



Callaway Energy Center

January 29, 2019

ULNRC06483

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

10 CFR 26.717

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
RENEWED FACILITY OPERATING LICENSE NPF-30  
FITNESS FOR DUTY PROGRAM PERFORMANCE DATA FOR AMEREN MISSOURI  
CALLAWAY ENERGY CENTER FOR 2018**

The enclosed electronic documents contain 2018 Fitness for Duty Program Performance Data for Ameren Missouri's Callaway Energy Center in accordance with 10 CFR 26.717.

This letter does not contain new commitments.

If there are any questions, please contact Amy Findley at 573-676-4435.

Sincerely,

A handwritten signature in blue ink that reads "Amy Findley".

Amy Findley  
Supervisor, Access Authorization/  
Fitness for Duty

Enclosure

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January 24, 2019  
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cc: Mr. Scott A. Morris  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. L. John Klos  
Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O9E3  
Washington, DC 20555-0001

**Index and send hardcopy to QA File A160.0761**

**Hardcopy:**

Certrec Corporation  
6100 Western Place, Suite 1050  
Fort Worth, TX 76107  
(Certrec receives ALL attachments as long as they are non-safeguards and may be publicly disclosed.)

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Mr. Jay Silberg (Pillsbury Winthrop Shaw Pittman LLP)  
Missouri Public Service Commission

APPROVED BY OMB: CLEARANCE NO. 3150-0146

EXPIRES: 04/30/2021

Estimated burden per response to comply with this collection request is 108 hours. This form is a voluntary means of reporting the information required under 10 CFR 26.417(b)(2) and 26.717. The information is required by NRC to obtain on an annual basis site specific fitness-for-duty (FFD) program performance data on drug and alcohol programs from licensees and other entities. Send comments regarding burden estimate to the FOIA, Privacy and Information Collection Branch (T5-F53), U.S. Nuclear Regulatory Commission, Washington DC 20555-0001, or by e-mail to [InfoCollects.Resource@NRC.gov](mailto:InfoCollects.Resource@NRC.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-1020, (3150-0146), Office of Management and Budget, Washington DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

- 1) All fields required unless marked 'optional'  
2) Use of Adobe Reader 8 or later is required  
3) Mouse over fields for additional information

☐ Submission  
Update

Facility

Callaway [50-483]

Period of Report

2018

**Tests Conducted in the Calendar Year**

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access	137	239	5
Random	490	149	1
For Cause	2	1	0
Post-Event	1	1	0
Follow-up	40	19	0
Total (Calculated)	670	409	6

**FFD Program Random Testing Population and Rate**

Average number of licensee employees

877

Average number of contractors/vendors

229

Total size of the random testing pool throughout the period (Calculated)

1,106

Annual random testing percentage achieved for the testing pool

57.7

**Laboratory Testing**

Does your program use a Licensee Testing Facility? (Yes / No)

No

HHS-Certified Laboratory (Primary)

Laboratory Corporation of America Holdings, LabCorp-RTP, NC

HHS-Certified Laboratory (Backup)

Clinical Reference Laboratory 8433 Quivira Road

Identify your Blind Performance Test Sample supplier(s)

EiSohly Laboratories, Incorporated (ELI)  
5 Industrial Park Drive

**Substances Tested**

Did your program only test for NRC-required substances AND at the NRC-specified minimum cutoff levels? (Yes / No)

Yes

Does your program conduct LOD testing permitted in 26.163(a)(2)? (Yes / No)

Yes

**Special Analyses Testing Results**

Total Number of "Dilute" Specimen Test Results (Optional)

7

Total Number of "Dilute" Specimens (Special Analyses Testing Conducted)

0

Substance	Use NRC Cutoffs?	Initial Cutoff	Confirmatory Cutoff	Limit of Detection (LOD) Testing?	Comment (Optional)
Alcohol	Yes			Not Applicable	
Cocaine	Yes			Yes	None Required
Marijuana	Yes			Yes	None Required
Amphetamines	Yes			Yes	None Required
Opiates	Yes			Yes	None Required
PCP	Yes			Yes	None Required

**Substances Tested - continued**

**Summary of Management Actions - 26.717(b)(8)**

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Certified Laboratories

Topic 1 Description

On 9-24-18 Ameren Missouri administratively suspended Clinical Reference Lab as our primary lab and began using LabCorp as our primary lab. This change was due to an investigation following a "rejected for testing" result for two specimens. ULNRC-06471 was sent to NRC on 11-16-18 regarding the specimen handling error.

☒ Add an additional Topic

Topic 2

Program and System Management

Topic 2 Description

Event Number 53426  
Notification Date: 5-23-18  
Notification Time: 1832 [ET]  
Event Date: 5-23-18  
Event Time: 0730 [CDT]  
Last Update Date: 5-23-18

On May 23, 2018 Callaway determined that a violation of one provision of the site's Fitness for Duty (FFD) policy occurred. FFD pre-access testing confirmed a test failure for alcohol. The violation was committed by a non-licensed supervisory employee. The individual did not hold unescorted access to the plant but did perform behavioral observation (BOP) duties. The BOP qualification has been removed.

☐ Add an additional Topic

**Person(s) Responsible for Information Provided**

Person 1 (required):

<input type="text" value="Randi"/>	<input type="text" value="Patterson"/>	<input type="text" value="AA/FFD Coordinator"/>	<input type="text" value="rpatterson2@ameren.com"/>
First Name	Last Name	Position Title	Company Email Address

Person 2 (optional):

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
First Name	Last Name	Position Title	Company Email Address

**Final Step (Required)** - NRC will consider this form authentic in accordance with 10 CFR 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Locked

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