

Detroit  
Edison

William S. Orser  
General Vice President

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10CFR26.71(d)

February 28, 1992  
NRC-92-0012



Nuclear  
Operations

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

- References:
- 1) Fermi 2  
NRC Docket No. 50-341  
NRC Licensing No. NPF-43
  - 2) Semi-Annual Fitness For Duty Report  
July 1, 1990 to December 31, 1990,  
Detroit Edison letter NRC-91-0025  
dated February 28, 1991
  - 3) Semi-Annual Fitness For Duty Report  
January 1, 1991 to June 30, 1991,  
Detroit Edison letter NRC-91-0104  
dated August 29, 1991

Subject: Semi-Annual Fitness for Duty Report

In accordance with 10CFR26.71(d), enclosed (Attachment 1) is the Semi-Annual Fitness for Duty (FFD) Report for Fermi 2 for the period from July 1, 1991 to December 31, 1991.

As a result of issues identified in an internal Quality Assurance audit, a number of management actions to strengthen the FFD program are being taken, as summarized in Section 3, page 2 of Attachment 1.

This report also provides corrected confirmed positive testing data for the last half of 1990 and the first half of 1991 as noted in Section 2 of Attachment 1. This corrects data previously provided by References 2 and 3. An explanation of these corrections is provided in Section 3, (page 2) of Attachment 1.

During this period, there were no reportable events at Fermi 2 per 10CFR26.73.

Also included with this submittal, as Attachment 2, is a revised "Section 1" for the Semi-Annual FFD report for the period from January 1, 1991 through June 30, 1991 previously provided by Reference 3. An explanation of the corrections made to this sheet is provided in Section 3 (page 2) of Attachment 1.

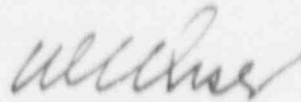
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If there are any questions with regard to this report, please contact  
Mr. Joseph H. Korte, Deputy Director, Nuclear Security, at (313)  
586-4949.

Sincerely,



Attachments

cc: T. G. Colburn  
A. B. Davis  
R. W. DeFayette  
G. Pirtle  
S. Stasek  
Region III

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

## SECTION 1

THE DETROIT EDISON COMPANY		DECEMBER 31, 1991	
Company		6 Months Ending	
ENRICO FERMI 2			
Location			
JOSEPH H. KORTE		(313) 586-1095	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol (% BAC)	/

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access	1075				N/A		213	
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Pre-badging	31	0	0	0	N/A	N/A	75	2
Periodic	0	0	0	0	N/A	N/A	0	0
For cause	2	0	0	0	N/A	N/A	4	2
Post accident	0	0	0	0	N/A	N/A	0	0
Random	537	1	1	1	N/A	N/A	93	1
Follow-up	12	0	0	0	N/A	N/A	6	0
Other	0	0	0	0	N/A	N/A	0	0
Total	582	1	1	1	N/A	N/A	178	5

### Random Testing Program Results

Individuals Tested	1989	1990	1991	1992	1993
# Positive		2	3*	2	
- Tested		761	1196	630	
% Positive					

Graph of % Positive	5	4	3	2	1
1st Half 90 - .26					
2nd Half 90 - .39					
1st Half 91 - .25*					
2nd Half 91 - .32					

December 91'

SECTION 2

### Confirmed Positive Tests for Specific Substances

Marijuana	5	1	17	3			
Cocaine	1	2	17	0			
Opiates	1	0	0	0			
Amphetamines	0	0	0	0*			
Phencyclidine	0	0	0	0			
Alcohol	1	1*	0*	2			

\* = Shows corrected figures. See "Management Actions", DER 91-0630

SECTION 3  
FITNESS FOR DUTY PROGRAM  
PERFORMANCE DATA

- 1) Pre-employment physicals are tabulated in the pre-badging category figures.
- 2) Our testing rate in the Random Test Program for this reporting period was 46% (average pool size was 1378, total tested was 630). The prior reporting period testing rate was 58%, resulting in a year end testing rate of 104%.
- 3) During this testing period, our contract laboratory was decertified by HHS and a new laboratory was audited. Our primary laboratory was recertified by HHS on February 4, 1992

TESTING RESULTS

There were six (6) positive tests for the period ending December 31, 1991. The positive tests are categorized as follows:

Pre-Badging Testing

A total of two (2) contract employees tested positive. Both individuals tested positive for marijuana. Both persons were denied access.

For-Cause Testing

A total of two (2) contract employees tested positive. Both individuals tested positive for alcohol. One individual was a building cleaner (outside of the Radiologically Controlled Area) and the other was a clerk typist (outside of the Protected Area). Both individuals were identified by their respective supervisors. Access was terminated for both individuals.

Random Testing

There were a total of two (2) positive Random Tests. One (1) licensee employee failed to appear for their scheduled random and was administratively ruled positive. The individual was referred to EAP and placed in the Follow-Up Testing program. Sanctions were imposed on the individual as required and access restored. The other positive test was a contract building cleaner who tested positive for marijuana and was terminated.

A review of both individuals past work practice was conducted and no poor work performance had been identified.

SECTION 3  
FITNESS FOR DUTY PROGRAM  
PERFORMANCE DATA

SUMMARY OF MANAGEMENT ACTIONS

A total of four (4) Deviation Event Reports (DER) were written identifying deficiencies in the Fitness For Duty Program during this reporting period.

DER 91-0630 documents that on-site medical staff work instructions differed from approved site program procedures in the conduct of blood alcohol testing. The medical staff work instructions failed to require a confirmatory breath analysis alcohol test upon receiving a presumptive positive test. The use of medical work instructions was stopped and direction was provided to use only site approved program procedures. A review was performed and it was determined that twelve (12) individuals had received sanctions imposed, as required by 10CFR26.27, where a confirmatory test had not been conducted. The twelve individual's records have been corrected to reflect this error and the data in Section 2 of this report has been modified to reflect these changes. This issue is currently under evaluation by Region III.

DER 91-0679 documented during an NQA Surveillance that several licensee and contract supervisors had not received Continual Behavior Observation Program (CBOP) training within the required 90 days. During the recent refuel outage (second quarter, 1991) several contractors were brought on site. Some of those were made supervisors, completed their jobs, and terminated employment (less than 90 days) before receiving CBOP training. Site procedures were revised to require that new-to-site supervisors (both licensee and contractor) receive CBOP training prior to receiving their unescorted access. Department Heads were advised of the need to have supervisors receive initial/requalification CBOP training.

DER 91-0935 documented during an NQA Audit a failure to maintain a calibration program for devices used to perform blood alcohol test analysis. Work practices have been changed and procedures are in the process of being strengthened to correct the deficiency. This issue is currently under evaluation by Region III.

DER 91-0943 documented during an NQA Audit a problem of not submitting blind sample specimens with actual specimens to the laboratory for analysis and not sending an adequate number of blind specimens per quarter for analysis. Work practices have been changed and procedures are in the process of being strengthened to correct the deficiency. This issue is currently under evaluation by Region III.

In addition, DER 91-0943 documents an error made in counting the number of specimens collected during the first half of 1991 and reported in the semi-annual FFD report for that period. Corrected data is provided in Attachment 2. Work practices have been changed to strengthen tracking numbers of specimens collected.

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

Attachment 2

SECTION 1

THE DETROIT EDISON COMPANY		JUNE 30, 1991	
Company		6 Months Ending	
ENRICO FERMI 2			
Location			
JOSEPH H. KORTE		(313) 586-1095	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol (% BAC)	/

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access	1070		#	#	N/A		823	
Categories	# Tested	# Positive	Referred to EAP	Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Pre-bagging	22*	0	0	0	N/A	N/A	1718*	2*
Periodic	390	0	0	0	N/A	N/A	17	0
For cause	1	0	0	0	N/A	N/A	8*	1*
Post accident	0	0	0	0	N/A	N/A	0	0
Random	711	1	1	1	N/A	N/A	485	2*
Follow-up	8*	1	1	0	N/A	N/A	4*	0*
Other	0	0	0	0	N/A	N/A	0	0
Total	1132*	2	2	1	N/A	N/A	2232*	31*

\* = Show corrected figures