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PY-CEI/NRR-3011LUnited States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555Perry Nuclear Power Plant
Docket No. 50-440
Subject: Semiannual Fitness-For-Duty Report

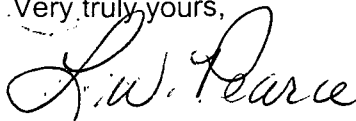
Ladies and Gentlemen:

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 July 1, 2006 through December 31, 2006.

Attachment 1 provides the Fitness for Duty Program performance data regarding testing results. Attachment 2 provides additional information regarding performance 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 there are any questions or if additional information is required, 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>December 31, 2006</u> <i>6 Months Ending</i>
<u>Perry Nuclear Power Plant - 10 Center Road - Perry, Ohio 44081</u> <i>Location</i>	
<u>Maureen Gilday-Gulliford, Access Authorization Supervisor</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% .02% (work status 2 hrs. or greater) .03% (work status 1 hr. or greater)

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access		914		N/A		219	
Pre-Access		57	0			214	1
For Cause	Post accident	2	0			2	0
	Observed behavior	4	2			1	0
Random		221	0			57	0
Follow-up		20	0			10	0
Other-		0	0			0	0
Total		304	2			284	1

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	0	1	0	0	0	1	0						
Long-Term Contractors	0	0	0	0	0	0	0						
Short-Term Contractors	0	0	0	0	0	1	0						
Total	0	1	0	0	0	2	0						3

Management Actions Taken

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

Two (2) 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 a confirmed positive drug result. The licensee employee was denied unescorted access to the Protected Area. Pursuant to Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty Program" requirements, the individual was informed of his/her right to appeal and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, the individual did not exercise his/her right to appeal. One (1) licensee employee, who held unescorted access, was subjected to for cause testing, which resulted in a confirmed positive alcohol level. The licensee employee was denied unescorted access to the Protected Area. Pursuant to Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty Program" requirements, the individual was informed of his/her right to appeal and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, the individual did not exercise his/her right to appeal.

Two (2) licensee employees, who held unescorted access, were subjected to for cause testing, which resulted in an alcohol result below the Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty Program" requirements. As a result, the licensee employees' unescorted access was placed on administrative hold. The Medical Review Officer (MRO) interviewed and evaluated the employees. The MRO recommended completion of a drug and alcohol assessment. One licensee employee's suitability has been re-established and unescorted access has been reinstated. One licensee employee is currently working through the drug and alcohol assessment process and suitability has not yet been re-established.

One (1) contractor employee, who did not hold unescorted access, was subjected to preaccess testing, which resulted in a confirmed positive test for alcohol during this reporting period. The contractor employee was denied unescorted access to the Protected Area. Pursuant to Nuclear Operating Procedure (NOP-LP-1002) "Fitness for Duty Program" requirements, the individual was informed of his/her right to appeal and of the procedural requirements in order to re-establish unescorted access to the Protected Area. To date, the contractor employee has not exercised his right to appeal.

Three (3) contractor employees, two held unescorted access and one was in-processing, were subjected to for cause testing, which resulted in negative results.

As a result of a Fitness for Duty Program concern, fifteen (15) individuals were subject to thirty (30) unannounced follow-up tests during this reporting period. All test results were negative.

It was self-identified that the laboratory monthly statistical summary [10 CFR 26, Appendix A (2.7) (g) (6)] was not forwarded from laboratory as required. Upon discovery, the laboratory was contacted and the monthly statistical summary was immediately faxed to the licensee's site. This incident was entered into the licensee corrective action program. The laboratory provided a written corrective action to ensure future compliance.

It was self-identified that there was improper administration of a fitness for duty drug test result. A non-negative drug test result, which was below regulatory confirmation cut-off levels, was inadequately reviewed. As a result, the non-negative drug result was entered as a negative result into the site Access Authorization system. This incident was entered into the licensee corrective action program. The investigation identified the cause for this inadequate review as improper utilization of human performance tools to ensure the established process was followed.

Initiatives Taken

Last reporting period the Fitness for Duty Evaluation form was implemented. The Fitness for Duty evaluation process provides a consistent method when evaluating personnel involved in plant events, accidents, near misses, and exhibiting aberrant behavior. During this reporting period, we continue to provide education and guidance to site supervision in the use of this process.

Reported Events

None