



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear  
Generating Station

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102-05966-TNW/KAR.  
February 27, 2009

Attn: Document Control Desk  
U.S. Nuclear Regulatory Commission  
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, 2008, through December 31, 2008. Subsequent reports will be provided pursuant to 10 CFR 26.717(e) on an annual basis.

No commitments are being made to the NRC by this letter. Should you need further information regarding this submittal, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

Sincerely,

TNW/RAS/KAR/gat

Enclosure

cc: E. E. Collins Jr. NRC Region IV Regional Administrator  
J. R. Hall NRC NRR Project Manager  
R. I. Treadway NRC Senior Resident Inspector for PVNGS

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

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**ENCLOSURE 1**

**SEMIANNUAL PERFORMANCE REPORT**

**July 1, 2008 through December 31, 2008**

SEMIANNUAL PERFORMANCE REPORT

July 1, 2008 – December 31, 2008

PREPARED BY:

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## 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 2738 tests. Of these, 1091 were administered on a random basis. An equivalent annual testing rate of 66.2 percent was completed during this reporting period.

APS experienced four 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 0.36 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:**

Alcohol	1	
Marijuana	2	
Cocaine	1	
Methamphetamine	1	
Total	5	Confirmed Positive Test Results

Comments: APS tested a total of 1341 individuals under the "Pre-Access Testing" category during this reporting period. Five individuals tested positive. All five individuals were contractors. Site access was denied and the individuals were released to their employers.

#### **For Cause Testing:**

Marijuana	2	
Cocaine	3	
Opiates	1	
Methamphetamine	1	
Total:	7	Confirmed Positive Test Results

Comments: APS tested a total of 113 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. Seven individuals tested positive. All seven individuals were contractors. Site access was denied and the individuals were released to their employers.

**Random Testing:**

Cocaine	2	
Marijuana	1	
Amphetamine	1	
Total	4	Confirmed Positive Test Results

Comments: APS conducted a total of 1091 tests under the "Random Testing" category during this reporting period. Four individuals tested positive. Two individuals were APS employees. The employees were evaluated by the EAP staff and entered substance abuse treatment. Two individuals were contractors. Site access was denied and the individuals were released to their employers.

**Follow-up Testing:**

Alcohol	1	
Total	1	Confirmed Positive Test Results

Comments: APS conducted a total of 193 tests under the "Follow-up Testing" category during this reporting period. One individual tested with a trace amount of alcohol; which was a direct violation of the Follow-Up Contract, making the test result a positive test. The individual was a contractor. Site access was denied and the individual was released to their employer.

**Reportable Events:**

As defined in 10CFR 26.73, there was no reportable event during this reporting period.

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

<b>Arizona Public Service Company</b>		<b>December 31,2008</b>	
Company		6 months ending	
<b>Palo Verde Nuclear Generating Station (PVNGS)</b>			
Location			
<b>Martin T. Rhodes</b>		<b>(623) 393-2229</b>	
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: includes licensee/contractor		3296		N/A		N/A	
Categories	# Tested	# Positive	# Tested	# Positive	# Tested	# Positive	
Pre- Access	216	0	NA	NA	1125	5	
For Cause	Post accident	14	0	NA	NA	19	0
	Observed behavior	31	0	NA	NA	49	7
Random	759	2	NA	NA	332	2	
Follow-Up	104	0	NA	NA	89	1	
Total	1124	2	NA	NA	1614	15	

### Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to Test	Follow-Up Violation		Total		
Licensee Employees	0	1	0	1	0	0	0	0		2		
Long-Term Contractors	NA	NA	NA	NA	NA	NA	NA	NA		NA		
Short-Term Contractors	5	5	1	2	0	1	0	1		15		
<b>Total</b>	<b>5</b>	<b>6</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>		<b>17</b>		

### 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: 0

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