



**Southern California Edison Company**

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MANAGER OF NUCLEAR LICENSING

June 29, 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: January 3, 1990 letter from R. M. Rosenblum (SCE)  
to Document Control Desk (NRC). Subject: Same as above.

This letter provides the following corrections and supplemental information to the referenced Fitness For Duty (FFD) certification letter:

1. Correction of an FFD drug confirmation test cut-off level
2. Correction concerning the written acceptances of contract changes incorporating 26.23 requirements from contractors performing work within the scope of 10 CFR 26 at San Onofre
3. Clarification that Southern California Edison (SCE) uses results of initial drug and alcohol tests and "suitable inquiries" received from other licensees with certified FFD programs.

Confirmation Test Cut-Off Level

SCE provided the San Onofre drug test cut-off levels in the referenced certification letter. However, because of a typographical error in Enclosure 2 of the referenced letter, the confirmation test cut-off level for opiates (morphine and codeine) was shown as 150 ng/ml instead of the actual 300 ng/ml which is the same as the cut-off level prescribed in 10 CFR 26. Accordingly, enclosed is a corrected listing of substances screened by the San Onofre FFD program and comparison to the 10 CFR 26 cut-off levels for confirmation tests.

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Acceptance of Contract Changes

In the above reference SCE stated the following:

"... 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."

We based this statement on 50 contractors who were identified as performing activities within the scope of 10 CFR 26 at San Onofre during November 1989. SCE sent notifications and contract changes to these contractors, and those contractors still requiring unescorted access returned their acceptances by the end of February 1990.

After the January 3, 1990 letter was sent, SCE identified additional contractors whose employees were authorized to perform activities within the scope of 10 CFR 26 at San Onofre. We have received written responsibility acceptances as required by 10 CFR 26 from all but two of these additional contractors, and these two outstanding acceptances have been requested and are expected by July 31, 1990.

As evidenced above by our identification of these additional contractors requiring FFD agreements, we recognize that obtaining these written agreements will be an ongoing process, and no further updating will be made to the NRC on this subject unless programmatic problems are encountered.

Regarding programmatic solutions to obtaining the required FFD agreements, we have recently implemented procedures to obtain the required FFD written agreements as part of the supplier qualification process. This is normally accomplished before protected area access is granted to employees of the affected supplier. In addition, for contractors and vendors who have previously completed the supplier qualification process but have not yet provided the required FFD agreement, if their employee requests unescorted access the site access authorization process will, by July 31, 1990, identify the need for this contractor agreement. This contractor agreement would then be obtained through our procurement process. Exceptions to the above procedures will be evaluated on an individual case basis.

Based on a telephone call on May 23, 1990 with Mr. Loren Bush of the NRC, it is our understanding that obtaining written agreements from contractors and vendors is not an access control requirement. These written agreements may be obtained in a reasonable time after unescorted access has been granted as long as each individual granted unescorted access has signed an understanding of what FFD compliance is expected and what consequences will result from lack of compliance to the FFD policy.

All contractor and vendor personnel with unescorted access who perform work within the scope of 10 CFR 26 at San Onofre fall completely within the SCE FFD program. These personnel complete the following requirements prior to authorization for unescorted access:

1. Attend an approximately two hour initial FFD training class
2. Complete a test at the end of the initial FFD training class with a check for understanding
3. Receive a copy of SCE's FFD policy and sign an acknowledgment receipt.

During the training class and in our FFD policy it is clearly stated what FFD compliance is expected and what consequences will result from lack of compliance. Therefore, the required written agreements will be obtained from contractor and vendor corporate offices, but unescorted access for individuals will not be denied based on lack of receipt of this written agreement from the corporation.

#### Initial Drug and Alcohol Tests and Suitable Inquiry

During telephone calls with Mr. Bush of the NRC on February 15, 1990, and with Mr. Bush and Mr. Lawrence Kokajko (NRC San Onofre Units 2 and 3 Project Manager) on February 22, 1990, the NRC accepted SCE's use of pre-access drug and alcohol tests and suitable inquiries based on the following documentation:

1. SCE will use the results of drug and alcohol tests performed by another licensee as screening tools when documentation has been received that both:
  - a. The applicant has been continuously covered and has been in good standing with the other licensee's FFD program within the past 60 days, and
  - b. The other licensee has submitted a certification letter to the NRC that their FFD program complies with 10 CFR 26.
2. SCE will need documentation of the following items in addition to 1.a. and 1.b. above to use a suitable inquiry performed by another licensee:
  - a. Confirmation that the suitable inquiry was performed in conformance with 10 CFR 26, and
  - b. Confirmation that the results of the suitable inquiry are fully disclosed to SCE.

Based on the telephone discussions with the NRC, SCE understands that receipt of this formal documentation from the other licensee is an adequate basis to take credit for the pre-access drug and alcohol tests or suitable inquiry performed by them. Therefore, SCE does not need to review and approve the other licensee's FFD program.

Even though SCE will be taking credit for drug and alcohol tests and suitable inquiries performed by other licensees, we understand that we are accountable to the NRC for the acceptability and completeness of all drug and alcohol tests and suitable inquiries used to permit access to San Onofre. Further, as stated above, SCE complies with 10 CFR 26.23 for all contractor and vendor employees performing activities within the scope of 10 CFR 26 at San Onofre by including them directly in SCE's FFD program.

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

Very truly yours,

A handwritten signature in black ink, appearing to read "J. B. Martin", written over the typed name "J. B. Martin".

Enclosure

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

ENCLOSURE

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	300	300
Codeine	300	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

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

\*\* Benzoylecgonine.

Revision 1