

# CATEGORY 1

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 KRAINIK, A.K.      Arizona Public Service Co. (formerly Arizona Nuclear Power  
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MAY





Angela K. Krainik  
Department Leader  
Regulatory Affairs  
Palo Verde Nuclear  
Generating Station

Tel: 602/393-5421  
Fax: 602/393-5442

Mail Station 7636  
P.O. Box 52034  
Phoenix, AZ 85072-2034

10 CFR 26.71(d)

102-04252-AKK/SAB/CJJ  
February 26, 1999

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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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 July 1, 1998 through December 31, 1998.

No commitments are being made to the NRC by this letter.

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

Sincerely,

Angela K. Krainik

AKK/SAB/CJJ

Enclosure

cc: L. L. Bush (all w/enclosure)  
E. W. Merschoff  
M. B. Fields  
J. H. Moorman

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ENCLOSURE

ARIZONA PUBLIC SERVICE COMPANY

SEMIANNUAL PERFORMANCE REPORT

JULY 1, 1998 THROUGH DECEMBER 31, 1998



## Introduction

The Arizona Public Service Company (APS) Fitness-for-Duty (FFD) Program continues to remain successful in its mission to maintain a drug-free workplace. During this reporting period APS performed 1254 tests, of these, 631 were administered on a random basis. An equivalent-testing rate of 51 percent was achieved during 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	3	
Alcohol	3	
Cocaine	2	
Opiate	1	
Total	9	confirmed positive test results

Comments: APS tested a total of 564 individuals under the Pre-Access Testing category during this reporting period. The nine individuals registering the confirmed positive test results were short-term contractors. The individual who registered a positive test for opiates failed to make contact with the Medical Review Officer (MRO). The individual was advised several times by FFD personnel to contact the MRO. The MRO made several attempts to contact the individual. The individual was advised that the MRO would most likely declare the test positive if no contact was made. A certified letter was sent to the individual advising him that the test was categorized positive since he failed to contact the MRO and no evidence or documentation was available to support a negative test. The positive result has been entered into the Personnel Access Data System (PADS). All individuals registering a positive test under this category were denied site access and released to their respective employers.

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

Alcohol            1

Total            1                   confirmed positive test results

Comments:    APS tested a total of 11 individuals under the For Cause Testing category during this reporting period. For Cause testing includes: behavior observation, suspected adulteration of specimens; or an odor of alcoholic beverage on individuals. The individual, who registered the positive test, was tested as a result of an alcohol odor about their person. The individual is an APS employee. Access to the protected area was suspended and the individual is currently undergoing treatment. Access to the protected area will not be reinstated until the individual has completed treatment and has been re-evaluated through the Employee Assistance Program.

**Random:**

Amphetamine        1

Marijuana           1

Total                2                   confirmed positive test results

Comments:    APS tested a total of 631 individuals under the Random Testing category during this reporting period. This constitutes a 51 percent testing rate. The two individuals registering the positive tests are APS employees. Both individuals were suspended from the protected area and the site for a minimum of 14 days. During that period an evaluation was done through EAP to determine the type of treatment needed and trustworthiness and reliability. Both individuals have completed treatment and protected area access has been reinstated. Both individuals are participating in the Follow-Up Testing Program.

**Follow-Up Testing:**

Comments:    APS tested a total of 45 individuals as part of the APS Follow-Up Testing Program during this reporting period. None of the individuals tested registered a positive test result.

**Other Testing:**

APS conducted a total of three tests under this category. The three individuals were tested due to a previous positive for opiates. The MRO determined that the positive tests were related to poppy seed consumption. APS policy requires an individual who is suspected of testing positive because of poppy seed consumption to refrain from consuming foods containing poppy seeds for ten days. At the end of the ten-day period, the individuals were required to submit to drug and alcohol testing again and results were negative.

### Reportable Events

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

### Program Review

On December 1, 1998, the Department of Health and Human Services (DHHS) changed the drug testing screening and confirmation cutoff levels for opiates from 300ng/ml to 2000ng/ml. Palo Verde's DHHS certified laboratory was directed to initiate the change in Program Document 036. Therefore, the laboratory began using the higher cutoff level on December 1, 1998 for all of their clients, including Palo Verde. Six specimens were tested at the 2000 ng/ml cutoff level. One of the six specimens was a blind specimen containing opiate metabolites. The laboratory reported the specimen as negative. The laboratory report also stated that opiates were being screened and confirmed at the 2000ng/ml cutoff level. Aliquots of the six specimens were sent to the DHHS certified laboratory and testing was completed at the 300ng/ml cutoff level. The blind specimen result rendered a positive for opiates. The other five specimens were negative. A Vendor Corrective Action Report was submitted to the laboratory and the response has not been received to date. Upon receipt of the report, management will review the laboratory's actions and response. At that time, APS will decide whether to continue using the laboratory in question as the primary laboratory. APS is currently sending FFD specimens to the back up laboratory.

### Planned Actions

APS is currently revising FFD procedures as a result of the number of new and successful adulterants on the market. At the present time, APS checks temperature, specific gravity, and pH during the collection. If specimens fall out of range, an observed collection under the For Cause category is done. The DHHS certified laboratories used by APS test more extensively for adulterants. FFD procedure revisions will require all specimens to be checked for temperature, pH, creatinine, nitrite, specific gravity and gluteraldehyde at the time of collection. Individuals registering a positive adulterant test will be required to undergo a second collection under observation. Adulteration, subversion, or substitution will result in termination. Procedure revision and implementation is scheduled for early February 1999.



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

<b>Arizona Public Service Company</b>	<b>Dec. 31, 1998</b>
<small>Company</small>	<small>6 months ending</small>
<b>Palo Verde Nuclear Generating Station (PVNGS)</b>	
<small>Location</small>	
<b>Mary F. Maddix</b>	<b>(602) 393-2464</b>
<small>Contact Name</small>	<small>Phone(include area code)</small>

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		676				578	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		75	0	0	0	489	9
For Cause	Post accident	1	0	0	0	1	0
	Observed behavior	7	1	0	0	2	0
Random		551	2	0	0	80	0
Follow-Up		39	0	0	0	6	0
Other		3	0	0	0	0	0
Total		676	3	0	0	578	9

### Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phency- clidine	Alcohol	Refusal to Test			Total
Licensee Employees	1	0	0	1	0	1	0			3
Long-Term Contractors	0	0	0	0	0	0	0			0
Short-Term Contractors	3	2	1	0	0	3	0			9
Total	4	2	1	1	0	4	0			12

#### Additional Information

6 specimens screened positive for marijuana at 50 ng/ml  
2 specimens screened positive for marijuana at 100 ng/ml

