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Vice President, Nuclear Generation

Fermi 2  
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**DTE Energy**



10CFR73.71

March 5, 2003  
NRC-03-0020

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington D C 20555

Reference: Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43

Subject: Safeguards Event Report (SER) No. 03-S01

Please find enclosed Safeguards Event Report (SER) No. 03-S01, describing an event in which a contract employee was inadvertently granted unescorted access to the Fermi 2 Protected Area prior to verification of his fitness for duty (FFD) drug testing results.

The following commitment is being made in this report:

“Security implementing procedure, SEP-AD4-02, ‘FFD Drug and Alcohol Testing’ will be revised to formally require a second check following data entry in the FFD drug screen field.” This revision will be completed by June 30, 2003.

Should you have any questions or require additional information, please contact Mr. Joseph H. Korte of my staff at (734) 586-1095.

Sincerely,

A handwritten signature in black ink that reads "William T. O'Connor, Jr." with a large, stylized flourish at the end.

cc: M. A. Ring  
J. F. Stang, Jr.  
NRC Resident Office  
Region III  
Regional Administrator, Region III  
Supervisor, Electric Operators,  
Michigan Public Service Commission

*IEPA*

Estimated burden per response to comply with this mandatory information collection request. 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to [hs1@nrc.gov](mailto:hs1@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

# LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

1. FACILITY NAME <b>Fermi 2</b>	2. DOCKET NUMBER <b>05000341</b>	3. PAGE <b>1 OF 3</b>
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4. TITLE  
**Unescorted Access Granted Prior to Verification of Fitness for Duty (FFD) Drug Testing Results**

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
02	03	2003	2003	S01	00	03	05	2003	Fermi 2	05000

9. OPERATING MODE <b>1</b>	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 50 (Check all that apply)				
	20.2201(b)	20.2203(a)(3)(ii)	50.73(a)(2)(ii)(B)	50.73(a)(2)(ix)(A)	
10. POWER LEVEL <b>100</b>	20.2201(d)	20.2203(a)(4)	50.73(a)(2)(iii)	50.73(a)(2)(x)	
	20.2203(a)(1)	50.36(c)(1)(i)(A)	50.73(a)(2)(iv)(A)	X 73.71(a)(4)	
	20.2203(a)(2)(i)	50.36(c)(1)(ii)(A)	50.73(a)(2)(v)(A)	73.71(a)(5)	
	20.2203(a)(2)(ii)	50.36(c)(2)	50.73(a)(2)(v)(B)		OTHER Specify in Abstract below or in NRC Form 366A
	20.2203(a)(2)(iii)	50.46(a)(3)(ii)	50.73(a)(2)(v)(C)		
	20.2203(a)(2)(iv)	50.73(a)(2)(i)(A)	50.73(a)(2)(v)(D)		
	20.2203(a)(2)(v)	50.73(a)(2)(i)(B)	50.73(a)(2)(vii)		
	20.2203(a)(2)(vi)	50.73(a)(2)(i)(C)	50.73(a)(2)(viii)(A)		
	20.2203(a)(3)(i)	50.73(a)(2)(ii)(A)	50.73(a)(2)(viii)(B)		

12. LICENSEE CONTACT FOR THIS LER

NAME <b>Joseph H. Korte, Manager – Nuclear Security</b>	TELEPHONE NUMBER (Include Area Code) <b>(734) 586-1095</b>
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED				15. EXPECTED SUBMISSION DATE		MONTH	DAY	YEAR
YES (if yes, complete EXPECTED SUBMISSION DATE).	X	NO						

16. ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

A contract employee was inadvertently granted unescorted access to the Fermi 2 Protected Area (but not the Vital Area) on January 31, 2003, prior to verification of his fitness for duty (FFD) drug testing results. This discrepancy was discovered on February 3, 2003, when the Medical Review Officer informed Detroit Edison that this individual had a positive drug test result. The individual's keycard was revoked, and it was verified that he had never actually gained entry into the Protected Area. The cause of this event was a combination of human performance issues, compounded by the lack of adequate direction for verification of data entry in the security implementing procedure. Immediate corrective actions were taken to review all applicants awaiting FFD drug test results to verify that no other personnel had been granted unescorted access prior to receipt of their drug screen results, and to institute a second check for FFD data entry. Security implementing procedure, SEP-AD4-02, "FFD Drug and Alcohol Testing" will be revised to formally require this second check following data entry. Additionally, the Manager-Nuclear Security has conducted briefings with appropriate Security Department personnel to reinforce the proper use of the human performance tools.

**LICENSEE EVENT REPORT (LER)**

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		2003	- S01	- 00		

17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

**Initial Plant Conditions:**

Mode 1  
Reactor Power 100 percent

**Description of the Event**

A contract employee was inadvertently granted unescorted access to the Fermi 2 Protected Area (but not the Vital Area) on January 31, 2003, prior to verification of his fitness for duty (FFD) drug testing results. This individual had provided an initial drug screen sample, along with approximately 60 other contract individuals being inprocessed that week, in preparation for being granted unescorted access for the upcoming refueling outage. Test results for the majority of those tested on January 27 and 28, 2003 were received on January 29, 2003, and were input into the access authorization computer system. Although the test results for this individual had not been received as of January 29, data indicating that his FFD drug test results were negative was inadvertently entered into the access authorization computer system along with the others who actually had received negative drug test results. This discrepancy was discovered on February 3, 2003, when the Medical Review Officer informed Detroit Edison that this individual had a positive drug test result. The individual's keycard was immediately revoked upon discovery that he had been granted unescorted access to the Protected Area and the individual was notified of its revocation. It was determined that this individual had not yet used his keycard to enter the Protected Area. A one hour, 10CFR73.71 notification was made to the NRC (Event #39556) on February 3, 2003.

**Cause of the Event**

The cause of this event was a combination of human performance issues, compounded by the lack of adequate direction for verification of data entry in the security implementing procedure. A relatively large number of specimens (approximately 60) were being processed during this period in preparation for the upcoming refueling outage. The Security Specialist responsible for administering the drug screening process inadvertently mixed the "NRC Drug Testing Custody And Control" and the "ALCO-SENSOR Record" forms having verified FFD test results, with those forms still awaiting results. This led to an improper data entry for one individual into the computerized security database. There was no second check to detect this error.

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17. NARRATIVE (If more space is required, use additional copies of NRC Form 366A)

**Analysis of the Event**

This event involved an individual who received access authorization to enter the Fermi 2 Protected Area, but who never actually used his keycard for entry. The access authorization was for the Protected Area only, not the Vital Area. A transaction report was generated for the keycard activity from January 29, 2003 through February 3, 2003. The report revealed no use of this individual's keycard. The individual was not involved in any safety-related work during the period he had unescorted access authorization. There was no evidence of unusual behavior that would cause his supervisor to take any action under the Behavior Observation Program. This event did not affect or threaten plant safety systems. Local law enforcement assistance was not required, nor was there any media interest. This event was evaluated using the NRC's Significance Determination Process. The vulnerability did not involve a malevolent act, and it was not a repeat occurrence; therefore, it appears to be of very low safety significance. Therefore, this event had no adverse impact on the health or safety of the public.

**Corrective Actions**

Immediate corrective actions were taken to review all applicants awaiting FFD drug test results to verify that no other personnel had been granted unescorted access prior to receipt of their drug screen results, and to institute a second check for FFD data entry. Security implementing procedure, SEP-AD4-02, "FFD Drug and Alcohol Testing" will be revised by June 30, 2003, to formally require this second check following data entry in the FFD drug screen field. Additionally, the Manager - Nuclear Security has conducted briefings with appropriate Security Department personnel to reinforce the proper use of the human performance tools. Further corrective actions to address findings identified in the root cause analysis report will be taken in accordance with the Fermi 2 corrective action program. This event is documented in CARD 03-13339.

**Additional Information**

- A. Failed Components: None
- B. Previous LERs on Similar Problems: None