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102-05425-SAB/TNW/CJJ  
February 28, 2006

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

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)  
Units 1, 2 and 3  
Docket Nos. STN 50-528/529/530  
Fitness-For-Duty Program Semiannual Performance Report**

Pursuant to 10 CFR 26.71(d), Arizona Public Service Company hereby provides, as an enclosure to this letter, the Fitness-For-Duty Program Semiannual Performance Report for the reporting period of July 1, 2005 through December 31, 2005.

No commitments are being made to the NRC by this letter. Should you have any questions, please contact Thomas N. Weber at (623) 393-5764.

Sincerely,

SAB/TNW/CJJ/ca

cc: B. S. Mallett           NRC Region IV Regional Administrator  
M. B. Fields            NRC NRR Project Manager  
G. G. Warnick           NRC Senior Resident Inspector for PVNGS

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

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**ENCLOSURE**

**ARIZONA PUBLIC SERVICE COMPANY**

**FITNESS-FOR-DUTY PROGRAM**

**SEMIANNUAL PERFORMANCE REPORT**

**JULY 1, 2005 THROUGH DECEMBER 31, 2005**

SEMIANNUAL PERFORMANCE REPORT

July 1, 2005 – December 31, 2005

PREPARED BY:

William G. Thomack II

William G. Thomack II 1-25-06  
Signature Date

APPROVED BY:

Ouida Bland

Ouida Bland 1-26-06  
Signature Date

REVIEWED BY:

Harold J. Winter

H. J. Winter 1/26/06  
Signature Date

## Introduction

The Arizona Public Service Company (APS) Fitness-for-Duty (FFD) Program continues to remain successful in its mission to maintain a drug-free workplace. During this reporting period, APS conducted 2874 tests. Of these, 910 were administered on a random basis. An equivalent annual testing rate of 55.9 percent was achieved during this reporting period.

APS experienced no confirmed positive random drug and alcohol tests during this reporting period. Therefore, the percentage of confirmed positive random drug and alcohol tests for this period is 0.0 percent.

## Analysis of Program Results

The confirmed positive drug and alcohol test results for this reporting period by type of test and type of drug are summarized in Table 1 and 2 respectively and are discussed below.

### **Pre-Access Testing:**

Cocaine	3	
Marijuana	6	
Amphetamines	1	
Alcohol	1	
Refusal to Test	1	
Total	12	confirmed positive tests

Comments: APS tested a total of 1766 individuals under the Pre-Access Testing category during this reporting period. Eleven individuals tested positive. One individual tested positive for two drugs, amphetamines and marijuana. The eleven individuals were contractors. Site access was denied and the individuals were released to their employers.

### **For Cause Testing:**

Alcohol	2	
Cocaine	1	
Total:	3	Confirmed Positive Tests

**Comments:** APS tested a total of 42 individuals under the For Cause testing category during this reporting period. For cause testing includes; behavior observation, post accident, suspected adulteration of specimens, or an odor of alcohol on an individual. Two individuals tested positive. Both individuals testing positive were contractors. One individual tested positive for two drugs, cocaine and alcohol. Site access was denied and the individuals were released to their employers.

**Random Testing:**

Total	0	Confirmed Positive Tests
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**Comments:** APS conducted a total of 910 tests under the Random category during this reporting period. None of the individuals tested were positive.

**Follow-up Testing:**

Total	0	Confirmed Positive Tests
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**Comments:** APS conducted a total of 127 tests under the Follow-up category during this reporting period. None of the individuals tested were positive.

**Other:**

Total	0	Confirmed Positive Tests
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**Comments:** APS tested 29 individuals in the other testing category during this reporting period. This category includes pre-employment testing. There were no positive tests.

**Reportable Events:**

There were no reportable events during this reporting period.

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

<b>Arizona Public Service Company</b>	<b>December 31, 2005</b>
<small>Company</small>	<small>6 months ending</small>
<b>Palo Verde Nuclear Generating Station (PVNGS)</b>	
<small>Location</small>	
<b>Ouida Bland</b>	<b>(623) 393-3228</b>
<small>Contact Name</small>	<small>Phone(include area code)</small>

Cutoffs: Screen/Confirmation (ng/ml) Appendix A to 10 CFR 26

Marijuana	100/15	Amphetamines	1000/500
Cocaine	300/150	Phencyclidine	25/25
Opiates	300/300	Alcohol (% BAC)	0.04%

PVNGS screening test for Marijuana uses a cut off level of 50 ng/ml							
Testing Results	Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel		
Average Number with Unescorted Access	2051		NA		1208		
Categories	# Tested	# Positive	# Tested	# Positive	# Tested	# Positive	
Pre- Access	115	0	NA	NA	1651	11	
For Cause	Post accident	12	0	NA	NA	6	0
	Observed behavior	10	0	NA	NA	14	2
Random	657	0	NA	NA	253	0	
Follow-Up	61	0	NA	NA	66	0	
Other	29	0	NA	NA	0	0	
<b>Total</b>	<b>884</b>	<b>0</b>	<b>NA</b>	<b>NA</b>	<b>1990</b>	<b>13</b>	

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

	Marijuana	Cocaine	Opiates	Ampheta- mines	Phency- clidine	Alcohol	Refusal to Test			Total		
Licensee Employees	0	0	0	0	0	0	0			0		
Long-Term Contractors	NA	NA	NA	NA	NA	NA	NA			NA		
Short-Term Contractors	6	4	0	1	0	3	1			15		
Total	6	4	0	1	0	3	1			15		

**Additional Information Required by 10 CFR 26.71 (d)**

Specimens screening positive for marijuana at 50 ng/ml: 8

Specimens screening positive for marijuana at 100 ng/ml: 4

These numbers include blind specimens sent to offsite lab for testing.