



Northeast
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(860) 665-5000

February 28, 1997

Docket Nos. 50-213

50-245

50-336

50-423

B16208

Re: 10CFR26.71(d)

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

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Semiannual Fitness-for-Duty Performance Data
for July 1996 through December 1996

The provisions of 10CFR26.71(d) require licensees to collect and compile fitness-for-duty program performance data on a standard form and submit the data to the Commission within 60 days of the end of each 6-month reporting period (January through June and July through December). Accordingly, Attachments 1 through 6 contain fitness-for-duty program performance data for July 1996 through December 1996.

The regulations allow flexibility in how to submit the data, for example, corporate and other support staff locations may be separately consolidated, but require that the following data be included: random testing rate; drugs tested for and cutoff levels, including results of tests using lower cutoff levels and tests for other drugs; work force populations tested; numbers of tests and results by population and type of test (i.e., pre-access, random, for cause, etc.); substances identified; summary of management actions; and a list of events reported. Attachment 1 to this letter contains an explanation of the performance data form, a summary of the performance data, a summary of management actions, and other significant fitness-for-duty events. Attachments 2, 3, and 4 are separate compilations of data collected at Millstone Station, the Haddam Neck Plant, and Northeast Utilities' corporate office, respectively. Attachment 5 is a compilation of the aforementioned sites into one data sheet. We believe that it is useful to submit separate and total data sheets to the NRC Staff to aid in the data collection and analysis process.

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Also included with this submittal, as Attachment 6, is data collected by companies who conduct pre-access drug and alcohol testing for individuals who require unescorted access to the Haddam Neck Plant and Millstone Station. These companies, Westinghouse Electric Corporation and B&W Nuclear Technologies, have fitness-for-duty programs that have been audited and accepted by Northeast Utilities.

If you have any questions regarding this submittal, please contact Mr. Michael D. Ehredt at (860) 440-2142.

Very truly yours,
NORTHEAST UTILITIES SERVICE COMPANY



F. C. Rothen
Vice President

Attachments

cc: W. D. Travers, Dr., Director, Special Projects Office
H. J. Miller, Region I Administrator
P. F. McKee, Deputy Director of Licensing, Special Projects Office
W. D. Lanning, Director, Millstone Oversight Team
S. Dembek, NRC Project Manager, Millstone Unit No. 1
D. G. McDonald, Jr., NRC Project Manager, Millstone Unit No. 2
J. W. Andersen, NRC Project Manager, Millstone Unit No. 3
M. B. Fairtile, NRC Project Manager, Haddam Neck Plant
T. A. Easlick, Senior Resident Inspector, Millstone Unit No. 1
D. Beaulieu, Acting Senior Resident Inspector, Millstone Unit No. 2
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3
W. J. Raymond, Senior Resident Inspector, Haddam Neck Plant

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Attachment 1

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Performance Data Form Explanation
Summary of Performance Data/Management Actions
Other Significant Fitness-for-Duty Events

February 1997

**Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3**

**Performance Data Form Explanation
Summary of Performance Data/Management Actions
Other Significant Fitness-for-Duty Events**

Performance Data Form Explanation

- Cutoffs

Northeast Utilities' cutoff levels differ from NRC standard cutoff levels in the marijuana category only. Northeast Utilities uses a 50 ng/ml screening cutoff level, which is more conservative than the NRC standard.

- Substances

Northeast Utilities testing program includes only the NIDA 5 substances.

- Contractor Personnel

Northeast Utilities does not maintain records for separate categories of contractors. Consequently, all contractor data is recorded under the short-term contractor personnel category.

- Average Number of Unescorted Access Vs. Random Testing Results

The average number of corporate support personnel with unescorted access for either or both sites (see Attachment 4) includes employees from a variety of support locations; some at the corporate office, others at, or near, the two plant sites.

The data reported in the random test results category reflect the number of tests actually performed at each of Northeast Utilities' collection locations.

Although random selection of the corporate support personnel is performed in conjunction with the corporate office pool, specimen collection is actually done at the collection site nearest the individual's work location or current assignment--frequently at one of the stations. As a result, the number tested in the random category for the corporate office appears less than anticipated, while the number tested in the same category for Millstone Station and the Haddam Neck Plant is

higher than expected. However, the aggregate data for total program performance (Attachment 5) demonstrates that the number of random tests performed is on target and has met the required 50 percent testing rate.

- Confirmed Positive Tests for Specific Substances

This section contains the number of confirmed positive tests, recorded by substance, during the reporting period. Please note that there may be no direct correlation between the sum of these numbers and the number of positives entered on the front of the form; positive tests for multiple substances per individual are recorded as separate items in this table.

- NRC and Northeast Utilities Cutoff Levels

Since Northeast Utilities uses a cutoff level for marijuana which is more restrictive than the NRC, the "positive" column for that substance only is split; the left side indicates confirmed positives based on NRC cutoff levels, and the right side indicates the confirmed positives based on Northeast Utilities' more restrictive cutoff level.

- Other

This category is used to record "supplemental" tests performed during the report period. Supplemental tests are recollections of specimens which, for technical reasons, could not be processed by the NIDA laboratory. Examples of reasons for not processing include specimen leakage and insufficient specimen.

Summary of Performance Data

- 2987 tests performed.
- 1373 tests were random.
 - Average population = 5285
 - Annual 50 percent random testing rate achieved.
- Percent verified confirmed positive rates.
 - Pre-access = 2.06 percent (74.4 percent of verified confirmed positive tests were in this category).

- Random = 0.22 percent.
- Overall = 1.31 percent.
- There were 39 verified confirmed positive tests from 38 individuals, as one individual failed to provide a specimen.

Breakdown:

-	Marijuana	22	(56 percent)
-	Cocaine	5	(13 percent)
-	Alcohol	11	(28 percent)
-	Amphetamine	0	(0 percent)
-	Administrative	1	(3 percent)

There were no verified confirmed positive tests for any other substance.

- NRC vs. Northeast Utilities' Cutoff Levels (Marijuana)
 - A total of twenty-two individuals tested verified confirmed positive for marijuana. All of the samples screened at a level of 100 ng/ml or greater.

Management Actions

Thirty-three contractor personnel tested verified confirmed positive for drugs or alcohol. Twenty-six of these individuals tested verified confirmed positive in the prebadging situation. All twenty-six were denied unescorted access and will not be considered for unescorted access for a period of one year. Another seven contractor personnel, with unescorted access, tested verified confirmed positive and unescorted access privileges were revoked. These individuals are similarly not eligible for consideration for unescorted access for one year.

No outside applicant for employment with Northeast Utilities tested verified confirmed positive in a preemployment test.

Four Northeast Utilities' employees tested verified confirmed positive for the first time. Consistent with company policy, the following actions were taken:

- Unescorted access was revoked for a minimum of 14 days.
- The employees were referred to the Employee Assistance Program.

- The individuals were placed on paid medical leave for a minimum of 14 days (paid status contingent upon cooperation with the medical program and having sufficient sick time accrued).

Two Northeast Utilities' employees tested verified confirmed positive for the first time during a previous reporting period. Consistent with company policy, the following actions were taken for the first positive tests:

- Unescorted access was revoked for a minimum of 14 days.
- The employees were referred to the Employee Assistance Program
- The individuals were placed on paid medical leave for a minimum of 14 days (paid status contingent upon cooperation with the medical program and having sufficient sick time accrued).

These employees subsequently tested verified confirmed positive for a second time, one in a for-cause situation and one in a return-to-work test. These employees have been terminated from employment with Northeast Utilities.

Significant Fitness-for-Duty Events

There was one Significant Fitness-for-Duty Event during this reporting period.

The Significant event concerned a positive drug test on a reactor operator. The details of this incident were reported to the Commission in the letter of November 1, 1996.¹

A total of 365 blind proficiency specimens were processed for this 6-month period. There was one false negative and no false positives. The false negative test result was investigated by the Senior MRO, and the result of that investigation is on file at the corporate headquarters.

¹ T. C. Feigenbaum letter to U. S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Licensed Operator Fitness-For-Duty (FFD), Response to Request for Additional Information," dated November 1, 1996.

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Semiannual Fitness-for-Duty
Performance Data

February 1997

Attachment 1

Fitness for Duty Program Performance Data for Personnel Subject to 10CFR26

(Sheet 1 of 2)

Northeast Nuclear Energy Company	December 31, 1996
Company	6 Months Ending
Millstone	
Location	
Gordon R. Hallberg	(860) 665-3384
Contact Name	Area code and Phone #
<div style="display: flex; justify-content: space-between;"> <div> <p>Cutoffs: Screen/Confirmation (ng/ml)</p> <p>Marijuana: 50/15 Amphetamines: 1000/500</p> <p>Cocaine: 300/150 Phencyclidines: 25/25</p> <p>Opiates: 300/300 Alcohol (%BAC): 0.040</p> </div> <div> <p><input type="checkbox"/> Appendix A to 10CFR26</p> <p>_____ : /</p> <p>_____ : /</p> <p>_____ : /</p> </div> </div>	

TESTING RESULTS	Licensee Employee		Contractor Personnel	
Average Number with Unescorted Access	1725		2201	
CATEGORIES	# Tested	# Positive	# Tested	# Positive
Pre-Acess	3	1	1091	23
Pre-Employment	24	0	0	0
For Cause	4	3	8	2
Random	464	0	585	2
Follow-Up	41	1	17	0
Infrequent Visitor	0	0	72	0
Other	1	0	0	0
TOTAL	537	5	1773	27

Attachment 1 (cont'd)

Fitness for Duty Program Performance Data for Personnel Subject to 10CFR26

(Sheet 2 of 2)

BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES						
Categories	Licensee Employees		Contractor Personnel		Sub Total	
	NRC	NU Limits	NRC Limits	NU Limits	NRC	NU
Marijuana	1	1	18	18	19	19
Cocaine	0		4		4	
Opiates	0		0		0	
Amphetamines	0		0		0	
Phencyclidine	0		0		0	
Alcohol	4		4		8	
Refusal to Test	0		1		1	
Subtotal	5		27		TOTAL 32	

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Attachment 3

Haddam Neck Plant

Semiannual Fitness-for-Duty
Performance Data

February 1997

Attachment 1

Fitness for Duty Program Performance Data for Personnel Subject to 10CFR26

(Sheet 1 of 2)

CONNECTICUT YANKEE ATOMIC POWER COMPANY
Company

December 31, 1996
6 Months Ending

Haddam Neck
Location

Gordon R. Hallberg
Contact Name

(860) 665-3384
Area code and Phone #

Cutoffs: Screen/Confirmation (ng/ml)

☐ Appendix A to 10CFR26

Marijuana: 50/15 Amphetamines: 1000/500

_____ * _____ : /

Cocaine: 300/150 Phencyclidines: 25/25

_____ * _____ : /

Opiates: 300/300 Alcohol (%BAC): 0.040

_____ * _____ : /

TESTING RESULTS	Licensee Employee		Contractor Personnel	
Average Number with Unescorted Access	334		502	
CATEGORIES	# Tested	# Positive	# Tested	# Positive
Pre-Acess	8	0	268	4
Pre-Employment	1	0	0	0
For Cause	1	0	5	2
Random	115	1	125	0
Follow-Up	14	0	2	0
Infrequent Visitor	0	0	13	0
Other	0	0		0
TOTAL	139	1	413	6

Attachment 1 (cont'd)

Fitness for Duty Program Performance Data for Personnel Subject to 10CFR26

(Sheet 2 of 2)

BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES						
Categories	Licensee Employees		Contractor Personnel		Sub Total	
	NRC	NU Limits	NRC Limits	NU Limits	NRC	NU
Marijuana	0	0	3	3	3	3
Cocaine	0		1		1	
Opiates	0		0		0	
Amphetamines	0		0		0	
Phencyclidine	0		0		0	
Alcohol	1		2		3	
Refusal to Test	0		0		0	
Subtotal	1		6		TOTAL 7	

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Attachment 4

Northeast Utilities' Corporate Office

Semiannual Fitness-for-Duty
Performance Data

February 1997

Attachment 1

Fitness for Duty Program Performance Data for Personnel Subject to 10CFR26

(Sheet 1 of 2)

NORTHEAST UTILITIES SERVICE COMPANY

Company

December 31, 1996

6 Months Ending

Berlin

Location

Gordon R. Hallberg

Contact Name

(860) 665-3384

Area code and Phone #

Cutoffs: Screen/Confirmation (ng/ml)

☐ Appendix A to 10CFR26

Marijuana: 50/15 Amphetamines: 1000/500

_____ * _____: /

Cocaine: 300/150 Phencyclidines: 25/25

_____ * _____: /

Opiates: 300/300 Alcohol (%BAC): 0.040

_____ * _____: /

TESTING RESULTS	Licensee Employee		Contractor Personnel	
Average Number with Unescorted Access	523		0	
CATEGORIES	# Tested	# Positive	# Tested	# Positive
Pre-Acess	30	0	5	0
Pre-Employment	4	0	0	0
For Cause	0	0	0	0
Random	82	0	2	0
Follow-Up	2	0	0	0
Infrequent Visitor	0	0	0	0
Other	0	0	0	0
TOTAL	118	0	7	0

Attachment 1 (cont'd)

Fitness for Duty Program Performance Data for Personnel Subject to 10CFR26

(Sheet 2 and 2)

BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES						
Categories	Licensee Employees		Contractor Personnel		Sub Total	
	NRC	NU Limits	NRC Limits	NU Limits	NRC	NU
Marijuana	0	0	0	0	0	0
Cocaine	0		0		0	
Opiates	0		0		0	
Amphetamines	0		0		0	
Phencyclidine	0		0		0	
Alcohol	0		0		0	
Refusal to Test	0		0		0	
Subtotal	0		0		TOTAL 0	

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Attachment 5

Northeast Utilities

Semiannual Fitness-for-Duty
Performance Data Compilation

February 1997

Attachment 1

Fitness for Duty Program Performance Data for Personnel Subject to 10CFR26

(Sheet 1 and 2)

NORTHEAST UTILITIES (CORPORATE)

Company

December 31, 1996

6 Months Ending

Berlin

Location

Gordon R. Hallberg

Contact Name

(860) 665-3384

Area code and Phone #

Cutoffs: Screen/Confirmation (ng/ml)

☐ Appendix A to 10CFR26

Marijuana: 50/15 Amphetamines: 1000/500

_____ * _____: /

Cocaine: 300/150 Phencyclidines: 25/25

_____ * _____: /

Opiates: 300/300 Alcohol (%BAC): 0.040

_____ * _____: /

TESTING RESULTS	Licensee Employee		Contractor Personnel	
Average Number with Unescorted Access	2582		2703	
CATEGORIES	# Tested	# Positive	# Tested	# Positive
Pre-Acess	41	1	1364	27
Pre-Employment	29	0	0	0
For Cause	5	3	13	4
Random	661	1	712	2
Follow-Up	57	1	19	0
Infrequent Visitor	0	0	85	0
Other	1	0	0	0
TOTAL	794	6	2193	33

Attachment 1 (cont'd)

Fitness for Duty Program Performance Data for Personnel Subject to 10CFR26

(Sheet 2 and 2)

BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES						
Categories	Licensee Employees		Contractor Personnel		Sub Total	
	NRC	NU Limits	NRC Limits	NU Limits	NRC	NU
Marijuana	1	1	21	21	22	22
Cocaine	0		5		5	
Opiates	0		0		0	
Amphetamines	0		0		0	
Phencyclidine	0		0		0	
Alcohol	5		6		11	
Refusal to Test	0		1		1	
Subtotal	6		33		TOTAL 39	

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Attachment 6

Westinghouse Electric Corporation

and

B&W Nuclear Technologies

Semiannual Fitness-for-Duty
Performance Data Compilation

February 1997

Westinghouse Fitness for Duty Program

Performance Data

Personnel Subject to 10CFR26



Customer: Northeast Utilities (Millstone #2 and #3 - Haddam Neck Plants)

1	Westinghouse Electric Corporation	2	December 31, 1996			
	Company		6 months ending			
3	P.O. Box 158, Madison, PA 15663					
	Location					
4	Peter J. Defilippi/Betty L. Engle	5	(412) 722-5721/5719			
	Contact Name		Phone (include area code)			
6						
	Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR26					
	Marijuana	20/15	Amphetamines	300/300	Barbiturates	300/300
	Cocaine	300/150	Phencyclidine	25/25	Benzodiazepines	300/300
	Opiates	300/300	Alcohol (% BAC)	0.04%	Methadone	300/300
					Methaqualone	300/300

Testing Results		Westinghouse Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access 7		2200		—		—	
Categories 8		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		17	0	0	0	0	0
For Cause	Post accident	0	0	0	0	0	0
	Observed behavior	0	0	0	0	0	0
Random		0	0	0	0	0	0
Follow-up		0	0	0	0	0	0
Other		0	0	0	0	0	0
Total		17	0	0	0	0	0

Breakdown of Confirmed Positive Tests for Specific Substances

9	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4
Employees	0	0	0	0	0	0	0	0	0	0	0
Long-Term Contractors	-	-	-	-	-	-	-	-	-	-	-
Short-Term Contractors	-	-	-	-	-	-	-	-	-	-	-
TOTAL	0	0	0	0	0	0	0	0	0	0	0

LEGEND

- 1 = Barbiturates
- 2 = Benzodiazepines
- 3 = Methadone
- 4 = Methamphetamine

NEUDAP96.WP

**Fitness for Duty Program
Performance Data
Personnel Subject to 10CFR26**

1 <u>NORTHEAST UTILITIES/CONN YANKEE</u> <div style="text-align: center;">Company</div>	2 <u>Jul 1 thru Dec 31, 1996</u> <div style="text-align: center;">6 Months Ending</div>															
3 <u>362 Indian Hollow Road E. Hampton, CT 06424-3099</u> <div style="text-align: center;">Location</div>																
4 <u>Amy L. Hanse, Manager, FTI Access Control</u> <div style="text-align: center;">Contact Name</div>	5 <u>(804) 832-4010</u> <div style="text-align: center;">Phone (include area code)</div>															
6 Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR26 <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">Marijuana</td> <td style="width: 15%;">50 / 15</td> <td style="width: 25%;">Amphetamines</td> <td style="width: 15%;">1000 / 500</td> <td style="width: 20%; text-align: right;">/</td> </tr> <tr> <td>Cocaine</td> <td>300 / 150</td> <td>Phencyclidine</td> <td>25 / 25</td> <td style="text-align: right;">/</td> </tr> <tr> <td>Opiates</td> <td>300 / 300</td> <td>Alcohol (% BAC)</td> <td>.04</td> <td style="text-align: right;">/</td> </tr> </table>		Marijuana	50 / 15	Amphetamines	1000 / 500	/	Cocaine	300 / 150	Phencyclidine	25 / 25	/	Opiates	300 / 300	Alcohol (% BAC)	.04	/
Marijuana	50 / 15	Amphetamines	1000 / 500	/												
Cocaine	300 / 150	Phencyclidine	25 / 25	/												
Opiates	300 / 300	Alcohol (% BAC)	.04	/												

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access							
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		N/A	N/A	N/A	N/A	56	0
	Post Accident	N/A	N/A	N/A	N/A	N/A	N/A
	Observed Behavior	N/A	N/A	N/A	N/A	N/A	N/A
Random		N/A	N/A	N/A	N/A	N/A	N/A
Follow-Up		N/A	N/A	N/A	N/A	N/A	N/A
Other		N/A	N/A	N/A	N/A	N/A	N/A
Total		0	0	0	0	56	0

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	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
Short-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A						A
Total	0	0	0	0	0	0	N/A						

**Fitness for Duty Program
Performance Data
Personnel Subject to 10CFR26**

1 <u>NORTHEAST UTILITIES/MILLSTONE</u> <div style="text-align: center;">Company</div>	2 <u>JUL 1 thru DEC 31, 1996</u> <div style="text-align: center;">6 Months Ending</div>																		
3 <u>ROPE FERRY ROAD P. O. BOX 128 WATERFORD, CT 06385</u> <div style="text-align: center;">Location</div>																			
4 <u>A. L. Hanse, Manager, FTI Access Control</u> <div style="text-align: center;">Contact Name</div>	5 <u>(804) 832-4010</u> <div style="text-align: center;">Phone (include area code)</div>																		
6 Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR26 <table style="width: 100%; border: none;"> <tr> <td style="width: 20%;">Marijuana</td> <td style="width: 15%;">50 / 15</td> <td style="width: 20%;">Amphetarnines</td> <td style="width: 15%;">1000 / 500</td> <td style="width: 15%; text-align: center;">_____</td> <td style="width: 15%; text-align: center;">/</td> </tr> <tr> <td>Cocaine</td> <td>300 / 150</td> <td>Phencyclidine</td> <td>25 / 25</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">/</td> </tr> <tr> <td>Opiates</td> <td>300 / 300</td> <td>Alcohol (% BAC)</td> <td>.04</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">/</td> </tr> </table>		Marijuana	50 / 15	Amphetarnines	1000 / 500	_____	/	Cocaine	300 / 150	Phencyclidine	25 / 25	_____	/	Opiates	300 / 300	Alcohol (% BAC)	.04	_____	/
Marijuana	50 / 15	Amphetarnines	1000 / 500	_____	/														
Cocaine	300 / 150	Phencyclidine	25 / 25	_____	/														
Opiates	300 / 300	Alcohol (% BAC)	.04	_____	/														

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access							
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		N/A	N/A	N/A	N/A	10	0
	Post Accident	N/A	N/A	N/A	N/A	N/A	N/A
	Observed Behavior	N/A	N/A	N/A	N/A	N/A	N/A
Random		N/A	N/A	N/A	N/A	N/A	N/A
Follow-Up		N/A	N/A	N/A	N/A	N/A	N/A
Other PRE-EMP		N/A	N/A	N/A	N/A	N/A	N/A
Total		N/A	N/A	N/A	N/A	10	0

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	5	
Licensee Employees	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A						
Short-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A						A
Total	0	0	0	0	0	0	N/A						