



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

February 26, 1998

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Gentlemen:

In the Matter of)	Docket Nos. 50-259	50-390
Tennessee Valley Authority)	50-260	50-391
		50-296	50-438
		50-327	50-439
		50-328	

FITNESS FOR DUTY (FFD) PROGRAM PERFORMANCE DATA: JULY-DECEMBER 1997

In accordance with 10 CFR 26.71(d), enclosed is TVA's FFD Program Performance Data for the six-month period of July 1-December 31, 1997. Enclosure 1 contains a discussion of recent FFD Program developments and FFD trends since the last reporting period. Enclosures 2-5 contain the performance data and summary of TVA management actions for TVA's nuclear plant sites (Browns Ferry, Sequoyah, Watts Bar, and Bellefonte, respectively). The data for TVA's Nuclear corporate organization (primarily employees assigned to Chattanooga and Knoxville) is consolidated as Enclosure 6. There were no FFD events reported to the NRC pursuant to 10 CFR 26.73 during this six-month period.

The random testing rate of drug and alcohol use for the workforce that is subject to random testing is in accordance with the requirements prescribed in 10 CFR 26.24 (a)(2).

If you have any questions concerning this information, please telephone Terry Knuettel at (423) 751-6673.

Sincerely,

Mark J. Burzynski
Mark J. Burzynski
Manager
Nuclear Licensing

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AD 211

Enclosures
cc: See page 2

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U.S. Nuclear Regulatory Commission

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Spring City, Tennessee 37381**

ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY (TVA)
FITNESS FOR DUTY (FFD) PERFORMANCE DATA
JULY 1-DECEMBER 31, 1997

FFD Developments

The following summarizes seven matters associated with TVA's FFD Program that occurred during this reporting period:

I. TVA's "Re-screening of Specimens"

Summary

Reference: TVA's policy to re-screen specimens with a creatinine level less than 20 mg/dl, which was addressed in the February 28, 1997, FFD Performance Report

TVA Nuclear (TVAN) screened 85 specimens at the lower cutoff for marijuana during this reporting period. No positive tests were identified.

II. Closing of Two TVA Medical Stations

Summary

Due to reorganization of TVA's Health Services Organization and consequent reductions in staff, two medical stations/collection facilities were closed (one of these stations closed in 1998 as indicated below). The Muscle Shoals, Alabama, Medical Station closed September 20, 1997. The Knoxville, Tennessee, Medical Station closed January 28, 1998. Individuals at these locations who are included in TVAN's random alcohol and drug testing population normally report to the nearest TVAN collection facility when selected and available. Generally, this will entail Muscle Shoals personnel reporting to Browns Ferry Nuclear Plant (BFN) and Knoxville personnel reporting to Watts Bar Nuclear Plant (WBN) for testing. Under normal conditions, this would involve approximately one hour of travel for those individuals requiring testing.

III. Changes Relevant to TVA's Employee Assistance Program (EAP)

Summary

Effective October 1, 1997, Occupational Health Consultants of America (OHCA) began administration of TVA's EAP. EAP services offered under OHCA remain the same, and TVA employees should not be affected by this administrative change.

IV. TVA Data Center Personnel Added to "Program Integrity"

Summary

Twenty-two Data Center (Information Services) personnel were issued Program Integrity Clearances during this reporting period. These personnel do not technically "administer the testing program" as described in 10 CFR Part 26, Appendix A, Section 2.3, "Preventing Subversion of Testing." However, they may, on occasion, have need to access very limited Drug Screening Program information or files in support of the Information Services Drug Screening Program Administrator.

V. TVAN For-Cause Testing Procedure Not Followed

Summary

TVAN's FFD Program procedure states in part: "... For-cause testing may also be conducted under the following conditions: ... When a person is reasonably suspected of: (1) Recent use of controlled substance(s) or alcohol" Contrary to this, on November 3, 1997, at approximately 10:30 p.m., a Sequoyah Nuclear Plant (SQN) Security Lieutenant was attempting to process a contract employee through the hand geometry readers when the lieutenant detected the odor of alcohol on the contract employee. A Sequoyah Nuclear Security officer verified that the employee smelled of alcohol. The contract employee stated that he had one beer at noon on that same day. The lieutenant contacted the security shift supervisor who, in turn, contacted the supervisor of the contract employee. The contract employee's supervisor decided to send the contract employee home. A for-cause alcohol and drug test was not administered.

Corrective Action

The contract employee was not allowed to enter the protected area after the odor of alcohol was detected, and he was subsequently terminated on November 4, 1997. A Problem Evaluation Report (PER) was generated. Copies of the PER were forwarded to other TVAN sites for information. The shift supervisor involved was given a verbal warning. Other Sequoyah Nuclear Security supervisors were briefed to prevent problem recurrence.

VI. Listing of Medications

Summary

10 CFR Part 26, Appendix A, Section 2.4 (g)(4) states in part: "... the collection site person shall ask the individual to sign a consent-to-testing form and to list all of the prescription medications and over-the-counter preparations that he or she can remember using within the past 30 days." The TVAN Health Services procedure for urine drug screen collection procedures in place at the time of the 1997 TVAN Quality Assurance audit of TVAN's FFD Program (conducted from October 6, 1997 to February 9, 1998) stated in part: "... Remind the individual that they may list all medications, both prescription and over-the-counter, taken during the last 30 days on the back of the form. The individual may keep the green copy for their information" The "Federal Drug Testing Custody and Control Form," supplied by the TVA contract drug testing laboratory, Clinical Reference Laboratory, contains the statement, "Should the results of the laboratory tests for the specimen identified by this form be confirmed positive, the Medical Review Officer will contact you to ask about prescriptions and over-the-counter medications you may have taken. Therefore, you may want to make a list of those medications as a 'memory jogger.' This list is not necessary. If you choose to make a list, do so either on a separate piece of paper or on the back of your copy ... Do not list on the back of any other copy of the form"

During the audit, the auditor observing the collection process found that donors were not required to list prescription medications and over-the-counter medications used within the past 30 days. [There was one incident in which a collector inadvertently forgot to ask the individual to list the medications; however, it was subsequently determined that this was an isolated incident and not routine practice.] While the auditor observed that the Health Services procedure, chain-of-custody form utilized, and practices regarding listing of medications were inconsistent with 10 CFR 26, Appendix A guidelines, he also noted that Health Services provided information from the October 9, 1997, "Drug Detection Report" which cited a federal court case (Jane Roe v. Cheyenne Mountain Conference Resort, Inc., 10th Circuit U.S. Court of Appeals, No. 96-1086, September 2, 1997) which indicated that requiring employees to divulge what prescription drugs they were taking violated the Americans With Disabilities Act (ADA).

Corrective Action

A PER was generated. TVA's Office of the General Counsel (OGC) was contacted for a legal interpretation. Health Services provided OGC with a copy of NUREG/CR-6470, "Fitness for Duty in the Nuclear Industry; Update on Technical Issues 1996," Attachment B, which stated, "In keeping with issues related to employee privacy and the ADA, it is best not to ask employees to divulge their use of legal drugs during the collection process" OGC reviewed the ADA and

found that the ADA, and the Rehabilitation Act of 1973 insofar as TVA is concerned, requires TVA to comply with federal regulations regarding alcohol and the illegal use of drugs established by the NRC. OGC also reviewed the NUREG/CR-6470 and confirmed that it was inconsistent with Part 26, Appendix A guidelines. However, because the NUREG was prepared by an NRC contractor or contractors, the NRC did not consider the NUREG as binding upon the agency. As an interim measure while the matter was being reviewed, Health Services began requiring its collectors to make and retain a copy of the tested individual's signed and dated list of medications. Upon completion of TVA's review of the matter, TVAN decided that unless and until the discrepancy between Part 26, Appendix A guidelines and the NUREG is rectified by rulemaking or otherwise, TVAN's corrective actions would include revising the Health Services urine collection procedure to require listing of medications. Tested individuals are now required to list medications on the back of the chain-of-custody form retained by Medical Services.

VII. TVAN Random Testing Procedure Not Followed

Summary

TVAN's FFD Program procedure stated that supervisors were responsible for notifying individuals of their selection for random testing and ensuring that the person reported to a medical facility for testing. The procedure also stated that the person selected is responsible for reporting promptly to the medical facility. TVAN General Employee Training for FFD included this requirement and further stated that there was no advance notice for random testing.

Contrary to the above, during September, 1997, (outage period) there were six incidents at WBN in which TVA employees or contract employees failed to follow procedures regarding random testing, i.e., two incidents in which employees failed to report promptly and four incidents of employees receiving advance notification (three of these employees were notified at home) of their selection for random testing.

Corrective Action

A PER was generated. Immediate corrective actions included:

- Individuals selected for random alcohol and drug testing were tested upon reporting to the WBN Medical Office.
- Corporate Nuclear Security requested WBN Nuclear Security to have each situation investigated to determine if there were any attempts to subvert TVAN's FFD Program.
- One of the contract companies involved (in addition to TVAN's final corrective actions, as discussed below) conducted a training class with their affected employees to ensure they understood how employees were to be notified of selection and to emphasize that employees were not to be contacted at home.
- The manager of the TVAN organization involved distributed an E-mail to affected employees regarding correct notification and reporting procedures.

An investigation was performed of each incident. It was concluded that there was no evidence that would substantiate any attempt to subvert the TVAN FFD Program. Investigations and interviews revealed there was a misconception among some supervisors that once selected, the individual had two hours to report to the medical facility. Also, some supervisors were determined to have over-zealously notified individuals at home to ensure the individual reported to the medical facility immediately upon arrival at the site, before reporting to work. A review of PERs at BFN, SQN, and WBN from January 1, 1995 through October 23, 1997, revealed no similar or like occurrences as those identified at WBN during this reporting period.

Final corrective actions included:

- The TVAN Performance Review/FFD Manager, Health & Safety Alcohol and Drug Testing Program Manager, and a WBN Security Specialist provided retraining on procedures regarding random notifications and reporting requirements to affected WBN personnel. Retraining was completed by January 15, 1998.
- The Health Services procedure for notification of individuals selected for random alcohol and drug tests was revised for clarification. The revision was effective November 7, 1997.
- TVAN's FFD Program procedure was revised to emphasize random notifications and reporting requirements. The revision was effective October 24, 1997.

JULY 1-DECEMBER 31, 1997

TRENDS

The confirmed positive test rate for all categories (pre-employment, pre-access, for-cause, post-accident, random, follow-up, and other) for this reporting period was 0.58 percent (27 positive tests) which is 0.14 percent higher than the last reporting period. TVA's review of this positive trend concluded that this trend resulted from hiring contract personnel to support the three refueling outages that occurred during this reporting period. This is indicative of the rigor of TVA's pre-employment drug screening program. The rate of random confirmed positives was 0.13 percent (2 positive tests) which is 0.03 percent lower than the last reporting period.

ENCLOSURE 2

SUMMARY OF MANAGEMENT ACTIONS FOR
BROWNS FERRY NUCLEAR PLANT

In the pre-access category, ten contract employees tested positive. The contract employees were denied access, removed from the site, and returned to the contractor. One of the ten contract employees requested, and was administered, a confirmatory blood alcohol test. The blood alcohol test reconfirmed the positive results. Five of the ten contract employees requested that their split specimens be tested. All five split specimen tests reconfirmed the positive results. Two of the ten contract employees requested an appeal. No positive test result decisions were overturned in the appeals process.

In the random test category, one contract employee tested positive. The contract employee's unescorted access was revoked, and the contract employee was returned to the contractor. The contract employee requested that a split specimen test be performed. The split specimen test reconfirmed the positive results. The contract employee did not request an appeal.

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

TENNESSEE VALLEY AUTHORITY	December 31, 1997
Company	6 Months Ending
BROWNS FERRY NUCLEAR PLANT	
Location	
REBECCA A. STANFIELD	(423) 751-8822
Contact Name	Phone (include area code)
Cut-offs: Screen/Confirmation	
<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/
Amphetamines	/
Cocaine	/
Phencyclidine	/
Opiates	/
Alcohol(%BAC)	/

*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access		1,460				607	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		76	0	N/A	N/A	1,147	10
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	1	0
Random		338	0	N/A	N/A	158	1
Follow-up		9	0	N/A	N/A	N/A	N/A
Other **		0	0	N/A	N/A	0	0
Total		423	0	N/A	N/A	1,306	11

** The other test category includes: transfer to TVAN from other TVA organizations; administrative follow-up; program integrity clearance/update; assignment to emergency response duties.

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refused to test	1	2	3	4	5
Licensee Employees	0	0	0	0	0	0	0	0	0	0	0	0
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Short-Term Contractors	10	0	0	0	0	1	0	0	0	0	0	0
Total	10	0	0	0	0	1	0	0	0	0	0	0

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Cutoff Levels of Additional Drugs

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300
6	N/A	N/A	N/A

ENCLOSURE 3

SUMMARY OF MANAGEMENT ACTIONS FOR
SEQUOYAH NUCLEAR PLANT

In the pre-access category, seven contract employees tested positive. One of the seven contract employees tested positive for two substances. The contract employees were denied access, removed from the site, and returned to the contractor. One of the seven contract employees requested, and was administered, a confirmatory blood alcohol test. The blood alcohol test reconfirmed the positive results. Two of the ten contract employees requested that their split specimens be tested. Both split specimen tests reconfirmed the positive results. None of the seven contract employees requested an appeal.

In the random testing category, one contract employee tested positive. The contract employee's unescorted access was revoked, and he was returned to the contractor. The contract employee requested that his split specimen be tested. The split specimen test reconfirmed the positive results. The contract employee requested an appeal. The positive test result decision was not overturned in the appeals process.

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

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 1997	
Company		6 Months Ending	
SEQUOYAH NUCLEAR PLANT			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
Cut-offs: Screen/Confirmation		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol (%BAC)	/

*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unreported Access		1,417		N/A		670	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		34	0	N/A	N/A	700	7
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	0	0
Random		327	0	N/A	N/A	171	1
Follow-up		4	0	N/A	N/A	N/A	N/A
Other **		1	0	N/A	N/A	0	0
Total		366	0	N/A	N/A	871	8

** The other test category includes: transfer to TVAN from other TVA organizations; administrative follow-up; program integrity clearance/update (I)-TVA; assignment to emergency response duties.

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opioids	Amphetamines	Phencyclidine	Alcohol	Refused to test	1	2	3	4	5
Licensed Employees	0	0	0	0	0	0	0	0	0	0	0	0
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Short-Term Contractors	4	3	0	1	0	1	0	0	0	0	0	0
Total	4	3	0	1	0	1	0	0	0	0	0	0

Cutoff Levels of Additional Drugs

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300
6	N/A	N/A	N/A

ENCLOSURE 4

SUMMARY OF MANAGEMENT ACTIONS FOR
WATTS BAR NUCLEAR PLANT

In the pre-access category, eight contract employees tested positive. The contract employees were denied access, removed from site, and returned to the contractor. Four of the eight contract employees requested that their split specimens be tested. All four split specimen tests reconfirmed the positive results. None of the eight contract employees requested an appeal.

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

TENNESSEE VALLEY AUTHORITY	DECEMBER 31, 1997
Company	6 Months Ending
WATTS BAR NUCLEAR PLANT	
Location	
REBECCA A. STANFIELD	(423) 751-8822
Contact Name	Phone (include area code)
Cut-offs: Screen/Confirmation	
<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/
Amphetamines	/
Cocaine	/
Phencyclidine	/
Opiates	/
Alcohol (%BAC)	/

*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access		1,053		N/A		572	
Pre-Access		42	0	N/A	N/A	1,072	8
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	1	0	N/A	N/A	0	0
Random		224	0	N/A	N/A	149	0
Follow-up		2	0	N/A	N/A	N/A	N/A
Other **		0	0	N/A	N/A	0	0
Total		269	0	N/A	N/A	1,221	8

** The other test category includes: transfer to TVAN from other TVA organizations; administrative follow-up; program integrity clearance/update; assignment to emergency response duties.

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refused to test	1	2	3	4	5
Licensed Employees	0	0	0	0	0	0	0	0	0	0	0	0
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Short-Term Contractors	6	1	0	1	0	0	0	0	0	0	0	0
Total	6	1	0	1	0	0	0	0	0	0	0	0

Cutoff Levels of Additional Drugs

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300
6	N/A	N/A	N/A

ENCLOSURE 5

**SUMMARY OF MANAGEMENT ACTIONS FOR
BELLEFONTE NUCLEAR PLANT**

There were no positive tests at Bellefonte during this reporting period.

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

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 1997	
Company		6 Months Ending	
BELLEFONTE NUCLEAR PLANT			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
Cut-offs: Screen/Confirmation		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cut-off	
Marijuana *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol(%BAC)	/

*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		N/A		N/A		N/A	
Average Number with Unescorted Access **		N/A		N/A		N/A	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		N/A	N/A	N/A	N/A	N/A	N/A
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	0	0
Random		28	0	N/A	N/A	6	0
Follow-up		0	0	N/A	N/A	N/A	N/A
Other ***		0	0	N/A	N/A	4	0
Total		28	0	N/A	N/A	10	0

** This is a construction site at which unescorted access has not been established.

*** The other test category includes: employment (4)-contract; transfer to TVAN from other TVA organizations; administrative follow-up; program integrity clearance/update.

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opioids	Amphetamines	Phencyclidine	Alcohol	Refused to test	1	2	3	4	5
Licensee Employees	0	0	0	0	0	0	0	0	0	0	0	0
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Short-Term Contractors	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0

Cutoff Levels of Additional Drugs

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Medetomidine	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300
6	N/A	N/A	N/A

ENCLOSURE 6

**SUMMARY OF MANAGEMENT ACTIONS FOR
CORPORATE TVAN OFFICES**

There were no positive tests in the Corporate TVAN Offices during this reporting period.

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

TENNESSEE VALLEY AUTHORITY		DECEMBER 31, 1997	
Company		6 Months Ending	
CORPORATE OFFICES (CHATTANOOGA, KNOXVILLE, OTHER)			
Location			
REBECCA A. STANFIELD		(423) 751-8822	
Contact Name		Phone (include area code)	
Cut-offs: Screen/Confirmation		<input checked="" type="checkbox"/> Appendix A to 10 CFR 26 * 50 ng/ml initial cu-off	
Marijuans *	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol (%BAC)	/

*Specimens with a creatinine level less than 20 mg/dl are evaluated using a 20 ng/ml cutoff on the initial marijuana screen and the limit of quantitation as a cutoff on the GC/MS for marijuana metabolite.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access **		N/A		N/A		N/A	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		N/A	N/A	N/A	N/A	N/A	N/A
For Cause	Post-accident	0	0	N/A	N/A	0	0
	Observed behavior	0	0	N/A	N/A	0	0
Random		124	0	N/A	N/A	3	0
Follow-up		0	0	N/A	N/A	N/A	N/A
Other ***		24	0	N/A	N/A	11	0
Total		148	0	N/A	N/A	14	0

** Persons assigned to the corporate organization, but with unescorted access at a TVAN site, are included in the average for the site or sites where they hold the unescorted access authorization.

*** The other test category includes: employment (11)-contract; transfer to TVAN from other TVA organizations (1)-TVA; administrative follow-up; program integrity clearance/update (24)-TVA; assignment to emergency response duties.

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Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refused to test	1	2	3	4	5
Licensed Employees	0	0	0	0	0	0	0	0	0	0	0	0
Long-Term Contractors	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Short-Term Contractors	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0

Cutoff Levels of Additional Drugs

DRUG NUMBER	SUBSTANCE	Cut-off Level (ng/ml)	
		Screen	Confirmation
1	Barbiturates	300	200
2	Benzodiazepines	300	250
3	Methadone	300	250
4	Methaqualone	300	250
5	Propoxyphene	300	300
6	N/A	N/A	N/A