



SOUTHERN CALIFORNIA  
**EDISON**

An EDISON INTERNATIONAL<sup>®</sup> Company

A. Edward Scherer  
Manager of  
Nuclear Regulatory Affairs

August 18, 2005

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

**Subject: Docket Nos. 50-206, 50-361, and 50-362  
Semiannual 10 CFR 26 Fitness for Duty Program Data - 2005  
San Onofre Nuclear Generating Station, Units 1, 2 and 3**

Gentlemen:

In accordance with 10 CFR 26.71(d), this submittal provides the required semiannual Fitness For Duty Program Performance Data for the reporting period of January 1, 2005 to June 30, 2005 (Attachment 1).

A Summary of Information and Management Actions Report for the reporting period is included in Attachment 2.

If you have any questions, please feel free to contact Clay E. Williams at (949) 368-6707.

Sincerely,

**Attachment 1: 10 CFR 26 Performance Data**

**Attachment 2: Summary of Information and Management Actions Report**

cc: B. S. Mallett, NRC Regional Administrator, Region IV  
J. N. Donohew, NRC Project Manager, San Onofre Units 2, and 3  
C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3

P.O. Box 128  
San Clemente, CA 92672  
949-368-7501  
Fax 949-368-7575

A021

# FITNESS FOR DUTY PROGRAM

## Performance Data Personnel Subject to 10CFR26

Southern California Edison  
Company

January 1, 2005 to June 30, 2005  
6 months ending

San Onofre Nuclear Generating Station  
Location

S.L. Blue, Supervisor, Fitness for Duty  
CONTACT NAME

(949) 368-2482  
PHONE NUMBER

### CUTOFFS: SCREEN/CONFIRMATION (NG/ML)

MARIJUANA	50/10	BARBITURATES	300/200
COCAINE	300/150	BENZODIAZEPINE	300/300
OPIATES	300/300	METHADONE	300/200
AMPHETAMINES	1000/500	PROPOXYPHENE	300/200
METHAMPHETAMINE	1000/500	PHENCYCLIDINE	25/25
AMPHETAMINE	/200	ALCOHOL (%BAC)	.04

TESTING RESULTS	Licensee Employees				Contractor Personnel (SHORT TERM ONLY)		
AVERAGE NUMBER W/UNESCORTED ACCESS	2116				702		
Categories	# TESTED	# POSITIVE	# REFERRED TO MANDATORY TREATMENT	# ACCESS RESTORED	# TESTED	# POSITIVE	# ACCESS RESTORED
Pre-Access	201	0	0	0	368	0	0
For Cause	2	0	0	0	2	0	0
Post Accident	1	0	0	0	0	0	0
Random	647	3	2	0	187	1	0
Follow-Up	17	0	0	0	4	0	0
Other	2	0	0	0	0	0	0
Total	870	3	2	0	561	1	0

Random Testing during this period = 30%

**Table 1. RANDOM TESTING PROGRAM RESULTS**

<b>Individuals Tested</b>	2000		2001		2002		2003		2004		2005	
	# Failed	# Tested	% Failed	# Failed	# Tested	% Failed	# Failed	# Tested	% Failed	# Failed	# Tested	% Failed
# Failed	0	3	.4%	2	2	.3%	4	3	.6%	4	0	.0%
# Tested	592	822		559	725		799	470		577	721	
% Failed	.0%	.4%		.4%	.3%		.5%	.6%		.7%	.0%	

**Table 2. BREAKDOWN OF CONFIRMED POSITIVE TESTS**

	Marijuana		Cocaine	Amphetamines	Opiates	Alcohol	
	100/15 <sup>a</sup>	50/10 <sup>b</sup>					
Licensee Employees	1	1	1	0	0	1	
Contract Workers	1	1 <sup>c</sup>	0	0	0	0	TOTAL
Totals	2	2 <sup>c</sup>	1	0	0	1	4
Onsite Presumptive		3	1	<sup>a</sup> - NRC levels <sup>b</sup> - SCE levels <sup>c</sup> - Includes the total positive at 100/15 <sup>d</sup> - Presumptive positive level was borderline and was not confirmed by offsite lab.			
# Certified Lab		2 <sup>cd</sup>	1				
Confirmation Ratio		67%	100%				

Summary of Information and Management Actions Report  
(Reporting Period: January 1, 2005 – June 30, 2005)

1. There were no temporary suspensions or other administrative actions taken against individuals based upon on-site presumptive positive tests for marijuana or cocaine.
2. Three (3) employees and one (1) contract worker were denied unescorted protected area access following a random chemical test failure. One (1) employee was terminated, in accordance with SONGS site policy, as the random test failure constituted a second test failure. This event was reported to the NRC (see item 6B below).

Two (2) employees were subject to disciplinary action and were referred for mandatory treatment under the provisions of the SONGS site policy following a first test failure. One of these two events was reported to the NRC (see item 6A below).

The contract worker was provided detailed information regarding the right to appeal management actions resulting in access denial.

3. There were no transfers of licensee employees to non-nuclear positions (away from San Onofre site) as a result of failed chemical tests.
4. The MRO reviewed three (3) employees and one (1) contract worker's appeal test results. The original test results were confirmed. The individuals were provided with detailed instructions regarding the right to appeal management actions resulting in access denial.
5. There were no identified deficiencies in the Fitness for Duty program.
6. Two (2) telephone notifications were made to the NRC in accordance with 10 CFR 26.73 for this reporting period (NRC Operations Event Log numbers 41492 and 41745). The notification text is as follows:

A. NRC Operations Event Log No. 41492

"On March 14, 2005, Southern California Edison's (SCE) Medical Review Officer (MRO) met with an SCE employee (a supervisor) and at about 1125 PST confirmed positive results from a random fitness for duty test. The employee's Protected Area access was suspended and was placed on investigatory suspension. SCE is submitting this report in accordance with 10CFR26.73(a)(2).

"The employee reported for a random FFD test on March 10, 2005 and initial presumptive testing was positive for an illegal substance. The sample was sent off site for confirmation testing and on March 14, 2005, SCE's MRO received the positive test results for an illegal substance.

"At the time of this report, both Units 2 and 3 were operating at approximately 100 percent power. The NRC Resident Inspectors have been notified of this occurrence and will be provided with a copy of this report."

B. NRC Operations Event Log No. 41745

"On June 3, 2005, as the employee (a supervisor) was entering the Protected Area (PA) for a scheduled work shift, the employee was informed of the selection for a random FFD test. As allowed by plant procedures, the employee entered the PA at about 0520 PDT, but not any vital areas, before reporting for FFD testing at about 0607 PDT. At about 0633 PDT, breathalyzer test results were positive for alcohol. The employee requested that a blood sample be used for confirmatory testing. The employee's PA access was suspended, and the employee was placed on investigatory suspension.

"At the time of this report, Units 2 and 3 were operating at approximately 99 percent and 100 percent power, respectively. The NRC Resident Inspectors have been notified of this occurrence and will be provided with a copy of this report."