



# ENERGY NORTHWEST

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GO2-10-034

10 CFR 26.717

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397  
FITNESS FOR DUTY ANNUAL PERFORMANCE DATA REPORT  
JANUARY 1 TO DECEMBER 31, 2009**

Dear Sir or Madam:

Pursuant to 10 CFR 26.717, attached is the Energy Northwest Fitness for Duty (FFD) Annual Performance Data Report for January 1 to December 31, 2009 without subpart I. The Fitness for Duty Performance Data for fatigue and work hours as required by Part 26, Subpart I, 26.203 will be submitted separately. The data submitted in this report has been analyzed. No program weakness was identified during this reporting period. There are no commitments being made to the NRC by this letter.

Should you have any questions or desire additional information regarding this matter, please call CR Forrester, Manager, Nuclear Security at (509) 377-2290.

Respectfully,

D.K. Atkinson  
Vice President, Operational Support

Attachment: Fitness for Duty Annual Performance Data Report January 1 to  
December 31, 2009

cc: NRC Region IV Administrator  
NRC NRR Project Manager  
NRC Sr. Resident Inspector/988C  
RN Sherman - BPA/1399  
WA Horin - Winston & Strawn

A021

NRR

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**Personnel Subject to 10 CFR 26**

<b><u>Energy Northwest</u></b> Company	<b><u>December 31, 2009</u></b> 12 months ending
<b><u>Columbia Generating Station</u></b> Location	
<b><u>Chuck Forrester, Manager, Nuclear Security</u></b> Contact Name	<b><u>(509) 377-2290</u></b> Phone

Cutoffs: Screen/Confirmation (ng/ml)

Marijuana	50/15	Amphetamines	1000/500
Cocaine	300/150	Phencyclidine	25/25
Opiates	2000/2000	Alcohol (%BAC)	0.04%

Testing Results	Licensee Employees		Contractors/Vendors	
	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access: 1664	1171		493	
Pre-Access	388	5	1669	12
For-Cause Post-Accident	7	0	2	0
For-Cause Observed Behavior	23	2	9	0
Random	774	6	290	3
Follow-Up	42	1	5	0
Other	0	0	0	0
Return to Duty	7	0	2	0
<b>Total</b>	<b>1241</b>	<b>14</b>	<b>1977</b>	<b>15</b>

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**Breakdown of Confirmed Positive Tests for Specific Substances**

	THC	COCAINE	OPIATES	AMPHETAMINES	PCP	ALCOHOL	REFUSED	Tampering by Substitution
Licensee Employees	6	0	0	0	0	7	0	1
Contractors/ Vendors	8	2	0	1	0	1	1	2
Total	14	2	0	1	0	8	1	3

Refusal to test and tampering by substitution results are counted as positive in the testing results matrix.

# FITNESS FOR DUTY SEMI-ANNUAL PERFORMANCE DATA REPORT JANUARY 1 TO DECEMBER 31, 2009

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## FITNESS FOR DUTY PROGRAM SUMMARY

During the reporting period January 1 to December 31, 2009, the number of random tests performed was equivalent to the number required to test at an annual rate equal to at least 50 percent of the unescorted access population. The annual rate of positive results from random testing for the calendar year 2009 was 0.838 percent.

### POSITIVE RESULTS

There were twenty-nine positive test results reported during 2009. Calculated from the positives recorded from January 1, 1990 until December 31, 2009, marijuana is the drug of preference, accounting for 60 percent of all the positive results; cocaine is second, yielding 16 percent of all the positive results.

### MANAGEMENT ACTIONS

#### **Pre-Access Testing**

There were seventeen pre-access positive test results during this reporting period.

Access to Energy Northwest property was denied for five licensee employee applicants and twelve contractor/vendor employee applicants. Management was notified and the individual's files were annotated regarding the test results, access denial and management's actions.

One licensee employee applicant and one contractor/vendor employee applicant were confirmed as providing a substituted sample. The two individual's were permanently denied access at Energy Northwest. Management was notified and the individual's files were annotated regarding the permanent denial. The permanent denial information was recorded in the Personnel Access Data System (PADS) as required.

#### **Random Testing**

There were nine positive random test results during this reporting period.

Access was denied to Energy Northwest property for a minimum of fourteen days and referral to the Employee Assistance Program (EAP) for six licensee employees and three contractor/vendor employees. Management was notified and the individual's files were annotated regarding the test results, access denial and management action.

One contractor/vendor employee was confirmed as tampering with a sample by substitution for the random collection. The individual was permanently denied access at Energy Northwest. Management was notified and the individual's file was annotated regarding the permanent denial. The permanent denial information was recorded in the Personnel Access Data System (PADS) as required.

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At the time of the random failure by providing a substituted sample, the individual was employed as a foreman and as such had supervisory duties. This resulted in a Plant Event Report to NRC.

## **Follow-Up Testing**

There was one positive follow-up test result during this reporting period.

Access was denied to Energy Northwest property for a minimum of five years. Management was notified and the individual's file was annotated regarding the test results, access denial and management action. The five year denial information was recorded in the Personnel Access Data System (PADS) as required.

Presently, there are four Energy Northwest employees participating in the follow-up program.

## **For-Cause/Observable Behavior Testing**

There were thirty-two for-cause tests administered due to observable behavior; twenty-three licensee employees and nine contractor/vendor employees were tested during this reporting period. Of the thirty-two for-cause tests for observable behavior thirty tested negative and two tested positive. One of the two positive test results was reported to the NRC as a Plant Event report due to the individual's required supervisory duties.

The for-cause/observable behavior tests were administered after the following incidents:

- An Energy Northwest employee sustained a lost time knee injury while walking up a flight of stairs.
- An Energy Northwest employee sustained a recordable injury receiving medical treatment heat illness.
- Two Energy Northwest employees were observed as inattentive to duties.
- An Energy Northwest employee sustained a recordable injury due to a slip and fall.
- An Energy Northwest employee sustained a recordable injury due a splash in the eye.
- An Energy Northwest employee participated in a human performance issue of an unauthorized entry.
- Three Energy Northwest employees engaged in a compensatory measure procedure violation.
- Three contractor vendor employees were involved in an incident of a one inch sling failing when tensioned.
- Two contractor/vendor employees were involved in an incident of a channel lifting hoist rope parting.
- An Energy Northwest employee sustained a recordable knee injury while accessing the IDC's main gate.
- An Energy Northwest employee sustained a first aid injury in falling over boxes in a hallway.
- Two Energy Northwest employees were involved in a valve mis-position event.

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- An Energy Northwest employee sustained a recordable and lost time injury when a fork came off a fork lift.
- An Energy Northwest employee reported to post without required equipment.
- A contractor/vendor employee was observed engaging in unusual behavior.
- A contractor/vendor employee sustained a recordable injury laceration requiring stitches.
- Two Energy Northwest employees were observed exhibiting a strong odor of alcohol.
- Two Energy Northwest employees were involved in circuit breaker E-CB 8/3 faceplate bent while racking.
- Two contractor vendor employees were observed as E-C1-7 fused disconnect was inadvertently opened.
- An Energy Northwest employee sustained a recordable knee injury by falling.
- An Energy Northwest employee sustained a recordable wrist injury opening a Bullet Resistant Enclosure door.
- An Energy Northwest employee sustained a recordable injury requiring stitches to the hand after falling in the parking lot.

## **For-Cause/Post Accident Testing**

There were nine for-cause/post-accident tests administered during this reporting period. Seven licensee employee and two contractor/vendor employees were tested for cause/post-accident/near miss. All nine tests for-cause/post accident/near misses tested negative.

The for-cause/post-accident test was administered after the following incidents:

- An Energy Northwest employee while driving a company vehicle made a sharp turn and struck a concrete manhole cover.
- An Energy Northwest employee dropped a fire pump from a forklift.
- Two contractor/vendor employees were involved in an access road traffic accident.
- Two Energy Northwest employees were involved in a vehicle accident while exiting the vehicle trap leaving the site.
- An Energy Northwest employee while maneuvering a box truck turned too close to a building damaging the truck.
- An Energy Northwest employee backed a company vehicle into a yield sign.
- An Energy Northwest employee operating a company vehicle struck a jersey barrier.

No personal injuries were sustained as a result of the vehicle accidents or the near miss accidents.

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## **Return to Duty Testing**

There were nine Return to Duty tests administered during this reporting period. Return to Duty testing is administered following a Fitness for Duty failure as part of the reentry process when applying for unescorted access.

## **Sample Tampering by Substitution and Refusal to Test**

There were three attempts at tampering and one refusal to test during this reporting period.

One licensee employee applicant and one contractor/vendor employee applicant were confirmed by the Medical Review Officer as tampering with the collection by providing substituted samples. One contractor provided a low out of range sample temperature at 87°F on a pre-access test. One licensee employee applicant provided a high out of range sample temperature at 103°F. Both individuals remained in the collection facility and did provide samples under observed conditions. Both were permanently denied access at Energy Northwest. Management was notified and the individual's files were annotated regarding the permanent denial. The permanent denial information was recorded in the Personnel Access Data System (PADS) as required.

One contractor/vendor employee was confirmed as tampering with a random sample by substitution. The individual provided a high out of range sample temperature at 105°F. The individual remained in the collection facility and did provide another sample under observed conditions. At the time of the random failure and confirmed tampering by substitution, the individual was employed as a foreman and as such had supervisory duties. This resulted in a Plant Event Report to NRC. This contractor employee was permanently denied access at Energy Northwest. Management was notified and the individual's file was annotated regarding the permanent denial. The permanent denial information was recorded in the Personnel Access Data System (PADS) as required.

One contractor/vendor employee applicant refused to provide a urine sample during a pre-access test. The individual did understand the ramifications of refusing to provide a urine sample and continued to refuse and subsequently choose to leave the collection facility. The contractor/vendor was permanently denied access at Energy Northwest. Management was notified and the individual's files were annotated regarding the permanent denial. The permanent denial information was recorded in the Personnel Access Data System (PADS) as required.

## **ADMINISTRATIVE ACTIONS**

There were no administrative actions taken during this reporting period.

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## **EVENTS REPORTED TO THE NRC**

During this reporting period, there were two Fitness for Duty events that were reportable in 2009 in accordance with 10 CFR 26.719.

The first was a contractor/vendor employee was confirmed as tampering by sample substitution for a random collection as reported under both the random section and the sample tampering by substitution sections of this report. The substitution was discovered by high out of range temperature at 105°F. At the time of the random failure and tampering by substitution, the contractor/vendor employee was employed as a foreman and as such had supervisory duties. This resulted in a Plant Event Report to NRC. The individual was permanently denied access at Energy Northwest. Management was notified and the individual's file was annotated regarding the permanent denial. The permanent denial information was recorded in the Personnel Access Data System (PADS) as required.

The second was a licensee employee manager who failed an FFD test for cause due to observable behavior. At the time of the for cause test for observable behavior the individual was employed as a manager and as such had supervisory duties. This resulted in a Plant Event Report to the NRC. The individual was denied access for a minimum of fourteen days and referred to the EAP for treatment. The licensee employee manager subsequently resigned and did not return to work at Energy Northwest.

## **PROGRAM WEAKNESSES**

No program weaknesses were identified during this reporting period.

## **PROGRAM CHANGES**

Effective January 12, 2009, program changes were made to the Fitness for Duty drug and alcohol testing program to meet new 10 CFR Part 26 requirements.