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 Rept for 940701-1231.

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**Arizona Public Service Company**

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

102-03264-AKK/SAB/PMM

March 1, 1995

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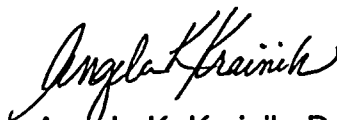
Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)**  
**Units 1, 2, & 3**  
**Docket Nos. STN 50-528/529/530**  
**Fitness-For-Duty Program Semiannual Performance Report**  
**File: 95-056-026; 95-001-703**

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 1994 through December 1994.

Should you have any questions, please contact Scott A. Bauer at (602) 393-5978.

Sincerely,



Angela K. Krainik, Department Leader  
Nuclear Regulatory Affairs

AKK/SAB/PMM/pm

Enclosure

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**ENCLOSURE**

**ARIZONA PUBLIC SERVICE COMPANY**

**FITNESS-FOR-DUTY PROGRAM**

**SEMIANNUAL PERFORMANCE REPORT**

**JULY 1, 1994 THROUGH DECEMBER 31, 1994**





## Introduction

The Arizona Public Service Company (APS) Fitness-for-Duty (FFD) Program continues to be successful in its mission to maintain a drug-free workplace. During this reporting period, APS performed 1376 drug and alcohol tests. Of these, 734 were administered on a random basis. This constitutes an equivalent random testing rate of 52 percent for this reporting period and an annual rate of 57 percent.

The percentage of confirmed positive random drug and alcohol tests for this reporting period is 0.10 percent. The percentage of confirmed positive tests for the year remains at 0.2 percent. APS continues to attribute its success in achieving this low positive rate to a strong Employee Assistance Program (EAP) and awareness training.

## 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:**

Marijuana	3*
Cocaine	1*
Amphetamine	4*
Alcohol	<u>4</u>

Total: 12 confirmed positive test results involving 9 individuals

\* Two individuals registered a confirmed positive test result for both marijuana and amphetamines. One individual registered a confirmed positive test result for both cocaine and amphetamines.

Comments: A total of 598 individuals were tested under the pre-access screening category. All nine individuals who registered positive test results were short-term contractors. These individuals were denied site access and released to their respective employer.

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

Alcohol	<u>1</u>
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Total: 1 confirmed positive test result

Comments: APS tested a total of 25 individuals within the For Cause Testing category during this reporting period. A total of 19 tests were conducted under the observed behavior category. Reasons for testing included: behavior observation, suspected adulteration of specimens, and an odor of alcohol on individuals. Six tests were done under the Post-Accident category: All Post-Accident testing results were negative. The one individual registering a positive test result was a short-term contractor.



## **Random Testing:**

Cocaine            1

Total:            1 confirmed positive test result

Comments: APS tested 734 individuals who were randomly selected for drug and alcohol testing during this reporting period. This constituted a 52 percent testing rate for this reporting period and a 57 percent annual testing rate. The individual who registered the positive test result was an APS employee. This individual's protected area access and employment was terminated.

## **Follow-up Testing:**

Comments: A total of 16 tests were performed as part of the APS Follow-Up Testing Program. None of the individuals tested in this category registered a positive test result. One APS employee was terminated for failure to comply with a treatment program recommended by the APS Employee Assistance Counselor. This employee's follow-up drug and alcohol tests were negative; therefore, for recordkeeping purposes, the termination was classified under the category of Other (see Table 1). Currently, four individuals are being monitored through the Follow-Up Testing Program.

## **Other Testing:**

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

No actions are taken by APS based on presumptive positive test results until confirmed by the certified laboratory and reviewed by the MRO. In each case of a confirmed positive drug test result for illegal drugs, an APS employee's protected area access and employment is terminated. APS employees who register a positive alcohol test result for the first time receive a disciplinary suspension, evaluation, and treatment prior to reinstatement of protected area access. In addition, the individuals are placed in a Follow-Up Program. Contractor personnel who register a confirmed positive test result for illegal drugs or alcohol have their protected area access and site access terminated.

## **Program Review**

FFD began utilizing the AUTO-ACAD system to ensure accuracy of the Random Pool in July 1994. Initially, FFD utilized the Security AUTO-ACAD system concurrently with the Security Access Control-Badging database until all administrative concerns were addressed. In September 1994, FFD began processing random selections utilizing the AUTO-ACAD system solely. The AUTO-ACAD system has proven to be accurate, and no individuals have dropped out of the random pool.



Three individuals appealed their test determination during this reporting period. The Appeals Board reviewed the relevant data and upheld the original determination in all cases.

### **Reportable Events**

APS has not experienced any Reportable Events during this reporting period. The licensed operator who registered a positive test result during the first reporting period has successfully completed all EAP recommendations. The individual continues to be monitored through the Follow-up Program. This individual has been re-evaluated and evaluation results are in favor of returning the individual to licensed duties. The individual has started the reinstatement process.

### **Planned Actions**

During this reporting process, a Reengineering Team was formed to review and evaluate work processes associated with Health Service's function. FFD processes were closely scrutinized and compared to "best practice" utilities. Proposals for revising the program were submitted and reviewed by management. The approved revisions for FFD include the following:

- Marijuana screening levels will be changed from 20 ng/ml to 50 ng/ml.
- Individuals registering a positive test result for alcohol will result in a mandatory referral to EAP. Individuals will be required to comply with EAP recommendations and will be monitored through the Follow-up Program for one year. The individual's protected area access will be suspended pending evaluation.
- Individuals registering a positive test result for illegal drugs for the first time will receive a 14-day suspension from the site and protected area. During this period, the individual will be required to submit to an EAP evaluation. The individual will be required to comply with EAP recommendations and will be monitored through the Follow-up Program for three years. A second offense for illegal drugs will result in termination. Contractors registering a positive test result for either alcohol or illegal drugs for the first offense will have their protected area access and site access terminated.
- Currently, the APS drug panel includes benzodiazepines and barbiturates. Since the implementation of 10 CFR Part 26, laboratory positive test results for either benzodiazepines or barbiturates have been minimal. The MRO reviews and interviews individuals registering a positive test on all drugs. APS has not experienced one MRO positive test result for either benzodiazepines or barbiturates. Therefore, benzodiazepines and barbiturates will be deleted from the drug panel.

The target date for implementation of the above is March 1, 1995. The revisions are being made in recognition of the low positive testing rates observed to date. The revisions do not reduce APS' commitment and goal of a drug-free work environment. The changes are consistent and in compliance with the regulations and will be monitored to determine any adverse affect.



**Table 1**

**Fitness-For-Duty Program**

**Performance Data**

**Personnel Subject to 10 CFR Part 26**





# Fitness for Duty Program Performance Data Personnel Subject to 10CFR26

<b>Arizona Public Service Company (APS)</b>	<b>December 31, 1994</b>
Company	6 months ending
<b>Palo Verde Nuclear Generating Station (PVNGS)</b>	
Location	
<b>Mary F. Maddix</b>	<b>(602) 393-7465</b>
Contact Name	Phone (include area code)

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

Marijuana	20 / 15	Amphetamines	1000 / 500	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		2,400		0		450	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		100	0	0	0	498	9
For Cause	Post accident	5	0	0	0	1	0
	Observed Behavior	9	0	0	0	10	1
Random		633	1	0	0	101	0
Follow-up		9	0	0	0	7	0
Other		2	1	0	0	1	0
TOTAL		758	2	0	0	618	10



**Table 2**

**Breakdown of**

**Confirmed Positive Tests for**

**Specific Substances**



## Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to Test	Benzodiazepines	Barbiturates	Total	4	5
Licensee Employees	0	1	0	0	0	0	0	0	0	1		
Long-Term Contractors	0	0	0	0	0	0	0	0	0	0		
Short-Term Contractors	3*	1*	0	4*	0	5	0	0	0	13		
Total	3	2	0	4*	0	5	0	0	0	14		

A

COMMENTS: \* Three individuals tested positive for more than one drug.

One individual was terminated for failure to comply with EAP recommendations.

6 specimens screened positive for THC at both the 20ng/ml & 100ng/ml cut-off levels.

