



Entergy Nuclear Operations, Inc.

Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360

March 1, 2011

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

Fitness-for-Duty Program Annual Performance Data Report
For the Period January 2010 – December 2010

LETTER NUMBER: 2.11.014

Dear Sir or Madam:

This letter transmits the Pilgrim Nuclear Power Station (PNPS) Fitness-for-Duty Program Annual Performance Data Report for the period from January 2010 through December 2010 in accordance with the requirements of 10 CFR 26.717(e). This letter also transmits Single Positive Test Forms (SPTF) and data for the Fatigue Management Program, for the same period in accordance with 10 CFR 26.203(e).

There are no regulatory commitments made in this letter.

If you have any questions, please contact the undersigned at 508-830-8403.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joseph R. Lynch".

Joseph R. Lynch
Licensing Manager

JRL/ rmb

- Attachments:
1. Pilgrim 2010 Performance Data Report and Single Positive Test Forms (8 pages)
 2. Pilgrim 2010 Fatigue Management Program Performance Data Report (1 page)

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NPR

Fitness-for-Duty Program Annual Performance Data Report
For the Period January 2010 – December 2010

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Page 2 of 2

cc:

Mr. William M. Dean
Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415
(w/o Attachments)

Mr. Richard V. Guzman, Project Manager
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop O-8-C2
Washington, DC 20555

Sr. Resident Inspector, Pilgrim Station

Attachment 1

Letter 2.11.014

**Pilgrim 2010 Performance Data Report and Single Positive Test Forms
(8 pages)**

Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Fitness-For-Duty Program Performance Data Report
For the Period January through December 2010

INTRODUCTION

10 CFR 26.717(e) requires that nuclear power plant licensees periodically collect, compile and submit Fitness-for-Duty program performance data. Specifically, this performance data must include:

1. The random testing rate;
2. Drugs for which testing is conducted and cutoff levels, including results of tests using lower cutoff levels, tests for drugs not included in the Department of Health and Human Services (HHS) panel, and any special analyses of dilute specimens permitted.;
3. Populations tested;
4. Numbers of tests administered and results of those tests sorted by population tested (i.e., individuals in applicant status, permanent licensee employees, contractor/ vendor, etc.);
5. Conditions under which the tests were performed (i.e., pre-access, for cause, post-event, follow-up, and random);
6. Substances identified;
7. Number of subversion attempts by type;
8. Summary of management actions; and
9. A summary of all instances during the calendar year when the licensee waived the work hour controls; and a summary of corrective actions, if any, resulting from the analyses of these data, including fatigue assessments. [Reference 10 CFR 26.203(e)]

Fitness-for-Duty program performance data for Entergy's Pilgrim Nuclear Power Station for the period January through December 2010 are provided below and in the attached tables. Data on random testing rate and a summary of management actions (items 1 and 8) are given below. Data for the remaining items (2, 3, 4, 5, 6 and 7) are given in the attached tables (Enclosure 1). The data for Fatigue Management Program Annual Performance Report (item 9, in Enclosure 2), for the period from January thru December 2010 is also included.

An additional section not required by 10 CFR 26 is included in this report. The additional section summarizes events related to Pilgrim Station's Fitness-For-Duty program and lessons learned.

RANDOM TEST RATE

For the entire year of 2010, a total of 52.87% of the workforce was tested.

SUMMARY OF MANAGEMENT ACTIONS

Entergy used the definition of "Management Actions" implicit in Subpart D ("Management actions and sanctions to be imposed") to determine the content of this section.

Pre-Access Testing

During this period, a total of one hundred and eighty (180) pre-access tests were administered. The breakdown is sixty seven (67) licensee employees, zero (0) long term contractors and one hundred thirteen (113) short term contractors. None of the licensee employees tested positive. Of the short term contractors, two (2) tested positive for marijuana and were denied access to all Entergy plants for a minimum of three (3) years.

Random Testing

A total of four hundred and fifty seven (457) random tests were performed. Four hundred and two (402) were licensee employees and fifty five (55) were short term contractors. There were no positive random tests.

For Cause Testing

One (1) for-cause test was performed. This was a licensee employee and was conducted based upon observed behavior. The test result was negative.

Follow-up Testing

A total of six (6) follow-up tests were performed during this period. Four (4) of these were for one (1) licensee employee; the other two (2) were short term contractors. All of the results were negative.

Post Event

There was one (1) post event test conducted on a licensee employee. There were three (3) post event tests conducted on short term contractors. None of these tests were positive.

Other

This category includes tests repeated because the results of the specimen were negative, but the specimen was determined by the laboratory to have either a low specific gravity or a low concentration of creatinine. Since the inception of the new rule, there have been no specimens repeated since the testing is now conducted to the lowest level of detection (LOD) by the laboratory and determined to be negative.

Events Reported

There were no events during this time period that required reporting to the NRC. No performance indicators were identified during this period.

Lessons Learned and Program Events

There were no notable lessons learned or program events identified during this period.

Fitness For Duty Program

Annual Performance Data Report - Personnel Subject to 10CFR26

Section I - Company Data

Company: Entergy - Pilgrim Station Location: Entergy - Pilgrim Station 600 Rocky Hill Road Plymouth, MA 02360 Contact: Dave Burke Security Manager Phone: (508) 830-8320	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> Annual Report Period: 01/01/2010 To 12/31/2010 </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Drugs Tested For</th> <th style="text-align: left;">Screen/Confirmation (ng/ml)</th> </tr> </thead> <tbody> <tr> <td>Marijuana</td> <td>50/15</td> </tr> <tr> <td>Cocaine</td> <td>300/150</td> </tr> <tr> <td>Opiates</td> <td>2000/300</td> </tr> <tr> <td>Amphetamines</td> <td>1000/500</td> </tr> <tr> <td>Phencyclidine</td> <td>25/25</td> </tr> <tr> <td>Alcohol (%BAC)</td> <td>0.04% BAC</td> </tr> </tbody> </table> <p style="text-align: center;">Random Testing Rate Not Less Than 50% Annually</p>	Drugs Tested For	Screen/Confirmation (ng/ml)	Marijuana	50/15	Cocaine	300/150	Opiates	2000/300	Amphetamines	1000/500	Phencyclidine	25/25	Alcohol (%BAC)	0.04% BAC
Drugs Tested For	Screen/Confirmation (ng/ml)														
Marijuana	50/15														
Cocaine	300/150														
Opiates	2000/300														
Amphetamines	1000/500														
Phencyclidine	25/25														
Alcohol (%BAC)	0.04% BAC														

Section II - Testing Results

	Licensee Employee		Long-Term Contractor		Short-Term Contractor		Total	
Avg. Workforce	709.16				155.24		864.40	
Category	Tested	Positive	Tested	Positive	Tested	Positive	Tested	Positive
FOLLOW-UP	4	0	0	0	2	0	6	0
FOR-CAUSE	1	0	0	0	0	0	1	0
POST EVENT	1	0	0	0	3	0	4	0
PRE-ACCESS	67	0	0	0	113	2	180	2
RANDOM	402	0	0	0	55	0	457	0
Total	475	0	0	0	173	2	648	2

Section III - Breakdown of Confirmed Positive Tests for Specific Substances

	Alcohol	Ampheta- mines	Cocaine	Marijuana 50	Marijuana 100	Opiates 300	Opiates 2000	Phencycli- dine	Refused	Total
CONTRACTOR		0	0	0	2	0	0	0	0	2
LICENSEE EMPLOYEE		0	0	0	0	0	0	0	0	0
Total		0	0	0	2	0	0	0	0	2

Note: Discrepancies in the totals in this section versus Section II indicate that one or more tests detected multiple drugs. Refer to Section III for the declaration of these tests and their corresponding drugs.

Section IV - Random Testing Results

For Year 52.87 %

Section V - Dilute Results

Special analysis of dilute specimens permitted under 26.163 (a) (2)

Dilute Total:

0

Section VI - Subversion Attempts

	Physical Evidence	Refusal To Cooperate	Observed Actions	Others	Total
CONTRACTOR	0	0	0	0	0
LICENSEE EMPLOYEE	0	0	0	0	0
	0	0	0	0	0

Section VII - Management Actions

	14 Day Terms	1 Year Denial	3 Year Denial	5 Year Denial	Permanent	Total
CONTRACTOR	0	0	2	0	0	2
LICENSEE EMPLOYEE						
Total	0	0	2	0	0	2



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United States Nuclear Regulatory Commission

Protecting People and the Environment

Electronic Information Exchange

NRC FFD Program Performance Data Reporting System

Single Positive Test Form for the EIE General Submission Portal

Unique Reference Number (Licensee Supplied) PNP-2010-002

Note:

- 1) All fields are required except those marked 'optional'.
- 2) Entries in some form fields may result in information being auto-populated into other form fields.
- 3) Use Adobe Reader 8 or later for this form to work properly.

☐ Submission Update - check this box only if this is an update to a previous submission, in which case you must use the same Unique Reference Number.

Select Facility

Pilgrim [50-293]

Date of Collection (mm/dd/yyyy) 12/13/2010

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Other

Please elaborate

Snow Plow Driver

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)?

No

Test Results - 26.717(b)(4)

Test Validity

Valid

Test Type(s) for Result(s) Reported

Drug and Alcohol

Alcohol Testing

Breath

Drug Testing

Urine

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.1

No

Substance - 26.717(b)(2) & (b)(4)

Marijuana

Additional Substance (as applicable)

Please Select

Additional Substance (as applicable)

Please Select

Use NRC Cutoff (Yes / No)

Yes

Use NRC Cutoff (Yes / No)

Yes

Use NRC Cutoff (Yes / No)

Yes

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b)

No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

If this result relates to a subversion attempt, select one or more of the following choices as applicable.

If not a subversion attempt, do not select any of the four boxes.

☐ Physical Evidence

☐ Observed Actions/Behaviors

☐ Refusal to Cooperate

☐ Other

Management Actions - 26.717(b)(8)

Individual Sanction

3- Year Denial

Reason(s) for the Action (select all that apply):

☒ MRO Confirmation

☒ First drug or alcohol positive

☐ Resignation/Withdrawal

☐ Subversion

☐ Subsequent positive test result from testing

☐ Misuse

☐ Violation of 5-hour abstinence rule

☐ Other:

☐ Sale, Use or Possession in PA

Person(s) Responsible for Information Provided

Person 1 (required):

Dianne

First Name

Wilson

Last Name

Security Coordinator

Position Title

dwilso3@entergy.com

Email Address

Person 2 (optional):

First Name

Last Name

Position Title

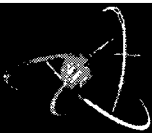
Email Address

Final Step (Required) - NRC will consider this form an official submission only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Form Locked On: Feb 23, 2011 at 8:33:39 AM

Save to Local PC

Print this Report



U.S.NRC
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Protecting People and the Environment

Electronic Information Exchange

NRC FFD Program Performance Data Reporting System

Single Positive Test Form for the EIE General Submission Portal

Unique Reference Number (Licensee Supplied) PNP-2010-001

Note:

- 1) All fields are required except those marked 'optional'.
- 2) Entries in some form fields may result in information being auto-populated into other form fields.
- 3) Use Adobe Reader 8 or later for this form to work properly.

☐ Submission Update - check this box only if this is an update to a previous submission, in which case you must use the same Unique Reference Number.

Select Facility

Pilgrim [50-293]

Date of Collection (mm/dd/yyyy) 06/17/2010

Reason for Testing - 26.717(b)(5)

Pre-Access

Pre-Access Testing Reason (optional)

Initial Authorization

Employment Type - 26.717(b)(3)

Contractor/Vendor

Labor Category - 26.717(b)(3)

Other

Please elaborate

Clerical person for Credit Union Branch at Station

Refusal - 26.717(b)(7) & 26.75

Was this collection refused (Yes / No)?

No

Test Results - 26.717(b)(4)

Test Validity

Valid

Test Type(s) for Result(s) Reported

Drug and Alcohol

Alcohol Testing

Breath

Drug Testing

Urine

Was this collection observed (Yes / No)? - 26.717(b)(7) & 26.1

No

Substance - 26.717(b)(2) & (b)(4)

Marijuana

Additional Substance (as applicable)

Please Select

Additional Substance (as applicable)

Please Select

Use NRC Cutoff (Yes / No)

Yes

Use NRC Cutoff (Yes / No)

Yes

Use NRC Cutoff (Yes / No)

Yes

Is this a 24-Hour Reporting Event (Yes/No)? - 26.719(b)

No

Subversion Attempts - 26.717(b)(7) and 26.75(b)

If this result relates to a subversion attempt, select one or more of the following choices as applicable.

If not a subversion attempt, do not select any of the four boxes.

☐ Physical Evidence

☐ Observed Actions/Behaviors

☐ Refusal to Cooperate

☐ Other

Management Actions - 26.717(b)(8)

Individual Sanction

3- Year Denial

Reason(s) for the Action (select all that apply):

☒ MRO Confirmation

☒ First drug or alcohol positive

☐ Resignation/Withdrawal

☐ Subversion

☐ Subsequent positive test result from testing

☐ Misuse

☐ Violation of 5-hour abstinence rule

☐ Other:

☐ Sale, Use or Possession in PA

Person(s) Responsible for Information Provided

Person 1 (required):

Dianne

Wilson

Security Coordinator

dwliso3@entergy.com

First Name

Last Name

Position Title

Email Address

Person 2 (optional):

First Name

Last Name

Position Title

Email Address

Final Step (Required) - NRC will consider this form an official submission only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Form Locked On: Feb 23, 2011 at 8:29:34 AM

Save to Local PC

Print this Report

Attachment 2

Letter 2.11.014

**Pilgrim 2010 Fatigue Management Program Performance Data Report
(1 page)**

Fatigue Rule Waivers Issued for 2010

Facility: Pilgrim Nuclear Power Station

Period of Report: 1/1/2010 – 12/31/2010

Facility Outage During Report Period: No

WORK HOUR LIMIT	OPERATIONS		MAINTENANCE		SECURITY		HP / RADPRO		CHEMISTRY		FIRE BRIGADE (B)	
Max ceilings:												
	Online	Outage	Online	Outage	Online	Outage	Online	Outage	Online	Outage	Online	Outage
16h max in 24h	1	0	11	0	0	0	0	0	0	0	0	0
26h max in 48h	0	0	11	0	0	0	0	0	0	0	0	0
72 max in 7d	0	0	5	0	0	0	0	0	0	0	0	0
Rest Breaks:												
	Online	Outage	Online	Outage	Online	Outage	Online	Outage	Online	Outage	Online	Outage
10h between work periods	2	0	2	0	0	0	0	0	0	0	0	0
34h in any 9-days	0	0	2	0	0	0	0	0	0	0	0	0
Minimum Days Off – Online:												
1 MDO /wk; 8h shift	0		0		0		0		0		0	
2 MDO /wk; 10h shift	0		1		0		0		0		0	
2 MDO /wk; 12 hr shift			0									
2.5 MDO /wk; 12 hr shift	0						0		0		0	
3 MDO /wk; 12 hr shift					6							
Minimum Days Off – Outage:												
1 MDO / 7 days (rolling)			0									
3 MDO / 15 day period	0						0		0		0	
4 MDO / 15 day period					0							

NUMBER OF WAIVERS PER INDIVIDUAL EMPLOYEE (C)

NUMBER OF WAIVERS	OPERATIONS	MAINTENANCE	SECURITY	HP / RADPRO	CHEMISTRY	FIRE BRIGADE (B)
1	1	7	6	0	0	0
2	1	5	0	0	0	0
3	0	1	0	0	0	0
4	0	2	0	0	0	0
5	0	0	0	0	0	0
6	0	0	0	0	0	0
Highest number of waivers for an individual employee	2	4	1	0	0	0