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STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530

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SUBJECT: Forwards fitness-for-duty program semi-annual performance
rept for period of 970101-0630.

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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)

102-04002 -AKK/SAB/CJJ
August 29, 1997

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-37
Washington, DC 20555-0001

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**

Pursuant to 10 CFR 26.71(d), 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 January 1, 1997 through June 30, 1997.

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

Sincerely,



Angela K. Krainik
Department Leader,
Nuclear Regulatory Affairs

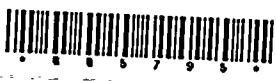
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Enclosure

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ENCLOSURE

ARIZONA PUBLIC SERVICE COMPANY

FITNESS-FOR-DUTY PROGRAM

SEMIANNUAL PERFORMANCE REPORT

JANUARY 1, 1997 THROUGH JUNE 30, 1997

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 1161 tests. Of these, 622 were administered on a random basis. This constitutes an equivalent testing rate of 51 percent for this reporting period.

The percentage of confirmed positive random drug and alcohol tests for this reporting period is 0.3 percent.

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 Table 1 and 2 respectively, and are discussed below.

Pre-Access Testing:

Marijuana	<u>1</u>	
Total	1	confirmed positive test result involving one individual

Comments: APS tested a total of 506 individuals under the Pre-Access Testing category during this reporting period. The one individual who registered a positive test result was a short-term contractor. The individual was denied site access and released to his respective employer.

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

Comments: APS tested a total of 15 individuals under the For Cause Testing category during this reporting period. For Cause testing includes: behavior observation, suspected adulteration of specimens, and an odor of alcoholic beverage on individuals. No positive test results were registered under this category.

Random Testing:

Marijuana	1	
Cocaine	<u>1</u>	
Total	2	confirmed positives involving 2 individuals

Comments: APS tested a total of 622 individuals under the Random Testing category during this reporting period. This constituted a 51 percent testing rate. The individual who registered a positive test for marijuana was an APS employee. The employee's unescorted access was revoked and the employee was referred to the Employee's Assistance Program (EAP) for evaluation and treatment. The employee is currently in the Follow-Up Program and will continue in this program for three years. The other individual who registered a positive cocaine test result was a short-term contractor. Site access was denied and the individual was released to his respective employer.

Follow-Up Testing:

Comments: APS conducted a total of 17 tests that were performed as part of the APS Follow-Up Testing Program during this reporting period. No positive test results were registered under this category.

Other Testing:

Comments: One individual was 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 foods containing poppy seeds for ten days. During the ten days, the individual is required to submit to drug and alcohol testing. In the above incident, the individual was tested within the ten days and test results were negative.

Reportable Events

APS has not experienced any Reportable Events during this reporting period.

Program Review

In the last semi-annual report, Palo Verde reported that the FFD data base had inadvertently switched from a composite random sampling (CRS) pool for random selections to a simple random sampling (SRS). Investigation revealed that the switch was a result of a software upgrade by the vendor. The problem has been rectified and Palo Verde's random pool has returned to a composite random sampling.

On April 24, 1997, a FFD technician began the process used to randomly select participants for the April 25, 1997 random pool. Prior to executing the random pool, the technician began comparing the required random population with the random pool population in the FFD computer data base. The FFD computer displays its random pool population four times. The first three times the numbers corresponded. However, the technician noted that the fourth display indicated that 106 individuals were not present in the computer random pool. The technician aborted the random selection process and ran a Random Pool Scheduling History. The report provides an ongoing account of individuals in the random pool. The report revealed that 106 individuals had fallen out of the random pool on April 22, 1997 and April 23, 1997. On April 17, 1997 a

demographic upgrade had been done. April 22 was the first random pool executed since the update. It was identified that a human error was made during the update which flagged the 106 individuals in a termination category. The list of the 106 individuals was reviewed for commonalties and none were identified. No individuals associated with the FFD program, computer personnel or quality assurance personnel, were among the 106 individuals. All random data associated with the computer program was reviewed and based upon the data produced, it was concluded previous to April 22, 1997 the computer's random pool population was sound. The problem has been corrected.

FFD has been proactive in identifying issues. During this reporting period, FFD has utilized Palo Verde's corrective action program to identify, evaluate, resolve and document issues and potential concerns. FFD personnel identified and resolved nine issues during this reporting period. The FFD annual audit, performed during this reporting period, resulted in the identification of five additional issues. FFD has evaluated the audit issues and corrective actions have been put into place. The audit team considered FFD personnel's proactive stance in identifying issues and potential concerns using the corrective action program as a strength. The audit team concluded that Palo Verde's FFD Program remains strong and effective. The corrective actions for the 14 issues discussed above are available for review at Palo Verde Nuclear Generating Station.

During the 1997 reporting period, FFD implemented a new program to conduct periodic performance-based challenges. FFD personnel will be confronted with the introduction of surrogate specimens, adulterated specimens, false identifications, out of range specimens, etc. The purpose of the challenge is to enhance FFD skills and to raise awareness of potential real challenges to the FFD Program.

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

Arizona Public Service Company	June 30, 1997
Company	6 months ending
Palo Verde Nuclear Generating Station (PVNGS)	
Location	
Mary F. Maddix	(602) 393-2464
Contact Name	Phone(Include area code)

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

Marijuana	50 / 15	Amphetamines	1000 / 500
Cocaine	300 / 150	Phencyclidine	25 / 25
Opiates	300 / 300	Alcohol (% BAC)	0.04%

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		2138				339	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		76	0	0	0	430	1
For Cause	Post accident	2	0	0	0	0	0
	Observed behavior	9	0	0	0	4	0
Random		539	1	0	0	83	1
Follow-Up		12	0	0	0	5	0
Other		1	0	0	0	0	0
Total		639	1	0	0	522	2

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Ampheta mines	Phency- clidine	Alcohol	Refusal to Test			Total	4	5
Licensee Employees	1	0	0	0	0	0	0			1		
Long-Term Contractors	0	0	0	0	0	0	0			0		
Short-Term Contractors	1	1	0	0	0	0	0			2		
Total	2	1	0	0	0	0	0			3		

Additional Information

3 specimens screened positive for marijuana at the 50 ng/ml and 100 ng/ml level