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 Jan-June 1999.

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Palo Verde Nuclear
Generating Station

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102-04334 -- AKK/SAB/CJJ
August 24, 1999

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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**

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, 1999 through June 30, 1999.

No commitments are being made to the NRC by this letter. Should you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,

AKK/SAB/CJJ

cc: L. L. Bush (all w/enclosure)
E. W. Merschoff
N. Kalyanam
J. H. Moorman

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ENCLOSURE

ARIZONA PUBLIC SERVICE COMPANY
SEMIANNUAL PERFORMANCE REPORT
JANUARY 1, 1999 THROUGH JUNE 30, 1999

INTRODUCTION

The Arizona Public Service Company (APS) Fitness-for-Duty Program continues to remain successful in its mission to maintain a drug-free workplace. During this reporting period APS performed 1152 tests, of these, 629 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 0.2 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	2	
Alcohol	1	
Refusal	1	
Total	4	confirmed positive test results

Comments: APS tested a total of 466 individuals under the Pre-Access Testing category during this reporting period. The four individuals registering the confirmed positive test results were short-term contractors. The individual whose test was categorized as a "refusal" was deemed to have an adulterated specimen by the off site Department of Health and Human Services (DHHS) certified laboratory. During the collection process the FFD technician identified that the individual's specimen was positive for nitrites. Immunoassay testing registered a positive test for marijuana and the specimen was sent to the DHHS laboratory. Immunoassay screening at the laboratory was also positive for marijuana; however, the laboratory was unable to confirm by GC/Mass Spec. The DHHS laboratory reported the specimen had been adulterated. When the individual was confronted regarding the laboratory report, he did admit that he had introduced a product by the name of "Klear" into his specimen. He stated that he had used it before and had been successful, but not at a nuclear facility. All individuals registering a positive test under this category were denied site access and released to their respective employer.



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

Alcohol	1	
Refusal	1	
Total	2	confirmed positive test results

Comments: APS tested a total of 13 individuals under the For Cause Testing category during this reporting period. For Cause testing includes: behavior observations, post accident, suspected adulteration of specimens, or an odor of alcoholic beverage on an individual. The individual who registered the positive test for alcohol was tested as a result of a security officer detecting the odor of alcohol as the individual was attempting to enter the protected area. The individual was a contractor and his site access was suspended and he was released to his employer. The individual who registered positive as a result of refusal to test was an APS employee. The individual was referred to FFD because his leader detected an odor of alcohol about his person. The individual consented to drug and alcohol testing, but following the first breath alcohol test the individual refused to submit to testing on a different breath alcohol analyzer as required by 10 CFR 26 and elected to terminate his employment with APS. Test results on the first breath alcohol analyzer were 0.052 % and 0.051%. A specimen for drug testing was not collected since the individual refused to participate.

Random:

Marijuana	1	
Total	1	confirmed positive test result

Comments: APS tested a total of 629 individuals under the Random Testing category during this reporting period. This constitutes a 51 percent testing rate. The individual registering the positive was an APS employee. The individual was suspended from the site and protected area for a minimum of 14 days. During that period the individual was to report to EAP to undergo an evaluation to determine the type of treatment needed and trustworthiness and reliability. During the evaluation, the individual informed the EAP counselor that he elected to terminate employment rather than undergo further evaluation and/or treatment. The individual's Human Resources Representative was notified and the individual severed his employment with APS.

Follow-Up Testing:

Marijuana	1	
Amphetamine	1	
Total	2	confirmed positive test results

Comments: APS tested a total of 43 individuals as part of the APS Follow-Up Testing Program during this reporting period. The individual registering a positive test for marijuana was a short-term contractor. He had been placed in the Follow-Up program through EAP. The individual's site access was revoked and he was released to his employer. The individual registering the positive for amphetamines was an APS employee. He had been placed in the program because of a positive test for amphetamines in 1998. APS policy requires termination on the second positive test for drug or alcohol, therefore, the individual's site access was revoked and the individual was terminated.

Other Testing:

APS conducted one test under this category. The individual tested was an APS leader. APS has an additional random pool for leaders. Leaders are placed into this random program if they do not have access to the protected area or do not fall under a regulatory drug and alcohol-testing program. The leader tested registered a negative test result.

Reportable Events

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

Program Review

FFD has been purchasing adulteration products to determine how to detect their presence and to determine whether or not they are effective. As a result of the adulterated specimen identified during this reporting period, FFD is aware that "Klear" is effective in the confirmation process; but it is also easily detected by testing for nitrites. "Urine Luck" made by Spectrum Laboratory has been reported through the media, Internet and the industry as being an effective adulterant. It is not as easily detected as "Klear" but FFD has not found it to be an effective adulterant. FFD technicians split a blind specimen spiked with the marijuana metabolite into two separate specimens. Each specimen contained approximately 30 c.c.s of urine. Urine Luck was introduced into one specimen, Specimen 39639. Nothing was done to the other specimen, Specimen 39640. On site immunoassay screening was done and both specimens screened positive for marijuana. Both specimens were packaged and sent to the DHHS certified laboratory. The DHHS laboratory was unaware of the contents of the specimens. Both specimens screened positive and confirmed positive for marijuana. Quantitation levels for Specimen 39639 (containing Urine Luck) were slightly lower than Specimen 39640. Specimen 39639 quantitation level was 180 ng/ml and Specimen 39640 was 206 ng/ml.

FFD technicians were concerned that Urine Luck would cause rapid deterioration of the marijuana metabolite and, therefore, requested the laboratory to retest the specimen after a period of one month. Both specimens continued to be positive with nanogram levels of Specimen 39639, 163 ng/ml and Specimen 39640, 193 ng/ml.

The DHHS certified laboratory did not detect the presence of Urine Luck. Discussions with the laboratory's certifying scientist revealed that laboratory practices require additional testing for adulterants on all specimens that screen positive but confirm negative. The specimens presented screened positive and confirmed positive, therefore, no additional testing was done to identify the presence of an adulterant.

Urine Luck does not appear to be an effective adulterant; however, FFD is proceeding cautiously in this area. Urine Luck may be effective in masking specimens registering lower quantitation levels. The shelf life of Urine Luck is unknown and the quality control of the manufacture, if any is unknown. Specimens containing Urine Luck may register a positive test for nitrites by using Multistix 10 SG. However, the primary purpose of Multistix 10 SG is to detect medical conditions, not adulterants. FFD plans to continue to experiment with Urine Luck as well as other adulterants identified to be potentially effective.

APS has evaluated the equipment associated with FFD for Y2K compliance. Software for the immunoassay equipment was not Y2K compliant but with the help of the vendor this has been resolved. Other testing equipment has been deemed Y2K compliant.

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

Arizona Public Service Company	June 30, 1999
Company	6 months ending
Palo Verde Nuclear Generating Station (PVNGS)	
Location	
Mary F. Maddix	(623) 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		2152		0		313	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre- Access		72	0	0	0	394	4
For Cause	Post accident	1	0	0	0	2	0
	Observed behavior	5	1	0	0	5	1
Random		533	1	0	0	96	0
Follow-Up		38	1	0	0	5	1
Other		1	0	0	0	0	0
Total		650	3	0	0	502	6



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Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Ampheta- mines	Phency- clidine	Alcohol	Refusal to Test		Total
Licensee Employees	1	0	0	1	0	0	1		3
Long-Term Contractors	0	0	0	0	0	0	0		0
Short-Term Contractors	3	0	0	0	0	2	1		6
Total	4	0	0	1	0	2	2		9

Additional Information

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

