

WISCONSIN PUBLIC SERVICE CORPORATION

NO. GAP 2.17.B

REV. A

KEWAUNEE NUCLEAR POWER PLANT

TITLE Fitness For Duty Performance
Data Report

GENERAL ADMINISTRATIVE PROCEDURE

DATE JAN 22 1990

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REVIEWED BY

M. J. ...

APPROVED BY

*M. J. ...*NUCLEAR
SAFETY RELATED☐ YES☒ NOPORC REVIEW
REQUIRED☐ YES☒ NOSRO APPROVAL OF
TEMPORARY CHANGES
REQUIRED☐ YES☒ NO

1.0 PURPOSE

The purpose of this general administrative procedure is to implement the recordkeeping and reporting provisions of 10 CFR 26.71, and 10 CFR 26 Appendix A subpart B.2.7(g).

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 and off-site fire and medical personnel are exempt from this procedure while responding on site.

3.0 DEFINITIONS

4.0 FFD PERFORMANCE DATA (FORM 1.8-1)

4.1 Requirement for Performance Data Report (Form GAP 1.8-1), shall be completed by the Program Administrator as follows:

4.1.1 Company - Enter Wisconsin Public Service Corporation.

4.1.2 Six Months Ending - This form is to be filled out on a semi-annual basis covering the periods of January 1 to June 30 and July 1 to December 31. The first required report will cover the period January 1, 1990 to June 30, 1990. (Implementation date is to be no later than January 3, 1990.)

4.1.3 Location - Enter Kewaunee Nuclear Power Plant

9009130210 900122
PDR ADDCK 05000305
P PDR

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- 4.1.4 Contact Name - Enter the name of person responsible for collecting the data and filling out the form.
- 4.1.5 Phone Number - Enter the phone number used to reach the responsible contact.
- 4.1.6 Cutoffs: Screen/Confirmation (ng/ml) - Enter specific cutoff levels used by the company or mark the box labeled Appendix A to 10 CFR. § 26 if the NRC standard cutoff levels are used. If more stringent cutoff levels are being used, record the values for both screen and confirmation in ng/ml (e.g. marijuana 50/15), except for alcohol which is recorded as a percentage of blood-alcohol concentration (BAC). If additional authorized substances are being tested in the company program, fill in the substance name and cutoff levels used in the blank spaces provided.
- 4.1.7 Average Number With Unescorted Access - There are three blanks to record the average number of licensee employees, long term contractor personnel, and short term contractor personnel in the unescorted access test population. The contractor personnel in the unescorted access test population should include those in approved contractor programs, as well as personnel in the licensee's program. The definition of long term and short term is the licensee's option (e.g. some define 6 months or less as short term). This separation would allow long term contractor employees, like security personnel, to be categorized separately from trade contractors that may be on site no longer than for an outage. If the company chooses not to split contractors into these two groups, then record total contractors in the short term contractor column and put N/A (not applicable) in the other space. In each category, the number to be entered is the average number of people in the random drug testing pool during the six-month reporting period (January 1 through June 30 or July 1 through December 31); it is the sum of the average weekly random test populations divided by the number of weeks in the reporting period.

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4.1.8 Categories - These blanks should contain the number of samples tested in each category and the number of confirmed positive samples in each category reported by the Medical Review Officer during the six-month reporting period. The rule does not differentiate between "pre-employment" and "pre-badging" or between "for cause" and "post-accident." The blanks provided on the form allow for a separation into these categories in case a company chooses to analyze the data for each category separately.

- The "pre-employment" testing category results would be limited to those persons seeking to get a job in the nuclear power portion of the company.
- The "pre-badging" testing category is for current employees who are being moved into a position in the company requiring unescorted access to the Protected Area.
- The "periodic" testing category is for use by those companies that will continue to test samples coincident with annual physicals or similar periodic events.
- The "for cause" testing category is for providing the results of tests based on behavioral observation programs or after receiving credible information that an individual is abusing drugs or alcohol.
- The "post accident" testing category results would be for those tests administered because of the occurrence of events as opposed to behavioral observations.

Only those categories required by the rule (pre-badging, for cause, random and follow-up) must be included in the data collection spaces, but companies are encouraged to use the additional data categories to aid in the evaluation of individual segments of the program.

The "# tested" in each category is the number of urine/breath samples provided for testing purposes. An individual may provide several samples during the period; each occasion is counted.

The "# positive" in each category is the number of confirmed positives. If the company uses cutoff levels more restrictive than DHHS/NRC, the "# positive" columns should be split; on the left side record confirmed positives based on DHHS/NRC cutoff levels and on the right side record confirmed positives based on the company's more restrictive cutoff levels.

- 4.1.9 # Referred to EAP - Record the total number of licensee employees referred to a Employee Assistance Program (EAP) because of testing positive on any alcohol or drug test for the six-month reporting period. This number need not be the same as the total number of positives, because of factors such as, the individual resigned, refused EAP, is a repeat offender, etc. Companies may also want to track contractors in a similar manner although no blank is provided. The shaded areas are not intended to be used.
- 4.1.10 # Access Restored - The rule requires that unescorted access to the Protected Area be denied to any person who the Medical Review Officer has determined to have a confirmed positive test. The "# Access restored" space is for recording the number of licensee employees who have had a confirmed positive test and who have done whatever the company policy requires in order to have their unescorted access status restored. Companies may also keep track of contractors in a similar manner although no blank is provided. The shaded areas are not intended to be used.
- 4.1.11 A summary of management actions taken should include:
1. Number of unescorted accesses revoked or other management sanctions applied.
 2. Any special unannounced or announced chemical tests.
 3. Any searches performed in the protected area.
 4. Any special audits of fitness for duty program elements.
- 4.1.12 Results of data analyses and any resulting improvements or corrective action made to the program.
- 4.1.13 A list of events reported to NRC under 10 CFR 26.73 including the date of the event, position of the individuals involved, circumstances of discovery, and management actions taken.

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4.1.14 The program administrator shall submit the completed form (GAP 1.8-1) to the manager of Nuclear Power within 45 days of the end of each 6 month reporting period (January-June and July-December).

4.1.15 The Manager of Nuclear Power shall review the data, prepare the NRC transmittal letter and submit the data within 60 days of the end of each 6 month period.

5.0 HISTORICAL TREND OF FFD TEST RESULTS (FORM GAP 1.8-2)

5.1 The Random Testing Program Results - This section provides space for recording the results of the semi-annual (or more frequent if desired) random drug/alcohol testing data for a period of up to five years. The upper portion has spaces to record the semi-annual values of the number of individuals tested (individuals may be tested more than once during the period) and the confirmed positive test results (recorded as one per occasion that an individual is tested even if that individual was positive for more than one of the substances listed under Confirmed Positive Test for Specific Substances (see Item 5.2). The lower portion is a five-year trend graph used to plot the total percent positive during each six-month reporting period (plotted semi-annually, or more frequently if desired).

Although there is no separation of percent positive for drugs versus percent positive for alcohol, some licensees may choose to plot drug and alcohol test results separately in addition to the total percent positive. Similarly, some companies may choose to separately plot employees and contractors. Separate sheets can be used if desired.

5.2 The Confirmed Positive Test for Specific Substances - This section provides spaces for the number of confirmed positive tests, recorded by substance, during each semi-annual reporting period. This must include test results for those substances listed and other drugs tested for during the 6 month reporting period. Please note that there is no direct correlation between the sum of these numbers and the number of positives entered in Item 5.1; multiple positives per individual in Item 5.1 are recorded as separate items in this table.

5.3 The completed form shall be transmitted to the manager of nuclear power along with any data analysis comments within 60 days of the end of each 6 month period.

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

Company _____	6 Months Ending _____
Location _____	
Contact Name _____	Phone (include area code) _____
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana /	Amphetamines / _____
Cocaine /	Phencyclidine / _____
Opiates /	Alcohol (% BAC) / _____

Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
Average Number with Unescorted Access			#	#				
Categories	# Tested	# Positive	Referred to EAP	Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment								
Pre-badging								
Periodic								
For cause								
Post accident								
Random								
Follow-up								
Other								
Total								

KNPP GENERAL ADMINISTRATIVE PROCEDURE 1.8

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

MANAGEMENT ACTIONS TAKEN

DATA ANALYSIS RESULTS/PROGRAM CHANGES IMPLEMENTED

EVENTS REPORTED UNDER 10 CFR 26.73

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Individuals Tested		1989		1990		1991		1992		1993	
# Positive											
# Tested											
% Positive											
Graph of % Positive	5										
	4										
	3										
	2										
	1										

Confirmed Positive Tests for Specific Substances

[illegible]