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WILSON, D.L.      Iowa Electric Light & Power Co.  
RECIP. NAME      RECIPIENT AFFILIATION  
Document Control Branch (Document Control Desk)

SUBJECT: Forwards fitness-for-duty performance data for Jul-Dec 1991 including, random testing results (confirmed positive tests, five-yr record) & summary rept.

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TITLE: "Semiannual Fitness for Duty Program Performance Rept/Data" 10CFR26.7

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Iowa Electric Light and Power Company

February 20, 1992  
DAEC-92-0077

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Subject: Fitness for Duty  
File: A-202

Gentlemen:

In accordance with 10 CFR 26.71(d), Fitness for Duty Rule, Record Keeping Requirements, please find enclosed Iowa Electric Light & Power Company's, Duane Arnold Energy Center performance information for the six month period July 1 to December 31, 1991.

Enclosures include:

- \* Fitness for Duty Program Performance Data  
Personnel Subject to 10 CFR 26
- \* Random Testing Program Results  
Confirmed Positive Tests (Five Year Record)
- \* Summary Report

If you have any questions regarding this submittal please contact  
D. Engelhardt at (319)851-7280.

Sincerely,



David L. Wilson  
Plant Superintendent - Nuclear

Enclosures: As stated

  
DLW/MD/DE/bj

cc: L. Liu  
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**FITNESS FOR DUTY PROGRAM**

# Performance Data Personnel Subject to 10CFR 26

<b>IOWA ELECTRIC LIGHT &amp; POWER COMPANY</b>	<b>12/31/91</b>
COMPANY <b>DUANE ARNOLD ENERGY CENTER</b>	6 MONTHS ENDING
LOCATION <b>DIANE ENGELHARDT</b>	<b>(319) 851-7280</b>
CONTACT NAME	PHONE (INCLUDE AREA CODE)

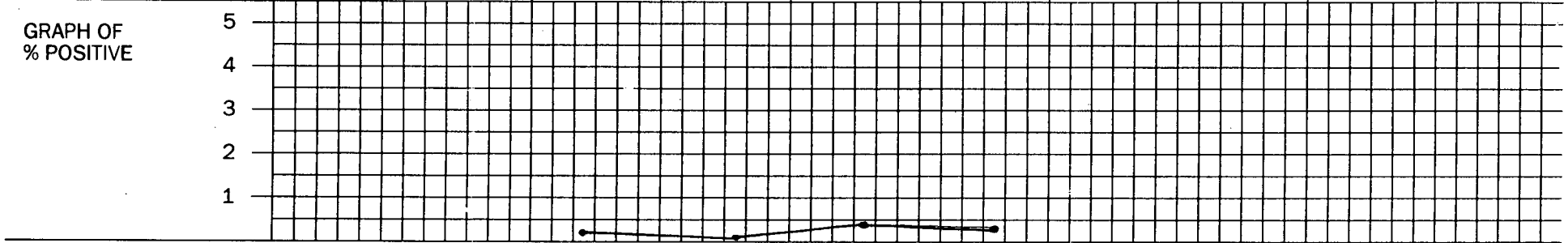
CUTOFFS: SCREEN/CONFIRMATION (ng/ml)  APPENDIX A TO 10CFR 26

MARIJUANA	300- / 15	AMPHETAMINES	1000 / 500	_____	/
COCAINE	300 / 300	PHENCYCLIDINE	25 / 25	_____	/
OPIATES	300 / 300	ALCOHOL (% BAC)	.04%	_____	/

TESTING RESULTS	LICENSEE EMPLOYEES				LONG-TERM CONTRACTOR PERSONNEL		SHORT-TERM CONTRACTOR PERSONNEL	
	# TESTED	# POSITIVE	# REFERRED TO EAP	# ACCESS RESTORED	# TESTED	# POSITIVE	# TESTED	# POSITIVE
AVERAGE NUMBER WITH UNESCORTED ACCESS	692				155	0	31	
PRE-EMPLOYMENT	171	1						
PRE-BADGING					59	0	13	0
PERIODIC								
FOR CAUSE								
POST ACCIDENT								
RANDOM	448	1			45	0	8	0
FOLLOW-UP	6	1			2	0	0	0
OTHER								
<b>TOTAL</b>	<b>625</b>	<b>3</b>			<b>106</b>	<b>0</b>	<b>21</b>	<b>0</b>

**RANDOM TESTING PROGRAM RESULTS**

INDIVIDUALS TESTED	1989		1990		1991		1992		1993	
# POSITIVE	N/A	N/A	1	1	2	1	N/A	N/A	N/A	N/A
# TESTED			552	685	529	511				
% POSITIVE			.18%	.14%	.37%	.20%				



**CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

MARIJUANA			8	3	1	2				
COCAINE			0	0	1	1				
OPIATES			0	0	0	0				
AMPHETAMINES			0	0	0	0				
PHENCYCLIDINE			0	0	0	0				
ALCOHOL			5	3	0	0				

FITNESS FOR DUTY SUMMARY REPORT  
JULY 1, 1991 TO DECEMBER 31, 1991

**MANAGEMENT ACTIONS TAKEN:**

DURING THIS REPORTING PERIOD, IOWA ELECTRIC LIGHT AND POWER COMPANY (IE) TOOK PROMPT ACTION IN EACH INSTANCE OF A POSITIVE DRUG TEST UNDER 10 C.F.R. PART 26. AN APPLICANT FOR EMPLOYMENT WAS FOUND TO BE POSITIVE FOR MARIJUANA IN A PRE-EMPLOYMENT TEST AND THE HIRING PROCEDURE WAS IMMEDIATELY TERMINATED. AN IE EMPLOYEE WHO HAD TESTED POSITIVE FOR MARIJUANA IN A RANDOM TEST DURING THE FIRST SIX MONTHS OF 1991 WAS AGAIN FOUND TO BE POSITIVE FOR MARIJUANA IN A FOLLOW-UP TEST DURING THIS REPORTING PERIOD. THE EMPLOYEE HAD BEEN REFERRED TO THE EMPLOYEE ASSISTANCE PROGRAM (EAP) AFTER HIS FIRST POSITIVE AND PLACED IN THE FOLLOW-UP TESTING PROGRAM. AFTER THE SECOND POSITIVE, HIS ACCESS AND EMPLOYMENT WAS IMMEDIATELY TERMINATED. THE COCAINE POSITIVE RESULTED FROM A RANDOM TEST. THE EMPLOYEE'S UNSCORTED ACCESS WAS SUSPENDED, HE WAS REFERRED TO THE EAP AND PLACED IN A NON-PAY STATUS FOR TWO WEEKS. AFTER COMPLETION OF A BACKGROUND INVESTIGATION AND PSYCHOLOGICAL EVALUATION, THE INDIVIDUAL WAS RETURNED TO WORK AND IS SUBJECT TO INTENSIVE FOLLOW-UP TESTING FOR DRUGS AND ALCOHOL AS WELL AS BEING REQUIRED TO ATTEND A SUBSTANCE ABUSE EDUCATION PROGRAM FOR A MINIMUM OF TEN WEEKS. THIS EMPLOYEE'S ACCESS TO THE PROTECTED AREA HAS NOT YET BEEN RESTORED.

**INITIATIVES TAKEN:**

NRC CONDUCTED AN INSPECTION OF THE IE FITNESS-FOR-DUTY PROGRAM IN OCTOBER 1991. THE INSPECTORS CONCLUDED THAT IE IS SATISFYING THE GENERAL PERFORMANCE OBJECTIVE OF PART 26. ONE SEVERITY LEVEL IV VIOLATION WAS IDENTIFIED WHICH RELATED TO INADEQUATE COMPLETION OF SEVERAL "SUITABLE INQUIRIES"; THE FAILURE TO SEND NRC DOCUMENTATION OF THE RESULTS OF AN UNSATISFACTORY BLIND PERFORMANCE TEST BY AN HHS-CERTIFIED LABORATORY WAS TERMED A WEAKNESS. BOTH OF THESE ITEMS WERE CORRECTED BEFORE THE INSPECTION WAS COMPLETED.

IE ALSO ESTABLISHED A SECURITY SPECIALIST POSITION TO PROVIDE DIRECT REVIEW AND OVERSIGHT OF THE FITNESS-FOR-DUTY AND ACCESS AUTHORIZATION PROGRAMS AT THE DUANE ARNOLD ENERGY CENTER.

**EFFECTIVE EVALUATION:**

WE BELIEVE THAT IE'S FITNESS-FOR-DUTY PROGRAM IS ACHIEVING THE INTENDED RESULT. ALTHOUGH THE POSITIVE RATE FOR RANDOM TESTING DURING 1991 WAS HIGHER THAN THE RATE OF 1990 (.29% VS. .16%), IT ACTUALLY REPRESENTS ONLY ONE ADDITIONAL POSITIVE (3 IN 1991 VS. 2 IN 1990). THE POSITIVE RATE FOR IE REMAINS BELOW THE INDUSTRY AVERAGE. THE FOLLOW-UP TESTING PROGRAM USED FOR AN INDIVIDUAL WHO HAD TESTED POSITIVE IN THE FIRST SIX MONTHS OF 1991 WAS EFFECTIVE IN THAT THE INDIVIDUALS CONTINUED USE OF AN ILLEGAL SUBSTANCE WAS DETECTED WITHIN FOUR MONTHS OF HIS RETURN TO WORK.

FOR THE SIX MONTH REPORTING 57.07% OF THE TOTAL POPULATION WAS TESTED. THE TOTAL FOR ALL OF 1991 IS 118.62% OF THE TOTAL AFFECTED POPULATION.

**EVENTS REPORTED UNDER 10 C.F.R. 26.73:**

ONE EVENT WAS REPORTED TO THE NRC UNDER SECTION 26.73 DURING THIS PERIOD. ON DECEMBER 26, 1991, WE REPORTED THAT A LICENSED REACTOR OPERATOR HAD TESTED POSITIVE FOR COCAINE DURING A RANDOM TEST. THE OPERATOR WAS REMOVED FROM DUTY AND HIS ACCESS SUSPENDED. ADDITIONAL ACTION TAKEN WITH RESPECT TO THIS INDIVIDUAL IS DESCRIBED ABOVE.

**LESSONS LEARNED:**

IN RESPONSE TO THE FINDINGS OF THE NRC INSPECTION, WE HAVE STRENGTHENED OUR PROCEDURES TO ASSURE THAT UNSATISFACTORY BLIND PERFORMANCE TESTS ARE REPORTED AND THAT SUITABLE INQUIRIES ARE CORRECTLY COMPLETED. WE ALSO PROVIDED ADDITIONAL INSTRUCTIONS TO THE MEDICAL REVIEW OFFICER IN ORDER TO ASSURE THAT FITNESS-FOR-DUTY PROGRAM MANAGERS ARE NOTIFIED OF POSITIVE TEST RESULTS PROMPTLY, EVEN DURING OTHER-THAN-NORMAL BUSINESS HOURS. WE ARE ALSO REVISING PROCEDURES TO EMPHASIZE THAT MANAGERS AND SUPERVISORS ARE ENCOURAGED TO SEEK ASSISTANCE FROM FITNESS-FOR-DUTY PROGRAM MANAGERS IN UNUSUAL SITUATIONS OR WHEN QUESTIONS ARISE.