Southern California Edison Company

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February 12, 1996

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

Gentlemen:

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 July 1, 1995 to December 31, 1995 (Attachment 1). Attachment 2 is a summary of information and management actions for the reporting period.

If you require any additional information, please so advise.

Sincerely,

That C. March

Attachments: 10 CFR 26 Performance Data

cc:

L. J. Callan, Regional Administrator, USNRC Region IV

- J. E. Dyer, Director, Division of Reactor Projects, NRC Region IV
- K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
- M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3
- J. A. Sloan, NRC Senior Resident Inspector, Units 1, 2, and 3
- M. K. Webb, NRC Project Manager, San Onofre Unit 1

Louis Carson, Regional Project Inspector, San Onofre Unit 1

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Fitness for Duty Program Performance Data Personnel Subject to 10CFR26 ATTACHMENT 1

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Southern California Edison	<u>July 1, - December 31, 1995</u>
Company	6 Months Ending
San Onofre Nuclear Generating Station	
S.L. Blue; Administrator, Fitness For Du Contact Name	ty (714) 368-2482 Phone Number

Cutoffs: Screen/Confirmation (ng/ml)

Marijuana50/Cocaine300/1Opiates300/3Amphetamines1000/5Methamphetamine1000/5Amphetamine/2	50 Benzodiazepine 00 Methadone 00 Propoxyphene	300/200 300/300 300/200 300/200 25/25 .04
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Testing Results	SCE Employee	s Contrac	tor Personn	el Total
Average Number with Unescorted Access	2075		1156	3231
Test Types	# Tests	# Failures	# Tests	# Failures
Pre-Badging	155	2	1005	29
For Cause	1	0	3_	1
Post Accident	0	0	0_	0
Random	476	2	283	4
Follow-Up	22	0	42	0
Other	16	1	1	0
Total	670	5	1334	34

Number of Employees Referred To Mandatory Treatment __2____ Number of Personnel With Access Restored Employees __0_ Contract __7___ Total Number of Random Tests_759 Random Testing Rate_23.48% Annual Statistics, Total Random Tests_1711 Random Testing Rate 52.27%

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Table 1, RANDOM TESTING PROGRAM RESULTS

Individuals Tested	19	91	1992		1993		1994		1995	
# Failed	11	14	4	4	10	15	2	1	4	6
# Tested	1771	2604	1986	1890	1947	2148	996	701	952	759
% Failed	. 6%	.5%	.2%	.2%	.5%	.7%	.2%	.2%	. 4%	.8%

Table 2, BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES Includes multiple submittals/substances detected.

	Marijuana		сос	OPI	AMP	ЕТОН	BARB	BENZ	PCP	PROP	7	
	100/15a	50/10 <i>b</i>				7						
Licensee Employees	0	1	3	7	3	1	1	4	0	2		
Contract Workers	14	20	4	6	8	2	4	3	1	5	TOTAL	
Totals	14	21	7	13	11	3	5	7	1	7	75	
#Onsite Presumptive	n/a	20 <i>c</i>	6 <i>C</i>	a - NRC Levels b - SCE Levels c - One THC and one cocaine sample pre-screened negative and								
# Certified Lab	n/a	21	7	reported positive at or near cut-off levels. d - If marijuana had been tested at 50/15, results for this								
Confirmation Ratio	n/a	95%d	86%	reporting period would have been; on-site presumptive 20, total confirmed 21 for a confirmation ratio of 86%.								

Table 3, BREAKDOWN OF ALL CONFIRMED POSITIVE TESTS CAUSING FAILURES

	тнс	METH	сос	PCP	OPI	BARB	ЕТОН	
Licensee Employees	1	1	2	0	0	0	1	
Contract Workers	17	6 [.]	3	1	4	1	2	Total
Total	18	7	5	1	4	1	3	39

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(July 1, 1995 - December 31, 1995)

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- 1. There were no temporary suspensions or other administrative actions taken against individuals based upon on-site presumptive positives for marijuana or cocaine.
- 2. A total of thirty eight (38) individuals (4 employees and 34 contract workers) had unescorted protected area access withdrawn for a minimum of 80 work hours following a substance test failure.

Two (2) employees and four (4) contract workers failed random tests. One (1) employee and one (1) temporary employee (employment was terminated) and twenty-nine (29) contract workers were denied unescorted protected area access following a pre-badging substance test failure. One (1) contract worker was permanently denied unescorted protected area access after failing a For Cause test. One (1) employee was permanently denied unescorted protected area access after failing a Post-Suspension test. This was the second failure for this employee during this period (the first was a pre-badging failure) and employment was terminated.

- 3. There were three (3) disciplinary suspensions from employment during the reporting period.
- 4. There were no transfers of licensee employees to nonnuclear positions (away from the San Onofre site) as a result of failed substance tests.
- 5. Three (3) individuals were required to enroll in a treatment program during this period.
- 6. Seven (7) contract workers were granted (reinstated) unescorted access with a single test failure on record.
- 7. The MRO reviewed a total of twenty eight (28) appeal results for five (5) employees and twenty three (23) contract workers. The original test results were confirmed. These individuals were provided with detailed instructions regarding their rights to appeal management actions which resulted in access denial. Eleven (11) contract workers left site prior to meeting with the MRO, resulting in non-contact positive tests.

Sixteen (16) workers appealed denial of access for a test failure, management actions were upheld.

8. There were no identified deficiencies in the Fitness For Duty program.

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As depicted in Table 2, there were 75 samples confirmed by the lab as positive. As shown in Table 3, only 39 individuals were associated with MRO failed test declarations. Due to the SCE recollection procedure, several individuals submitted multiple positive samples resulting in a single declared individual failure. Positive tests for prescription medications were declared responsible use by the MRO with the exception of the noncontact positive tests.

In reconciling THC results, one sample pre-screened negative for THC while the HHS lab analysis was positive. Although a negative pre-screen result for THC was obtained, the sample was sent for off-site analysis (presumptive positive for a prescription drug) and tested positive at the off-site lab for THC just above the cutoff level.

In investigating the THC discrepancy, the HHS lab and on-site pre-screening utilized different EIA reagents for the detection of marijuana metabolites. Due to slight differences in sensitivity of the reagents used, in concert with a borderline positive sample, the results were technically acceptable. On-site pre-screening results and test protocol were verified and found to be accurate and consistent with the testing protocol. The appeal sample sent to a second HHS (appeal) lab, confirmed the positive results. The split sample (appeal) was screened at the second HHS lab utilizing the same EIA reagent as on-site pre-screening and a negative screening result was obtained.

In reconciling cocaine results, one individual submitted multiple samples and in accordance with site program procedures the initial sample was screened for any detectable level. This sample pre-screened negative but was reported positive by the HHS lab at or near the cut-off level. A subsequent sample from this individual prescreened and was reported positive by the HHS lab.

10. During this period there were no reportable events to the Commission.

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