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10CFR26.71(d)

August 28, 2002  
2130-02-20242  
5928-02-20166

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

Three Mile Island, Units 1 & 2  
Facility Operating License Nos. DPR-50 and 73  
Docket Nos. 50-289 and 50-320

Oyster Creek Generating Station  
Facility Operating License No. DPR-16  
Docket No. 50-219

Subject: Fitness-for-Duty Program Performance Data for the Period -  
January 2002 through June 2002

Reference: Letter from AmerGen to NRC "Fitness for Duty (FFD) Semi-Annual Report,  
January – June 2002", dated August 12, 2002

As required by 10CFR26.71(d), this letter submits Fitness-for-Duty (FFD) Program performance data for the period January 2002 through June 2002. The data for the Peach Bottom Atomic Power Station (PBAPS), Units 2 & 3, Limerick Generating Station (LGS), Units 1 & 2, Three Mile Island Generating Station (TMI), Units 1 & 2, and Oyster Creek Generating Station (OCGS) sites are provided in Attachments 1 through 4. Data for the Exelon 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 5.

Please note that the information provided in Attachment 3, for TMI, supersedes the information previously provided in the Reference letter.

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:

A021

- 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.

Attachments 1 through 5 also include the following:

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

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

Very truly yours,



M. P. Gallagher  
Director - Licensing & Regulatory Affairs  
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. McMurray, USNRC, Senior Resident Inspector, PBAPS (w/attachment)  
T. G. Colburn, USNRC, Senior Project Manager, TMI (w/attachment)  
P. S. Tam, USNRC, Senior Project Manager, OCGS (w/attachment)  
J. D. Orr, USNRC, Senior Resident Inspector, TMI w/attachment)  
R. J. Summers, USNRC, Senior Resident Inspector, OCGS (w/attachment)  
File No. 02066, OCGS (w/attachments)  
File No. 02071, TMI (w/attachments)

# **Attachment 1**

**Peach Bottom Atomic Power Station**

**Units 2 and 3**

**Fitness-For-Duty Performance Data**

**January 2002 through June 2002**

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

Exelon Nuclear

Company

June 30, 2002

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		1747				748	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		61	0			180	0
FOR CAUSE	Post accident	2	0			5	0
	Observed behavior	4	0			1	0
Random		198	0			107	0
Follow-up		14	2			10	0
Other		5	0			2	0
<b>Total</b>		<b>284</b>	<b>2</b>			<b>305</b>	<b>0</b>

Breakdown of Confirmed Positive Tests for Specific Substances:

Peach Bottom Atomic Power Station - June 30, 2002

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

Attachment 1  
Summary of Data Analysis and Management Actions  
Peach Bottom Atomic Power Station  
January – June 2002

I. Initiatives Taken

Nineteen (19) Exelon Fitness For Duty procedures are currently being revised in the Mid-Atlantic Regional Operating Group (MAROG) and Mid-West Regional Operating Group (MWROG) for incorporation into one common set of procedures.

II. Management Actions

During the period, two (2) Exelon employees tested positive at PBAPS. Both of the tests were follow-up. Unescorted access was temporarily suspended in the case of the Exelon employee who tested positive for marijuana, pending confirmation and Medical Review Officer (MRO) verification. Unescorted access was subsequently denied once the MRO verification was received. The employee was referred for treatment/rehabilitation. The employee who tested positive for alcohol (follow-up) was denied unescorted access.

III. Events Reported Under 10 CFR 26.73

There was one significant FFD event reported by PBAPS during the period. The individual was a non-licensed operator/supervisor who tested positive for marijuana.

IV. Audits/Inspections

During the period, an assessment to evaluate the Fitness For Duty program was conducted by Nuclear Oversight personnel. The assessment found that the Exelon FFD drug and alcohol testing activities were determined to be performed satisfactorily in accordance with 10 CFR Part 26.

There were no findings generated during the period.

There were two (2) Condition Reports (CRs) generated during the assessment period.

1. CR 97670 - Attachment 3 to SY-MA-102-203 was covered up at the counter where individuals report for drug and alcohol testing. Therefore, the individuals did not have a copy of the Drug & Alcohol Testing Information and Instructions to read prior to testing activities. DrugScan immediately uncovered the information sheet and placed it on the counter. DrugScan instructed everyone to read the Attachment 3 prior to signing the consent form.
2. CR 97676 - A procedure violation was identified with regards to processing of abnormal FFD specimens. SY-MA-102-220, section 4.5, states that if the specific gravity is less than 1.003, the collection person (CP) is required to ask the individual if he/she is taking diuretics or is a diabetic. This is to be documented in the remarks section of the chain of custody (COC) and the Permanent Record book. Individuals were documenting this information in the section for medications taken within the past 30 days. Alternatively, DrugScan does instruct individuals to record these requirements in the remarks section of the COC and the Permanent Record Log book.

V. Random Testing Rate

Exelon Nuclear MAROG Corporate Office, LGS and PBAPS maintain one testing "pool" for employees and a separate testing "pool" for 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 51.3% for contractors.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

The Peach Bottom and Limerick sites have 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 2001, 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 91.7%. Therefore, according to the rule, action could be taken during the current reporting period on specimens identified as presumptive positive for marijuana and cocaine

During the current reporting period, i.e., January – June 2002, four (4) specimens were reported as presumptive positive for cocaine as a result of preliminary on-site screening at LGS and/or PBAPS. Three tests were subsequently reported as positive by the HHS-certified laboratory. The Medical Review Officer (MRO) verified the three (3) specimens as positive. All three (3) positives were pre-access. Unescorted access was denied once the MRO verifications were received.

During the current reporting period, i.e., January – June 2002, nineteen (19) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and/or LGS. Sixteen (16) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The MRO verified the sixteen (16) specimens as positive. Unescorted access was temporarily suspended in the case of one (1) Exelon individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received. The Exelon employee's unescorted access was suspended and the employees were referred for treatment/rehabilitation. The other fifteen positives were for pre-access. Unescorted access was denied once the MRO verifications were received.

#### Reduced Marijuana Cut-off Level

During the period, there was one (1) confirmed positive test for marijuana at PBAPS. It is estimated that 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 2002 through June 2002



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

Exelon Nuclear

Company

June 30, 2002

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		1747				748	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		87	0			1049	21
FOR CAUSE	Post accident	5	0			7	0
	Observed behavior	6	1			7	0
Random		171	0			84	0
Follow-up		28	0			32	0
Other		19	0			0	0
<b>Total</b>		<b>316</b>	<b>1</b>			<b>1179</b>	<b>21</b>

Breakdown of Confirmed Positive Tests for Specific Substances:

Limerick Generating Station - June 30, 2002

	Marijuana	Cocaine	Opiates	Amphetamine	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	15	3	0	0	0	3	0						A
Total	15	3	0	0	0	4	0						22

Attachment 2  
Summary of Data Analysis and Management Actions  
Limerick Generating Station  
January – June 2002

I. Initiatives Taken

Nineteen (19) Exelon Fitness For Duty procedures are currently being revised in the Mid-Atlantic Regional Operating Group (MAROG) and Mid-West Regional Operating Group (MWROG) for incorporation into one common set of procedures.

II. Management Actions

During the period, twenty-one (21) pre-access contractor employees tested positive at LGS. In accordance with company policy, the twenty-one (21) contractor employees were denied unescorted access. One (1) Exelon employee tested positive (for-cause) and was 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

During the period, an assessment to evaluate the Fitness For Duty program was conducted by Nuclear Oversight personnel. The assessment found that the Exelon FFD drug and alcohol testing activities were determined to be performed satisfactorily in accordance with 10 CFR Part 26.

There were no findings generated during the period.

There were two (2) Condition Reports (CRs) generated during the assessment period

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V. Random Testing Rate

Exelon Nuclear MAROG Corporate Office, LGS and PBAPS maintain one testing "pool" for employees and a separate testing "pool" for 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 51.3% for contractors.

VI. Additional information

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During the current reporting period, i.e., January – June 2002, nineteen (19) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and/or LGS. Sixteen (16) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The MRO verified the sixteen (16) specimens as positive. Unescorted access was temporarily suspended in the case of one (1) Exelon individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received. The Exelon employee's unescorted access was suspended and the employees were referred for treatment/rehabilitation. The other fifteen positives were for pre-access. Unescorted access was denied once the MRO verifications were received.

#### Reduced Marijuana Cut-off Level

During the period, there were fifteen (15) confirmed positive tests 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**

Three Mile Island Generating Station

Units 1 and 2

Fitness-for-Duty Performance Data

January 2002 through June 2002

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

<u>AmerGen Energy Company, LLC</u>	<u>June 30, 2002</u>
<b>Company</b>	<b>6 Months Ending</b>
<u>Three Mile Island Nuclear Generating Station Units 1 &amp; 2, Middletown PA</u>	Operating License and Docket DPR-50/Docket 50-289 (TMI-1)
<b>Location</b>	Possession Only License and Docket DPR-73/Docket 50-320 (TMI-2)
<u>Mike Bruecks.</u>	<u>(717) 948 – 8208</u>
<b>Contact Name</b>	<b>Phone (Include Area Code)</b>

CUTOFFS: SCREEN/CONFIRMATION (ng/ml)    APPENDIX A TO 10CFR26

MARIJUANA	/	AMPHETAMINES	/	
COCAINE	/	PHENCYCLIDINE	/	
OPIATES	/	ALCOHOL (% BAC)	/	

TESTING RESULTS		LICENSEE EMPLOYEES		LONG-TERM CONTRACTOR PERSONNEL		SHORT-TERM CONTRACTOR PERSONNEL	
		# TESTED	# POSITIVE	# TESTED	# POSITIVE	# TESTED	# POSITIVE
<b>AVERAGE NUMBER WITH UNESCORTED ACCESS</b>		<b>801</b>		<b>N/A</b>		<b>142</b>	
<b>CATEGORIES</b>		<b># TESTED</b>	<b># POSITIVE</b>	<b># TESTED</b>	<b># POSITIVE</b>	<b># TESTED</b>	<b># POSITIVE</b>
<b>PRE-ACCESS</b>		<b>34</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>155</b>	<b>2</b>
<b>FOR CAUSE</b>	<b>POST ACCIDENT</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
	<b>OBSERVED BEHAVIOR</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>
<b>RANDOM</b>		<b>206</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>49</b>	<b>0</b>
<b>FOLLOW-UP</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>
<b>OTHER</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>TOTAL</b>		<b>255</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>208</b>	<b>3</b>

**PERFORMANCE DATA FOR PERSONNEL SUBJECT TO 10 CFR 26**  
**REPORT PERIOD: January 2002 – June 2002**  
**THREE MILE ISLAND - PAGE 2 of 3**

**BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**  
**(THREE MILE ISLAND)**

	MARIJUANA	COCAINE	OPIATES	AMPHE-TAMINES	PHENCY-CLIDINE	ALCOHOL	REFUSAL TO TEST	
LICENSEE EMPLOYEES	0	0	0	0	0	0	0	
LONG-TERM CONTRACTORS	0	0	0	0	0	0	0	
SHORT-TERM CONTRACTORS	0	1	0	0	1	1	0	
TOTAL	0	1	0	0	1	1	0	3

**PERFORMANCE DATA FOR PERSONNEL SUBJECT TO 10 CFR 26  
REPORT PERIOD: JANUARY 2002 – JUNE 2002  
THREE MILE ISLAND - ATTACHMENT - Page 3 of 3**

**TESTING RATE**

1. The annualized random testing rate for TMI Licensee Employees was 51.4%.
2. The annualized random testing rate for Three Mile Island Contractor Personnel was 69.0%.

**SUMMARY OF MANAGEMENT ACTIONS**

1. There were two (2) TMI Contractor employees who tested positive for drugs as a result of Pre-Access testing and one (1) TMI Contractor employee who tested positive for alcohol. The Contractor employees were denied unescorted access to the TMI protected area.

**LIST OF EVENTS REPORTED**

1. There were no reportable events during this period



## **Attachment 4**

Oyster Creek Generating Station

Fitness-for-Duty Performance Data

January 2002 through June 2002

**TESTING RATE**

1. The annualized random testing rate for Oyster Creek Licensee Employees was 69.94%.
2. The annualized random testing rate for Oyster Creek Contractor Personnel was 89.27%.

**SUMMARY OF MANAGEMENT ACTIONS**

1. There were no (0) Licensee Positive Pre-Access tests during the reporting period. There were no (0) Licensee Positive Random tests during the period.
2. There were three (3) Contractor Positive Pre -Access tests during the reporting period. All three (3) tested positive for Drugs. There was one (1) Contractor Positive For -Cause (observed behavior) test during the reporting period. This individual was a contractor supervisor, who tested positive for alcohol. All of these individuals were denied access to the Protected and Owner Controlled Area(s).  
There were no (0) Contractor Random Positive tests during the reporting period.

**LIST OF EVENTS REPORTED**

1. There was one (1) event reported to the NRC during the reporting period. On April 17, 2002, a contractor supervisor tested positive for alcohol. The individual was "For-Cause" tested after a co-worker reported observing the odor of alcoholic beverage. This incident was reported to the NRC in accordance with 10-CFR-26.73. The individual was subsequently denied access to the Protected and Owner Controlled Area(s).

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

AmerGen Energy Company LLC		June 30, 2002
Company	6 Months Ending	
Oyster Creek Nuclear Generating Station Forked River, NJ	Operating License and Docket DPR-16/Docket 50-219 (OC)	
Location		
R. Ewart	(609) 971 - 4949	
Contact Name	Phone (Include Area Code)	
CUTOFFS: SCREEN/CONFIRMATION (ng/ml)      APPENDIX A TO 10CFR26		
MARIJUANA	/	/
COCAINE	/	/
OPIATES	/	/

TESTING RESULTS		LICENSEE EMPLOYEES		LONG-TERM CONTRACTOR PERSONNEL		SHORT-TERM CONTRACTOR PERSONNEL	
		# TESTED	# POSITIVE	# TESTED	# POSITIVE	# TESTED	# POSITIVE
AVERAGE NUMBER WITH UNESCORTED ACCESS		509		N/A		233	
CATEGORIES		# TESTED	# POSITIVE	# TESTED	# POSITIVE	# TESTED	# POSITIVE
PRE-ACCESS		18	0	0	0	204	3
FOR CAUSE	POST ACCIDENT	3	0	0	0	2	0
	OBSERVED BEHAVIOR	1	0	0	0	1	1
RANDOM		178	0	0	0	104	0
FOLLOW-UP		11	0	0	0	2	0
OTHER		0	0	0	0	0	0
TOTAL		211	0	0	0	313	4

**PERFORMANCE DATA FOR PERSONNEL SUBJECT TO 10 CFR 26  
 REPORT PERIOD JANUARY 2002 – JUNE 2001  
 OYSTER CREEK - PAGE 2**

**BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES  
 (OYSTER CREEK)**

	MARIJUANA	COCAINE	OPIATES	AMPHE- TAMINES	PHENCY- CLIDINE	ALCOHOL	REFUSAL TO TEST	
LICENSEE EMPLOYEES	0	0	0	0	0	0	0	
LONG-TERM CONTRACTORS	0	0	0	0	0	0	0	
SHORT-TERM CONTRACTORS	1	1	1	0	0	1	0	
TOTAL	1	1	1	0	0	1	0	4

## **Attachment 5**

Mid-Atlantic Regional Operating Group

And Corporate

Fitness-For-Duty Performance Data

January 2002 through June 2002

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

Exelon Nuclear

Company

June 30, 2002

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	
Average Number with Unescorted Access		1747				748	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		4	0			2	0
FOR CAUSE	Post accident	1	0			1	0
	Observed behavior	0	0			0	0
Random		74	0			1	0
Follow-up		13	1			0	0
Other		2	0			0	0
<b>Total</b>		<b>94</b>	<b>1</b>			<b>4</b>	<b>0</b>

Breakdown of Confirmed Positive Tests for Specific Substances:

Corporate and Mid-Atlantic Regional Operating Group Headquarters - June 30, 2002

	Marjuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	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						<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>0</b>						<b>1</b>

Attachment 5  
Summary of Data Analysis and Management Actions  
Corporate and Mid-Atlantic ROG Headquarters  
January – June 2002

I. Initiatives Taken

Nineteen (19) Exelon Fitness For Duty procedures are currently being revised in the Mid-Atlantic Regional Operating Group (MAROG) and Mid-West Regional Operating Group (MWROG) for incorporation into one common set of procedures.

II. Management Actions

During the period, one (1) Exelon employee tested positive at Corporate and Mid-Atlantic ROG Headquarters. The test was a follow-up test. Unescorted access was temporarily suspended in the case of the Exelon employee who tested positive for marijuana, pending confirmation and Medical Review Officer (MRO) verification. Unescorted access was subsequently denied once the MRO verification was received. The employee was referred for treatment/rehabilitation.

III. Events Reported Under 10 CFR 26.73

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

IV. Audits/Inspections

During the period, an assessment to evaluate the Fitness For Duty program was conducted by Nuclear Oversight personnel. The assessment found that the Exelon FFD drug and alcohol testing activities were determined to be performed satisfactorily in accordance with 10 CFR Part 26.

There were no findings generated during the period.

There were two (2) Condition Reports (CRs) generated during the assessment period.

1. CR 97670 - Attachment 3 to SY-MA-102-203 was covered up at the counter where individuals report for drug and alcohol testing. Therefore, the individuals did not have a copy of the Drug & Alcohol Testing Information and Instructions to read prior to testing activities. DrugScan immediately retrieved the information sheet and placed it on the counter. DrugScan instructed everyone to read the Attachment 3 prior to signing the consent form.
2. CR 97676 - A procedure violation was identified with regards to processing of abnormal FFD specimens. SY-MA-102-220, section 4.5, states that if the specific gravity is less than 1.003, the collection person (CP) is required to ask the individual if he/she is taking diuretics or is a diabetic. This is to be documented in the remarks section of the chain of custody (COC) and the Permanent Record book. Individuals were documenting this information in the section for medications taken within the past 30 days. Alternatively, DrugScan does instruct individuals to record these requirements in the remarks section of the COC and the Permanent Record Log book.

V. Random Testing Rate

Exelon Nuclear MAROG Corporate Office, LGS and PBAPS maintain 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 51.3% 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 the Corporate and Mid-Atlantic ROG Headquarters. It is estimated that the specimen would not have tested positive using the 100 ng/ml immunoassay cut-off level.