

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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Docket Nos. 50-456; 50-457
50-237; 50-249
50-373; 50-374
50-295; 50-304

Licensee: Commonwealth Edison Company
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Inspection At: Corporate Offices, Downers Grove, Illinois, June 11 and 13, 1991
Braidwood, Dresden, LaSalle and Zion Stations on June 12, 1991

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Date

Inspection Summary

Inspection on June 11-13, 1991 (Report Nos. 50-456/91016(DRSS);
No. 50-457/91014(DRSS); No. 50-237/91017(DRSS); No. 50-249/91016(DRSS);
No. 50-373/91012(DRSS); No. 50-374/91011(DRSS); No. 50-295/91013(DRSS);
No. 50-304/91013(DRSS))

Scope: This special, announced inspection reviewed the licensee's Fitness-for-Duty (FFD) program required by 10 CFR Part 26. The review was conducted in accordance with Temporary Instruction (TI)2515/106. Specifically, the inspection included the licensee's drug and alcohol abuse policies and procedures; program administration; employee awareness and understanding of the program; selection and notification for random testing; documentation; sanctions and appeals; audits; specimen collection facilities and procedures; training program; and reported FFD events.

Results: Based on the selective examination of key elements of the licensee's Fitness-for-Duty Program it was concluded that the licensee is satisfying the general performance objectives of 10 CFR 26.10. Several program strengths were identified. Program strengths included the strong management support for the program and the ample number of personnel resources devoted to the corporate and site Fitness-for-Duty staffs.

DETAILS

1. Key Persons Contacted

In addition to the persons listed below, the inspectors interviewed other licensee employees and contractor personnel. The asterisk (*) denotes those present at the Exit Interview conducted on June 13, 1991.

- P. Laird, Director Corporate Security, Commonwealth Edison Company (CECO)
- *G. Toleski, Fitness for Duty (FFD) Program Administrator, CECO
- *R. Haley, Medical Review Officer, CECO
- *R. Van Ham, Industrial Relations Manager, Nuclear Operations, CECO
- D. LaBelle, Coordinator, Employee Assistance Services, CECO
- *E. Pierard, Engineering and Construction, FFD Coordinator, CECO
- *J. Zucchi, FFD Analyst, CECO
- *P. Welsh, Assistant FFD Program Administrator, CECO
- *M. Balster, Engineering and Construction, CECO
- *F. Kanwischer, Services Director-Dresden, CECO
- *A. Torrez, Assistant Security Administrator-Zion, CECO
- *R. Barla, Assistant Security Administrator, LaSalle, CECO
- *R. Mau, Assistant Security Administrator, Braidwood, CECO
- R. Brown, Station FFD Supervisor, Dresden, CECO
- *S. Trubatch, Attorney, Sidley and Austin
- *R. Kyrouac, Nuclear Quality Programs (NPQ) Supervisor, CECO
- J. Mayer, Dresden, Station Security Administrator, CECO
- M. Pluth, Employee Assistance Program Coordinator, Nuclear Station Division, CECO
- G. Diederich, LaSalle Station Manager, CECO
- J. Walkington, LaSalle Service Director, CECO
- R. Morley, Jr., LaSalle Station Security Administrator, CECO
- M. West, LaSalle Industrial Relations Supervisor, CECO
- R. Milne, Zion Station Security Administrator, CECO
- T. Broccolo, Zion Services Director, CECO
- S. Roth, Braidwood Station Security Administrator, CECO

2. Entrance and Exit Interview

At the beginning of the inspection, Mr. Pat Laird and other members of the licensee's staff were advised of the purpose of the visit and the functional areas to be inspected.

The inspectors met with the licensee representatives denoted in Section 1 at the conclusion of the inspection on June 13, 1991, and advised the representatives that the inspection had been a selective examination of their Fitness-for-Duty (FFD) program utilizing TI 2515/106 to determine whether it meets regulatory requirements.

Our review concluded that the FFD program had been adequately developed, implemented and monitored, and was meeting the general performance objectives of 10 CFR 26.10. Additionally, there was an ample number of knowledgeable personnel resources devoted to implementing the program.

The inspectors also pointed out that the Braidwood onsite testing facility, currently under construction, represents a notable program upgrade.

3. Inspection Approach (MC0610)

By letters dated April 3, 1991, the licensee was notified of the dates and scope of this inspection. They were requested to provide the latest revisions of the required FFD policies and procedures, which were reviewed in-office prior to the onsite inspection. The inspectors also reviewed the licensee's semi-annual report of program performance data for the period ending May 31, 1991. The results of the Resident Inspectors' evaluations of the initial training sessions conducted at the Braidwood, Dresden, LaSalle and Zion stations were also reviewed.

Onsite inspection activities included interviews of the key individuals responsible for program implemented and included, for example, the Medical Review Officer, the FFD Program Administrator, the Coordinator - Employee Assistance Program Services, and specimen collection personnel at the Braidwood, Dresden, LaSalle and Zion stations. Additionally, approximately 6 randomly selected personnel, to include supervisors and non-supervisors, were interviewed at each of the four stations.

The inspectors also conducted a tour of the onsite specimen collection facilities at each station. Record storage areas and protective measures at the licensee's corporate office were also reviewed.

Several audit reports, suitable inquiry files and other FFD related records were also reviewed by the inspectors.

4. Written Policies and Procedures (TI 2515/106-05.01C)

The licensee's written policies and procedures were reviewed and compared to the requirements of 10 CFR Part 26 to assure that they were comprehensive and of sufficient clarity and detail to support the implementation of the program. The inspectors had the following observations:

A written comprehensive policy of Fitness-for-Duty was found in Nuclear Operations Policy (NOP)-OA.5 entitled "Commonwealth Edison Fitness-for-Duty Policy" and Corporate Nuclear Security Guideline No. 200 entitled "Commonwealth Edison Fitness for Duty Program." A copy of the policy is distributed to each employee and contractor during General Employee Training. Interviews with employees indicated that the policy was effectively communicated through training.

Written procedures were developed which adequately detail responsibilities for important aspects of the program involving, but not limited to, the treatment of presumptive positive tests, selection and notification of individuals for testing, collection and processing of specimens, and the medical review officer's review of tests and notification.

5. Program Administration (TI 2515/106-05.02a): No violations or unresolved items were identified.

- a. The overall program administration was effectively monitored with several strengths noted. The Fitness-for-Duty Program Administrator was extremely knowledgeable of program requirements, procedural guidance, and interdepartmental responsibilities. The FFD Program Administrator appeared to be an effective focal point to resolve FFD issues and established effective liaison with all nuclear stations and supporting departments. A high level of consistency in FFD program implementation existed between the corporate offices and the licensee's nuclear stations. The assistant FFD Program Administrator also displayed an excellent knowledge of program requirements and functions. The program oversight and monitoring as described above by the FFD staff was considered a program strength.
- b. Program responsibilities are clearly described in the licensee's procedures and major FFD program functions have been appropriately assigned. The FFD program is centralized at the Corporate office, under the Director of Security.
- c. The key FFD staff members have the necessary training and experience to fulfill their program responsibilities. Key members of the licensee's FFD organization were interviewed by the inspectors and found to be very knowledgeable of their responsibilities.
- d. Licensee management support for the FFD program was evident. Corporate level managers and supervisors were assigned program responsibilities. One member of the corporate staff (the FFD Program Administrator) was assigned to perform overall program coordination and monitoring on a full-time basis. The appeals Review Board consists of an impartial, internal management group appointed and chaired by the Senior Vice President for Nuclear Operations or his designee.
- e. The MRO was interviewed by the inspectors on June 11, 1991. He is a licensed physician in the State of Illinois. He has been involved with the licensee's drug and alcohol program since its inception in 1982. In 1990, he attended the "Medical Review Officer Training Course for Urine Drug Testing" sponsored by the American College of Occupational Medicine. The MRO is a full time licensee employee and maintains an office adjacent to the FFD Program Administrator.

The MRO is responsible for determining confirmatory drug test results at or above the cut-off level as positive or negative by evaluation of the disclosures on the consent form, review of medical history of the person tested, verification of prescriptions, and communications with the person tested. This determination is accomplished within 10 days of completion of the initial presumptive positive test. The MRO stated that his evaluation included a review of chain-of-custody documentation.

6. Worker Awareness (TI 2515/106-05.02c):

The inspectors interviewed a total of 24 randomly selected persons, including supervisors, and licensee and contractor employees, 6 at each site. The personnel interviewed generally believed that the FFD selection process for testing was random in nature, in that supervisors could be selected for testing just as frequently as nonsupervisors and that contractors are tested as frequently as company employees. No "Safe periods" for drug abuse were identified in that the personnel believed that random testing could be conducted at any time to include backshifts, weekends, and holidays. The licensee personnel interviewed were familiar with the EAP services available to them and believed such services would be provided in a confidential manner. Contractor personnel interviewed indicated that they were aware of the Commonwealth Edison company "Get Well Program" provided to individuals who are denied access for a violation of the FFD program. Completion of the program could provide them an opportunity to have their eligibility for unescorted access restored.

7. Program Elements (TI 2515/106-05.02c):

a. Selection and Notification for Random Testing

The FFD Program Administrator and site FFD security personnel control the random drug and alcohol testing using procedures identified in the Corporate Nuclear Securities Guidelines. Random testing is conducted at an annual rate equal to at least 100% of all individuals with unescorted access to the protected area and EOF responders. The list of individuals with unescorted access is continuously updated. Personnel are selected in a statistically random manner so that all personnel eligible for testing have an equal probability of being selected. A person completing a random test is immediately eligible for another random test. The percent of workers selected each week from each established pool is sufficient to obtain an average of 2% per week per pool. Testing is administered on at least a weekly frequency and at various times during the day with limits and conditions on the time allowed for personnel to report to the collection site.

Interviews with FFD personnel disclosed that all personnel in the random selection pools are subject to the same testing criteria regardless of frequency of access to the site. Perceptions of safe periods are countered by testing periodically on backshifts, weekends and holidays.

The FFD Program Administrator is responsible for notifying specimen collection personnel and FFD site personnel of the test dates, places, and times in advance of test dates. On test dates, supervisors are contacted with names and times of personnel to be tested. Workers are notified by their supervisor that they have been selected for testing as close as possible to the actual collection time. Personnel failing to report to the collection site at their scheduled time are reported to the FFD coordinator and their immediate supervisor.

Random Selection Reports (RSRs) are produced at printer terminals that are controlled locations and access to the selection reports is limited to FFD staff personnel. The licensee maintains confidentiality of these reports until all testing of personnel on the report has been completed or properly excused from testing based on established criteria. Worker scheduled test dates are completed the day of the selection and workers are not advised of their selection for testing until a few hours before their testing time.

Random Selection Reports (RSRs) may be generated on various days of a week and may also be generated two or more times within a week.

The licensee has contracted with CSM Mobile, Ltd. for collection and testing services. CSM Mobile, Ltd. is located in Lisle, Illinois. The licensee uses Bio-Analytical Technologies, Chicago, Illinois, as their Health and Human Services (HHS) certified laboratory.

The licensee's testing cutoff levels are the same as those listed in 10 CFR Part 26, Appendix A, except for marijuana metabolites for which their test level is 50 ng/ml for the initial sample, which is more conservative than the Regulations. The confirmed test is the same as identified in the regulation.

b. Documentation

The licensee has developed adequate systems for documenting the key elements of the FFD program and for assuring the protection of information. The licensee's policy for limiting access to information to those with a clear need-to-know is identified in Corporate Nuclear Security Guidelines. Selection lists, chain-of-custody forms, tests results, the permanent log, and individual FFD files are carefully protected. The design of the various records is adequate to assure that all relevant information is collected and can be retrieved when needed. An inspection of a sample of the records showed them to be legible and complete. Physical security for the records is adequate. Files are kept in locked cabinets. The FFD program personnel were knowledgeable concerning the data storage requirements outlined in the rule.

c. Sanctions and Appeals

The licensee's Policy and FFD Procedures are consistent with required actions identified in 10 CFR 26. These procedures indicate that the first confirmed positive drug test results in denial of unescorted protected area access for a minimum of 14 days and referral to the Employee Assistance Program (EAP). Any subsequent confirmed positive test results in denial of access for three years. Any individual involved in the sale, use or possession of illegal drugs within the protected area will result in the person's denial of access for five years.

The rule does not identify sanctions for abuse of alcohol, valid prescriptions or over-the-counter drugs. However, impaired workers

are removed from work activities, their access authorization is denied, and mandatory medical review and/or rehabilitation is required prior to reinstatement. Should a person be retained after an initial FFD policy violation, sanctions imposed are in accordance with the rule.

Licensee Employee Assistance Program referral is not provided to contractor personnel, so their drug or alcohol abuse normally results in denial of unescorted access and referral to their employer for whatever actions the employer deems appropriate. The licensee does provide contractors a "get well program" to allow individuals who are denied access for violation of the FFD program an opportunity to have their eligibility for unescorted access restored. The specific "get well" requirements are determined on a case-by-case basis as the individual requests participation in the program. The requirements of the program cover minimum non-eligibility period, rehabilitation program, and follow-up test requirements.

The licensee's appeal process for a positive alcohol or drug determination has been established in procedures and meets or exceeds rule requirements. The MRO notifies the individual of a confirmed positive test results and offers an opportunity to discuss the results prior to notifying the FFD Administrator. The individual is given the opportunity to request that the reserve sample be screened and confirmed by the laboratory.

The licensee has established a Review Board comprised principally of senior management and medical personnel. The Review Board is responsible for overseeing the appeal determinations made by the Director of Corporate Security. At least three CECO management representatives must be present for the Review Board to conduct business and will meet as often as necessary to decide appeals and petitions in a timely manner. The inspectors determined that this appeal process with senior management participation and oversight is a program strength.

d. Audits

The annual audit required by 10 CFR 26.80 was conducted under contract by Bensinger, DuPont and Associates (BDA) between February 22 and March 13, 1990. Dr. Jerry Leiken of Rush Presbyterian St. Luke's Medical Center participated on May 11, 1990. Bensinger, DuPont and Associates audited the overall program, focusing on company policy, implementing procedures and FFD training of licensee and contractor employees. Dr. Leiken audited on-site specimen collection and testing and audited laboratory activities at Bio-Analytical Technologies. In addition to the annual audit, the licensee's Quality Assurance department has performed some administrative and implementation surveillances of the FFD implementation practices. The auditors concluded that the Commonwealth Edison Company FFD program meets or exceeds the requirements outlined in 10 CFR 26 including Appendix A.

The inspectors concluded that the licensee's audits were thorough and were successful in identifying and correcting weaknesses in their FFD program.

8. Specimen Collection Facility (TI 2515/106-05.02d)

On June 12, 1991, the inspectors conducted a tour of the specimen collection facilities at Braidwood, Dresden, LaSalle and Zion Stations. The facilities at Braidwood, Dresden and Zion Stations consisted of converted trailers. The facility at LaSalle consisted of a mobile van. These facilities were adequate in meeting the needs of a collection location. The permanent on site collection facility at Braidwood should be functional at the end of June 1991.

The facilities are routinely locked when not in use and access to the facilities is recorded on a log. Keys to the facilities are controlled and access to them is limited to personnel with FFD related responsibilities. Adequate security measures were observed.

Effective measures were implemented to prevent subversion of specimens. Blueing agent was used in the toilet facility, and the sink area used for hand washing was easily visible to the personnel performing the specimen collection process.

Administrative forms such as chain-of-custody forms and the Permanent Record Book were readily available. Additionally, a locked container was available in the specimen collection facility to store collected specimens.

The inspectors interviewed the collection personnel during a walk-through of the specimen collection process. The collection personnel were knowledgeable of their duties. Personnel were sensitive to the need to prevent potential tampering with the specimen, and the need to conduct the collection in a professional manner that assures the modesty and privacy of the individual being tested.

Interviews with the FFD Program Administrator confirmed that the specimen collection personnel for all sites had background investigations completed using the criteria for unescorted access authorization. The inspectors reviewed approximately 10 randomly selected personnel records for site and corporate collection personnel and found them to be accurate and complete.

9. Training Program (TI 2515/106-05.01a)

The licensee's awareness training conducted prior to the January 3, 1990 effective date of the Rule was reviewed by the Resident Inspectors and evaluated using TI 2515/104. The training was found to be acceptable. During this inspection, a limited sampling of employees and contractors were interviewed and found to be knowledgeable of the FFD Program and their individual responsibilities. The FFD training program is

administered by the licensee's training department. Also noted was the fact that the EAP Services Coordinator has instructed portions of the training program for the purpose of fostering a better understanding and acceptance of the EAP services.

The inspectors reviewed a selected small sample of records to assure that individuals with access to the protected area had received FFD training, and that supervisors had received continuous observation training. It was also determined that a system is in place to identify when refresher training is needed.

All workers interviewed appeared to be generally supportive of the FFD program and its goals. They appeared to have a high level of confidence in the integrity of the onsite collection and testing process and the FFD personnel.

The licensee maintains an Employee Assistance Program (EAP) that is available to all Commonwealth Edison (CECo) employees. Employees are encouraged to use the EAP as needed. A review of usage statistics indicates that employees do make use of the EAP. They appeared confident that their confidentiality would be maintained. Interviews with plant staff indicated both a willingness to use the EAP and a willingness to refer others to the EAP. The licensee has had an EAP program since 1979.

10. Reported FFD Events (TI 2515/106-05.01a)

a. Braidwood Events Reported:

A random test conducted on January 29, 1990, resulted in a confirmed positive test for a licensee supervisor. Unescorted access was denied immediately. This event was reported to USNRC Headquarters on January 30, 1990. Management determined this individual did not direct or perform safety related or licensed activities. After EAP Counseling and evaluation, unescorted access was reinstated, no treatment was recommended. The sanctions imposed were in accordance with the licensee's FFD policy and 10 CFR Part 26.

b. Dresden Events Reported

None.

c. LaSalle Events Reported

- (1) A random test conducted on January 12, 1990, resulted in a confirmed positive test for a contractor supervisor. Unescorted access was denied and this event was reported to the NRC. A work performance evaluation disclosed that this individual did not work on any safety related equipment.
- (2) On April 17, 1991, a random drug test resulted in the identification of a Licensed Operator with a confirmed positive for cocaine. On April 23, 1991, Region III informed the

licensee of an allegation that Control Room Operators use cocaine and could circumvent the Drug Testing Program. The licensee conducted an investigation into the allegation and determined that random drug tests are being conducted on the control room operators and that station employees are not aware when testing will be conducted. There was no evidence developed that control room operators use illegal drugs and have knowledge when random testing will be done. The sanctions imposed on the licensed operator who tested positive were in accordance with the licensee's FFD policy and 10 CFR Part 26. The event was adequately reported to the NRC.

While investigating the above allegation, a random drug test identified a nuclear station supervisory employee, who tested positive for an illegal substance and violated their FFD policy. Unescorted access was denied and this event was reported to the NRC. The sanctions imposed were in accordance with the licensee's FFD policy and 10 CFR Part 26.

In each of the reported events, the licensee conducted a work investigation and concluded that all safety related work performed by the individuals did not disclose any performance concerns.

d. Zion Events Reported

- (1) A random test of a contractor supervisor conducted on May 1, 1990, resulted in a positive test determination. Unescorted access was denied on May 8, 1990, and the event was also reported to the USNRC Headquarters on this date. A work performance investigation concluded that this individual was not engaged in safety related activities.
- (2) On March 19, 1990, a random test produced a positive test result for a licensee supervisor. Unescorted access was denied on March 26, 1990, upon confirmation of the positive test result. USNRC Headquarters was notified on March 26 1990. An investigation disclosed no work performance concerns. EAP Rehabilitation requirements were completed and unescorted access was reinstated with the provision of unannounced follow-up testing.

An unannounced follow-up test of this Licensee supervisor conducted on July 30, 1990, resulted in a confirmed positive test result. USNRC Headquarters was notified on August 3, 1990. An investigation disclosed no work performance concerns. This was the second FFD violation for this individual and resulted in permanent revocation of unescorted access on August 3, 1990.

- (3) On February 10, 1991 a controlled substance was found in the protected area. The licensee denied unescorted access to two individuals for failure to cooperate and lack of truthfulness. USNRC Headquarters was notified on February 11, 1991. The licensee's investigation report of this incident is currently being evaluated by Region III.

Program Performance Data

a. Braidwood

For the period July 1, through December 31, 1990, 409 random tests were conducted on licensee employees. This number combined with 429 similar tests conducted during the first reporting period totaled 838 and produced a random annual test rate of 103% of an average 813 station assigned licensee employees with unescorted access.

For the second reporting period 1990, 250 random tests were conducted on contractor employees. This number combined with 405 similar tests conducted during the first period totaled 655 and produced a random annual test rate of 108% of an average 607 station assigned contractors with unescorted access.

In 1991 for the period of January 1, 1991 through May 31, 1991, the licensee has conducted 384 random tests for licensee employees and 380 tests for contractor employees.

Thirty six positive tests for the reporting period ending June 30, 1990 and the one for the reporting period ending December 31, 1990 resulted in either denial or revocation of the individuals' unescorted access. Additionally, in the period ending June 30, 1990 two revocations of unescorted access resulted after two individuals refused to participate in "For Cause" testing as a result of behavioral observation.

For the period of January 1, 1991 to May 31, 1991, Braidwood had twenty positive tests that resulted in either denial or revocation of the individual's unescorted access.

b. Dresden

Dresden Station, for the period January 3, 1990 to December 31, 1990, 1088 random tests were conducted on station assigned licensee workforce pool averaging 1046 employees. This resulted in a random test rate of 104 percent for 1990. For the same period 765 random tests were conducted in a contractor workforce pool averaging 728 employees. This resulted in a random test rate of 105 percent for the year 1990. Thirty eight positive tests resulted in either denial or revocation of the individual's unescorted access.

For the period January 1, 1991 to May 31, 1991, 494 random tests were conducted on station assigned licensee personnel pool averaging 1069 employees. This resulted in a random test rate of 47 percent. Sixteen positive tests resulted in denial or revocation of individual's unescorted access for the first five months of 1991.

c. LaSalle

For the period July 1, 1990 through December 31, 1990, 439 random tests were conducted on licensee employees. This number combined with 490 similar tests conducted during the first reporting period

totaled 929 and produced a random annual test rate of 102% of an average 914 station assigned licensee employees with unescorted access.

For the second reporting period 1990, 286 random tests were conducted on contractor employees. This number, combined with 468 similar tests conducted during the first period, totaled 754 and produced a random annual test rate of 103% of an average 731 station assigned contractors with unescorted access.

Each of the 33 positive tests resulted in either denial or revocation of the individuals unescorted access.

For the period January 1, 1991 through May 31, 1991, 964 random tests were conducted on licensee and contractor personnel. Each of the 18 positive tests resulted in either denial or revocation of the individuals unescorted access.

The licensee's testing rate and reports appear adequate to meet the requirements of 10 CFR Part 26.

d. Zion

For the period July 1, 1990 through December 31, 1990, 423 random tests were conducted on licensee employees. This number combined with 532 similar tests conducted during the first reporting period totaled 955 and produced a random annual test rate of 112% of an average 853 station assigned licensee employees with unescorted access.

For the second reporting period 1990, 389 random tests were conducted on contractor employees. This number combined with 574 similar tests conducted during the first period totaled 963 and produced a random annual test rate of 115% of an average 840 station assigned contractors with unescorted access.

In 1991 for the period of January 1, 1991 through May 31, 1991, the licensee has conducted 415 random tests for licensee employees and 410 tests for contractor employees. The licensee is 39 tests short of the number needed to achieve the yearly quota for mid-year.

Sixty positive tests for the reporting period ending June 30, 1990 and 11 for the reporting period ending December 31, 1991 resulted in either denial or revocation of the individual's unescorted access. Additionally, the in period ending June 30, 1990, one revocation of unescorted access resulted when an individual refused to participate in "For Cause" testing required due to behavioral observations. Also, unescorted access was denied when an individual failed to report for a test required to receipt of a dilute specimen on a previous test.

For the period of January 1, 1991 to May 31, 1991, Zion had 13 positive tests that resulted in either denial or revocation of the individual's unescorted access.