



PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

February 27, 1995

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

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

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Fitness-for-Duty Program Performance Data for
the Period July 1994 through December 1994

Gentlemen:

As required by 10CFR26.71(d), this letter submits the performance data for our Fitness-for-Duty (FFD) program for the period July 1994 through December 1994. The data for our Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2, sites are provided 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 provided in Attachment 3.

The data are reported on the January 1992 revision of the FFD Performance Data form provided by the Nuclear Energy Institute (NEI), formerly 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.

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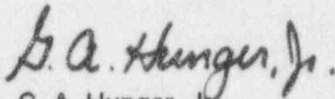
Attachments 1, 2, and 3 also include the following.

- A summary of management actions.
- Analysis of the data and appropriate actions that have been taken.
- Random testing rate.

During this period, there were no events reported to the NRC in accordance with 10CFR26.73.

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

Very truly yours,



G. A. Hunger, Jr.,
Director - Licensing

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC (w/ attachments)
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS (w/ attachments)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ attachments)

ATTACHMENT 1

Peach Bottom Atomic Power Station

Units 2 and 3

Fitness-for-Duty Performance Data

July 1994 through December 1994

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

PECO Energy Company		December 31, 1994	
Company		6 Months Ending	
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	50 / 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		2648 *				1709 *	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		9	0			1140	18
For Cause	Post accident	21	1			8	0
	Observed behavior	5	1			4	1
Random		283	0			277	0
Follow-up		45	4			40	0
Other		9	0			3	0
Total		372	6			1472	19

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

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Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	3	2	0	0	0	1	0						
Long-Term Contractors													
Short-Term Contractors	13	4	1	0	0	1	2						A
Total	16	6	1	0	0	2	2						27

Attachment 1
Summary of Data Analysis and Management Actions
Peach Bottom Atomic Power Station
July - December, 1994

I. Initiatives Taken

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

- A. July 11, 1994 - For cause team sweep of an employee's private vehicle. Results: Three activations. Marijuana and drug paraphernalia discovered. Employee arrested by Pennsylvania State Police, plant access denied and employment terminated.
- B. July 12, 1994 - For cause team sweep of an employee's private vehicle. Marijuana residue discovered. Employee's plant access suspended. Referred to Employee Assistance Program (EAP) for treatment and returned to work on September 9, 1994.
- C. July 12, 1994 - For cause team sweep of an employee's private vehicle. Results: Three activations. Employee admitted off site marijuana use. Employee tested positive, plant access denied and employment terminated.
- D. July 19, 1994 - For cause team sweep of Laydown Area between "C" and "D" cooling towers. Results: One activation. No drugs found or forensic samples taken.
- E. August 5, 1994 - For cause team sweep of an employee's private vehicle. Results: Two activations. Employee admitted off site cocaine use. Plant access denied, employment terminated.
- F. September 7, 1994 - For cause team sweep of a contractor employee's vehicle. Drug paraphernalia discovered. Contractor admitted previous off site drug use. Plant access denied.
- G. September 12, 1994 - General team sweep of Maintenance Tool Room. Results: Thirteen activations. No drugs found or forensic samples taken.
- H. September 12, 1994 - For cause team sweep of an employee's private vehicle. Results: Three activations. No drugs found or forensic samples taken, however, a prohibited offensive weapon was discovered. Employee was disciplined.
- I. September 13, 1994 - For cause team sweep of a contractor employee's private vehicle. Results: Three activations. Marijuana discovered. Plant access denied.
- J. September 13, 1994 - For cause team sweep of a contractor employee's private vehicle. Results: Two activations. Contractor admitted previous off site marijuana use. Plant access denied.

- K. September 13, 1994 - For cause team sweep of a contractor employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- L. September 23, 1994 - General team sweep of the north substation complex. Results: Six activations. No drugs found or forensic samples taken.
- M. September 21, 1994 - For cause team sweep of a contractor employee's private vehicle. Results: Three activations. Contractor admitted off site marijuana and cocaine use in addition to cocaine distribution. Plant access denied.
- N. October 3, 1994 - For cause team sweep of a contractor employee's private vehicle. Results: Three activations. Contractor admitted previous off site marijuana use. Plant access denied.
- O. November 18, 1994 - General team sweep of contractor trailer and contractor's vehicles. Results: Eleven activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, six PECO Energy employees (i.e., four follow-up, one post accident, one observed behavior) tested positive at PBAPS. The employees were provided treatment/rehabilitation through the PECO Energy Employee Assistance Program. Unescorted access was denied for all six employees. Five of the employees (i.e., three voluntary separation, one resignation, and one discharged) have subsequently been terminated. The remaining employee has transferred to a position which does not require unescorted access.

During the period, nineteen contractor employee's (i.e., eighteen pre-access and one observed behavior) tested positive at PBAPS. Unescorted access has been denied for those contractor employees in accordance with PECO Energy's Fitness-For-Duty (FFD) Specification for Contractors.

III. Events Reported Under 10 CFR 26.73

During the period, there were no significant FFD events reported by PBAPS.

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 assessment determined that PECO Energy is effectively implementing the FFD program in compliance with 10 CFR part 26. Noted as significant strengths were:

- A highly competent FFD Staff
- A well-run and responsive Laboratory (DrugScan, Inc.)
- Self-assessment activities.

Weaknesses identified were:

- Documentation deficiencies regarding the medical decision to restore unescorted access to individuals previously denied.
- Laboratory process for validating the screening controls

Corrective actions have been completed.

V. Random Testing Rate

PECO Energy reduced the random testing rate to 50% effective 02/01/94. While PECO Energy maintains separate testing "pools" for employees and contractors, the "average number with unescorted access" includes personnel badged at PBAPS and LGS.

VI. Additional Information

Lower Cut Off Levels

On September 1, 1994, PECO Energy reduced the immunoassay screening cut off level for marijuana to 50 ng/ml. Since the reduced cut off level was implemented there have been twelve confirmed positive test results for marijuana at PBAPS. It is estimated that only four positive tests for marijuana would have been identified using the 100 ng/ml. cut off level.

Attempted Substitution

On July 11, 1994 an employee subject to follow-up testing provided a specimen which had a temperature of 104.2 degrees F. When requested to provide another specimen under direct observation, the employee asked the observer to provide a sample as he "had done something over the weekend." The observer refused and reported the incident. A specimen was collected under direct observation and both specimens were sent for testing. The first specimen was reported as negative. The specimen collected under direct observation was reported as positive for marijuana. During the course of the investigation the individual admitted to substituting a specimen which he had obtained from his son. The employee was discharged.

As a result of this incident the following program enhancements are planned:

1. Provide a collection site within the protected area at each site. This has both business and FFD implications. From a business perspective, it will mean less time away from the job, and from the FFD aspect, it may diminish an individuals ability/options to attempt subversion of the testing.
2. Reduce/minimize the notification time. This also should help diminish an individuals ability/options to attempt subversion of the testing.

3. Enhance Supervisory FFD training to further emphasize recognition of persons who may attempt to subvert testing. This enhanced training will provide supervisors with additional information around behaviors and other signs/symptoms which may indicate a person is preparing to attempt subversion of a FFD test.
4. Periodically reinforce with collection site personnel the need to be constantly on the alert for attempted subversion efforts. This was done immediately following the incident and should be done routinely in order to keep detection skills as sharp as possible.

The following information regarding contractor positives is provided:

<u>Craft</u>	<u>Vital/Protected Area Access</u>	<u>Long/Short Term</u>
Pipefitter	Vital Granted	Short
Engineer	Vital Requested	Long
Pipefitter	Vital Requested	Short
Electrician	Vital Requested	Short
Engineer	Vital Requested	Short
Laborer	Vital Requested	Short
Diver	Vital Requested	Short
Asbestos Worker	Vital Requested	Short
Pipefitter	Vital Requested	Short
Electrician	Vital Requested	Short
Pipefitter	Vital Requested	Short
Pipefitter	Vital Requested	Short
Pipefitter	Vital Requested	Short
Scaffold/Carpenter	Vital Requested	Short
Laborer	Vital Requested	Short
Laborer	Vital Requested	Short
Clerical	Protected Requested	Short
Sprinkler fitter	Vital Requested	Short
Laborer	Vital Requested	Short

ATTACHMENT 2

Limerick Generating Station

Units 1 and 2

Fitness-for-Duty Performance Data

July 1994 through December 1994

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

PECO Energy Company		December 31, 1994	
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	50 / 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		2648 *				1709 *	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		21	0			339	9
For Cause	Post accident	22	1			10	0
	Observed behavior	3	1			5	2
Random		287	1			187	3
Follow-up		57	1			30	0
Other		4	0			1	0
Total		394	4			572	14

* Includes individuals with dual-site access at PBAPS and 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	2	0	1	0	0	1	0						
Long-Term Contractors													
Short-Term Contractors	5	5	0	0	0	5	1						A
Total	7	5	1	0	0	6	1						20

Attachment 2
Summary of Data Analysis and Management Action
Limerick Generating Station
July - December, 1994

I. Initiatives Taken

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

- A. July 27, 1994 - General team sweep of the Control Room and 4th Floor of the Administration Building. Results: No activations. No drugs found or forensic samples taken.
- B. September 27, 1994 - General team sweep of the Limerick Training Center office and classrooms. Results: No activations. No drugs found or forensic samples taken.
- C. December 6, 1994 - General team sweep of the Main Warehouse and Office Area. Results: One activation. No drugs found or forensic samples taken.

II. Management Actions

During the Period, four PECO Energy employees (i.e., one post-accident, one observed behavior, one random, one follow-up) tested positive at LGS. The employees were provided treatment/rehabilitation through the PECO Energy Employee Assistance Program. Unescorted access was denied for all four employees. The four employees (i.e., one resigned, one voluntarily separated, two discharged) were terminated.

During the period, fourteen contractor employees (i.e., nine pre-access, two observed behavior, three random) tested positive at LGS. Unescorted access has been denied for those contractor employees in accordance with PECO Energy's Fitness-For-Duty (FFD) Specification for Contractors.

III. Events Reported Under 10 CFR 26.73

During the period there were no significant FFD events reported by LGS.

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 assessment determined that PECO Energy is effectively implementing the FFD program in compliance with 10 CFR part 26. Noted as significant strengths were:

- A highly competent FFD Staff
- A well-run and responsive Laboratory (DrugScan, Inc.)
- Self-assessment activities.

Weaknesses identified were:

- Documentation deficiencies regarding the medical decision to restore unescorted access to individuals previously denied.
- Laboratory process for validating the screening controls

Corrective actions have been completed.

V. Random Testing Rate

PECO Energy reduced the random testing rate to 50% effective 02/01/94. While PECO Energy maintains separate testing "pools" for employees and contractors, the "average number with unescorted access" includes personnel badged at PBAPS and LGS.

VI. Additional Information

Lower cutoff levels

On September 1, 1994, PECO Energy reduced the immunoassay cutoff level for marijuana to 50 ng/ml. Since the reduced cut off level was implemented there have been three confirmed positive test results for marijuana at LGS. It is estimated that only one positive test for marijuana would have been identified using the 100 ng/ml cut off.

Attempted Substitution

On July 11, 1994 an employee subject to follow-up testing provided a specimen at PBAPS which had a temperature of 104.2 degrees F. When requested to provide another specimen under direct observation, the employee asked the observer to provide a sample as he "had done something over the weekend." The observer refused and reported the incident. A specimen was collected under direct observation and both specimens were sent for testing. The first specimen was reported as negative. The specimen collected under direct observation was reported as positive for marijuana. During the course of the investigation the individual admitted to substituting a specimen which he had obtained from his son. The employee was discharged.

As a result of this incident the following program enhancements are planned:

1. Provide a collection site within the protected area at each site. This has both business and FFD implications. From a business perspective, it will mean less time away from the job, and from the FFD aspect, it may diminish an individuals ability/options to attempt subversion of the testing.
2. Reduce/minimize the notification time. This also should help diminish an individuals ability/options to attempt subversion of the testing.

3. Enhance Supervisory FFD training to further emphasize recognition of persons who may attempt to subvert testing. This enhanced training will provide supervisors with additional information around behaviors and other signs/symptoms which may indicate a person is preparing to attempt subversion of a FFD test.
4. Periodically reinforce with collection site personnel the need to be constantly on the alert for attempted subversion efforts. This was done immediately following the incident and should be done routinely in order to keep detection skills as sharp as possible.

The following information is provided regarding contractor positive tests:

<u>Craft</u>	<u>Vital/Protected Area Access</u>	<u>Long/Short Term</u>
Technician	Vital Granted	Short
Iron Worker	Protected Granted	Short
Pipe Fitter	Vital Requested	Long
Engineer	Vital Requested	Short
Painter	Vital Granted	Short
Carpenter	Vital Requested	Short
Clerical	Protected Requested	Short
Carpenter	Protected Requested	Long
Carpenter	Protected Requested	Short
Carpenter	Protected Requested	Long
Carpenter	Vital Requested	Short
Painter	Protected Requested	Short
Technician	Vital Granted	Short
Carpenter	Vital Granted	Short

ATTACHMENT 3

Corporate and Nuclear Group Headquarters

Fitness-for-Duty Performance Data

July 1994 through December 1994

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

PECO Energy Company		December 31, 1994	
<small>Company</small>		<small>6 Months Ending</small>	
Corporate and Nuclear Group Headquarters			
<small>Location</small>			
David M. Sarley		(215) 841-5703	
<small>Contact Name</small>		<small>Phone (include area code)</small>	
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	50 / 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		2648 *				1709 *	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		1	0			0	0
For Cause	Post accident	3	0			1	0
	Observed behavior	2	0			0	0
Random		120	1			19	0
Follow-up		12	1			0	0
Other		7	0			0	0
Total		145	2			20	0

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

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Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	1	1	0	0	0	0	0						
Long-Term Contractors													
Short-Term Contractors	0	0	0	0	0	0	0						A
Total	1	1	0	0	0	0	0						2

Attachment 3
Summary of Data Analysis and Management Action
Corporate and Nuclear Group Headquarters
July - December, 1994

I. Initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug sniffing canine teams at Corporate and Nuclear Group Headquarters during the period.

- A. September 26, 1994 - General team sweep of the 965 Building, 3rd Floor, Engineering Division. Results: No activations. No drugs found or forensic samples taken.
- B. December 8, 1994 - General team sweep of the 965 Building, 2nd Floor, Nuclear Information Systems, Human Resources, and VP Support Offices. Results: No activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, two PECO Energy Employees (i.e., one follow-up, one random) tested positive. The employees were provided treatment/rehabilitation through the PECO Energy Employee Assistance Program. Unescorted access was denied and the one employee was transferred to a position which did not require unescorted access. The second employee was reinstated to Emergency Operation Facility duties following completion of the prescribed treatment program.

III. Events Reported Under 10 CFR 26.73

There were no events reported during the period.

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 assessment determined that PECO Energy is effectively implementing the FFD program in compliance with 10 CFR part 26. Noted as significant strengths were:

- A highly competent FFD Staff
- A well-run and responsive Laboratory (DrugScan, Inc.)
- Self-assessment activities.

Weaknesses identified were:

- Documentation deficiencies regarding the medical decision to restore unescorted access to individuals previously denied.
- Laboratory process for validating the screening controls

Corrective actions have been completed.

V. Random Testing Rate

PECO Energy reduced the random testing rate to 50% effective 02/01/94. While PECO Energy maintains separate testing "pools" for employees and contractors, the "average number with unescorted access" includes personnel badged at PBAPS and LGS.

VI. Additional Actions

Lower cutoff levels

On September 1, 1994, PECO Energy reduced the immunoassay cutoff level for marijuana to 50 ng/ml. Since the reduced cut off level was implemented there was one confirmed positive test for marijuana at the Nuclear Group Headquarters. It is estimated that the positive test for marijuana would not have been identified using the 100 ng/ml cut off.

Attempted Substitution

On July 11, 1994 an employee subject to follow-up testing provided a specimen at PBAPS which had a temperature of 104.2 degrees F. When requested to provide another specimen under direct observation, the employee asked the observer to provide a sample as he "had done something over the weekend." The observer refused and reported the incident. A specimen was collected under direct observation and both specimens were sent for testing. The first specimen was reported as negative. The specimen collected under direct observation was reported as positive for marijuana. During the course of the investigation the individual admitted to substituting a specimen which he had obtained from his son. The employee was discharged.

As a result of this incident the following program enhancements are planned:

1. Provide a collection site within the protected area at each site. This has both business and FFD implications. From a business perspective, it will mean less time away from the job, and from the FFD aspect, it may diminish an individuals ability/options to attempt subversion of the testing.
2. Reduce/minimize the notification time. This also should help diminish an individuals ability/options to attempt subversion of the testing.
3. Enhance Supervisory FFD training to further emphasize recognition of persons who may attempt to subvert testing. This enhanced training will provide supervisors with additional information around behaviors and other signs/symptoms which may indicate a person is preparing to attempt subversion of a FFD test.
4. Periodically reinforce with collection site personnel the need to be constantly on the alert for attempted subversion efforts. This was done immediately following the incident and should be done routinely in order to keep detection skills as sharp as possible.