



Southern California Edison Company

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January 3, 1990

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

Dear Sir or Madam:

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

Reference: Final Rule Fitness-For-Duty Programs, 10 CFR 26.73(d)

This letter provides 1) certification that Southern California Edison (SCE) has implemented a fitness-for-duty program at San Onofre which meets the requirements of 10 CFR Part 26 and 2) a listing of substances and cut-off levels more stringent than required by 10 CFR 26. This certification and list of substances/cut-off levels are required by 10 CFR 26.73(d).

SCE has had a drug testing program, including an employee assistance program, in place at San Onofre since September 1984. During 1989 relatively minor changes were made to the SCE program to bring it into full compliance with 10 CFR 26. Full compliance with 10 CFR 26 was verified by SCE through an independent audit which was completed on December 20, 1989. The only item identified for clarification from the independent audit was compliance with 10 CFR 26.23. 10 CFR 26.23 is satisfied by SCE's policy that all contractors and vendors who perform work within the scope of 10 CFR 26 at San Onofre fall completely within SCE's fitness for duty program. In addition, for those contractors and vendors currently performing work within the scope of 10 CFR 26 at San Onofre, notifications were sent which informed them of changes in SCE's fitness for duty program. For those with which SCE has a contract, contract changes incorporating 10 CFR 26.23 requirements were initiated which require written acceptance. Written acceptances of these contract changes are expected by the end of February 1990.

The testing program includes screening for all substances required by 10 CFR 26 Appendix A (Guidelines For Nuclear Power Plant Drug And Alcohol Testing Programs), Section 2.1 and several additional substances. Further, the cut-off levels used to determine a positive test result for screened

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January 3, 1990

substances for both initial and confirmatory tests meet or are more stringent than required by Sections 2.7(e) and (f) of the NRC guideline. Enclosures 1 and 2 provide a listing of substances screened by the San Onofre fitness-for-duty program and a comparison to the 10 CFR 26 cut-off levels for initial and confirmation tests, respectively.

If you have any questions or need additional information on the San Onofre fitness-for-duty program, please let me know.

Very truly yours,



Enclosures

cc: J. B. Martin, Regional Administrator, NRC Region V
C. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

ENCLOSURE 1

SONGS SUBSTANCE SCREENING AND 10 CFR 26 CUT-OFF LEVELS
INITIAL TEST CUT-OFF LEVELS (NG/ML)

ANALYTE	SONGS	10 CFR 26
AMPHETAMINES	1,000	1,000
BARBITURATES		
Amobarbital	2,000	N/A
Butabarbital	1,000	N/A
Butalbital	3,000	N/A
Pentobarbital	1,000	N/A
Secobarbital	300	N/A
Phenobarbital	3,000	N/A
MARIJUANA METABOLITES	50	100
COCAINE METABOLITES	300	300
OPIATES METABOLITES	300	300
PHENCYCLIDINE	25	25
BENZODIAZEPINE	300	N/A
METHADONE	300	N/A
METHAQUALONE	300	N/A
PROPOXYPHENE	300	N/A
ALCOHOL	0.04% BAC	0.04% BAC

ENCLOSURE 2

SONGS SUBSTANCE SCREENING AND 10 CFR 26 CUT-OFF LEVELS
 CONFIRMATION TEST CUT-OFF LEVELS (NG/ML)

ANALYTE	SONGS	10 CFR 26
AMPHETAMINES		
Amphetamine	500	500
Methamphetamine	500	500
BARBITURATES		
Amobarbital	200	N/A
Butabarbital	200	N/A
Butalbital	200	N/A
Pentobarbital	200	N/A
Secobarbital	200	N/A
Phenobarbital	200	N/A
MARIJUANA METABOLITE*	10	15
COCAINE METABOLITE**	150	150
OPIATES		
Morphine	150	300
Codeine	150	300
PHENCYCLIDINE	25	25
BENZODIAZEPINE	300	N/A
METHADONE	200	N/A
METHAQUALONE	200	N/A
PROPOXYPHENE	200	N/A
ALCOHOL	0.04% BAC	0.04% BAC

* Delta-9-tetrahydrocannabinol-9-carboxylic acid.

** Benzoyllecgonine.