



Ron Benham
Director Nuclear Regulatory Affairs

February 25, 2021
RA 21-0018

U.S. Nuclear Regulatory Commission
Attn: NRC Document Control Desk
Washington, DC 20555-0001

Subject: Docket No. 50-482: Electronic Submittal of Annual Fitness for Duty
Program Performance Report and Annual Fatigue Report for 2020

To Whom It May Concern:

Please be advised that Wolf Creek Nuclear Operating Corporation (WCNOC) submitted the Annual Fitness for Duty (FFD) program performance data and Annual Fatigue Report for 2020 to the Nuclear Regulatory Commission (NRC) FFD Program Performance Data Reporting System through the U.S. NRC Electronic Information Exchange on February 25, 2021. This submittal meets the requirements in 10 CFR 26.203, 10 CFR 26.717 and 10 CFR 26.719. In accordance with 10 CFR 26.11, copies of the reported information are also enclosed with this report for the appropriate regional office and Senior Resident Inspector.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4204.

Sincerely,

A handwritten signature in black ink that reads "Ron Benham". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ron Benham

RDB/rlt

ENCLOSURE: Copies of 2020 FFD and Fatigue Reports

CC: N. O'Keefe (NRC), w/e
S. A. Morris (NRC), w/e
Senior Resident Inspector (NRC), w/e
S.S. Lee (NRC), w/e

Enclosure to RA 21-0018

Copies of 2020 FFD and Fatigue Reports
(This enclosure contains 7 pages in addition to this cover page)

APPROVED BY OMB: CLEARANCE NO. 3150-0146

EXPIRES: 04/30/2021

Estimated burden per response to comply with this collection request is 108 hours. This form is a voluntary means of reporting the information required under 10 CFR 26.417(b)(2) and 26.717. The information is required by NRC to obtain on an annual basis site specific fitness-for-duty (FFD) program performance data on drug and alcohol programs from licensees and other entities. Send comments regarding burden estimate to the FOIA, Information Services Branch (T6-A10M), U.S. Nuclear Regulatory Commission, Washington DC 20555-0001, or by e-mail to InfoCollects.Resource@NRC.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-1020, (3150-0146), Office of Management and Budget, Washington DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

- 1) All fields required unless marked 'optional'
2) Use of Adobe Reader 8 or later is required
3) Mouse over fields for additional information

☐ Submission
☐ Update

Facility

Wolf Creek [50-482]

Period of Report

2020

Tests Conducted in the Calendar Year

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access	74	166	4
Random	419	129	0
For Cause	1	1	0
Post-Event	1	1	0
Follow-up	31	4	0
Total (Calculated)	526	301	4

FFD Program Random Testing Population and Rate

WARNING: The percentage(%) entered does not equal the $\left[\frac{\text{Total number of RANDOM tests conducted ("Licensee Employees" + "Contractors/Vendors")}}{\text{Total size of the random testing pool}} \right] \times 100$.

Average number of licensee employees

826

Average number of contractors/vendors

213

Total size of the random testing pool throughout the period (Calculated)

1,039

Annual random testing percentage achieved for the testing pool

52

Laboratory Testing

Does your program use a Licensee Testing Facility? (Yes / No)

No

HHS-Certified Laboratory (Primary)

Clinical Reference Laboratory

HHS-Certified Laboratory (Backup)

None

Identify your Blind Performance Test Sample supplier(s)

EISohly Laboratory

Substances Tested

Did your program only test for NRC-required substances AND at the NRC-specified minimum cutoff levels? (Yes / No)

Yes

Does your program conduct LOD testing permitted in 26.163(a)(2)? (Yes / No)

Yes

Special Analyses Testing Results

Total Number of "Dilute" Specimen Test Results (Optional)

Total Number of "Dilute" Specimens (Special Analyses Testing Conducted)

0

Substance	Use NRC Cutoffs?	Initial Cutoff	Confirmatory Cutoff	Limit of Detection (LOD) Testing?	Comment (Optional)
Alcohol	Yes			Not Applicable	
Cocaine	Yes			Yes	
Marijuana	Yes			Yes	
Amphetamines	Yes			Yes	
Opiates	Yes			Yes	
PCP	Yes			Yes	

Substances Tested - continued

Summary of Management Actions - 26.717(b)(8)

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Other(s)

Please elaborate:

Licensee identified NCV - medical review officer (MRO) expired reassessment and reinvestigation dates

Topic 1 Description

Access Authorization / FFD failed to successfully implement a psychological reassessment and reinvestigation process for Fitness for Duty Program Personnel. (MRO and MRO staff members)

Condition Report #143387 - implemented electronic process within SSIS application to provide 90 day, 60 day, and 30 day notifications for Fitness for Duty Program Personnel.

☐ Add an additional Topic

Person(s) Responsible for Information Provided

Person 1 (required):

Pamela	Black	Access Specialist	Pam.Black@evergy.com
First Name	Last Name	Position Title	Company Email Address

Person 2 (optional):

Sonya	Jones	Supervisor Access Screening	Sonya.Jones@evergy.com
First Name	Last Name	Position Title	Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 10 CFR 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

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NRC FFD Program Performance Data Reporting System

NRC Form 892, Annual Fatigue Reporting Form

10 CFR Part 26, Subpart I - Managing Fatigue

(EIE General Submission Portal)

Facility
Wolf Creek [50-482]

Period of Report
2020

Note:
1) Use Adobe Reader 8 or later for this form to work properly.
2) Hold your mouse over a form field to view additional information.

APPROVED BY OMB: CLEARANCE NO. 3150-0146 **EXPIRES: 04/30/2021**

Estimated burden per response to comply with this collection request is 74 hours. This form is a voluntary means of reporting the information required under 10 CFR 26.203(e). The information will be used by NRC to evaluate fatigue program performance related to work hour controls and waivers. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collection Branch (T5-F53), U.S. Nuclear Regulatory Commission, Washington DC 20555-0001, or by e-mail to InfoCollection.Resource@NRC.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEDB-1020, (3150-0146), Office of Management and Budget, Washington DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

☐ Submission Update - check this box only if this is an update to a previous submission.

Did your facility issue any waivers in the reporting period? (Yes / No)

No

Summary of Waiver Issuance - 26.203(e)(1)(i-ii)

Work Hour Controls		Number of Waivers Issued																	
		Operating or on-site directing of the operations of systems, as described in 26.4(a)(1)			Performing health physics or chemistry duties, as described in 26.4(a)(2)		Performing duties of a fire brigade member, as described in 26.4(a)(3) *		Performing maintenance or on-site direction of maintenance, as described in 26.4(a)(4)		Performing security duties, as described in 26.4(a)(5)		Operating Total	Outage Total (days 1-60)	Outage Total (after day 60)	Combined Total			
		Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (days 1-60)	Outage (after day 60)	Operating	Outage (days 1-60)	Outage (after day 60)	(Calculated)	(Calculated)	(Calculated)	(Calculated)		
Daily Work Hours 26.205(d)(1)	Exceeded 16 work hrs in any 24 hr period																		
	Exceeded 26 work hrs in any 48 hr period																		
	Exceeded 72 work hrs in any 7 day period																		
Rest Breaks 26.205(d)(2)	Less than 10 hr break b/t successive work periods (or 8 hr break accommodating scheduled transition b/t shifts)																		
	Less than 34 hr break in any 9 day period																		
Minimum Days Off Per Shift Cycle 26.205(d)(3)	Average of less than 1 day off per week for 8-hour shifts																		
	Average of less than 2 days off per week for 10-hour shifts																		
	Average of less than 2.5 days off per week for 12-hour shifts																		
	Average of less than 2 days off per week for 12-hour maintenance shifts																		
Minimum Days Off for Outage Activities (during first 60 days of outage) 26.205(d)(4) and 26.205(d)(5)	Average of less than 3 days off per week for 12-hour security shifts																		
	Less than 3 days off per successive 15-day period 26.205(d)(4)																		
	Less than 1 day off per 7-day period for maintenance personnel 26.205(d)(4)																		
Alternate to Minimum Days Off 26.205(d)(7)	Less than 4 days off per successive 15-day period for security personnel 26.205(d)(5)																		
	54 hour maximum average																		
Total																			

* NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade column. Do not double count these individuals.

Distribution of Waivers for Individuals in Each Category - 26.203(e)(1)(iii)

Number of Employees Issued Waivers					
[Note: Even if no waivers were issued for a given column, please enter a value (e.g., 0) in at least one of the cells in the column]					
Number of Waivers	Operating or on-site directing of the operations of systems, as described in 26.4(a)(1)	Performing health physics or chemistry duties as described in 26.4(a)(2)	Performing duties of a fire brigade member as described in 26.4(a)(3) *	Performing maintenance or on-site directing of maintenance as described in 26.4(a)(4)	Performing security duties as described in 26.4(a)(5)
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11 - 20					
More than 20					
Total Employees Issued Waivers (Calculated)					
Most Waivers Provided to a Single Individual					

* NOTE: For individuals performing fire brigade duties and other duties, please count them only under the fire brigade column. Do not double count these individuals.

Person(s) Responsible for Information Provided

Person 1 (required):
Pamela Black Access Specialist pam.black@evergy.com
First Name Last Name Position Title Company Email Address

Person 2 (optional):
Sonya Jones Access Supervisor Sonya.Jones@evergy.com
First Name Last Name Position Title Company Email Address

Final Step (Required) - NRC will consider this form authentic in accordance with 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

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Summary of Corrective Action - 26.203(e)(2) (as applicable)

Analysis of Waiver Assessment Data: (Limit 10,000 characters)
Zero waivers reported in 2020.

Analysis of Fatigue Assessment Data: (Limit 10,000 characters)
10 CFR 26.205(c), Reviews - Licensees shall evaluate the effectiveness of their control of work hours of individuals who are subject to this section. Licensees shall conduct the reviews once per calendar years.
6 fatigue assessments were done in 2020. 1 for self-declaration, 2 for post event, 2 for waivers and 1 for cause.
Fatigue assessments are being completed by the worker and by a qualified and trained Fatigue Assessor accurately and thoroughly.
No concerns noted from this program review. QH-2021-2132

Conclusions: (Limit 10,000 characters)
No waivers issued for 2020 and no concerns noted from completed fatigue assessments. QH-2021-2132

Summary and Status of Corrective Actions: (Limit 10,000 characters)
The Fatigue Management Annual Program Review assessment did not document any performance gaps or additional issues.
Reference QH-2021-2132.

General Comments (optional) (Limit 10,000 characters)

- 1) All fields required except those marked 'optional'
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☐ Submission Update ☐ Delete Submission

Unique Reference ID (Licensee Supplied)

A1

Facility

Wolf Creek [50-482]

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Outage Worker (optional)?

No

Labor Category - 26.717(b)(3)

Non-Licensed Operator

Date of Collection
(mm/dd/yyyy)

09/14/2020

Is this a 24-hour reportable event under 26.719(b)?

No

Was this collection refused? - 26.717(b)(7) & 26.75

No

Test Results - 26.717(b)(4)

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Alcohol Only

Substance - 26.717(b)(2) & (b)(6)

Alcohol

Alcohol Specimen Tested

Breath

What 26.103 BAC level was exceeded?

0.03 and in work status at least 1 hr

Subversion Attempt - Did this collection involve a subversion attempt? - 26.717(b)(7) and 26.75(b)

No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied

(NRC Minimum or Licensee Administrated)

NRC Minimum

Specific Sanction Applied

14- Day Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Pamela

Black

Access Specialist

pam.black@evergy.com

First Name

Last Name

Position Title

Company Email Address

Person 2 (optional):

Sonya

Jones

Access Supervisor

sonya.jones@evergy.com

First Name

Last Name

Position Title

Company Email Address

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Unique Reference ID (Licensee Supplied)

A2

Facility

Wolf Creek [50-482]

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Outage Worker (optional)?

No

Labor Category - 26.717(b)(3)

Non-Licensed Operator

Date of Collection
(mm/dd/yyyy)

06/23/2020

Is this a 24-hour reportable event under 26.719(b)?

No

Was this collection refused? - 26.717(b)(7) & 26.75

No

Test Results - 26.717(b)(4)

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Alcohol Only

Substance - 26.717(b)(2) & (b)(6)

Alcohol

Alcohol Specimen Tested

Breath

What 26.103 BAC level was exceeded?

0.04 or greater

Subversion Attempt - Did this collection involve a subversion attempt? - 26.717(b)(7) and 26.75(b)

No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied

(NRC Minimum or Licensee Administrated)

NRC Minimum

Specific Sanction Applied

14- Day Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Pamela

Black

Access Specialist

pam.black@evergy.com

First Name

Last Name

Position Title

Company Email Address

Person 2 (optional):

Sonya

Jones

Access Supervisor

sonya.jones@evergy.com

First Name

Last Name

Position Title

Company Email Address

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Unique Reference ID (Licensee Supplied)

D1

Facility

Wolf Creek [50-482]

Date of Collection
(mm/dd/yyyy)

12/18/2019

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Please elaborate (optional)

Final result date 01/09/2020. As result was not received until 2020 - captured on the 2020 Annual Report.

Employment Type - 26.717(b)(3)

Licensee Employee

Outage Worker (optional)?

No

Labor Category - 26.717(b)(3)

Other

Please elaborate on the Labor Category selected

Information Services

Is this a 24-hour reportable event under 26.719(b)? ☐ No

Was this collection refused? - 26.717(b)(7) & 26.75 ☐ No

Test Results - 26.717(b)(4)

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Drug Only

Drug Specimen Tested

Urine

Test Validity

Valid

Was this collection observed? - 26.717(b)(7) & 26.75 ☐ No

How many substances were confirmed positive for this individual? 1

Substance - 26.717(b)(2) & (b)(6)	Use NRC Cutoffs?	Initial Cutoff	Confirmatory Cutoff	Limit of Detection
Marijuana	<input type="checkbox"/> Yes			

Subversion Attempt - Did this collection involve a subversion attempt? - 26.717(b)(7) and 26.75(b) ☐ No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied

(NRC Minimum or Licensee Administrated)

NRC Minimum

Specific Sanction Applied

14- Day Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Pamela Black Access Specialist pam.black@evergy.com

Person 2 (optional):

Sonya Jones Access Supervisor sonya.jones@evergy.com

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Unique Reference ID (Licensee Supplied)

D2

Facility

Wolf Creek [50-482]

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Please elaborate (optional)

Employment Type - 26.717(b)(3)

Contractor/Vendor

Outage Worker (optional)?

No

Labor Category - 26.717(b)(3)

Maintenance (general facility)

Date of Collection
(mm/dd/yyyy)

07/27/2020

Is this a 24-hour reportable event under 26.719(b)? ☐ No

Was this collection refused? - 26.717(b)(7) & 26.75 ☐ No

Test Results - 26.717(b)(4)

Test Type(s) for Result(s) Reported - 26.717(b)(2)

Drug Only

Drug Specimen Tested

Urine

Test Validity

Valid

Was this collection observed? - 26.717(b)(7) & 26.75 ☐ No

How many substances were confirmed positive for this individual? 1

Substance - 26.717(b)(2) & (b)(6)	Use NRC Cutoffs?	Initial Cutoff	Confirmatory Cutoff	Limit of Detection
Marijuana	<input type="checkbox"/> Yes			

Subversion Attempt - Did this collection involve a subversion attempt? - 26.717(b)(7) and 26.75(b) ☐ No

Management Actions - 26.717(b)(8) & 26.75

Reason for the Action

First drug or alcohol positive

Sanction Applied

(NRC Minimum or Licensee Administrated)

NRC Minimum

Specific Sanction Applied

14- Day Denial

Person(s) Responsible for Information Provided

Person 1 (required):

Pamela Black Access Specialist pam.black@evergy.com

Person 2 (optional):

Sonya Jones Access Supervisor sonya.jones@evergy.com

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