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**Arizona Public Service Company**

PALO VERDE NUCLEAR GENERATING STATION  
P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

10 CFR 26.71(d)

102-02850-AKK/RAB/GEC

March 1, 1994

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Washington, DC 20555

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: 94-056-026; 94-001-703**

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 1993 through December 1993.

Should you have any questions, please contact Angela K. Krainik at (602) 393-5421.

Sincerely,

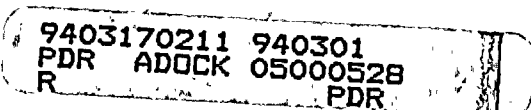


Angela K. Krainik  
Manager, Nuclear Licensing

AKK/RAB/GEC/dd

Enclosure

cc: W. F. Conway (all w/enclosure)  
K. E. Perkins, Jr.  
L. L. Bush  
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AD21



**ENCLOSURE**

**ARIZONA PUBLIC SERVICE COMPANY**

**FITNESS-FOR-DUTY PROGRAM**

**SEMIANNUAL PERFORMANCE REPORT**

**JULY 1993 THROUGH DECEMBER 1993**



## Introduction

The Arizona Public Service Company (APS) Fitness-for-Duty (FFD) Program continues to demonstrate success in its mission to maintain a drug-free workplace. During the reporting period, APS performed 3,116 drug and alcohol tests. Of these tests, 1,850 were administered on a random basis. This constitutes an equivalent annual random testing rate of approximately 106 percent.

The percentage of confirmed positive random drug and alcohol tests for the reporting period was 0.16 percent; this was lower than the previous reporting period. The confirmed positive rate for calendar year 1993 was 0.21 percent. APS attributes this low confirmed positive rate to the continuous and ongoing 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 below:

### Pre-Access Testing:

|                 |            |
|-----------------|------------|
| Cocaine         | 2          |
| Marijuana       | 12*        |
| Alcohol         | 3**        |
| Amphetamines    | 3*         |
| Refusal to Test | <u>1**</u> |

Total: 21 confirmed positive test results involving 18 individuals.

\* Two individuals tested positive for more than one substance.

\*\* One individual tested positive for alcohol and refused to complete drug screening.

Comments: An individual undergoing pre-access testing registered a positive test for alcohol and refused to submit to any further testing. Site access was revoked, and the individual was returned to the responsible site representative. A total of 1,178 individuals were tested during pre-access screening. All of the individuals who registered a positive test were within the category of short-term contract personnel who were applying for access to the Protected Area. In all cases, access to the site and Protected Area was denied.





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

|                 |          |
|-----------------|----------|
| Marijuana       | 3*       |
| Alcohol         | 4*       |
| Refusal to Test | <u>2</u> |

Total: 9 confirmed positive test results involving 8 individuals.

\* One individual tested positive for more than one substance.

Comments: Two contractor personnel were asked to submit to For Cause testing as a result of unusual behavior observed by management. Both individuals refused to submit to testing. Each individuals had previously been granted site access and one had previously been granted Protected Area access. Protected Area and site access were revoked, as applicable, and each individual was directed to return to their responsible site representative. APS tested 46 individuals within the observed behavior category during this reporting period. No individuals were tested within the post accident category during this reporting period. Reasons for testing included: suspected adulteration of urine specimens and odor of alcohol on individuals. One individual who registered a positive test result was an APS employee, and the remaining six individuals were short-term contractor personnel.

Random Testing:

|              |          |
|--------------|----------|
| Marijuana    | 1        |
| Cocaine      | 1        |
| Amphetamines | <u>1</u> |

Total: 3 confirmed positive test results.

Comments: APS tested 1,850 individuals who were randomly selected for drug and alcohol testing during this reporting period. This constituted an equivalent annual random testing rate slightly in excess of 106 percent. Of the three individuals who registered a positive test result, one was an APS employee and two were short-term contractor personnel.

Follow-Up Testing:

A total of 39 tests were performed as part of the APS Follow-Up Testing Program during this reporting period; all tests were negative. At the end of the reporting period, four individuals were being monitored by the Follow-Up Testing Program.



### Other Testing:

Three individuals were tested within this category due to a positive test for opiates. The Medical Review Officer (MRO) determined that the positive test results were related to poppy seed consumption. The APS policy requires that an individual, who is suspected of testing positive due to poppy seed consumption, refrain from consuming poppy seeds for ten days. During the ten-day period, the individual is required to submit to drug and alcohol testing. In the instances cited, the individuals were tested within the ten-day period and test results were negative.

### Program Review

APS is continuing its communication effort to enhance employee's awareness of the FFD Program and the Employee Assistance Program. Initial and requalification Continuous Behavior Observation Training have been revised. The primary effect of the revision was to place stronger emphasis on the FFD requirements and on aberrant behaviors not related to drug and alcohol use.

### Reportable Events

On October 14, 1993, a contractor Supervisor registered a confirmed positive test for alcohol. Testing had been performed within the For Cause testing category. An investigation was conducted jointly by APS Corporate Security investigators assigned to PVNGS, and the FFD Supervisor. As a result of the investigation, the individual's Protected Area and site access were revoked and the individual was returned to the responsible site representative.

Personnel in the FFD, Quality Assurance (QA), Computer Services, and Security Access Control-Badging organizations have continued to identify discrepancies between the data bases used by Security and the FFD Program. These discrepancies are summarized in the Attachment. The following root causes for the discrepancies have been identified:

Human performance errors, including failure to enter information into the data bases correctly and lack of understanding of computer requirements.

System errors in the logic of the computer code(s) used by FFD and Security.

Failure to evaluate properly the effects of changes in work processes on associated systems.

Ineffective corrective actions following earlier identification of program problems.



APS believes that the identified problems have been resolved and corrective actions taken will prevent the repetition of programmatic errors in the future. In addition to the actions taken, APS has begun developing an enhanced computer system and processes that will integrate the various systems to more fully automate the random selection process, thus reducing the potential for human error.

#### Planned Actions

A task force consisting of responsible personnel from the FFD, QA, Security, and Computer Services organizations has been established to develop action plans to implement a permanent resolution to reconciliation of the Security and FFD data bases. In the interim, Security Access Control-Badging performs daily comparisons of the Security and FFD databases, and any identified discrepancies are immediately corrected.



**Table 1**

**Fitness-For-Duty Program**

**Performance Data**

**Personnel Subject to 10 CFR Part 26**





# Fitness for Duty Program Performance Data Personnel Subject to 10 CRF 26

|  |  |
|--|--|
| <b>Arizona Public Service Company (APS)</b>          | <b>December 31, 1993</b>                 |
| <small>Company</small>                               | <small>6 months ending</small>           |
| <b>Palo Verde Nuclear Generating Station (PVNGS)</b> |  |
| <small>Location</small>                              |  |
| <b>David N. Heler / Mary F. Maddix</b>               | <b>(602) 393-7465</b>                    |
| <small>Contact Name</small>                          | <small>Phone (include area code)</small> |

Cutoffs: Screen/Confirmation (ng/ml)    ☐ Appendix A to 10 CFR 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 |                   | 2523               |            |                                |            | 956                             |            |
| Categories                            |                   | # Tested           | # Positive | # Tested                       | # Positive | # Tested                        | # Positive |
| Pre-Access                            |                   | 86                 | 0          |                                |            | 1092                            | 18         |
| For Cause                             | Post accident     | 0                  | 0          |                                |            | 0                               | 0          |
|                                       | Observed behavior | 19                 | 1          |                                |            | 27                              | 7          |
| Random                                |                   | 1408               | 1          |                                |            | 442                             | 2          |
| Follow-up                             |                   | 10                 | 0          |                                |            | 29                              | 0          |
| Other                                 |                   | 2                  | 0          |                                |            | 1                               | 0          |
| Total                                 |                   | 1525               | 2          |                                |            | 1591                            | 27         |



**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 | Total | 4 | 5 |
|------------------------|-----------|---------|---------|--------------|---------------|---------|-----------------|-----------------|--------------|-------|---|---|
| Licensee Employees     | 1         | 1       | 0       | 0            | 0             | 0       | 0               | 0               | 0            | 2     |   |   |
| Long-Term Contractors  | 0         | 0       | 0       | 0            | 0             | 0       | 0               | 0               | 0            | 0     |   |   |
| Short-Term Contractors | 15        | 2       | 0       | 4            | 0             | 7       | 3               | 0               | 0            | 31    |   |   |
| Total                  | 16        | 3       | 0       | 4            | 0             | 7       | 3               | 0               | 0            | 33    |   |   |

A

Two  
individuals  
tested  
positive for  
more than  
one drug.

One  
individual  
tested  
positive for  
more than  
one drug.

One  
individual  
tested  
above the  
cutoff for  
alcohol and  
refused to  
complete  
drug  
screening.

Sixteen Marijuana screenings were positive during this reporting period using a 100ng cutoff level; sixteen were also positive using a 20ng cutoff level.



**ATTACHMENT**

**IDENTIFIED DISCREPANCIES**





Under the present system, when an individual is granted unescorted access to the PVNGS protected area, his or her name and pertinent information are entered into the Security Department's personal computer-based AUTO-ACAD database. The information from that database is uploaded to the corporate database mainframe computer each afternoon. This enables the mainframe database to reflect ACADs granted, suspended, or revoked that day. The next day, the corporate database is sorted by Social Security number; and the numbers with active ACADs are copied into the ACAD data set which the FFD program uses for selecting persons to be tested if a matching Social Security number is found in the master FFD data set.

APS has identified the following instances in which individuals who held unescorted access to the Protected Area at PVNGS were not subjected to random selection for FFD testing:

- 1) On September 30, 1993, a failure occurred while the Security Department's AUTO-ACAD system was running, uploading information to the corporate mainframe. The uploading process stopped before it was completed. As a result, 1440 individuals were improperly dropped from the corporate database, and therefore, were eliminated from the data set from which the FFD program selects personnel for random testing. FFD personnel identified the large drop in the testing data set on October 1. The data processing error was corrected and information successfully uploaded into the corporate mainframe and then to the FFD program on October 1. The 1440 persons were, therefore, ineligible for random selection for a single day. A random selection was actually made and people were tested from the abbreviated list on October 1.
- 2) A QA audit in October 1993 confirmed discrepancies between the number of individuals listed in the corporate database and the number listed in the AUTO-ACAD database. This discovery led to further investigations, which revealed the following instances in which an individual to whom access was newly granted or re-established was not added to the FFD testing database.
  - a) On September 13, 1993, ACAD 7342 was issued. This new ACAD was activated in the Security Access computer by the Central Alarm Station; thus permitting it to be used by the holder. However, the new ACAD was not activated in the Security AUTO-ACAD system due to a Human Performance Event, was not uploaded to the corporate database, and was not copied into the FFD testing ACAD database. The deficiency was identified on October 14, 1993, and the individual was added to the random testing pool on October 15, 1993. Thus, the individual was not eligible for random testing from September 13 through October 14, 1993.
  - b) A security officer (contractor employee) was issued an ACAD on May 26, 1993, in part, on the basis of drug testing results at another NRC-licensed



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facility which were transferred through a record transfer. The individual was not subject to a pre-badging FFD test at PVNGS; and therefore, the FFD master data set did not list this individual; so no match of Social Security numbers could be made. The individual was reported as an exception by the FFD database, and FFD personnel failed to recognize the significance of the exception. The error was identified on October 18, 1993, and the individual was added to the random pool on that date. The individual was ineligible for random testing from May 26 to October 18, 1993.

- c) A Security Officer's (contractor employee) ACAD was incorrectly expired by Security Badging on April 8, 1993, and the individual was removed from the FFD database. This error was identified on July 30, 1993, and the individual's access was suspended. Upon returning to work on August 3, the individual was subjected to FFD testing, and access was reinstated on August 5, 1993.
- 3) An individual who is employed in Emergency Fire Protection held two ACADs (a normally issued ACAD and an ACAD to facilitate rapid entrance during an emergency). One of the ACADs was defective and was terminated on December 28, 1992, and a replacement ACAD was issued at that time. The other ACAD continued to be valid. The FFD database failed to recognize that a valid ACAD existed, and the individual was eliminated from the testing pool on December 28, 1992. The error was identified on October 26, 1993, and the individual's name was restored to the FFD database. The individual was not eligible for random testing between December 28, 1992 and October 26, 1993.

