

August 26, 2008

Document Control Desk U. S. Nuclear Regulatory Commission Washington, DC 20555

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION DOCKET NO. 50/395 OPERATING LICENSE NO. NPF-12 FITNESS FOR DUTY - SEMIANNUAL REPORT

As required by 10CFR26.71(d), attached is the Virgil C. Summer Nuclear Station's Fitness for Duty Report for the period from January 1 to June 30, 2008. This report includes the required test results, data analyses and a summary of management actions taken as a result of the testing.

Should you have any questions, please call Mr. George Fricks at (803)-345-4413.

Very truly yours,

David A. Lavigne

SBR/DAL/dr Attachment

C:

K. B. Marsh S. A. Byrne N. S. Carns J. H. Hamilton, Jr. R. J. White K. J. Browne L. A. Reyes R. E. Martin NRC Resident Inspector K. M. Sutton G. G. Douglass M. D. Sumner NSRC RTS (LTD 328) File (818.02-20, RR 2000) PRSF (RC-08-0110)

# V.C SUMMER NUCLEAR STATION FITNESS FOR DUTY SUMMARY 10 CFR 26.71(D) REQUIREMENTS JANUARY 01, 2008 – JUNE 30, 2008

## MANAGEMENT ACTIONS

### A. Positive Test Results:

There were eleven confirmed positive tests and one test that was declared confirmed substituted/adulterated by the Medical Review Officer (MRO) during this reporting period. One individual accounted for both a positive test result and a substituted/adulterated test result, as described in Management Actions, section A.2 of this report. These results and subsequent management actions can be categorized as follows:

#### 1. Pre-access Tests:

There were seven short-term contractors that tested confirmed positive for drugs. In these cases, appropriate management personnel were notified that these individuals would not be granted unescorted access authorization and would not be eligible to apply in the future.

There was one short-term contractor that tested confirmed positive for alcohol. In this case, the individual requested a blood test which was confirmed positive for alcohol by the Medical Review Officer. The appropriate management personnel were notified and this individual was denied unescorted access authorization.

### 2. Other Tests:

Contractors who are not badged and are not applicants for unescorted access authorization but who are located at V.C. Summer Nuclear Station for a period of 30 consecutive days or longer are required to participate in the Station Fitness for Duty Program.

Two of these short-term contractors tested confirmed positive for drugs. Appropriate management personnel were notified that these individuals would not be eligible to work at V. C. Summer Nuclear Station.

One short-term contractor tested confirmed substituted/adulterated and confirmed positive for drugs. This individual presented a specimen in which their creatinine level was lower than the normal range. As a result, the MRO requested an additional test be conducted under direct observation, which was approved by management. The direct observation collection led to a confirmed positive test for drugs. The original test was declared confirmed substituted/adulterated. Appropriate management personnel were notified that this individual would not be eligible to work at V. C. Summer Nuclear Station.

## B. Split Samples:

There were no split samples sent to the back-up laboratory for testing during this reporting period.

#### C. Direct Observations:

There was one direct observation performed at the request of the MRO. This direct observation resulted in a confirmed positive test for drugs (described in Management Actions, section A.2 of this report).

#### D. For-Cause Tests:

During this reporting period, there were eight for-cause tests conducted.

One of the tests was conducted on a permanent employee due to an injury/accident. The test was negative.

There were five for-cause tests conducted on long-term contractors. Two were conducted for inattentiveness on duty and two were conducted based on observed behavior. There was one conducted due to injury/accident. In all cases, the tests were negative.

Two for-cause tests were conducted on short-term contractors for observed behavior. The tests were negative.

## **DATA ANALYSIS**

#### A. Random Testing:

There were 379 random tests conducted during this reporting period with no confirmed positive test. This constitutes a positive random test rate of 0%. The average population for this reporting period was 1306, resulting in a random test rate of 29.00% for this period. Of the 379 random tests, 56 were performed on back-shift, weekends or holidays.

#### **B.** Lower Cut-off Levels:

No confirmed positives were detected due to the lower cut-off levels for marijuana.

C. Blind Performance Testing:

During the first quarter of 2008, there were 308 genuine specimens and 48 blind performance test specimens submitted to the primary testing laboratory, which constitutes a blind performance test rate of 15.58%. In the second quarter of 2008, there were 570 genuine specimens and 75 blind performance test specimens submitted to the primary testing laboratory, which constitutes a blind performance test rate of 13.16%.

In both quarters, the percentage of positive and negative blind performance specimens submitted was 20% and 80%, respectively. All drugs included in our routine test panel were included in the positive specimens. There were no discrepant test results.

#### **D.** Population Groups:

- (1) One short-term contractor was responsible for a confirmed positive test for alcohol on a pre-access test.
- (2) There were ten short-term contractors responsible for ten confirmed positive tests for drugs and one substitution/adulteration:
  - Seven short-term contractors who were applying for unescorted access authorization tested confirmed positive for drugs on a pre-access test.
  - Two short-term contractors who were going to be on-site for more than thirty days but were not applying for unescorted access authorization tested confirmed positive for drugs on an "other" test.
  - One short-term contractor who was going to be onsite for more than thirty days tested confirmed adulterated/substituted on an "other" test and subsequently tested confirmed positive for drugs on an "other" category direct observation test.

#### MISCELLANEOUS

### A. Condition Reports

During Refueling Outage 17, a Fitness for Duty Collection Site Person (CSP) performed a preaccess initial breath analysis test on an incoming short term contractor in which positive results were indicated. A confirmatory breath analysis test should have subsequently been performed, but due to a communication error by the CSP, the individual was not tested. The CSP, a temporary worker hired for outage processing, was relieved of collection duties pending counseling and additional training. The short term contractor involved was not processed for unescorted access. A condition report was generated to document this occurrence.

## **B.** Self Assessments

A Fitness for Duty self assessment was conducted during this period, with the team consisting of three peer evaluators from other licensees and two V. C. Summer employees. This assessment generated 13 recommendations which are currently being evaluated.

## C. Software Change

In March 2008, the V. C. Summer Fitness for Duty Program ceased using the Data Tracking Program (DTP) as the primary FFD program in favor of the EMPACT system. Statistics from both systems were gathered / analyzed to provide the data in this report.

## **REPORTABLE EVENTS**

There were no reportable events during this reporting period.

## **SUMMARY**

In conclusion, SCE&G maintains an effective Fitness for Duty Program as indicated by the low rate of substance abuse among V. C. Summer Nuclear Station personnel. Providing a work environment free from the effects of drugs and alcohol remains a high priority for SCE&G.

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# FITNESS FOR DUTY PROGRAM PERFORMANCE DATA PERSONNEL SUBJECT TO 10CFR 26

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<u>South Carolina E</u>	lectric & Gas Company Company	June 30, 2008 6 Months Ending				
V. C. Summer Nu	uclear Station, Jenkinsville, SC	<u></u>				
	Location					
Gregg Douglass	/ George Fricks	<u>803-345-4567/345-4413</u>				
	Contact Name	Phone (include area code)				
Cutoffs: Scre	en/Confirmation (ng/ml)					
Marijuana	50/10	Alcohol (%BAC) .04				
Cocaine	300/150	$.03 \ge$ one hour on duty				
Opiates	300/300	.02 ≥ two hours on duty				
Amphetamines	1000/500					
Phencyclidine	25/25					

Testing Results Average Number with Unescorted Access Categories Pre-Access		Licensee Employees 772		Long-Term Contractor		Short-Term Contractor Personnel		
				247		187		
		# Tested 85	# Positive 0	# Tested 45	# Positive 0	# Tested 312	# Positive 8	
								For Cause
Observed behavior	0	0	4	0	2	0		
Random		234	0	68	0	77	0	
Follow-up		12	0	5	0	10	0	
Other		4	0	2	0	15	3	
Total		336	<u> </u>	125	0	416	11	

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# **BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

	Marijuana*	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test	Adulterated Substituted	
Licensee Employees	0 0	0	0	0	0	0	0	0	
Long-Term Contractors	0 0	0	0	0	0	0	0	0	
Short-Term Contractors	70	3	0	0	0	1	0	1	
Total	7 0	3	0	0	0	1	0	1	12

\*Lower cut off levels than Appendix A to 10 CFR26 required. Upper number represents total number of confirmed positives per population group while the lower number indicates how many of these positives were detected due to lower cut off level.

Note: one individual is responsible for two above tests.