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Michael R Kansler
President

February 26, 2003
JPN-03-004
NL-03-036
ENO 1.2.03.031
BVY 03-20

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

SUBJECT: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point Nuclear Generating Units No. 1, 2 and 3
Docket Nos. 50-003, 50-247, and 50-286
Pilgrim Nuclear Power Station
Docket No. 50-293
Vermont Yankee Nuclear Power Station
Docket No. 50-271
Fitness-for-Duty Program Performance Report
For the Period July – December 2002

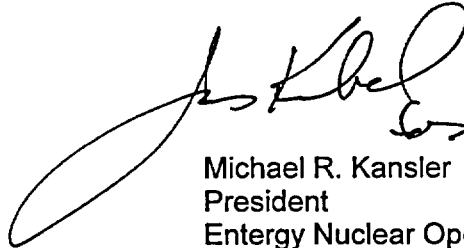
Dear Sir or Madam:

This letter transmits the James A. FitzPatrick, Indian Point 1, Indian Point 2, Indian Point 3, Pilgrim, and Vermont Yankee Fitness-for-Duty Program performance reports for the period from July through December 2002 in accordance with the requirements of 10 CFR 26.71(d). The FitzPatrick report is Attachment I; the Indian Point 1, 2, and 3 report is Attachment II; the Pilgrim report is Attachment III, and the Vermont Yankee report is Attachment IV.

A021

There are no new commitments made in this letter. If you have any questions, please contact Ms. Charlene Faison at 914-272-3378.

Very truly yours,



Michael R. Kansler
President
Entergy Nuclear Operations, Inc.

Attachments: As stated

cc:

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Buchanan, NY 10511

Resident Inspector's Office
US Nuclear Regulatory Commission
P.O. Box 136
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Mr. Guy Vissing, Project Manager
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USNRC Resident Inspector
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120 State Street
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Mr. Paul Eddy
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Albany, NY 12223

ATTACHMENT I TO JPN-03-004 / NL-03-036 / ENO 1.2.03.031 / BVY 03-20

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

**FITNESS FOR DUTY PROGRAM
PERFORMANCE REPORT FOR
JULY THROUGH DECEMBER 2002**

**ENTERGY NUCLEAR OPERATIONS, INC.
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333
DPR-59**

Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
Fitness-for-Duty Program Performance Report
For the Period July through December 2002

INTRODUCTION

10 CFR 26.71(d) requires that nuclear power plant licensees periodically collect, compile and submit Fitness-for-Duty performance data. Specifically, this performance data must include:

1. Random testing rate;
2. Drugs tested for and cutoff levels, including results of tests using lower cutoff levels;
3. Workforce population tested;
4. Numbers of tests and results by population and type of test (i.e., pre-access, random, for-cause, etc.);
5. Substances identified;
6. Summary of management actions; and
7. A list of events reported.

Fitness-for-Duty performance data for Entergy's James A. FitzPatrick Nuclear Power Plant for the period July through December 2002 are provided below and in the attached tables. Data on random testing rate, a summary of management actions, and a list of events reported (items 1, 6 and 7) are given below. Data for the remaining items (2, 3, 4 and 5) are given in the attached tables.

An additional section not required by 10 CFR 26 is included in this report. The additional section summarizes events related to the FitzPatrick Fitness-for-Duty program and lessons learned.

Entergy considers all contractors to be short-term contractors for the purposes of the Fitness-for-Duty Program. For this reason, the attached tables show "N/A" for data associated with long-term contractors.

RANDOM TESTING RATE

For this period, 28.9% of employees were tested randomly. The annual rate for 2002 is 57.1%. For this period, 64.3% of contractors were tested randomly with an annual rate of 125.5%. The relatively higher rate for contractors is due to the procedural safeguards in place to accommodate delayed testing of occasional vendors.

SUMMARY OF MANAGEMENT ACTIONS

Entergy used the definition of "Management Actions" implicit in 10 CFR 26.27 ("Management actions and sanctions to be imposed") to determine the content of this section.

Pre-Access Testing

A total of 967 pre-access tests were administered for employees and contractors. One prospective employee pre-access test was positive for marijuana. Access was denied for this individual for a period of 3 years.

Seven contractor pre-access tests were positive (4 were for marijuana, 1 for opiates, 1 for alcohol, and 1 for refusal to test). The individual who tested positive for alcohol refused to finish the testing process so it was considered a refusal to test also. Another individual was recorded as a refusal to test because the individual had given a first specimen that was tested as having a very high level of nitrate. The individual was told that he had to provide an observed specimen, but left the testing facility without doing the repeat observed test. This is considered a positive refusal to test although the first test result was negative. Access was denied for all of these individuals for a period of 1 year.

Employee Random Testing

A total of 272 employee random tests were administered. All test results were negative.

Contractor Personnel Random Testing

A total of 202 contractor random tests were administered. All test results were negative.

For Cause Testing

There were 7 for-cause tests performed during this period. Three (3) employee for-cause tests were performed (1 for post-accident and 2 for observed behavior). All test results were negative. There were 4 contractor for-cause tests performed (1 for post-accident and 3 for observed behavior). Two of the observed behavior test results were positive for alcohol, and these contractors were denied access for three years with proof of rehabilitation.

Follow Up Testing

There were (8) employee and (17) contractor follow up tests administered this reporting period, and all test results were negative.

Other

This category includes tests repeated because the results of the specimen were negative but the specimen was determined by the laboratory to have either a low specific gravity or a low concentration of creatinine. There were 26 tests conducted and all test results were negative.

Events Reported

No events were reported this period.

Lessons Learned and Program Events

No negative performance indicators were identified during this period.

**Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant**

**Fitness for Duty Program Performance Data
Personnel Subject to 10CFR26**

<u>Entergy Nuclear Operations, Inc</u> Company		<u>12-31-02</u> 6 Months Ending					
<u>James A. FitzPatrick Nuclear Power Plant</u> Location							
<u>Pamela D. Stell</u> Contact Name		<u>(315) 349-6412</u> Phone (include area code)					
Cutoffs: Screen/Confirmation (ng/ml) [X] Appendix A to 10 CFR 26							
Marijuana	100	/	15	Amphetamines	1000	/	500
Cocaine	300	/	150	Phencyclidine	25	/	25
Opiates	300	/	300	Alcohol(%BAC)	0.04	/	0.04
		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		942		N/A		314	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		39	1	N/A	N/A	928	7
For Cause	Post accident	1	0	N/A	N/A	1	0
	Observed behavior	2	0	N/A	N/A	3	2
Random		272	0	N/A	N/A	202	0
Follow-up		8	0	N/A	N/A	17	0
Other		2-DOT 3-Atypical	0	N/A	N/A	21-Atypical	0
Total		327	1	N/A	N/A	1,172	9

Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant

Fitness for Duty Program Performance Data

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phency- clidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees/ Prospective Employees	1	0	0	0	0	0	0						
Contractors	4	0	1	0	0	3	2*						
Total	5	0	1	0	0	3	2						11*

*The "Refusal to Test" number includes one individual who was tested positive for alcohol, but refused to complete the urine test. This individual was counted as both positive for alcohol and refusal to test.

ATTACHMENT II TO JPN-03-004 / NL-03-036 / ENO 1.2.03.031 / BVY 03-20

INDIAN POINT NUCLEAR GENERATING UNITS NO. 1, 2, and 3

**FITNESS FOR DUTY PROGRAM
PERFORMANCE REPORT FOR
JULY THROUGH DECEMBER 2002**

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNIT NO. 1
DOCKET NO. 50-003
DPR-5
INDIAN POINT NUCLEAR GENERATING UNIT NO. 2
DOCKET NO. 50-247
DPR-26
INDIAN POINT NUCLEAR GENERATING UNIT NO. 3
DOCKET NO. 50-286
DPR-64

Entergy Nuclear Operations, Inc.
Indian Point Energy Center Units No.1, 2, 3
Fitness-For-Duty Program Performance Report
For the Period July through December 2002

INTRODUCTION

10 CFR 26.71(d) requires that nuclear power plant licensees periodically collect, compile and submit Fitness-For-Duty performance data. Specifically, this performance data must include:

1. Random testing rate;
2. Drugs tested for and cutoff levels, including results of tests using lower cutoff levels and tests for other drugs;
3. Workforce population tested;
4. Numbers of tests and results by population and type of test (i.e., pre-access, random, for cause, etc.);
5. Substances identified;
6. Summary of management actions; and
7. A list of events reported.

Fitness-For-Duty performance data for the Entergy's Indian Point Energy Center for the period from July through December 2002 are provided below and in the attached tables. The random testing rate, a summary of management actions, and a list of events reported (items 1,6,and 7) are given below. Data for the remaining items (2,3,4, and 5) are given in the attached tables.

An additional section not required by 10CFR26 is included in this report. The additional section summarizes events related to the Indian Point Energy Center Fitness-For-Duty program and lessons learned.

Entergy considers all contractors to be short-term for the purposes of the Fitness-For Duty program. For this reason, the attached tables show "N/A" for data associated with long-term contractors.

RANDOM TESTING RATE

For this period 28.1% of the personnel in the testing pool were tested randomly. The annual test rate for 2002 is 55.2%.

SUMMARY OF MANAGEMENT ACTIONS

Entergy used the definition of "Management Actions" implicit in 10 CFR 26.27 ("Management actions and sanctions to be imposed") to determine the content of this section.

Pre-Access Testing

A total of 814 pre-access tests were performed. All employee pre-access tests were negative.

There were thirteen positive contractor pre-access tests. Three of the contractors were tested positive for alcohol. These individuals were denied access for one year. Six contractors were tested positive for marijuana and four were positive for cocaine. These individuals were denied access for three years.

Employee Random Testing

There were 440 random tests conducted for licensee employees. One employee tested positive for marijuana. This was the second positive for this employee, which resulted in his unescorted access being revoked and his employment would have been terminated permanently. The employee resigned instead.

Contractor Personnel Random Testing

There were 188 contractor random tests conducted. All contractor random test results were negative.

For-Cause Testing

There were 14 employee for-cause tests performed during this period. Ten were as a result of post-accidents involving minor vehicular incidents and one for an employee falling on a grate. The other three for-cause tests were performed as a result of behavior concerns. All test results were negative.

There were 25 contractor for-cause tests performed. Eleven were as a result of minor post-accident incidents and 14 were behavioral concerns. All test results were negative.

Follow-up Testing

There were 59 (22 employees and 37 contractors) follow-up tests conducted during this period. All test results were negative.

Other

This category includes tests repeated because the results of the specimen were negative but the specimen was determined by the laboratory to have either a low specific gravity or a low concentration of creatinine.

There was one test cancelled by the laboratory due to a broken seal on the specimen. Another sample was re-collected and the test result was negative.

One contractor individual refused to test after being requested to have a for-cause test performed after a smell of alcohol was detected on his breath. The individual did not have unescorted access but was working in the Owner Controlled Area (OCA). The contractor's employer was notified and the individual was denied access to the site permanently.

EVENTS REPORTED

There were no reportable events during this period. No performance indicators were identified during this period.

LESSONS LEARNED AND PROGRAM EVENTS

In 2002, Quality Assurance conducted an employee survey on the FFD program, which identified that employees were not very familiar with the for-cause testing protocol and requirements. As a result, an aggressive approach was initiated to supply additional information to the employees on Continuous Behavioral Observation and for-cause testing. This increased awareness has resulted in an increase in the number of for-cause tests that were performed.

**Entergy Nuclear Operations, Inc.
Indian Point Energy Center Units 1,2 and 3
For the Period July through December 2002**

Personnel Subject to 10CFR26

<u>Entergy Nuclear Operations, Inc</u> Company		<u>December 31, 2002</u> 6 Months Ending					
<u>Indian Point Energy Center</u> Location							
<u>Sharon Quinn</u> Contact Name		<u>(914) 788-2193</u> Phone (include area code)					
Cutoffs: Screen/Confirmation (ng/ml) [X] Appendix A to 10 CFR 26							
Marijuana	50 / 15	Amphetamines /	1,000 / 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		1530		N/A		701	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		50	0	N/A	N/A	764	13
For Cause	Post accident	11	0	N/A	N/A	11	0
	Observed behavior	3	0	N/A	N/A	14	0
Random		440	1	N/A	N/A	188	0
Follow-up		22	0	N/A	N/A	37	0
Other		0	0	N/A	N/A	2	1
Total		526	1	N/A	N/A	1016	14

**Entergy Nuclear Operations, Inc.
Indian Point Energy Center Unit 1,2 and 3
Fitness for Duty Program Performance Data
For the Period July through December 2002**

Breakdown of Confirmed Positive Tests for Specific Substances

	Marjuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	1	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Short-Term Contractors	6	4	0	0	0	3	1	N/A	N/A	N/A	N/A	N/A	
Total	7	4	0	0	0	3	1	N/A	N/A	N/A	N/A	N/A	15

ATTACHMENT III TO JPN-03-004 / NL-03-036 / ENO 1.2.03.031 / BVY 03-20

PILGRIM NUCLEAR POWER STATION

**FITNESS FOR DUTY PROGRAM
PERFORMANCE REPORT FOR
JULY THROUGH DECEMBER 2002**

**ENTERGY NUCLEAR OPERATIONS, INC.
PILGRIM NUCLEAR POWER STATION
DOCKET NO. 50-293
DPR-35**

Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Fitness-For-Duty Program Performance Report
For the Period July through December 2002

INTRODUCTION

10 CFR 26.71(d) requires that nuclear power plant licensees periodically collect, compile, and submit Fitness-For-Duty performance data. Specifically, this performance data must include:

1. Random testing rate;
2. Drugs tested for and cutoff levels, including results of tests using lower cutoff levels and tests for other drugs;
3. Workforce population tested;
4. Numbers of tests and results by population and type of test (i.e. pre-access, random, for cause, etc.);
5. Substances Identified;
6. Summary of management actions;
7. A list of events reported.

Fitness-For-Duty performance data for the Entergy's Pilgrim Nuclear Power Plant for the period from July through December 2002 are provided below and in the attached tables. The random testing rate, a summary of management actions, and a list of events reported (items 1, 6, and 7) are given below. Data for the remaining items (2,3,4, and 5) are given in the attached tables.

An additional section not required by 10CFR26 is included in this report. The additional section summarizes events related to the Pilgrim Fitness-For-Duty program and lessons learned.

Entergy considers all contractors to be short-term for the purposes of the Fitness-For-Duty program. For this reason, the attached tables show " N/A " for data associated with long-term contractors.

RANDOM TEST RATE

During this period, 32.8% of the total workforce was tested. The annual test rate for 2002 is 61.5%.

SUMMARY OF MANAGEMENT ACTIONS

Entergy used the definition of "Management Actions" implicit in 10 CFR 26.27 ("Management actions and sanctions to be imposed") to determine the content of this section.

Pre-Access Testing

During this period, a total of 138 pre-access tests were administered. Twenty- five tests were for licensee employees and the other 113 tests were contractors. All test results were negative.

Employee Random Testing

During this period, there were 250 random tests conducted on licensee employees. All test results were negative.

Contractor Personnel Random Testing

There were 64 contractor random tests conducted during this period. All test results were negative.

For-Cause Testing

There were a total of 8 for cause tests performed during this period. All test results were negative.

Follow-up Testing

A total of 35 follow-up tests were performed during this period. Thirty (30) were for licensee employees and five (5) were for contractors. All test results were negative.

Other

This category includes tests repeated because the results of the specimen were negative but the specimen was determined by the laboratory to have either a low specific gravity or a low concentration of creatinine. For this period, there were no abnormal integrity checks required.

EVENTS REPORTED

There were no events during this time period (July through December) that required reporting to the NRC.

LESSONS LEARNED AND PROGRAM EVENTS

No negative performance indicators were identified during this period.

ATTACHMENT III TO JPN-03-004 / NL-03-036 / ENO 1.03.031 / BVY 03-20

Entergy Nuclear Operations, Inc.
 Pilgrim Nuclear Power Station
 Fitness for Duty Program Performance Data
 For the Period July through December 2002

Personnel Subject to 10CFR26

<u>Entergy Nuclear Operations, Inc.</u> Company		<u>December 31, 2002</u> 6 Months Ending					
<u>Pilgrim Nuclear Power Station</u> Location							
<u>Reg Rose</u> Contact Name		<u>(508) 830-8788</u> Phone (include area code)					
Cutoffs: Screen/Confirmation (ng/ml) [X] Appendix A to 10 CFR 26							
Marijuana	50/100 / 15	Amphetamines	1000 / 500				
Cocaine	300 / 150	Phencyclidine	25 / 25				
Opiates	300 / 300	Alcohol (%BAC)	0.04% / 0.04%				
Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		737.39		N/A		220.10	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		25	0	N/A	N/A	113	0
For Cause	Post accident	2	0	N/A	N/A	3	0
	Observed behavior	3	0	N/A	N/A	0	0
Random		250	0	N/A	N/A	64	0
Follow-up		30	0	N/A	N/A	5	0
Other		0	0	N/A	N/A	0	0
Total		310	0	N/A	N/A	185	0

Entergy Nuclear Operations, Inc.
 Pilgrim Nuclear Power Station
 Fitness For Duty Program Performance Data
 For the Period July through December 2002

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana 50 ng	Marijuana 100 ng	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	
Contractors	0	0	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	
Total	0	0	0	0	0	0	0	0	N/A	N/A	N/A	N/A	N/A	0

ATTACHMENT IV TO JPN-03-004 / NL-03-036 / ENO 1.2.03.031 / BVY 03-20

VERMONT YANKEE NUCLEAR POWER STATION

**FITNESS FOR DUTY PROGRAM
PERFORMANCE REPORT FOR
JULY THROUGH DECEMBER 2002**

**ENTERGY NUCLEAR OPERATIONS, INC.
Vermont Yankee Nuclear Power Station
Docket No. 50-271
DPR-28**

Entergy Nuclear Operations, Inc.
Vermont Yankee Nuclear Power Station
Fitness-For-Duty Program Performance Report
For the Period July through December 2002

INTRODUCTION

10 CFR 26.71(d) requires that nuclear power plant licensees periodically collect, compile, and submit Fitness-For-Duty performance data. Specifically, this performance data must include:

1. Random testing rate;
2. Drugs tested for and cutoff levels, including results of tests using lower cutoff levels and tests for other drugs;
3. Workforce population tested;
4. Numbers of tests and results by population and type of test (i.e. pre-access, random, for cause, etc.);
5. Substances Identified;
6. Summary of management actions;
7. A list of events reported.

Fitness-For-Duty performance data for the Entergy's Vermont Yankee Nuclear Power Plant for the period from July through December 2002 are provided below and in the attached tables. The random testing rate, a summary of management actions, and a list of events reported (items 1, 6, and 7) are given below. Data for the remaining items (2, 3, 4, and 5) are given in the attached tables.

RANDOM TEST RATE

During this period, 25.7% of the total workforce was tested. In calculating the annual test rate for 2002, it was determined that only an annual rate of 46.7% was achieved which is below the minimum 50% annual testing rate requirement. An Event Report (ER #20030351) has been written to document this deficiency, and to evaluate the cause and corrective actions needed.

SUMMARY OF MANAGEMENT ACTIONS

Entergy used the definition of "Management Actions" implicit in 10 CFR 26.27 ("Management actions and sanctions to be imposed") to determine the content of this section.

Pre-Access Testing

For the period from July through December of 2002, a total of 719 pre-access tests were administered. 28 of these tests were licensee employees. 101 of these tests were long-term contractors. The other 590 tests were short-term contractors.

Two long-term contractors had positive results (1 for alcohol and 1 for Cocaine). Access was denied for the contractor tested positive for Cocaine. The other long-term contractor was already badged at Vermont Yankee, but was tested positive for alcohol under Pre-Access testing when he applied for permanent employment with Entergy. Although his access privilege was kept, his application for permanent employment was not accepted and he was put on accelerated monitoring and testing. All the follow-up testings to-date have been negative.

Four short-term contractors had positive results (3 for Marijuana and 1 for Cocaine). Access was denied for these contractors.

Employee Random Testing

Between July and December of 2002, there were 151 random tests conducted for licensee employees. None of these had positive results.

Contractor Personnel Random Testing

There were 63 long-term contractor random tests and 42 short-term contractor random tests conducted between July and December 2002. None were positive.

For-Cause Testing

There were no for cause tests performed during this period.

Follow-up Testing

A total of 3 follow-up tests were performed during the last 6 months of 2002. All three were long-term contractor follow-up tests, none of which were positive.

Other

Between July and December 2002, no abnormal integrity checks were required.

EVENTS REPORTED

At the end of the last reporting period, there was an event reported noting interpretation of the number of blind samples caused an insufficient number to be sent to the lab. During this time period (July through December) an accelerated testing rate was accomplished to ensure the integrity of the program.

LESSONS LEARNED AND PROGRAM EVENTS

A computerized calculation will determine the number of blind samples to be sent in the future.

Fitness For Duty Program

Edit Date Ranges

Semi-Annual Performance Data Report - Personnel Subject to 10CFR26

Section I - Company Data

Company Vermont Yankee Nuclear Power	Six-Month Period: 07/01/2002 - 12/31/2002																
Location: Governor Hunt Road P.O Box 157 Vernon, VT 05354	<table border="1"> <thead> <tr> <th>Drugs Tested For</th> <th>Screen/Confirmation (ng/ml)</th> </tr> </thead> <tbody> <tr> <td>Marijuana</td> <td>100/15</td> </tr> <tr> <td>Marijuana</td> <td>50/15</td> </tr> <tr> <td>Cocaine</td> <td>300/150</td> </tr> <tr> <td>Opiates</td> <td>300/300</td> </tr> <tr> <td>Amphetamines</td> <td>1000/500</td> </tr> <tr> <td>Phencyclidine</td> <td>25/25</td> </tr> <tr> <td>Alcohol (%BAC)</td> <td>0.04% BAC</td> </tr> </tbody> </table>	Drugs Tested For	Screen/Confirmation (ng/ml)	Marijuana	100/15	Marijuana	50/15	Cocaine	300/150	Opiates	300/300	Amphetamines	1000/500	Phencyclidine	25/25	Alcohol (%BAC)	0.04% BAC
Drugs Tested For	Screen/Confirmation (ng/ml)																
Marijuana	100/15																
Marijuana	50/15																
Cocaine	300/150																
Opiates	300/300																
Amphetamines	1000/500																
Phencyclidine	25/25																
Alcohol (%BAC)	0.04% BAC																
Point of Contact Fred Marcussen, Security Manager																	
Phone #: 802 258 5838																	

Section II - Testing Results

Average Number with Unescorted Access	Licensee Employees			Long-Term Contractors			Short-Term Contractors		
	492			338			168		
Categories	# Tested	# Positive	# Refused	# Tested	# Positive	# Refused	# Tested	# Positive	# Refused
Pre-Access	28	0	0	101	2	0	590	4	0
For-Cause: Post-Accident	0	0	0	0	0	0	0	0	0
For-Cause: Observed	0	0	0	0	0	0	0	0	0
Random	151	0	0	63	0	0	42	0	0
Follow-up	0	0	0	3	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
Totals	179	0	0	167	2	0	632	4	0

Section III - Breakdown of Confirmed Positive Tests for Specific Substances

	Refusal to Test	Marijuana		Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Total
		100/15	50/15						
Licensee Employees	0	0	0	0	0	0	0	0	0
Long-Term Contractors	0	0	0	1	0	0	0	1	2
Short-Term Contractors	0	3	0	1	0	0	0	0	4
Totals	0	3	0	2	0	0	0	1	6