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for Jan-June 1995.

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August 25, 1995

Docket No. 50-397

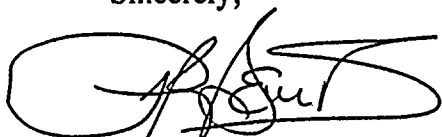
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Subject: **WNP-2 OPERATING LICENSE NPF-21
FITNESS FOR DUTY SEMIANNUAL PERFORMANCE DATA REPORT
JANUARY 1, 1995, TO JUNE 30, 1995**

Pursuant to 10 CFR 26.71(d), enclosed is the Washington Public Power Supply System's Fitness for Duty Semiannual Performance Data report for January 1, 1995, to June 30, 1995. 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.

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,



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

/sd

Attachment: Fitness for Duty Semiannual Performance Data Report for January 1, 1995 to June 30, 1995.

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

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THE UNITED STATES OF AMERICA
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

WYOMING
SANDWICH MOUNTAIN
NATIONAL MONUMENT

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

| | |
|--|-----------------------------------|
| Washington Public Power Supply System, WNP-2 | 6 Months Ending: June 30, 1995 |
| 3000 George Washington Way | Richland, WA 99352 |
| Contact Name: J.A. Gloyn | Phone: (509) 377-8320 |

[x] Appendix A to 10CFR26

| Cutoffs: | Screen / | Confirmation | | Screen / | Confirmation |
|--------------|----------|--------------|-----------------|----------|--------------|
| Marijuana | 50 | 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: | 1508 | | 103 | | 447 | |
| Category | # Tested | # Positive | # Tested | # Positive | # Tested | #Positive |
| Pre-Access | 256 | 1 | 25 | 0 | 919 | 18 |
| Post-Accident | 0 | 0 | 0 | 0 | 1 | 0 |
| Observed Behavior | 3 | 0 | 0 | 0 | 1 | 0 |
| Random | 462 | 1 | 31 | 0 | 117 | 1 |
| Follow-Up | 21 | 0 | 0 | 0 | 6 | 0 |
| Other | 24 | 1 | 0 | 0 | 39 | 1 |
| Total | 766 | 3 | 56 | 0 | 1083 | 20 |

Breakdown of Confirmed Positive Tests for Specific Substances:

| | THC/ 100 ng/ml screen | THC/ 50 ng/ml screen | Cocaine | Opiates | Amphetamines | P C P | Alcohol |
|---------------------------|--------------------------------|-------------------------------|----------|----------|--------------|-------------|----------|
| Licensee Employees | 0 | 3 | 0 | 0 | 0 | 0 | 0 |
| Long-Term Contractors | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Short-Term Contractors | 3 | 9 | 3 | 0 | 3 | 0 | 0 |
| Total | 3 | 12 | 3 | 0 | 3 | 0 | 0 |

| | Barbiturates | Benzodiazepines | Both THC & Amphetamines | Refuse to Test |
|---------------------------|--------------|-----------------|----------------------------|-------------------|
| Licensee Employees | 0 | 0 | 0 | 0 |
| Long-Term Contractors | 0 | 0 | 0 | 0 |
| Short-Term Contractors | 0 | 0 | 2 | 2 |
| Total | 0 | 0 | 2 | 2 |



NUCLEAR PLANT NO. 2

PERFORMANCE DATA REPORT

January 1 to June 30, 1995

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 first six month reporting period of 1995, January 1 to June 30, 1995. The data for this six month reporting period 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 this reporting period, the Supply System performed 610 random drug and alcohol tests. This represents a testing rate of 29.6% of the average population of 2,058 with unescorted access for the January 1 to June 30, 1995 reporting period, which meets and exceeds the requirements of 10 CFR 26.

The incidence of two confirmed positive random drug and alcohol tests in 610 random tests performed during this reporting period is 0.3%.

Program Result Analysis

Pre-Access

The Medical Review Officer (MRO) confirmed positive nineteen (19) drug test results in the Pre-Access test category for the six month period January 1 to June 30, 1995. One confirmed positive test result was a Supply System applicant for access. Eighteen confirmed positive test results were short term contractors applying for access to support the R-10 refueling outage.

Breakdown of the nineteen MRO confirmed positive chemical test results by drug show, two cocaine, twelve marijuana, three amphetamines and two for multiple drug combinations of marijuana and amphetamines.

In addition to the MRO confirmed positive results there were four cases of verified sample substitution. These four were identified through out of range specimen temperatures during the collection process. There was one case of refusal to test, which was recorded as termination for cause. All of these cases have been denied access for a minimum of three years in accordance with Supply System policy.

FFD PERFORMANCE DATA REPORT

January 1 to June 30, 1995

page 2

Observed Behavior / For Cause

There were four drug/alcohol tests administered for observed behavior/for cause, during this reporting period. The causes through behavioral observations were, inappropriate behavior, odor of alcohol and behavior, and two sleeping or appearing to be asleep on the job. The first case involved a temporary licensee employee engaging in a verbal exchange and inappropriate behavior with a security officer at the alternate access point prior to entering the Protected Area. The second case involved a temporary licensee electrician found sleeping inside the Protected Area. The third case involved a security officer that did not respond to a radio call and was found asleep in his vehicle outside the Protected Area. The fourth case involved a short term contractor who smelled of alcohol inside the Protected Area. However, there were no behavior or physical characteristics indicating that the individual was under the influence of alcohol. All four breath alcohol tests resulted in negative readings. All four drug tests administered included testing for an expanded panel of the NIDA-5 to include barbiturates and benzodiazepines. The four drug tests produced negative results. To date, there have been no positive results for barbiturates or benzodiazepines. During the same January to June reporting period for 1994, there were three drug/alcohol tests administered for observable behavior/for cause, with one positive result.

Post Accident

As the result of a crane accident occurring on the swing shift, one post accident drug/alcohol test was administered during this reporting period. The individual involved was a short term contractor assigned to operate a Grove 60 ton crane inside the Protected Area. While operating the crane the individual failed to perform a critical step involving the on board computer. The crane was damaged, however, there was no personal injury as a result of the accident. The individual was drug/alcohol tested for an expanded panel of NIDA-5, plus barbiturates and benzodiazepines. All test results were negative. During the same January to June reporting period of 1994, there were no post accident drug/alcohol tests administered.

Random

The Supply System randomly tested 610 individuals during the reporting period of January to June 1995. The average population of those eligible for random selection during the reporting period was composed of 2,058 individuals. Of those 2,058, 1,508 were Supply System employees, 103 were long term contractors and 447 were short term contractors. Of the 610 randomly tested during this reporting period, the MRO confirmed two random test results positive.

The two positive test results in 610 random tests results in a 0.3 percent random positive rate for this reporting period.

FFD PERFORMANCE DATA REPORT

January 1 to June 30, 1995

page 3

This random positive rate of 0.3 percent is the same as the random positive rate of 0.3 percent during the January to June reporting period of 1994.

Management Actions

One random test result was positive for marijuana, screening at the more stringent cut-off level of 50 ng/ml. However, based on less than six months of screening at 50 ng/ml for THC an accuracy rate of 85% could not be established. In this case the administrative action to suspend access for a presumptive positive marijuana pending confirmatory results was not taken.

The random presumptive positive result for cocaine did result in temporary suspension of unescorted access pending the confirmatory results. The accuracy rate for EMIT presumptive positive screening of cocaine for the previous 6-month reporting period going on to confirmation is 100%.

Both individuals with confirmed positive test results on random testing were denied access to the Protected Area of WNP-2 for fourteen days and referred to treatment. One was a licensee employee and the other a short term contractor. Following treatment, the licensee employee returned to work, regained access and is currently participating in the follow-up program. The other, a short term contractor, did not return to work and subsequently terminated employment.

Additionally, one short term contractor, when notified that he had been selected for random testing, refused to test and immediately submitted his resignation. The refusal was recorded as a termination for cause and in accordance with Supply System policy, access was denied for three years.

Follow-Up

Under the follow-up testing program 27 drug/alcohol tests were administered during this reporting period. All test results were negative. The Supply System has ten licensee employees currently participating in the follow-up program, based on results of positive chemical tests at the Supply System since January 1, 1990. There were an additional two short term contractor employees participating in the follow-up program for the duration of the R-10 outage.

Other

Due to the four cases of confirmed urine sample tampering by substitution it was concluded that there was sufficient grounds to believe that other individuals may have tampered with drug tests by substituting urine specimen samples. These four cases occurred during the weeks of March 6 to March 29, 1995 and R-10 outage in-processing. Following the fourth substitution, FFD implemented a policy of requiring all personnel to remove their shoes, empty their pockets and rabbit ear their pockets prior to entering the collection room.

FFD PERFORMANCE DATA REPORT

January 1 to June 30, 1995

page 4

Additionally, consideration was given to temperatures as the primary indicator of possible tampering by substitution. The Supply System decided to narrow the allowable temperature range for acceptable urine specimens. The regulatory lower limit of 90.5°F was changed to a more stringent standard of 94°F as the lowest acceptable temperature at the Supply System. This is allowable within the guidelines of 10CFR26 and is in line with other nuclear utilities. This change became effective April 29, 1995.

To remove the potential of possible tampering by substitution and to increase assurance of having individuals inside the protected area of WNP-2 that were not impaired by drugs, the Supply System decided to conduct FFD testing of individuals who had, during the in-processing period, provided a urine specimen that fell below the new temperature cut-off.

The pre-access chemical test files of 929 individuals in-processing between March 6 and March 29, 1995 were reviewed. A group of 70 individuals were identified as providing specimens with temperatures below 94°F, the new Supply System guideline, but above the 90.5°F acceptable under the rule and the old Supply System guideline. Beginning May 1, 1995, testing of this target group of individuals was initiated. The chemical tests were classified as other for sample verification purposes and are being reported here as other tests.

From the initial target group of 70 individuals, one individual was disqualified from the testing by review of the original records and review of the temperature which was in range. Three individuals were identified as no longer employed due to end of assignment or termination of employment for other work. One individual was terminated as a result of a medical emergency. One individual quit as a result of the other FFD testing. The remaining 63 individuals were chemically tested with limited notification.

Of this remaining group, there were two attempts at substitution and two confirmed positive test results. One attempt at substitution resulted in a high out of range specimen temperature of 104°F on presentation with an oral temperature of 99.2°F. That individual did not provide another specimen under observation but did acknowledge that the specimen presented had been a substitute. This was recorded as removal for cause. Access was denied for three years in accordance with Supply System policy and employment was terminated.

The other attempt at substitution resulted in a specimen temperature of 92°F on presentation with an oral temperature of 97.8°F. The individual did remain to provide another specimen under observation. This second specimen obtained under observation differed not only in temperature but also specific gravity. The variations were significant enough for the MRO to conclude that he suspected tampering. Based on the MRO's medical opinion that this individual had provided two different samples, the individual's access was suspended pending the laboratory results. The HHS-certified laboratory reports resulted in a MRO verified tampering by substitution. This was recorded as removal for cause. That individual was denied access for three years in accordance with Supply System policy and employment was terminated.



FFD PERFORMANCE DATA REPORT

January 1 to June 30, 1995

page 5

The two MRO confirmed positive test results in the "other" category were for marijuana. Both individuals were denied access for 14 days and referred to treatment. One was a temporary licensee employee, the other a short term contractor. During the fourteen day denial period both did seek treatment and because of the time required for treatment and the length of the temporary assignment remaining, both terminated employment.

The discovery of sample substitutions and the aggressive actions taken in response to this discovery are viewed as a positive indication of how well the FFD collection process works.

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.

Appeals

During this reporting period no individual appealed their test determinations.

Program Review

An assessment of the Fitness for Duty Program (FFD) was performed by a peer group from Entergy Operations during the week of March 6 to 10, 1995. The scope of the assessment included a review of the FFD program with an emphasis on the Continued Behavior Observation Program (CBOP), management expectations, employee knowledge and the overall drug screening process utilized by the Supply System. Among the strengths found were; site management exhibited a heightened awareness of CBOP elements, training handouts provided thorough guidance and examples of CBOP elements, supplemental reference materials provided employees and management regarding substance identification and signs of abuse were excellent, and laboratory testing techniques, reviews and proficiency participation enhance 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:

- March 1, 1995, the Supply System Fitness for Duty policy was revised to lower the initial screening level for marijuana from the regulatory requirement of 100 ng/ml to 50 ng/ml. This proactive change was made to facilitate laboratory testing. The federal laboratory standards were changed in 1994.

FFD PERFORMANCE DATA REPORT

January 1 to June 30, 1995

page 6

- A new Medical Review Officer, Dr. James C. Fulper, MD, MRO was hired effective March 1, 1995. This change was due to the retirement of the Dr. James F. Stager, the Supply System's primary MRO.
- Equipment and instrumentation changes were made to enhance the collection process. FFD purchased and is using the digital urinometer for measuring specific gravity. Several "state of the art" infrared non-contact thermometer, called the determinator, have been added to enhance temperature readings. New breath alcohol analyzers, the Alco-Sensor IV, were put into service at the first of the year.
- More stringent collection procedures were adopted in response to several attempts to substitute samples. These procedures included narrowing of the acceptable specimen temperature range using 94°F as the lowest acceptable temperature reading. Medically and physiologically, it is established that the variance in urine temperature is always plus (+) or minus (-) one-half a degree (1/2°F) from 98.6°F or normal body temperature. This change in the acceptable urine specimen temperature range is viewed as a positive as it is an aggressive step to deter substitution and adulteration. This is also consistent with the 94°F floor used by several other utilities.
- FFD adopted a policy allowing temporary access suspension for presumptive test results for marijuana and cocaine following rule guidelines.

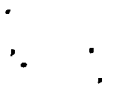
Performance Summary for 1994

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 that was administered by the Fitness for Duty Program from January 1 to June 30, 1995.
- Chart 2 Chemical Tests by Type. This chart shows the breakdown of drug and alcohol tests by category for the January 1 to June 30, 1995 reporting period.
- Chart 3 FFD Off Shift & Weekend Testing. This chart shows that 25% of the FFD Chemical testing program was administered during off shifts between January 1 to June 30, 1995.

Graph Summary:

- Graph 1 Random Test Failures. This graph shows a comparison of the total number of random test failures during the January to June reporting periods of 1993, 1994 & 1995.



FFD PERFORMANCE DATA REPORT

January 1 to June 30, 1995

page 7

- Graph 2 MRO Confirmed Positives, Monthly Percentage by Employee Type. This graph shows the percentages of confirmed positive chemical test results by employee type between January 1 and June 30, 1995. It shows that the majority of positive results occurred during the outage in-processing months of March and April.
- Graph 3 MRO Confirmed Positive Results, Monthly Confirmations by Substance. This graph shows the nineteen confirmed pre-access, two random and two other positive test results by chemical. It shows the drug of choice remains marijuana, however, there is an increase in the use of amphetamines and for the first time individuals are testing positive for more than one drug on the same chemical test.

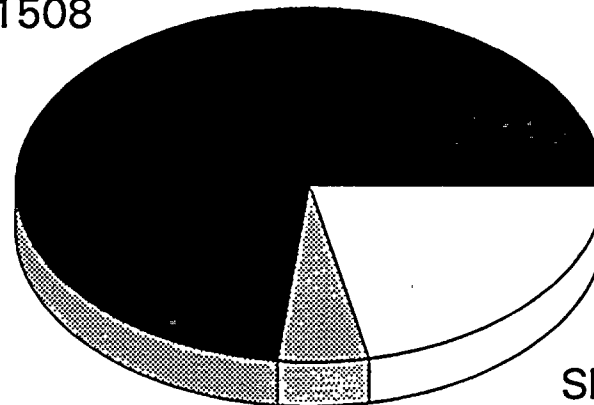
Conclusion

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

Licensee 1508



Short-Term Contract. 447

Long-Term Contract. 103

Average Random Pool Size = 2,058

Chart 1

July 1 to December 31, 1994

Supply System FFD Program

Chemical Tests By Type

For Current Reporting Period

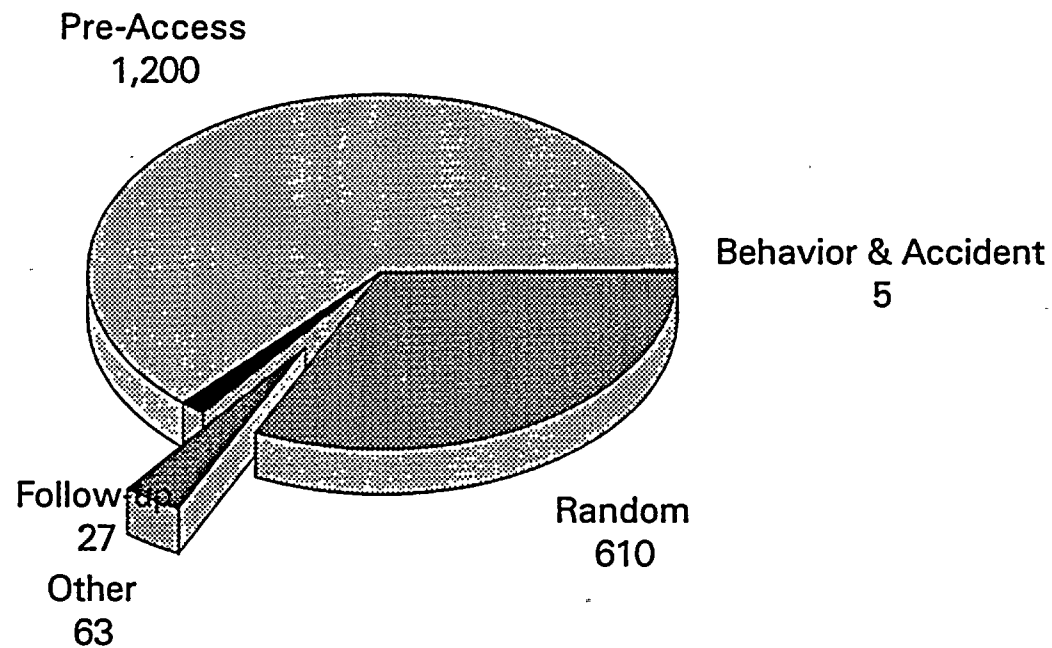


Chart 2

January 1 to June 30, 1995

FFD Off Shift and Weekend Testing

Semi-Annual Reporting Period

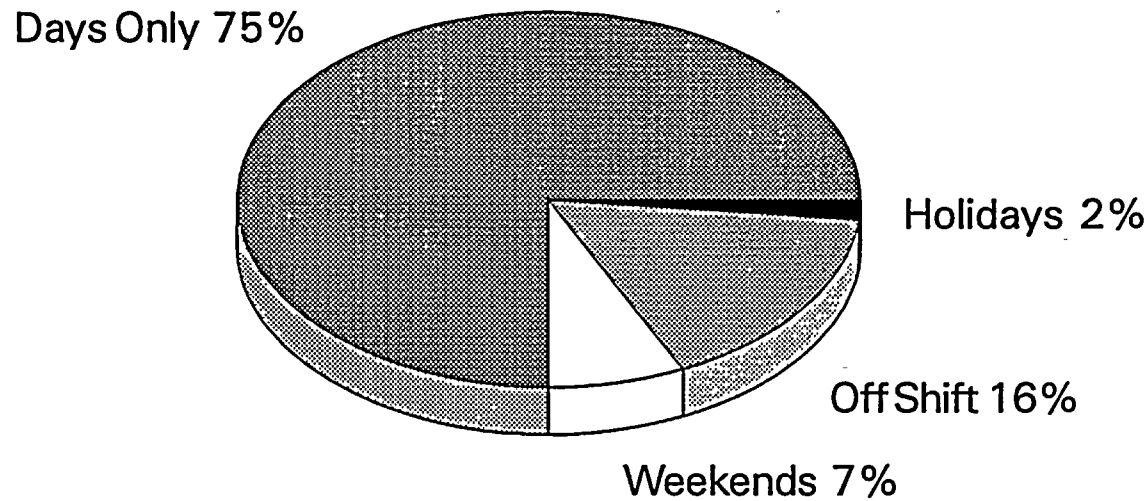


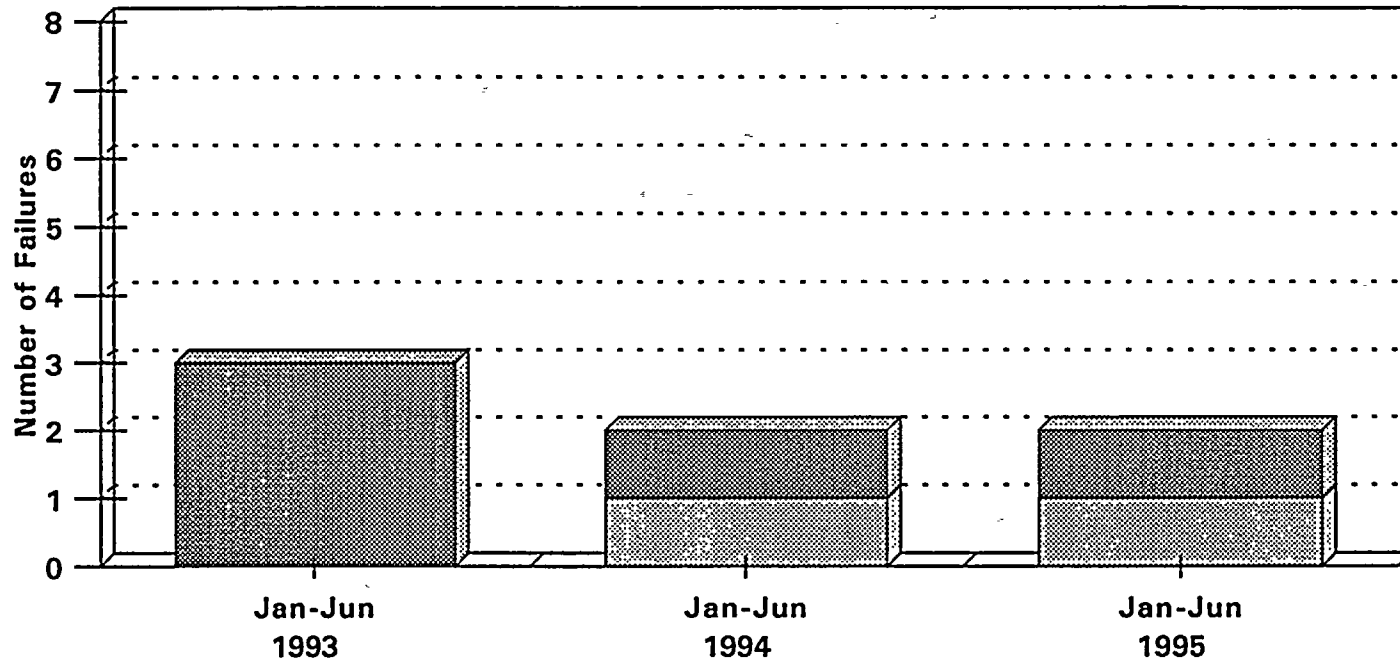
Chart 3
January 1 to June 30, 1995



Random Test Failures

January 1 to June 30 Reporting Periods

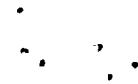
1993, 1994 & 1995



| | | | |
|-----------|---|---|---|
| Marijuana | 3 | 1 | 1 |
| Cocaine | 0 | 1 | 1 |

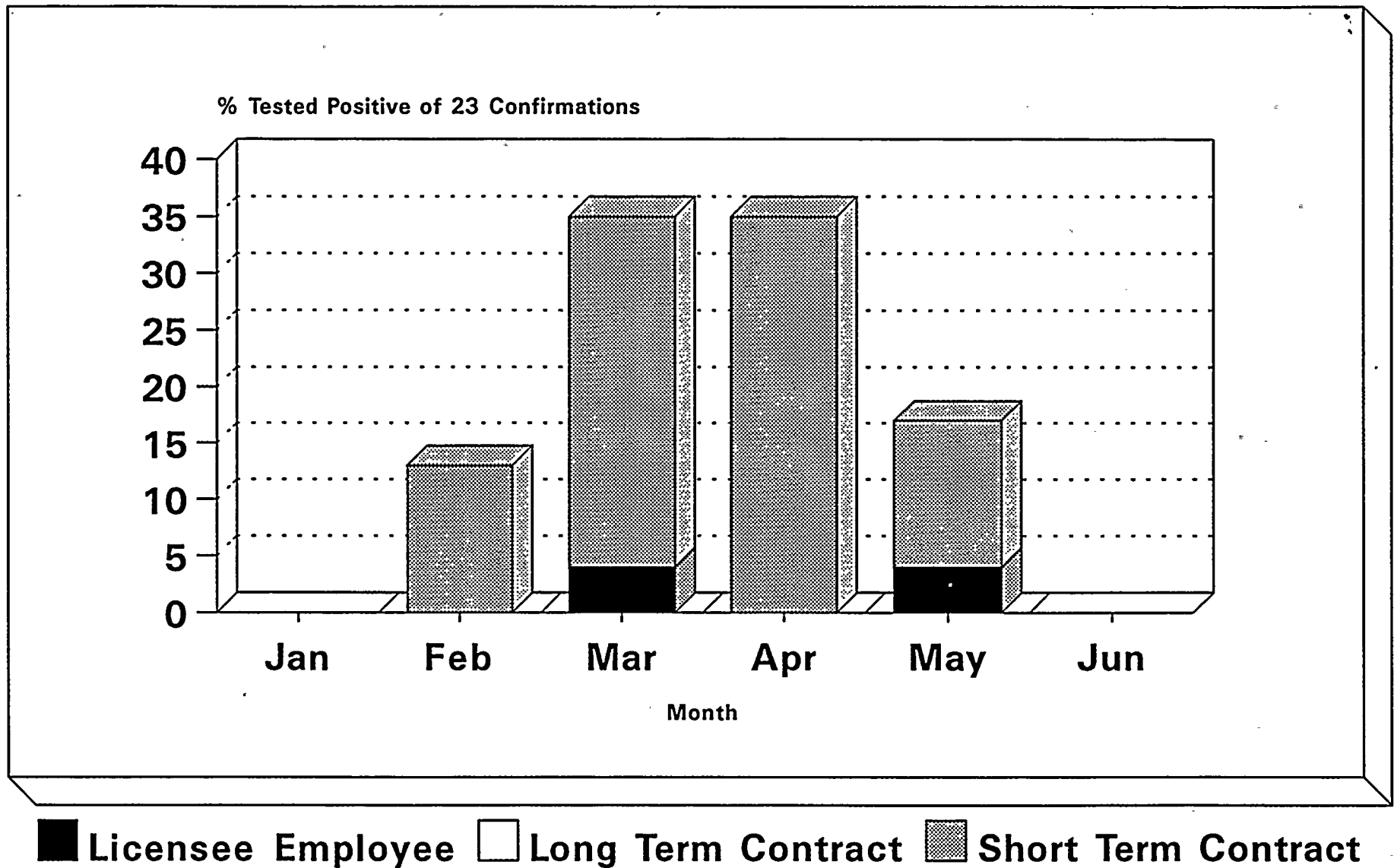
Reporting Period

Graph 1
Random Results Only



MRO Confirmed Positives

Monthly Percentage by Employee Type



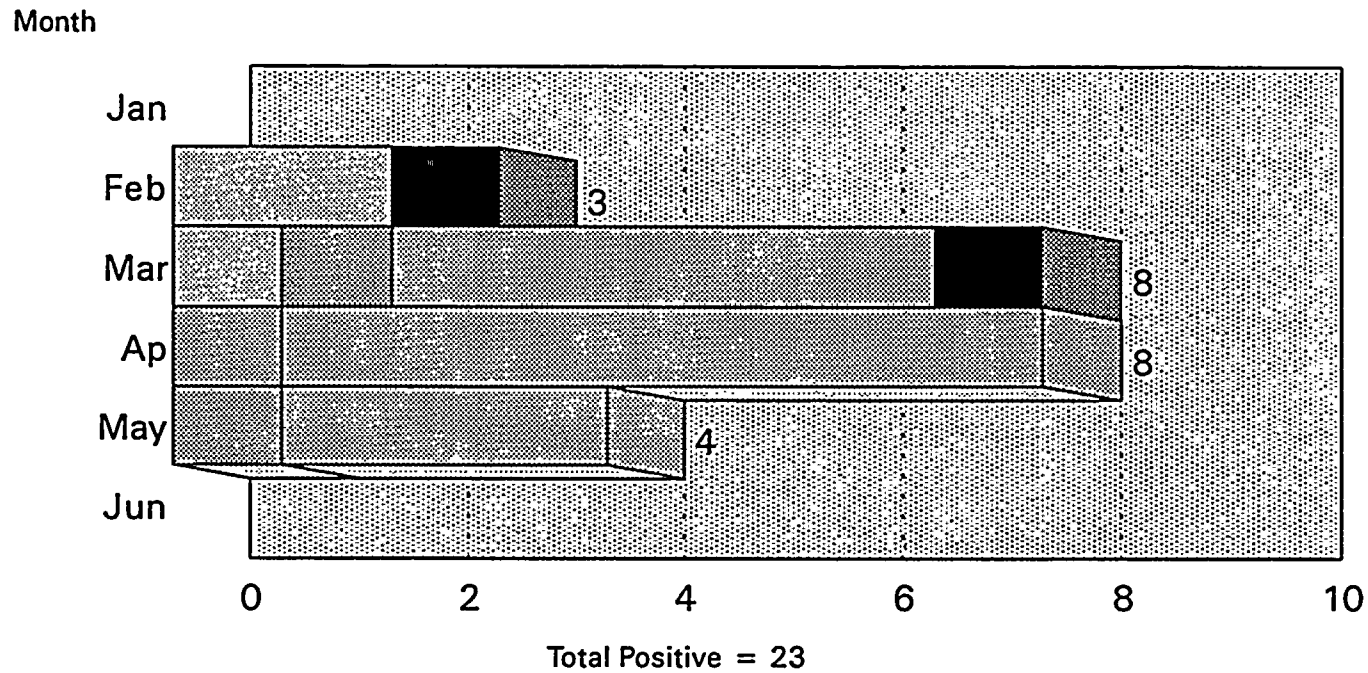
Graph 2

January 1 to June 30, 1995



MRO Confirmed Positive Results

Monthly Confirmations by Substance



| | | | | | | |
|---------------|---|---|---|---|---|---|
| Amphetamines | 0 | 2 | 1 | 0 | 0 | 0 |
| Cocaine | 0 | 0 | 1 | 1 | 1 | 0 |
| THC | 0 | 0 | 5 | 7 | 3 | 0 |
| THC & Amphet. | 0 | 1 | 1 | 0 | 0 | 0 |

Graph 3
January 1 - June 30, 1995

