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August 18, 2005

Docket Nos.: 50-321 50-348 50-424 50-366 50-364 50-425 NL-05-1442

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

> Edwin I. Hatch Nuclear Plant Joseph M. Farley Nuclear Plant Vogtle Electric Generating Plant Fitness For Duty Performance Data

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC) hereby submits the Fitness For Duty (FFD) Performance Data for the six-month reporting period, January 2005 through June 2005, as required by 10 CFR 26.71(d).

The data reflected in this report covers the employees specified in the respective enclosures. In January 2005, Southern Nuclear implemented two changes to the FFD program. As proposed in the draft FFD rule, during breath analysis, a Breath Alcohol Concentration (BAC) is considered positive if any of the following criteria are met:

- The confirmed result is 0.04% BAC or greater at the time of the test;
- The confirmed result is 0.03% BAC or greater and the individual has been at work for at least one hour;
- The confirmed result is 0.02% BAC or greater and the individual has been at work for at least two hours.

Also, all for-cause, follow-up, and suspect specimens as determined by the Medical Review Officer (MRO) (i.e., positive nitrite, low temperature or specific gravity, and any witnessed collections) are now tested at the Health and Human Services (HHS) laboratory at the Limits of Detection (LOD), rather than at the regular screening and confirmation cutoff levels. U. S. Nuclear Regulatory Commission NL-05-1442 Page 2

The LOD screening and confirmation cutoffs are listed in the table below:

	Screening/Confirmation	Screening/Confirmation
	(Regular levels)	(LOD levels)
Marijuana	50 / 15 ng/ml	20 / 1.5 ng/ml
Cocaine	300 / 150 ng/ml	150 / 60 ng/ml
Opiate/Morphine	300 / 300 ng/ml	300 / 150 ng/ml
Opiate/Codeine	300 / 300 ng/ml	300 / 150 ng/ml
Phencyclidine	25 / 25 ng/ml	20 / 10 ng/ml
Amphetamine	1,000 / 500 ng/ml	300 / 100 ng/ml
Methamphetamine	1,000 / 500 ng/ml	300 / 100 ng/ml

Accordingly, the data reported indicates whether the individual tested positive at the regular cut-off levels or at the lowest LOD.

This letter contains no NRC commitments. If you have any questions, please advise.

Sincerely,

D. E. Grissette

DEG/JMG/daj

Enclosures:

- 1. Edwin I. Hatch Nuclear Plant FFD Performance Data
- 2. Joseph M. Farley Nuclear Plant FFD Performance Data
- 3. Vogtle Electric Generating Plant FFD Performance Data
- 4. SNC Corporate Headquarters FFD Performance Data
- cc: <u>Southern Nuclear Operating Company</u>

Mr. J. T. Gasser, Executive Vice President Mr. L. M. Stinson, Vice President – Plant Farley Mr. H. L. Sumner, Jr., Vice President – Plant Hatch Mr. J. R. Johnson, General Manager – Plant Farley Mr. G. R. Frederick, General Manager – Plant Hatch Mr. T. E. Tynan, General Manager – Plant Vogtle RType: CFA04.054; CHA02.004; CVC7000; LC# 14319

<u>U. S. Nuclear Regulatory Commission</u> Dr. W. D. Travers, Regional Administrator Mr. R. E. Martin, NRR Project Manager – Farley Mr. C. Gratton, NRR Project Manager – Hatch Mr. C. Gratton, NRR Project Manager – Vogtle Mr. C. A. Patterson, Senior Resident Inspector – Farley Mr. D. S. Simpkins, Senior Resident Inspector – Hatch Mr. G. J. McCoy, Senior Resident Inspector – Vogtle

The data generated under the Fitness for Duty (FFD) program from January 2005 through June 2005 has been reviewed and analyzed. The data reflected in this report covers workers, including contract personnel, of the Edwin I. Hatch Nuclear Plant.

The random pool contains not only those badged for unescorted access, but also those employees who may, in an emergency condition, be called upon to work at the site and may require unescorted access. Contractors without approved programs are included in the testing pool while on site. Testing during this time period was performed on a nominal weekly basis to include swing shifts, weekends, and holidays. All for-cause, follow-up, and suspect specimens are tested at the Limits of Detection (LOD) as noted. During this testing period, the rate of testing was equal to 50% yearly of the total population. Weekly quality control checks of the FFD random pool revealed, at most, minor discrepancies during this reporting period.

In summarizing management actions associated with the FFD program, it should be emphasized that the incidence of confirming positive tests was very low. Consequently, management actions relative to determination of FFD have been limited. The following actions were taken relative to the confirmed positive tests during this reporting period:

Short-term Contractors – Two individuals screened as positive and were denied access. One individual being escorted after a pre-access test was performed was collected as a random. Both specimens were confirmed positive and access was terminated. Two other individuals tested positive at LOD on follow-up tests and access was terminated.

Long-term Contractors – None

Employees - None

Employees who report a substance abuse-related arrest or any custodial arrest submit to FFD testing and are referred for an Employee Assistance Program evaluation by a mental health professional to determine if there is a substance abuse or other problem. For this reporting period, there was one employee referred for evaluation.

Company:	6 Months Ending	
Southern Nuclea	r Operating Company	06/30/2005
Location		
E. I. Hatch Nucle	ear Plant, Baxley, GA	
Contact Name		Phone
April Brockson		205-992-5270
Cutoffs: Screen/Conf Marijuana 50 / 15	irmation (ng/ml) X Appendix A to	10CFR 26 except for
Cutoffs: Screen/Conf	irmation (ng/ml) 🛛 Limits of Detec	tion (LOD)
Marijuana 20/1.5	Amphetamines 300 / 100	
Cocaine 150 / 60	Phencyclidine 20 / 10	
Opiates 300 / 150		if at work for at least 2 hours if at work for at least 1 hour

Testing Results		Licensee Employees		Long Term Contractor Personnel		Short Term Contractor Personnel	
-	Number with ed access	8	38	ç	95	1	94
Categorie			# Positive	# Tested	# Positive	# Tested	# Positive
	Pre-Access		0	0	0	844	3
For Cause	Post accident	10	0	0	0	0	0
	Observed Behavior	4	0	0	0	2	0
Random		212	0	17	0	60	1
Follow-u	Follow-up		0	3	0	22	2 *2
Other: Safety & Health, Re- test, Return to work		20	0	1	0	5	0
Total	f tasts in this cator	319	0	21	0	933	6

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test
Licensee Employees	0	0	0	0	0	0	0
Long-Term Contractors	0	0	0	0	0	0	0
Short-Term Contractors	5 *2	1	0	3	0	0	0
Total	5	1	0	3	0	0	0

The data generated under the Fitness for Duty (FFD) program from January 2005 through June 2005 has been reviewed and analyzed. The data reflected in this report covers workers, including contract personnel, of the Joseph M. Farley Nuclear Plant.

The random pool contains not only those badged for unescorted access, but also those employees who may, in an emergency condition, be called upon to work at the site and may require unescorted access. Contractors without approved programs are included in the testing pool while on site. Testing during this time period was performed on a nominal weekly basis to include swing shifts, weekends, and holidays. All for-cause, follow-up, and suspect specimens are tested at the Limits of Detection (LOD) as noted. During this testing period, the rate of testing was equal to 50% yearly of the total population. Weekly quality control checks of the FFD random pool revealed, at most, minor discrepancies during this reporting period.

In summarizing management actions associated with the FFD program, it should be emphasized that the incidence of confirming positive tests was very low. Consequently, management actions relative to determination of FFD have been limited. The following actions were taken relative to the confirmed positive tests during this reporting period:

Short-term Contractors – One individual screened as positive and was denied access. One other individual tested positive on a random and access was terminated.

Long-term Contractors – None

Employees – One employee tested positive on a random. He was placed in the follow-up pool, refused to provide a follow-up specimen in accordance with 10 CFR 26 (dilute), and had a positive witnessed re-test at LOD. He was subsequently terminated. One other employee tested positive on a follow-up test at LOD and was terminated.

Employees who report a substance abuse-related arrest or any custodial arrest submit to FFD testing and are referred for an Employee Assistance Program evaluation by a mental health professional to determine if there is a substance abuse or other problem. For this reporting period, there were no employees referred for evaluation.

Company:	6 Months Ending
Southern Nuclear Operating Company	y 06/30/2005
Location	
Joseph M. Farley Nuclear Plant	
Contact Name	Phone
April Brockson	205-992-5270
Cutoffs: Screen/Confirmation (ng/ml) 🛛 Ap	pendix A to 10CFR 26 except for:
Marijuana 50/15	
Cutoffs: Screen/Confirmation (ng/ml) 🛛 Lin	nits of Detection (LOD)
Marijuana 20 / 1.5 Amphetamines 30	00 / 100
Cocaine 150 / 60 Phencyclidine 2	0 / 10
Opiates 300 / 150 Alcohol (% BAC)	>/= 0.02% if at work for at least 2 hours >/= 0.03% if at work for at least 1 hour

Testing Results		Licensee Employees		Cont	Term ractor onnel	Short Term Contractor Personnel		
	erage Number h unescorted ess	846		,, ,	73	132		
0-4		# Tested	# Desitions	#	# Desitions	# Tracked	# Desitive	
	egories	Tested	Positive	Tested	Positive	Tested	Positive	
Pre	-Access	40	_0	0	0	142	1	
For Cause	Post accident	4	0	0	0	0	0	
*	Observed Behavior	4	0	0	0	0	0	
Ra	ndom	226	1	14	0	25	1	
Fol	low-up	17	2 *1	0	0	2	0	
Other: Safety & Health, Re-test, Return to work		17	1 *1	0	0	0	0	
Tot	al	308	4	14	0	169	2	

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test]
Licensee Employees	3*2	0	0	0	0	0	1	
Long-Term Contractors	0	0	0	0	0	0	0	
Short-Term Contractors	0	2	0	0	0	0	0	
Total	3	2	0	0	0	0	1	6

The data generated under the Fitness for Duty (FFD) program from January 2005 through June 2005 has been reviewed and analyzed. The data reflected in this report covers workers, including contract personnel, of the Vogtle Electric Generating Plant.

The random pool contains not only those badged for unescorted access, but also those employees who may, in an emergency condition, be called upon to work at the site and may require unescorted access. Contractors without approved programs are included in the testing pool while on site. Testing during this time period was performed on a nominal weekly basis to include swing shifts, weekends, and holidays. All for-cause, follow-up, and suspect specimens are tested at the Limits of Detection (LOD) as noted. During this testing period, the rate of testing was equal to 50% yearly of the total population. Weekly quality control checks of the FFD random pool revealed, at most, minor discrepancies during this reporting period.

In summarizing management actions associated with the FFD program, it should be emphasized that the incidence of confirming positive tests was very low. Consequently, management actions relative to determination of FFD have been limited. The following actions were taken relative to the confirmed positive tests during this reporting period:

Short-term Contractors - Ten individuals screened as positive and were denied access.

Long-term Contractors – None

Employees – None

Employees who report a substance abuse-related arrest or any custodial arrest submit to FFD testing and are referred for an Employee Assistance Program evaluation by a mental health professional to determine if there is a substance abuse or other problem. For this reporting period, there was one employee referred for evaluation.

Company:	6 Months Ending	
Southern Nuclear	06/30/2005	
Location		
Vogtle Electric Ge	nerating Plant, Waynesboro, (GA
Contact Name		Phone
April Brockson		205-992-5270
Cutoffs: Screen/Confirm Marijuana 50 / 15	nation (ng/ml) 🛛 Appendix A to 10	CFR 26 except for
Cutoffs: Screen/Confirm	nation (ng/ml) 🛛 Limits of Detection	on (LOD)
Marijuana 20 / 1.5	Amphetamines 300 / 100	
Cocaine 150 / 60	Phencyclidine 20/10	
Opiates 300 / 150	Alcohol (% BAC) >/= 0.02% if >/= 0.03% if	at work for at least 2 hours at work for at least 1 hour

Testing Results		Licensee Employees		Cont	Term ractor onnel	Short Term Contractor Personnel		
	erage Number h unescorted ess	857		1	15	163		
		#	#	#	#	#	#	
Cat	egories	Tested	Positive	Tested	Positive	Tested	Positive	
Pre	-Access	45	0	0	0	654	10	
For Cause	Post accident	2	0	0	0	3	0	
*	Observed Behavior	5	0	_0	0	1	0	
Ra	ndom	209	0	34	0	42	0	
Fol	low-up	58	0	_0	0	32	0	
Other: Safety & Health, Re-test, Return to work		20	0	4	0	19	0	
Tot	al	339	0	38	0	751	10	

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test]
Licensee Employees	0	0	0	0	0	0	0]
Long-Term Contractors	0	0	0	0	0	0	0]
Short-Term Contractors	6	2	1	0	0	2	0]
Total	6	2	1	0	0	2	0	11

The data generated under the Fitness for Duty (FFD) program from January 2005 through June 2005 has been reviewed and analyzed. The data reflected in this report covers workers, including contract personnel, at the Southern Nuclear Operating Company Corporate Headquarters in Birmingham, Alabama.

The random pool contains not only those badged for unescorted access at a nuclear site, but also those employees who may, in an emergency condition, be called upon to work at any of the SNC sites and may require unescorted access. Contractors without approved programs are included in the testing pool. Testing during this time period was performed on a nominal weekly basis. All for-cause, follow-up, and suspect specimens are tested at the Limits of Detection (LOD) as noted. During this testing period, the rate of testing was equal to 50% yearly of the total population. Weekly quality control checks of the FFD random pool revealed, at most, minor discrepancies during this reporting period.

In summarizing management actions associated with the FFD program, it should be emphasized that the incidence of confirming positive tests was very low. Consequently, management actions relative to determination of FFD have been limited. The following actions were taken relative to the confirmed positive tests during this reporting period:

Short-term Contractors – None

Long-term Contractors – None

Employees - None

Employees who report a substance abuse-related arrest or any custodial arrest submit to FFD testing and are referred for an Employee Assistance Program evaluation by a mental health professional to determine if there is a substance abuse or other problem. For this reporting period, there were no employees referred for evaluation.

Company:	6 Months Ending
Southern Nuclear Operating Company	06/30/2005
Location	
SNC Corporate Headquarters	
Contact Name	Phone
April Brockson	205-992-5270
Cutoffs: Screen/Confirmation (ng/ml) Appendix Marijuana 50 / 15	A to 10CFR 26 except for
Cutoffs: Screen/Confirmation (ng/ml) 🛛 Limits of	Detection (LOD)
Marijuana 20/1.5 Amphetamines 300/10	0
Cocaine150 / 60Phencyclidine20 / 10	
• • •	.02% if at work for at least 2 hours 03% if at work for at least 1 hour

Testing Results		Licensee Employees		Cont	Term ractor onnel	Short Term Contractor Personnel		
1	erage Number h unescorted ess	551		3	33	56		
		#	#	#	#	#	#	
Cat	egories	Tested	Positive	Tested	Positive	Tested	Positive	
Pre	-Access	51	0	0	0	11	0	
For Cause	Post accident	0	0	0	0	0	0	
×	Observed Behavior	1	0	0	0	0	0	
Rar	ndom	152	0	6	0	17	0	
Fol	low-up	4	_0	0	0	0	0	
Other: Safety & Health, Re-test, Return to work		14	0	0	0	1	0	
Tot	al	222	0	6	0	29	0	

Breakdown of Confirmed Positive Tests for Specific Substances

_	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test	
Licensee Employees								1
	0	0	0	0	0	0	0	
Long-Term								
Contractors	0	0	0	0	0	0	0	
Short-Term								
Contractors	0	0	0	0	0	0	0	
Total								T
	0	0	0	0	0	0	0	