



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W., SUITE 2900
 ATLANTA, GEORGIA 30323-0199

Report Nos. 50-250/94-15 and 50-251/94-15

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 Plant Units 3 and 4

Inspection Conducted: June 27 - 29, 1994

Inspector: *William J. Tobin*
 William J. Tobin, Senior Safeguards Inspector

7-28-94
 Date Signed

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

7/28/94
 Date Signed

SUMMARY

Scope:

This routine, announced inspection was conducted in the area of the licensee's Fitness For Duty program; specifically, the inspector reviewed Procedures and Staff Training, Collection Practices, Audits, and an event occurring on February 2, 1994 involving the positive random test of a licensee supervisor.

Results:

In the areas inspected, violations or deviations were not identified. The licensee continues to have a strong and effective Fitness For Duty program. The professionalism of the staff was evidenced throughout the inspection. Collection processes were well received by the donors and audits were thorough and intensive. The event of February 2, 1994, was conducted in compliance with Part 26 requirements.



REPORT DETAILS

1. Persons Contacted

Licensee Employees

M. Alvarez, Laboratory Technician
*G. Boissy, Director of Nuclear Services
*D. Canazaro, Lead Auditor
V. Cominskis, Service Manager
*A. Cumings, Corporate Fitness For Duty Coordinator
*J. Denton, Site Fitness For Duty Coordinator
*J. DiAngeles, Speakout Representative
B. Keating, Courier, Road Runner Inc.
*J. Labarraque, Speakout Supervisor
*F. Marcussen, Site Security Manager
*G. Mayer, Corporate Nuclear Security Manager
W. Pierce, Plant Manager
*R. Rainone, Medical Review Officer
M. Smith, Site Fitness For Duty Assistant Coordinator
E. Weinkan, Licensing Manager

U. S. Nuclear Regulatory Commission

B. Desai, Resident Inspector
L. Trocine, Resident Inspector

*Attended exit interview

2. Fitness For Duty Program

a. Procedures and Staff

The licensee utilizes the following Fitness For Duty (FFD) procedures to implement Part 26 requirements.

FFD1 - "Selection and Notification for Drug/Alcohol Testing"
FFD2 - "Urinalysis Collection"
FFD3 - "Alcohol Testing"
FFD4 - "Blind Samples"
FFD5 - "Processing and Reporting Test Results"
FFD6 - "NRC Event Reporting"
FFD7 - "FFD Work Reviews"

Additionally, the licensee uses Interdepartmental Procedure No. 401, "Nuclear Division FFD Program," and No. 406, "FFD Training" which originated at the Corporate Office.



The inspector found, through observation and discussion, the FFD staff, at both the site and corporate, appeared to be well versed in their procedural responsibilities and duties. Procedures accurately guided the technicians and staff in the conduct of specimen collection, chain of custody, appeals and reporting of events. Procedures were revised to reflect the NRC newly required 50 percent annual random testing rate.

Currently, the licensee has the following screening cut-off limits:

	<u>Preliminary</u>	<u>Confirmatory</u>
Amphetamine	1000 ng/ml	500 ng/ml
Bensoylecgoine	300 ng/ml	150 ng/ml
Cannalinoid	50 (NRC is 100) ng/ml	10 (NRC is 15) ng/ml
Opiates	300 ng/ml	300 ng/ml
Phemegslidine	25 ng.ml	25 ng/ml
Alcohol	.05% blood alcohol concentration (bac)	.04% bac

The licensee's procedures (requiring more restrictive cutoff limits than NRC requires) and staff knowledge of the testing procedures were strengths to the FFD Program.

b. Training

The inspector reviewed the training records for the licensee's site FFD Administrator and Assistant Administrator, as well as the contract technicians. All had been trained in the appropriate procedures to accomplish their responsibilities. Through observation and discussion the inspector verified job knowledge of the individuals involved in specimen collection, chain of custody, and records retention.

It was noted that the licensee's employees who administer the FFD program are additionally trained and qualified in the operation of the Intoxilizer.

The FFD staff is trained in the administration of the psychological testing instrument, the Minnesota Multiphasic Personality Inventory (MMPI) 2. These tests are secured in the FFD facility and the person taking the test is monitored by the FFD staff.

The inspector concluded that the FFD staff was well trained, qualified and certified. The staff was found competent and capable to perform their FFD duties and responsibilities.

c. Collection Practices

At the Turkey Point Nuclear Station the average population in the testing pool for 1994 has been 1712 individuals. Currently, the



licensee has randomly chosen for testing 24.8 percent. This "running average analysis," a term used by the licensee, means that by December 1994, 50 percent of the population will have been randomly tested, thus, meeting the NRC requirement.

Of the individuals randomly selected for testing, approximately 7 percent were unavailable for reasons such as sick leave, vacation, or in excess of the 100 miles from the site (criteria established by the licensee). In these cases the licensee will withhold notification of the individual for 7 days while awaiting their return to work. At the end of the 7 days, the individual has not returned for work, the licensee concludes that if there is no justification for the individual to have a badge for unescorted access and the badge is voided at the security access point. As of the date of this inspection, there had been 426 random collections which resulted in 1 positive (see paragraph 2.e).

Individuals in the follow-up pool, as a result of referral to rehabilitation, are concurrently in the random pool. The FFD Administrator and his Assistant rearrange their work schedule to be available for follow-up testing of individuals working various shifts. Currently there are 9 individuals in the follow-up pool.

The licensee's records reveal that in the last 24 months there have been a total of 36 random positives (14 at St. Lucie and 22 at Turkey Point). Out of that total, 8 were for alcohol, 19 for marijuana, and 9 for cocaine.

Between June 1991 and June 1994, the licensee conducted a total of 67 "for-cause" tests (27 at St. Lucie and 40 at Turkey Point); of that total, 14 were positive for alcohol, 2 positive for marijuana and 1 positive for cocaine. There were 2 "refusals" which resulted in termination.

Relative to the randomness of specimen collection in 1994, the licensee tested an individual on January 17 (King Day), February 21 (Presidents Day), May 30 (Memorial Day), three Sundays, and three Saturdays.

There have been 427 specimens collected from 387 individuals as a result of the following repetitious cycle:

Tested once	-	350 people
Tested twice	-	34 people
Tested three times	-	9 people

In the event of a "no-show", the supervisor of the person who was unavailable for random testing must document to the site FFD Administrator the reason, which is then monitored for supervisor and worker trending. The Corporate FFD Administrator also monitors "no-shows".



Relatives of FFD personnel have been identified in the random pool and there are safeguards in place against a FFD technician testing a family member. Persons in the FFD staff who are randomly chosen for testing are tested in the presence of a Quality Assurance Auditor.

The inspector observed random selection of individuals to be tested, positive identification upon arrival at the FFD facility, specimen collection, sample splitting, bar-coding, chain of custody, storage, courier pick up, and blind sample submittal. The technicians were well qualified and performed in accordance with procedures and regulations.

Various individuals undergoing the collection process were observed by the inspector and voiced no dissent with the licensee's FFD program.

In conclusion, the licensee's collection practices were thorough and consistent, there were no "safe havens" of non-testing, the chain of custody was adhered to, and the professionalism of the personnel involved was evident.

d. Audits

Audit No. QAS-FFD-1 was conducted between March 11 and May 9, 1994, at both nuclear plants and at the Corporate Offices. The audit team was assisted by a contract technical specialist knowledgeable in toxicology. The results were furnished to the Nuclear Division President, Site Vice Presidents, Plant General Managers, Nuclear Services Director, Nuclear Assurance Vice President and to the members of the Nuclear Review Board.

The audit concluded that Part 26 is being adequately addressed in procedures and that these procedures are effectively implemented; however, based on the deficiencies identified there is a need to strengthen self-assessment within the Nuclear Security group. The deficiencies identified in the report were of the type that may have been identified internally if a program of self-assessment in place.

There were three findings:

1. Approximately 40 supervisors had not been FFD trained in excess of 15 months because of promotions and transfers.
2. The FFD training in the General Employee Training class had inaccurate references due to FFD procedure revisions.
3. In the event of the breathalyzer being out of acceptable limits there was no procedure for recalibration.

All three of these findings had been corrected prior to this inspection.



In conclusion, the licensee's audit function was thorough, in-depth and extensive. The inspector considered the audit conclusion to be accurate.

e. Positive Drug Test Event

On January 28, 1994, a licensee supervisor was randomly chosen for drug urinalysis which on February 2 was reported to be positive for marijuana.

Through interview, direct observation and review of pertinent documents the inspector was able to determine the following:

- The supervisor was originally scheduled for a 6:00 a.m. specimen collection but did not arrive until 7:30 a.m., on January 28, 1994, explaining that his relief was not available. Upon signing his consent form for the specimen collection, the supervisor also noted "under duress."
- An unusual creatinine level (less than 20 ng/ml) was noted in the specimen at the urinalysis testing laboratory. According to 10 CFR Part 26, Appendix A, Subpart B, 2.4, Section (f)(2), creatinine levels below .2 g/l (20 ng/ml) are, "...exclusive grounds constituting a reason to believe that the individual may have altered or substituted a urine specimen..."
- The urinalysis testing laboratory, on January 31, 1994, determined that the urine was almost twice the licensee's cut-off limit in a preliminary test for marijuana metabolites. This caused a test using gas chromatography/mass spectrometry which confirmed the presence of marijuana at twice the cut-off limit for such a test.
- Upon his appeal, the supervisor's split sample was sent to another laboratory which reported that it also confirmed the presence of marijuana at almost twice the cut-off limit.
- The licensee's chain of the custody and training of personnel involved in both of urinalysis testings were in accordance with 10 CFR Part 26 criteria.
- The licensee reported the event as required to the NRC on February 2, 1994.
- The licensee's Speakout organization investigated this incident, at the request of the Plant Manager, and found no violations.

Based upon the inspector's findings, the licensee's Positive Drug Test Event will be closed, there were no violations.



3. Exit Interview

The Exit Meeting was held on July 29, 1994, at the licensee's Juno Beach Corporate Office with those so noted in paragraph 1. Turkey Point Nuclear Station personnel were telephonically connected. The licensee was advised that there were no violations, various strengths were noted, and no dissent was expressed by the licensee.

