



**Southern California Edison Company**

P. O. BOX 128

SAN CLEMENTE, CALIFORNIA 92674-0128

**August 18, 1995**

WALTER C. MARSH  
MANAGER OF NUCLEAR REGULATORY AFFAIRS

TELEPHONE  
(714) 368-7501

U. S. Nuclear Regulatory Commission  
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 and 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, 1995 to June 30, 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,

Attachments: 10CFR26 Performance Data

cc: L. J. Callan, Regional Administrator, NRC 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  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3  
M. B. Fields, NRC Project Manager, San Onofre Units 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  
Page 1 of 2**

Southern California Edison

Company

January 1, - June 30, 1995

6 Months Ending

San Onofre Nuclear Generating Station

Location

S.L. Blue; Administrator, Fitness For Duty

Contact Name

(714) 368-2482

Phone Number

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

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

Testing Results	SCE Employees	Contractor Personnel	Total
Average Number with Unescorted Access	<u>2191</u>	<u>1116</u>	<u>3307</u>
Test Types	# Tests	# Failures	# Tests    # Failures
Pre-Badging	<u>324</u>	<u>3</u>	<u>1641</u> <u>28</u>
For Cause	<u>3</u>	<u>1</u>	<u>2</u> <u>1</u>
Post Accident	<u>0</u>	<u>0</u>	<u>0</u> <u>0</u>
Random	<u>584</u>	<u>1</u>	<u>368</u> <u>3</u>
Follow-Up	<u>15</u>	<u>0</u>	<u>24</u> <u>0</u>
Other	<u>31</u>	<u>0</u>	<u>9</u> <u>0</u>
Total	<u>957</u>	<u>5</u>	<u>2044</u> <u>32</u>

Number of Employees Referred To Mandatory Treatment 0

Number of Personnel With Access Restored    Employees 0    Contract 8

Total Number of Random Tests 952    Random Testing Rate 28.78%

Table 1, RANDOM TESTING PROGRAM RESULTS

Individuals Tested	1990	1991		1992		1993		1994		1995
# Failed	12	11	14	4	4	10	15	2	1	4
# Tested	1842	1771	2604	1986	1890	1947	2148	996	701	952
% Failed	.6%	.6%	.5%	.2%	.2%	.5%	.7%	.2%	.2%	.4%

Table 2, BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES

Includes multiple submittals/substances detected.

Includes Multiple Submittals/Substances detected:

	Marijuana		COCA	OPIT	AMPH	ETOH	BARB	BENZ	METH ADONE	PROP	TOTAL	
	100/15a	50/10b										
Licensee Employees	4	4	0	11	0	0	10	3	0	2		
Contract Workers	13	18	4	9	15	3	1	6	1	6		
Totals	17	22	4	20	15	3	11	9	1	8		93
#OnSite	N/A	22	4	a - NRC Levels   b - SCE Levels c - If marijuana had been tested at 50/15, results for this reporting period would have been; on-site presumptive 22 total confirmed 22 or a confirmation ratio of 100%.								
# Certified Lab	N/A	22	4									
Confirmation Ratio	N/A	100%c	100%									

Table 3, BREAKDOWN OF ALL CONFIRMED POSITIVE TESTS CAUSING FAILURES

	THC	METH	COC	TEST SUBVERSION	BARB	ETOH	Total
Licensee Employees	4	0	0	0	1a	0	37
Contract Workers	13	10	4	2	0	3	
Total	17	10	4	2	1	3	

a - Temporary employee departed site prior to meeting with the MRO. Considered a Non-Contact positive.

(January 1, 1995 - June 30, 1995)

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 seven (37) individuals (5 employees and 32 contract workers) had unescorted protected area access withdrawn for a minimum of 80 work hours following a substance test failure. One (1) employee and three (3) contract workers failed random tests. Three (3) temporary employees (employment was terminated) and twenty-six (26) contract workers were denied unescorted protected area access following a pre-badging substance test failure. One (1) employee and one (1) contract worker were permanently denied unescorted protected area access after failing a For Cause test.

Two (2) contract workers were permanently denied unescorted protected area access when attempts at subversion were detected during pre-badging tests. One sample was reported by the off site laboratory as containing no creatinine level. In the other urine sample, the strong odor of chlorine was present (this sample was also positive for an illegal substance).

3. There were no disciplinary suspension 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. No individuals were required to enroll in a treatment program during this period.
6. Eight (8) contract workers were granted (reinstated) unescorted access with a single test failure on record.
7. The MRO reviewed a total of thirty seven (37) appeal results for five (5) employees and thirty two (32) 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.

Seven (7) workers pursued appeals through the management review process. Three (3) workers appealed the denial of access for a test failure, the management action was upheld. Four (4) workers were considered eligible (reinstatements) for site and protected area access.

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

9. As depicted in Table 2, there were ninety three (93) samples confirmed by the lab as positive. As shown in Table 3, only thirty seven (37) 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 one (1) non-contact positive.

10. Events reported to the Commission during this period;

A. DESCRIPTION OF THE EVENTS:

Plant: San Onofre Nuclear Generating Station, Units 1, 2, and 3  
Reactor Vendor: Combustion Engineering  
Discovery Date: January 31, 1995  
Mode: Unit 1, Safestor  
Unit 2, Mode 1, 98% reactor power  
Unit 3, Mode 1, 97% reactor power

On January 31, 1995, at 0701, an individual (non-utility, non-licensed) was allowed to enter the protected area (PA) before all portions of Edison's unescorted access screening process had been completed (drug test results not evaluated). The individual's supervisor was notified that a meeting between this individual and the Medical Review Officer (MRO) was required. The supervisor accompanied the individual out of the PA at 0844. At 0955, the MRO evaluated the individual's initial drug screening test results and concluded the individual failed the drug screening test. Edison deactivated this individual's security badge at 1000.

As a result of this event, Edison initiated a selective review of access clearance records. On February 7, 1995, it was discovered that a second individual had been granted unescorted access (granted on 1/26/95) prior to drug test results being evaluated. Edison deactivated the second individual's security badge at 1348, on February 7, 1995. A records review determined individual #2 did not enter the PA. The MRO declared a drug screening test failure on February 8, 1995 at 1105 hours.

Upon discovery of the second incident (on 2/7/95), Edison initiated a 100% validation of documentation for all personnel requesting unescorted access submitted from 11/28/94 (start of outage badging) through 1/31/95. The results of this validation revealed a third instance of premature access authorization (granted on 1/9/95). Records indicate individual #3 did not enter the PA, and there was no drug screening failure declared in this third incident.

In accordance with the requirements of 10CFR73.71(b), Edison reported the first two occurrences by telephone (NRC Log Event

No. 28309) at 1150 on January 31, 1995, and (NRC Log Event No. 20354) at 1243 on February 8, 1995, respectively. Edison is providing this 30 day follow-up report in accordance with 10CFR73.71(d).

#### CAUSE OF THE EVENT:

The cause of the event was personnel inattention to detail by the clerk processing the access authorization documents, and a failure to exercise due diligence in follow-up processing by the supervisor.

#### CORRECTIVE ACTIONS:

Upon discovery of the first event (1/31/95), Edison re-emphasized to the clerk and supervisor the importance of attention to detail. Edison clarified the access authorization worksheet and initiated a 25% validation audit of documentation for all personnel requesting unescorted access submitted from 1/3/95 through 1/31/95 to ensure the records documented a passing drug test result.

Upon discovery of the second and third events (2/7/95), Edison expanded our records audit to 100% of all personnel request for unescorted access submitted from 11/28/94 through 1/31/95. In addition, the clerk was replaced, and additional counseling of the supervisor and access authorization staff was performed.

#### SAFETY SIGNIFICANCE OF THE EVENT:

There is no safety significance to these events as the individual involved with the first incident was with his supervisor at all times while in the PA (except for an approximate 10 minute rest room break) and no vital areas were entered.

As discussed above, the two individuals from the second and third incidents did not enter the PA.

A review of access authorization records indicate that these 3 failures occurred during the pre-outage period (11/28/94 through 1/31/95) when approximately 778 authorizations were being processed.

#### ADDITIONAL INFORMATION:

A search of the LER files yielded no similar event in the last two years.

- B. At approximately 23:45 on January 16, 1995, with both Units at about 97% power, two Fire watch contractors (non-utility, non-licensed) were involved in a physical altercation (exchange of blows) inside a multipurpose lunch room in the Protected Area. The altercation was not related in any way to plant operations or plant safety; rather, it apparently related to Fire watch union accounting/financial matters.

A security officer entered the multipurpose lunch room at the conclusion of the altercation and determined supervisory involvement was required. The Fire watch supervisor arrived independently and immediately escorted individual #1 out of the Protected Area. Individual #1 was transported to Samaritan Hospital and diagnosed with a fractured rib. Edison management directed Security to remove individual #2 from the Protected Area at 01:00 on January 17, 1995.

A security officer and Operations personnel walked down plant areas occupied by the two individuals, from the time of the incident until they were escorted out of the Protected Area, verifying no unauthorized actions had occurred. Security suspended unescorted Protected Area access for both individuals at approximately 01:25 on January 17, 1995. Edison plans to permanently deny plant access for these two individuals.

In accordance with the requirements of 10 CFR 73.71(b), Edison reported this occurrence by telephone (NRC Log Event Number 28247) at 03:00 on January 17, 1995. Edison is providing this 30-day follow-up report in accordance with 10 CFR 73.71(d).

No required Fire watch postings were missed and there was no safety significance to this occurrence. There have been no LERs submitted for similar occurrences in the past three years.