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SUBJECT: Forwards util fitness for duty semiannual performance rept
 for period of Jan 1990 - June 1990.

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-03432-WFC/KLMC
August 27, 1990

Docket Nos. STN 50-528/529/530

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

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Fitness-for-Duty Semiannual Performance Report
File: 90-056-026

Pursuant to 10 CFR 26.71(d), the Attachment to this letter provides the Arizona Public Service (APS) Fitness-for-Duty semiannual performance report for the period of January 1990 through June 1990.

If you have any questions concerning this matter, contact Mr. A. C. Rogers at (602) 340-4041.

Sincerely,



9009060204 900827
PDR ADDOCK 05000528
R PNU

WFC/RAB/KLMC

Attachment

cc: J. B. Martin
L. L. Bush
D. H. Coe
A. C. Gehr
A. H. Gutterman

Accd Add: NRR/DRIS/RSG-B H. Encl

ARIZONA PUBLIC SERVICE

FITNESS-FOR-DUTY PROGRAM
PERFORMANCE REPORT

January 1990 through June 1990

Introduction

APS' year-to-date statistics demonstrate that the implementation of the Fitness-for-Duty program has been successful in maintaining a drug-free work place. The number of confirmed positive test results has dropped significantly since the Fitness-for-Duty Rule (10 CFR Part 26) became effective. APS credits a major portion of this success to good communication, enhanced awareness and education. These efforts were made by APS and our contractor companies.

Analysis of Program Results

We have performed a statistical breakdown of the confirmed positive drug test results by the reason for the test and the type of drug as follows.

Pre-badge Testing:

14	Marijuana
1	Amphetamine
1	Cocaine
2	Alcohol
<hr/>	
18	Total

Comments: A total of 1,695 individuals were pre-badge tested. All positive pre-badge drug test results involved contractor employees. Outages during this time period necessitated a large number of pre-badge tests. A conclusion that could be reached by these statistics is that education plays an important role in the Fitness-for-Duty Program implementation.

For Cause Testing:

1 Alcohol

Comments: Based upon a combination of behavioral observation and allegation investigation, APS tested 17 individuals for cause during this reporting period. There was one positive alcohol test result from a contractor employee.

Random Testing:

1	Alcohol
1	Amphetamine
3	Cocaine
<hr/>	
5	Total

FFD Program Performance Report
January through June, 1990
Page Two

Comments: 2,042 individuals were tested during this reporting period. All positive random drug test results involved contractor personnel. Four out of the five tested positive on their first random test, one individual tested positive after the second random test (one month after the first test).

Post Accident Testing:

One test was performed during this reporting period; the test result was negative.

Follow-Up Testing:

Prior to the implementation of the Fitness-for-Duty Rule (10 CFR Part 26), APS had implemented a one-year follow-up testing program for those APS employees who had a positive drug test. As of January 1990, there were six employees under the old program. At the end of this reporting period, three employees remained in that program.

Effective January 1990, APS implemented a three year follow-up testing program for APS employees who test positive for alcohol (first occurrence only). The follow-up testing program was expanded to include those individuals for whom "suitable inquiry" revealed a single confirmed positive drug or alcohol test three or more years prior to the date access was requested. Under this program, a total of 65 tests were administered during this reporting period. At the end of the reporting period, nine individuals were under the follow-up testing program based on the results of the "suitable inquiry". Of those nine individuals, two are APS employees and seven are contractors. No one under the follow-up testing program tested positive during this reporting period.

Other Testing:

2 Refusal to take test (contractor)

APS management action in each case of a confirmed positive test result or refusal was to remove the contractor from the site by revoking site access. Any individual who has had only one positive test is eligible to reapply after three years.

Challenges to the Fitness-for-Duty Program

A QA audit during early implementation of the program identified deficiencies in connection with the off-site laboratory. In order to correct these deficiencies, actions were taken to select a new off-site laboratory. However, problems with the reporting methods of this laboratory occurred, so additional action was taken to select another laboratory. Therefore, since June, Nichols Institute was selected as the primary laboratory with Smith Kline contracted as the backup laboratory.

APS had originally specified 300 ng/ml as the screening cut-off level for methamphetamines. Nichols advised us that it could not adopt that level because it uses a new monoclonal reagent specifically designed to detect methamphetamines and manufactured to calibrate to the DHHS screening cut-off of 1000 ng/ml. Both the manufacturer of the reagent (SYVA) and Nichols studied the problem and suggested that we could revise our cut-off level to 1000 ng/ml without compromising the program's effectiveness. Since the reagent contains two antibodies, one to detect methamphetamines at 1000 ng/ml and one to detect amphetamines at 300 ng/ml, we now specify those two screening cut-off levels.

APS learned that an off-site laboratory had erroneously reported that two specimens were positive for marijuana. This discovery was made when the Medical Review Officer (MRO) requested quantitative results from the lab in the course of preparing the semiannual report for the NRC. That information showed that the GC/MS (gas chromatography/mass spectrometry) results for two specimens had levels less than 15 ng/ml (the specified cut-off level for confirmatory tests) but had been reported to us as a positive. The individuals in question did not pursue the appeal process when notified that their tests were positive. APS has advised these individuals that their test results were negative and that our records had been corrected.

During the reporting period, no performance problems have been identified in connection with the blind performance specimens sent to any of the off-site laboratories which have been used by PVNGS.

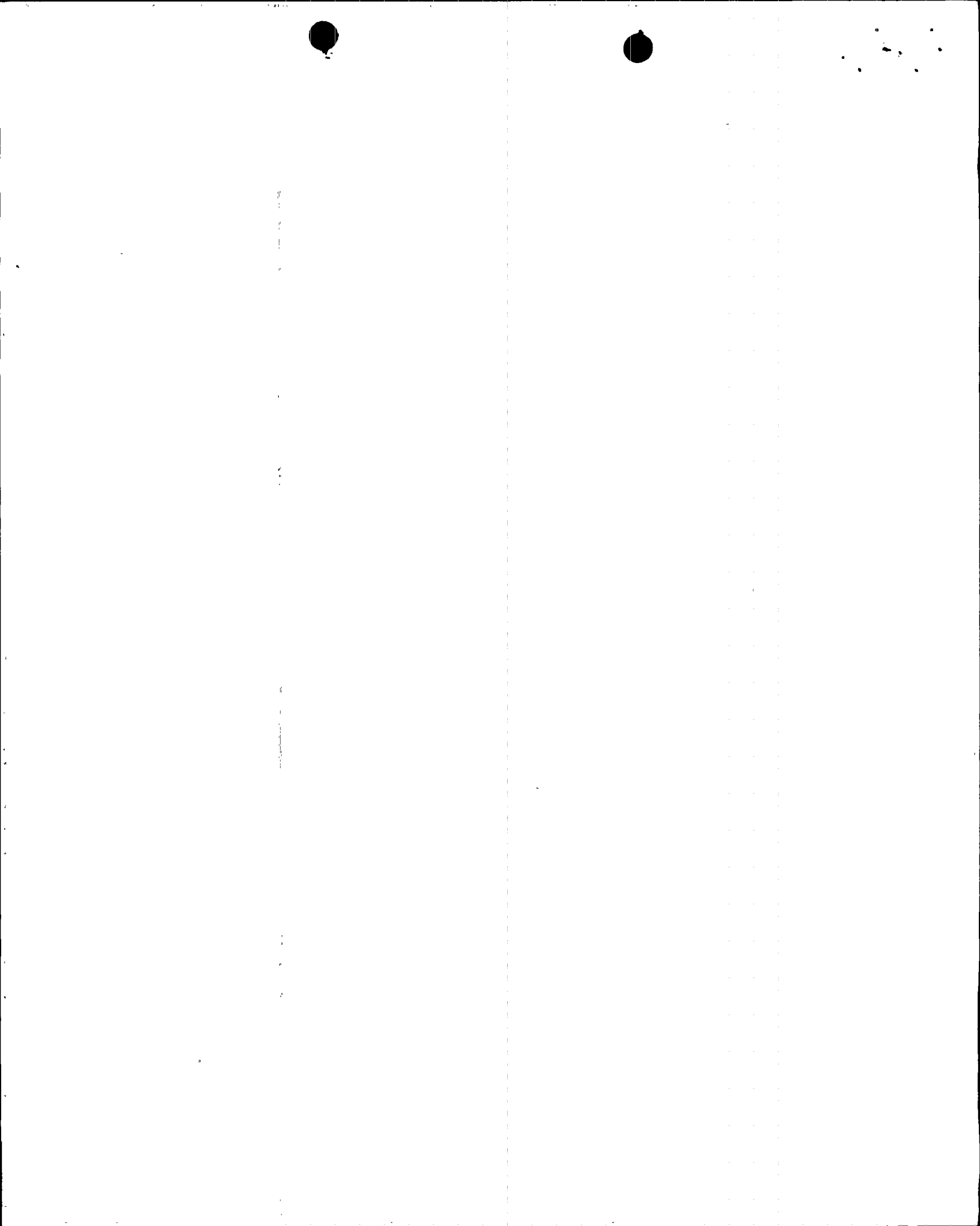
APS has learned that it is imperative to contract with an experienced laboratory which is large enough and flexible enough to handle our special needs. We are also convinced that reliance on a laboratory's certification by DHHS must be supplemented by close monitoring of laboratory performance.

Summary of Program Changes

Changes to the existing Fitness-for-Duty program have been made and are planned which, we believe, will improve the overall effectiveness of the program.

Completed Actions:

1. New procedures were developed to implement Part 26 and these procedures have been revised to further enhance the program.



FFD Program Performance Report
January through June, 1990
Page Four

2. Additional measures were taken to improve the security at the collection/testing facility located at the Palo Verde site.
3. Personnel changes have been made in the program administration to achieve closer supervision of the collection and testing area and to increase the level of regulatory/compliance experience within the group.
4. The annual requalification training for supervisors in behavioral observation has been placed on the Palo Verde computer based training system. This will help ensure consistent application of the training requirements.
5. A collection facility has been established in Phoenix to accommodate those individuals who are located at our corporate offices. This will facilitate testing of those individuals who have infrequent access to the protected area.

Planned Actions:

1. Chain of custody forms with bar coding will be added to the program within the next eight to ten weeks. This will help reduce the potential for human error in data entry at the lab.
2. APS is planning to provide a new brochure which will again inform our personnel about our Employee Assistance and Fitness-for-Duty Programs.

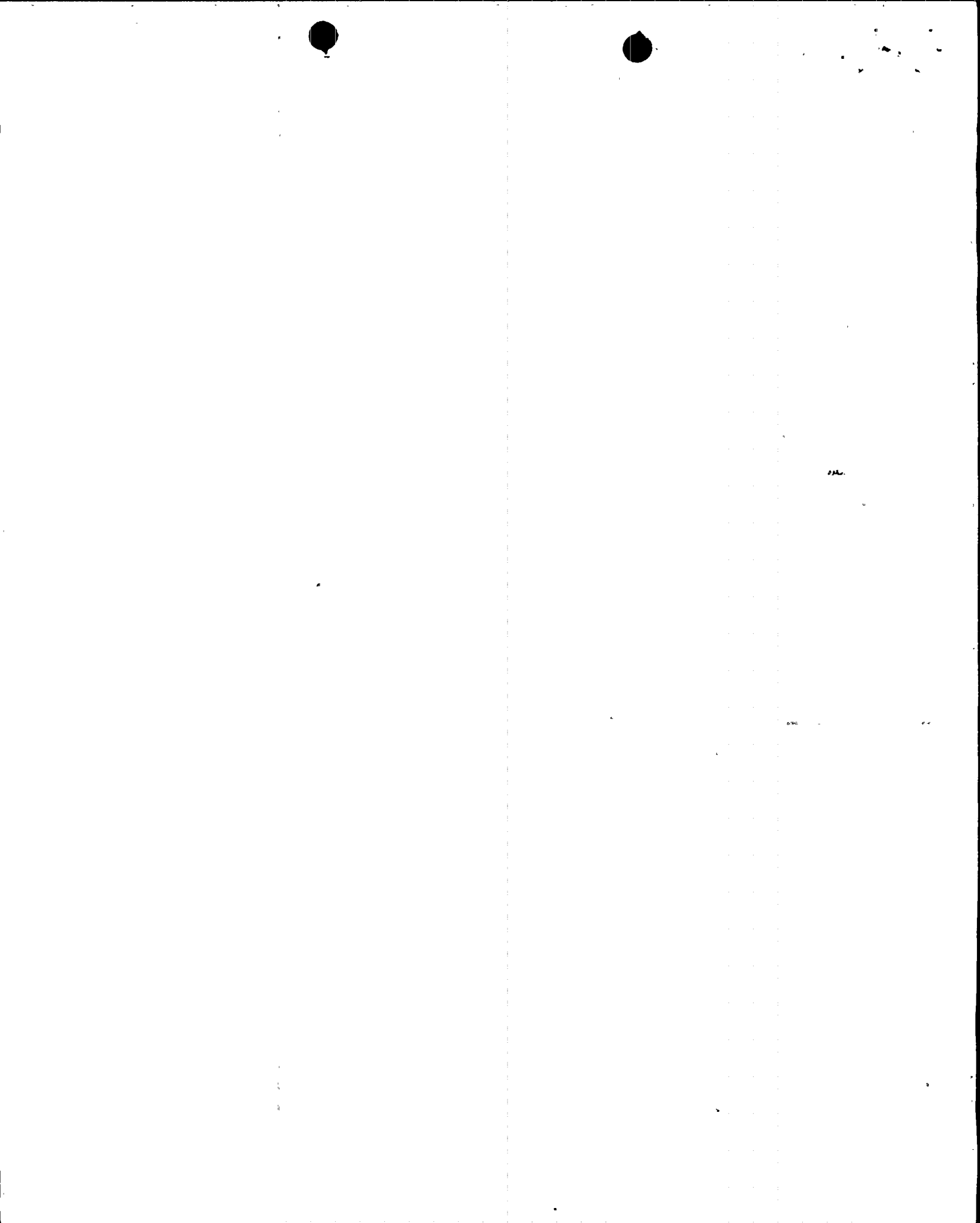
Conclusions

The first six months of our program show progress towards achieving a drug-free work place. The results of the drug testing program are showing evidence of this. Of the 2,042 individuals randomly tested, five individuals, all contractor personnel, had positive test results. A good communication effort was made prior to the implementation of the program, and efforts continue to educate employees about the Fitness-for-Duty policy.

Reportable Events

Events reported by phone to NRC: 1 Total

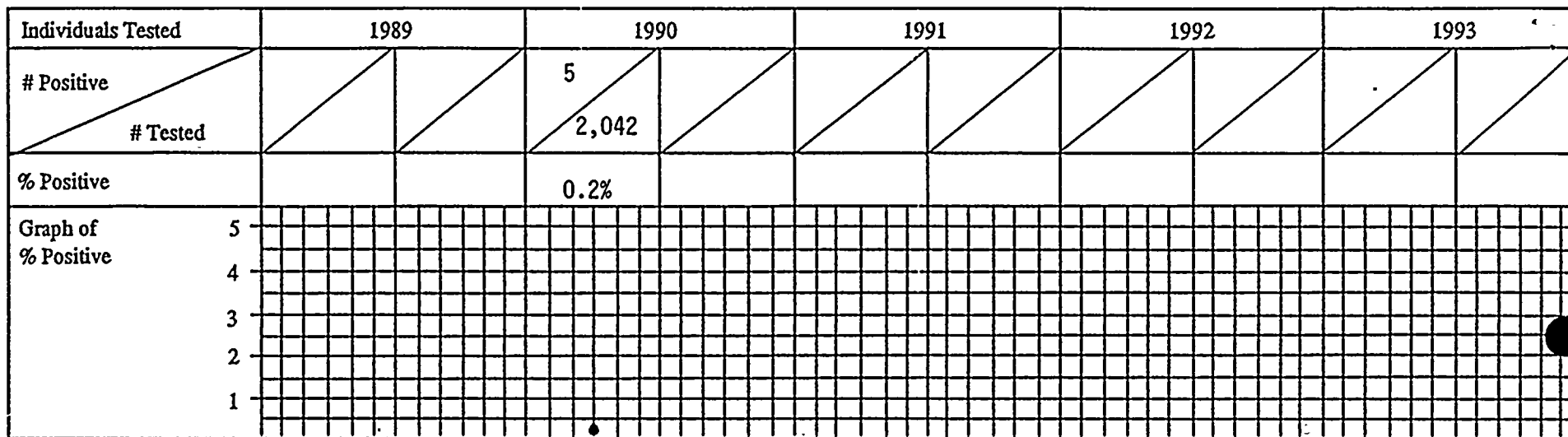
Summary of Event: On June 12, 1990, at 1832 hours, 5.51 grams of marijuana were found by a security investigator in a locker located in a trailer within the protected area of Unit II. The search of the locker was prompted by an anonymous call to security. The caller indicated he had seen the substance placed in the locker by a mechanic (contractor employee). As a result of the investigation the individual's site access to Palo Verde was terminated.



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

Arizona Public Service		June 30, 1990	
<small>Company</small>		<small>6 Months Ending</small>	
Palo Verde Nuclear Generating Station (PVNGS)			
<small>Location</small>			
Jeanne Robertson, FFD Administrator		(602) 393-7465	
<small>Contact Name</small>		<small>Phone (include area code)</small>	
<p>Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26</p> <p>Marijuana 20 / 15 Amphetamine 300 / 300 Benzodiazepines 300 / 300</p> <p>Cocaine 300 / 150 Methamphetamines 1000 / 300 Barbiturates 300 / 300</p> <p>Opiates 300 / 300 Phencyclidine 25 / 25 Alcohol (% of BAC) .04%</p>			

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access	2,234				N/A		1,546	
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-badging	175	0			N/A	N/A	1,520	18*
For cause	3	0			N/A	N/A	14	1
Post accident	0	0			N/A	N/A	1	0
Random	1,202	0			N/A	N/A	840	5
Follow-up	57	0			N/A	N/A	8	0
Other (Refusal)	0	0			N/A	N/A	2	2
Total	1,437	0			N/A	N/A	2,385	26



Confirmed Positive Tests for Specific Substances

[illegible]

Note: The results reported with the / indicate, on the left, the number of tests which would have been reported as positive using the NRC cut-off level, while the number on the right indicates the positive results using the APS cut-off level.

* APS uses different cut-off levels than the NRC for several drugs. If the NRC screening cut-off level (100 ng/ml) for marijuana had been used in the testing program instead of the APS cut-off level (20 ng/ml), five individuals would not have tested positive for marijuana.

** One pre-badge individual tested positive for two substances, marijuana and cocaine.

