



**Pacific Gas and  
Electric Company**

**David H. Oatley**  
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PG&E Letter DCL-04-106

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

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2

Semi-Annual Fitness for Duty Performance Report for the Period of January through  
June 2004

Dear Commissioners and Staff:

Pursuant to 10 CFR 26.71(d), Pacific Gas & Electric Company (PG&E) is submitting the enclosed Fitness for Duty (FFD) Performance Report for the period of January 1, through June 30, 2004. The performance data have been compiled on the standard forms developed by the Nuclear Energy Institute and are provided in Enclosure 1. As noted in Enclosure 1, individuals being screened for initial unescorted security access (pre-employment testing 60 days prior to being cleared) are tested at lower cut-off levels for marijuana and amphetamines, and two additional substances. This testing is reported under the pre-access category and is conducted in accordance with 10 CFR 26.

Statistical analysis of the data was conducted and the results are provided in Enclosure 2.

Enclosure 3 provides a summary of program activities for the reporting period, including a minor correction to the Diablo Canyon Power Plant Semi-Annual Fitness For Duty Program report for the period of July through December 2003, PG&E Letter DCL-04-014.

During this period, no licensed operators or supervisors tested positive. There were no significant FFD event reports made during the period.

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If you have any questions regarding the enclosed information or other FFD Program activities, please contact William F. Ryan, Access/FFD Supervisor, at (805) 545-3329.

Sincerely,

A handwritten signature in black ink, appearing to read 'D H Oatley'.

David H. Oatley  
*Vice President and General Manager*

swh/R0256126

Enclosures

cc: Diablo Distribution  
cc/enc: Richard E. Enkeboll, NEI  
Bruce S. Mallett  
David L. Proulx  
Girija S. Shukla

**FITNESS FOR DUTY PERFORMANCE DATA  
JANUARY THROUGH JUNE 2004**

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

<u><b>PACIFIC GAS AND ELECTRIC COMPANY</b></u>	<u><b>June 30 2004</b></u>
Company	6 Months Ending
<u><b>DIABLO CANYON POWER PLANT</b></u>	
Location	
<u><b>WILLIAM F. RYAN, ACCESS/FITNESS FOR DUTY SUPERVISOR</b></u>	<u><b>(805) 545-3329</b></u>
Contact Name	Phone (including area code)
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10 CFR 26	
Pre-employment Screening	
Marijuana    20 / 10	Amphetamines    300 / 250
Cocaine       300 / 150	Phencyclidine    25 / 25
Opiates       300 / 300	Alcohol (% BAC)    0.04%
	Barbiturates                      300 / 250
	Benzodiazepines                300 / 250

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access: 2102		1558		544			
Pre-Access		161	0	46	1	1023	20
For Cause	Post-accident	0	0	0	0	0	0
	Observed behavior	3	0	0	0	4	0
Random		385	0	71	1	80	0
Follow-up		45	0	3	0	65	0
Other**		12	0	14	0	18	0
<b>Total</b>		<b>606</b>	<b>0</b>	<b>134</b>	<b>2</b>	<b>1190</b>	<b>20</b>

\* Includes long- and short term contractors; differentiation between the two is not obtainable  
 \*\* Testing of FFD Administrative Staff

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

	<b>Marijuana</b>	<b>Cocaine</b>	<b>Opiates</b>	<b>Amphetamines</b>	<b>Phencyclidine</b>	<b>Alcohol</b>	<b>Refusal to Test</b>	<b>Benzo-diazepines</b>
Licensee Employees								
Long-Term Contractors	2							
Short Term Contractors	10	1		7		1	4	1
Total	12	1		7		1	4	1

**STATISTICAL ANALYSIS FOR REPORTING PERIOD  
JANUARY THROUGH JUNE 2004**

Analysis of the data indicates that 25.5 percent of the average eligible population was randomly tested during the period January through June 2004.

The overall positive test rate for this period was 1.14 percent. Pre-access tests for short-term contractor personnel accounted for 91 percent of all positive tests. The large number of positive tests recorded for short-term contractor personnel in the pre-access testing category is attributable to the 1R12 refueling outage.

PG&E submitted blind performance specimens in accordance with 10 CFR 26, Appendix A, Section 2.8 (e)(2), requirements. There were no reportable events.

## **FITNESS FOR DUTY PROGRAM ACTIVITY REPORT**

### **Activity 1: Alcohol Discovered in the Plant Owner Controlled Area**

Beer was found in the plant owner controlled area, outside the protected area, during this reporting period. No individual was in the area at the time of discovery. The PG&E Corporate Security Investigator followed up on the matter by interviewing personnel who may have been in the area where the beer was found. Five days after the beer had been discovered, a contract worker admitted to his supervisor that the beer discovered in the owner controlled area was his. The contract worker's unescorted access was suspended pending further review.

The contract worker admitted to bringing the beer onto the site and to drinking 2 cans of beer by himself. Given that the individual had violated site policies regarding bringing alcohol on site and drinking the beer on site, his unescorted access was revoked. A work review was conducted for the individual. It was determined that the individual was not responsible for any work that could have adversely affected plant operations.

### **Activity 2: Correction to the Diablo Canyon Power Plant Semi-Annual Fitness For Duty Program report for the period of July through December 2003**

A correction to the Diablo Canyon Power Plant Semi-Annual Fitness For Duty Program report for the period of July through December 2003 was recently noted. On the performance data sheet in the Testing Results category of "For-Cause," all the for-cause tests administered were listed under the sub-category of "observed behavior" and the for-cause test for a licensee employee should have been listed under the sub-category to indicate it was a "post-accident" for-cause test.

### **Activity 3: Supervisor Failed to Implement the Fitness For Duty Program For-Cause Testing Procedure**

During this reporting period, it was noted that a supervisor did not effectively implement the Fitness For Duty Program For-Cause Testing Procedure for an employee who displayed problem behavior. This issue was entered into the plant corrective action program.

Security personnel had noted that an employee, while entering the site to begin work, was upset and somewhat uncooperative while going through site security checkpoints. The security supervisor on duty placed the employee's unescorted access on temporary hold until the employee's supervisor could review the matter. The supervisor met with the employee and decided to send the employee home for the day. Later, the supervisor reported that the employee had smelled of alcohol, but that the supervisor did not feel the employee was impaired.

Security personnel kept the employee's unescorted access on hold. Upon learning of the incident the following day, the Fitness For Duty Supervisor, referred the employee to the Medical Review Officer for evaluation prior to restoring the individual's unescorted access. The medical evaluation showed that the employee had diabetes and this condition may have contributed to the alcohol odor the supervisor noted. The MRO ordered a for- cause test for the individual that showed negative results. The employee subsequently returned to duty and is participating in the Fitness For Duty Follow Up Testing and Monitoring Program.

The supervisor was required to review the Fitness For Duty Program For-Cause Testing Procedure with his manager and received counseling on management expectations for use of the procedure. In addition, the supervisor was required to attend and complete the initial Fitness For Duty Training class.

Information about this event was distributed via e-mail to all supervisors and managers. In addition, the supervisors and managers who received the e-mail were required to review the Fitness For Duty Program For-Cause Testing Procedure and confirm by return e-mail that they had read and understood the testing requirements.