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Fax: 440-280-8029August 18, 2005
PY-CEI/NRR-2896LUnited States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555Perry Nuclear Power Plant
Docket No. 50-440
Subject: Semiannual Fitness-For-Duty Report


Ladies and Gentlemen:

In accordance with the requirements of 10CFR26.71(d), "Recordkeeping Requirements," the Semiannual Fitness for Duty Report is being submitted for the Perry Nuclear Power Plant. This report covers the time period of January 1, 2005 through June 30, 2005.

Attachment 1 provides the Fitness for Duty Program performance data regarding testing results. Attachment 2 provides additional information regarding reported events and management actions taken in response to positive results. The provisions of the Fitness for Duty Program apply to persons granted unescorted access to the Protected Area of the plant, as well as to licensee, vendor, and contractor personnel required to physically report to the Technical Support Center or the Emergency Operations Facility in accordance with the Emergency Plan and associated implementing procedures.

If you have questions or require additional information, please contact Mr. Jeffrey Lausberg, Manager – Regulatory Compliance, at (440) 280-5940.

Very truly yours,

**Attachments**cc: NRC Project Manager
NRC Resident Inspector Office
NRC Region III

A021

Fitness for Duty Program Performance Data Personnel Subject to 10CFR26

NOP-LP-1002-01 Rev. 00

<u>FirstEnergy Corporation (FirstEnergy Nuclear Operating Company)</u> <i>Company</i>	<u>June 30, 2005</u> <i>6 Months Ending</i>
<u>Perry Nuclear Power Plant - 10 Center Road - Perry, Ohio 44081</u> <i>Location</i>	
<u>Maureen T. Gilday-Gulliford, Supervisor, Nuclear Access</u> <i>Contact Name</i>	<u>(440) 280-5830</u> <i>Phone (include area code)</i>
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR26	
Marijuana 100/15	Amphetamines 1,000/500
Cocaine 300/150	Phencyclidine 25/25
Opiates 300/300	Alcohol (%BAC) .04%

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		898		N/A		605	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		107	0			1343	17
For Cause	Post accident	1	0			3	0
	Observed behavior	4	0			13	2
Random		247	0			146	1
Follow-up		20	0			39	1
Other-		0	0			0	0
Total		379	0			1544	21

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	0	0	0	0	0	0	0						
Long-Term Contractors	0	0	0	0	0	0	0						
Short-Term Contractors	7	3	0	0	0	2	9						
Total	7	3	0	0	0	2	9						21

Management Actions Taken

Drug and alcohol testing results for the reporting period are described in Attachment 1.

Zero (0) licensee employees tested positive for illegal drugs or alcohol during this reporting period.

One (1) licensee employee, who held unescorted access was subjected to for cause testing, which resulted in an alcohol level that was not positive, but the individual was deemed not fit for duty during this reporting period. This individual was mandated to the Employee Assistance Program (EAP), access authorization suitability was re-established, the individual was placed in the follow-up program, and unescorted access was reinstated.

Ten (10) contractor employees tested positive for illegal drugs and two (2) contractor employees tested positive for alcohol during this reporting period. All contractor employees were denied unescorted access to the Protected Area. Pursuant to Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty Program" requirements, the individuals were informed of their right to appeal and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, the two (2) contractor employees, testing positive for alcohol have exercised their right to appeal; however, the additional blood draw re-confirmed the positive breath alcohol content. The other contractor employees did not exercise their right to appeal and have not initiated steps to restore unescorted access.

Nine (9) contractor employees were determined to have attempted to subvert the drug testing process through adulteration. These contractor employees were denied unescorted access to the Protected Area due to their attempt of subversion for a minimum period of three (3) years. Additional denials were issued for falsification of their Chain-of-Custody Form, and in some cases falsification of their Self-Disclosure Questionnaire. Pursuant to Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty Program" requirements, the individuals were informed of their right to appeal and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, none of these contractor employees have exercised their right to appeal.

As a result of a Fitness for Duty Program concern, thirty-four (34) individuals were subject to unannounced follow-up testing during this reporting period. All testing results were negative, with the exception of one contractor employee who tested positive for alcohol during their follow-up test. Subsequent actions, related to this contractor employee, are outlined in paragraph two of this document.

Initiatives Taken

Focus during this reporting period was on in-processing of contractor personnel in support of the 10th refueling outage at Perry. Working Hour Guidelines Program is part of the FENOC Fitness for Duty Program. We continue to improve the electronic database for efficiency in initiating and approving working hour deviations.

Reported Events

None