



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Report of Misinterpretation of Fitness for Duty Drug Test Results

In accordance with 10 CFR 26.719 (c), STP Nuclear Operating Company (STPNOC) provides the attached report describing the results of the investigation regarding an incident in which the Medical Review Officer (MRO) misinterpreted fitness for duty drug test results.

On September 24, 2012, the MRO misinterpreted the results of a drug test which resulted in inappropriately granting unescorted access to a contract employee at the South Texas Project (STP) for a 3 day period. Although the individual was granted access, he never entered the protected area during this period. An investigation was completed on October 24, 2012. The results of the investigation are included in the attachment. STPNOC has taken corrective actions which are tracked in accordance with the STP Corrective Action Program.

If you should have any questions on this matter, please contact Robyn Savage at (361) 972-7438 or me at (361) 972-8602.

There are no commitments in this correspondence.

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Systems

rds

Attachment: Investigation Regarding Misinterpretation of Fitness for Duty Drug Test Results
(CR 12-27298)

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NR2

**Investigation Regarding Misinterpretation
of Fitness for Duty Drug Test Results (CR 12-27298)**

cc:

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**Investigation Regarding Misinterpretation
of Fitness for Duty Drug Test Results (CR 12-27298)**

Issue:

The Fitness for Duty (FFD) drug test results were misinterpreted by the Medical Review Officer (MRO) and as a result, unescorted access was granted to an individual for 3 days.

Narrative Summary of Issue:

On Monday, September 17, 2012, a contract individual at the South Texas Project (STP) provided a pre-access specimen at the STP Fitness for Duty (FFD) facility. The results of the specimen testing were faxed to STP from the certified laboratory and were reviewed by the Supervisor of FFD & Health Services on September 24, 2012. The results from the lab indicated the individual tested positive for an opiate.

The FFD Supervisor telephoned the MRO who lives in Houston and informed him of the positive result for opiates. The MRO subsequently interviewed the individual by telecom on September 24th from his home. Following the interview, the MRO informed the FFD Supervisor that the results should be considered negative based on his conversation with the pre-access individual and the verification of the individual's prescribed medication. Unescorted access was granted on September 25th based on the determination by the MRO.

On September 27, 2012, when the MRO reported to the site, he informed the FFD Supervisor that he believed he made an error in judgment regarding the negative test result for the individual he interviewed on September 24th by telecom. The MRO explained to the Supervisor that he started having reservations on the lab result interpretation when he recalled a similar case in the past and thought that the result was considered to be a positive for the identified opiate as in this case.

When the MRO returned to work at the site on September 27th, he reviewed his Medical Review Officer Handbook, and it indicated that the prescribed medication of the individual would not be positive for opiates. The prescribed medication would screen for the narcotic but not confirm in gas chromatography mass spectrometry (GCMS) testing. The prescribed medication was a semi-synthetic opioid narcotic possessing some properties characteristic of opiate narcotics but not derived from opium. The GCMS used in the analysis of specimens is calibrated at the lab for specific substances and positively identifies the actual presence of the prohibited substances in a given sample and would not misidentify a synthetic opioid as a true opiate. The specimen was correctly identified by the lab as an opiate (narcotic).

The MRO called the lab and verified they had run the specimen twice to validate duplicate results. The FFD Supervisor then called the contractor, requesting that the individual report to the STP FFD facility to be interviewed by the MRO. The FFD Supervisor notified Access Authorization personnel who immediately withdrew access by placing the individual's badge on hold pending further review.

The MRO interviewed the individual and informed him that he had tested positive for an opiate (narcotic) and inquired as to why he may have tested positive. The individual replied that it may have been because he took prescription medication that belonged to his deceased wife. The

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individual was informed that this was not acceptable and it was considered a FFD failure for the positive test result.

The FFD Supervisor initiated actions based on the change in the FFD determination to deny site access to the individual who was subsequently denied access unfavorably. A review of badge transactions determined the individual did not enter the protected or vital areas during the period from September 25th through September 27th in which he had been granted unescorted access to the site.

Apparent Cause:

The apparent cause was the failure of STP Nuclear Operating Company (STPNOC) to provide the MRO with the necessary tools for success which included a reference manual for home usage and STP human performance error reduction tools. The MRO did not have a Medical Review Officer Handbook at home to aid in the interpretation of lab results and was not provided training on human performance error reduction tools.

Corrective Actions:

1. The MRO was counseled on the importance of timely communications when concerns are questioned.
2. A Medical Review Officer handbook was provided to the MRO for home usage.
3. Training has been provided to the MRO on the use of STP's human performance error reduction tools to include questioning attitude, self-checking, and peer-checking.

Additional Information:

The current MRO at STP has had his medical license for 50 years and received his MRO certification in February 2011. The responses via telecom from the previous as well as the existing MRO have not had negative consequences such that individuals who failed FFD testing were actually granted access and entered the protected area. This is a first time event at STP.