



A subsidiary of Pinnacle West Capital Corporation

Scott A. Bauer
Department Leader
Regulatory Affairs
Palo Verde Nuclear
Generating Station

Tel. 623-393-5978
Fax 623-393-5442
e-mail: sbauer@apsc.com

Mail Station 7636
PO Box 52034
Phoenix, Arizona 85072-2034

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

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

AC21

ENCLOSURE

ARIZONA PUBLIC SERVICE COMPANY

FITNESS-FOR-DUTY PROGRAM

SEMIANNUAL PERFORMANCE REPORT

JULY 1, 2005 THROUGH DECEMBER 31, 2005

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
-------	---	--------------------------

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
-------	---	--------------------------

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
-------	---	--------------------------

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**

Arizona Public Service Company	December 31, 2005
Company	6 months ending
Palo Verde Nuclear Generating Station (PVNGS)	
Location	
Ouida Bland	(623) 393-3228
Contact Name	Phone(include area code)
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
Total		884	0	NA	NA	1990	13

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.