

*SCED*  
**Southern California Edison Company**

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92672

H. E. MORGAN  
VICE PRESIDENT AND SITE MANAGER  
SAN ONOFRE

August 14, 1992

TELEPHONE  
714-368-9470

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Subject: Docket Nos. 50-206, 50-361 and 50-362  
Semiannual 10 CFR 26 Fitness For Duty Program Data  
San Onofre Nuclear Generating Station, Units 1, 2 & 3

Pursuant to 10 CFR 26.71(d), this submittal provides the required semiannual Fitness For Duty program performance data for the period January 1, 1992 to June 30, 1992.

The data is arranged as follows:

Attachment 1 is the six month data including all pertinent program statistics.

Attachment 2 provides a summary of data and management actions for the reporting period.

Attachment 3 graphically illustrates key data elements included in Attachment 1.

If you require any additional information, please so advise.

Sincerely,

*HE Morgan*

Attachments: 10CFR26 Performance Data

cc: C. W. Caldwell (USNRC Senior Resident Inspector, Units 1, 2 and 3)  
J. B. Martin (Regional Administrator, USNRC Region V)  
Institute of Nuclear Power Operations (INPO)

9208240093 920814  
PDR ADOCK 05000206  
R PDR

*AD21*

**Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR26**

**ATTACHMENT 1  
Page 1 of 2**

Southern California Edison  
Company

January 1 to June 30, 1992  
6 Months Ending

San Onofre Nuclear Generating Station  
Location

T.M. Calloway, Mgr., Access Authorization  
Contact Name

(714) 368-9554  
Phone Number

**Cutoffs: Screen/Confirmation (ng/ml)**

|                  |          |                |         |
|------------------|----------|----------------|---------|
| Marijuana        | 50/10    | Barbiturates   | 300/200 |
| Cocaine          | 300/150  | Benzodizaepine | 300/300 |
| Opiates          | 300/300  | Methadone      | 300/200 |
| Amphetamines     | 1000/500 | Propoxyphene   | 300/200 |
| Methamphetamines | 1000/500 | Phencyclidine  | 25/25   |
| Amphetamine      | /200     | Alcohol (%BAC) | .04     |

| <b>Testing Results</b>                | <b>Employees</b> | <b>Contractor Personnel</b> | <b>Total</b>   |                   |
|---------------------------------------|------------------|-----------------------------|----------------|-------------------|
| Average Number with Unescorted Access | <u>2479</u>      | <u>1392</u>                 | <u>3871</u>    |                   |
| <b>Test Types</b>                     | <b># Tests</b>   | <b># Failures</b>           | <b># Tests</b> | <b># Failures</b> |
| Pre-Badging                           | <u>197</u>       | <u>1</u>                    | <u>966</u>     | <u>12</u>         |
| For Cause                             | <u>1</u>         | <u>0</u>                    | <u>2</u>       | <u>2</u>          |
| Post Accident                         | <u>0</u>         | <u>0</u>                    | <u>0</u>       | <u>0</u>          |
| Random                                | <u>1148</u>      | <u>1</u>                    | <u>838</u>     | <u>3</u>          |
| Follow-Up                             | <u>70</u>        | <u>1</u>                    | <u>82</u>      | <u>1</u>          |
| Other                                 | <u>54</u>        | <u>1</u>                    | <u>26</u>      | <u>0</u>          |
| <b>Total</b>                          | <u>1470</u>      | <u>4</u>                    | <u>1914</u>    | <u>18</u>         |

*See Attachment 3, Figure 1*

**Number of Employees Referred To Mandatory Treatment** 2

**Number of Personnel With Access Restored** Employees 2 Contract 16

**Total Number of Random Tests** 1986 **Random Testing Rate** 51.3%

Random Testing Program Results  
See Attachment 3, Figure 2

| Individuals Tested | 1989 | 1990 | 1991 | 1992 | 1993 |
|--------------------|------|------|------|------|------|
| # Failed           | N/A  | 18   | 12   | 11   | 14   |
| # Tested           | N/A  | 302* | 2422 | 1842 | 2604 |
| % Failed           | N/A  | .7%  | .6%  | .6%  | .5%  |

\* Represents only two months of testing.

BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES

01/01/92 - 06/30/92 Includes multiple submittals/multiple substances detected.

|  | Marijuana |        | Cocaine | Opiate | Amphet | Phencyc | Alcohol | Barb | Benzo | Methadone | Prop | Refusals |
|--|-----------|--------|---------|--------|--------|---------|---------|------|-------|-----------|------|----------|
|  | 100/15    | 50/10* |         |        |        |         |         |      |       |           |      |          |
| Licensee Employees                       | 0         | 1      | 1       | 6      | 0      | 0       | 0       | 3    | 4     | 0         | 5    | 0        |
| Contract Workers                         | 5         | 11     | 3       | 10     | 8      | 0       | 0       | 1    | 7     | 1         | 3    | 1        |
| Totals                                   | 5         | 12     | 4       | 16     | 8      | 0       | 0       | 4    | 11    | 1         | 8    | 1        |
| # on-site presumptive positive           | 11        |        | 4       |        |        |         |         |      |       |           |      |          |
| # certified Lab GC/MS confirmed positive | **12      |        | 4       |        |        |         |         |      |       |           |      |          |
| Confirmation Ratio                       | 109%      |        | 100%    |        |        |         |         |      |       |           |      |          |
| Total                                    | 65        |        |         |        |        |         |         |      |       |           |      |          |

\* If marijuana had been tested at 50/15, results for this reporting period would have been on-site presumptive 11, total confirmed 12, for a confirmation ratio of 109%.

\*\* One sample suspected of adulteration pre-screened on-site just below the cutoff level but was confirmed positive at the off-site NIDA laboratory.

(January 1, 1992 - June 30, 1992 period)

1. There were no temporary suspensions or other administrative actions taken against individuals based upon on-site presumptive positives for marijuana and/or cocaine.
2. A total of nine (9) individuals (6 contract workers and 3 employees) had unescorted protected area access withdrawn for a minimum of 14 days following a substance test failure. Twelve (12) contract workers and one (1) employee were denied unescorted protected area access following pre-badging substance test failures.
3. As a result of test(s) failures, two (2) employees were permanently denied site access and their employment was terminated. A total of four (4) contract workers were permanently denied site access following test failures.
4. There were no transfers of licensee employees to non-nuclear positions (away from the San Onofre site) during this time frame as a result of failed substance tests.
5. Two (2) employees were required to enroll in a treatment program.
6. Two (2) employees and sixteen (16) contract personnel were granted (reinstated) unescorted access with a single test failure on record.
7. The MRO reviewed 21 appeal results and 1 retest (one failure did not have an appeal sample and the original sample was retested) for four (4) employees and eighteen (18) contract workers. In all cases, the original results were confirmed. Each of the 22 individuals were provided with detailed instructions regarding their right to appeal management actions which resulted in access denial. Two (2) of the employees pursued an appeal through the union grievance process and, to date, the management actions have been upheld.
8. There were no identified deficiencies in the Fitness For Duty program. Program modifications were not required during the current reporting period. As a result of an NRC inspection concern, clarification was requested on the 10CFR26, Appendix A, Section 2.7(e)(1) requirement to report results of screening analyses for both the NRC and lower utility cutoff levels at the on-site pre-screening stage. After NRC review, it was concluded that the intent of the rule is not to require initial screening tests by the utility at the site pre-screening stage and reporting of results for both the NRC cutoff levels and the more conservative utility cutoff levels. Only the off-site NIDA laboratory must report the results for NRC cutoff levels and the more conservative utility cutoff levels.

9. Four (4) events were reported to the Commission (3 substance failures and 1 drug find) pursuant to 10 CFR 26 during this reporting period. The text of those reports is duplicated below:

- A. A non-emergency twenty-four hour notification was made on February 5, 1992.

"After being observed to be potentially unfit for duty, a non-SCE employee, who is a Bechtel Supervising Nuclear Maintenance foreman, submitted to a for-cause/impairment test with positive results for alcohol. The employee's protected and vital area unescorted access authorization was immediately terminated based upon results of the breath test positive results at 1814 hours, PST, on February 4, 1992. On the day of the positive test, the individual was reporting for work and had not entered the Protected Area.

"At 0930 hours, PST, on February 5, 1992, following evaluation of records in support of the breath tests results, the test was declared to be a failure. As a result of the failure, the worker's site access has been permanently denied, in accordance with SCE's policy. The individual has been employed on-site by Bechtel Power Corporation since January 22, 1992.

"Unit 1 is currently operating at 93%, Unit 2 is operating at 100%, and Unit 3 is in a refueling outage."

- B. A non-emergency twenty-four hour notification was made on February 27, 1992.

"At 1418 hours, PST, on February 26, 1992, it was determined that a contract worker, who is a Bechtel supervising pipefitter in the maintenance organization at San Onofre assigned to Units 1, 2 and 3, has been confirmed by the Medical Review Officer as having tested positive on a substance screen test. The worker's protected and vital area unescorted access authorization was terminated within ten minutes.

"The individual has worked at SONGS periodically since 1981. He originally failed a substance screen test on 8/21/89, and in accordance with SCE's program, was placed on a periodic monitoring testing program while employed at SONGS.

"The individual has currently been working onsite since January 17, 1992. The substance screen test was part of a periodic monitoring testing program administered on February 20, 1992. The individual's site access has been suspended pending receipt of appeal results.

"Unit 1 is at 93% power, Unit 2 is at 100% power, and Unit 3 is in a refueling outage."

- C. A non-emergency twenty-four notification was made on May 15, 1992.

"A suspect material was discovered in the Protected Area at 13:05 on May 13, 1992. It was located in a generally accessible but remote area on the Unit 3 Safety Equipment Building Roof 50' elevation. The material was discovered by contract personnel while they were performing routine maintenance tasks.

"At 1430 hours PDT, May 14, 1992, an offsite laboratory confirmed that it was a controlled substance, marijuana (the remains of one marijuana cigarette).

"There have been no individuals identified as being responsible for the material.

"Unit 1 was operating at 92% power, Unit 2 was operating at 100% power and Unit 3 was operating at 65% power when the substance was discovered."

- D. A non-emergency twenty-four notification was made on May 20, 1992.

"At 0815 hours, PDT, on May 20, 1992, it was determined, following a Medical Review Officer's review, that an employee, who is a licensed reactor operator assigned to the nuclear training division, had tested positive on a drug screen urinalysis test. The employee's protected and vital area unescorted access authorization was terminated within ten minutes. The individual is a Nuclear Training Instructor and holds a Senior Reactor Operator's license for San Onofre Unit 1, and as such is not presently performing licensed operator duties.

"The employee, who has been employed by Southern California Edison since September 28, 1970, has not previously failed a drug screen urinalysis test. The employee is currently on investigatory suspension, awaiting further management review. The drug screen urinalysis test was administered as part of the random testing program on May 14, 1992.

"Unit 1 was operating at 92%, Unit 2 was at 100%, and Unit 3 was at 65% power when the drug failure determination was made."

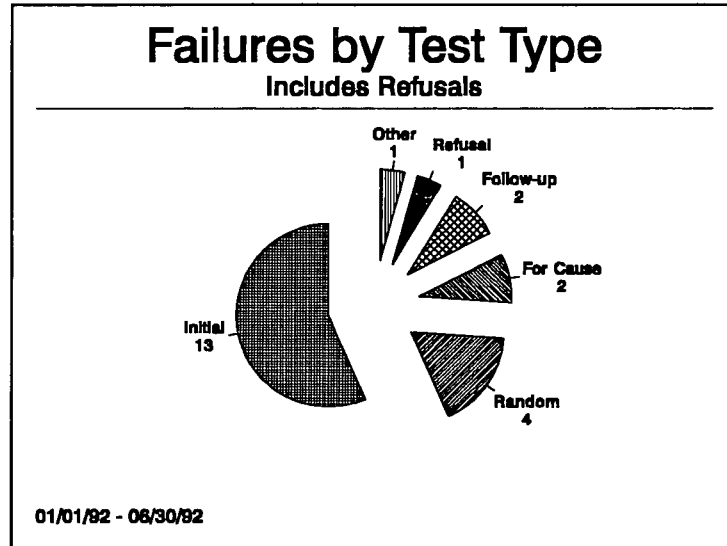


Figure 1

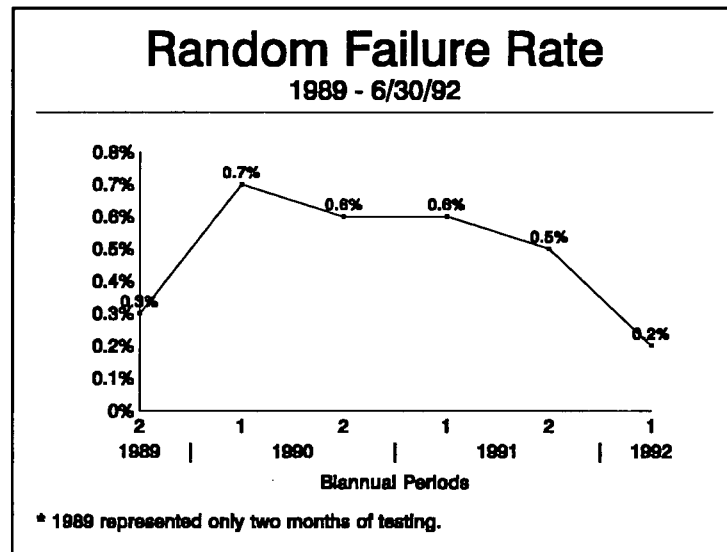


Figure 2