



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

AUG 25 2004

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

10 CFR 26.71(d)

Gentlemen:

In the Matter of	)	Docket Nos.	50-259	50-390
Tennessee Valley Authority	)		50-260	50-391
			50-296	50-438
			50-327	50-439
			50-328	

FITNESS FOR DUTY (FFD) PROGRAM PERFORMANCE DATA: JANUARY - JUNE 2004

In accordance with 10 CFR 26.71(d), enclosed is TVA's FFD Program Performance Data for the six-month period of January 1 - June 30, 2004. Enclosure 1 contains a discussion of recent FFD Program developments and FFD trends since the last reporting period. Enclosures 2-4 contain the performance data and summary of TVA management actions for TVA's nuclear plant sites (Browns Ferry, Sequoyah, and Watts Bar, respectively). Enclosure 5 consolidates the data for TVA's Nuclear corporate organization (primarily Chattanooga and Knoxville corporate offices) and Bellefonte Nuclear Plant. There were no FFD events reported to the NRC pursuant to 10 CFR 26.73 during the six-month period.

The random testing rate of drug and alcohol use for the workforce that is subject to random testing is in accordance with the requirements prescribed in 10 CFR 26.24 (a) (2).

If you have any questions concerning this information, please telephone Terry Knuettel at (423) 751-6673.

Sincerely,

*Mark J. Burzynski*  
 Mark J. Burzynski  
 Manager  
 Nuclear Licensing

Enclosures  
cc: See page 2

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cc: Continued on page 3

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cc (Enclosures):

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Athens, Alabama 35611-6970

NRC Senior Resident Inspector  
Sequoyah Nuclear Plant  
2600 Igou Ferry Road  
Soddy Daisy, Tennessee 37379-3624

NRC Senior Resident Inspector  
Watts Bar Nuclear Plant  
1260 Nuclear Plant Road  
Spring City, Tennessee 37381

ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY (TVA)  
FITNESS FOR DUTY (FFD) PERFORMANCE DATA  
JANUARY 1 - JUNE 30, 2004

The following summarizes testing results under TVA's FFD Program that occurred during this reporting period:

I. TVA's "Re-screening of Specimens"

Reference: TVA's policy to re-screen specimens with a creatinine level less than 20 mg/dl, which was addressed in the February 28, 1997 FFD Performance Report.

Summary

TVA Nuclear screened 105 specimens at the lower cutoff for marijuana during this reporting period. There were two positive tests identified from this group.

II. TRENDS

The confirmed positive test rate for all categories (pre-employment, pre-access, for-cause, post-accident, random, follow-up, and other) for this reporting period was 0.74 percent (34 positive tests) which is 0.02 percent higher than the last reporting period. The rate of random confirmed positives was 0.29 percent (7 positive tests) which is 0.09 percent higher than the last reporting period. There is no adverse trend for this reporting period, since the percentage increase for these categories (i.e., 0.02 and 0.09) are statistically insignificant.

## ENCLOSURE 2

SUMMARY OF MANAGEMENT ACTIONS FOR  
BROWNS FERRY NUCLEAR PLANT

In the pre-access test category, 17 contract employees (CEs) tested positive. One of the 17 CEs tested positive for two substances. Fourteen of the 17 CEs were denied access, removed from site, returned to the contract company, and restricted from TVA Nuclear (TVAN) work for three years. Three of the 17 CEs were also detected attempting to subvert the Fitness for Duty (FFD) testing process by substitution. These three CEs presented low temperature specimens that tested negative and observed specimens that tested positive. These three CEs were denied access, removed from site, returned to the contract company, and permanently restricted from TVAN work. Seven of the CEs requested that split specimen testing be performed. The split specimen tests reconfirmed the positive test results. Two of the CEs requested an appeal. The appeals upheld the results of the positive tests.

In the for-cause test category, four CEs tested positive. The CEs were removed from site, returned to the contract company, and restricted from TVAN work for three years. Three of the four CE's had their unescorted access revoked. The fourth CE was tested in accordance with TVAN policies and procedures when the odor of alcohol was detected while the CE was on TVA property. The fourth CE did not have unescorted access. Reviews of CEs' work were performed and no deficiencies were identified.

In the random test category, five CEs tested positive. The CEs' unescorted access was revoked. Four of the five CEs were removed from site, returned to the contract company, and restricted from TVAN work for three years. One of the five CEs was also detected attempting to subvert the FFD testing process by substitution. The CE presented a low temperature specimen that tested negative and an observed specimen that tested positive. The CE was removed from site, returned to the contract company, and permanently restricted from TVAN work. Reviews of work were conducted for three of the CEs with no deficiencies identified. A review of work was not conducted for one of the CEs due to the nonsafety sensitive nature of the CE's work. A review of work was not conducted for one of the CEs because the CE was not badged and was still in training. Two of the CEs requested that split specimen testing be performed. The split specimen test reconfirmed the positive test results.

## ENCLOSURE 2

SUMMARY OF MANAGEMENT ACTIONS FOR  
BROWNS FERRY NUCLEAR PLANT

In the follow-up test category, two CEs tested positive. The CEs' unescorted access was revoked. One of the CEs was removed from site, returned to the contract company, and restricted from TVAN work for three years. The other CE was removed from site, returned to the contract company, and permanently restricted from TVAN because of previous positive test results. Reviews of work were conducted for both CEs with no deficiencies identified. One of the CEs requested that a confirmatory blood alcohol test be performed. The blood alcohol test reconfirmed the positive test results. One of the CEs requested an appeal. The appeal upheld the positive test results.

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

TENNESSEE VALLEY AUTHORITY	JUNE 30, 2004
Company	6 Months Ending
BROWNS FERRY NUCLEAR PLANT	
Location	
REBECCA A. STANFIELD	(423) 751-8822
Contact Name	Phone (include area code)
<b>Cut-offs: Screen/Confirmation</b>	
<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/
Amphetamines	/
Cocaine	/
Phencyclidine	/
Opiates	/
Alcohol(%BAC)	/

\*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term *** Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		1,285				2,712	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		83	0	N/A	N/A	1,370	17
For Cause	Post-accident	0	0	N/A	N/A	1	0
	Observed behavior	3	0	N/A	N/A	14	4
Random		394	0	N/A	N/A	978	5
Follow-up		15	0	N/A	N/A	17	2
Other **		0	0	N/A	N/A	1	0
Total		495	0	N/A	N/A	2,381	28

\*\*The other test category includes: return to work-(1).

\*\*\*Both long-term and short-term contractors are included in the "Short-Term Contractor Personnel" category.

## Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	
Licensee Employees	0	0	0	0	0	0	0	0	0	0	0	
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	
Short-Term Contractors	14	10	0	1	0	4	0	0	0	0	0	
Total	14	10	0	1	0	4	0	0	0	0	0	29

## Cutoff Levels of Additional Drugs

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Propoxyphene	300	300



ENCLOSURE 3

SUMMARY OF MANAGEMENT ACTIONS FOR  
SEQUOYAH NUCLEAR PLANT

In the pre-access test category, one contract employee (CE) tested positive. The CE was denied access, removed from site, returned to the contract company, and restricted from TVA Nuclear (TVAN) work for three years. The CE requested that split specimen testing be performed. The split specimen test reconfirmed the positive test results.

In the for-cause test category, two CEs tested positive. The CEs' unescorted access was revoked. One of the CEs was removed from site, returned to the contract company, and restricted from TVAN work for three years. The other CE was also detected attempting to subvert the Fitness for Duty testing process by substitution. This CE presented a low temperature specimen that tested negative and an observed specimen that tested positive. This CE was denied access, removed from site, returned to the contract company, and permanently restricted from TVAN work. A review of work was conducted for one of the CEs with no deficiencies identified. A review of work was not conducted for the other CE due to the nonsafety sensitive nature of the CE's work.

In the random test category, one CE and one licensee employee (LE) tested positive. The CE's and LE's unescorted access was revoked. The CE was removed from site, returned to the contract company, and restricted from TVAN work for three years. The LE was suspended from work for 14 days, referred to the Employee Assistance Program, returned to work during this reporting period, and placed in the follow-up alcohol and drug testing program. Reviews of work were conducted for the CE and LE with no deficiencies identified.

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

TENNESSEE VALLEY AUTHORITY		JUNE 30, 2004	
Company		6 Months Ending	
SEQUOYAH NUCLEAR PLANT			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
<b>Cut-offs: Screen/Confirmation</b>		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol(%BAC)	/

\*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term *** Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		1,307		N/A		408	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		73	0	N/A	N/A	301	1
For Cause	Post-accident	1	0	N/A	N/A	0	0
	Observed behavior	3	0	N/A	N/A	2	2
Random		345	1	N/A	N/A	138	1
Follow-up		2	0	N/A	N/A	0	0
Other **		1	0	N/A	N/A	0	0
Total		425	1	N/A	N/A	441	4

\*\*The other test category includes: return to work (1).

\*\*\*Both long-term and short-term contractors are included in the "Short-Term Contractor Personnel" category.

## Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	
Licensee Employees	0	1	0	0	0	0	0	0	0	0	0	
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	
Short-Term Contractors	1	0	0	1	0	1	0	0	1	0	0	
Total	1	1	0	1	0	1	0	0	1	0	0	5

## Cutoff Levels of Additional Drugs

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Propoxyphene	300	300

ENCLOSURE 4

SUMMARY OF MANAGEMENT ACTIONS FOR  
WATTS BAR NUCLEAR PLANT

There were no positive tests for Watts Bar Nuclear Plant during this reporting period.

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

TENNESSEE VALLEY AUTHORITY	JUNE 30, 2004
Company	6 Months Ending
WATTS BAR NUCLEAR PLANT	
Location	
REBECCA A. STANFIELD	(423) 751-8822
Contact Name	Phone (include area code)
<b>Cut-offs: Screen/Confirmation</b>	
<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/
Amphetamines	/
Cocaine	/
Phencyclidine	/
Opiates	/
Alcohol(%BAC)	/

\*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term *** Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		949		N/A		358	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		41	0	N/A	N/A	181	0
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	0	0
Random		243	0	N/A	N/A	112	0
Follow-up		4	0	N/A	N/A	0	0
Other**		0	0	N/A	N/A	0	0
Total		288	0	N/A	N/A	293	0

\*\*There were no tests in the "other" test category during this reporting period.

\*\*\* Both long-term and short-term contractors are included in the "Short-Term Contractor Personnel" category.

**Breakdown of Confirmed Positive Tests for Specific Substances**

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to test	1	2	3	4
Licensee Employees	0	0	0	0	0	0	0	0	0	0	0
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
Short-Term Contractors	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0

**Cutoff Levels of Additional Drugs**

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Propoxyphene	300	300

ENCLOSURE 5

SUMMARY OF MANAGEMENT ACTIONS FOR  
CORPORATE TVA NUCLEAR (TVAN) OFFICES  
AND BELLEFONTE NUCLEAR PLANT

In the **follow-up** test category, one licensee supervisor (LS) tested positive. The LS was not badged nor assigned other duties within the scope of 10 CFR Part 26. The LS was removed from site (Corporate), terminated, and permanently restricted from TVAN work due to previous positive test results. The LS requested that a split specimen test be performed. The split specimen test reconfirmed the positive test results.

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

TENNESSEE VALLEY AUTHORITY		JUNE 30, 2004	
Company		6 Months Ending	
CORPORATE OFFICES (CHATTANOOGA, KNOXVILLE, BELLEFONTE, AND OTHER)			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
<b>Cut-offs: Screen/Confirmation</b>		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol(%BAC)	/

\*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term **** Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access **		N/A		N/A		N/A	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		N/A	N/A	N/A	N/A	N/A	N/A
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	0	0
Random		187	0	N/A	N/A	26	0
Follow-up		7	1	N/A	N/A	0	0
Other ***		16	0	N/A	N/A	1	0
Total		210	1	N/A	N/A	27	0

\*\* Persons assigned to the corporate organization or Bellefonte, but with unescorted access at a TVAN site, are included in the average for the site or sites where they hold the unescorted access authorization.

\*\*\*The other test category includes: employment (2)-TVAN; assignment to emergency response duties (6)-TVAN; program integrity clearance (8)-TVAN, (1)-contract.

\*\*\*\*Both long-term and short-term contractors are included in the "Short-Term Contractor Personnel" category.



## Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to test	1	2	3	4	
Licensee Employees	0	1	0	0	0	0	0	0	0	0	0	
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	
Short-Term Contractors	0	0	0	0	0	0	0	0	0	0	0	
Total	0	1	0	0	0	0	0	0	0	0	0	1

## Cutoff Levels of Additional Drugs

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Propoxyphene	300	300