

## Zaleski, Brian

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**From:** Draper, Cheryl <cdrape1@entergy.com>  
**Sent:** Tuesday, July 19, 2016 2:51 PM  
**To:** Zaleski, Brian  
**Subject:** [External\_Sender] RE: NRC Review - Pilgrim FFD submissions (26.717) - calendar year 2015 [questions]  
**Attachments:** 2015\_SPTF\_Pilgrim\_PNP-2015-12\_ML16055A490.pdf; 2015\_SPTF\_Pilgrim\_PNP-2015-19\_ML16055A498.pdf

Brian-

Please see the attached corrected Single Positive forms. Sorry, we got a little confused with the subversion attempts.

Thank you

*Cheryl Draper  
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600 Rocky Hill Road  
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**From:** Zaleski, Brian [mailto:Brian.Zaleski@nrc.gov]  
**Sent:** Tuesday, July 19, 2016 10:38 AM  
**To:** Draper, Cheryl  
**Subject:** NRC Review - Pilgrim FFD submissions (26.717) - calendar year 2015 [questions]

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Good morning Cheryl,

We completed a receipt review of the FFD forms submitted for Pilgrim for calendar year 2015 drug and alcohol test results. This review helps ensure that the docket is correct to support our inspectors and assessment of industry performance.

We have two items we wanted to follow up with you about. Each form referenced in this email is attached for your reference.

**Item 1 – Reporting of “Substituted” Validity Test results (2 subversion attempts).** Based on the subversion descriptions provided in each Single Positive Test Form (SPTF), the determination that these individuals subverted the testing process does not appear to be based on a laboratory validity test result of “Substituted”, instead, each was based on donor action and information collected at the collection site (donor admission to subversion attempt, donor refused to provide a specimen).

Section 26.161(d) describes a substituted validity test result as the following: “The laboratory shall report a specimen as substituted when the specimen's creatinine concentration is less than 2 mg/dL and its specific gravity is less than or equal to 1.0010, or equal to or greater than 1.0200, on both the initial and confirmatory creatinine tests (i.e., the same colorimetric test may be used to test both aliquots) and on both the initial and confirmatory specific gravity tests (i.e., a refractometer is used to test both aliquots) on two separate aliquots.”

**PNP-2015-12**

- Subversion description "specimen provided had a temperature of 104.7, also plastic tubing was observed by collector along the individuals pant line"
- Subversion attempt checkbox(es):
  - Refused to provide second specimen
  - Specimen temperature (out of range)
  - Specimen paraphernalia identified

[To more accurately reflect this subversion determination, please change "Was this collection refused" to "Yes", given that the donor refused to provide the second specimen]

**PNP-2015-19**

- Subversion description "SPECIMEN TEMP WAS BELOW RANGE, INDIVIDUAL ADMITTED TO HAVING A BOTTLE OF FAKE URINE TO TRY TO SUBVERT THE TEST"
- Subversion attempt checkbox(es): Specimen temperature (out of range)

[To more accurately reflect this subversion determination, please change "Was this collection refused" to "Yes", given that the donor admitted to the attempt to subvert the testing process. The donor admitted to having a bottle of fake urine, did they provide that bottle to you? If so, please update the subversion attempt checkbox for "specimen paraphernalia identified"]

**Item 2 – Mismatch in the Reason for Testing reported for each testing event.** We compare information in the SPTFs submitted and the summary information in the Annual Reporting Form for Drug and Alcohol Test Results (ARF). We identified the following inconsistencies in the Reason for Testing counts:

- 27 SPTFs: 17 Pre-access; 5 Random; 0 Post-Event; 5 Followup
- 27 ARF: 18 Pre-access; 4 Random; 1 Post-Event; 4 Followup  
(attached is a spreadsheet containing the information from the SPTFs)

[Unclear which information may need to be updated so that the Reason for Testing for each event is consistent between the reports provided.]

To update a form, please select the green "Locked" button in the lower left hand corner of the form, unlock the form, select the "Submission Update" checkbox in the upper left hand corner of the form, and make the appropriate corrections. Prior to submission, please ensure that the form is "Validated & Locked".

Thanks for taking a look at our questions and I look forward to hearing back from you. Please call or email if you have questions that I can assist you with.

Brian

**Brian Zaleski** | Fitness For Duty Specialist | 301.287.0638 | office: 3WFN 8A9 | [brian.zaleski@nrc.gov](mailto:brian.zaleski@nrc.gov)  
**U.S. Nuclear Regulatory Commission** | Office of Nuclear Security and Incident Response