



Northern States Power Company

414 Nicollet Mall
Minneapolis, Minnesota 55401-1927
Telephone (612) 330-5500

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10 CFR Part 26
Appendix A

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket No. 50-282 License No. DPR-40
50-306 DPR-60

Notification of Deviation from Appendix A to 10 CFR Part 26,
"Guidelines For Nuclear Power Plant Drug and Alcohol Testing Programs"

On June 9, 1994, the U S Department of Health and Human Services (DHHS) published a revision to its drug testing guidelines in the Federal Register (59 FR 29908). The published revision included a reduction in the cutoff level for initial screening tests for marijuana from 100 ng/ml to 50 ng/ml. The provisions of 10 CFR 26.24(b) permit the use of lower levels. 10 CFR Part 26, Appendix A, Subpart A, Section 1.1(2) states:

"Licensees may set more stringent cutoff levels than specified herein or test for substances other than specified herein and shall inform the Commission of such deviation within 60 days of implementing such change."

Northern States Power Company (NSP) implemented, effective September 1, 1994, the 50 ng/ml cutoff level for initial screening tests for marijuana as a testing criteria of our Nuclear Fitness for Duty Program. This criteria is more stringent than the 100 ng/ml cutoff level prescribed by 10 CFR Part 26, Appendix A, Subpart B, Section 2.7(e)(1).

10 CFR Part 26, Appendix A, Subpart B, Section 2.7(e)(1) and Section 2.7(g)(7) require that test results and statistical summary reports of testing be reported at the NRC guideline cutoff levels as well as at the more stringent cutoff level, if a more stringent cutoff level is established. Based on a telephone conversation held with Mr Loren L Bush of the NRC Staff on September 7, 1994, we understand that the intent of these requirements is to obtain data to support revision of the DHHS drug testing guidelines and that testing performed per the DHHS guidelines need only be reported at the DHHS cutoff levels. The laboratory utilized by NSP to perform urine drug testing has been certified by the DHHS to perform tests at the 50 ng/ml level. Performance of the initial screening test for marijuana at the more stringent level of 50 ng/ml per DHHS guidelines by a DHHS certified lab and providing reporting data at this cutoff level will maintain the performance objectives of the Fitness

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for Duty Rule specified in 10 CFR 26.10.

This letter contains no new NRC commitments, nor does it modify any prior commitments. Please contact Marv Engen, Sr Licensing Engineer, at (612) 295-1291 if you require further information.

Roger O Anderson for ROA

Roger O Anderson
Director
Licensing and Management Issues

c: Regional Administrator - III, NRC
NRR Project Manager, NRC
Sr Resident Inspector, NRC
State of Minnesota
Attn: Kris Sanda
J Silberg