FENOC

FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant
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Perry, Ohio 44081

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United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
Subject: Semiannual Fitness-For-Duty Report

Ladies and Gentlemen:

In accordance with the requirements of 10CFR26.71(d), "Recordkeeping Requirements," the Semiannual Fitness for Duty Report is being submitted for the Perry Nuclear Power Plant. This report covers the time period of January 1, 2003 through June 30, 2003.

Attachment 1 provides the Fitness for Duty Program performance data regarding testing results. Attachment 2 provides additional information regarding reported events and management actions taken in response to positive results. The provisions of the Fitness for Duty Program apply to persons granted unescorted access to the Protected Area of the plant, as well as to licensee, vendor, and contractor personnel required to physically report to the Technical Support Center or the Emergency Operations Facility in accordance with the Emergency Plan and associated implementing procedures.

If you have questions or required additional information, please contact Mr. Vernon K. Higaki, Manager – Regulatory Affairs at (440) 280-5294.

Very truly yours,

Attachments

cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III

A021

Fitness for Duty Program Performance Data Personnel Subject to 10CFR26

PNPP No. 8808 Rev. 6/92

AI-0010

FirstEnergy Corporation (FirstEnergy Nuclear Operating Company) — *Company*

June 30, 2003 — *6 Months Ending*

Perry Nuclear Power Plant - 10 Center Road - Perry, Ohio 44081 — *Location*

Joseph F. Slike, Access Authorization Supervisor — *Contact Name*

(440) 280-5850 — *Phone (include area code)*

Cutoffs: Screen/Confirmation (ng/ml) ☐ Appendix A to 10CFR26

Marijuana	50/15	Amphetamines	1,000/500
Cocaine	300/150	Phencyclidine	25/25
Opiates	300/300	Alcohol (%BAC)	.04%

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		932		N/A		532	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		101	2			1,133	35
For Cause	Post accident	1	0			2	0
	Observed behavior	1	0			14	3
Random		215	0			114	0
Follow-up		20	0			25	0
Other-		0	0			0	0
Total		338	2			1,288	38

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphe-tamines	Phency-clidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	1 / 1	0	0	0	0	1	0						
Long-Term Contractors	0	0	0	0	0	0	0						
Short-Term Contractors	5 / 15	8	1	0	0	3	15						
Total	16	8	1	0	0	4	15						44

Note: Under the heading of Marijuana, the number to the left of the slash indicates the number of tests deemed positive at the DHHS/NRC cut-off level. The number to the right of the slash indicates the number of tests that were deemed positive at the Perry Plant's more conservative testing cut-off levels. 44 specific substances have been reported for 40 personnel that tested positive indicating that some personnel tested positive for multiple substances.

Management Actions Taken

Drug and alcohol testing results for the reporting period are described in Attachment 1.

One (1) licensee employee tested positive for illegal drugs and one (1) licensee employee tested positive for alcohol during this reporting period. Both licensee employees did not hold unescorted access. Their positive test results occurred during pre-access testing. Both individuals were denied unescorted access to the Protected Area. Pursuant to Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty" requirements, individuals and/or their company representative were informed of the right to appeal, and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, neither have initiated steps to restore unescorted access.

Thirty-five (35) contractor personnel tested positive for illegal drugs and three (3) contractor personnel tested positive for alcohol during this reporting period. All contractor personnel, with the exception of one individual, did not hold unescorted access. The unescorted access for the one contractor personnel was terminated based on the positive result. All contractor employees testing positive for illegal drugs/alcohol were denied unescorted access to the Protected Area. Pursuant to Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty" requirements, individuals and/or their company representative were informed of the right to appeal, and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, none have initiated steps to restore unescorted access.

Twenty-three (23) individuals were subjected to unannounced follow-up testing during this reporting period, as a result of a Fitness for Duty Program concern. All follow-up test results were negative.

Initiatives Taken

Focus this reporting period was on providing Fitness for Duty Supervisory training to applicable incoming contractor personnel for Perry's Refueling Outage. Continued efforts were made on developing common Fitness for Duty Program for FENOC's three (3) nuclear sites. Multiple communications were distributed to site personnel concerning the Overtime Guidelines Program, which is part of Perry's Fitness for Duty Program. This communication was in an effort to further educate site personnel to their responsibilities.

Operational Experience 16047, "Contractor Craft Use of Adulteration Product" was distributed to the industry. Details of this event are provided in the "Reported Events" section.

Reported Events

Although the contractor craft use of an adulteration product did not fall into the reporting criteria outlined in 10 CFR Part 26.73, the NRC was contacted and informed of the event. Nine (9) contractor personnel were determined to have attempted to subvert the drug testing process through adulteration. The majority of these contractor personnel used a synthetic urine product called "Minuteman". These contractor personnel were denied unescorted access to the Protected Area for "failure to cooperate", falsification of their Chain-of-Custody Form, and in some cases falsification of their Self-Disclosure Questionnaire. Four (4) contractor personnel were suspected of adulteration based on observations during the drug/alcohol collection process. These contract personnel did not cooperate with the testing process and were denied unescorted access to the

Protected Area for "failure to cooperate." A thorough investigation, Report # CO-0037, has been completed on this incident and is available for review. Pursuant to Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty" requirements, a determination of "failure to cooperate" is considered and processed as a confirmed positive drug result.