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 AUTH. NAME AUTHOR AFFILIATION
 LEVINE, J.M. Arizona Public Service Co. (formerly Arizona Nuclear Power I
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 rept for Jul-Dec 1992. D

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PALO VERDE NUCLEAR GENERATING STATION
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JAMES M. LEVINE
VICE PRESIDENT
NUCLEAR PRODUCTION

102-02425-JML/TRB/GEC
February 24, 1993

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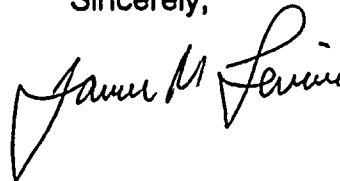
Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Fitness-for-Duty Program Semiannual Performance Report
File: 93-056-026; 93-001-703

Arizona Public Service Company hereby provides, as an enclosure to this letter, the Fitness-for-Duty Program Semiannual Performance Report for the reporting period of July 1992 through December 1992.

Please call Thomas R. Bradish at (602) 393-5421 with any questions.

Sincerely,



JML/TRB/GEC/gec

Enclosure

cc: J. B. Martin (all w/enclosure)
L. L. Bush
J. A. Sloan

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ENCLOSURE

ARIZONA PUBLIC SERVICE COMPANY

**FITNESS-FOR-DUTY PROGRAM
SEMIANNUAL PERFORMANCE REPORT**

JULY 1992 THROUGH DECEMBER 1992

ARIZONA PUBLIC SERVICE COMPANY

FITNESS-FOR-DUTY PROGRAM SEMIANNUAL PERFORMANCE REPORT

JULY 1992 THROUGH DECEMBER 1992

Introduction

The Arizona Public Service Company (APS) Fitness-for-Duty (FFD) Program continues to demonstrate success in its endeavor to maintain a drug-free workplace. During this reporting period, APS performed 3,109 drug and alcohol tests, 1,961 of which were administered on a random basis. This constituted an equivalent annual random testing rate of 124%.

The percentage of confirmed positive random drug and alcohol tests was approximately the same as in the previous reporting period. Of the 1,961 random drug and alcohol tests conducted during this reporting period, APS attained a confirmed positive rate of 0.20%. The confirmed positive rate for calendar year 1992 was 0.19%. APS attributes the low confirmed positive rate to its continuous efforts in the area of awareness training and communications.

Analysis of Program Results

The confirmed positive drug test results for this reporting period by type of test and type of drug are summarized in Tables 1 and 2, respectively, and are discussed as follows:

Pre-Access Testing:

Marijuana	10*
Cocaine	1*
Alcohol	<u>2</u>

Total: 13 confirmed positive test results involving 12 individuals

* One individual registered a confirmed positive test for both cocaine and marijuana.

Comments: A total of 1,060 individuals were tested during pre-access screening. All individuals registering confirmed positive tests were short-term contractor personnel.

For-Cause Testing (including observed behavior and post accident):

Marijuana	2*
Alcohol	<u>2</u> *

Total: 4 confirmed positive test results involving 3 individuals

* One individual registered a confirmed positive test for both alcohol and marijuana.

Comments: APS tested 44 individuals within the observed behavior category, and eight individuals within the post accident category. Observed behavior included suspected adulteration of urine specimens, odor of alcohol on individuals, and behavioral observations. One individual registered confirmed positive test results for both alcohol and marijuana. All three of the individuals registering confirmed positive tests were short-term contractor personnel. The eight individuals tested within the post accident category registered negative test results.

Random Testing:

Marijuana	3
Cocaine	<u>1</u>

Total: 4 confirmed positive test results

Comments: APS tested 1,961 individuals who were randomly selected for drug and alcohol testing during this reporting period. This constituted an equivalent annual random testing rate of 124%. Of the four individuals who registered a confirmed positive test result, three were APS employees and one was a short-term contractor.

Follow-Up Testing:

Marijuana	1
Amphetamines	<u>1</u>

Total: 2 confirmed positive test results

Comments: A total of 35 tests were performed under the APS Follow-Up Testing Program during this reporting period. At the end of this reporting period, three individuals were being monitored within the Follow-Up Testing Program. Two individuals are in the program as a result of a confirmed positive alcohol test and

one as the result of suitable inquiry. Two individuals in the program are APS employees and one is a short-term contractor. Of the two individuals who registered confirmed positive test results, one was an APS employee and the other was a short-term contractor.

Other Testing:

Comments: One individual was tested within this category due to a positive test for opiates. The Medical Review Officer (MRO) determined that the positive test was related to poppy seed consumption. The APS policy requires "poppy seed positives" to refrain from consuming poppy seeds for ten days. During that ten-day period, the individual is required to submit to drug and alcohol testing. The individual was tested on the tenth day and test results were negative.

No actions are taken by APS based on presumptive positives until confirmed by the MRO. In each case of a confirmed positive (illegal) drug test result, an APS employee's protected area access and site access are terminated. APS employees who register a confirmed positive test result for illegal drugs are discharged from employment. APS employees who experience a single occurrence with a confirmed positive test for alcohol receive a disciplinary suspension, evaluation, and treatment prior to reinstatement of unescorted protected area access. In addition, these individuals are placed in a one-year follow-up testing program. Contractor personnel who register a confirmed positive test result for illegal drugs or alcohol have their protected area and site access terminated.

Program Review

As discussed in the previous Semiannual Performance Report, APS implemented a communication program as an effort to enhance employees' awareness of drug and alcohol addiction and abuse. Fitness-for-Duty/Employee Assistance Program newsletters were published and articles regarding program requirements were included in the PVNGS newsletter. Last October, APS held a Drug Awareness Fair during Red Ribbon Week.

One individual appealed a test determination during this reporting period. The Appeals Board reviewed the relevant material and upheld the original determination.

One performance test specimen (certified by the vendor to be positive) was reported negative by the APS primary Department of Health and Human Services (DHHS) certified laboratory. Specimen processing was reviewed and no discrepancies in the preparation were identified. The type of drug used to spike the specimen has a tendency to be unstable and this may have contributed to a deterioration of the specimen. In addition, another specimen adulterated with the same drug was submitted to the DHHS certified laboratory. Test results for this specimen were consistent with the vendor's data sheet.

Due to changes in assay levels, APS elected to lower the cut-off levels of Benzodiazepines and Barbiturates from 300 ng/ml to 200 ng/ml. During this period, there was a miscommunication between the primary DHHS certified laboratory and APS. The laboratory continued to screen at 300 ng/ml, but did confirm at 200 ng/ml. Upon discovery, APS discontinued using the primary laboratory and referred specimens to the back-up DHHS certified laboratory. The back-up laboratory performed screening at the 200 ng/ml level for both drugs. The primary laboratory subsequently established procedures permitting Benzodiazepines and Barbiturates to be screened at the 200 ng/ml level during January 1993.

On January 4, 1993, it was noted that Fitness-for-Duty personnel failed to provide a drug and alcohol testing result to the MRO within the required time frame. As a result, the MRO was unable to make a determination within the ten-day time frame required by 10 CFR Part 26. The MRO subsequently determined the test to be negative. The delay was the result of inattention to detail by a collection technician, and appropriate corrective actions have been implemented.

During this reporting period, the existing MRO contract was nearing its expiration and APS contracted with a new physician to perform MRO duties. APS continues to contract with a local hospital for back-up MRO services.

Reportable Events

On July 6, 1992, an APS Supervisor registered a confirmed positive test for cocaine. The individual had been randomly selected for drug and alcohol testing. An investigation was conducted jointly by the APS Corporate Security investigators assigned to PVNGS and the Fitness-for-Duty Supervisor. As a result of the investigation, the individual's access to the protected area and to the site, as well as employment, were terminated. The individual did not appeal the decision.

Planned Actions

The APS Fitness-for-Duty section is in the process of revising procedures to incorporate changes allowing for Integrated Nuclear Data Exchange (INDEX) affiliation. These procedure changes will allow waiver of the requirement for pre-employment drug screening for individuals who have been in an approved Fitness-for-Duty program that meets the requirements of 10 CFR Part 26, verified by information provided through the INDEX program.

Fitness-for-Duty Technicians and Medical Department personnel are currently undergoing cross-training to ensure back-up support for each section.

Table 1

Fitness-For-Duty Program

Performance Data

Personnel Subject to 10 CFR Part 26

Fitness for Duty Program Performance Data Personnel Subject to 10CRF26

Arizona Public Service Company (APS)	December 31, 1992
Company	6 months ending
Palo Verde Nuclear Generating Station	
Location	
Mary Maddix/David Heler	(602) 393-7393
Contact Name	Phone(include area code)

Cutoffs: Screen/Confirmation (ng/ml) ☐ Appendix A to 10CFR 26

Marijuana	20/15	Amphetamines	300 / 300	Benzodiazepines	200/ 200
Cocaine	300/150	Phencyclidine	25 / 25	Barbiturates	200/ 200
Opiates	300/300	Alcohol (% BAC)	0.04		

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		2481		N/A		674	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		121	0	N/A	N/A	939	12
For Cause	Post accident	3	0	N/A	N/A	5	0
	Observed behavior	26	0	N/A	N/A	18	3
Random		1567	3	N/A	N/A	394	1
Follow-up		25	1	N/A	N/A	10	1
Other		1	0	N/A	N/A	0	0
Total		1743	4	N/A	N/A	1366	17

Table 2

Breakdown of

Confirmed Positive Tests for

Specific Substances

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to Test	Benzodiazepines	Barbiturates	3	4	5	
Licensee Employees	3	1	0	0	0	0	0	0	0				
Long-Term Contractors	0	0	0	0	0	0	0	0	0				
Short-Term Contractors	13	1	0	1	0	4	0	0	0				A
Total	11*/16**	2**	0	1	0	4**	0	0	0				18*/23**

NOTES:

- * For those results reported in a split box, the number on the left side records the number of confirmed positive tests reported on the basis of the NRC cut-off level, while the number on the right side records the number of confirmed positive tests reported on the basis of the more restrictive APS cut-off level.
- ** Two individuals tested positive for two drugs (cocaine and marijuana in one case, and alcohol and marijuana in the other).

