

PHILADELPHIA ELECTRIC COMPANY

10CFR26.71(d)

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

March 1, 1993

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

DEPARTMENT

U.S. Nuclear Reg.
Attn: Document Con.
Washington, DC 20555

SUBJECT: Peach Bottom A Station, Units 2 and 3
Limerick Gener Units 1 and 2
Fitness-for-I Performance Data for
the Period January 1992

Dear Sir:

As required by 10 CFR 26.71(d), this letter submits the performance data for our Fitness-for-Duty (FFD) program for the period July 1992 through December 1992. The data is for our Peach Bottom Atomic Power Station (PBAPS), Units 2 and Limerick Generating Station (LGS), Units 1 and 2, sites are included in Attachments 1 and 2. Data for our Corporate Office and Nuclear Group Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA and 955-65 Chesterbrook Boulevard, Wayne, PA respectively) are also provided in Attachment 3.

The data are reported on the January 1992 revision of the Fitness-for-Duty (FFD) Performance Data form provided by the Nuclear Management and Resources Council (NUMARC), and include the following.

- Drugs tested for and cut-off levels.
- Workforce population tested.
- Numbers of tests and results by population and type of test (i.e., pre-access, for-cause, random, follow-up, and other types of tests.)
- Substances identified.

Attachments 1, 2, and 3 also include the following.

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- Analysis of the data and appropriate actions that have been or will be taken.
- Random testing rate.

During this period, there were two events which were reportable under 10 CFR 26.73. The details of the events are discussed in Attachments 1 and 2.

If you have any questions or require additional information, please contact us.

Very truly yours,



G. J. Beck, Manager
Licensing Section

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC w/attachments
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS
w/attachments
T. J. Kenny, USNRC Senior Resident Inspector, LGS w/attachments

ATTACHMENT 1
Fitness for Duty Program
Performance Data
Personnel Subject to 10CFR 26

Philadelphia Electric Company	07/01/92 - 12/31/92
Company	# Months Employed
Peach Bottom Atomic Power Station	
Location	
David M. Sarley	(215) 841-5703
Contact Name	Phone (include area code)
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana 100 / 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		2928 *				2034 *	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		4				1098	12
For Cause	Post accident	2				2	
	Observed behavior	1	1			2	1
Random		638	2			641	1
Follow-up		30	1**			1	
Other		30				3	
Total		705	4			1747	14

* Includes individuals with dual-site access at PBAPS and LGS.

** Test was conducted at LGS for Technical Assistant with limited SRO license at PBAPS and LGS.

REV.1/92

PEACH BOTTOM ATOMIC PLANT 07/01/92 - 12/31/92

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees		2				1							
Long-Term Contractors													
Short-Term Contractors	9	3				2	3						A
Total	9	5				3	3						20

ATTACHMENT 1

Summary of Data Analysis and Management Actions
Peach Bottom Atomic Power Station
July - December 1992

I. Initiatives Taken

The following summarizes the results of sweeps conducted by Philadelphia Electric Company's (PECo's) drug sniffing canine teams at Peach Bottom Atomic Power Station (PBAPS) during this period.

- A. July 28, 1992 - General team search of vehicles entering the Protected Area. Results: Six activations. No drugs found or forensic samples taken.
- B. August 17, 1992 - For cause team search of a private vehicle. Results: Four activations. No drugs found or forensic samples taken. Investigation verified off-site drug abuse. Contractor's plant access denied.
- C. August 17, 1992 - For cause team search of private vehicle. Results: One activation. No drugs found or forensic samples taken.
- D. August 20, 1992 - For cause team search of a private vehicle. Results: Three activations. No drugs found or forensic samples taken. Open bottle of whiskey discovered in the vehicle. Contractor's plant access denied.
- E. August 20, 1992 - For cause team search of a private vehicle. Results: Three activations. No drugs found or forensic samples taken. Investigation verified previous off-site drug abuse and current association with drug users. Contractor's plant access denied.
- F. August 21, 1992 - For cause team search of a private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- G. August 27, 1992 - General team sweep of a private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- H. August 27, 1992 - For cause team search of a private vehicle. Results: One activation. No drugs found or forensic samples taken. Investigation verified off-site association with drug users. Individual placed on accelerated testing by PECo Medical.
- I. August 31, 1992 - For cause team search of a private vehicle. Results: Two activations. No drugs found or forensic samples taken.

- J. August 31, 1992 - For cause team search of a private vehicle. Results: Four activations. No drugs found or forensic samples taken. Investigation verified previous off-site drug abuse. Contractor's plant access denied.
- K. September 16, 1992 - For cause team search of a private vehicle. Results: Two activations. During search of the vehicle, suspected marijuana was found in the ash tray. Laboratory analysis confirmed the substance to be marijuana. Contractor's plant access denied.
- L. October 28, 1992 - General team sweep of Health Physics Field Office. Results: Sixteen activations. No drugs found or forensic samples taken.
- M. December 22, 1992 - General team sweep of Instrumentation and Controls Shop Area. Results: Ten activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, three PECO employees tested positive at PBAPS. Two employees tested positive on random tests. Both employees were provided treatment/rehabilitation through PECO's Employee Assistance Program (EAP). Unescorted access has been reinstated for one of the employees. The third employee tested positive as a result of a for-cause test that was ordered based on observed behavior. The employee was provided treatment/ rehabilitation through PECO's EAP. There was a fourth employee who tested positive as a result of a follow-up test. The test was performed at LGS. This positive test result is also included in the PBAPS data since, the employee held Senior Reactor Operators (SRO) License limited to fuel handling at both PBAPS and Limerick Generating Station (LGS).

During the period, fourteen contractor employees (i.e., twelve pre-access, one for-cause/observed behavior, and one random) tested positive at PBAPS. Unescorted access has been denied for those contractor employees in accordance with PECO's Fitness-For-Duty (FFD) Specifications for Contractors.

III. Events Reported Under 10CFR26.73

The following is a summary of events which were reportable under 10 CFR 26.73 for the period of July 1, 1992 through December 31, 1992.

- On August 5, 1992, a PBAPS Health Physics Shift Supervisor, had a Medical Review Officer (MRO) confirmed positive, random drug test for cocaine. The individual's security clearance was revoked. The employee was sent to the corporate medical office for further evaluation and treatment. A review was conducted of the individual's previous work activities to ensure there were no unreviewed safety concerns. No safety concerns were identified as a result of this review.

Subsequent to successful completion of a drug rehabilitation program, the individual's security clearance was reinstated and the employee was permitted to return to work in a non-supervisory capacity on October 6, 1992. This individual is currently in the Fitness-for-Duty (FFD) Follow-Up Testing Program.

- On September 23, 1992, a Technical Assistant within the PECO Nuclear Group Headquarters who, at that time, held a SRO License, limited to fuel handling for both PBAPS and LGS, had an MRO confirmed positive follow-up drug test for marijuana. The follow-up test was conducted at LGS. However, the event is being reported for both PBAPS and LGS because the employee held a dual license.

The individual's security clearance was revoked. The employee was sent to the corporate medical office for further evaluation and treatment. A review was conducted of the individual's previous work activities to ensure there were no unreviewed safety concerns. No safety concerns were identified. The details of this event were included in our letters to the NRC dated October 5 and November 17, 1993.

Subsequent to successful completion of a drug rehabilitation program, the individual was permitted to return to work. He was not permitted to perform any safety related activities. The individual's security clearance continues to be revoked. This individual is currently in the FFD Follow-Up Testing Program.

IV. Nuclear Quality Assurance Audit

During the period, a performance based audit of the FFD program was completed to assess the program's implementation.

The auditors concluded that the FFD program adequately addresses the performance objectives of 10 CFR 26. The audit concluded that "since the last audit, a marked improvement was identified in the area of on-site collection and testing. . ."

The following strengths and weaknesses were identified.

Strengths

- On-site testing facility Site Managers were well qualified and knowledgeable of testing procedures. Also, detailed, well maintained logs were available to document collection and testing activities.
- Collection site personnel were well trained and knowledgeable of their duties and responsibilities.
- The Laboratory Director and the HHS-certified laboratory was extremely knowledgeable in drug abuse problems and the drug testing process and protocols.

- The laboratory staff of the HHS-certified laboratory was knowledgeable of the regulatory requirements and was dedicated to strict observance of process procedures and manuals.
- The HHS-certified laboratory collection/chemical testing procedures were consistent with the requirements set forth by 10 C.F.R. 26 and PECO.
- MRO activities were well documented and readily retrievable personnel.
- Marked improvement regarding on-site collection/testing implementation by PECO contracted personnel was identified.
- The professionalism and expertise exhibited by PECO FFD staff during the audit provided reasonable assurance of continued compliance to 10 CFR 26 requirements.

Weaknesses

- Documentation deficiencies were noted in a for-cause test of a courier.
- Identification of FFD training deficiencies were not consistently provided to PECO employing officers and contractor management.
- Documentation of the transfer of three specimens collected at Nuclear Group Headquarters was incomplete.
- Medical Department copies of forms documenting suspension of unescorted access were not properly secured.

Corrective actions have been implemented to resolve the weaknesses which were identified.

V. Random Testing Rate

PECO conducts random testing at an annualized rate of 100%. While PECO maintains separate testing "pools" for employees and contractors, the "average number with unescorted access" includes personnel badged at both PBAPS and LGS.

VI. Additional Information

On July 1, 1992, barbiturates and benzodiazepines were deleted from the test panel based on a previously conducted review. The review identified that during the two-year period of 1989 and 1990, PECO conducted 22,958 drug tests. Of the 989 presumptive initial (i.e., EMIT) positives, 268 (i.e., 27%) were for barbiturates or benzodiazepines. Of those, only 14 were declared positive by the MRO (i.e., a positive rate of 0.06%). Based on this review, we have concluded that barbiturates and benzodiazepines are not an abuse problem within our workforce.

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

Philadelphia Electric Company	07/01/92 - 12/31/92
Company	6 Months Ending
Limerick Generating Station	
Location	
David M. Sarley	(215) 841-5703
Contact Name	Phone (include area code)
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana 100 / 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		2928 *				2034 *	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		33	1			411	5
For Cause	Post accident	10				3	
	Observed behavior	1					
Random		505				387	1
Follow-up		23	1			6	1
Other		7					
Total		579	2			807	7

* Includes individuals with dual-site access at PBAPS & LGS.

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Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	1	1											
Long-Term Contractors													
Short-Term Contractors	3	3		1			1						A
Total	4	4		1			1						10

ATTACHMENT 2

Summary of Data Analysis and Management Actions
Limerick Generating Station
July - December 1992

I. Initiatives Taken

The following summarizes the results of sweeps conducted by Philadelphia Electric Company's (PECo's) drug sniffing canine teams at Limerick Generating Station (LGS) during this period.

- A. July 24, 1992 - General team sweep of the Unit 2 Reactor Building, Main Control Room and Radwaste Control Room. Results: No activations. No drugs found or forensic samples taken.
- B. July 24, 1992 - For-cause team search of a private vehicle. Results: No activations. Investigations verified significant criminal record. Contractor's plant access denied.
- C. July 31, 1992 - For-cause team search of a private vehicle. Results: No activations. Employee is in the Fitness-for-Duty (FFD) Follow Up Program.
- D. August 14, 1992 - General team sweep of contractors' vehicles in parking lot. Results: One activation. Thirty-six milligrams of marijuana was discovered in a landscape contractor truck. Employees routinely accessing this truck do not possess unescorted access. Remedial action: Contractor ordered to provide additional training to their staff regarding PECO Drug/Alcohol Policy.
- E. September 14, 1992 - A general team sweep of the Spray Pond Pump House. Results: No activations. No drugs or forensic samples taken.
- F. October 21, 1992 - For cause team search of a private vehicle. Results: No activations. Investigation confirmed employee attempted to pass a fraudulent prescription for a narcotic. Employee evaluated and suspended from work.
- G. November 30, 1992 - General team sweep of the contract Health Physics Support Building and the Second Floor of the Graham Leitch Building. Results: One activation. No drugs found or forensic samples taken.

II. Management Actions

During the period, two PECO employees (i.e., one follow-up, one pre-access) tested positive at LGS. Both employees were provided with treatment/rehabilitation through PECO's Employee Assistance Program (EAP). The pre-access test was conducted for a current PECO employee seeking unescorted nuclear access. Unescorted access has been denied for both employees.

In accordance with PECO's FFD Specification for Contractors, unescorted access has been denied for seven (7) contractor employees (five pre-access, one random, one follow-up) who tested positive during the period.

III. Events Reported Under 10CFR26.73

The following is a summary of events which were reportable under 10 CFR 26.73 for the period of July 1, 1992 through December 31, 1992.

- On September 23, 1992 a Technical Assistant within the PECO Nuclear Group Headquarters who, at that time, held a Senior Resident Operators (SRO) License, limited to fuel handling for both Peach Bottom Atomic Power Station (PBAPS) and LGS, had an Medical Review Officer (MRO) confirmed positive follow-up drug test for marijuana. The follow-up test was conducted at LGS. However, the event is being reported for both Peach Bottom Atomic Power Station (PBAPS) and LGS because the employee held a dual license.

The individual's security clearance was revoked. The employee was sent to the corporate medical office for further evaluation and treatment. A review was conducted of the individual's previous work activities to ensure there were no unreviewed safety concerns. No safety concerns were identified. The details of this event were included in our letters to the NRC dated October 5 and November 17, 1993.

Subsequent to successful completion of a drug rehabilitation program, the individual was permitted to return to work. He was not permitted to perform any safety related activities. The individual's security clearance continues to be revoked. This individual is currently in the FFD Follow-Up Testing Program.

IV. Nuclear Quality Assurance Audit

During the period, a performance based audit of the Fitness-For-Duty program was completed to assess the program's implementation.

The auditors concluded that the FFD program adequately addresses the performance objectives of 10 CFR 26. The audit concluded that "since the last audit, a marked improvement was identified in the area of on-site collection and testing. . ."

The following strengths and weaknesses were identified.

Strengths

- On-site facility Site Managers were well qualified and knowledgeable of testing procedures. Also, detailed, well maintained logs were available to document collection and testing activities.

- Collection site personnel were well trained and knowledgeable of their duties and responsibilities.
- The Laboratory Director of the HHS-certified laboratory was extremely knowledgeable in drug abuse problems and the drug testing process and protocols.
- The laboratory staff of the HHS-certified laboratory was knowledgeable of the regulatory requirements and was dedicated to strict observance of process procedures and manuals.
- The HHS-certified laboratory collection/chemical testing procedures were consistent with the requirements set forth by 10 CFR 26 and PECO.
- The MRO activities were well documented and readily retrievable.
- Marked improvement regarding on-site collection/testing implementation by PECO contracted personnel was identified.
- The professionalism and expertise exhibited by PECO FFD staff during the audit provided reasonable assurance of continued compliance to 10 CFR 26 requirements.

Weaknesses

- Documentation deficiencies were noted in a for-cause test of a courier.
- Identification of FFD training deficiencies were not consistently provided to PECO employing officers and contractor management.
- Documentation of the transfer of three specimens collected at Nuclear Group Headquarters was incomplete.
- Medical Department copies of forms documenting suspension of unescorted access were not properly secured.

Corrective action have been implemented to resolve the weaknesses which were identified.

V. Random Testing Rate

PECO conducts random testing at an annualized rate of 100%. While PECO maintains separate testing "pools" for employees and contractors, the "average number with unescorted access" includes personnel badges at both PBAPS and LGS.

VI. Additional Information

On July 1, 1992, barbiturates and benzodiazepines were deleted from the test panel based on a previously conducted review. The review identified that during the two-year period of 1989 and 1990, PECO conducted 22,958 drug tests. Of the 989 presumptive initial (i.e., EMIT) positives, 268 (i.e., 27%) were for barbiturates or benzodiazepines. Of those, only 14 were declared positive by the MRO (i.e., a positive rate of 0.06%). Based on this review, we have concluded that barbiturates and benzodiazepines are not an abuse problem within our workforce.

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

Philadelphia Electric Company	07/01/92 - 12/31/92
Company	6 Months Ending
Corporate and Nuclear Headquarters	
Location	
David M. Sarley	(215) 841-5703
Contact Name	Phone (include area code)
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana 100 / 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		2928 *				2034 *	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		17				3	
For Cause	Post accident	4					
	Observed behavior	2					
Random		330	1			37	
Follow-up		12	1				
Other		11					
Total		376	2			40	0

* Includes individuals with dual-site access at PBAPS & IGS.

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Breakdown of Confirmed Positive Tests for Specific Substances

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

ATTACHMENT 3

Summary of Data Analysis and Management Actions
Corporate and Nuclear Group Headquarters
July - December 1992

I. Initiatives Taken

The following summarizes the results of sweeps conducted by Philadelphia Electric Company's (PECo's) drug sniffing canine teams at Corporate and Nuclear Group Headquarters during this period.

- A. September 21, 1992 - General team sweep of Chesterbrook Building 965, Wing A, Third Floor. Results: No activations. No drugs found or forensics samples taken.
- B. December 15, 1992 - General team sweep of Chesterbrook Building 955, Wing B, Second Floor. Results: No activations. No drugs or forensic samples taken.

II. Management Actions

During the period, two PECO employees tested positive. The first employee tested positive as a result of a follow-up test. Unescorted access was denied and employment was later terminated. The second employee tested positive as the result of a random test. Unescorted access was denied.

III. Events Reported Under 10CFR26.73

There were no events other than those reported for Peach Bottom Atomic Power Station (PBAPS) and Limerick Generating Station (LGS) reported to the NRC under 10 CFR 26.73 during the period July 1, 1992 through December 31, 1992.

IV. Nuclear Quality Assurance

During the period, a performance based audit of the Fitness-For-Duty (FFD) program was completed to assess the program's implementation.

The auditors concluded that the FFD program adequately addresses the performance objectives of 10 CFR 26. The audit concluded that "since the last audit, a marked improvement was identified in the area of on-site collection and testing. . ."

The following strengths and weaknesses were identified.

Strengths

- On-site testing facility Site Managers were well qualified and knowledgeable of testing procedures. Also, detailed, well maintained logs were available to document collection and testing activities.

- Collection site personnel were well trained and knowledgeable of their duties and responsibilities.
- The Laboratory Director of the HHS-certified laboratory was extremely knowledgeable in drug abuse problems and the drug testing process and protocols.
- The laboratory staff of the HHS-certified laboratory was knowledgeable of the regulatory requirements and was dedicated to strict observance of process procedures and manuals.
- The HHS-certified laboratory collection/chemical testing procedures were consistent with the requirements set forth by 10 CFR 26 and PECO.
- Medical Review Officer (MRO) activities were well documented and readily retrievable.
- Marked improvement regarding on-site collection/testing implementation by PECO contracted personnel was identified.
- The professionalism and expertise exhibited by PECO FFD staff during the audit provided reasonable assurance of continued compliance to 10 CFR 26 requirements.

Weaknesses

- Documentation deficiencies were noted in a for-cause test of a courier.
- Identification of FFD training deficiencies were not consistently provided to PECO employing officers and contractor management.
- Documentation of the transfer of three specimens collected at the Nuclear Group Headquarters were incomplete.
- Medical Department copies of forms documenting suspension of unescorted access were not properly secured.

Corrective actions have been implemented to resolve the weaknesses which were identified.

V. Random Testing Rate

PECO conducts random testing at an annualized rate of 100%. While PECO maintains separate testing "pools" for employees and contractors, the "average number with unescorted access" includes personnel badged at both PBAPS and LGS.

VI. Additionally Information

On July 1, 1992, barbiturates and benzodiazepines were deleted from the test panel based on a previously conducted review. The review identified that during the two-year period of 1989 and 1990, PECO conducted 22,958 drug tests. Of the 989 presumptive initial (i.e., EMIT) positives, 268 (i.e., 27%) were for barbiturates or benzodiazepines. Of those, only 14 were declared positive by the MRO (i.e., a positive rate of 0.06%). Based on this review, we have concluded that barbiturates and benzodiazepines are not an abuse problem within our workforce.