

August 30, 1994  
ULNRC - 3058



Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Mail Stop P1-137  
Washington, DC 20555

Gentlemen:

In complying with the Fitness For Duty Rule, 10CFR26.71(d), Recordkeeping Requirements, please find enclosed Union Electric's Callaway Nuclear Plant Fitness For Duty Program Performance Data for the six (6) month period beginning January 1, 1994 and ending on June 30, 1994.

Enclosures include:

- Attachment A - Fitness For Duty Program Performance Data  
Personnel Subject to 10CFR26 (2 pages)
- Attachment B - Fitness For Duty (additional statistical data)
- Attachment C - Fitness For Duty Management Action (1 page) in regards to:
  - \* Initiatives Taken
  - \* Lessons Learned
  - \* Reportable Fitness For Duty Events Under 10CFR26.73

If you have any questions in regards to the Performance Data Reported, please contact me at (314) 676-8246.

Sincerely,

A handwritten signature in dark ink, appearing to read "James R. Peavy".

James R. Peavy  
Manager, Emergency Preparedness  
Organizational Support  
Fitness For Duty Manager

RGR  
JRP/RGR/bb  
Enclosures

9409090242 940830  
PDR ADDCK 03000483  
R PDR

AD21

w/attachments

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(2 copies)

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**Fitness For Duty Program  
Performance Data  
Personnel Subject to 10CFR26  
(NUMARC Rev. Date 1/92)**

Union Electric Company	January - June 1994 6 Months
Callaway Plant Location	
Patricia Davis, R. N. Contact Name	(314) 676-4300 Phone (Include Area Code)

Cutoffs:    Screen/Confirmation (ng/ml)                      ☐    Appendix A to 10CFR26

Marijuana	20/ 15	Amphetamines	1000 / 250	Barbiturates	300 / 150
Cocaine	300/ 150	Phencyclidine	25/ 25	Benzodiazepines	300 / 150
Opiates	300/ 150	Alcohol (.04% BAC)			

Testing Results	Licensee Employees		Long-Term Contractor-Personnel		Short-Term Contractor-Personnel	
Average Number with Unescorted Access	943		164		19	
Categories	# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access	32	0	0	0	55	0
Post Accident	0	0	0	0	0	0
Observed Behavior	0	0	0	0	0	0
Random	286	0	53	0	6	0
Follow-up	2	0	0	0	0	0
Other	0	0	0	0	0	0
<b>Total</b>	<b>320</b>	<b>0</b>	<b>53</b>	<b>0</b>	<b>61</b>	<b>0</b>

### Breakdown of Confirmed Positive Tests for Specific Substances

	* Marijuana		Cocaine	* Opiates		* Amphetamines		Phencyclidine	Alcohol	Refusal To Test	1 Barbiturates	2 Benzodiazepines	3	4	5	
Licensee Employees																
Long-Term Contractors																
Short-Term Contractors																
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

\* Left Side - Record of test results that would have been Positive at the NRC cutoff level.

Right Side - Record of MRO Confirmed Positives based on Union Electric's more stringent cutoff level.

There were no confirmed positive tests for this time frame.

## FITNESS FOR DUTY

Below is a summary of Fitness for Duty statistical information for:

	UNION ELECTRIC	CONTRACT / CONSULTANT	TOTALS
Pre-Employment	7	0	7
Pre-Badge	25	55	80
Random	286	59	345
Follow-Up	2	0	2
Post Accident	0	0	0
Test-for-Cause	0	0	0
Appeal/Other	0	0	0
<b>TOTALS</b>	<b>320</b>	<b>114</b>	<b>434</b>
Cumulative Average Population	943	183	1126

Individuals Randomly Screened:

	UNION ELECTRIC	CONTRACT / CONSULTANT	TOTALS
Screened Zero	702	131	833
Screened Once	203	46	249
Screened Twice	33	5	38
Screened Three Times	4	1	5
Screened Four Times	0	0	0
Screened Five Times	1	0	1

### Initiatives/Lessons Learned

It was learned during this reporting period, that 10CFR26 as currently written does not require periodic audit of HHS labs after the pre-award audit.

### Reportable Fitness For Duty Events Under 10CFR26.73

No events requiring reporting occurred during the reporting period.