

August 24, 1998

U. S. Nuclear Regulatory Commission Document Control Desk Washington, DC 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 and 3

Pursuant to 10 CFR 26.71(d), this submittal provides the required semiannual Fitness For Duty program performance data for the period of January 1, 1998 to June 30, 1998 (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,

G. T. Gibson

Manager, Compliance

Attachments: 10 CFR 26 Performance Data

cc: w/ enclosures

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Fitness for Duty Program Performance Data Personnel Subject to 10CFR26

Southern California Ed	lison	<u>January</u>	1 - June 3	0, 1998
Company			6 Months	Ending
San Onofre Nuclear Gen	erating Stat	ion		
Location				
S.L. Blue; Supervisor,	Fitness For	Duty	(949) 368-	2482
Contact Name			Phone Nur	mber
Cutoffs: Screen/Co	onfirmation (ng/ml)		
Marijuana	50/10 Barb	iturates	300/200	
		odiazepine	300/300	
	•	adone oxyphene	300/200 300/200	
→		cyclidine	25/25	
Amphetamine		hol (%BAC)	.04	
Testing Results	SCE Employ		tor Personn rt term onl	
Average Number wit Unescorted Access	1861		32	_2593
Categories	# Tests	# Failures	# Tests	# Failures
Pre-Access	_134	0	867	9
For Cause: Observed Behavior Post Accident	3	<u>0</u>	4	0 0
Random	512	2	157	0
Follow-Up	24	1	28_	0
Other	38	0	40	0
Total	711	3	1096_	9

Tota

47

Table 1, RANDOM TESTING PROGRAM RESULTS

Individuals Tested	199	94	1	1995	199	96	19	97	1998
# Failed	2	1	4	6	0	5	3	2	2
# Tested	996	701	952	759	632	735	838	601	669
% Failed	0.2%	0.2%	0.4%	0.8%	0.0%	0.7%	0.4%	0.3%	0.3%

Table 2, BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES

Includes multiple submittals/substances detected.

		111011	deles multiple	, strommine	3, B110 3101110	
	Marijı	iana	СОС	AMP	BAR	BENZ
	100/15a	50/10 <i>b</i>				
Licensee Employees	. 0	0	2	2	3	4
Contract Workers	6	8	0	6	2	3
Totals	6	8	2	8	5	7
#Onsite Presumptive	n/a	6 <i>c</i>	2	LE .	Levels b	
# Certified Lab	n/a	8	2	c-Two THC samples press positive at or near the c levels		
Confirmation Ratio	n/a	75%	100%	ieveis		

E Levels

escreened negative and reported e cut-off

OPI

5

8

PROP

5

METH

0

ETOH

3

Table 3, BREAKDOWN OF ALL CONFIRMED POSITIVE TESTS CAUSING FAILURES

	Marijuana	Cocaine	Methamphetamine	Alcohol	
Licensee Employees	0	1	0	2	
Contract Workers	5	0	3	1	Total
Total	5	1	3	3	12

(January 1 - June 30, 1998)

- 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 eleven (11) individuals [two (2) employees and nine (9) contract workers] had unescorted protected area access withdrawn for a minimum of 80 work hours following a substance test failure.
 - Nine (9) contract workers were denied unescorted protected area access following a pre-badging substance test failure.
 - One (1) employee failed a random test and had unescorted protected area access withdrawn for a minimum of 80 work hours. One (1) employee was permanently denied unescorted protected area access after failing a random test. This was the second test failure for this employee and employment was terminated.
 - One (1) employee failed a follow-up test and had unescorted protected area access withdrawn for a minimum of 80 work hours.
- 3. There were two (2) disciplinary suspensions from employment during the reporting period.
- 4. There were no transfers of licensee employees to non-nuclear positions (away from the San Onofre site) as a result of failed substance tests.
- 5. Two (2) employees were required to enroll in a treatment program during this period.
- 6. One (1) employee and two (2) contract worker were granted (reinstated) unescorted access with a single test failure on record.
- 7. The MRO reviewed a total of eight (8) appeal results [three (3) employees, five (5) 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. Three (3) contract workers left site prior to meeting with the MRO, resulting in non-contact positive tests.
 - Two (2) workers pursued appeals through the management review process and are considered eligible for site and protected area access (reinstatement).
- 8. There were no identified deficiencies in the Fitness For Duty program.
- 9. As depicted in *Table 2*, there were (47) samples confirmed by the lab as positive. As shown in Table 3, only twelve (12) individuals were associated with MRO failed test declarations. Due to 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.

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In reconciling THC discrepancies, it was noted that two (2) samples prescreened negative for THC while the HHS lab analysis was positive. Although a negative prescreen result for THC was obtained, all samples were sent for off-site analysis in accordance with Site program procedures for samples submitted as multiple collections.

In investigating THC discrepancies, both HHS labs and on-site prescreening utilized different EIA reagents for the detection of marijuana metabolites. Due to slight differences in sensitivity of the reagents used, in concert with borderline positive samples, the results were technically acceptable. Appeal samples sent to a second HHS (appeal) lab confirmed the positive results.

- 10. During this period there were two reportable events to the Commission.
 - 1. On March 16, 1998, Southern California Edison (SCE) Company made a one hour telephone notification to the NRC Operations Center in accordance with 10 CFR 73, Appendix G.I.(b), upon learning of an actual entry of an unauthorized person into the protected area. It was determined that a Protected Area (PA) unescorted access badge had been inappropriately issued to a non-SCE contract worker on 3/9/98 before drug screening test results were received.

The worker entered the PA on 3/10/98, and was escorted out of the PA approximately 2 ½ hours later. The Central Alarm Station was immediately contacted to deactivate the worker's Security badge.

A required 30 day follow-up License Event Report (LER) was submitted on April 8, 1998.

2. On June 4, 1998 a licensed operator (Control Room Supervisor) tested positive for alcohol. SCE immediately terminated the Operator's access to the protected area and placed the Operator on administrative leave pending an appeal.

On June 9, 1998, SCE made a telephone notification to the NRC Operations Center in accordance with 10 CFR 26.73(a)(2), upon confirming a positive blood test appeal.

The Operator's employment with SCE was terminated.

CATEGORY 1

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