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 for Jul-Dec 1993.

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February 23, 1994
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Docket No. 50-397

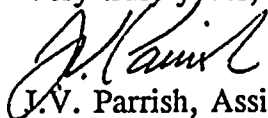
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: **WNP-2 OPERATING LICENSE NPF-21
FITNESS FOR DUTY SEMIANNUAL PERFORMANCE DATA REPORT
JULY 1 TO DECEMBER 31, 1993**

Pursuant to 10 CFR 26.71(d), enclosed is the Washington Public Power Supply System's Fitness for Duty Semiannual Performance Data Report for July 1 to December 31, 1993. The performance data has been compiled on forms similar to the standard forms developed by NUMARC. The data has been analyzed and indicates that for the calendar year 1993, 104% of the average population eligible for random selection was tested. Charts and graphs that summarize Program data are attached to the report.

Questions regarding the information in this report should be directed to S.R. Telander, Manager, Support Services, (509) 372-5650.

Very truly yours,



J.V. Parrish, Assistant Managing Director
Operations (Mail Drop 1023)

JVP:bd

Enclosure (1) Nuclear Plant 2, Fitness for Duty Program, Performance Data Report
for July 1 to December 31, 1993.

cc: Mr. R. J. Barr, NRC Resident Inspector/901A
Mr. K. E. Perkins, NRC - Region V
Mr. N. S. Reynolds, Winston and Strawn
Mr. R. J. Pate, NRC - Region V
Mr. L. Norderhaug, NRC - Region V
Mr. R. R. Assa, NRC
Mr. D. L. Williams - BPA/399

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

Washington Public Power Supply System, WNP-2	6 Months Ending: December 31, 1993
3000 George Washington Way	Richland, WA 99352
Contact Name: S.R. Telander	Phone: (509) 372-5650

[x] Appendix A to 10CFR26

Cutoffs:	Screen /	Confirmation		Screen /	Confirmation
Marijuana	100	15	Amphetamines	1000	500
Cocaine	300	150	Phencyclidine	25	25
Opiates	300	300	Alcohol (%BAC)	.04	
Others:					
Barbiturates	300	200	Benzodiazepines	300	200

Testing Results	Licensee Employees		Long-Term Contractors		Short Term Contractors	
Average # Unescorted Access:	1436		320		110	

Category	# Tested	# Positive	# Tested	# Positive	# Tested	#Positive
Pre- Access	233	0	32	0	70	1
Post- Accident	0	0	0	0	0	0
Observed Behavior	0	0	0	0	0	0
Random	767	0	105	0	32	0
Follow- Up	19	0	0	0	0	0
Other	0	0	0	0	0	0
Total	1019	0	137	0	102	1

Fitness for Duty
Performance Data
Personnel Subject to 10CFR 26
Page 2

Breakdown of Confirmed Positive Tests for Specific Substances:

	THC	Cocaine	Opiates	Amphe tamines	PCP	Alcohol	Refuse to Test
Licensee Employees	0	0	0	0	0	0	0
Long-Term Contractors	0	0	0	0	0	0	0
Short-Term Contractors	1	0	0	0	0	0	0
Total	1	0	0	0	0	0	0

	Barbiturates	Benzodiazepines			
Licensee Employees	0	0			
Long-Term Contractors	0	0			
Short-Term Contractors	0	0			
Total	0	0			

NUCLEAR PLANT NO. 2
PERFORMANCE DATA REPORT

July 1, 1993 to December 31, 1993

Introduction

As required by 10CFR26.71(d), Washington Public Power Supply System, Plant No. 2 is submitting the attached Fitness for Duty Performance Data Report for the second six month reporting period of 1993, July 1 to December 31. The data for this six month reporting period and the calendar year 1993 has been analyzed and management actions have been taken to enhance the program.

The Supply System continues to demonstrate that the Fitness for Duty Program is successful in working towards achieving a drug free workplace. During the calendar year 1993, the Supply System performed 1,942 random drug and alcohol tests. This represents a testing rate of 104% of the average population of 1,866 with unescorted access for 1993, which meets and exceeds the requirements of 10CFR26.

The incidence of confirmed positive random drug and alcohol tests during this reporting period of July 1 to December 31, 1993 is zero. The incidence of confirmed positive random drug and alcohol tests during the calendar year January 1 to December 31, 1993 is 0.15%

Program Result Analysis

Pre-Access

The Medical Review Officer (MRO) confirmed positive one chemical test result in the Pre-Access category for the six month period July 1 to December 31, 1993. The confirmed positive test result was a short term contractor. The result is as follows:

1 Pre-Access Positive Marijuana

During the same July to December reporting period in 1992 there was one Pre-Access positive test result for cocaine in a licensee applicant.

For Cause

There were no for cause drug or alcohol tests administered during this reporting period of July 1 to December 31, 1993. There were no drug or alcohol tests for cause administered during the calendar year 1993. To date, there have been no chemical tests administered for barbiturates or benzodiazepines.



Random

The Supply System randomly tested 904 individuals during the reporting period July 1 to December 31, 1993. The average population of those eligible for random selection during the reporting period was composed of 1,866 individuals. Of those 1,866, 1,436 were Supply System employees, 320 were long term contractors and 110 were short term contractors. Out of the 904 randomly tested during this reporting period, the MRO confirmed no test results positive. This resulted in a zero percent random positive rate for this reporting period.

Follow-Up

Under the follow-up testing program 19 drug and alcohol tests were administered during this reporting period. All test results were negative. The Supply System has seven licensee individuals participating in the follow-up program, based on results of positive chemical tests at the Supply System since January 1, 1990. There are no contractor employees participating in the follow-up program at this time.

Other

There were no drug or alcohol tests administered as a result of other causes during the 1993 calendar year.

Reportable Events

There were no 24 hour reportable Significant Fitness for Duty Events during the 1993 calendar year.

Blind Sample Program

During the 1993 calendar year, the Supply System submitted 58 blind sample specimens to the Substance Abuse and Mental Health Services Administration (SAMHSA) and HHS-certified laboratory for testing. This is 12.7% of the 455 samples submitted to SAMHSA and HHS-certified laboratories. This exceeds the Part 26, blind performance test specimen requirement of a minimum ten percent of the total number of samples submitted to the SAMHSA-certified laboratory per year. The Supply System included in the 58 blind sample specimens, six blinds spiked for barbiturates and benzodiazepines.

One performance test specimen for the benzodiazepine, oxazepam, was reported negative by the Supply System's HHS-certified laboratory. The HHS-certified laboratory detected the presence of oxazepam, however, it was below the cut-off level of 300 ng/ml. The occurrence was investigated and determined to be due to precipitation of the drug metabolite from the stock solution. This caused the solution used to prepare the samples to have a concentration lower than expected resulting in blind samples with lower than expected concentrations. Supply System practices were changed to allow the option of purchasing blind samples from a certified vendor to prevent reoccurrence of this problem.

Two performance test specimens were prepared by the Supply System's Environmental Laboratory as positive for THC. Both were reported THC positive by the HHS-certified laboratory but negative by the on-site EMIT laboratory when presented as a blind performance tests. After a thorough investigation the discrepancy can be readily explained in two ways.

First, cannabinoids are hydrophobic molecules subject to absorption to solid surfaces from aqueous solutions such as urine. The degree of absorption is dependent upon surface to volume ratio, the type of surface and handling techniques. Supply System procedure required the transferring a one milliliter (ml) aliquot from the original specimen container to a 15 ml Falcon container and transfer to the EMIT laboratory. Absorption loss onto the plastic vessel can be minimized by filling the 15 ml transport tubes to the maximum level. The procedure was revised to allow the excess volume collected to be transferred to the Falcon container.

Second, much of the THC metabolite used to spike the samples was in the wrong isomeric form for detection by EMIT and is never found naturally in human urine. After discussion with the SYVA Technical Consultation Center, it was revealed that one of the reagents utilized in the EMIT screen reacts specifically with only the L-isomers of the THC molecule and only weakly or not at all with the D-isomers of the molecule. This is because the natural form of the THC molecule which occurs in human metabolism is the L-isomer, and SYVA uses only this isomer to produce the antibodies. Thus, if a standard or control sample is prepared with anything other than the L-isomer, reduced EMIT rates will be exhibited by the system toward the analyte. The reagent used to prepare the blind samples was purchased from SIGMA Chemical Co. We requested a certificate of analysis from Sigma which revealed no information as to optical rotations. Discussions with Sigma technical personnel have confirmed that the material is a racemic mixture of unknown ratio between the D and L-isomers. The confirmatory method GC/MS, does not discriminate between the D and L-isomers, and thus an analysis of the sample by GC/MS will not reveal any of the discrepancies exhibited by the EMIT system due to optical isomerism of the analyte. Sigma has indicated that they will update their product description immediately to reflect the true isomeric character of its product in future lots.

Performance Summary for 1993

Chart Summary:

- Chart 1, Random Pool / Employee Type. This chart shows the total population in each of the reporting categories making up the random test pool administered by the Fitness for Duty Program from July 1 to December 31, 1993.
- Chart 2, Chemical Tests by Type. This chart shows the breakdown of drug and alcohol tests by category for the July 1 to December 31, 1993 reporting period. In this report, the categories Pre-employment and Pre-Badging were combined to make up the category Pre-Access.
- Chart 3, Tests by Type. This chart shows the breakdown of drug and alcohol tests by category for the calendar year January 1 to December 31, 1993.
- Chart 4, FFD Off Shift & Weekend Testing 1993. This chart shows that 13% of the FFD Chemical testing program was administered during off shifts.

Graph Summary:

- Graph 1, Random Test Failures. This graph shows that the total number of random test failures during the July to December reporting periods has declined from 4 in 1991, to 2 in 1992, to zero in the current reporting period.
- Graph 2, 1993 MRO Confirmed Positive Tests, Pre-Access, Random and Follow-Up. This graph shows the overall confirmed positive chemical test results by employee type. All contractor positives were pre-access test results for short term contractors.
- Graph 3, Percent of Individuals Per Times Selected, Available for all 281 runs (January 1, 1990 to December 31, 1993). This graph shows that the percentage of participants selected 0 times and available for all 281 random runs has declined to 1.1% as of December 31, 1993.

Conclusion

The Supply System continues to demonstrate that the Fitness for Duty Program is successful toward our goal of achieving a drug-free workplace.

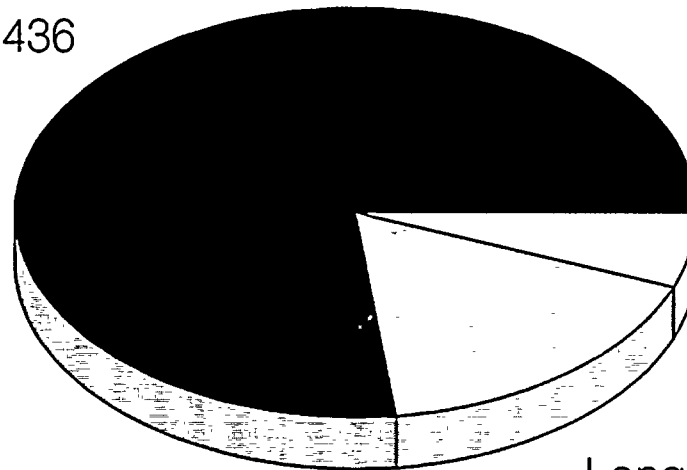


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Supply System FFD Program

Random Pool / Employee Type

Licensee 1436



Short-Term Contract. 110

Long-Term Contract. 320

Chart 1
July 1 to December 31, 1993

Supply System FFD Program

Chemical Tests By Type

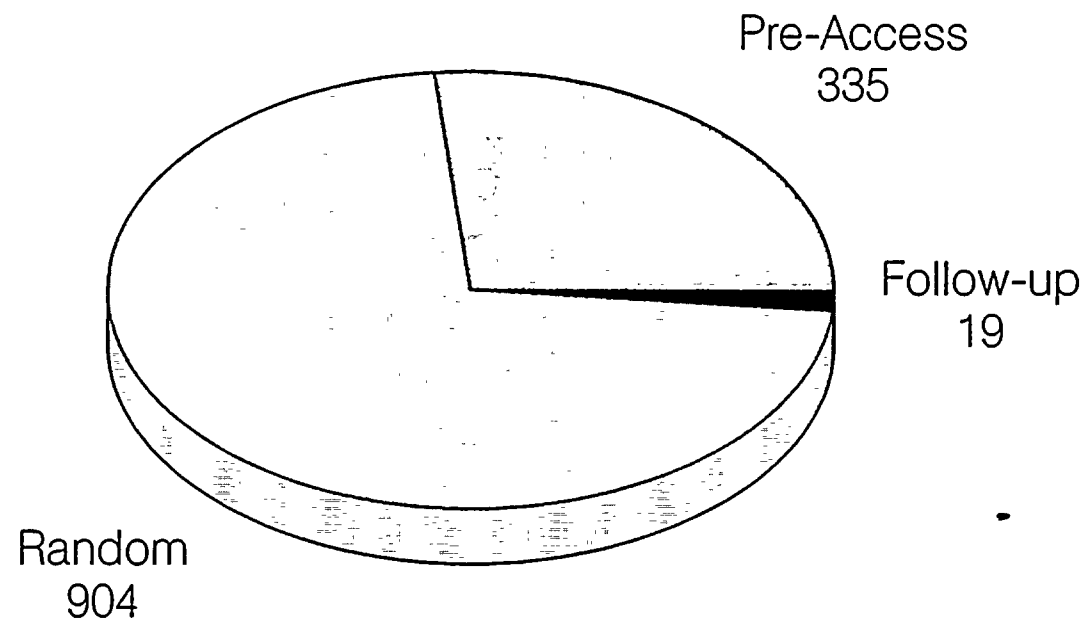


Chart 2
July 1 to December 31, 1993

Supply System FFD Program

Tests By Type for 1993

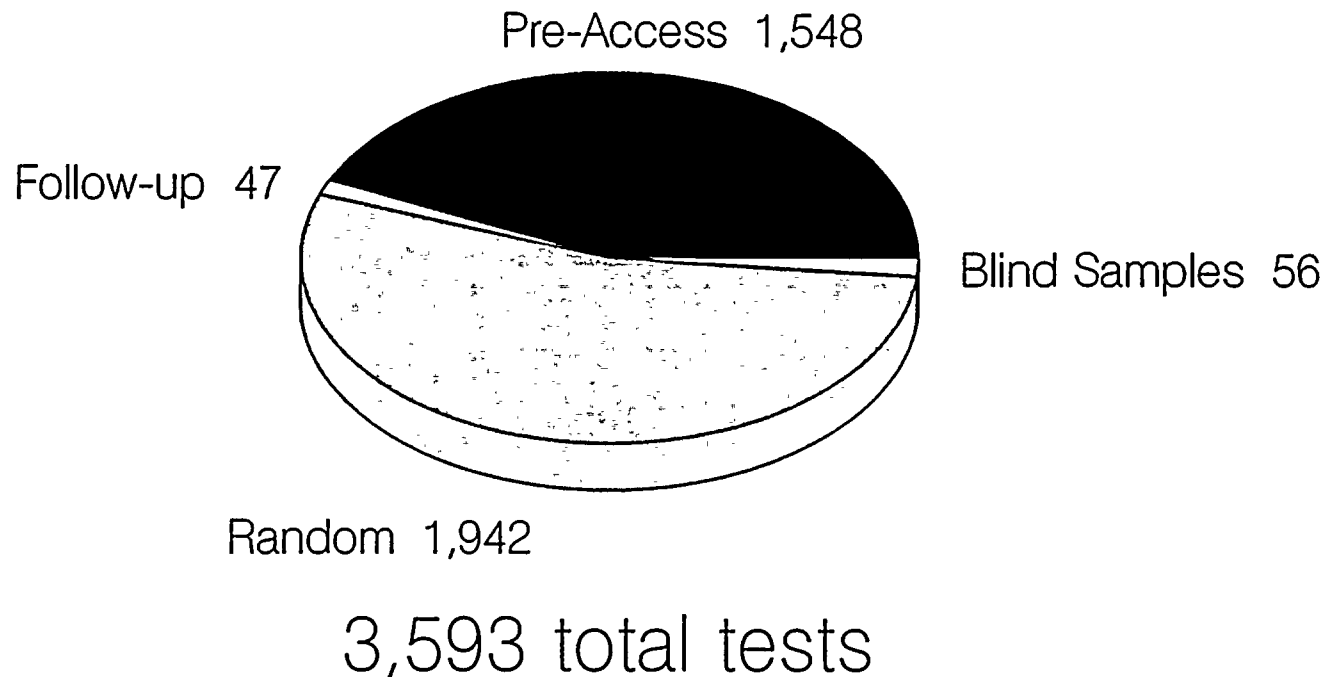


Chart 3
January 1 to December 31, 1993



100

100

100

4

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

FFD Off Shift and Weekend Testing

January 1 to December 31, 1993

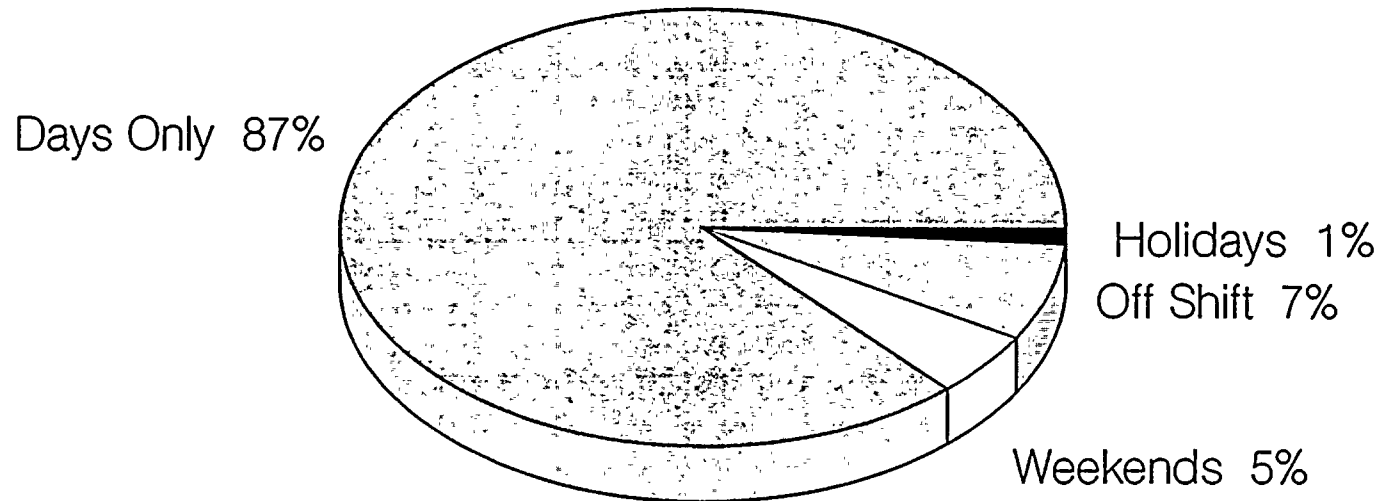


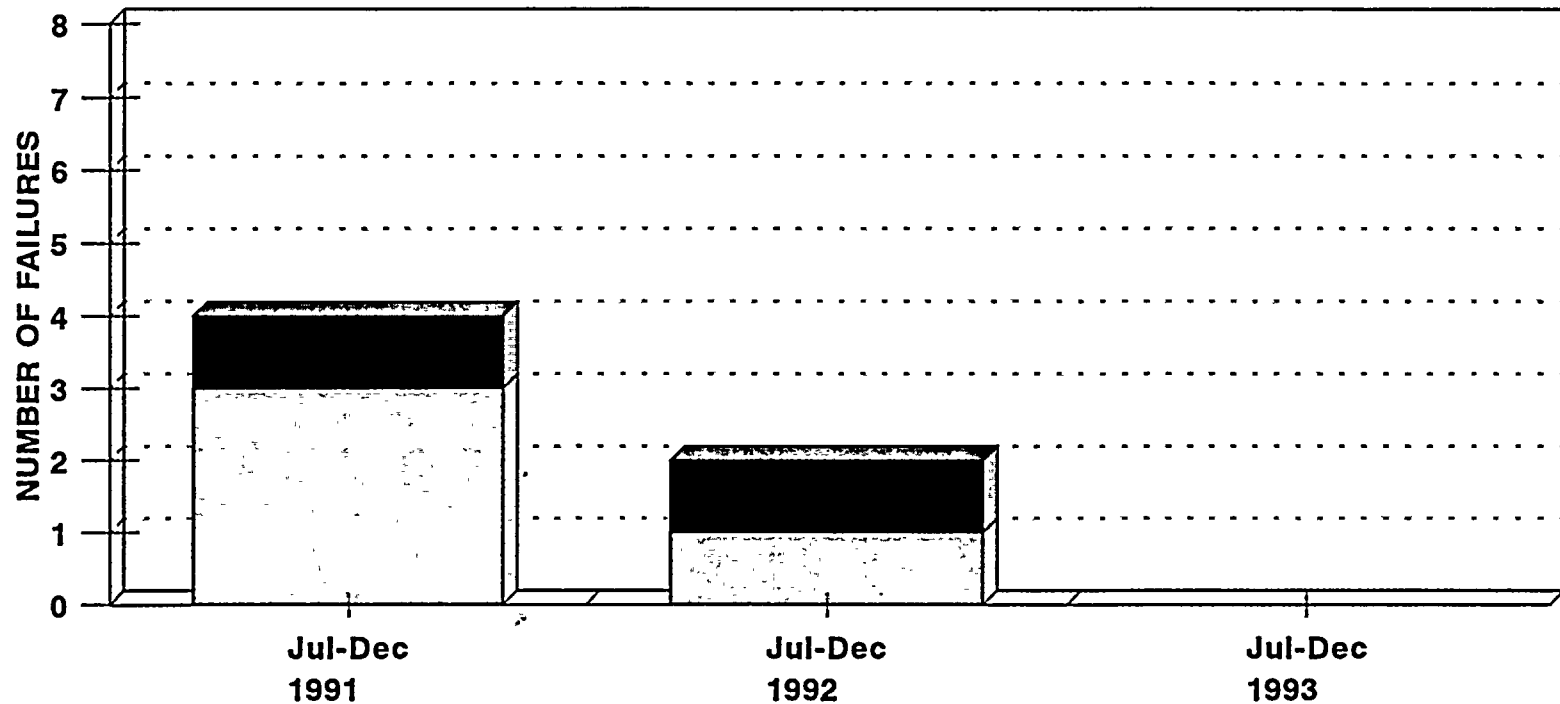
Chart 4
January 1 to December 31, 1993



Random Test Failures

July to December Reporting Periods

1991, 1992 & 1993



PCP	0	0	0
Amphetamines	0	0	0
Marijuana	1	1	0
Cocaine	3	1	0
Alcohol	0	0	0

REPORTING PERIOD

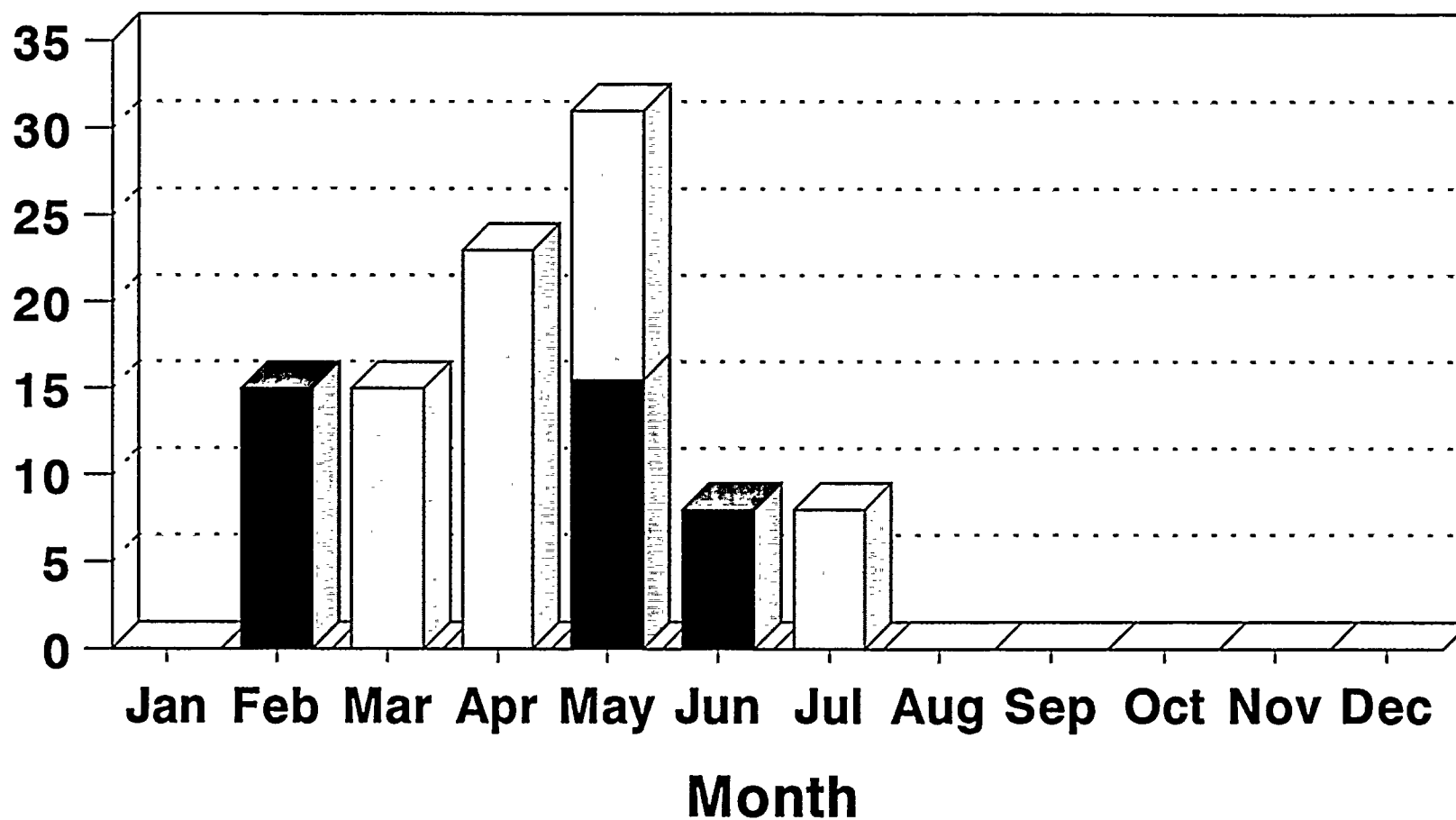
Graph 1

MRO Total Confirmed Positives

By Employee Type

January 1 to December 31, 1993

% Tested Positive of 13 Confirmations



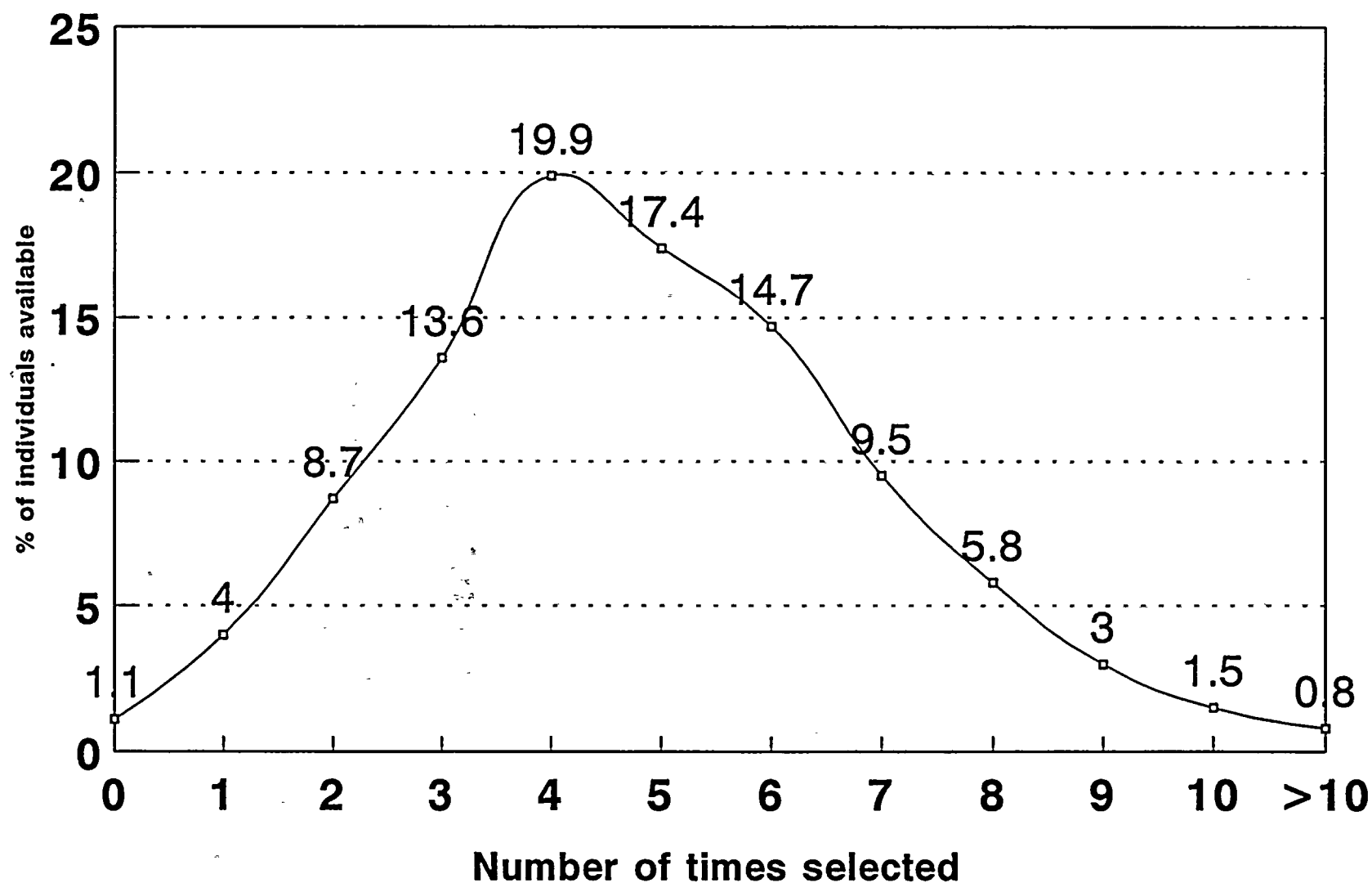
■ Licensee Employee □ Long Term Contract □ Short Term Contract

Graph 2

Percent/Individuals Per Random Selection

(Available for all 281 runs)

January 1, 1990 to December 31, 1993



Graph 3

Appeals

During this reporting period no individual appealed their test determinations.

Program Review

In November 1993 a Quality Assurance Audit was conducted by a Supply System audit team. Henning F. Proelss, Ph.D, a Consulting Clinical Chemical /Toxicologist was contracted to provide technical guidance during the audit. The results of the audit show the overall FFD program, as implemented by the Supply System at WNP-2, to be well designed and executed. It was judged to be very effective and meets or exceeds 10 CFR 26 requirements. The program is effective in creating a work environment which is free of drugs and the effects of such substances. Many of the recommendations made during the audit were incorporated into the program.

Five individuals having emergency response responsibilities at the EOF and TSC, were inadvertently removed from the random selection pool. The five individuals were reactivated in the FFD random test data base. Processes have been implemented to verify that only intended changes have been made to the FFD random test data base.

Program Changes

The following are changes that have been made to the Fitness for Duty Program in an effort to improve the overall effectiveness of the program:

- The contract for collection technician services was modified allowing the collection technicians to be added to the random testing pool.
- A process has been implemented to verify that only intended changes have been made to the FFD random test data base.
- Procedures for the off-site urine collection facility were enhanced. This facility is used for collection of specimens provided by FFD staff and contracted collection technicians.
- The MRO has expanded his documentation record to include notation of laboratory report review, approval and a detailed memorandum of clinical interview when declaring laboratory positive results, negative.
- Supply System practices were changed to purchase blind samples from a certified vendor.