

WISCONSIN PUBLIC SERVICE CORPORATION  
KEWAUNEE NUCLEAR POWER PLANT  
GENERAL ADMINISTRATIVE PROCEDURE

NO. GAP 2.17.2

REV. A

TITLE Specimen Collection Procedure

DATE JAN 22 1990

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REVIEWED BY

*Michael J. Jones*

APPROVED BY

*M. L. March*

NUCLEAR  
SAFETY RELATED

☐ YES

☒ NO

PORC REVIEW  
REQUIRED

☐ YES

☒ NO

SRO APPROVAL OF  
TEMPORARY CHANGES  
REQUIRED

☐ YES

☒ NO

### 1.0 PURPOSE

The purpose of this procedure is to define the method to be used for urine collection and alcohol testing in accordance with the KNPP Fitness for Duty Program. This procedure includes the actions to be taken by the individual being tested and the individual administering the testing.

### 2.0 APPLICABILITY

This procedure applies to all persons granted unescorted access to KNPP and to WPSC, vendor, or contractor personnel required to physically report to the Emergency Operations Facility in accordance with the Emergency Plan.

Vendors or contractors who have a Fitness For Duty Program which meets 10 CFR 26 and has been approved by WPSC may not be subject to this procedure.

NRC employees, law enforcement personnel, or off-site fire and medical personnel are exempt from this procedure while responding on site.

### 3.0 REFERENCES/DEFINITIONS

#### 3.1 References

3.1.1 10 CFR Part 26

3.1.2 ACD 2.17, Fitness for Duty Program

3.1.3 WPSC Corporate Fitness for Duty Program

#### 3.2 Definitions

3.2.1 "Aliquot" means a portion of a specimen used for testing.

- 3.2.2 "BAC". Blood Alcohol Concentration, which can be measured directly from blood or derived from a measure of the concentration of alcohol in a breath specimen, is a measure of the mass of alcohol in a volume of blood such that an individual with 100 mg of alcohol per 100 ml of blood has a BAC of 0.10 percent.
- 3.2.3 "Chain-of-custody". Procedures to account for the integrity of each specimen by tracking its handling and storage from the point of specimen collection to final disposition of the specimen.
- 3.2.4 "Collection Site". A place designated by the licensee where individuals present themselves for the purpose of providing a specimen of their urine, breath, and/or blood to be analyzed for the presence of drugs or alcohol.
- 3.2.5 "Collection site person". A person who instructs and assists individuals at a collection site and who receives and makes an initial examination of the specimen(s) provided by those individuals. A collection site person shall have successfully completed training to carry out this function or shall be licensed medical professional or technician who is provided instructions for collection. In any case where: (a) a collection is observed or (b) collection is monitored by non-medical personnel, the collection site person must be a person of the same gender as the donor.
- 3.2.6 "Permanent record book". A permanently bound book in which identifying data on each specimen collected at a collection site are permanently recorded in the sequence of collection.
- 3.2.7 "Reason to believe". Reason to believe that a particular individual may alter or substitute the urine specimen.
- 3.2.8 "Split sample". A portion of a urine specimen that may be stored by the licensee to be tested in the event of appeal.

#### 4.0 PROCEDURE FOR URINE COLLECTION

##### 4.1 The individual being tested shall:

- 4.1.1 When arriving at the collection site, provide the site collection person with positive identification by presenting a photo ID (i.e., driver's license or company photo ID card).

- 4.1.2 After you have been positively identified, read the "Information and Instruction Sheet" form (Form GAP 2.17.2-1) if not previously completed in step 5.1.2.
- 4.1.3 Remove any unnecessary outer garments such as a coat or jacket that might conceal items or substances that could be used to tamper with or adulterate the individual's urine, breath, or blood specimen. You may retain your wallet.
- 4.1.4 Wash and dry your hands prior to urination.
- 4.1.5 After washing hands prior to urination, remain in the presence of the collection site person.
- 4.1.6 Provide a urine specimen in the privacy of a stall or otherwise partitioned area that allows for individual privacy. Ensure that you provide at least 60 milliliters of urine. If you elect to retain a split sample, a additional 60 milliliters should be provided for a total of 120 ml. Under unusual circumstances, the Security Director may be contacted to authorize the sampling of blood in lieu of providing a urine sample. Three 10 milliliter tubes of blood will be required. If you elect to retain a split sample of blood, three additional 10 milliliter tubes of blood must be provided for a total of six 10 milliliter tubes of blood.
- 4.1.7 After the urine specimen has been provided and submitted to the collection site person, you may wash your hands if desired.
- 4.1.8 If the collection site person indicates that the temperature of the urine specimen is outside the acceptable range you may volunteer to have your oral temperature taken to provide evidence to counter the reason to believe that you may have altered or substituted the specimen.
- 4.1.9 Keep urine and blood specimens in view at all times prior to their being sealed and labeled. If a specimen is split and if any specimen is transferred to a second container, observe the splitting of the sample or the transfer of the specimen and the placement of the tamperevident seal over the container caps and down the sides of the containers.
- 4.1.10 Initial the identification labels on the specimen containers for the purpose of certifying that it is the specimen collected from you.

4.1.11 Read and sign a statement on the chain-of-custody form certifying that the specimens identified as having been collected from you are in fact the specimens you provided. Also list all of the prescription medications and over-the-counter preparations that you can remember using within the past 30 days.

4.1.12 Sign and date the "Information and Instruction Sheet" (Form GAP 2.17.2-1).

4.2 The collection site person shall:

NOTE: Supervisors, co-workers, and relatives of the individual being tested shall not perform any collection, assessment or evaluation procedures.

4.2.1 To deter dilution of urine specimens at the collection site, ensure that a toilet bluing agent is present in the toilet tank so the reservoir of water in the toilet remains blue. Also verify that no other sources of water exist in the enclosure where urination occurs.

4.2.2 In the exceptional event that a designated collection site is inaccessible and there is an immediate requirements for urine specimen collection (e.g., an accident investigation), a public or on-site rest room may be used accordingly if the following special precautions are taken. A collection site person of the same gender as the individual shall accompany the individual into the rest room which shall be made secure during the collection procedure. If possible, a toilet bluing agent shall be placed in the bowl and any accessible toilet tank. The collection site person shall remain in the rest room, but outside the stall, until the specimen is collected. If no bluing agent is available to deter specimen dilution, the collection site person shall instruct the individual not to flush the toilet until the specimen is delivered to the collection site person. After the collection site person has possession of the specimen, the individual will be instructed to flush the toilet and to participate with the collection site person in completing the chain-of-custody procedures.

4.2.3 If the individual fails to arrive for a urine or breath test at the assigned time, contact the appropriate authority to obtain guidance on the action to be taken.

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- 4.2.4 When an individual arrives at the collection site for a urine or breath test, ensure that the individual is positively identified as the person selected for testing (e.g., through presentation of photo identification or identification by the employer's representative). If the individual's identity cannot be established, the collection site person shall not proceed with the collection.
- 4.2.5 Fill out the appropriate information in the permanent log book (i.e., name of individual being tested, date, time, etc.)
- 4.2.6 After the individual has been positively identified, ask the individual to read the "Information and Instruction Sheet" form (Form GAP 2.17.2-1) if not previously completed in step 5.2.3.
- 4.2.7 Ask the individual to remove any unnecessary outer garments such as a coat or jacket that might conceal items or substances that could be used to tamper with or adulterate the individual's urine, breath, or blood specimen. Ensure that all personal belongings such as a purse or briefcase remain with the outer garments outside of the room in which the sample is collected. The individual may retain his or her wallet.
- 4.2.8 Instruct the individual to wash and dry his or her hands prior to urination.
- 4.2.9 After washing hands prior to urination, ensure that the individual remains in the presence of the collection site person and not have access to any water fountain, faucet, soap dispenser, cleaning agent or any other materials which could be used to adulterate the urine specimen.
- 4.2.10 Ask the individual to provide a urine specimen. The individual may provide his/her urine specimen in the privacy of a stall or otherwise partitioned area that allows for individual privacy.

**NOTE:** If urine samples cannot be provided for psychological or other unusual circumstances, the Security Director may be contacted to authorize the sampling of blood in lieu of providing a urine sample. Three 10 milliliter tubes of blood will be required. If the individual elects to retain a split sample of blood, three additional 10 milliliter tubes of blood must be provided for a total of six 10 milliliter tubes of blood.

4.2.11 Note any unusual behavior or appearance in the permanent record book and on the chain-of-custody form.

4.2.12 Upon receiving a urine specimen from the individual, ensure that it contains at least 60 milliliters of urine. If there is less than 60 milliliters of urine in the container, additional urine shall be collected in a separate container to reach a total of 60 milliliters. (The temperature of the partial specimen in each separate container shall be measured in accordance with Step 4.2.14 of this procedure, and the partial specimens shall be combined in one container.) The individual may be given a reasonable amount of liquid to drink for this purpose (e.g., a glass of water). If the individual fails for any reason to provide 60 milliliters of urine, contact the appropriate authority to obtain guidance on the action to be taken.

NOTE: If the individual elects to retain a split sample, an additional 60 milliliters should be provided for a total of 120 ml.

4.2.13 After the urine specimen has been provided and submitted to the collection site person, the individual shall be allowed to wash his or her hands.

4.2.14 Immediately after the urine specimen is collected, measure the temperature of the specimen. The temperature measuring device used must accurately reflect the temperature of the specimen and not contaminate the specimen. The time from urination to temperature measurement is critical and in no case shall it exceed 4 minutes.

4.2.15 If the temperature of a urine specimen is outside the range of 32.5° - 37.7°C/90.5°F - 99.8°F, that is a reason to believe that the individual may have altered or substituted the specimen, and another specimen shall be collected under direct observation of a same gender collection site person as described in Step 4.2.2 and both specimens shall be forwarded to the laboratory for testing. An individual may volunteer to have his or her oral temperature taken to provide evidence to counter the reason to believe the individual may have altered or substituted the specimen caused by the specimen's temperature falling outside the prescribed range.

4.2.16 Immediately after a urine specimen is collected, inspect the specimen to determine its color and look for any signs of contaminants. Any unusual findings shall be noted in the permanent record book.

4.2.17 All urine specimens suspected of being altered or found to be diluted shall be forwarded to the laboratory for testing.

4.2.18 Whenever there is reason to believe that a particular individual may alter or substitute the urine specimen to be provided, a second specimen shall be obtained as soon as possible under the direct observation of a same gender collection site person. Where appropriate, measures will be taken to prevent additional hydration.

A higher level drug testing program administrator shall review and concur in advance with any decision by a collection site person to obtain a urine specimen under the direct observation of a same gender collection site person based on a reason to believe that the individual may alter or substitute the specimen to be provided.

4.2.19 Keep specimens in view at all times prior to their being sealed and labeled. If a specimen is split and if any specimen is transferred to a second container, request the individual to observe the splitting of the sample or the transfer of the specimen and the placement of the tamperevident seal over the container caps and down the sides of the containers.

4.2.20 Ensure that the collection site person and the individual are present at the same time during procedures outlined in Steps 4.2.21 through 4.2.23.

4.2.21 Place securely on each container an identification label which contains the date, the individual's specimen number, and any other identification information provided or required by the drug testing program. If separate from the labels, the tamperevident seals shall also be applied.

4.2.22 Ask the individual to initial the identification labels on the specimen containers for the purpose of certifying that it is the specimen collected from him or her.

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- 4.2.23 Complete the chain-of-custody forms for both the aliquot and the split sample, if collected, and certify proper completion of the collection.
- 4.2.24 Ask the individual to read and sign a statement on the chain-of-custody form certifying that the specimens identified as having been collected from him or her are in fact the specimen he or she provided. Also ask the individual to list all of the prescription medication and over-the-counter preparations that you can remember using within the past 30 days.
- 4.2.25 Ask the individual to sign and date the "Information and Instruction Sheet" (Form GAP 2.17.2-1).
- 4.2.26 Enter in the permanent record book all information identifying the specimens. Sign the permanent record book next to the identifying information.
- 4.2.27 The specimens and chain-of-custody forms are now ready for transfer to the laboratory for analysis. If the specimens are not immediately prepared for shipment, they shall be appropriately safeguarded during temporary storage. Specimens that are not shipped from the collection site within 6 hours of collection and any retained split sample shall be placed in a secure refrigerator. Temperature of the refrigeration unit shall not exceed 6°C.
- 4.2.28 While any part of the above chain-of-custody procedures is being performed, it is essential that the specimens and custody documents be under the control of the involved collection site person. The collection site person shall not leave the collection site in the interval between presentation of the specimen by the individual and the securement of the samples with identifying labels bearing the individual's specimen identification numbers and seals initialed by the individual. If the involved collection site person leaves his or her work station momentarily, the specimens and chain-of-custody forms shall be taken with him or her or shall be secured. If the collection site person is leaving for an extended period of time, the specimens shall be packaged for transfer to the laboratory before he or she leaves the site.
- 4.2.29 Following collection of all of the required samples from all the designated individuals, the samples shall be packaged along with any required blind samples for shipment to the laboratory for analysis in accordance with GAP 2.17.6.



## 5.0 PROCEDURE FOR ALCOHOL TESTING

### 5.1 The individual being tested shall:

- 5.1.1 When arriving at the site collection site, provide the site collection person with positive identification by presenting a photo ID (i.e., your drivers license or company photo ID card).
- 5.1.2 After you have been positively identified, read the "Information and Instruction Sheet" form (Form GAP 2.17.2-1) if not previously completed in step 4.1.2.
- 5.1.3 Remove any unnecessary garments such as a coat or jacket that might conceal items or substances that could be used to tamper with or adulterate the breath or blood specimen. You may retain your wallet.
- 5.1.4 Upon request of the site collection person, provide a breath specimen by blowing into the breath analysis device. Repeat this action as requested by the site collection person.
- 5.1.5 If the alcohol breath tests indicate positive for a BAC at or above the 0.04 percent cut-off level, you may request a confirmatory blood test at your discretion. One 10 milliliter tube of blood will be required. If you elect to retain a split sample of blood, one additional 10 milliliter tube of blood must be provided for a total of two 10 milliliter tubes of blood. The provision of blood specimens for use to confirm a positive breath test for alcohol shall be entirely voluntary. In the absence of a voluntary blood test the second positive breath test shall be considered a confirmed positive.

NOTE: A failure to request a confirmatory blood test indicates that you accept the breath test results.

### 5.2 The collection site person shall:

NOTE: Supervisors, co-workers, and relatives of the individual being tested shall not perform any collection, assessment, or evaluation procedures.

- 5.2.1 If the individual fails to arrive for a breath test at the assigned time, contact the appropriate authority to obtain guidance on the action to be taken.

- 5.2.2 When an individual arrives at the collection site for a breath test, ensure that the individual is positively identified as the person selected for testing (e.g., through presentation of photo identification or identification by the employer's representative). If the individual's identity cannot be established, the collection site person shall not proceed with the collection and contact the Security Director or his alternate to obtain guidance on the action to be taken.
- 5.2.3 After the individual has been positively identified, ask the individual to read the "Information and Instruction Sheet" form (Form GAP 2.17.2-1) if not previously completed in step 4.2.6.
- 5.2.4 Enter in the permanent record book all information identifying the specimens. The collection site person shall sign the permanent record book next to the identifying information. Note any unusual behavior or appearance in the permanent record book.
- NOTE: If the breath test is being performed on a person who has been called in for duty outside the regularly scheduled work day and the person advises the supervision that alcohol has been ingested within a five hour period preceding scheduled arrival, results of these tests that indicate a greater than .04% BAC shall not be documented in the permanent record book except as noted below. This test is used as a screen for the individuals fitness for the call in and no documentation or disciplinary action should be taken (reference GAP 2.17.3).
- NOTE: If a test of an individual responding to a call-in does indicate that a BAC of greater than .04% exists and management determines that the severity of the plant situation necessitates that the individual perform the work, the individuals may be allowed to work above the .04% BAC but less than .1% BAC under direct supervision. In these cases, the BAC level and the management decision to allow the individual to perform the work shall be documented in the permanent record book. This documentation shall provide protection for the individual and shall not be used to penalize or discipline the individual being called in.
- 5.2.5 Ask the individual to remove any unnecessary outer garments such as a coat or jacket that might conceal items or substances that could be used to tamper with or adulterate the individual's breath or blood specimen. Ensure that all personal belongings such as a purse or briefcase remain with the outer garments outside the room in which the breath or blood sample is collected. The individual may retain his or her wallet.

- 5.2.6 Administer an alcohol breath test. Ensure that each breath specimen taken comes from the end, rather than the beginning, of the breath expiration. For each screening test, two breath specimens shall be collected from each individual no less than two minutes apart and no more than 10 minutes apart. The test results shall be considered accurate if the result of each measurement is within plus or minus 10 percent of the average of the two measurements (see formula below). If the two tests do not agree, the breath tests shall be repeated on another evidential-grade breath analysis device.

$$\frac{M_1 + M_2}{2} = \text{AVG}$$

$M_1$  = first breath specimen

$M_2$  = second breath specimen

Acceptance Criteria:  $(\text{AVG} - .1 \text{ AVG}) \leq M_1 \leq (\text{AVG} + .1 \text{ AVG})$  and

$(\text{AVG} - .1 \text{ AVG}) \leq M_2 \leq (\text{AVG} + .1 \text{ AVG})$

NOTE: Alcohol breath tests shall be delayed at least 15 minutes if any source of mouth alcohol (e.g., breath fresheners) or any other substances are ingested (e.g., eating, smoking, regurgitation of stomach contents from vomiting or burping).

- 5.2.7 If the results of the test performed indicate that the average of the two test values is at or above .04% BAC, as a confirmatory test, repeat the above procedure (step 5.2.6) on another evidential-grade breath analysis device.

NOTE: If the results of the second test conducted in step 5.2.7 indicate a BAC of .04% or greater, the individual may request a blood sample to confirm the results. If the individual requests a confirmatory blood test, the sample will be drawn by qualified medical personnel onsite or the individual should be taken to a medical facility designated by Wisconsin Public Service Corporation. A Chain of Custody form shall be completed when handling/processing a blood sample.

WISCONSIN PUBLIC SERVICE CORPORATION  
DRUG AND ALCOHOL TESTING  
INFORMATION AND INSTRUCTION SHEET

WPSC is exercising extreme care to insure that strict quality control measures are followed in the collection, handling, shipping, and analysis of your urine or blood specimen. You play an important role in this process and should be certain that you have provided an unadulterated urine specimen to the hospital. Remember, you are certifying that the urine specimen which you provide is yours and is unadulterated. Any adulteration or switching of the specimen is a breach of WPSC rules and you will be subject to discipline up to and including discharge.

For your own protection and peace of mind, you should:

- provide a picture identification to the person recording and packaging your specimens;
- provide an unadulterated urine specimen in the collection bottle provided;
- if providing a split sample of urine, you will be requested to provide an additional 60 milliliters of urine. (NOTE: A minimum of 20 milliliters of urine is required to provide an adequate split sample analysis);
- clean off the outside of the collection bottle after providing the specimen;
- witness, initial, and date the integrity seals placed on your specimens;
- verify the proper spelling of your name as recorded on the Toxicology Chain of Custody form;
- verify that your identification number has been properly recorded; and,
- verify that the control number placed on your specimen bottles are the same as those recorded on the Toxicology Chain of Custody form.

I HAVE READ THE ABOVE AND HAVE HAD AN OPPORTUNITY TO ASK QUESTIONS  
REGARDING THIS PROCEDURE.

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Employee Signature

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Date