



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

February 24, 2005

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: JULY - DECEMBER 2004

In accordance with 10 CFR 26.71(d), enclosed is TVA's FFD Program Performance Data for the six-month period of July 1 - December 31, 2004. Enclosure 1 summarizes the testing results under TVA's FFD Program that occurred during this 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 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,

Fredrick C. Mashburn
Senior Program Manager
Licensing

Enclosures
cc: See page 2

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

ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY (TVA)
FITNESS FOR DUTY (FFD) PERFORMANCE DATA
JULY 1 - DECEMBER 31, 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

During this reporting period, TVA Nuclear screened 130 specimens at the lower cutoff for marijuana. There were 2 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 0.72 percent (35 positive tests) which is 0.02 percent lower than the last reporting period. The rate of random confirmed positives was 0.37 percent (9 positive tests) which is 0.08 percent higher than the last reporting period. There is no adverse trend for this reporting period since the percentage increase for the random category (i.e., 0.08) is statistically insignificant.

ENCLOSURE 2

SUMMARY OF MANAGEMENT ACTIONS FOR
BROWNS FERRY NUCLEAR PLANT

In the pre-access test category, six contract employees (CEs) tested positive. The six 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 CEs requested that split specimen testing be performed. The split specimen tests reconfirmed the positive test results.

In the for-cause test category, three CEs tested positive. One of the CEs tested positive for two substances. The CEs' unescorted access was revoked. The CEs were removed from site, returned to the contract company, and restricted from TVAN work for three years. One of the CEs requested that split specimen testing be performed. The split specimen tests reconfirmed the positive test results. Review of the CEs' work did not identify any deficiencies.

In the random test category, eight CEs tested positive and one CE was detected attempting to subvert the fitness for duty testing process by substitution (i.e., laboratory testing indicated that the specimen was not consistent with normal human urine). Due to the attempted specimen substitution, the CE's test results could not be reported as negative or positive. The CEs' unescorted access was revoked. The eight CEs with positive test results were removed from site, returned to the contract company, and restricted from TVAN work for three years. The CE attempting to subvert the fitness for duty testing process was removed from site, returned to the contract company, and permanently restricted from TVAN work. Four of the eight CEs with positive test results requested that split specimen testing be performed. The split specimen tests reconfirmed the positive test results. The CE attempting to subvert the fitness for duty testing process requested that split specimen testing be performed. The split specimen tests reconfirmed the original substituted result. The CE attempting to subvert the fitness for duty testing process requested an appeal. The appeal upheld the results of the substituted test. Review of the nine CEs' work did not identify any deficiencies.

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

TENNESSEE VALLEY AUTHORITY	DECEMBER 31, 2004
Company	6 Months Ending
BROWNS FERRY NUCLEAR PLANT	
Location	
REBECCA A. STANFIELD	(423) 751-8822
Contact Name	Phone (include area code)
Cut-offs: Screen/Confirmation	
<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		1,283				3,008	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		80	0	N/A	N/A	950	6
For Cause	Post-accident	1	0	N/A	N/A	1	0
	Observed behavior	0	0	N/A	N/A	14	3
Random		378	0	N/A	N/A	999	8
Follow-up		14	0	N/A	N/A	15	0
Other **		1	0	N/A	N/A	0	0
Total		474	0	N/A	N/A	1,979	17

**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	8	5	0	1	0	2	0	0	1	0	1	
Total	8	5	0	1	0	2	0	0	1	0	1	18

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, nine contract employees (CEs) tested positive and one CE was detected attempting to subvert the fitness for duty testing process by substitution (i.e., specimen not consistent with normal human urine). Due to the attempted specimen substitution, the CE's test results could not be reported as negative or positive. The CE's were denied access. One of the nine CE's with positive test results was badged as a reinstatement pending drug test results, and the unescorted access was revoked. The nine CE's with positive test results were removed from site, returned to the contract company, and restricted from TVAN work for three years. The CE attempting to subvert the fitness for duty testing process was removed from site, returned to the contract company, and permanently restricted from TVAN work. Four of the nine CE's with positive test results requested that split specimen testing be performed. The split specimen tests reconfirmed the positive test results. One of the nine CE's with positive test results requested that a confirmatory blood alcohol test be performed. The blood alcohol test reconfirmed the positive test results. A review of work was not performed for the CE for whom unescorted access was revoked because the CE was still in training and had not performed safety-sensitive work.

In the **for-cause** test category, two CE's tested positive. One of the CE's unescorted access was revoked. The other CE did not have unescorted access but was tested in accordance with TVAN policies and procedures when the odor of alcohol was detected. The CE's were removed from site, returned to the contract company, and restricted from TVAN work for three years. One of the CE's requested that split specimen testing be performed. The split specimen test reconfirmed the positive test results. One of the CE's requested that a confirmatory blood alcohol test be performed. The blood alcohol test reconfirmed the positive test results. A review of work for the CE for whom unescorted access was revoked did not identify any deficiencies. One of the CE's requested an appeal; however, the results of the appeal were not received during this reporting period.

In the **random** test category, one licensee employee (LE) tested positive. The LE's unescorted access was revoked. The LE was suspended from work for 14 days and referred to the Employee Assistance Program. The LE did not return to work during this reporting period. A review of the LE's work did not identify any deficiencies.

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

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 2004	
Company		6 Months Ending	
SEQUOYAH NUCLEAR PLANT			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
Cut-offs: Screen/Confirmation		<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	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access		1,329		N/A		650	
Pre-Access		65	0	N/A	N/A	966	9
For Cause	Post-accident	0	0	N/A	N/A	6	0
	Observed behavior	3	0	N/A	N/A	6	2
Random		313	1	N/A	N/A	179	0
Follow-up		6	0	N/A	N/A	8	0
Other **		0	0	N/A	N/A	1	0
Total		387	1	N/A	N/A	1,166	11

**The other test category includes: program integrity clearance (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	1	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	*7	2	0	0	0	2	0	0	0	0	0	
Total	7	2	0	0	0	3	0	0	0	0	0	12

* One specimen from this category tested negative at the 50 ng/ml cutoff limit, but positive using the 20 ng/ml cutoff limit.

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

In the **pre-access** test category, six contract employees (CEs) tested positive. Two of the CEs were badged as reinstatements pending drug test results and unescorted access was revoked. The six CEs were removed from site, returned to the contract company, and restricted from TVAN work for three years. Three of the CEs requested that split specimen be performed. The split specimen tests reconfirmed the positive test results. One of the CEs requested an appeal. The appeal upheld the positive test results. A review of work for one of the CEs for whom unescorted access was revoked did not identify any deficiencies. A review of work was not performed for the other CE for whom unescorted access was revoked because the CE was still in training and had not performed any safety-sensitive work.

In the **random** test category, one CE was detected attempting to subvert the fitness for duty testing process by adulteration. Due to the adulteration, the CE's test results could not be reported as negative or positive. The CE's unescorted access was revoked. The CE was removed from site, returned to the contract company, and permanently restricted from TVAN work. The CE requested an appeal. The appeal upheld the adulterated specimen results. A review of the CE's work did not identify any deficiencies.

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

TENNESSEE VALLEY AUTHORITY	DECEMBER 31, 2004
Company	6 Months Ending
WATTS BAR NUCLEAR PLANT	
Location	
REBECCA A. STANFIELD	(423) 751-8822
Contact Name	Phone (include area code)
Cut-offs: Screen/Confirmation	
<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	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access		926		N/A		459	
Pre-Access		28	0	N/A	N/A	269	6
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	3	0	N/A	N/A	3	0
Random		200	0	N/A	N/A	135	0
Follow-up		2	0	N/A	N/A	0	0
Other**		0	0	N/A	N/A	0	0
Total		233	0	N/A	N/A	407	6

**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.

REV. 1/92

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	*4	0	0	1	0	1	0	0	0	0	0	
Total	4	0	0	1	0	1	0	0	0	0	0	6

* One specimen from this category tested negative at the 50 ng/ml cutoff limit, but positive using the 20 ng/ml cutoff limit.

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 [BLN]

There were no positive tests in the Corporate TVAN Offices or BLN during this reporting period.

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

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 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)	
Cut-offs: Screen/Confirmation		<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	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		178	0	N/A	N/A	21	0
Follow-up		5	0	N/A	N/A	0	0
Other ***		9	0	N/A	N/A	3	0
Total		192	0	N/A	N/A	24	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 (1)-TVAN, (3)-contract; assignment to emergency response duties (1)-TVAN; program integrity clearance (4)-TVAN; transfer (3)-TVAN.

****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	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