



PECO NUCLEAR

A Unit of PECO Energy

10CFR26.71(d)

PECO Energy Company
200 Exelon Way
Kennett Square, PA 19348

August 28, 2000

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
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NPF-85

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

Subject: Peach Bottom Atomic Power Station, Units 2 & 3
Limerick Generating Station, Units 1 & 2
Fitness-for-Duty Program Performance Data for the Period -
January 2000 through June 2000

Dear Sir/Madam:

As required by 10CFR26.71(d), this letter submits the performance data for PECO Energy's Fitness-for-Duty (FFD) Program for the period January 2000 through June 2000. The data for our Peach Bottom Atomic Power Station (PBAPS), Units 2 & 3, and Limerick Generating Station (LGS), Units 1 & 2, sites are provided in Attachments 1 and 2. Data for our Corporate Office and Nuclear Group (PECO Nuclear) Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA, and Berwyn Transportation Center, Wayne, PA, respectively) are provided in Attachment 3.

The data is 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 includes 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.

A021

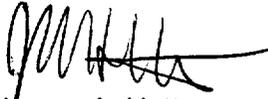
Attachments 1, 2, and 3 also include the following:

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

During this period, there were no significant FFD events reported.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



James A. Hutton
Director - Licensing

Attachments

cc: H. J. Miller, Administrator, Region I, USNRC (w/attachment)
A. L. Burritt, USNRC Senior Resident Inspector, LGS (w/attachment)
A. C. McMurtry, USNRC Senior Resident Inspector, PBAPS (w/attachment)

ATTACHMENT 1

Peach Bottom Atomic Power Station

Units 2 and 3

Fitness-for-Duty Performance Data

January 2000 through June 2000

**FITNESS FOR DUTY
PERFORMANCE DATA
PERSONNEL SUBJECT TO 10 CFR 26**

PECO Energy Company
Company

June 30, 2000
Six Months Ending

Peach Bottom Atomic Power Station
Location

David M. Sarley
Contact Name

215-841-5703
Phone (include area code)

Cutoffs: Screen/Confirmation (ng/ml) Appendix A to 10 CFR 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		2251				1085	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		46	1			109	0
FOR CAUSE	Post accident	1	0			0	0
	Observed behavior	0	0			2	0
Random		203	0			130	0
Follow-up		23	0			36	0
Other		9	0			1	0
Total		282	1			278	0

**Breakdown of Confirmed Positive Tests for Specific Substances: Peach Bottom Atomic Power Station
June 30, 2000**

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal To Test	1	2	3	4	5	
Licensee Employees	1	0	0	0	0	0	0						
Long -Term Contractors	0	0	0	0	0	0	0						
Short -Term Contractors	0	0	0	0	0	0	0						A
Total	1	0	0	0	0	0	0						1

Attachment 1
Summary of Data Analysis and Management Actions
Peach Bottom Atomic Power Station
January – June 2000

I. Initiatives Taken

The following summarizes the results of sweeps conducted during the period 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).

- a. March 6, 2000 – Return-to-work Security Recheck of individual following FFD policy violation (positive random test). The recheck and interview did not produce any information to prevent the employee's return to work. Unescorted access restored.
- b. March 21, 2000 – For cause interview of contractor following self-disclosed criminal history on an Unescorted Access Authorization Affidavit regarding a DUI conviction. Access granted, but subsequently denied based upon receipt of additional criminal history information.
- c. April 4, 2000 – For cause interview of an employee based upon a self-disclosed alcohol related arrest. Individual required to provide arrest documentation, submit to demand psychological evaluation, and agree to accelerated program of unannounced drug and alcohol testing. Unescorted access continued.
- d. April 12, 2000 – For cause interview of an employee based upon a self-disclosed drug related arrest. The employee provided documentation regarding dismissal of charges. Unescorted access continued.
- e. May 24, 2000 – Random drug dog sweep conducted of the Seal Team Muster Area. No drugs or forensic samples taken.
- f. June 1, 2000 – For cause interview of a contractor recently involved in off-site accident where alcohol allegedly was involved. Contractor submitted to demand psychological evaluation and agreed to accelerated program of unannounced drug and alcohol testing. Unescorted access continued.
- g. June 12, 2000 – For cause interview of a contractor following recent DUI arrest. Contractor submitted to demand psychological evaluation and agreed to accelerated program of unannounced drug and alcohol testing. Unescorted access continued.

II. Management Actions

During the period, one (1) applicant for employment tested positive on a pre-access test at PBAPS. Employment and unescorted access was denied.

III. Events Reported Under 10 CFR 26.73

No significant FFD events were reported by PBAPS during the period.

IV. Audits/Inspections

During the period Nuclear Quality Assurance personnel conducted an audit of the following aspects of the FFD program: Chemical Testing; Sample Collection; Collection Site readiness; Breath Alcohol testing; On-site initial screening of specimens; Presumptive positive specimens; and, Semi-Annual Performance Data Reporting. Satisfactory implementation of the requirements of 10 CFR part 26 was found with one exception. That exception involved the improper maintenance of a FFD procedure manual at the Limerick Generating Station collection site. The auditor found that a few outdated procedures had not removed from the manual. Immediate corrective actions were taken. The auditor determined that the potential for use of the outdated procedures was low. Requirements for maintenance of procedure manuals were reviewed with collection site personnel to ensure understanding.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. Actual random testing during the period equaled an annualized rate of 50.3% for employees and 51.6% for contractors. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and Limerick Generating Station (LGS).

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

PECO Energy has elected to temporarily suspend access for individuals as permitted by 10 CFR 26.24(d).

During the previous 6-month reporting period (i.e., July - December 1999), 100% of the specimens which were presumptive 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 81.25%. Therefore, in accordance with 10 CFR 26.24(d), actions could only be taken during this reporting period on specimens which were presumptive positive for cocaine.

During the current reporting period, ten (10) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and LGS. Nine (9) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. (The other specimen was reported as adulterated by the HHS-certified laboratory.) The Medical Review Officer verified the nine (9) specimens as positive. The tenth specimen was verified as adulterated by the Medical Review Officer. No action was taken based upon an unconfirmed presumptive positive test for marijuana.

During the current reporting period, five (5) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS and LGS. The five (5) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the five (5) specimens as positive. Of the five (5) specimens reported as presumptive positive as a result of on-site screening, four (4) were for pre-access testing. Unescorted access was temporarily suspended in the case of one (1) individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received.

NOTE: The number of specimens reported as positive is different from the number of individuals reported as positive due to the collection of multiple specimens in certain situations or as a result of specimens in which more than one drug was identified.

Reduced Marijuana Cut-off Level

During the period, one (1) individual provided a specimen which was confirmed positive 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 2000 through June 2000

**FITNESS FOR DUTY
PERFORMANCE DATA
PERSONNEL SUBJECT TO 10 CFR 26**

PECO Energy Company
Company

June 30, 2000
Six Months Ending

Limerick Generating Station
Location

David M. Sarley
Contact Name

215-841-5703
Phone (include area code)

Cutoffs: Screen/Confirmation (ng/ml) Appendix A to 10 CFR 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		2251				1085	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		147	2			707	10
FOR CAUSE	Post accident	6	0			8	0
	Observed behavior	1	0			3	1
Random		267	0			137	2
Follow-up		33	1			51	0
Other		9	0			3	0
Total		463	3			909	13

Breakdown of Confirmed Positive Tests for Specific Substances: Limerick Generating Station - June 30, 2000

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal To Test	1	2	3	4	5	
Licensee Employees	1	1	0	0	0	1	0						
Long -Term Contractors	0	0	0	0	0	0	0						
Short -Term Contractors	8	4	0	0	1	1	0						A
Total	9 ¹	5 ¹	0	0	1	2	1 ²						18 ¹

¹Includes two short-term contractors positive for both marijuana and cocaine

²Nitrate adulteration

Attachment 2
Summary of Data Analysis and Management Actions
Limerick Generating Station
January – June 2000

I. Initiatives Taken

The following summarizes the results of sweeps conducted during the period 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).

- a. March 1, 2000 – Random drug dog sweep of the G. M. Leitch Building, basement floor. No drugs or forensic samples taken.
- b. March 10, 2000 – Random drug dog sweep of the Kemper Building, first floor. No drugs or forensic samples taken.
- c. March 10, 2000 – For cause interview of contractor based upon derogatory information developed during pre-access background investigation. Contractor revealed during the interview recent use of controlled substances and current mental health treatment. **Contractor denied unescorted access.**
- d. March 15, 2000 – Random drug dog sweep of the Personnel Processing Center. No drugs or forensic samples taken.
- e. March 15, 2000 – For cause interview of contractor seeking unescorted access who disclosed a recent drug related charge. During the interview, the contractor revealed a subsequent conviction for distribution of illegal drugs with no indication of rehabilitation. **Contractor denied unescorted access.**
- f. March 15, 2000 – For cause interview of contractor seeking unescorted access who disclosed recent treatment for mental illness or emotional stability. During the interview, the contractor revealed a lengthy history of drug abuse with current mental health treatment. **Contractor denied unescorted access.**
- g. March 15, 2000 – For cause interview of contractor seeking unescorted access who disclosed a recent drug charge. During the interview, the contractor revealed pending criminal charges for drug sales and recent illegal drug use. **Contractor denied unescorted access.**
- h. March 15, 2000 – For cause interview of contractor seeking unescorted access who disclosed a questionable employment termination and recent drug treatment. During the interview, the contractor revealed a lengthy history of drug abuse with recent inpatient treatment. Contractor submitted to demand psychological interview which concluded the contractor was not suitable for unescorted access. **Contractor denied unescorted access.**
- i. March 21, 2000 – For cause interview of contractor seeking unescorted access who revealed a recent questionable employment termination. During the interview, the contractor revealed recent mental health hospitalizations. Contractor submitted to demand psychological interview which concluded the contractor was not suitable for unescorted access. **Contractor denied unescorted access.**
- j. March 22, 2000 – For cause interview of contractor seeking unescorted access who revealed recent alcohol related arrests. Contractor submitted to demand psychological interview which

concluded the contractor was not suitable for unescorted access. **Contractor denied unescorted access.**

- k. March 29, 2000 – For cause interview of contractor seeking unescorted access who disclosed a recent arrest. Interview revealed the arrest was alcohol related and contractor is currently participating in psychological counseling. Contractor submitted to demand psychological interview which concluded the contractor was not suitable for unescorted access. **Contractor denied unescorted access.**
- l. March 30, 2000 – For cause interview of contractor who submitted a confirmed adulterated urine specimen for pre-access FFD testing. Contractor refused to complete the interview and left abruptly. **Contractor denied unescorted access.**
- m. March 30, 2000 – For cause interview of contractor seeking owner controlled access who submitted a suspected surrogate urine sample for pre-access FFD testing. (Suspicion was based upon low temperature.) Contractor maintained the sample was valid but refused to submit to witnessed sample collection. Suspected surrogate specimen tested positive. The contractor informed Medical Review Officer he had substituted his daughters urine. **Contractor denied unescorted access.**
- n. March 31, 2000 – For cause interview of contractor who tested positive for alcohol on a for cause FFD test. Contractor admitted to consuming five (5) beers prior to reporting to work this date. Subsequent consensual search of contractor's personnel vehicle revealed no contraband. **Contractor denied unescorted access.**
- o. April 3, 2000 – For cause interview of contractor who tested positive for alcohol on a pre-employment FFD test. Contractor admitted to consuming a significant quantity of alcohol the prior evening. Subsequent consensual search of contractor's company vehicle revealed no contraband. **Contractor denied site access.**
- p. April 11, 2000 – Random drug dog sweep of Cooling Tower contractor work trailers. **No drugs or forensic samples taken.**
- q. April 13, 2000 – Random drug dog sweep of the LGS work management centers and an area of the general parking lot. **No drugs or forensic samples taken.**
- r. April 17, 2000 – An investigation was initiated as a result of an employee reported DUI arrest. The investigation and subsequent medical screening resulted in referral to the Employee Assistance Program. Unescorted access was suspended pending EAP evaluation. **Unescorted access was subsequently reinstated.**
- s. April 18, 2000 – Random drug dog sweep of the LGS Management Building. **No drugs or forensic samples taken.**
- t. April 19, 2000 – An investigation was initiated as a result of an employee reported DUI arrest. The investigation and subsequent medical screening resulted in referral to the Employee Assistance Program. Unescorted access was suspended pending EAP evaluation. **Unescorted access was subsequently reinstated.**
- u. April 25, 2000 – An investigation was initiated as a result of an employee reported DUI arrest. The investigation and subsequent medical screening resulted in referral to the Employee Assistance Program. Unescorted access was suspended pending EAP evaluation. **Unescorted access was subsequently reinstated.**

- v. June 13, 2000 – For cause interview of applicant for employment seeking unescorted access who disclosed a recent arrest. Interview revealed recent drug use. **Applicant denied employment and unescorted access.**

II. Management Actions

During the period, there were thirteen (13) (i.e., ten (10) pre-access, one (1) for cause, and two (2) random) positive or adulterated tests on LGS contractor employees. The contractors were denied unescorted access in accordance with PECO Energy policy.

During the period, there were three (3) (i.e., two (2) pre-access, one (1) follow-up) positive tests on PECO LGS employees. Unescorted access was denied and the employees were referred to the Employee Assistance Program. Unescorted access was subsequently reinstated for two (2) of the employees.

III. Events Reported Under 10 CFR 26.73

During the period there were no significant FFD events reported by telephone under 10 CFR 26.73 by LGS.

IV. Audits/Inspections

During the period Nuclear Quality Assurance personnel conducted an audit of the following aspects of the FFD program: Chemical Testing; Sample Collection; Collection Site readiness; Breath Alcohol testing; On-site initial screening of specimens; Presumptive positive specimens; and, Semi-Annual Performance Data Reporting. Satisfactory implementation of the requirements of 10 CFR part 26 was found with one exception. That exception involved the improper maintenance of a FFD procedure manual at the Limerick Generating Station collection site. The auditor found that a few outdated procedures had not removed from the manual. Immediate corrective actions were taken. The auditor determined that the potential for use of the outdated procedures was low. Requirements for maintenance of procedure manuals were reviewed with collection site personnel to ensure understanding.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. Actual random testing during the period equaled an annualized rate of 50.3% for employees and 51.6% for contractors. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and Limerick Generating Station (LGS).

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

PECO Energy has elected to temporarily suspend access for individuals as permitted by 10 CFR 26.24(d).

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During the current reporting period, ten (10) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and LGS. Nine (9) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. (The other specimen was reported as adulterated by the HHS-certified laboratory.) The Medical Review Officer verified the nine (9) specimens as positive. The tenth specimen was verified as adulterated by the Medical Review Officer. No action was taken based upon an unconfirmed presumptive positive test for marijuana.

During the current reporting period, five (5) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS and LGS. The five (5) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the five (5) specimens as positive. Of the five (5) specimens reported as presumptive positive as a result of on-site screening, four (4) were for pre-access testing. Unescorted access was temporarily suspended in the case of one (1) individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received.

NOTE: The number of specimens reported as positive is different from the number of individuals reported as positive due to the collection of multiple specimens in certain situations or as a result of specimens in which more than one drug was identified.

Reduced Marijuana Cut-off Level

During the period, nine (9) specimens which were confirmed positive for marijuana at LGS. It is estimated that none of the specimens would have tested positive using the 100 ng/ml immunoassay cut-off level.

ATTACHMENT 3

Corporate and PECO Nuclear Headquarters

Fitness-for-Duty Performance Data

January 2000 through June 2000

**FITNESS FOR DUTY
PERFORMANCE DATA
PERSONNEL SUBJECT TO 10 CFR 26**

PECO Energy Company
Company

June 30, 2000
Six Months Ending

Corporate and Nuclear Group Headquarters
Location

David M. Sarley
Contact Name

215-841-5703
Phone (include area code)

Cutoffs: Screen/Confirmation (ng/ml) Appendix A to 10 CFR 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		2251				1085	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		19	0			0	0
FOR CAUSE	Post accident	1	0			0	0
	Observed behavior	0	0			0	0
Random		96	0			13	0
Follow-up		7	0			0	0
Other		4	0			0	0
Total		127	0			13	0

Breakdown of Confirmed Positive Tests for Specific Substances: Corporate and Nuclear Group Headquarters

June 30, 2000

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal To Test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	0	0						
Long -Term Contractors	0	0	0	0	0	0	0						
Short -Term Contractors	0	0	0	0	0	0	0						A
Total	0	0	0	0	0	0	0						0

Attachment 3
Summary of Data Analysis and Management Actions
Corporate and PECO Nuclear Headquarters
January – June 2000

I. Initiatives Taken

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

No initiatives were conducted at the Corporate or Nuclear Headquarters during the period.

II. Management Actions

There were no positive tests on personnel tested from the Corporate or Nuclear Headquarters during the period.

III. Events Reported Under 10 CFR 26.73

There were no events reported during the period.

IV. Audits/Inspections

During the period Nuclear Quality Assurance personnel conducted an audit of the following aspects of the FFD program: Chemical Testing; Sample Collection; Collection Site readiness; Breath Alcohol testing; On-site initial screening of specimens; Presumptive positive specimens; and, Semi-Annual Performance Data Reporting. Satisfactory implementation of the requirements of 10 CFR part 26 was found with one exception. That exception involved the improper maintenance of a FFD procedure manual at the Limerick Generating Station collection site. The auditor found that a few outdated procedures had not removed from the manual. Immediate corrective actions were taken. The auditor determined that the potential for use of the outdated procedures was low. Requirements for maintenance of procedure manuals were reviewed with collection site personnel to ensure understanding.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. Actual random testing during the period equaled an annualized rate of 50.3% for employees and 51.6% for contractors. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and Limerick Generating Station (LGS).

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

Specimens collected at the Corporate and PECO 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 positive tests during the period.