

Iowa Electric Light and Power Company

February 24, 1993

DAEC-93-0019

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Fitness for Duty  
File: A-202

Gentlemen:

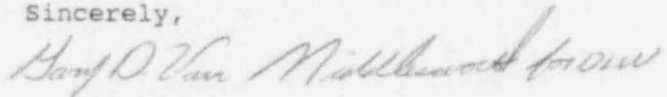
In accordance with 10 CFR 26.71(d), Fitness for Duty Rule, Record Keeping Requirements, please find enclosed Iowa Electric Light & Power Company's report of program performance information for the Duane Arnold Energy Center during this six month period July 1 to December 31, 1992.

Enclosures include:

- \* Fitness for Duty Program Performance Data  
Personnel Subject to 10 CFR Part 26
- \* Breakdown of Confirmed Positive Tests  
for Specific Substances
- \* Summary Report

If you have any questions regarding this submittal please contact D. Engelhardt at (319)851-7280.

Sincerely,



David L. Wilson  
Plant Superintendent - Nuclear

Enclosures: As stated

DLW/MD/SE/bj

cc: L. Liu  
L. Root  
R. McGaughy  
J. Franz  
K. Young  
A. Bert Davis (NRC Region III)  
R. Pulsifier (NRC-NRR)  
NRC Resident Inspector

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Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR26

IOWA ELECTRIC LIGHT & POWER COMPANY Company	DECEMBER 31, 1992 6 Months Ending
DUANE ARNOLD ENERGY CENTER Location	
DIANE ENGELHART Contact Name	(319) 851-7280 Phone (include area code)
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR26	
Marijuana 300/15	Amphetamines 1000/500 /
Cocaine 300/150	Phencyclidine 25/25 /
Opiates 300/300	Alcohol (% BAC) .04% /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		754		152		55	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Accers		39	0	32	0	57	0
	Post accident	N/A	N/A	N/A	N/A	N/A	N/A
	Observed behavior	3	0	N/A	N/A	1	0
Random		444	0	58	0	23	0
Follow-up		23	1	N/A	N/A	N/A	N/A
Other		N/A	N/A	N/A	N/A	N/A	N/A
Total		509	1	90	0	81	0

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	5	A
Licensee Employees	-----	1	-----	-----	-----	-----	-----						
Long-Term Contractors	-----	-----	-----	-----	-----	-----	-----						
Short-Term Contractors	-----	-----	-----	-----	-----	-----	-----						
Total	-----	1	-----	-----	-----	-----	-----						1

## FITNESS FOR DUTY SUMMARY REPORT

JULY 1, 1992 TO DECEMBER 31, 1992

ATTACHMENT TO DAEC-93-0019

### SYNOPSIS:

During this reporting period, Iowa Electric Light & Power Company (IELP) conducted 680 drug/alcohol tests, in accordance with 10 CFR Part 26. The breakdown of this testing is:

525	Random Tests / 0 Positive
128	Pre-Access Tests / 0 Positive
23	Follow-Up Tests / 1 Positive (Cocaine)
4	For-Cause Tests (Observed Behavior) / 0 Positive
<u>680</u>	Total

Random tests were given to 54.4 percent of the average population, combining with the previous reporting period to equal 117.75 percent of the average population in 1992. Positive random test results for this reporting period were 0.0 percent. Positive test results for all classifications of testing was 0.10 percent.

IELP follows the DHHS/NRC guidelines for substances tested and specified cut off levels. Special processing at lower cut off levels was invoked for three specimens provided by a worker in a follow-up testing program. These specimens had been determined to be suspicious in nature by the MRO. Details follow in the sections below.

### MANAGEMENT ACTIONS TAKEN:

A former licensed operator had been positive for cocaine in a random test in December, 1991. His access authorization was restored February 13, 1992 and he was placed in a follow-up testing program but he was not restored to licensed duties. In September, 1992, this individual furnished three specimens which, the laboratory reported, had low creatinine levels. The MRO concluded that the specimens were suspicious and might have been adulterated. Therefore, the specimens were subjected to special processing (see 10 CFR Part 26, Appendix A, Section 2.7(d) and (f)) with analysis for drugs to the limits of detection, rather than the standard cut-off levels. One of the specimens was confirmed as positive for cocaine. The individual's access was immediately suspended and management review was initiated. The positive test result was reported to the NRC within twenty-four hours because the individual still held an operator's license. Management concluded that unescorted access would be revoked for three years and the individual's employment was later terminated.

A utility employee (supervisor) was suspended from unescorted access and subject to for-cause testing based on credible information about his possible knowledge of or involvement with off-site drug related activities involving a relative. The suspension was reported to the NRC within twenty-four hours because the individual is a supervisor. Subsequent criminal investigation by Local Law Enforcement Agencies did not implicate the worker. After negative test results and management review, unescorted access was reinstated and included enhanced performance observation.

Fitness for Duty Summary Report  
Attachment to DAEC-93-0019  
February 23, 1993

A contract employee's unescorted access was suspended and a for-cause test given when the worker reported his arrest for fraudulent alteration of medical prescriptions. Access was later reinstated after resolution of the criminal/judicial proceedings and a detailed background investigation and psychological evaluation with no adverse finding.

#### INITIATIVES TAKEN:

Program data processing methodology was reviewed and recommendations made to upgrade to current needs. IELP has begun proceduralizing use of laboratory testing for creatinine levels as a counter measure against subversion of testing by adulteration or dilution, including hydration.

#### LESSONS LEARNED:

Utilizing regulatorily-allowed procedures such as special processing, and additional laboratory tests for creatinine can provide effective techniques to detect the very small percentage of workers in the Nuclear Industry who continue to use drugs, without significant cost increase to the program. FFD administrators should be constantly re-evaluating their programs for effectiveness in dealing with testing subversion. This information can be obtained from other utility members, local law enforcement agencies, substance abuse programs and other sources.

#### EFFECTIVE EVALUATION:

Iowa Electric Light & Power Company's FFD program is achieving its desired goal, as stated in the general performance objectives of 10 CFR Part 26.