blind performance test samples to the HHS certified laboratory as part of the quality control program. A blind sampling program involves intermingling blind test samples of known composition with the population of FFD samples routinely submitted to the laboratory. The blind test samples are not identified, and so are processed by the laboratory in the same manner as the routine FFD samples. The licensee is then able to test the validity of the laboratory's measurement process by comparing the laboratory's reported results with the expected results for the blind test samples. Palo Verde Nuclear Generating Station (PVNGS) uses FFD blind performance test samples that are prepared and provided by a commercial blind sample provider.

Summary of Event

On June 19, 2015, a PVNGS Medical Review Officer (MRO) staff / FFD member identified that an HHS laboratory report indicated a negative test result for a blind test sample that was expected to indicate positive. The laboratory was immediately contacted and questioned about the sample. The laboratory promptly confirmed that their actual test result was positive, but that a laboratory analyst had incorrectly entered the result into their data reporting program. The laboratory's certifying scientist had reviewed the report that was prepared for PVNGS, but had failed to identify the clerical error.

Reporting Requirements

Errors made in drug and alcohol testing are reportable under 10 CFR 26.719(c). Since no false reading of any sample occurred in this instance, this event is being reported under 10 CFR 26.719(c)(1) as an error in testing that requires notification within 30 days of completing an investigation. An investigation of this event was completed on July 2, 2015, and is documented in the PVNGS Corrective Action Program as Condition Report CR 15-03756.

Investigation

The HHS certified laboratory reviewed the entire batch in which this sample was included and verified that there were no other clerical errors. The PVNGS FFD staff identified that, in addition to this sample, ten other blind performance test samples were submitted to this laboratory during the second quarter of 2015. The reports for all ten were reviewed and confirmed to have been analyzed

and reported correctly by the laboratory. Procedures and policies at the laboratory and at PVNGS were reviewed for improvement opportunities.

Results / Conclusions

- No additional clerical errors in the reporting of blind performance test samples were identified in reports from the laboratory.
- The laboratory's certifying scientist failed to ensure the report was correct according to 10 CFR 26.169(a).

Corrective Actions

To address this issue, the following actions were taken:

- The clerical error was corrected by the laboratory and an updated report was provided to PVNGS.
- The laboratory provided re-training for the analyst and the certifying scientist. The re-training was verified and validated by the laboratory's Quality Assurance Officer.
- This event was entered into the PVNGS Corrective Action Program as Condition Report CR 15-03756 and an investigation was performed and completed on July 2, 2015.