

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

August 28, 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 January 1995 through June 1995

Gentlemen:

As required by 10CFR26.71(d), this letter submits the performance data for our Fitness-for-Duty (FFD) program for the period January 1995 through June 1995. 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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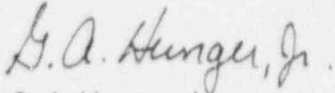
Attachments 1, 2, and 3 also include the following.

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

During this period, there was one (1) significant event reported to the NRC in accordance with 10CFR26.73, as described in Attachment 2 of this letter.

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

January 1995 through June 1995

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

Peco Energy Company		June 30, 1995	
Company		6 Months Ending	
Peach Bottom Atomic Power Station			
Location			
David M. Sarley		(215) 841-5703	
Contract 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		2523				1648	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		17	0			203	0
For Cause	Post accident	7	0			0	0
	Observed behavior	5	2			1	0
Random		267	1			204	0
Follow-up		28	0			17	0
Other		7	0			3	0
Total		331	3			428	0

# Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	1					2							
Long-Term Contractors													
Short-Term Contractors													A
Total	1					2							3

**Summary of Data Analysis and Management Actions  
Peach Bottom Atomic Power Station  
January - June 1995**

I. Initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug sniffing canine teams as well as investigations and interviews used to confirm information about illicit activities at Peach Bottom Atomic Power Station (PBAPS) during the period.

- a. January 31, 1995 - General team sweep of the Document Control Section. Results: Four activations. No drugs found or forensic samples taken.
- b. February 28, 1995 - General team sweep of the South Substation Control House. Results: No activations.
- c. March 14, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. However, an open alcohol beverage container was discovered in plain view. Employee tested positive for alcohol. Plant access denied.
- d. March 31, 1995 - General team sweep of the North Substation. Results: Four activations. No drugs found or forensic samples taken. An opened container of vodka was found in a Company vehicle. Employee admitted to purchasing the vodka. Employee disciplined and plant access denied.
- e. March 31, 1995 - General team sweep of the Plant Services Building, first floor. Results: Two activations. No drugs found or forensic samples taken.
- f. May 4, 1995 - General team sweep of Laydown Area between "C" and "D" cooling towers. Results: Two activations. No drugs found or forensic samples taken.
- g. May 22, 1995 - For cause team sweep of a Company vehicle and employee's possessions. Results: Three activations. No drugs found or forensic samples taken.
- h. May 25, 1995 - For cause team sweep of employee's possessions and private vehicle. Results: Four activations. Employee denied illegal drug use, but tested positive for marijuana. Plant access denied.
- i. May 26, 1995 - General team sweep of five different owner controlled areas and one Company vehicle. Results: No activations.
- j. June 16, 1995 - General team sweep of one contractor vehicle and twelve Company vehicles. Results: Four activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, three PECO Energy employees (i.e., one random, two observed behavior) tested positive at PBAPS. Unescorted access was denied for all three employees. The employees were provided treatment and rehabilitation through the PECO Energy Employee Assistance Program. One employee has subsequently been granted unescorted access. The other two employees have been assigned to duties which do not require unescorted access.



III. Events Reported Under 10 CFR 26.73

There were no significant FFD events reported by PBAPS during the period.

IV. Audits/Inspections

During the period, the NRC Region I conducted a reactive FFD inspection (Inspection Report Nos. 50-352/95-08 and 50-353/95-08). The inspection was primarily conducted at Limerick Generating Station (LGS), but examined aspects of the program across the Nuclear Group. A summary of the inspection findings is reported under Attachment 2, "Summary of Data Analysis and Management Action, Limerick Generating Station."

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS.

VI. Additional InformationActions Taken Based Upon Unconfirmed On-site Screening

PECO Energy has decided to temporarily suspend access for individuals as permitted by 10CFR26.24(d).

During the previous 6-month reporting period, (i.e., July - December 1994), 100% of the specimens which were determined to be presumptively positive for cocaine as a result of preliminary on-site screening tests were subsequently reported as positive by the HHS-certified laboratory. The confirmation rate for marijuana was less than the required 85 percent; therefore, no action was taken on specimens identified as presumptive positive for marijuana.

During this reporting period there were two specimens which were identified as presumptive positive for marijuana as a result of on-site screening. Laboratory screening resulted in one of those specimens screening positive. The specimen was also confirmed positive by the HHS-certified laboratory. The Medical Review Officer (MRO) verified that specimen as positive following discussion with the individual. Administrative actions were not taken until after the MRO determinations and only against the individual with the confirmed positive test.

Reduced Marijuana Cut-off Level

During the period, there was one confirmed positive test for marijuana at PBAPS. The specimen would not have tested positive using the 100 ng/ml immunoassay cut-off level.

## **ATTACHMENT 2**

Limerick Generating Station

Units 1 and 2

Fitness-for-Duty Performance Data

January 1995 through June 1995



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

<u>Peco Energy Company</u>		June 30, 1995	
Company		6 Months Ending	
<u>Limerick Generating Station</u>			
Location			
<u>David M. Sarley</u>		(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		2523				1648	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		45	0			1001	16
For Cause	Post accident	22	0			8	0
	Observed behavior	15	0			7	4
Random		299	0			192	0
Follow-up		67	0			19	0
Other		4	0			1	0
Total		452	0			1228	20

# Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees													
Long-Term Contractors													
Short-Term Contractors	9	5		2		8	2						A
Total	9	5		2		8	2						26

Summary of Data Analysis and Management Actions  
Limerick Generating Station  
January - June 1995

I. initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug sniffing canine teams as well as investigations and interviews used to confirm information about illicit activities at Limerick Generating Station (LGS) during the period.

- a. January 5, 1995 - Unidentified pill found in the Protected Area. Laboratory analysis indicated over-the-counter medication.
- b. January 25, 1995 - Information developed from an informant indicating alleged drug use by Health Physics employees. Investigation initiated. Credible allegations were substantiated against twelve employees and two contractors.
- c. February 2, 1995 - General team sweep of the Health Physics field office. Results: Three activations. No drugs found or forensic samples taken.
- d. February 10, 1995 - General team sweep of the Materials Management facility. Results: No activations.
- e. February 11, 1995 - For cause team sweep of a supervisory employee's private vehicle. Results: One activation. No drugs found or forensic samples taken. Employee interviewed and admitted off-site drug use. The employee resigned.
- f. February 11, 1995 - For cause team sweep of an employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Employee interviewed and admitted off-site drug use, distributing drugs to other employees, and hydration to avoid detection. Employee resigned.
- g. February 12, 1995 - For cause team sweep of supervisory employee's private vehicle. Results: No activations. Employee interviewed and admitted off-site drug use. Employee resigned.
- h. February 12, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed and admitted off site drug use, selling and distributing drugs to other employees, and hydration to avoid detection. Employee resigned.
- i. February 13, 1995 - For cause team sweep of supervisory employee's private vehicle. Results: No activations. Employee interviewed and admitted off-site drug use and hydration to avoid detection. Employee dismissed.
- j. February 13, 1995 - For cause team sweep of an employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Employee interviewed but denied illegal drug use. No further action taken.
- k. February 13, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed but denied illegal drug use. No further action taken.

- i. February 13, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed and admitted off-site drug use. Employee's access was denied.
- m. February 15, 1995 - For cause team sweep of a contractor's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Contractor interviewed but denied illegal drug use. Investigation established that contractor employee was involved in the off-site distribution, sale, and use of drugs. Contractor employee denied access.
- n. February 15, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed and admitted off-site drug use. Employee access denied.
- o. February 17, 1995 - For cause team sweep of an employee's private vehicle. Results: Four activations. Forensic samples taken. Laboratory analysis proved negative. Employee interviewed and admitted off-site drug use and distributing drugs to other employees. Employee resigned.
- p. February 21, 1995 - General team sweep of all Health Physics work areas. Results: Thirteen activations. Forensic samples taken. Laboratory analysis proved negative.
- q. February 21, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed but denied illegal drug use. No further action taken.
- r. February 22, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed but denied illegal drug use. No further action taken.
- s. February 22, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed but denied illegal drug use. No further action taken.
- t. February 24, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed and admitted off-site drug use. Employee denied access.
- u. March 7, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed and admitted off-site drug use. Employee denied access.
- v. March 7, 1995 - For cause team sweep of an employee's private vehicle. Results: No activations. Employee interviewed and admitted off-site drug use. Employee denied access.
- w. March 22, 1995 - For cause interview of contractor employee based upon credible allegation. Results: Contractor denied drug use. Investigation established that the contractor employee was involved in off-site drug use. Contractor employee denied access.

- x. April 4, 1995 - General team sweep of the cafeteria area. Results: Five activations. No drugs found or forensic samples taken.
- y. May 23, 1995 - For cause search (no dog used) of contractor's private vehicle based upon developed information. Results: Containers of alcohol found on-site (outside of Protected Area). Contractor interviewed and admitted alcohol use. Contractor employee tested positive for alcohol. Contractor employee denied access.
- z. May 23, 1995 - Contractor employee tested for cause based upon developed investigative information. Results: Positive for illegal drug. Contractor employee denied access.
- aa. June 1, 1995 - General team sweep of construction area within the Administration Building. Results: Ten activations. No drugs found or forensic samples taken.
- bb. June 1, 1995 - For cause team sweep of a contractor's private vehicle. Results: Four activations. No drugs found or forensic samples taken.

## II. Management Actions

During the period, twenty contractor employees (i.e., sixteen pre-access, four observed behavior) tested positive at LGS. Unescorted access was denied for all twenty contractor employees.

## III. Events Reported Under 10 CFR 26.73

During the period there was one significant FFD event reported by telephone under 10CFR26.73 by LGS.

The report contained information developed during an investigation regarding allegations and admissions of three supervisory personnel being involved in the off-site use and possession of a controlled substance. The supervisors involved were denied access to PECO Energy nuclear facilities and records documented as such for employment inquiries from other nuclear licensees subject to 91-03 data transfer. Two of the supervisors subsequently resigned from employment, the third was discharged.

Non-supervisory personnel identified during the course of this investigation who did not resign were referred to the Employee Assistance Program for treatment. Following satisfactory completion of treatment, the employees unescorted access was reinstated.

The investigation also identified two non-supervisory contractor personnel who were involved in off-site drug use. The contractor personnel were denied access. The denial of access was communicated by telephone to the nuclear licensees where the contractor personnel were then working.

All personnel identified during the investigation submitted to for cause drug and alcohol testing. None tested positive.

IV. Audits/Inspections

The NRC Region I conducted a reactive FFD inspection, as documented in Inspection Report Nos. 50-352/95-08 and 50-353/95-08, in response to the significant FFD event reported above. The inspection was primarily conducted at LGS, but examined aspects of the program across the Nuclear Group.

The inspection identified that PECO Energy had in place a FFD program which continued to be implemented for the protection of the public health and safety. The report commended PECO Energy's efforts in identifying the noncompliance of certain employees with the FFD program, and for taking prompt, appropriate action. The inspector reported an "apparent" violation in that supervisors with behavioral observation responsibilities failed to require for cause testing of individuals following observed behavior indicating substance abuse.

The report identified issues involving implementation of program changes, documentation of procedures for the notification of personnel selected for testing, and individuals excused from testing.

The issues have been reviewed and corrective actions are in progress.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS.

VI. Additional Information

Actions Taken Based Upon Unconfirmed On-site Screening

PECO Energy has decided to temporarily suspend access for individuals as permitted by 10CFR26.24(d).

During the previous 6-month reporting period, (i.e., July - December 1994), 100% of the specimens which were determined to be presumptively positive for cocaine as a result of preliminary on-site screening tests were subsequently reported as positive by the HHS-certified laboratory. The confirmation rate for marijuana was less than the required 85 percent; therefore, no action was taken on specimens identified as presumptive positive for marijuana.

During this reporting period there were four specimens identified as presumptive positive for cocaine as a result of on-site screening. The four specimens were also screened positive and reported as confirmed positive by the HHS-certified laboratory. The Medical Review Officer (MRO) verified the four specimens as positive following discussion with the individuals. Three of the specimens were collected as part of pre-access testing; therefore, the temporary suspension of access was not applicable. The fourth specimen was collected based upon a for cause event and the individual's unescorted access was temporarily suspended. Upon MRO verification, unescorted access was denied.



During this reporting period there were eighteen specimens identified as presumptive positive for marijuana as a result of on-site screening. Eleven of those specimens screened positive and ten were reported as confirmed positive by the HHS-certified laboratory. The MRO verified the ten specimens as positive following discussion with the individuals. Administrative actions were not taken until after the MRO determinations and only against the individuals with the confirmed positive tests. (The performance data report breakdown reflects only nine marijuana positives as one individual tested positive on two specimens collected the same date.)

#### Reduced Marijuana Cut-off Level

During the period, there were nine confirmed positive tests for marijuana at LGS. Eight of the specimens would not have tested positive using the 100 ng/ml immunoassay cut-off level.

#### Contractor Information

The following information regarding contractor positive is provided:

<u>Craft</u>	<u>Vital/Protected Area Access</u>	<u>Long/Short Term</u>
Electrician	Vital Granted	Short
Asbestos Worker	Vital Granted	Short
Laborer	None Requested	Short
Carpenter	Vital Requested	Short
Carpenter	Vital Requested	Short
Boilermaker	Vital Requested	Long
Pipefitter	Vital Requested	Short
Electrician	Vital Requested	Long
Laborer	None Requested	Short
Electrician	Vital Requested	Short
Asbestos Worker	Vital Requested	Long
Asbestos Worker	Vital Requested	Long
Iron Worker	Vital Requested	Long
Technician	Vital Requested	Short
Technician	Vital Requested	Short
Pipefitter	Vital Requested	Long
Technician	Vital Requested	Short
NDE/ISI Inspector	Vital Requested	Long
Pipefitter	Vital Requested	Long
Vendor	Vital Requested	Long



### **ATTACHMENT 3**

Corporate and Nuclear Group Headquarters

Fitness-for-Duty Performance Data

January 1995 through June 1995

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

Peco Energy Company		June 30, 1995	
Company		6 Months Ending	
Corporate and Nuclear Group Headquarters			
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		2523				1648	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		5	0			3	0
For Cause	Post accident	2	0			0	0
	Observed behavior	0	0			0	0
Random		85	0			21	0
Follow-up		26	1			0	0
Other		3	0			0	0
Total		121	1			24	0



**Summary of Data Analysis and Management Actions  
Corporate and Nuclear Group Headquarters  
January - June 1995**

I. Initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug sniffing canine teams as well as investigations and interviews used to confirm information about illicit activities at Corporate and Nuclear Group Headquarters during the period.

- a. March 6, 1995 - General team sweep of the 965 Building, 1st Floor, Emergency Preparedness and Support Facilities. Results: One activation. No drugs found or forensic samples taken.

II. Management Actions

During the period, one PECO Energy employee tested positive on a follow-up test conducted at the Nuclear Group Headquarters. The employee was previously denied unescorted access based on prior positive tests. The employee was discharged.

III. Events Reported Under 10 CFR 26.73

There were no events reported during the period.

IV. Audits/Inspections

During the period, the NRC Region I conducted a reactive FFD inspection (Inspection Report Nos. 50-352/95-08 and 50-353/95-08). The inspection was primarily conducted at Limerick Generating Station (LGS), but examined aspects of the program across the Nuclear Group. A summary of the inspection findings is reported under Attachment 2, "Summary of Data Analysis and Management Action, Limerick Generating Station."

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS.

VI. Additional Information

Actions Taken Based Upon Unconfirmed On-site Screening

Specimens collected at the Corporate and Nuclear Group Headquarters are forwarded directly to the HHS-certified laboratory for testing. On-site screening is not conducted.

Reduced Marijuana Cut-off Level

There were no confirmed positive test for marijuana during the period.