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 CONWAY, W.F. Arizona Public Service Co. (formerly Arizona Nuclear Power R
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SUBJECT: Discusses util compliance w/fitness for duty implementation. D

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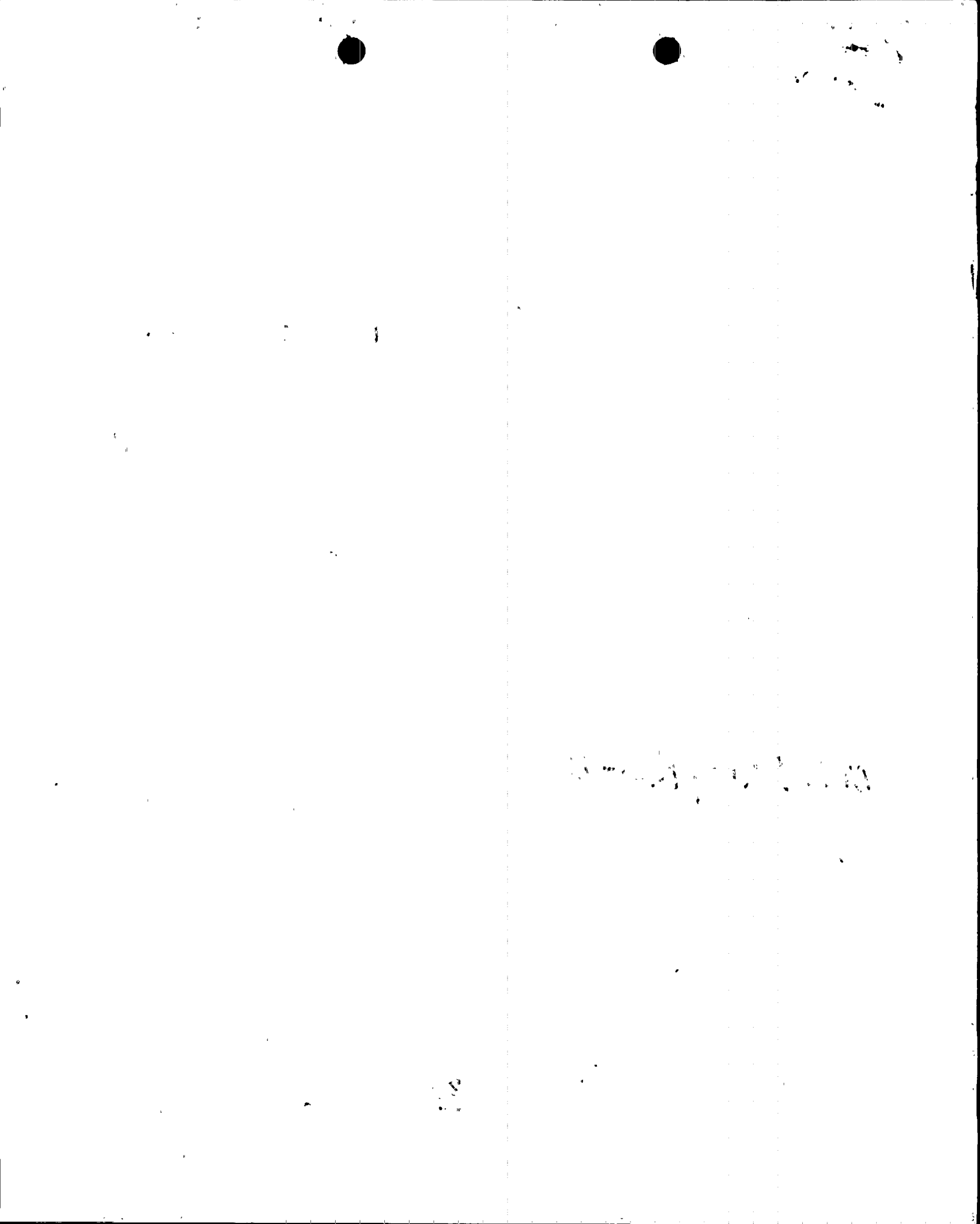
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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

102-01776-WFC/KR
July 12, 1990

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station P1-37
Washington, D. C. 20555

Reference: (1) Letter to U. S. NRC from W. F. Conway (APS),
(161-02731) dated January 2, 1990

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, & 3
Compliance with Fitness for Duty Implementation
File: 90-056-026

Arizona Public Service (APS) certified the implementation of the Fitness for Duty program in accordance with 10 CFR 26.73 for Palo Verde Nuclear Generating Station (PVNGS) by Reference (1).

At the time of transmittal of the referenced letter, APS believed that its Fitness For Duty program was in full compliance with the rule, based in part, on the following facts:

- (1) A contract existed between APS and BPL Toxicology Laboratory of Tarzana, California (BPL) for performance of laboratory analysis of urine specimens furnished by APS.
- (2) While the BPL application for HHS-certification was pending, BPL was subcontracting with Laboratory Specialists, Inc. of Chatsworth, California (LSI), a HHS-certified laboratory, to perform the confirmatory tests.
- (3) BPL was on APS's "Approved Vendors List."

Subsequently, a review by APS Vendor Quality Monitoring found that no pre-award inspection or evaluation of LSI had been performed at APS. BPL was advised on January 19, 1990, that, effective immediately, drug analysis under the APS contract was suspended. Urine specimens at BPL and at PVNGS awaiting confirmatory testing were placed in cold storage. An audit and monitoring team was sent to LSI.

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APS has concluded that the results of the inspection and evaluation of LSI are satisfactory. A letter of agreement with LSI has been in place as of February 2, 1990.

APS has implemented the Fitness For Duty program with more stringent cutoff levels for marijuana metabolites and amphetamines than those specified in 10 CFR 26, Appendix A. For initial test cut-off levels, marijuana metabolites are 20 ng/ml, amphetamines are 300 ng/ml and methamphetamines are 1000 ng/ml. For confirmatory test cut-off levels, marijuana metabolites are 15 ng/ml, amphetamines are 300 ng/ml and methamphetamines are 300 ng/ml. Furthermore, PVNGS's Fitness for Duty Program tests for Barbiturates and Benzodiazepines. The initial and confirmatory test cut-off levels are 300 ng/ml for each substance.

If you have any questions, please contact A. C. Rogers of my staff at (602) 340-4041.

Sincerely,



WFC/KR/dmn

cc: W. F. Conway
J. B. Martin
D. H. Coe
A. C. Gehr
A. H. Gutterman
S. R. Peterson

