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10CFR26.71(d)

August 24, 2001

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

Peach Bottom Atomic Power Station, Units 2 & 3  
Facility Operating License Nos. DPR-44 and 56  
Docket Nos. 50-277 and 50-278

Limerick Generating Station, Units 1 & 2  
Facility Operating License Nos. NPF-39 and 85  
Docket Nos. 50-352 and 50-353

Subject: Fitness-for-Duty Program Performance Data for the Period -  
January 2001 through June 2001

Dear Sir/Madam:

As required by 10CFR26.71(d), this letter submits the performance data for Exelon's Fitness-for-Duty (FFD) Program for the period January 2001 through June 2001. 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 Mid-Atlantic Regional Operating Group Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA, and Kennett Square, 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.

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Fitness for Duty Performance Data

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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 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,



M. P. Gallagher  
Director - Licensing  
Mid-Atlantic Regional Operating Group

Attachments

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

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

Exelon Nuclear

Company

June 30, 2001

Six Months Ending

Peach Bottom Atomic Power Station

Location

Dolly Adams

Contact Name

610-765-5014

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		2149				813	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		20	0			78	1
FOR CAUSE	Post accident	7	0			2	0
	Observed behavior	4	1			0	0
Random		225	0			101	0
Follow-up		29	0			26	0
Other		4	0			0	0
<b>Total</b>		<b>289</b>	<b>1</b>			<b>207</b>	<b>1</b>

Breakdown of Confirmed Positive Tests for Specific Substances:

Peach Bottom Atomic Power Station - June 30, 2001

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal To Test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	1	0						
Long -Term Contractors	0	0	0	0	0	0	0						
Short -Term Contractors	0	0	0	0	0	1	0						<b>A</b>
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>						<b>2</b>

# **Attachment 1**

Peach Bottom Atomic Power Station

Units 2 and 3

Fitness-For-Duty Performance Data

January 2001 through June 2001

Attachment 1  
Summary of Data Analysis and Management Actions  
Peach Bottom Atomic Power Station  
January – June 2001

I. Initiatives Taken

Responsibility for day-to-day FFD Program operations was transferred from Occupational Health & Safety to Nuclear Security.

II. Management Actions

During the period, one (1) contractor employee (pre-access) and one (1) Exelon employee tested positive at PBAPS. In accordance with company policy, the contractor employee was denied unescorted access. The Exelon employee unescorted access was suspended and the employee referred for treatment/rehabilitation. The employee was subsequently reinstated.

III. Events Reported Under 10 CFR 26.73

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

IV. Audits/Inspections

There were no audits or inspections conducted during the period.

On June 6, 2001, during a review of the 31-day Unescorted Access Validation Process, security personnel identified that several newly appointed supervisors had failed to complete Supervisory FFD training within 3 months after initial supervisory assignment as required by 10 CFR Part 26.22(c). Despite the fact that this requirement is captured in FFD Procedures and General Employee Training, the individuals identified indicated that they were unaware of the requirement. All individuals identified as being deficient have now completed the required Supervisory Training. As a result of this deficiency, the FFD Training program is being redesigned to provide all required levels of FFD training in a single program that will be completed by all individuals performing functions covered by 10 CFR Part 26.

V. Random Testing Rate

Exelon Nuclear MAROG 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. Actual random testing during the period equaled an annualized rate of 50.7% for employees and 51.2% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

The company has decided 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 2000, 100 percent of the specimens identified as 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 specimens identified as presumptive positive for marijuana was 75%. Therefore, according to the rule, action could only be taken during the current reporting period on specimens identified as presumptive positive for cocaine.

During the current reporting period, i.e., January – June 2001, six (6) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS and/or LGS. The six (6) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the six (6) specimens as positive. Of the six (6) specimens reported as presumptive positive as a result of on-site screening, one (1) was for follow-up testing and five (5) 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.

During the current reporting period, i.e., January – June 2001, seven specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and/or LGS. Six (6) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. (One (1) specimen reported as presumptive positive for marijuana was reported as adulterated by the HHS-certified laboratory.) The MRO verified the six (6) specimens as positive. The seventh specimen was verified as adulterated by the Medical Review Officer. No action was taken based upon an unconfirmed presumptive positive test for marijuana.

#### Reduced Marijuana Cut-off Level

During the period, there were no confirmed positive tests for marijuana at PBAPS.

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

Exelon Nuclear

Company

June 30, 2001

Six Months Ending

Limerick Generating Station

Location

Dolly Adams

Contact Name

610-765-5014

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		2149				813	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		63	0			627	13
FOR CAUSE	Post accident	7	0			14	0
	Observed behavior	4	0			0	0
Random		241	0			103	0
Follow-up		40	0			29	2
Other		5	0			0	0
<b>Total</b>		<b>360</b>	<b>0</b>			<b>773</b>	<b>15</b>

Breakdown of Confirmed Positive Tests for Specific Substances:

Limerick Generating Station - June 30, 2001

	Marijuana	Cocaine	Opiates	Amphetamines	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	7	6	0	0	0	1	2*						<b>A</b>
Total	7	6	0	0	0	1	2						16**

\* Includes an adulterated specimen.

\*\* One individual tested positive for more than one substance.

## **Attachment 2**

Limerick Generating Station

Units 1 and 2

Fitness-For-Duty Performance Data

January 2001 through June 2001

Attachment 2  
Summary of Data Analysis and Management Actions  
Limerick Generating Station  
January – June 2001

I. Initiatives Taken

Responsibility for day-to-day FFD Program operations was transferred from Occupational Health & Safety to Nuclear Security.

II. Management Actions

During the period, fifteen (15) contractor employees (i.e., thirteen (13) pre-access, and two (2) follow-up) tested positive at LGS. In accordance with company policy, the fifteen (15) contractor employees were denied unescorted access.

III. Events Reported Under 10 CFR 26.73

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

IV. Audits/Inspections

There were no audits or inspections conducted during the period.

On June 6, 2001, during a review of the 31-day Unescorted Access Validation Process, security personnel identified that several newly appointed supervisors had failed to complete Supervisory FFD training within 3 months after initial supervisory assignment as required by 10 CFR Part 26.22(c). Despite the fact that this requirement is captured in FFD Procedures and General Employee Training, the individuals identified indicated that they were unaware of the requirement. All individuals identified as being deficient have now completed the required Supervisory Training. As a result of this deficiency, the FFD Training program is being redesigned to provide all required levels of FFD training in a single program that will be completed by all individuals performing functions covered by 10 CFR Part 26.

V. Random Testing Rate

Exelon Nuclear MAROG 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. Actual random testing during the period equaled an annualized rate of 50.7% for employees and 51.2% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

The company has decided 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 2000, 100 percent of the specimens identified as 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 specimens identified as presumptive positive for marijuana was 75%. Therefore, according to the rule, action could only be taken during the current reporting period on specimens identified as presumptive positive for cocaine.

During the current reporting period, i.e., January – June 2001, six (6) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS and/or LGS. The six (6) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the six (6) specimens as positive. Of the six (6) specimens reported as presumptive positive as a result of on-site screening, one (1) was for follow-up testing and five (5) 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.

During the current reporting period, i.e., January – June 2001, seven specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and/or LGS. Six (6) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. (One (1) specimen reported as presumptive positive for marijuana was reported as adulterated by the HHS-certified laboratory.) The MRO verified the six (6) specimens as positive. The seventh specimen was verified as adulterated by the Medical Review Officer. No action was taken based upon an unconfirmed presumptive positive test for marijuana.

#### Reduced Marijuana Cut-off Level

During the period, there were seven (7) confirmed positive tests for marijuana at LGS. It is estimated that only one (1) of the specimens would have tested positive using the 100 ng/ml immunoassay cut-off level.

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

Exelon Nuclear

Company

June 30, 2001

Six Months Ending

Corporate and Mid-Atlantic Regional Operating Group Headquarters

Location

Dolly Adams

Contact Name

610-765-5014

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	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access		2149				813	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		11	0			13	0
FOR CAUSE	Post accident	1	0			0	0
	Observed behavior	0	0			0	0
Random		79	1			4	1
Follow-up		7	0			1	0
Other		4	0			0	0
<b>Total</b>		<b>102</b>	<b>1</b>			<b>18</b>	<b>1</b>

Breakdown of Confirmed Positive Tests for Specific Substances:

Corporate and Mid-Atlantic Regional Operating Group Headquarters - June 30, 2001

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal To Test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	0	1						
Long -Term Contractors	0	0	0	0	0	0	0						
Short -Term Contractors	1	0	0	0	0	0	0						<b>A</b>
<b>Total</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>						<b>2</b>

## **Attachment 3**

Mid-Atlantic Regional Operating Group

And Corporate

Fitness-For-Duty Performance Data

January 2001 through June 2001

Attachment 3  
Summary of Data Analysis and Management Actions  
Corporate and Mid-Atlantic ROG Headquarters  
January – June 2001

I. Initiatives Taken

Responsibility for day-to-day FFD Program operations was transferred from Occupational Health & Safety to Nuclear Security.

II. Management Actions

During the period, one (1) Exelon nuclear employee refused a random test and one (1) contractor employee tested positive for marijuana. In accordance with company policy, the Exelon employee was terminated, and the contractor employee was denied unescorted access..

III. Events Reported Under 10 CFR 26.73

There were no significant FFD events reported by the Corporate and Mid-Atlantic ROG Headquarters during the period.

IV. Audits/Inspections

There were no audits or inspections conducted during the period.

On June 6, 2001, during a review of the 31-day Unescorted Access Validation Process, security personnel identified that several newly appointed supervisors had failed to complete Supervisory FFD training within 3 months after initial supervisory assignment as required by 10 CFR Part 26.22(c). Despite the fact that this requirement is captured in FFD Procedures and General Employee Training, the individuals identified indicated that they were unaware of the requirement. All individuals identified as being deficient have now completed the required Supervisory Training. As a result of this deficiency, the FFD Training program is being redesigned to provide all required levels of FFD training in a single program that will be completed by all individuals performing functions covered by 10 CFR Part 26.

V. Random Testing Rate

Exelon Nuclear MAROG 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. Actual random testing during the period equaled an annualized rate of 50.7% for employees and 51.2% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

Specimens collected at the Corporate and Mid-Atlantic ROG Headquarters are forwarded directly to the HHS-certified laboratory for testing. On-site screening is not performed.

Reduced Marijuana Cut-off Level

During the period, there was one (1) confirmed positive test for marijuana at Corporate and Mid-Atlantic ROG Headquarters. It is estimated that this specimen would not have been positive using the 100 ng/ml immunoassay cut-off level.