



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W.  
ATLANTA, GEORGIA 30323

Report Nos.: 50-250/91-40 and 50-251/91-40

Licensee: Florida Power and Light Company  
9250 West Flagler Street  
Miami, FL 33102

Docket Nos.: 50-250 and 50-251

License Nos.: DPR-31 and DPR-41

Facility Name: Turkey Point 3 and 4

Inspection Conducted: September 3-4, 1991

Inspector: D. Thompson, Safeguards Inspector

10/3/91  
Date Signed

Approved by: D. R. McGuire, Chief  
Safeguards Section  
Nuclear Materials Safety and Safeguards Branch  
Division of Radiation Safety and Safeguards

10/3/91  
Date signed

SUMMARY

Scope:

This special announced inspection was conducted in the areas of the licensee's Fitness for Duty (FFD) program as required by 10 CFR Part 26. Specifically, the licensee's Program Administration and Key Program Processes were reviewed using NRC Temporary Instruction 2515/106, "Fitness for Duty - Initial Inspection of Implemented Program," dated July 11, 1990.

Results:

In the areas inspected, violations or deviations were not identified.

Based upon NRC's selective examination of key elements, it was concluded that the licensee is satisfying the general performance objectives of 10 CFR Part 26. Several strengths were noted in the licensee's FFD Program, i.e., the professionalism of the site FFD coordinator and assistant, FFD staffing and facility, and FFD training.

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- J. Beasley, FFD Technician, Industrial Medical Corporation (IMC), Turkey Point Nuclear Plant (TPN)
- \*W. Bladow, Quality Assurance Manager, TPN
- \*J. Denton, Site FFD Coordinator, TPN
- N. Diaz, FFD Technician, IMC, TPN
- S. Hoadley, FFD Technician, IMC, TPN
- \*L. Pearce, Plant Manager, TPN
- \*T. Plunkett, Vice President, TPN
- M. Poole, FFD Technician, IMC, TPN
- \*D. Powell, Licensing Superintendent, TPN
- E. Smith, Site Assistant FFD Coordinator, TPN
- \*J. West, (Corporate) Nuclear Security Manager
- T. Wordley, FFD Technician, TPN
- \*W. Zinn, Security Operation Coordinator, TPN

Other licensee employees contacted during this inspection included craftsmen, engineers, operators, mechanics, security force members, technicians, and administrative personnel.

#### NRC Resident Inspector

- \*R. Butcher, Senior Resident Inspector
- \*G. Schnebli, Resident Inspector
- \*L. Trocine, Resident Inspector

\*Attended exit interview

### 2. Licensee's Written Policy and Procedures

As noted in NRC Inspection Report No. 50-335, 389/91-05, prior to 10 CFR Part 26, this licensee had an FFD Policy which included drug testing for pre-employment, pre-access and random testing. Additionally, supervisors were provided FFD training. Tests were evaluated by a Medical Review Officer (MRO) and there was an Employee Assistance Program (EAP). Currently, Nuclear Policy titled, "Fitness for Duty," is the statement of the licensee's FFD "Objectives and Required Actions," which was approved by the Nuclear Division President.

The licensee's procedures are detailed and provide adequate information to each person participating in the FFD Program.



### 3. Program Administration

#### a. Management Responsibilities

The Nuclear Security Department has the overall responsibility for implementing the FFD program in accordance with 10 CFR Part 26. He reports to the Senior Vice President of Nuclear Operations, and is assisted by a Corporate FFD Coordinator. At the site, the FFD program is administered by a Site Coordinator and an Assistant. As noted previously, both the Site Coordinator and Assistant were very aware of the Part 26 requirements and were intent to ensure the program was correctly administered.

#### b. Resource Allocation

The technicians are housed at the onsite collection facility, exterior to the protected area, within the site's Medical Station; however, the specimen collection facility is adequately separated. The technicians were attired in distinct matching uniforms which contributed to the overall professionalism of the personnel and collection facility. Floor space, office equipment, storage facilities and collection equipment have been made available for the on-duty collection of specimens.

### 4. Training/Policy Communication

Based upon input from the Resident Inspectors' attendance at the FFD training prior to January 3, 1990, and upon the results of limited interviews conducted during this inspection, it was very evident that the licensee's policy and program were well communicated to the workforce. The licensee continues to use a variety of mediums to educate the employees and contractors on the FFD program: newsletters and articles in the newspaper, memorandums, internal TV bulletins and a combination of pamphlets and booklets.

During interviews with supervisors, licensee employees, and contractors, the inspector found that personnel were very knowledgeable of the contents being presented during annual training. Interviewees further stated that follow-up annual training was well presented and reinforced the initial training.

### 5. Key Program Process

#### a. Identification/Notification

Every weekday, the licensee's Site FFD Coordinator and Assistant will request a random draw of approximately 20 to 25 names (depending on plant population) from the computerized Nuclear Employee Plant Access (NEPA) data bank. Two passwords and one user identification code are necessary to program this draw. The two password identification code prevents one Site FFD Coordinator from entering into the data base

for the other site. Once the draw has been printed, the person pulling the list compares it to the work schedules of plant employees. Using the list and work shift schedules, the person responsible for the list prepares a schedule for the subjects to report for testing. Once a supervisor is notified, the employee is given two hours to arrive at the site collection facility where positive identification by photograph and social security numbers are verified.

In response to an Inspector Follow-up Item (50-335, 389/91-05-01), it was noted that the licensee had developed a more strenuous weekend and holiday testing program and, to date, Turkey Point had conducted 20 tests on holidays.

Personnel stated during interviews that they were aware of weekend/holiday testing and did not believe that there was a "safe area" from testing.

b. Testing

At the Turkey Point Nuclear Plant, the licensee averages testing between 20-25 candidates per day.

During the calendar year January 1, 1991, to September 3, 1991, the licensee tested from the plant population 2,894 candidates. The plant population for this period has averaged 3,861.

The percentage of population tested was 74.95. Percentage selected but not tested was 10.43. The percentage positives and refusals was 0.55. Random tests were as follows:

<u>Licensee</u>	
Once	1,576
Twice	438
Three Times	113
Four Times	22
Five Times	3

The inspector observed collection and testing of specimens and noted that the personnel were friendly, professional and highly trained to perform their assigned duties. Each person interviewed considered the collection facility adequate and staffed with professional personnel.

6. Sanctions and Appeals

A positive test for alcohol or illegal drugs results in termination or, in the case of a contractor, the sanction is denial of access. Refusal to test, possession of alcohol on the licensee's property and possession of illegal drugs on or off the job also results in termination.



## 7. Audit

The FFD program was audited during the period March 5, 1991, to July 1, 1991. The audit was conducted to verify that Nuclear Security has developed and effectively implemented the FPL FFD program per 10 CFR Part 26 and that corrective action items from a previous audit (QAS-FFD-90-1) were implemented and effective.

The FFD program audit was divided into the following categories: general provisions, program elements and procedures, policy communications and awareness training, training of supervisors and escorts, contractors and vendors, chemical testing, employee assistance programs, management actions and sanctions to be imposed, appeals, protection of information, inspections, records and reports, audits, MRO, and laboratory facilities.

One finding was identified. However, the audit concluded that FPL's FFD program has been effectively developed, implemented and documented.

The inspector reviewed the FFD audit and concluded that the Quality Assurance (QAS-FFD-91-1) was a thorough review of the program and was well documented.

## 8. Exit Interview

The inspection scope and results were summarized on September 6, 1991, with those persons indicated in paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed below. Dissenting comments were not received from the licensee.

The licensee was complimented for having a program which satisfies the general performance objectives of Part 26. There were several strengths noted in the program. Those strengths were the professionalism of the site FFD (coordinator and assistant), FFD training, FFD facilities and the excellent technicians who operated the collection facility. The licensee was informed that Inspector Follow-up Item 91-05-01, noted during the Corporate/St. Lucie FFD inspection 50-335,389/91-05, would be closed in this report.

