From: Harris, Paul
To: Collins, Jennifer
Cc: Lebard, Mitch; Zaleski, Brian
Subject: RE: Requesting Clarification on result reporting for dilute specimens tested to LOQ
Date: Wednesday, May 13, 2015 8:35:00 AM

Jennifer,

The conduct of an Nuclear Regulatory Commission special analysis test under 10 CFR 26.163(a)(2) is a federally mandated drug test with 26.163(b)(2) detailing that the special analysis result is a laboratory confirmed positive test. The NRC licensee (Arizona Public Services) in this case would have a contractual agreement with you (MedTox) to conduct these tests. A federal CCF (or a licensee provided CCF) would be used to report a laboratory confirmed positive test result.

The CCF should be marked as dilute, laboratory confirmed positive, with the quantitative test result in the remarks.

For this occurrence, marking the CCF as dilute negative would make no sense under 10 CFR Part 26. (Although it would make sense for a DOT and other federally mandated drug test under the HHS Guidelines because, for these entities, they would not test to LOD as a confirmatory cutoff.)

Thank you for asking, I hope this helps.

I will place this email in our NRC official document records system and post it on our external website as a frequently asked question.

Paul

Paul Harris

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From: Collins, Jennifer [mailto:Collij6@labcorp.com]
Sent: Tuesday, May 12, 2015 5:03 PM
To: Harris, Paul
Cc: Lebard, Mitch
Subject: Requesting Clarification on result reporting for dilute specimens tested to LOQ

Hello Paul,

I am requesting clarification on the reporting process for specimens that are negative dilute, tested to LOQ and have drug present based on LOQ testing.

Because the specimen has screened negative at the standard cutoffs, the electronic report for the panel shows negative and dilute. The LOQ testing performed is reported as additional testing with a

quantitative result for the identified analyte. A comment is included indicating that testing has been performed based on specimen validity test results in accordance with 10CFR26 26.163 (a)(2). The corresponding CCF is filled out with the negative and dilute boxes marked and the quantitative result indicated on the remarks line.

One of our licensees, Arizona Public Service Company has indicated that they feel the CCF should be filled out by checking the positive box. Do you have standard guidance for reporting these samples? I can forward an example if needed.

Thanks for your help,
Jennifer

Jennifer A. Collins, Ph.D., F-ABFT
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