

ENERGY NORTHWEST

P.O. Box 968 ■ Richland, Washington 99352-0968

August 29, 2003
GO2-03-138

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
FITNESS FOR DUTY SEMIANNUAL PERFORMANCE DATA REPORT
JANUARY 1 TO JUNE 30, 2003**

Dear Sir or Madam:

Pursuant to 10 CFR 26.71(d), enclosed is the Energy Northwest Fitness for Duty (FFD) Semiannual Performance Data Report for January 1 to June 30, 2003. The data has been analyzed. No program weaknesses were identified during this reporting period.

Should you have any questions or desire additional information regarding this matter, please call me or Steve Scammon, Manager, Resource Protection at (509) 377-4280.

Respectfully,



DK Atkinson
Vice President, Technical Services
Mail Drop PE08

Attachment: Columbia Generating Station, Fitness for Duty Program, Performance Data Report for January 1 to June 30, 2003.

cc: TP Gwynn - NRC RIV
BJ Benney - NRC NRR
NRC Sr. Resident Inspector - 988C
RN Sherman - BPA - 1399
TC Poindexter - Winston & Strawn

AOZI

**Fitness for Duty Program
Performance Data
Personnel Subject to 10 CFR 26**

<u>Energy Northwest</u> Company	<u>June 30, 2003</u> 6 months ending
<u>Columbia Generating Station</u> Location	
<u>Steve Scammon, Manager Resource Protection</u> Contact Name	<u>(509) 377-4280</u> Phone

Cutoffs: Screen/Confirmation (ng/ml)

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 Contractors		Short Term Contractors	
	Average Number with Unescorted Access: 1614	1247	193	174		
Categories	# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access	219	3/2*	51	1	824	17/8*
For Cause Post-Accident	3	0	0	0	1	0
For Cause Observed Behavior	6	1	0	0	1	1
Random	477	2	73	0	81	1
Follow-Up	19	1	2	0	13	1
Pre-Employment	73	1	16	0	35	2
Other	0	0	0	0	1	0
Return to Duty	0	0	0	0	4	0
Total	797	8/2*	142	1	960	22/8*

*Number of Medical Review Officer Verified Positive Test Results / Number of Substituted or Adulterated Samples Submitted and Refusals to Test

Fitness for Duty
 Performance Data Report
 Personnel Subject to 10 CFR 26

Breakdown of Confirmed Positive Tests for Specific Substances:

	THC 50 ng/ml	THC 100 ng/ml	Cocaine	Opiates	Amphetamine	PCP	Alcohol	THC & Amphetamine	Refuse To Test	Adulterated Sample	Substitute Sample
Licensee Employees	2	2	2	0	1	0	1	0	1	1	0
Long Term Contractors	0	0	0	0	1	0	0	0	0	0	0
Short Term Contractors	3	12	0	0	5	0	1	1	6	0	2
Total	5	14	2	0	7	0	2	1	7	1	2

One oxidant-adulterated sample submitted on a pre-access test resulted in an observed sample collection for cause that confirmed positive for THC. Two low temperature samples submitted on a pre-access test resulted in recollection under observed collections. One observed collection tested positive for marijuana and the other tested positive for amphetamines. MRO verified that the first sample submitted was a substitute sample. Refusals to test were a result of three individuals providing initial low temperature samples and refusing to remain in the collection facility until a valid sample could be provided under observed conditions. And, four individuals refusing to provide adequate volume samples followed by refusing to remain in the collection facility under observed conditions until a sample with acceptable volume could be obtained. All seven were declared refusals to test.

**COLUMBIA GENERATING STATION
SIX-MONTH PERFORMANCE DATA REPORT
January 1 to June 30, 2003**

FITNESS FOR DUTY PROGRAM SUMMARY

During the reporting period January 1 to June 30, 2003, the number of random tests performed was equivalent to the number required to test at an annual rate equal to at least 50 percent of the unescorted access population. The rate of positive from random testing for this reporting period January 1 to June 30, 2003, was 0.47 percent.

POSITIVE RESULTS

Thirty-one (31) chemical tests yielded a positive result during this reporting period. Calculated from the positives recorded from January 1990 until June 2003, marijuana is the drug of preference, accounting for 62 percent of all the positive results; cocaine is second, yielding 18 percent of the positive results.

MANAGEMENT ACTIONS

Pre-Access

There were twenty-one (21) pre-access positive test results during this reporting period.

Access to Energy Northwest property was denied for seventeen short-term contractor employee applicants, one long-term contractor employee applicant and three-licensee employee applicants who tested positive on pre-access analysis. Management was notified and the individuals' files were annotated of the positive result and management's actions.

Random

There were three (3) random positive test results during this reporting period.

Access was removed for a minimum of fourteen days for two licensee employees and one short-term contractor. The licensee employees and the short-term contractor employee were referred to the appropriate Employee Assistance Program for evaluation and treatment. Management was notified and the individuals' files were annotated of the positive result and management's actions.

The short-term contractor's employment was terminated subsequent to the positive finding and the individual did not return to work or request reinstatement of unescorted access.

The licensee employees did participate in EAP evaluation and met recommended treatment requirements. Both employees have been approved for return to work and have been reinstated for unescorted access and have been enrolled in the follow-up testing program.

Follow Up

There were two (2) positive follow-up test results during this reporting period.

Access was removed for three years for one licensee employee who tested positive on a follow-up breath alcohol test and one short-term contractor employee who tested positive on a follow-up test for amphetamines/d-methamphetamine. The individuals' files were annotated of the positive result and management's actions.

Presently, there are three licensee employees and one long-term contractor employee participating in the follow-up program.

For Cause/ Observable Behavior

There were seven (7) for-cause tests administered due to observable behavior during this reporting period. Five (5) of those for-cause tests for observable behavior tested negative. The observable behavior included odor of alcohol, sleeping or appearing to be asleep during a working tour, inappropriate behavior or comments to security in the security search area, significant human performance error and tampering by adulteration of a sample provided for pre-access testing.

Access was removed for a minimum of fourteen days for one short-term contractor employee who tested positive for alcohol on a test for cause due to observable behavior. The observable behavior was odor of alcohol noticed by a security officer as the contractor was attempting to enter the protected area of Columbia Generating Station. The contractor employee was referred to the contractor's Employee Assistance Program (EAP) for evaluation and treatment. The individual's file was annotated of the positive test result and management action.

Access was denied for a minimum of one year for a temporary licensee employee who tested positive for marijuana on a test for cause due to observable behavior. The observable behavior was submitting a sample for pre-access testing that confirmed as adulterated with oxidants. The individual's file was annotated of the positive test result and management action.

For Cause/Post Accident

There were no positive test results for cause due to post-accident testing during this reporting period. There were four (4) post-accident tests administered for cause post event/accident, all with negative results. No management actions were required. The events/accidents involved vehicle/equipment damage. The accidents included:

- A facilities helper was hauling tumbleweeds to Plant 1 when a metal pipe stanchion holding the load down shifted allowing the pipe to move forward breaking the rear window of the pick-up.
- A laborer injured his hand during fuel movement for new fuel receipt.
- Forklift/truck accident occurred at Building 32. The pick-up sustained damage along the driver's side near and behind the second door. There was no damage to the forklift.
- Vehicle accident off site. An Energy Northwest vehicle struck a privately owned vehicle at a traffic light.

There were no personal injuries involved in any of the vehicle accidents.

Other

One other test was administered as a result of one short-term contractor being granted unescorted access but was not subject to random selection. The individual's name was not entered into the random selection pool in time for that individual to be subject to random selection. On discovery, the individual's name was immediately entered into the random test selection pool, and he was chemically tested under the category other, with negative results. This test was entered into our corrective action process.

Sample Tampering by Substitution/Adulteration

During pre-access testing, a temporary licensee employee provided a sample that tested positive for adulteration with oxidants on an Adulta-Check 6 test strip when screened by the on-site Enzyme Multiplied Immunoassay Technique (EMIT) laboratory. The contracted Health and Human Services (HHS) certified laboratory and the Medical Review Officer subsequently confirmed the oxidant adulteration. The temporary licensee employee did provide a sample under observed conditions for cause that resulted in a confirmed positive test result for marijuana. The temporary licensee applicant was denied access to Energy Northwest property for a minimum of three years in accordance with Energy Northwest policy on tampering.

During pre-access testing two short-term contractor applicants provided cold samples that were determined to be substitutions. One cold sample temperature was measured at 87°F and the other was measured at 92°F. Both resulted in observed collections. The first observed collection resulted in a confirmed positive test result for marijuana. The second observed collection resulted in a confirmed positive test result for amphetamines. Both short-term contractor employee applicants were denied access the Energy Northwest property for a minimum of three years in accordance with Energy Northwest policy on tampering. Both individuals' files were annotated of the positive test result and management action.

Refuse to Test

During pre-access testing six (6) short-term contractor employee applicants and one (1) temporary licensee employee applicant refused to test. The temporary licensee employee applicant and six short-term contractor employee applicants were denied access to Energy Northwest property for a

minimum of three years. The individuals' files were annotated of the refusal to test, management was notified and all were terminated for cause.

Of the seven refusals to test, three were short-term contractor individuals providing low temperature samples on pre-access tests followed by refusing to remain in the collection facility until a valid sample could be provided under observed conditions. Additionally, one temporary licensee employee applicant and three short-term contractor employee applicants refused to provide adequate sample volume during pre-access testing and refused to remain in the collection facility until an adequate volume sample could be provided.

ADMINISTRATIVE ACTIONS

There were no administrative actions taken during this reporting period.

EVENTS REPORTED TO THE NRC

During this reporting period, there were no Fitness For Duty events that were reportable in accordance with 10 CFR 26.73.

PROGRAM WEAKNESSES:

No program weaknesses were identified. Quality services conducted the annual fitness for duty audit during the month of February 2003 and concluded that the FFD program integrity has served as an effective deterrent in establishing and maintaining a drug free environment at Columbia Generating Station.

PROGRAM CHANGES:

Effective January 1, 2003 the fitness for duty program reduced the rate of random testing from 100% to 50% of the average eligible population.

This is in contrast to the increase from 50% to 100% that was effective from January 1 through December 31, 2002. The action to increase the rate of random testing was taken as a result of an increase in random positive test results seen during the 2001 calendar year. At that time a study was conducted to analyze the data and to develop and implement a plan to strengthen the random sampling program. The increased random test rate was considered an enhancement to the random sampling program. Following the calendar year 2002 with 100% random testing and a zero positive random rate it was determined that the fitness for duty program could return to a random testing rate of 50%.

Effective April 7, 2003 Return to Duty Testing was added to the FFD policy as a new category of drug and alcohol testing. Return to Duty testing language was added to the FFD site wide procedure and categorized as, "Return to Duty Testing shall be conducted prior to the reinstatement of the individual's unescorted access or work activities following a violation of the

substance abuse provisions of the FFD policy. An observed chemical test shall be conducted. This test may be conducted for any detectable level of illegal drugs or alcohol.”

Effective April 19, 2003, Steve L. Scammon accepted the position as Resource Protection Manager. Steve has been acting in the position since December 16, 2003.