

PHILADELPHIA ELECTRIC COMPANY  
 NUCLEAR GROUP HEADQUARTERS  
 955-65 CHESTERBROOK BLVD.  
 WAYNE, PA 19087-5691  
 (215) 640-6000

NUCLEAR ENGINEERING & SERVICES DEPARTMENT

August 27, 1991

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

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

Director  
 Office of Nuclear Reactor Regulation  
 US Nuclear Regulatory Commission  
 Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2  
 Peach Bottom Atomic Power Station, Units 2 and 3  
 Fitness-For-Duty Program Performance Data  
 for the Period January 1991 Through June 1991

Dear Sir:

As required by 10 CFR 26.71(d), this letter submits the performance data for our fitness-for-duty program for the period January 1991 through June 1991. 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 also provided in Attachment 3.

The data are reported on a form acceptable to the NRC as documented in the July 31, 1989 letter from J. M. Taylor (NRC) to J. F. Colvin (Nuclear Management and Resources Council), and include the following.

- . Drugs tested for and cut-off levels, including tests for other drugs (i.e., barbiturates and benzodiazepines).
- . Workforce population tested.

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- . Numbers of tests and results by population and type of test (i.e., pre-judging, random, for-cause, pre-employment, periodic, post-accident, follow-up, and other types of tests).
- . Substances identified.

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

- . Summary of management actions.
- . Analysis of the data and appropriate actions that have been or will be taken.
- . A list of events reported. (Note that there was one event which was reportable in accordance with 10CFR26.73 during this period.)
- . Random testing rate.

Note that the results of drug sweeps at our corporate office and Nuclear Group Headquarters are not available at this time and will be included in the next periodic report of performance data.

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

Very truly yours,



G. J. Beck  
Manager  
Licensing Section

RMK:eas

Attachments

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

## FITNESS FOR DUTY PROGRAM

# Performance Data Personnel Subject to 10CFR 26

Philadelphia Electric Company

COMPANY

June 30, 1991

6 MONTHS ENDING

Peach Bottom Atomic Power Station

LOCATION

D. M. Sarley

CONTACT NAME

(215) 841-5703

PHONE (INCLUDE AREA CODE)

CUTOFFS: SCREEN/CONFIRMATION (ng/ml) ☐ APPENDIX A TO 10CFR 26

MARIJUANA	100 / 15	AMPHETAMINES	1000 / 500	<u>Barbiturates</u>	300/300
COCAINE	300 / 150	PHENCYCLIDINE	25 / 25	<u>Benzodiazepines</u>	300/300
OPIATES	300 / 300	ALCOHOL (% BAC)	0.04%BAC		/

TESTING RESULTS	LICENSEE EMPLOYEES				LONG-TERM CONTRACTOR PERSONNEL		SHORT-TERM CONTRACTOR PERSONNEL	
AVERAGE NUMBER WITH UNESCORTED ACCESS	2931*						2543*	
CATEGORIES	# TESTED	# POSITIVE	# REFERRED TO EAP	# ACCESS RESTORED	# TESTED	# POSITIVE	# TESTED	# POSITIVE
PRE-EMPLOYMENT	20	1					1208	14
PRE-BADGING	14	0					0	0
PERIODIC	18	0					0	0
FOR CAUSE	1	1					2	0
POST ACCIDENT	0	0					0	0
RANDOM	791	1					879	4
FOLLOW-UP	23	0					0	0
OTHER	18	0					20	0
TOTAL	885	3	2	1			2109	18

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

7/21/89

# **RANDOM TESTING PROGRAM RESULTS**

INDIVIDUALS TESTED		1989		1990		1991	1992	1993
# POSITIVE	# TESTED	14 1159	10 1371	5 1307	1 1155	5 1670		
% POSITIVE		1.21%	0.73%	0.38%	0.09%	0.30%		
GRAPH OF % POSITIVE	5							
	4							
	3							
	2							
	1							

## **CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

MARIJUANA	15	7	1	8	12					
COCAINE	11	9	5	5	4					
OPiates	0	0	1	0	3					
AMPHETAMINES	1	2	1	1	1					
PHENCYCLIDINE	1	0	0	0	0					
ALCOHOL	0	0	2	1	3					
Barbiturates	1	0	0	0	1					
Benzodiazepines	0	0	0	0	1					

25 ng/ml. The contractor identified the problem on February 22, 1991 and immediately ceased PCP screening until the correct calibrator was received from the manufacturer (i.e., Syva). Contact with PECO's certified laboratory (i.e., DrugScan, Inc.) indicated that Drug Scan was using the proper screen.

Investigation revealed that the contractor began using the Emit d.a.u. calibrator at our Limerick Generating Station (LGS) on August 21, 1990, and at PBAPS on October 24, 1990, in an attempt to ensure consistency between the on-site lab and the certified lab. Investigation revealed that the on-site lab supervisors failed to recognize the different calibration levels indicated within the literature accompanying the calibration reagents.

During the period, the on-site testing facility had correctly identified all blind proficiency specimens submitted. We also noted that one of the quality control specimens (i.e., 10% of negative screens) submitted to the certified lab was identified as a false negative.

All on-site testing technicians were retrained in the proper methods of calibration reagent preparation and in following instructions contained in the accompanying literature.

#### IV. Random Testing Rate

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

#### V. Policy Revision

On April 1, 1991, the company revised its separate Drug and Alcohol Policies into a single combined Drug and Alcohol Policy and Program.

#### VI. Action Taken to Improve Program

- A. The PECO Human Resources Department is being reorganized. As part of this process, the position of FFD Program Manager is being established. The FFD Program Manager will have clear responsibility for the FFD Program and will report to the Director, Occupational Health and Safety.
- B. All collection site personnel have been retrained with additional emphasis placed on attention to details.
- C. A separate secured access area has been established to ensure access to test results and random testing lists is restricted.

- K. June 13, 1991 - Random search of private vehicles parked near the "A" cooling towers. Results: no activations.
- L. June 26, 1991 - Random team search of the Site Management Building and various rooms in Units 2 and 3. Results: one activation in the Cable Spreading Room, one activation in the Medical Room Elevation 135. No drugs or forensic samples taken.

## II. Management Actions

During the period, two (2) PECO employees (1 Random/1 For-cause) and one (1) applicant tested positive at PBAPS. The two (2) employees were referred to the Employee Assistance Program (EAP) and treatment provided as necessary. Unescorted access was subsequently reinstated for the employee testing positive on the random test after evaluation by the Medical Review Officer. The employee tested for cause has not at this time been reinstated.

During the period, eighteen (18) contractors tested positive (14 pre-employment, 4 random). In accordance with PECO's Fitness-for-Duty (FFD) Specification for contractor's, unescorted access was denied for the fourteen (14) pre-employments. Unescorted access was terminated for the four (4) contractors who tested positive on the random tests.

## III. Events Reported under 10CFR26.73

- A. There were no events which required reporting in accordance with 10CFR26.73 at PBAPS during the reporting period.
- B. During the period, the following potentially reportable events were evaluated as not reportable.
  - 1. During a routine check of training records on January 22, 1991, PECO identified that a number of individuals, listed as supervisors, may not have completed either the initial FFD Supervisory Training within three months of assignment, or the annual refresher training. Immediate notification was made to the Site Support Managers, Security Coordinator, and the Nuclear Support Manager. Resolution of the issue was accomplished through the following actions: supervisory designation was removed from those not actually performing supervisory duties; access was temporarily suspended for those actually involved in supervisory duties until training was completed; and in some cases, posting completed training to the tracking system.
  - 2. On February 26, 1991, the contractor performing on-site immunoassay screening notified the FFD Coordinator that screening for the chemical "PCP," had not been completed properly. The contractor had been using a PCP screen (i.e., Emit-d.a.u.) calibrated at 75 ng/ml as opposed to



Summary of Data Analysis and Management Actions  
Peach Bottom Atomic Power Station  
January - June 1991

I. Initiatives Taken

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

- A. January 18, 1991 - For-cause team search of a private vehicle. Results: multiple activations. Discovery of 50 mg. of suspect substance. Laboratory analysis revealed substance to be marijuana. Plant access revoked.
- B. January 28, 1991 - Random team search of vehicles entering the Protected Area (PA). Results: no activations.
- C. January 29, 1991 - Random team sweep of Plant Services Building, Modification Building (second floor), Access Control Center, Installation Tool Room and Security Management Building. Results: six responses in the tool room; no drugs found or forensic samples taken.
- D. February 1, 1991 - For-cause team search of a private vehicle. Results: two activations. No drugs found or forensic samples taken. Follow-up investigation verified previous off-site drug involvement, as well as the present abuse of alcohol. Plant access revoked.
- E. February 1, 1991 - For-cause team search of a private vehicle. Results: two activations. No drugs found or forensic samples taken. Follow-up investigation verified the individual used drugs off-site from 1974 through 1990. Plant access revoked.
- F. February 28, 1991 - Random Team search of vehicles entering the PA. Results: no activations.
- G. March 28, 1991 - Random team search of vehicles entering the PA. Results: no activations.
- H. March 28, 1991 - Random team search of the first and fourth floors of the Administration Building within the PA, Installation Tool Room, Maintenance offices adjacent to the river, and six PECO vehicles. Results: one activation to PECO vehicle outside the PA. No drugs found or forensic samples taken.
- I. April 30, 1991 - Random team search of the Maintenance Shop and all vehicles inside the PA. Results: no activations.
- J. June 12, 1991 - Random team search of vehicles entering the PA. Results: no activations.

## FITNESS FOR DUTY PROGRAM

# Performance Data

## Personnel Subject to 10CFR 26

Philadelphia Electric

COMPANY

June 30, 1991

6 MONTHS ENDING

Limerick Generating Station

LOCATION

D. M. SARLEY

CONTACT NAME

(215) 841-5703

PHONE (INCLUDE AREA CODE)

CUTOFFS: SCREEN/CONFIRMATION (ng/ml) ☐ APPENDIX A TO 10CFR 26

MARIJUANA 100 / 15    AMPHETAMINES 1000 / 500    Barbiturates 300 / 300  
 COCAINE 300 / 150    PHENCYCLIDINE 25 / 25    Benzodiazepines 300 / 300  
 OPIATES 300 / 300    ALCOHOL (% BAC) 0.04%BAC    \_\_\_\_\_ /

TESTING RESULTS	LICENSEE EMPLOYEES				LONG-TERM CONTRACTOR PERSONNEL		SHORT TERM CONTRACTOR PERSONNEL	
AVERAGE NUMBER WITH UNESCORTED ACCESS	2931*						251*	
CATEGORIES	# TESTED	# POSITIVE	# REFERRED TO EAP	# ACCESS RESTORED	# TESTED	# POSITIVE	# TESTED	# POSITIVE
PRE-EMPLOYMENT	8	0					968	13
PRE-BADGING	49	0					0	0
PERIODIC	0	0					0	0
FOR CAUSE	1	1					3	0
POST ACCIDENT	0	0					2	0
RANDOM	704	2					646	3
FOLLOW-UP	13	0					0	0
OTHER	2	0					0	0
TOTAL	777	3	3	3			1619	16

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

7/21/89



# **RANDOM TESTING PROGRAM RESULTS**

RANDOM TESTING PROGRAM RESULTS											
INDIVIDUALS TESTED		1989		1990		1991		1992		1993	
# POSITIVE	# TESTED	15 2062	13 1646	4 1249	2 1037	5 1350					
% POSITIVE		0.73%	0.79%	0.32%	0.19%	0.4%					
GRAPH OF % POSITIVE		5									
		4									
		3									
		2									
		1									

## **CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

MARIJUANA	38	8	5	11	7						
COCAINE	43	14	2	12	8						
OPiates	2	1	1	0	0						
AMPHETAMINES	5	0	0	1	0						
PHENCYCLIDINE	0	0	0	0	0						
ALCOHOL	0	0	1	1	4						
Barbiturates	0	0	1	0	0						
Benzodiazepines	4	0	0	2	0						

Summary of Data Analysis and Management Actions  
Limerick Generating Station  
January - June 1991

I. Initiatives Taken

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

- A. February 5, 1991 - For cause team search of a contractor's vehicle. Results: three activations. A field test of suspected controlled substance was negative.
- B. February 28, 1991 - Random team sweep of LGS Personnel Processing Center. Results: ten activations. One activation resulted in the location of a prescription drug. No other drugs were found or forensic samples taken.
- C. March 27, 1991 - Random team sweep of Receiving Warehouse. Results: twelve activations. No drugs found or forensic samples taken.
- D. April 9, 1991 - For cause team search of bathroom in the Protected Area (PA) where a plastic bag was found taped to the inside of a stall. Results: no activations or forensic samples taken.
- E. April 29, 1991 - For cause team search of a leased vehicle brought onto site property. Results: three activations. A field test of ash residue was negative.
- F. May 25, 1991 - Random team sweep of the first floor of the LGS Site Support Building. Results: ten activations. No drugs found or forensic samples taken.
- G. June 14, 1991 - For cause team search of a contractor's vehicle. Result: three activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, three (3) PECO employees tested positive at LGS. Two (2) of the employees tested positive as a result of random testing. The third was the result of a "For Cause" test.

As this was the first occurrence for each of these employees, their unescorted access was suspended for the fourteen (14) days required. They were referred to PECO's Employee Assistance Program (EAP) for assessment and treatment, as necessary. Following treatment, the individuals were evaluated by the Medical Review Officer (MRO) for return to nuclear work. All subsequently passed drug and alcohol testings and were cleared by the MRO. They subsequently obtained management approval and unescorted access was regranted.

During the period a total of sixteen contractors tested positive (13 preemployment/3 random). In accordance with PECO's Fitness-for-Duty (FFD) specification for contractors, unescorted access was denied for the thirteen individuals seeking unescorted access. Access was terminated for the three individuals testing positive through the random testing process.

### III. Events Reported under 10CFR26.73

- A. There was one event reported to the NRC under 10CFR26.73 during the first six months of 1991.

On April 5, 1991, a contractor supervisor working in our Training Division randomly tested positive on an alcohol breathalyzer. Blood test confirmed on April 9, 1991, that alcohol levels exceeded acceptable limits. On April 5, 1991, access was denied to the protected area of the plant. On April 9, 1991, the contractor employee was denied access to any PECO property and remains forbidden to do work for PECO.

- B. During the period, the following potentially reportable events were evaluated as not reportable.

1. During a routine check of training records on January 22, 1991, PECO identified that a number of individuals, listed as supervisors, may not have completed either the initial FFD Supervisory Training within three months of assignment, or the annual refresher training. Immediate notification was made to the Site Support Managers, Security Coordinators, and the Nuclear Support Manager. Resolution of the issue was accomplished through the following actions: supervisory designation was removed from those not actually performing supervisory duties; access was temporarily suspended for those actually involved in supervisory duties until training was completed; and in some cases, posting completed training to the tracking system.
2. On February 26, 1991, the contractor performing on-site immunoassay screening notified the FFD Coordinator that screening for the chemical "PCP," had not been completed properly. The contractor had been using a PCP screen (i.e., Emit-d.a.u.) calibrated at 75 ng/ml as opposed to 25 ng/ml. The contractor identified the problem on February 22, 1991, and immediately ceased screening until the correct calibrator was received from the manufacturer (i.e., Syva). Contact with PECO's certified laboratory (i.e., DrugScan, Inc.) indicated that Drug Scan was using the proper screen.

Investigation revealed that the contractor began using the Emit d.a.u. calibrator at LGS on August 21, 1990, and at the Peach Bottom Atomic Power Station (PBAPS) on October 24, 1990, in an attempt to ensure consistency between the on-site testing facility and the certified lab. Investigation revealed that the lab supervisors failed to recognize the different calibration levels indicated within the literature accompanying the calibration reagents.

During the period, the on-site testing facility had correctly identified all blind proficiency specimens submitted. We also noted that one of the quality control specimens (i.e., 10% of negative screens) submitted to the certified lab was identified as a false negative.

All on-site testing technicians were retrained in the proper methods of calibration reagent preparation and in following instructions contained in the accompanying literature.

#### IV. Random Testing Rate

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

#### V. Policy Revision

On April 1, 1991, the company revised its separate Drug and Alcohol Policies into a single combined Drug and Alcohol Policy and Program.

#### VI. Action Taken to Improve Program

- A. The PECO Human Resources Department is being reorganized. As part of this process, the position of FFD Program Manager is being established. The FFD Program Manager will have clear responsibility for the FFD Program and will report to the Director, Occupational Health and Safety.
- B. All collection site personnel have been retrained with additional emphasis placed on attention to details.
- C. A separate secured access area has been established to ensure access to test results and random testing lists is restricted.

## FITNESS FOR DUTY PROGRAM

Performance Data  
Personnel Subject to 10CFR 26

Philadelphia Electric Company

COMPANY

Corporate and Nuclear Group Headquarters

LOCATION

D. M. SARLEY

CONTACT NAME

June 30, 1991

6 MONTHS ENDING

(215) 841-5703

PHONE (INCLUDE AREA CODE)

CUTOFFS: SCREEN/CONFIRMATION (ng/ml) ☐ APPENDIX A TO 10CFR 26

MARIJUANA 100 / 15 AMPHETAMINES 1000 / 500 Barbiturates 300 / 300  
 COCAINE 300 / 150 PHENCYCLIDINE 25 / 25 Benzodiazepines 300 / 300  
 OPIATES 300 / 300 ALCOHOL (% BAC) 0.04%BAC /

TESTING RESULTS	LICENSEE EMPLOYEES				LONG-TERM CONTRACTOR PERSONNEL		SHORT-TERM CONTRACTOR PERSONNEL	
AVERAGE NUMBER WITH UNESCORTED ACCESS	931*						2543*	
CATEGORIES	# TESTED	# POSITIVE	# REFERRED TO EAP	# ACCESS RESTORED	# TESTED	# POSITIVE	# TESTED	# POSITIVE
PRE-EMPLOYMENT	49	1					8	2
PRE-BADGING	18	0					0	0
PERIODIC	1	0					0	0
FOR CAUSE	0	0					0	0
POST ACCIDENT	0	0					0	0
RANDOM	268	0					11	0
FOLLOW-UP	15	1					0	0
OTHER	10	0					0	0
TOTAL	361	2	1	0			19	2

\* Includes personnel with dual-site access at PBAPS and LGS

7/21/89

# **RANDOM TESTING PROGRAM RESULTS**

INDIVIDUALS TESTED		1989		1990		1991		1992		1993	
# POSITIVE	# TESTED	2 303	5 395	0 253	1 227	0 279					
% POSITIVE		0.66%	1.27%	0.00%	0.44%	0.00%					
GRAPH OF % POSITIVE	5										
	4										
	3										
	2										
	1										

## **CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

MARIJUANA	22	25	13	12	2					
COCAINE	45	42	21	14	2					
OPiates	2	7	0	1	0					
AMPHETAMINES	0	2	1	0	0					
PHENCYCLIDINE	0	0	0	0	0					
ALCOHOL	0	0	8	4	1					
Barbiturates	2	0	0	0	0					
Benzodiazepines	1	2	1	0	0					



Summary of Data Analysis and Management Actions  
Corporate Office and Nuclear Group Headquarters  
January - June 1991

I. Initiatives Taken

Sweeps by drug sniffing canines were conducted at the Philadelphia Electric Company's (PECo's) corporate office and Nuclear Group Headquarters during the period. Reports of these sweeps are not available at this time and will be included in the next periodic report of performance data.

On February 19, 1991, a collection site was established at the Nuclear Group Headquarters in Wayne, Pennsylvania. This facility was established to reduce the lost-time impact for individuals selected to participate in the random testing program.

II. Management Actions

During the period, one (1) PECO employee (follow-up) and one (1) applicant tested positive. The applicant who tested positive was not hired. The employee testing positive was in the follow-up program as a result of two (2) previous positive tests. Unescorted access for the individual had previously been denied. The employee was subsequently terminated.

Two (2) contractor applicants also tested positive and were not hired or granted access.

III. Events Reported under 10CFR26.73

- A. No events occurred during the period that require reporting under 10CFR26.73.
- B. During the period, the following potentially reportable events were evaluated as not reportable.
  - 1. During a routine check of training records on January 22, 1991, PECO identified that a number of individuals, listed as supervisors, may not have completed either the initial Fitness-for-Duty (FFD) Supervisory Training within three months of assignment, or the annual refresher training. Immediate notification was made to the Site Support Managers, Security Coordinators, and the Nuclear Support Manager. Resolution of the issue was accomplished through the following actions: supervisory designation was removed from those not actually performing supervisory duties; access was temporarily suspended for those actually involved in supervisory duties until training was completed; and in some cases, posting completed training to the tracking system.

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- B. All collection site personnel have been retrained with additional emphasis placed on attention to details.
- C. A separate secured access area has been established to ensure access to test results and random testing lists is restricted.