



August 25, 2000

C0800-13  
10 CFR 26.71(d)

Docket Nos: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2  
10 CFR PART 26, FITNESS FOR DUTY PROGRAM

In accordance with 10 CFR 26.71(d), Fitness for Duty Program, this submittal represents the Donald C. Cook Nuclear Plant Fitness for Duty Program performance data for the six-month period from January 1, 2000, to June 30, 2000. Attached are performance data sheets that include statistics on the various categories of testing, substances for which testing is conducted, and a summary of management actions.

Should you have any questions, please contact Mr. Wayne J. Kropp, Director of Regulatory Affairs, at (616) 697-5056.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. P. Powers', with a horizontal line extending to the right.

R. P. Powers  
Vice President

/dmb

Attachment

c: J. E. Dyer  
MDEQ – DW & RPD, w/o attachment  
NRC Resident Inspector  
R. Whale, w/o attachment

A021

### TESTING CATEGORIES AND SUBSTANCES

The following is offered as an explanation for information outlined in the performance data report regarding the various categories of testing and the substances for which testing is conducted:

Long-term contractor personnel – plant protection contractors

Short-term contractor personnel – all contractor personnel other than plant protection

Marijuana confirmed positives noted on page two of the performance data report are reported as:

- eight short-term contractor persons at the 100 NG cut-off level;
- five positives for short-term contractor (50 NG);
- one long-term contractor person (50 NG);
- one licensee employee at the Donald C. Cook Nuclear Plant's (CNP) more conservative cut-off level (50 NG); and
- eight short-term contractor personnel were positive for Marijuana at the CNP's suspect level (20NG).

Of the 41 total positive tests reported, twenty four were the result of Pre-access applicant testing (twenty-two positive results and two deemed positive based on an adulterated specimen), six For-Cause tests, two random testing, eight follow-up tests (seven positive results and one deemed positive based on an adulterated specimen), and one blood draw.

A total of 42 tests were reported as positive on the "Breakdown of confirmed Positive Tests for Specific Substances." The differences in test results between Page 1 and 2 of the Performance Data Summary is due to one specimen being reported positive for two separate substances.

**FITNESS FOR DUTY PROGRAM  
PERFORMANCE DATA  
PERSONNEL SUBJECT TO 10CFR26**

<u>Indiana Michigan Power Co.</u> Company	<u>6/30/00</u> 6 Month Ending
<u>Cook Nuclear Plant, Bridgman, Michigan</u> Location	
<u>K. E. Burkett</u> Contact Name	<u>(616) 466-3335</u> Phone
Cutoffs: Screen/Confirmation (ng/ml)	<input checked="" type="checkbox"/> Appendix A to 10CFR26
Marijuana 50/15      Amphetamine 1000/500	<u>N/A</u> N/A
Cocaine 300/300      Phencyclidine 25/25	<u>N/A</u> N/A
Opiates 300/300      Alcohol (%BAC) 0.04%	<u>N/A</u> N/A

Testing Results	Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
	# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access	1389		166		2064	
Pre-Access	70	1	26	1	1399	22
For-Cause Post Accident	4	0	2	0	7	0
For-Cause Observed Behavior	10	0	3	0	26	6
Random	349	0	35	0	459	2
Follow-Up	24	0	4	0	153	8
Other	14	0	0	0	2	1
Total	471	1	70	1	2046	39

**BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

	Marijuana		Cocaine	Opiates	Amphetamines	Phencyclidene	Alcohol	Refusal To Test	Marijuana Suspect Specimen	Adulterated Specimen
	50	100								
Licensee Employee	1	0	0	0	0	0	0	0	0	0
Long-Term Contractors	1	0	0	0	0	0	0	0	0	0
Short-Term Contractors	5	8	3	0	1	0	9	3	8	3
Total	7	8	3	0	1	0	9	3	8	3

Total Confirmed Positive Tests For All Specific Substances, Refusals to Test and Adulterated Specimens: 42

**MANAGEMENT ACTIONS:**

Meetings are conducted with laboratory, collection site, Medical Review Officer(s), Employee Assistance Program staff, and psychological assessment personnel to assure consistent and effective implementation of the fitness for duty (FFD) program.

The high number of pre-access positive results is attributed to the CNP's "suspect specimen" process, and the large number of contractor personnel in-processing due to the extended outage. Specimens collected and deemed "suspect specimens" are tested at a lower cut-off level. Observed behavior in the collection facility, specimen temperature out of range, and collection site specific gravity test results out of range are some of the bases for identifying a "suspect specimen" and considering whether a particular individual may have altered or substituted a urine specimen. A second specimen is obtained under direct observation, as applicable, and both specimens are tested at the "suspect specimen" cut-off level. Actions and sanctions taken as a result of positive test results are performed in accordance with FFD regulatory requirements.

The Suspect Specimen Procedure was revised to address actions to be taken in the event it is determined a worker attempted to, and/or did, alter or substitute the urine sample. This action is considered to be a violation to the CNP FFD Program and unescorted access to CNP will be permanently denied.

The FFD Program was revised to address actions to be taken relative to legal hemp products, as follows:

"Although ingestion of hemp oil/hemp oil food products is not prohibited by company policy, THC test results above the cutoff limits will be reported by the Medical Review Officer as confirmed positive for THC, and appropriate sanctions will be imposed as provided by regulation and the D. C. Cook Nuclear Plant FFD Program."

The canine program continues to be a constant reminder to plant personnel of CNP's commitment to maintain a drug free work environment. The canine unit provides anti-drug presentations to local schools and other community organizations in addition to regular tours of CNP property. The canine unit is also made available to local law enforcement agencies, upon request.

**APPEALS:**

Six appeals were received during this reporting period. The appeal process at CNP provides notice and an opportunity to provide additional information for an impartial management review. The appeals for these individuals were denied based on failure to

provide sufficient mitigating circumstances or evidence showing why the denial determination was incorrect.

EVENTS:

There were no events identified as reportable in accordance with 10 CFR 26.73 during this reporting period.

TEMPORARY SUSPENSIONS:

No temporary suspensions or administrative actions were taken against individuals based on on-site presumptive positive drug results.

Indiana Michigan Power Company continues to perform annual random testing at a rate equal to or exceeding fifty percent of the total population.