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 for Jul-Dec 1994.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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February 16, 1995
GO2-95-035

Docket No. 50-397

U. S. Nuclear Regulatory Commission
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Subject: **WNP-2 OPERATING LICENSE NPF-21
FITNESS FOR DUTY SEMIANNUAL PERFORMANCE DATA REPORT
JULY 1, 1994, TO DECEMBER 31, 1994**

Reference: NRC Administrative Letter 94-09, "Changes to the Mandatory Guidelines for Federal Work Place Drug Testing Programs", August 4, 1994

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, 1994 to December 31, 1994. The data has been compiled and analyzed and management actions have been taken to enhance the Fitness for Duty program. Charts and graphs that summarize program data are attached to the report.

Consistent with the reference, the Supply System is lowering the cut-off level for marijuana metabolites from 100 ng/ml to 50 ng/ml. This proactive change is made in anticipation of a future change to 10 CFR 25 and to facilitate laboratory testing, since quality control standards are no longer being manufactured at the 100 ng/ml level. The Supply System expects to make this change in March 1995 to support pre-access testing for the Spring 1995 refueling outage. This letter serves as the required NRC notification within 60 days of implementation per 10 CFR 26, Appendix A.

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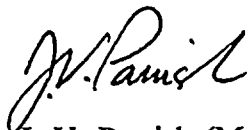
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**FITNESS FOR DUTY SEMIANNUAL PERFORMANCE DATA REPORT
JULY 1, 1994, TO DECEMBER 31, 1994**

Should you have any questions or desire additional information regarding this matter, please call me or D. W. Martin, manager, Security Programs at (509) 377-8628.

Sincerely,



J. V. Parrish (Mail Drop 1023)
Vice-President, Nuclear Operations

/sd

Attachment: (1) Fitness for Duty Program, Performance Data Report for July 1, 1994, to December 31, 1994

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

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

Washington Public Power Supply System, WNP-2	6 Months Ending: December 31, 1994
3000 George Washington Way	Richland, WA 99352
Contact Name: D.W. Martin	Phone: (509) 377-8628

[x] Appendix A to 10CFR26

<u>Cutoffs:</u>	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:	1510	164	97

Category	# Tested	# Positive	# Tested	# Positive	# Tested	#Positive
Pre-Access	142	1	61	1	22	0
Post-Accident	0	0	0	0	0	0
Observed Behavior	2	0	0	0	0	0
Random	374	1	38	0	16	0
Follow-Up	29	0	0	0	0	0
Other	0	0	0	0	0	0
Total	547	2	99	1	38	0

Breakdown of Confirmed Positive Tests for Specific Substances:

	THC	Cocaine	Opiates	Amphe tamines	PCP	Alcohol	Refuse to Test
Licensee Employees	1	1	0	0	0	0	0
Long-Term Contractors	0	0	0	1	0	0	0
Short-Term Contractors	0	0	0	0	0	0	0
Total	1	1	0	1	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, 1994 to December 31, 1994

Introduction

As required by 10 CFR 26.71(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 1994, July 1 to December 31. The data for this six month reporting period and the calendar year 1994 has been analyzed and management actions have been taken to enhance the program. Blind performance test specimens were submitted to contracted HHS-certified laboratories and the on-site testing facility consistent with the requirements of 10 CFR 26. All laboratory results were within the anticipated ranges. In addition to the blind performance test specimens, a sampling of specimens screened as negative from every test run by the on-site testing facility were submitted to the HHS-certified laboratory. All laboratory results were within anticipated ranges supporting the immunoassay technology utilized by the Fitness for Duty 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 1994, the Supply System performed 1,038 random drug and alcohol tests. This represents a testing rate of 53.3% of the average population of 1,947 with unescorted access for 1994, which meets and exceeds the requirements of 10 CFR 26.

The incidence of confirmed positive random drug and alcohol tests during this reporting period of July 1 to December 31, 1994 is 0.23%. The incidence of confirmed positive random drug and alcohol tests during the calendar year January 1 to December 31, 1994 is 0.28%.

Program Result Analysis

Pre-Access

The Medical Review Officer (MRO) confirmed positive two (2), drug test results in the Pre-Access test category for the six month period July 1 to December 31, 1994. One confirmed positive test result was a Supply System applicant for access. The second confirmed positive test result was a long term contractor applying for access due to a change in employer through a new contract award. This second confirmation included the MRO's verification of tampering during the clinical interview. The individual substituted a negative sample he had brought to the collection facility for the first collection. A low temperature reading and subsequent observed collection resulted in the confirmed positive test result. Of the two confirmed positive results, one was positive for cocaine and the other positive was amphetamines.

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During the same July to December reporting period in 1993 there was one Pre-Access positive test result for marijuana in a short term contractor applicant.

Observed Behavior / For Cause

There were two drug/alcohol tests administered for observed behavior/for cause, during this reporting period of July 1 to December 31, 1994. The causes included behavioral observations and changes in performance, failure to follow procedures and stress. The first involved an incident that involved failure to follow HP monitoring procedures on entering the RadWaste Control Room. The second case involved observed behavior over a six month period, increased level of stress and finally, a vehicular accident off-site leading to the supervisor's concern for the individuals reliability and/or ability to function. Both individuals are Supply System employees. The two chemical tests administered included testing for an expanded panel of the NIDA-5, plus barbiturates and benzodiazepines. The two drug and alcohol test produced negative results. To date, there have been no positive results for barbiturates or benzodiazepines.

During the same July 1 to December 31 reporting period for 1993, there were no drug/alcohol tests administered for observable behavior/for cause.

Random

The Supply System randomly tested 428 individuals during the reporting period July 1 to December 31, 1994. The average population of those eligible for random selection during the reporting period was composed of 1,771 individuals. Of those 1,771, 1,510 were Supply System employees, 164 were long term contractors and 97 were short term contractors. Out of the 428 randomly tested during this reporting period, the MRO confirmed one random test result positive for marijuana. The individual was a Supply System employee who was denied access to the Protected Area of WNP-2 for fourteen days and referred to the EAP for assistance. Following treatment he returned to work, regained access and is currently participating in the follow-up program. The one positive random test in 428 random tests results in a 0.23 percent random positive rate for this reporting period.

Follow-Up

Under the follow-up testing program 29 drug/alcohol tests were administered during this reporting period. All test results were negative. The Supply System had ten licensee individuals participating in the follow-up program, based on results of positive chemical tests at the Supply System since January 1, 1990. One individual completed his follow-up program in October, leaving nine employees currently participating in the follow-up program. There are no contractor employees participating in the follow-up program at this time.

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Other

There were 17 drug/alcohol tests administered in the other category during the 1994 calendar year. These tests were reported during the January to June 1994 reporting period. These 17 individuals were assigned to EOF responder duties but not required to have unescorted access. They were tested as a result of the 10 CFR 26.2(a) requirement to test persons required to physically report to the EOF in accordance with licensee emergency plans and procedures. There were no tests in this category for this July to December 1994 reporting period.

Reportable Events

No licensed operators or supervisors have tested positive, nor were there any incidents of sale, use or possession of illegal substances in the Protected Area. There were no 24 hour reportable Significant Fitness for Duty Events during the 1994 calendar year.

Appeals

During this reporting period no individual appealed their test determinations.

Program Review

Responding to an incident that occurred during the Spring Outage, on August 16, 1994 Supply System Security and Fitness for Duty conducted a Time-Out to review the lessons learned from what was at first a minor prank that then turned into a serious incident. It involved two employees who decided to play a trick on another employee using ski masks and an electric cart in the Protected Area. They were encountered by security personnel who had them remove the ski masks. The incident received considerable attention from external sources including the media. The Time-Out provided information to clarify the requirements and relationships regarding the Fitness for Duty Program and Continued Behavior Observation Program for all Supply System and selected contractor employees.

Review of the random data base in September showed that on September 9, 1994, one individual who had emergency plan functions which required them to report to the Emergency Operations Facility (EOF) was removed from the FFD random test pool. This individual had their unescorted access terminated, but maintained their emergency response requirements. The individual was deleted from the FFD pool when FFD inadvertently identified them as "inactive" in the Emergency Response Organization. Upon discovery of this event, the individual was immediately placed back into the FFD random pool. A Problem Evaluation Request (PER) was submitted. A meeting was conducted with the FFD staff to discuss this event and the FFD requirements for emergency responders. A meeting was conducted also with Emergency Planning to discuss this event and the FFD requirements for emergency responders.

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A corrective action was initiated and the termination checklist has been modified to clarify when and how a person is removed from the Emergency Response Organization and FFD random pool. Written approval from the FFD Supervisor (or designee) is now required to delete a person from the random pool.

An on-site survey of the EMIT laboratory was conducted by the State of Washington on October 27, 1994. The Supply System's EMIT laboratory is a state certified medical test site meeting the requirements of Chapter 70.42 RCW and Chapter 246-338 WAC. The state inspection report emphasized the exceptional status of the laboratory testing. The EMIT staff were found to be technically competent, particularly within the complex system of internal and external audits and various regulatory mandates. Especially notable was the blind sample program and the other extra measures taken to assure the highest level of quality of laboratory testing. These strengths were also noted in a Quality Assurance audit in November.

In November 1994, 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 FFD program, as implemented by the Supply System at WNP-2, is effectively implemented and meets or exceeds 10 CFR 26 requirements. The program is also effective in creating a work environment which is free of drugs and the effects of such substances. Dr. Proelss, the technical consultant noted that his overall impression of FFD was that the program was effective and well defined. He noted several strengths. First, the EMIT screening technician and EMIT staff are exceptional in comparison to other facilities. The quality of the on-site testing as well as the internal sample program is excellent. Second, the collection site staff and functions are excellent and he noted the professional demeanor was above average and commendable. The third and final area of strength was in the program administration. He noted that administrative procedures and records were complete and in proper order. The staff was knowledgeable and cooperative.

The audit resulted in several recommendations and one suggestion for program improvements. Several of the recommendations made during the audit were incorporated into the program.

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:

- In October, responsibility for the Continued Behavioral Observation Program (CBOP) was moved from the Director, Human Resources to the Manager, Security Programs.

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- A new FFD / Continued Behavioral Observation Program (CBOP) lesson plan was developed to strengthen the CBOP training. In the past the main focus of FFD training was on substance abuse. However, the equally important part of the FFD program, CBOP, needed to be enhanced. CBOP techniques for detecting degrading performance, impairment or significant changes in behavior now has added emphasis. This lesson plan has been implemented in GET Escort, Awareness and Supervisor training.
- A special one-time CBOP training session was presented to managers and supervisors during the month of October. This training communicated the CBOP enhancements and provided supervisors / managers with ways to recognize and effectively deal with behavior which calls into question a person's judgement, and so his/her reliability and trustworthiness.
- Managers and supervisors provided a version of their special CBOP training to their staff.
- FFD created a video library available to employees. The videos are designed for use in a variety of settings and may be checked out for meetings, personal, home or community use. These videos are considered a prevention resource and provide a focus on our goal of achieving a healthy and drug free workforce.
- The contract for drug collection technicians was eliminated saving the FFD Program a considerable amount in its operating costs. The contract elimination allowed FFD to staff the collection technician position with Supply System personnel and cross-train two current FFD administrative staff members as collection technicians. This enhances the program by allowing increased flexibility of staffing hours and availability for collections while controlling cost.

Performance Summary for 1994

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, 1994.
- 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, 1994 reporting period.
- 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, 1994.

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Chart 4 FFD Off Shift & Weekend Testing 1994. This chart shows that 15% of the FFD Chemical testing program was administered during off shifts.

Graph Summary:

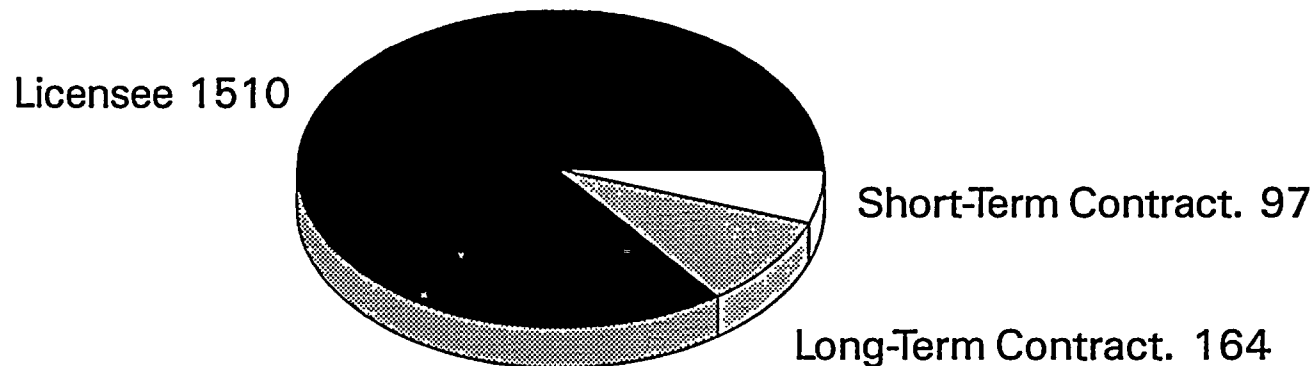
- Graph 1 Random Test Failures. This graph shows the total number of random test failures during the July to December reporting periods. Last year's zero random positives for the reporting period was not repeated during this reporting period, the record shows that there was one random positive between July 1 and December 31, 1994.
- Graph 2 1994 MRO Confirmed Positive Tests, Pre-Access, Random and Follow-Up. This graph shows the overall confirmed positive chemical test results by employee type for the calendar year 1994.
- Graph 3 Pre-Access Positives. This graph shows that of the twenty-one MRO confirmed pre-access positive test results, seventeen or 80% occurred during the Outage months of April and May. This graph also shows the drug of choice remains marijuana. However, there is an increase in the use of cocaine among the short term contractors applying for access to work the outage.
- Graph 4 Random Positives 1994. This graph shows that three confirmed random positives occurred during the calendar year 1994. Marijuana was the drug of choice with two random confirmed positives and cocaine was second, with one random test confirmed positive. This data also affirms marijuana as the drug of choice for this geographical area, followed by cocaine as the second drug of choice.

Conclusion

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

Supply System FFD Program

Tests By Employee Type

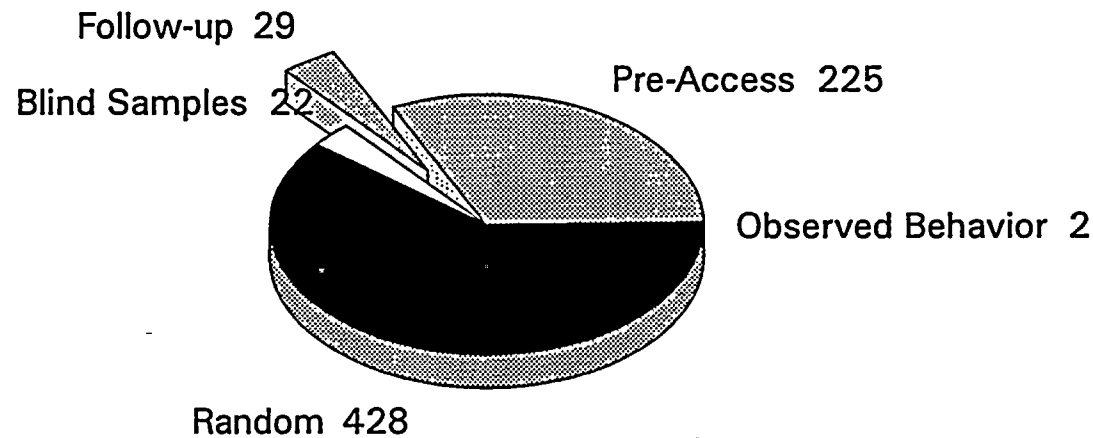


Average Random Pool Size = 1,771
July to December Reporting Period

Chart 1
July 1 to December 31, 1994

Supply System FFD Program

Chemical Tests By Type For Current Reporting Period



706 Total Tests

Chart 2
July 1 to December 31, 1994

Supply System FFD Program

Tests By Type

For 1994 Calendar Year

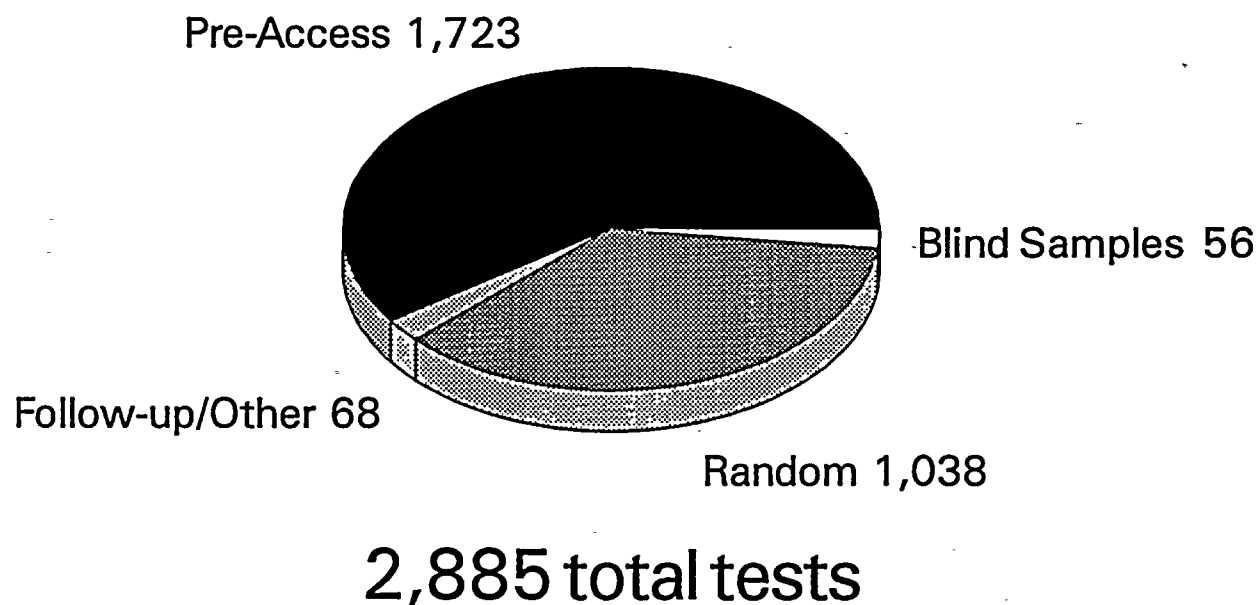


Chart 3

January 1 to December 31, 1994

FFD Off Shift and Weekend Testing

January 1 to December 31, 1994

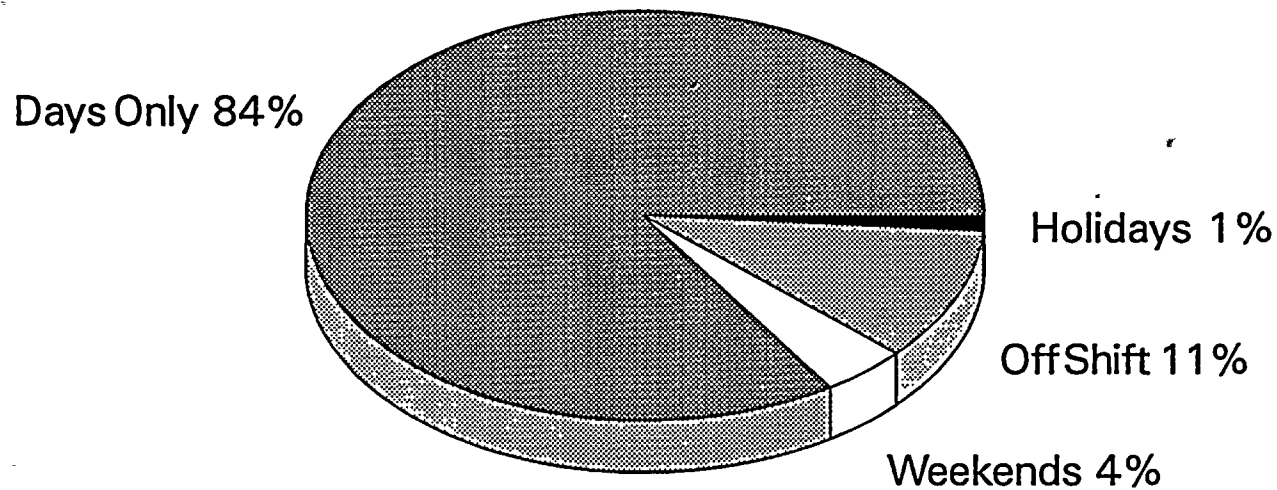


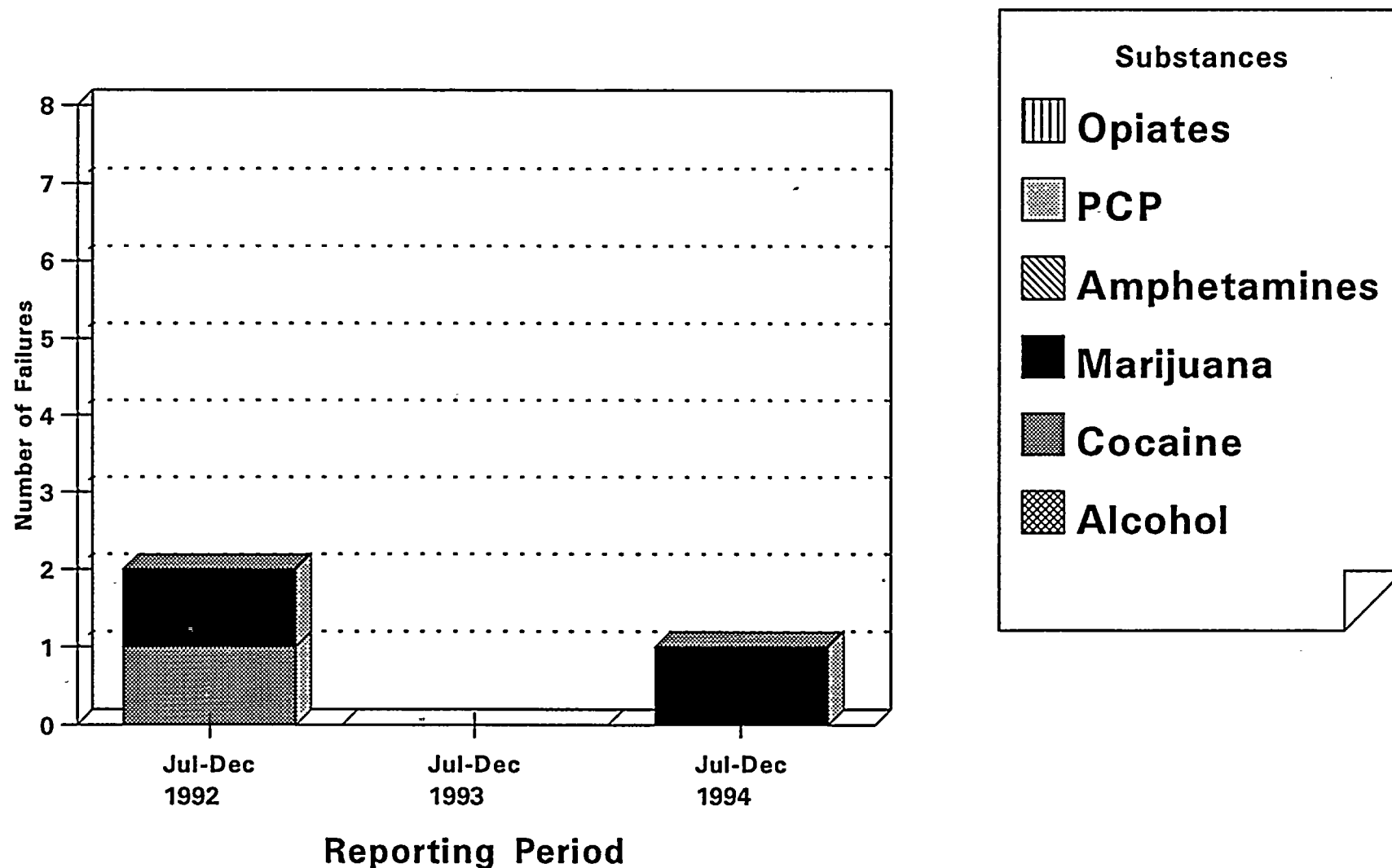
Chart 4

January 1 to December 31, 1994

Random Test Failures

July to December Reporting Period

1992, 1993 & 1994



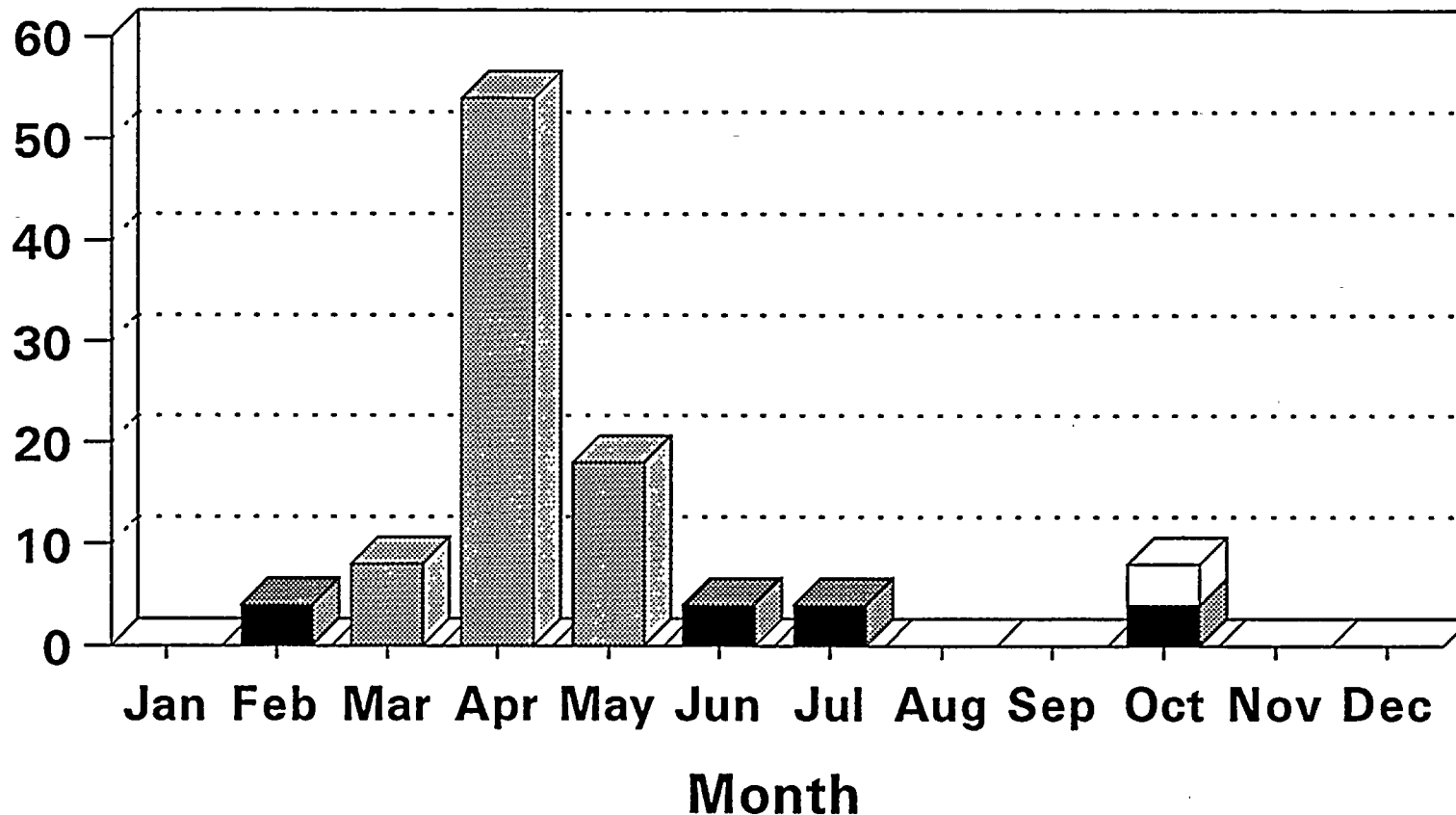
Graph 1
Random Results Only

MRO Confirmed Positives

By Employee Type

January 1 to December 31, 1994

% Tested Positive of 26 Confirmations

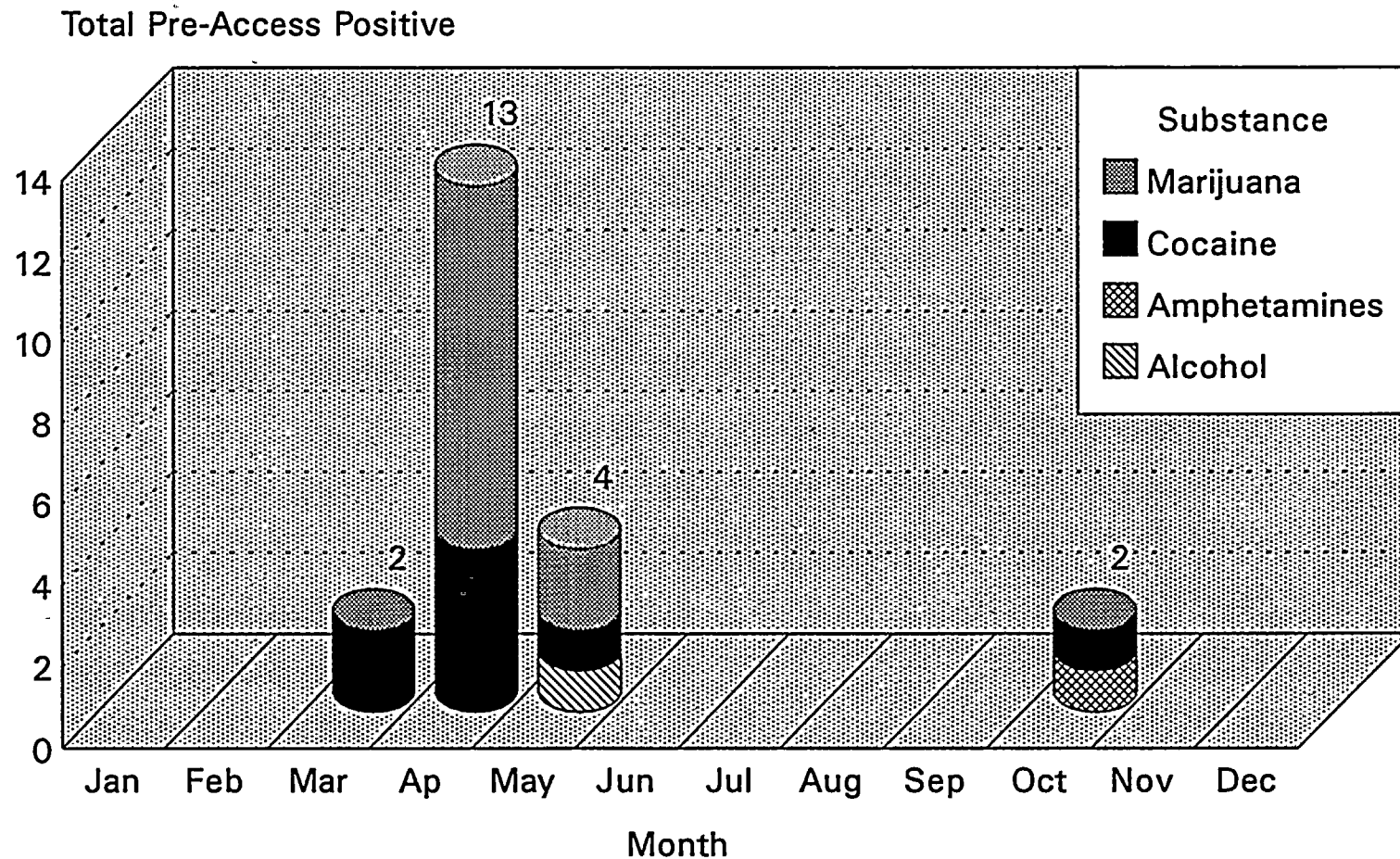


■ Licensee Employee □ Long Term Contract ▒ Short Term Contract

Graph 2

Pre-Access Positives 1994

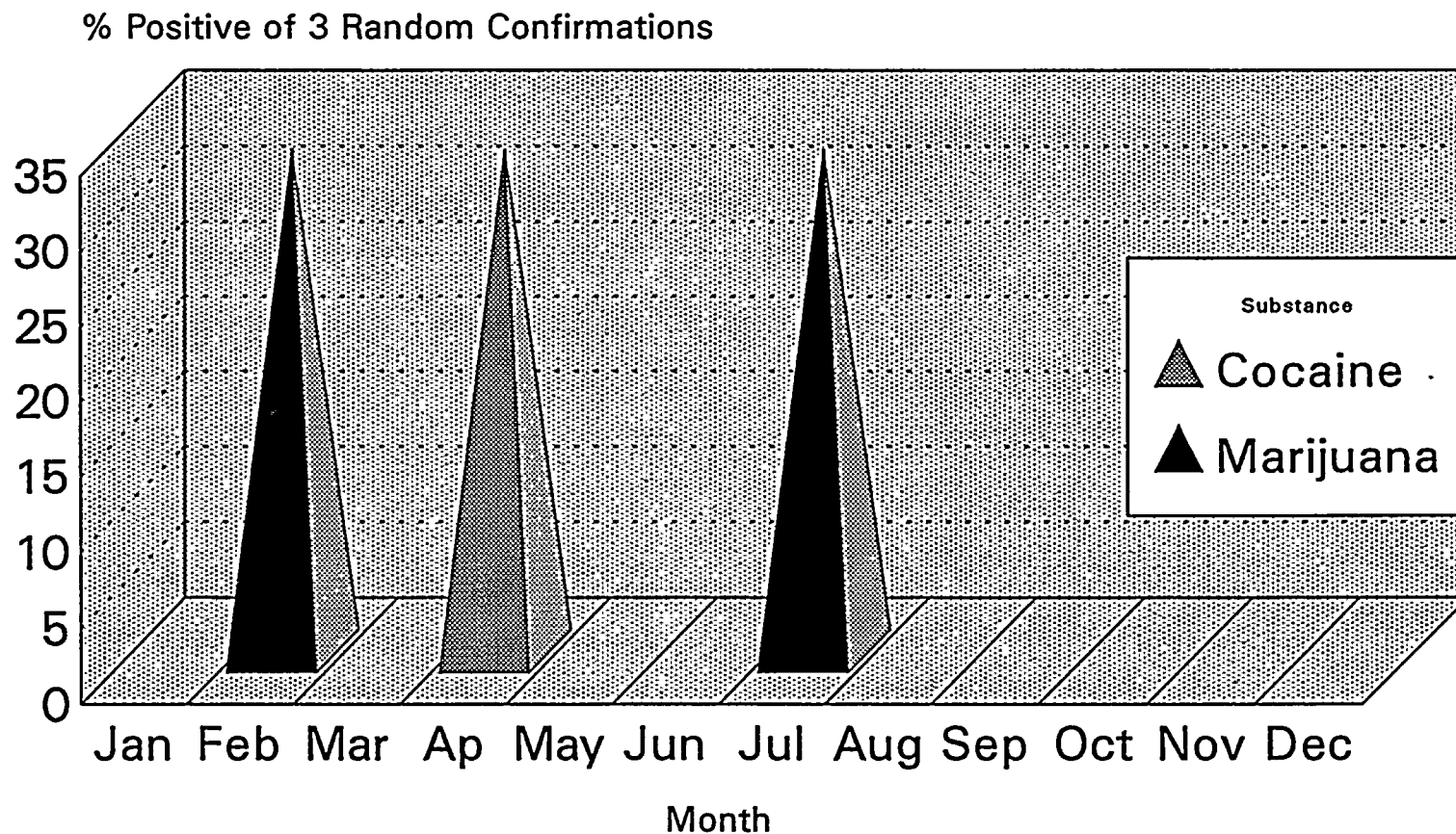
Monthly MRO Pre-Access Confirmations By Substance



Graph 3
January 1 - December 31, 1994

Random Positives 1994

Random Confirmations by Substance Percentage by Month



Graph 4
January 1 - December 31, 1994

