

# CATEGORY / 1

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SUBJECT: Forwards fitness for duty program performance data for six-month period from 980101-0630, per 10CFR26.71(d). Data sheets include statistics on various categories of testing & substances for which testing is conducted.

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Indiana Michigan  
Power Company  
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October 7, 1998

AEP:NRC:1103N  
10 CFR 26.71(d)

Docket Nos: 50-315  
50-316


U. S. Nuclear Regulatory Commission  
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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2  
10 CFR Part 26, FITNESS FOR DUTY PROGRAM

In compliance with 10 CFR 26.71(d), Fitness For Duty Program, this submittal represents the Cook Nuclear Plant fitness for duty program performance data for the six-month period from January 1, 1998, to June 30, 1998. Attached are performance data sheets that include statistics on the various categories of testing, substances for which testing is conducted and a summary of management actions.

Sincerely,

  
R. P. Powers  
Vice President

/jmc

Attachments

c: J. A. Abramson, w/attachments  
J. L. Caldwell, w/attachments  
MDEQ - DW & RPD  
NRC Resident Inspector, w/attachments  
J. R. Sampson, w/attachments

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ATTACHMENT TO AEP:NRC:1103N

DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2  
10 CFR PART 26  
FITNESS FOR DUTY PROGRAM

TESTING CATEGORIES AND SUBSTANCES

The following is offered as an explanation for information outlined in the performance data report regarding the various categories of testing and the substances for which testing is conducted:

Long term contractor personnel - plant protection contractors

Short term contractor personnel - all contractor personnel other than plant protection

Marijuana confirmed positives noted on page two of the performance data report are reported as one positive for short term contractor personnel at the DHHS/NRC cut-off level (100 NG), and three positives for short term contractor personnel at Cook Nuclear Plant's more conservative cut-off level (50 NG). Six short term contractor personnel were positive for THC at Cook Nuclear Plant's suspect level (20 NG) as follows: one licensee employee, one long term contractor and four short term contractors.

Of the total positive tests reported, thirteen were the result of pre-access applicant testing (twelve with positive results and one deemed positive based on the individual's refusal to provide a specimen for testing) and four were the result of random tests.

A total of seventeen tests were reported as positive on the "Breakdown of Confirmed Positive Tests for Specific Substances". This number reflects reported test results being positive for more than one substance and one refusal to test.

**FITNESS FOR DUTY PROGRAM  
PERFORMANCE DATA  
PERSONNEL SUBJECT TO 10CFR26**

<u>Indiana Michigan Power Co.</u>	<u>6/30/98</u>
Company	6 Month Ending
<u>Cook Nuclear Plant, Bridgman, Michigan</u>	
Location	
<u>K.E. Burkett</u>	<u>(616)466-3335</u>
Contact Name	Phone
Cutoffs: Screen/Confirmation (ng/ml) <span style="float: right;"><input type="checkbox"/> Appendix A to 10CFR26</span>	
Marijuana 50/15	Amphetamine 1000/500 <u>N/A</u> <u>N/A</u>
Cocaine 300/150	Phencyclidine 25/25 <u>N/A</u> <u>N/A</u>
Opiates 300/300	Alcohol (%BAC) 0.04% <u>N/A</u> <u>N/A</u>

Testing Results	Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access	1154		98		413	
Categories	# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access	39	0	31	1	494	11
For-Cause Post Accident	3	0	2	0	0	0
For-Cause Observed Behavior	0	0	0	0	0	0
Random	325	1	27	0	84	3
Follow-Up	11	0	0	0	28	0
Other	27	0	1	0	3	1
Total	405	1	61	1	609	15

**BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

	Marijuana 50   100		Cocaine	Opiates	Amphetamines	Phencyclidene	Alcohol	Refusal To Test	Marijuana Suspect Specimen			
Licensee Employee	0	0	0	0	0	0	0	0	1			
Long-Term Contractors	0	0	0	0	0	0	0	0	1			
Short-Term Contractors	3	1	3	0	1	0	2	1	4			
Total	3	1	3	0	1	0	2	1	6			

Total Confirmed Positive Tests For All Specific Substances and Refusals to Test: 17



MANAGEMENT ACTIONS

Meetings and surveillances are conducted with laboratory and collection site personnel, medical review officer(s), employee assistance program staff, and psychological assessment personnel to assure consistent and effective implementation of the fitness for duty program.

The high number of pre-access positive results was identified due to Cook Nuclear Plant's "suspect specimen" process. Specimens collected and deemed "suspect specimens" are tested at a lower cut-off level. Observed behavior in the collection facility, specimen temperature out of range, and collection site specific gravity test results out of range are some of the reasons to believe a particular individual may have altered or substituted a urine specimen. A second specimen is obtained under direct observation, as applicable, and both specimens are tested at the "suspect specimen" cut-off level.

The canine program continues to be a constant reminder to plant personnel of Cook Nuclear Plant's determination to maintain a drug free work environment. The canine unit provides anti-drug presentations to local schools and other community organizations in addition to regular tours of Cook Nuclear Plant property. The canine unit also assists local law enforcement agencies upon request. A new canine was purchased during this reporting period due to the age and future retirement of the canine who has been serving Cook Nuclear Plant and the community for the past several years.

APPEAL

One appeal was received during this reporting period. The appeal for this individual was denied based on: 1) failure to provide sufficient mitigating circumstances or evidence showing why the denial determination was incorrect; and 2) insufficient reasoning for leaving Cook Nuclear Plant when notified of a recollection requirement.

EVENTS

One event was identified as reportable in accordance with 10 CFR 26.73 during this reporting period. A contractor supervisor was reported as positive for a random test and notification to the NRC was not conducted within the required 24-hour time frame.

TEMPORARY SUSPENSIONS

No temporary suspensions or administrative actions were taken against individuals based on on-site presumptive positive drug testing results.

We continue to perform annual random testing of a rate equal to or exceeding 50% of the total population.