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Arizona Public Service Company

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WILLIAM F. CONWAY
EXECUTIVE VICE PRESIDENT
NUCLEAR

161-03782-WFC/MEP/KLMC

February 28, 1991

Docket Nos. STN 50-528/529/530

Document Control Desk
U. S. Nuclear Regulatory Commission
Mail Station P1-37
Washington, D. C. 20555

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Fitness-for-Duty Semiannual Performance Report
File: 91-056-026

Pursuant to 10 CFR 26.71(d), the attachment to this letter provides the Arizona Public Service (APS) Fitness-for-Duty Semiannual Performance Report for the period of July 1990 through December 1990.

If you have any questions concerning this matter, contact Michael E. Powell at (602) 340-4981.

Sincerely,



WFC/MEP/KLMC

Attachment

cc: J. B. Martin
L. L. Bush
D. H. Coe
A. C. Gehr
A. H. Gutterman

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ARIZONA PUBLIC SERVICE COMPANY

FITNESS-FOR-DUTY PROGRAM
SEMIANNUAL PERFORMANCE REPORT

July 1990 through December 1990

INTRODUCTION

APS' year-end statistics have continued to demonstrate that the Fitness-for-Duty Program has been successful in maintaining a drug-free work place. During 1990, APS performed 4,151 random drug and alcohol tests. This yields a testing rate of 116 percent for the average population with unescorted access. APS credits a major portion of its success to an extensive communication and training program. The cooperation between APS and its contractor companies has contributed significantly to the success of the program.

ANALYSIS OF PROGRAM RESULTS

We have performed a statistical breakdown of the confirmed positive drug test results by type of test and type of drug involved. The results of this statistical breakdown are as follows:

Pre-Badge Testing:

Marijuana	3
Cocaine	3
Alcohol	1
Total	<u>7</u> confirmed positive test results

Comments: A total of 980 individuals were pre-badge tested. Of the seven persons with positive test results, one was an APS employee, and the other six were contractor employees. The positive rate for this reporting period (0.7%) is significantly lower than the previous reporting period (1.1%).

For-Cause Testing:

Alcohol	2
Marijuana	1
Total	<u>3</u> confirmed positive test results

Comments: APS tested 11 individuals for-cause during this reporting period. The causes involved behavioral observations, allegations and suspected adulteration of urine specimens, Two positive alcohol test results involved APS employees, and the positive marijuana drug test result was from a contractor employee.

FFD Program Semiannual Performance Report
July 1990 through December 1990
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Random Testing:

Cocaine	3
Amphetamine*	3
Marijuana*	4
Total	<hr/> 10 confirmed positive test results

* One individual tested positive for both amphetamine and marijuana.

Comments: 2,109 individuals were tested during this reporting period which yielded an annualized testing rate of 124 percent. Of the nine individuals testing positive, four were APS employees, and five were contractor employees. Eight out of the nine tested positive on their first random test, and one individual tested positive after the second random test (one month after the first test). This one individual tested positive for cocaine. In comparison with the statistics from the previous reporting period, marijuana and amphetamine positives increased by four and two respectively, with one individual testing positive for both amphetamine and marijuana.

Post Accident Testing:

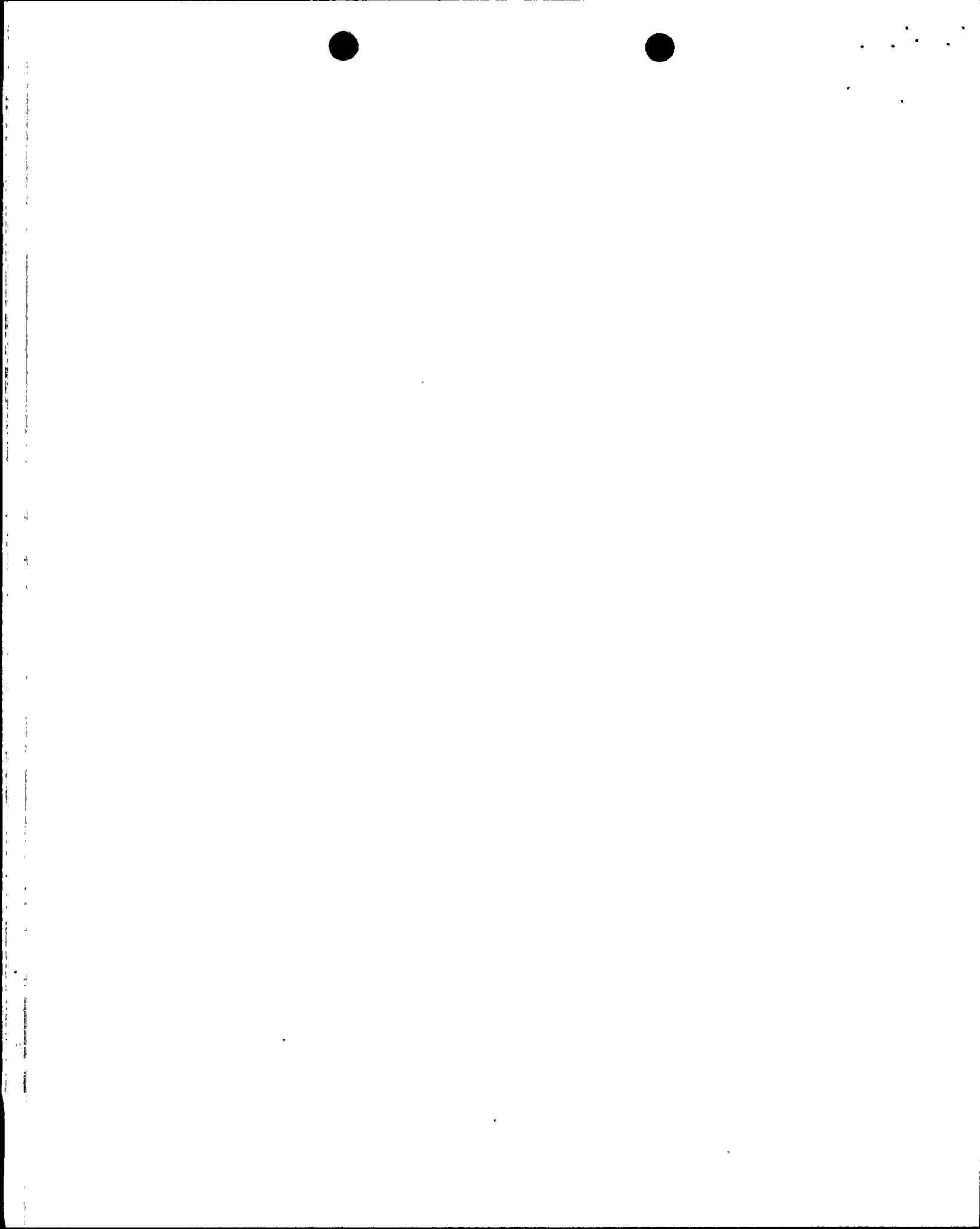
One test was performed during this reporting period; the test result was negative.

Follow-Up Testing:

Under the APS follow-up testing program, a total of 43 tests were conducted during this reporting period. All test results were negative. At the end of this reporting period, ten individuals were under the follow-up testing program based on the results of the "suitable inquiry." Of those ten individuals, four were APS employees, and six were contractor employees.

Other Testing:

During this reporting period, APS tested 40 individuals whose previously granted unescorted access had expired for various reasons and who, therefore, were no longer subject to random testing. As soon as the requirement to retest prior to re-establishment of unescorted access was recognized, the individuals were tested. None of the individuals tested positive.



In each case of a confirmed positive drug test result the individual's site access was revoked. APS employees testing positive for illegal drugs were discharged from employment. APS employees who had a single occurrence of a positive test for alcohol received a disciplinary suspension, evaluation and treatment prior to reinstatement.

Any individual who had a single positive drug test may be eligible to reapply for access after three years.

PROGRAM REVIEW: LABORATORY PERFORMANCE

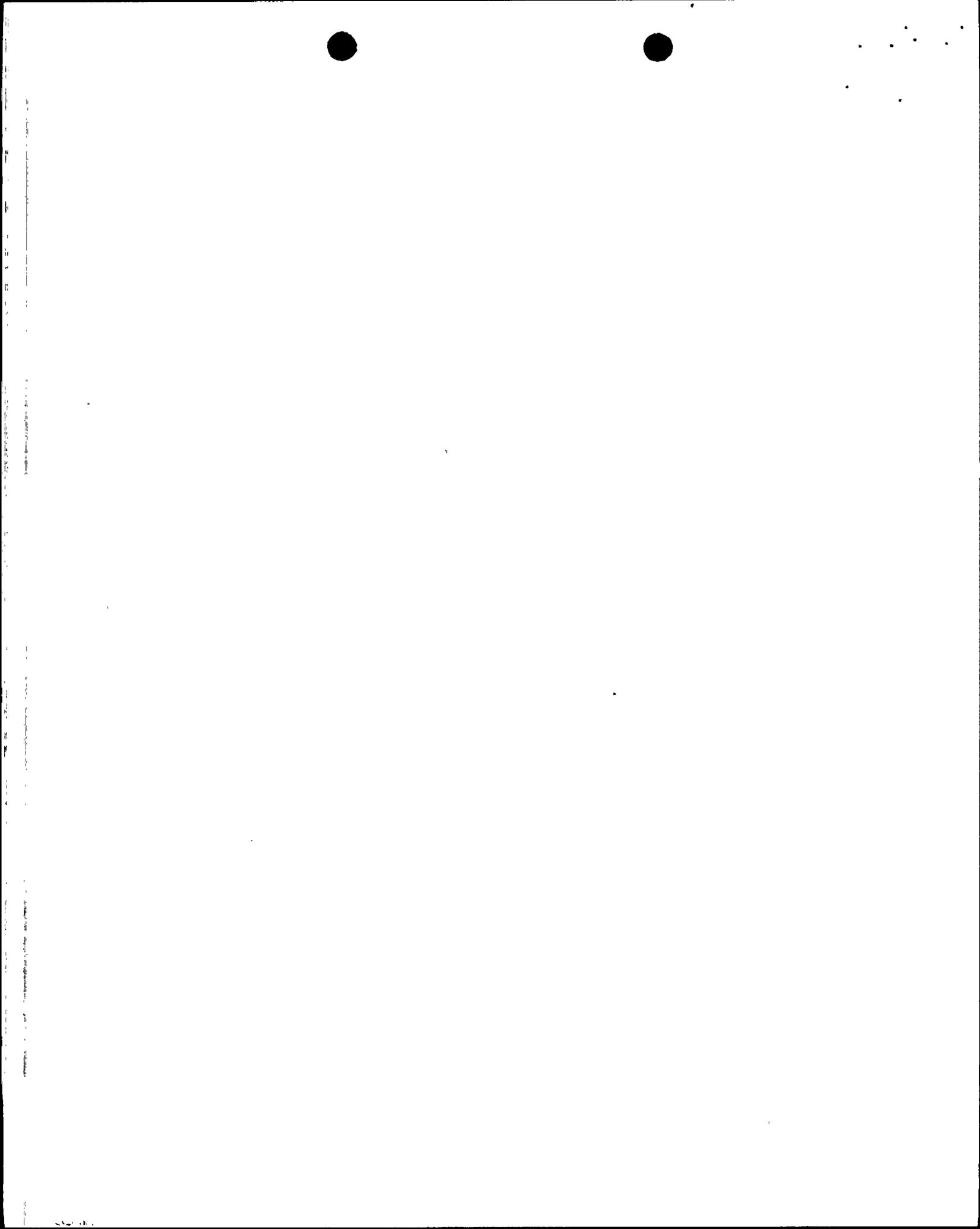
A Quality Assurance (QA) audit was conducted in October 1990. A consulting group was utilized to provide technical support to the audit group. Results from the audit indicated that APS has a comprehensive Fitness-for-Duty Program which meets the requirements of 10 CFR Part 26. Many of the recommendations that were made during the audit have been incorporated into the program.

In December 1990 the Nuclear Regulatory Commission conducted an inspection of the APS Fitness-for-Duty Program. The NRC, as documented in Inspection Report 50-528/90-49, identified one non-cited violation as a result of their inspection activities.

There were two occurrences where performance test specimens (certified by the supplier to be positive) were reported as negative from our Department of Health and Human Services (DHHS) certified laboratories. An investigation was conducted regarding these occurrences, and it was determined that the certified blind specimens deteriorated during the shipping and handling process from the vendor to APS. The DHHS laboratories properly reported the results. The supplier stated the specimens deterioration may have been attributed to the "absorption of the drug to the container." The Medical Review Officer (MRO) reviewed the shipping and handling process and determined it did not contribute to the absorption problem. The MRO also determined that the containers used by APS did not contribute to the situation. As a result of these two occurrences, APS has secured another vendor to provide quality-controlled performance test specimens.

During the reporting period, APS had no other performance problems in connection with blind performance specimens sent to any of the off-site laboratories.

In December 1990, a specimen was lost by one of the DHHS-certified laboratories. The specimen was one-half of a split specimen submitted to the DHHS-certified laboratory as part of an appeals process. The remainder of the specimen, which had been retained by the first DHHS-certified laboratory, was then analyzed for the appeal. Thus, there were no adverse consequences arising from the lost specimen. APS' investigation of this event is continuing.



SUMMARY OF PROGRAM CHANGES

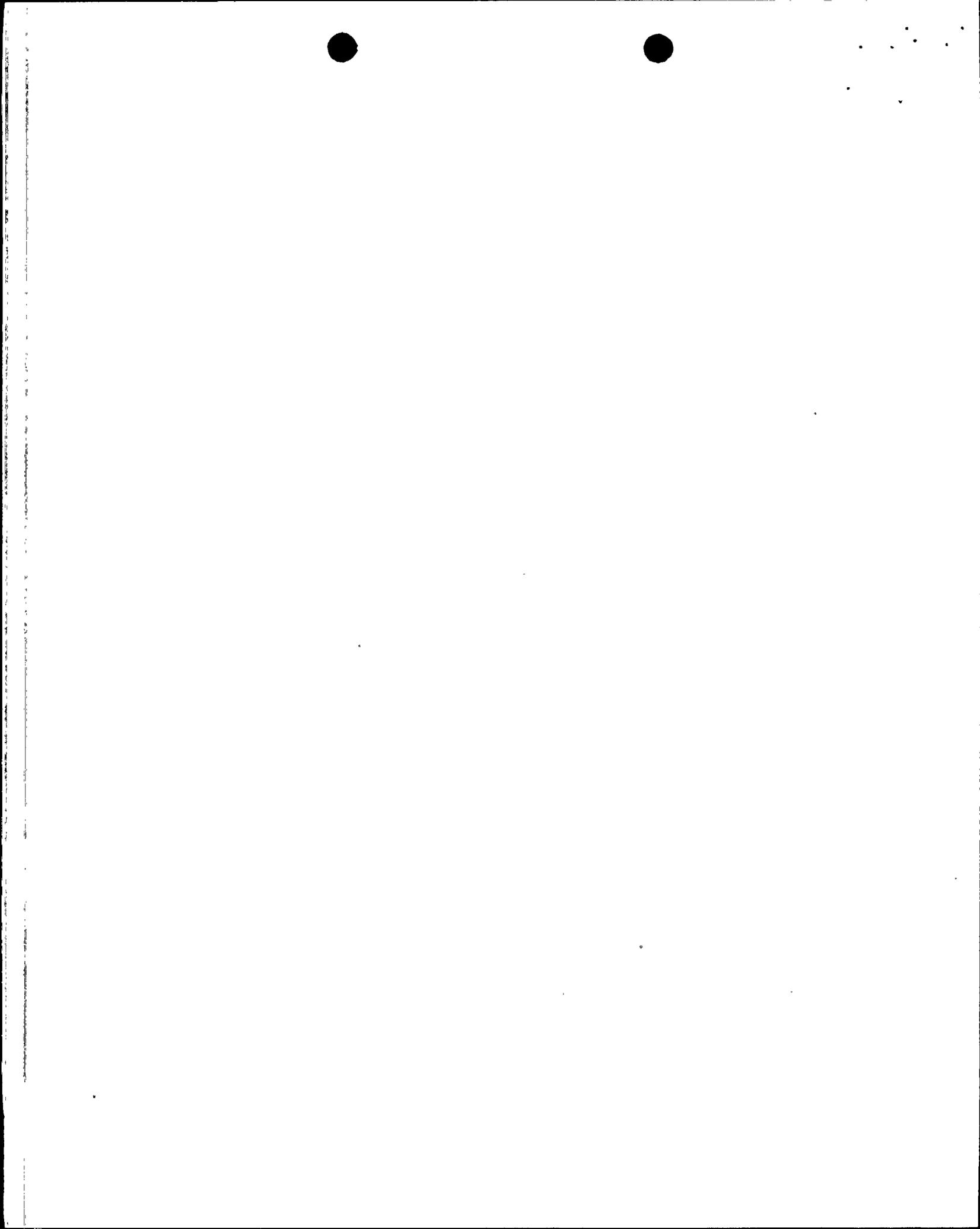
Changes to the existing Fitness-for-Duty Program have been made and are planned which, we believe, will improve the overall effectiveness of the program.

Completed Actions:

1. APS instituted a revised chain of custody form which utilizes bar coding, thus helping reduce the potential for human error with data entry at our DHHS-certified laboratories.
2. APS distributed to personnel a new brochure which addresses our Employee Assistance and Fitness-for-Duty Programs.
3. The Fitness-for-Duty Department was restructured to incorporate the Employee Assistance Program and a newly developed fitness-for-duty auditing function. These organizational changes have improved the overall effectiveness of the program.
4. The Fitness-for-Duty Collection Building was remodeled to enhance the professionalism of the department and to improve the process flow. In addition, new storage and security equipment has been installed.
5. In an effort to increase the awareness of a drug-free work place, the Fitness-for-Duty Department is distributing drug-free buttons to those personnel who have undergone a drug and alcohol test. The response to these buttons has been extremely favorable.
6. The Fitness-for-Duty staff reviewed many of the forms used in the collection process and revised the forms, as necessary, to enhance the program effectiveness.
7. Enhanced training classes were held for supervisory personnel to provide them with specific guidance and instruction on the process of notifying employees of random drug and alcohol testing.

Planned Actions:

1. To reduce the impact on licensed operator shift manning and on overall site productivity, a collection facility inside the protected area will be constructed and is anticipated to be complete by June 1991.
2. In an effort to continue to enhance the Fitness-for-Duty Program and to adopt the pending proposed changes to the regulation, APS will continue to review and revise its procedures to incorporate appropriate changes.



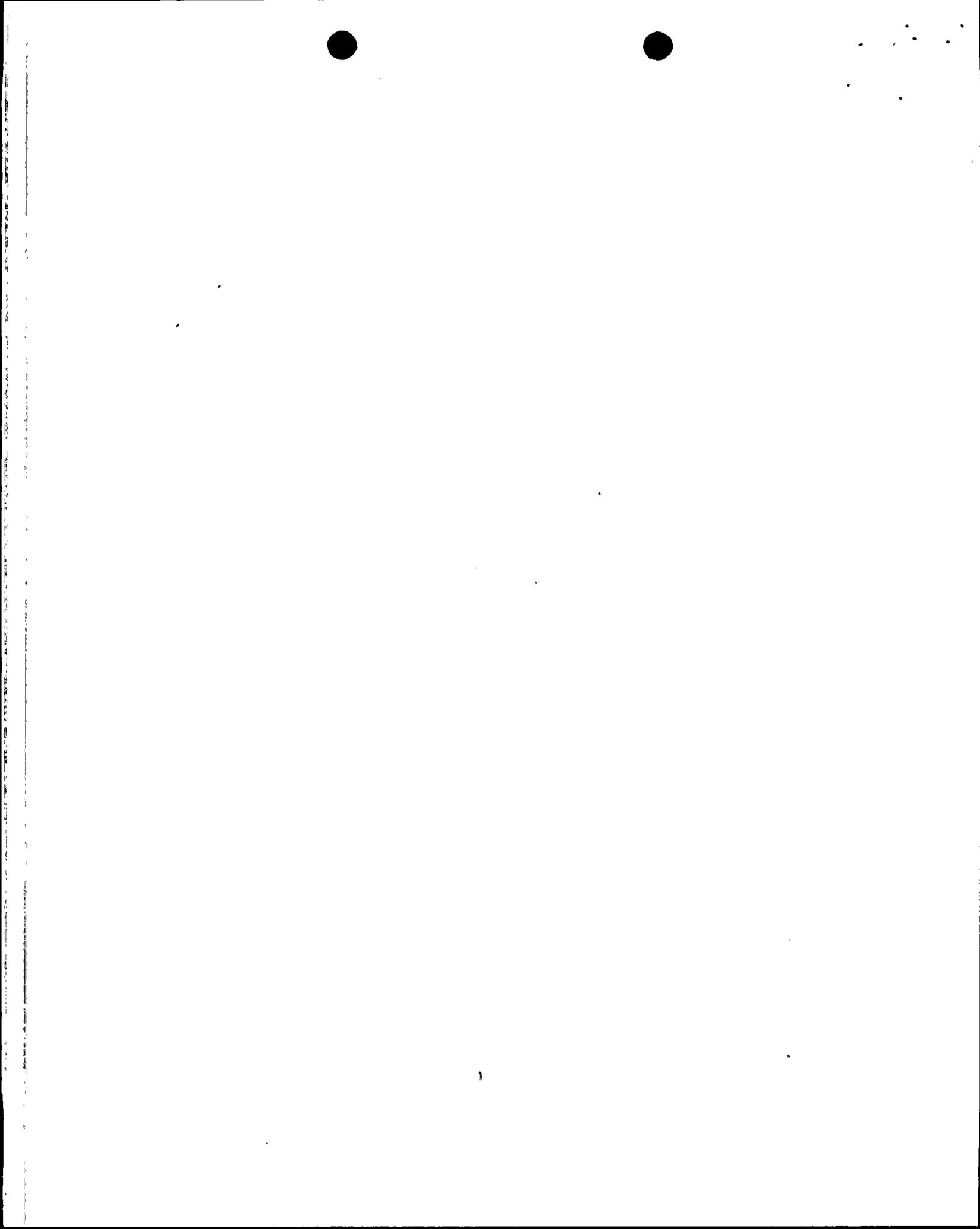
CONCLUSION

The second six months of our program showed significant progress towards achieving a drug-free work place. Of the 4,151 random drug and alcohol tests conducted in 1990, APS experienced a positive rate of 0.3 percent. APS' effective communication program contributes to the success of our Fitness-for-Duty Program which was confirmed by our QA audit and the NRC inspection, both occurring within this semiannual reporting period.

REPORTABLE EVENTS

Events reported by phone to NRC: 1 Total

Summary of Event: On September 28, 1990, at 0742 hours, an APS supervisory individual tested positive for alcohol. The individual submitted to the test after other supervisory personnel smelled the odor of alcohol on the employee's breath. An investigation was conducted by Security Investigations Investigator and Fitness-for-Duty Supervisor which determined the individual had consumed the alcohol the evening prior to the test. As a result of the testing, the individual's site access to Palo Verde was suspended. While personnel action was being considered, the individual resigned.



Fitness for Duty Program
Performance Data
Personnel Subject to 10CFR 26

Arizona Public Service	December 31, 1990
Company Palo Verde Nuclear Generating Station (PVNGS)	6 Months Ending
Location David Heler, Fitness for Duty Supervisor	(602)393-7465
Contact Name	Phone (include area code)
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana 20/15 Amphetamine 300/300 Benzodiazepines 300/300	
Cocaine 300/150 Methamphetamines 1000/300 Barbiturates 300/300	
Opiates 300/300 Phencyclidine 25/25 Alcohol (% of BAC) / .04%	

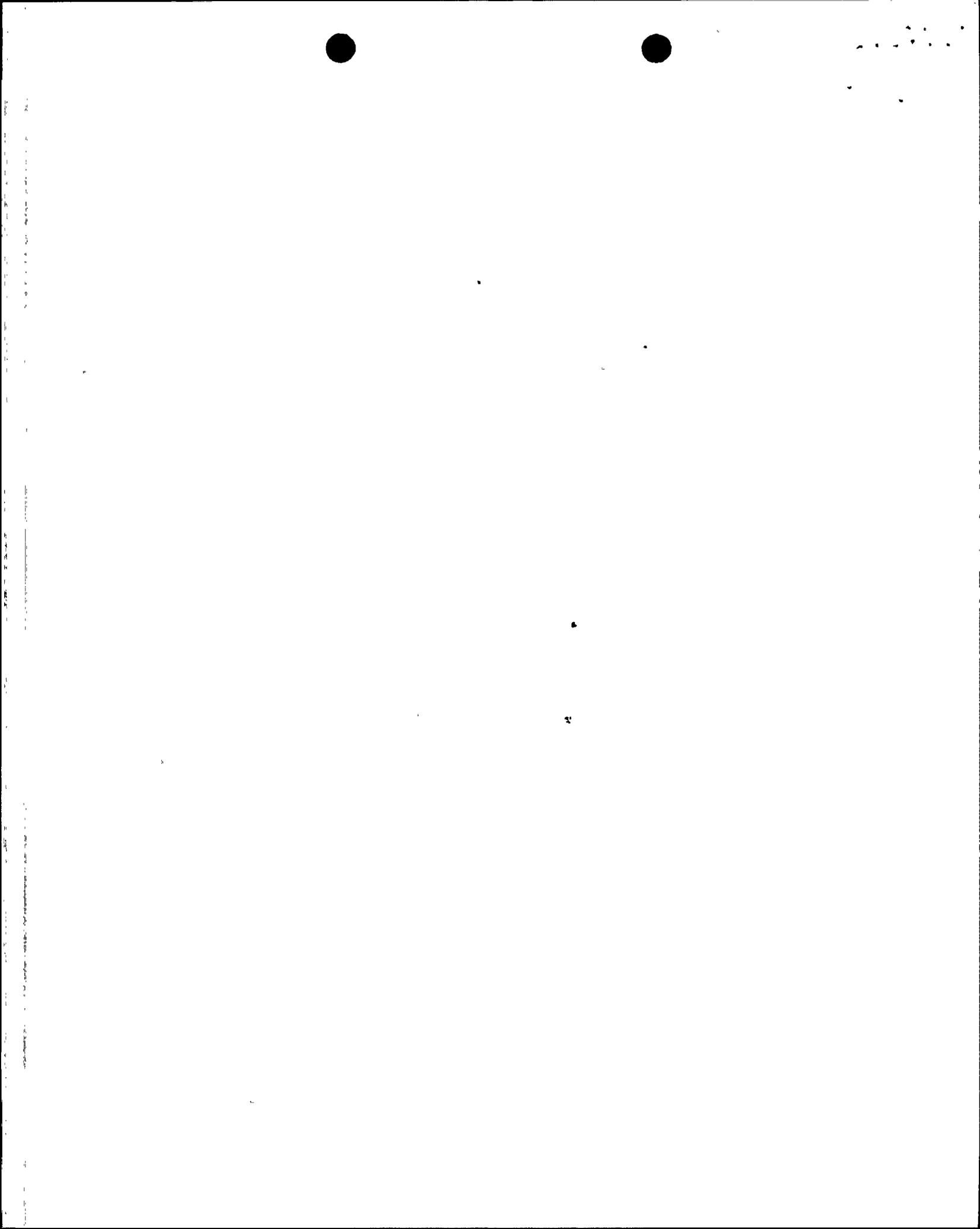
Testing Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access	2,411				N/A		991	
Pre-badging	187	1			N/A	N/A	793	6
For cause	10	2			N/A	N/A	1	1
Post accident	1	0			N/A	N/A	0	0
Random	1,570	4			N/A	N/A	539	5
Follow-up	29	0			N/A	N/A	14	0
Other	22	0			N/A	N/A	18	0
Total	1,819	7			N/A	N/A	1,365	12



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Note: The results for specific substances reported with the "/" indicate, on the left, the number of tests which would have been reported as positive using the NRC cut-off level, while the number on the right indicates the positive results using the APS cut-off level.

* APS uses different cut-off levels than the NRC for several drugs. If the NRC screening cut-off level (100 ng/ml) for marijuana had been used in the testing program instead of the APS cut-off level (20 ng/ml), four individuals would not have tested positive for marijuana.

** One individual tested positive for two substances, marijuana and amphetamine, a result from random testing.



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