



Callaway Plant

July 23, 1991
ULNRC-2442

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station Pl-137
Washington, D.C. 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, 1991 and ending on June 30, 1991.

Enclosures include:

- Attachment A - Fitness For Duty Program Performance Data Personnel Subject to 10CFR26
- Attachment B - Random Testing Program Results/Confirmed Positive Tests for Specific Substances (Five Year Record)
- Attachment C - Fitness For Duty Management Actions 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.

James R. Peevy
Manager-Operations Support
(Fitness For Duty Manager)

JRP/RGR/DMK/bb

9107290210 910723
PDR ADOCK 05000483
R PDR

20000

Mailing Address: P.O. Box 620, Fulton, MO 65251

A021
11

cc: A. Bert Davis, Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

R. L. Hague
Chief, Project Section 3C
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

B. L. Bartlett/D. R. Calhoun
Resident NRC Inspector, Callaway Plant
Callaway Resident Office
U.S. Nuclear Regulatory Commission
RR #1
Steedman, MO 65077

M. D. Lynch
Licensing Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 13-E-21
Washington, DC 20555

Shaw, Pittman, Potts, & Trowbridge
2300 N. Street, N.W.
Washington, DC 20037

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

Union Electric Company		June 30, 1991	
Company		6 Months Ending	
Callaway Nuclear Plant			
Location			
Donna M. Knoepflein		314/676-8211	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	20 / 15	Amphetamines	1000 / 250
Cocaine	300 / 150	Phencyclidine	25 / 25
Opiates	300 / 150	Alcohol (% BAC)	.04%
		<u>Barbiturates</u>	300 / 250
		<u>Benzodiazepines</u>	300 / 250
			/

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access	1033				239		15	
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	30	0			0	0	0	0
Pre-badging	17	0			17	0	10	0
Periodic	0	0			0	0	0	0
For cause	0	0			0	0	0	0
Post accident	0	0			0	0	0	0
Random	526	0			110	1	4	0
Follow-up	4	0			0	0	0	0
Other	2	0			0	0	0	0
Total	579	0	0	0	127	1	14	0

Random Testing Program Results

Individuals Tested	1989	1990	1991	1992	1993
# Positive					
# Tested					
% Positive					
Graph of % Positive					
5					
4					
3					
2					
1					

Confirmed Positive Tests for Specific Substances

Marijuana	0	11	1		
Cocaine	0	4	0		
Opiates	0	0	0		
Amphetamines	0	0	0		
Phencyclidine	0	1	0		
Alcohol	0	1	0		
Benzodiazepines	0	3	0		
Barbiturates	0	1	0		

Fitness For Duty Management Actions

Initiatives Taken

Union Electric purchased additional blind samples spiked with ephedrine to ensure the DHHS Laboratories providing services to Union Electric are not mis-identifying ephedrine in the urine for amphetamines.

Because of reports (within the transportation industry) of some laboratories, during their testing process of urine specimens, mis-identifying ephedrine in the urine for amphetamines, and in discussions between Union Electric's Medical Review Officer and Dr. Willett of Duo Research, it was decided Union Electric would purchase these additional blind samples. These blind samples are structured to challenge the capabilities of laboratories we use to determine if this error, or potential for this error, does exist.

To date, four (4) samples have been utilized for this purpose, three (3) of which have been returned with final results and one (1) of which is still pending.

All four (4) samples were spaced out in the testing process at approximately monthly intervals.

All three (3) specimens for which test results to date are available were tested in our on-site testing facility and at both DHHS Laboratories providing services to Union Electric, and the results have all been negative for amphetamines at all three (3) testing facilities (ie: the correct result).

Lessons Learned

During this reporting period, we experienced an occurrence in which the temperature of a urine specimen measured outside of the acceptable range (low side) of 90.5° F - 99.8° F.

The container in which the specimen is provided holds 120 ml and is a wide base type container. The amount of specimen provided in this case was 10 - 15 ml. This was not an adequate amount of urine specimen to completely submerge the temperature probe.

Fitness For Duty Program Management determined the unacceptable temperature measurement was not due to the specimen being altered or diluted, but was due to the amount of specimen provided was insufficient to obtain an accurate measurement.

Since an accurate temperature measurement could not be obtained, the specimen could not continue to be processed as a partial specimen and was discarded. The individual providing the insufficient specimen was required to repeat the process and did provide an ample specimen approximately 2-3 hours later. The specimen was within the acceptable temperature range and no trace of drugs was indicated in the test results.

At the time of this occurrence, our procedure did not address how this type of situation should be handled.

Subsequent to this occurrence, Fitness For Duty Program Management:

- 1) Requested our Medical Review Officer to evaluate our specimen containers, temperature measuring device, and provide us with a recommendation as to the minimum amount of specimen required in order to obtain an accurate temperature measurement whereas the specimen can be retained and processed as a partial specimen until 60 ml of urine specimen is collected. The MRO's recommendation is 30 ml.
- 2) Our procedure is currently being revised to provide Collection Site Personnel the following guidance:
 - Added definition for: Partial Specimen - A urine specimen that contains, at a minimum, 30 ml of urine, but less than 60 ml of urine.

Lessons Learned (continued)

2)

- Added note in procedure: Note - Urine specimens provided that do not meet the definition of a Partial Specimen (minimum of 30 ml) cannot be processed in accordance with this procedure. In these cases, the insufficient specimen must be discarded and the employee instructed to repeat the process until a sufficient urine specimen can be provided.
- Added paragraph to identify: Urine specimens that measure at a minimum of 30 ml but less than 60 ml are considered partial specimens and are processed as such.

Events Reported In Accordance With 10CFR26.73

No events occurred during this reporting period requiring reporting in accordance with 10CFR26.73.