REPORT NUMBER: 71400

REPORT TYPE: Management and Personnel Subcategory

REVISION NUMBER: 3

TITLE: Drugs

PAGE 1 OF 13

REASON FOR REVISION:

Incorporation of final TAS editorial comments.

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REPORT NUMBER: 71400

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PAGE i OF viii

#### Preface

This subcategory report is one of a series of reports prepared for the Employee Concerns Special Program (ECSP) of the Tennessee Valley Authority (TVA). The ECSP and the organization which carried out the program, the Employee Concerns Task Group (ECTG), were established by TVA's Hanager of Nuclear Power to evaluate and report on those Office of Nuclear Power (ONP) employee concerns filed before February 1, 1986. Concerns filed after that date are handled by the ongoing ONP Employee Concerns Program (ECP).

The ECSP addressed over 5800 employee concerns. Each of the concerns was a formal, written description of a circumstance or circumstances that an employee thought was unsafe, unjust, inefficient, or inappropriate. The mission of the Employee Concerns Special Program was to thoroughly investigate all issues presented in the concerns and to report the results of those investigations in a form accessible to ONP employees, the NRC, and the general public. The results of these investigations are communicated by four levels of ECSP reports: element, subcategory, category, and final.

Element reports, the lowest reporting level, will be published only for those concerns directly affecting the restart of Sequoyah Nuclear Plant's reactor unit 2. An element consists of one or more closely related issues. An issue is a potential problem identified by ECTG during the evaluation process as having been raised in one or more concerns. For efficient handling, what appeared to be similar concerns were grouped into elements early in the program, but issue definitions emerged from the evaluation process itself. Consequently, some elements did include only one issue, but often the ECTG evaluation found more than one issue per element.

Subcategory reports summarize the evaluation of a number of elements. However, the subcategory report does more than collect element level evaluations. The subcategory level overview of element findings leads to an integration of information that cannot take place at the element level. This integration of information reveals the extent to which problems overlap more than one element and will therefore require corrective action for underlying causes not fully apparent at the element level.

To make the subcategory reports easier to understand, three items have been placed at the front of each report: a preface, a glossary of the terminology unique to ECSP reports, and a list of acronyms (terms formed from the first letters of a series of words).

Additionally, at the end of each subcategory report the reader will find at least two attachments. The first is a Subcategory Summary Table that includes the following information: the concern number, a brief statement of the concern, and a designation of nuclear safety-related concerns. The second attachment is a listing of the concerns included in each issue evaluated in the subcategory.

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REPORT NUMBER: 71400

FRONT MATTER REV: 2

PAGE ii OF viii

The subcategories are themselves summarized in a series of eight category reports. Each category report reviews the major findings and collective significance of the subcategory reports in one of the following areas:

- management and personnel relations
- industrial safety
- construction
- material control
- operations
- quality assurance/quality control
- welding
- engineering

A separate report on employee concerns dealing with specific contentions of intimidation, harassment, and wrongdoing will be released by the TVA Office of the Inspector General.

Just as the subcategory reports integrate the information collected at the element level, the category reports integrate the information assembled in all the subcategory reports within the category, addressing particularly the underlying causes of those problems that run across more than one subcategory.

A final report will integrate and assess the information collected by all of the lower level reports prepared for the ECSP, including the Inspector General's report.

For more detail on the methods by which ECTG employee concerns were evaluated and reported, consult the Tennessee Valley Authority Employee Concerns Task Group Program Hanual. The Hanual spells out the program's objectives, scope, organization, and responsibilities. It also specifies the procedures that were followed in the investigation, reporting, and closeout of the issues raised by employee concerns.

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REPORT NUMBER: 71400

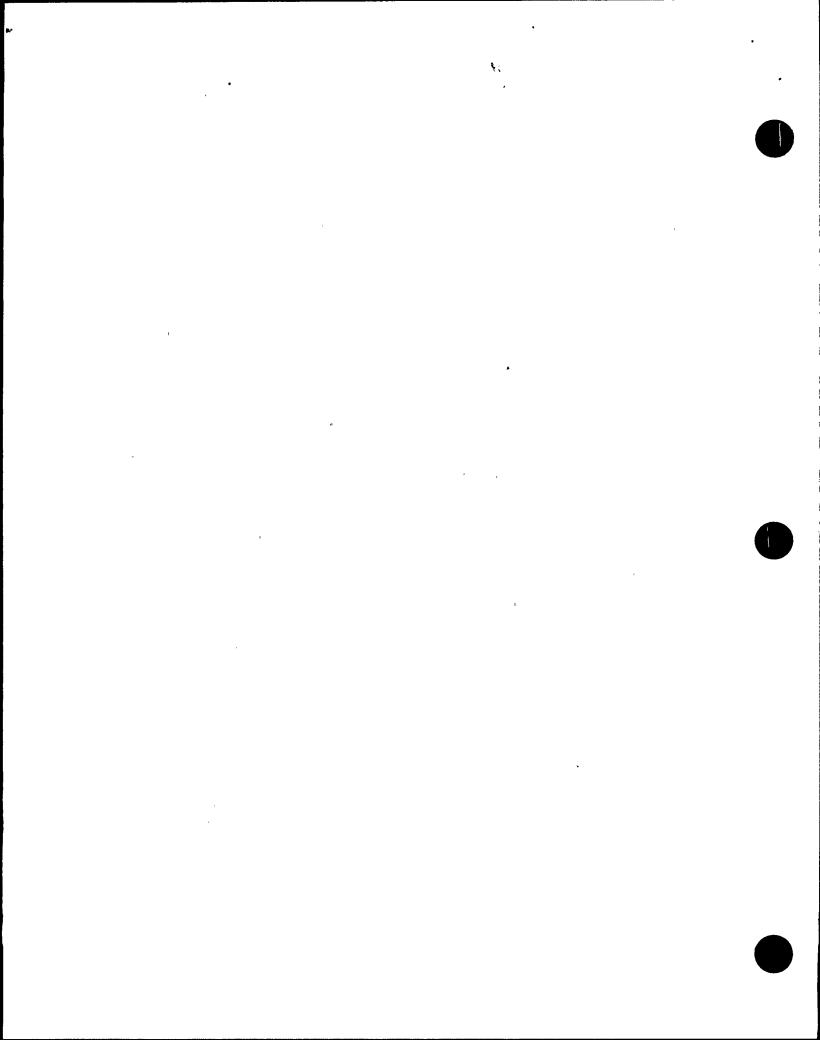
FRONT MATTER REV: 2

PAGE iii OF viii

#### ECSP GLOSSARY OF REPORT TERMS\*

classification of evaluated issues the evaluation of an issue leads to one of the following determinations:

- Class A: Issue cannot be verified as factual
- Class B: Issue is factually accurate, but what is described is not a problem (i.e., not a condition requiring corrective action)
- Class C: Issue is factual and identifies a problem, but corrective action for the problem was initiated before the evaluation of the issue was undertaken
- Class D: Issue is factual and presents a problem for which corrective action has been, or is being, taken as a result of an evaluation
- Class E: A problem, requiring corrective action, which was not identified by an employee concern, but was revealed during the ECTG evaluation of an issue raised by an employee concern.
- collective significance an analysis which determines the importance and consequences of the findings in a particular ECSP report by putting those findings in the proper perspective.
- concern (see "employee concern")
- corrective action steps taken to fix specific deficiencies or discrepancies revealed by a negative finding and, when necessary, to correct causes in order to prevent recurrence.
- criterion (plural: criteria) a basis for defining a performance, behavior, or quality which ONP imposes on itself (see also "requirement").
- element or element report an optional level of ECSP report, below the subcategory level, that deals with one or more issues.
- employee concern a formal, written description of a circumstance or circumstances that an employee thinks unsafe, unjust, inefficient or inappropriate; usually documented on a K-form or a form equivalent to the K-form.



REPORT NUMBER: 71400

FRONT HATTER REV: 2

PAGE iv OF viii

evaluator(s) the individual(s) assigned the responsibility to assess a specific grouping of employee concerns.

<u>findings</u> includes both statements of fact and the judgments made about those facts during the evaluation process; negative findings require corrective action.

<u>issue</u> a potential problem, as interpreted by the ECTG during the evaluation process, raised in one or more concerns.

K-form (see "employee concern")

requirement a standard of performance, behavior, or quality on which an evaluation judgment or decision may be based.

root cause the underlying reason for a problem.

\*Terms essential to the program but which require detailed definition have been defined in the ECTG Procedure Hanual (e.g., generic, specific, nuclear safety-related, unreviewed safety-significant question).

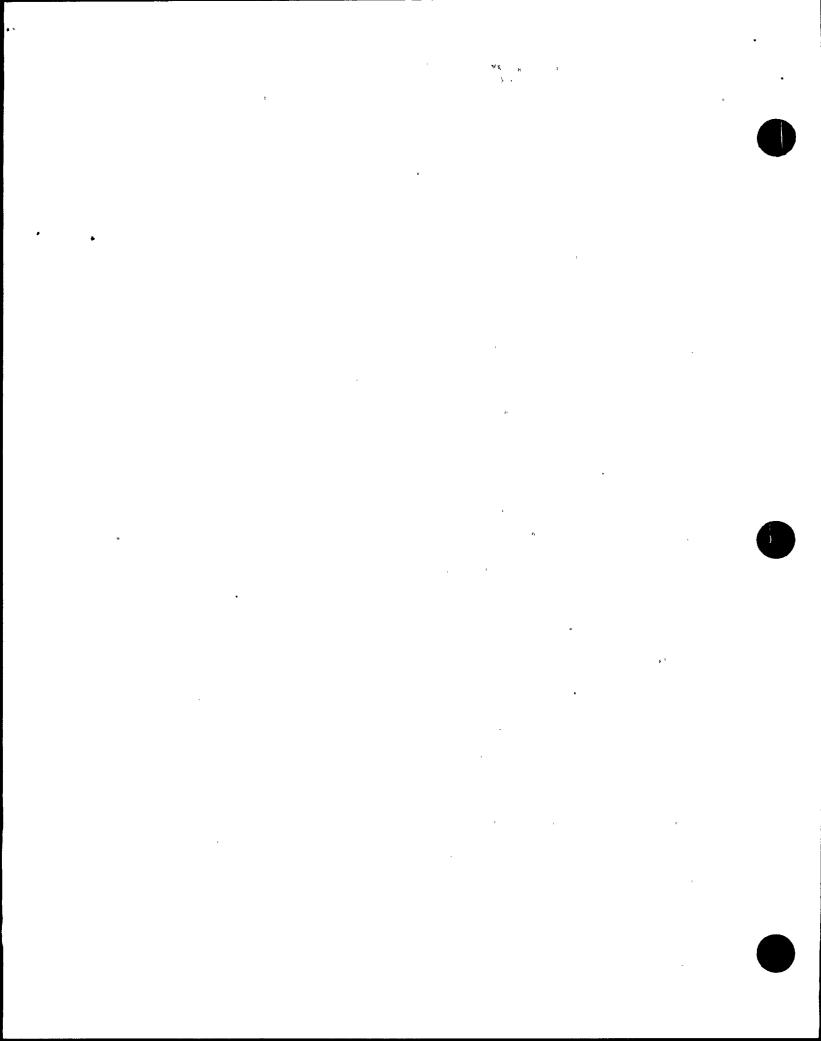
REPORT NUMBER: 71400

FRONT HATTER REV: 2

PAGE v OF viii

### Acronyms

AI	Administrative Instruction
AISC	American Institute of Steel Construction
ALARA	As Low As Reasonably Achievable
ANS	American Nuclear Society
ANSI	American National Standards Institute
ASHE	American Society of Mechanical Engineers
ASTH	American Society for Testing and Haterials
AWS	American Welding Society
BFN	Browns Ferry Nuclear Plant
BLN	Bellefonte Nuclear Plant
CAQ	Condition Adverse to Quality
CAR	Corrective Action Report
CATD	Corrective Action Tracking Document
CCTS	Corporate Commitment Tracking System
CEG-H	Category Evaluation Group Head
CFR	Code of Federal Regulations
CI	Concerned Individual
CHTR	Certified Material Test Report
COC	Certificate of Conformance/Compliance
DCR	Design Change Request
DNC	Division of Nuclear Construction (see also NU CON)



REPORT NUMBER: 71400

FRONT MATTER REV: 2

PAGE vi OF viii

DNE Division of Nuclear Engineering

DNQA Division of Nuclear Quality Assurance

DNT Division of Nuclear Training

DOE Department of Energy

DPO Division Personnel Officer

DR Discrepancy Report or Deviation Report

ECN Engineering Change Notice

ECP Employee Concerns Program

ECP-SR Employee Concerns Program-Site Representative

ECSP Employee Concerns Special Program

ECTG Employee Concerns Task Group

EEOC Equal Employment Opportunity Commission

EO Environmental Qualification

EMRT Emergency Hedical Response Team

EN DES Engineering Design

ERT Employee Response Team or Emergency Response Team

FCR Field Change Request

FSAR Final Safety Analysis Report

FY Fiscal Year

GET General Employee Training

HCI Hazard Control Instruction

HVAC Heating, Ventilating, Air Conditioning

II Installation Instruction

INPO Institute of Nuclear Power Operations

IRN Inspection Rejection Notice

REPORT NUMBER: 71400

FRONT HATTER REV: 2

PAGE vii OF viii

L/R Labor Relations Staff

M&AI Hodifications and Additions Instruction

MI Maintenance Instruction

MSPB Herit Systems Protection Board

HT Hagnetic Particle Testing

NCR Nonconforming Condition Report

NDE Nondestructive Examination

NPP Nuclear Performance Plan

NPS Non-plant Specific or Nuclear Procedures System

NQAH Nuclear Quality Assurance Hanual

NRC Nuclear Regulatory Commission

NSB Nuclear Services Branch

NSRS Nuclear Safety Review Staff

NU CON Division of Nuclear Construction (obsolete abbreviation, see DNC)

NUMARC Nuclear Utility Hanagement and Resources Committee

OSHA Occupational Safety and Health Administration (or Act)

ONP Office of Nuclear Power

OWCP Office of Workers Compensation Program

PHR Personal History Record

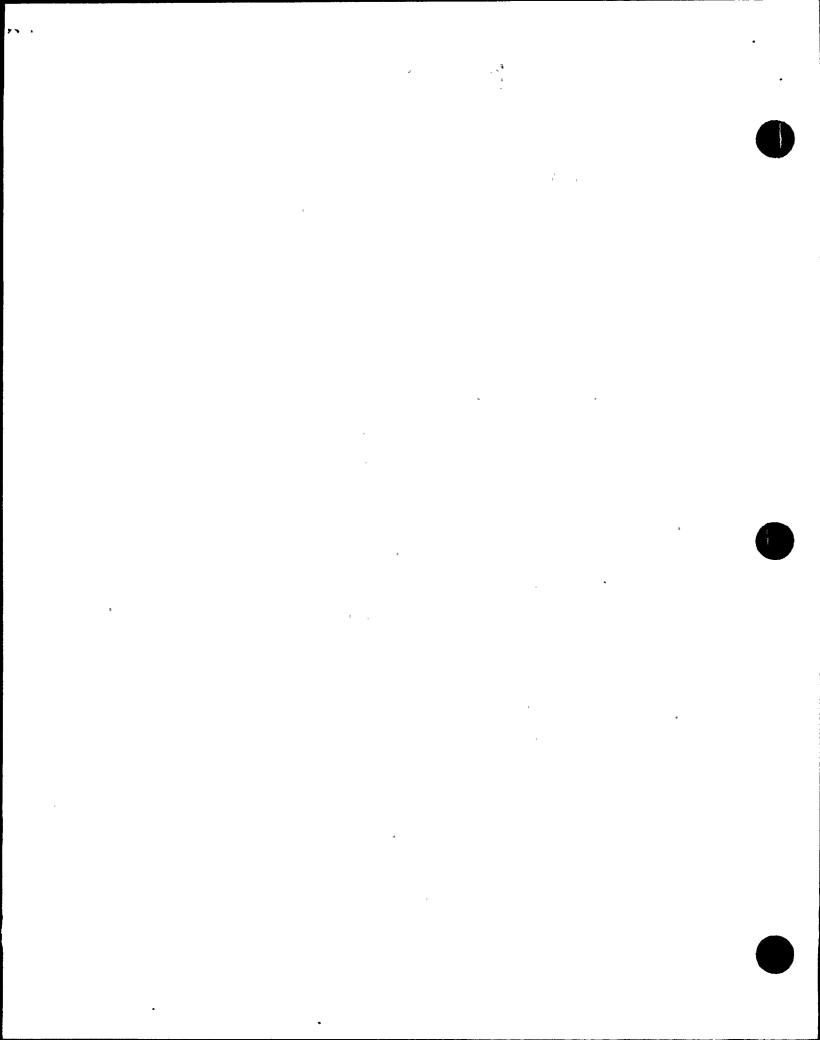
PT Liquid Penetrant Testing

QA Quality Assurance

QAP Quality Assurance Procedures

QC Quality Control

QCI Quality Control Instruction



REPORT NUMBER: 71400

FRONT MATTER REV: 2

PAGE viii OF viii

QCP	Quality Control Procedure
QTC	Quality Technology Company
RIF	Reduction in Force
RT '	Radiographic Testing
SQN	Sequoyah Nuclear Plant
SI	Surveillance Instruction
SOP	Standard Operating Procedure
SRP	Senior Review Panel
SWEC	Stone and Webster Engineering Corporation
TAS	Technical Assistance Staff
T&L	Trades and Labor
AVT	Tennessee Valley Authority
TVTLC	Tennessee Valley Trades and Labor Council
UT	Ultrasonic Testing
VT	Visual Testing
WBECSP	Watts Bar Employee Concern Special Program
WBN	Watts Bar Nuclear Plant
WR	Work Request or Work Rules

WP Workplans

REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 2 OF 13

### 1.0 CHARACTERIZATION OF ISSUES

This report covers 23 employee concerns addressing the use and control of drugs and alcohol at Watts Bar Nuclear Plant (WBN). The 23 employee concerns raised three issues about a) the drug testing program (21 concerns); b) the Employee Assistance Program (1 concern); and c) the legality of a proposed random drug testing program (1 concern). These issues are characterized as follows.

### 1.1 Issue 71401 - Adequacy of Drug Testing Program

Most of the concerns that make up this issue expressed or implied the need for more comprehensive drug testing procedures. Some of the concerned individuals perceived drug abuse to be widespread at WBN and other ONP sites. This perception raised questions about the effects of drug abuse on plant safety. One individual stated that employees are reluctant to report drug users for fear of reprisal.

### 1.2 Issue 71402 - Abuse of Employee Assistance Program

One concern alleged that construction workers report to work under the influence of drugs. They are allegedly allowed to continue working and continue using drugs if they tell TVA they are enrolled in a drug abuse program. Additionally, these drug abusers are alleged to be retained at layoff time at the expense of non-abusers.

#### 1.3 Issue 71403 - Legality of Random Testing

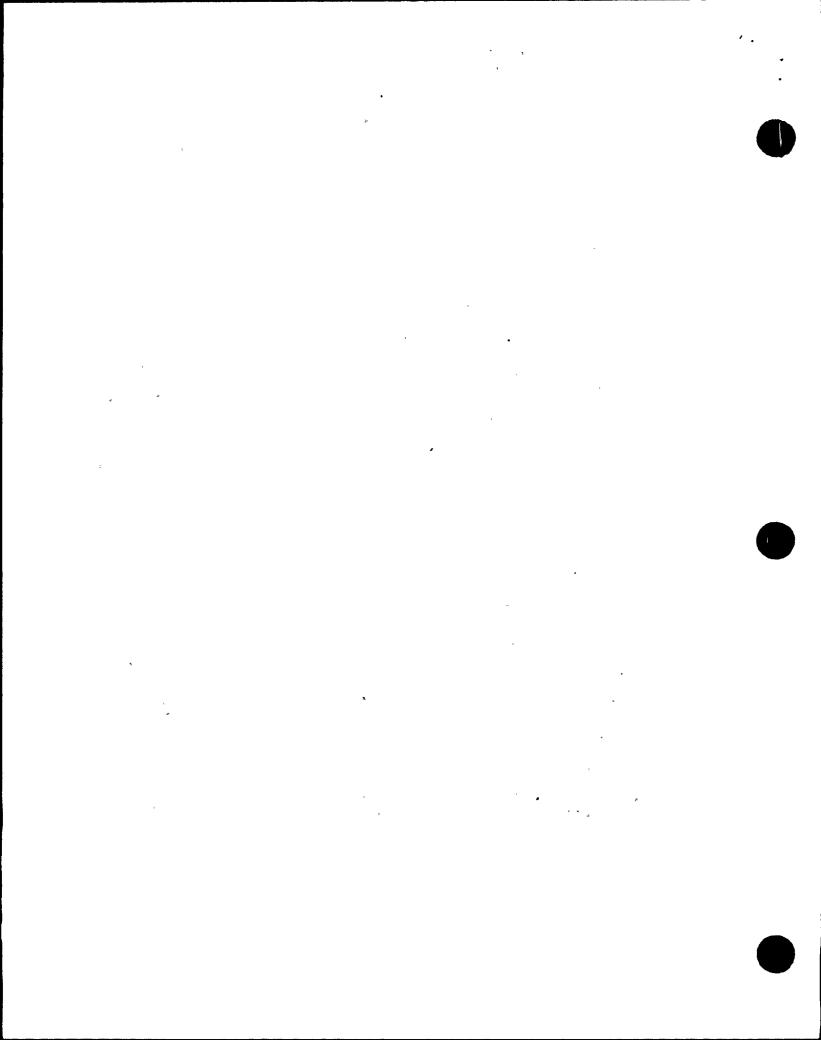
One concern argued that random testing for drugs would be a violation of the constitutional right to privacy.

To locate the issue in which a particular concern is evaluated, consult the following attachments:

Attachment A, Subcategory Summary Table

Attachment B, List of Concerns by Issue

All Management and Personnel Category concerns having a technical component (including all concerns designated Nuclear Safety-Related) are shared with the appropriate technical category for investigation and resolution of that technical component. Report(s) sharing a concern with this report are identified in the entry for that concern on Attachment A.



REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 3 OF 13

#### 2.0 SUMMARY

#### 2.1 Summary of Issues

There are three issues contained in the 23 employee concerns addressing drug use. The first issue (with a total of 21 concerns) expressed or implied the need for a more comprehensive drug testing program at WBN. One issue implied abuse of the Employee Assistance Program (EAP). One issue questioned the legality of random testing for drugs: does such testing violate the constitutional right of privacy and the avoidance of search without probable cause?

### 2.2 Summary of Evaluation Process

The evaluator has reviewed all the information available on the concerns in this subcategory. The information pertinent to the evaluation of the issues has been considered and incorporated in this report.

Interviews were conducted with top level people in the field, both inside and outside of TVA, to develop background data. This data, coupled with a review of current literature, provided an informational base sufficient to evaluate the issues.

### 2.3 Summary of Findings

The findings indirectly support the need for a more comprehensive drug testing program as a prudent precaution. No evidence of abuse of the EAP was found. The legality of random testing is a question that can be decided only by the courts.

### 2.4 Summary of Collective Significance

Although no evidence was found that employee drug use is currently a significant problem, prudence dictates that measures be taken to guard against drug abuse in the future. Failure to identify and reform drug abusers could lead to serious safety and morale problems at nuclear facilities.

#### 2.5 Summary of Causes

The current drug testing program is not perceived by the CIs as being comprehensive enough to catch or deter potential drug abusers.

REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 4 OF 13

### 2.6 Summary of Corrective Action

TVA's drug testing program will be expanded to include all employees, regardless of position. Random testing will be initiated for all personnel with unescorted access to vital plant areas. Training programs are being developed to increase the effectiveness of the Fitness for Duty program. Supervisors will be better trained in identifying and handling drug abusers. Employees will be better informed of the availability of the Employee Assistance Program and of the consequences of continued drug abuse.

#### 3.0 EVALUATION PROCESS

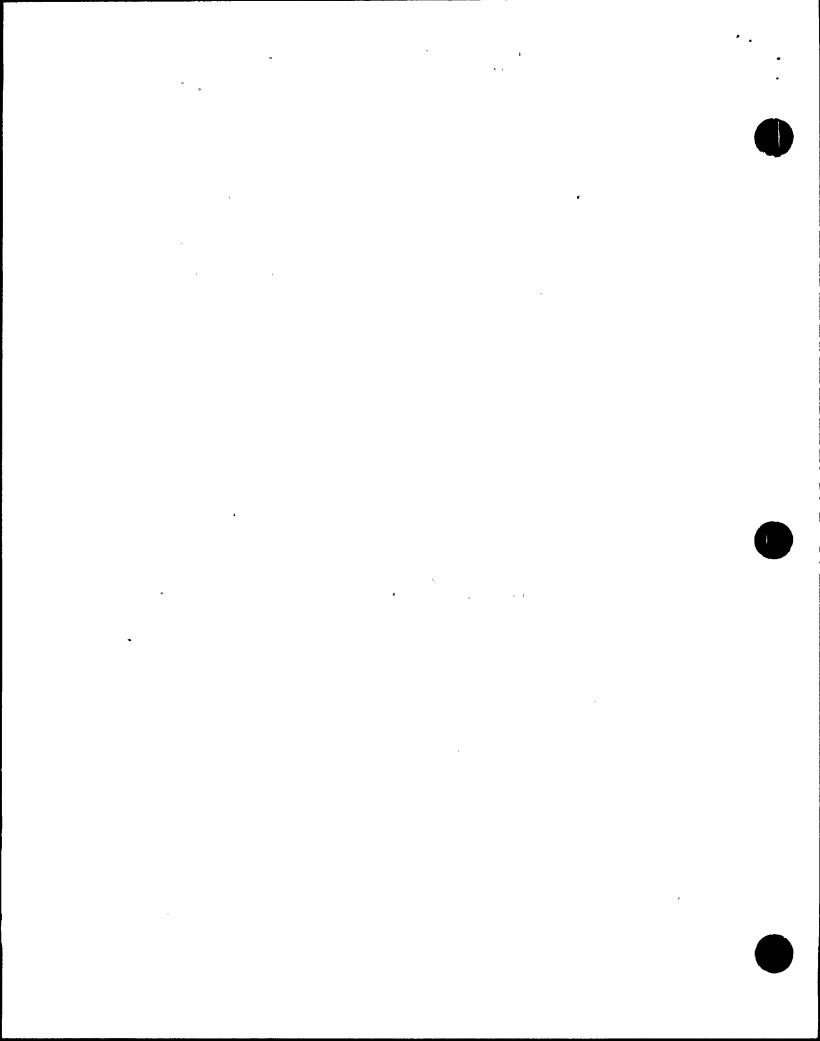
#### 3.1 General Methodology

The evaluation of this subcategory was conducted according to the Evaluation Plan for the Employee Concerns Task Group and The Evaluation Plan for the Hanagement and Personnel Category. The concern case files were reviewed. Source documents were reviewed to establish the regulatory requirements or management mandates that apply to the circumstances described in the issues covered in this subcategory. The issues were evaluated against the established requirements or management policies. From this evaluation, findings were determined. The findings were then analyzed for their collective significance. Causes were identified for the negative findings. The responsible organizations were identified and corrective actions were initiated for the negative findings.

#### 3.2 Specific Methodology

TVA's current drug testing requirements were compared to programs outside and inside the utility industry to establish TVA's position with respect to program implementation (See Attachment C for sources consulted).

Interviews were conducted with five TVA employees and one knowledgeable person outside TVA to gather background data and determine TVA's short and long-term approach to the drug use problem in the workplace (See Attachment C for a list of those interviewed). One line management investigative report was reviewed; its findings were in accord with the findings reported in section 4.0.



REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 5 OF 13

### 3.3 Investigative Focus for Each Issue

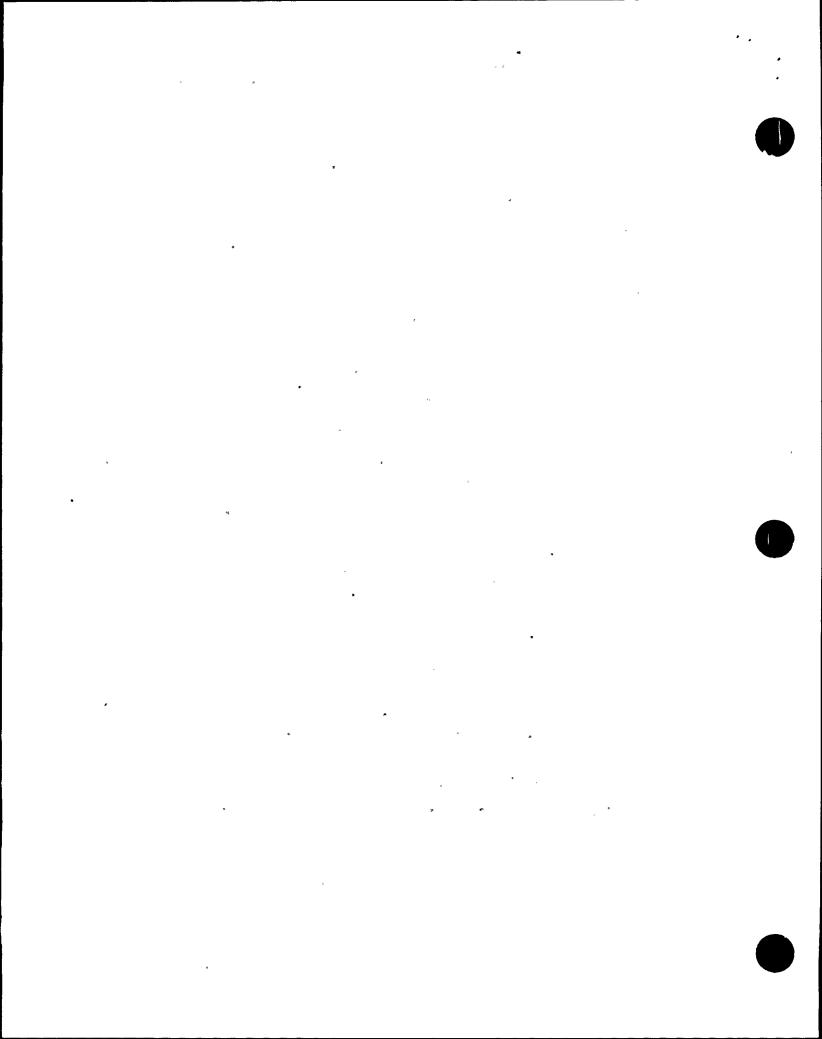
- 3.3.1 Issue 71401 Adequacy of Drug Testing Program
  - (a) What are the advantages/disadvantages of having random drug testing as a part of the drug program?
  - (b) Is there any evidence directly linking drug use to poor work quality and/or the creation of hazardous situations?
  - (c) What specifically do employees fear from identifying a drug user/abuser?
- 3.3.2 Issue 71402 Abuse of Employee Assistance Program (EAP)
  - (a) What are the controls to prevent participants in the EAP from continuing to use drugs?
  - (b) What controls exist that would prevent employees from continuing to use drugs while participating in a non-TVA drug abuse program?
  - (c) Are controls necessary to ensure that those in the EAP do not receive preferential treatment?
- 3.3.3 Issue 71403 Legality of Random Testing
  - (a) What is the legal opinion on random testing across the industry?
  - (b) What is TVA's position (per Office of General Counsel)?

### 3.4 Current ONP Drug Program Requirements

The requirements of the program (Nuclear Power Procedure 0905.01.04) currently in place within ONP state:

Discharge is the standard penalty for the illegal use, sale, or possession of narcotics, drugs, or controlled substances, while on the job or on TVA property.

Off-the-job illegal drug use which could adversely affect an employee's job performance or which could jeopardize the safety of other employees, the public, or TVA equipment is proper cause for disciplinary action up to and including termination.



REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 6 OF 13

When an employee is arrested for off-the-job drug activities, management will consider the underlying factual basis for the arrest in determining any disciplinary action or other action that may be warranted.

The drug and alcohol testing process used by ONP is handled as follows:

A. Testing is invoked in cases where there is reasonable suspicion that the employee is intoxicated or under the influence of drugs or alcohol. Reasonable suspicion is a belief based on behavioral observations sufficient to lead a prudent supervisor to suspect that the employee is under the influence of drugs or alcohol (e.g., slurred speech, alcohol on breath, inability to walk a straight line, and inattentive or inappropriate behavior).

#### B. Testing will be used routinely for:

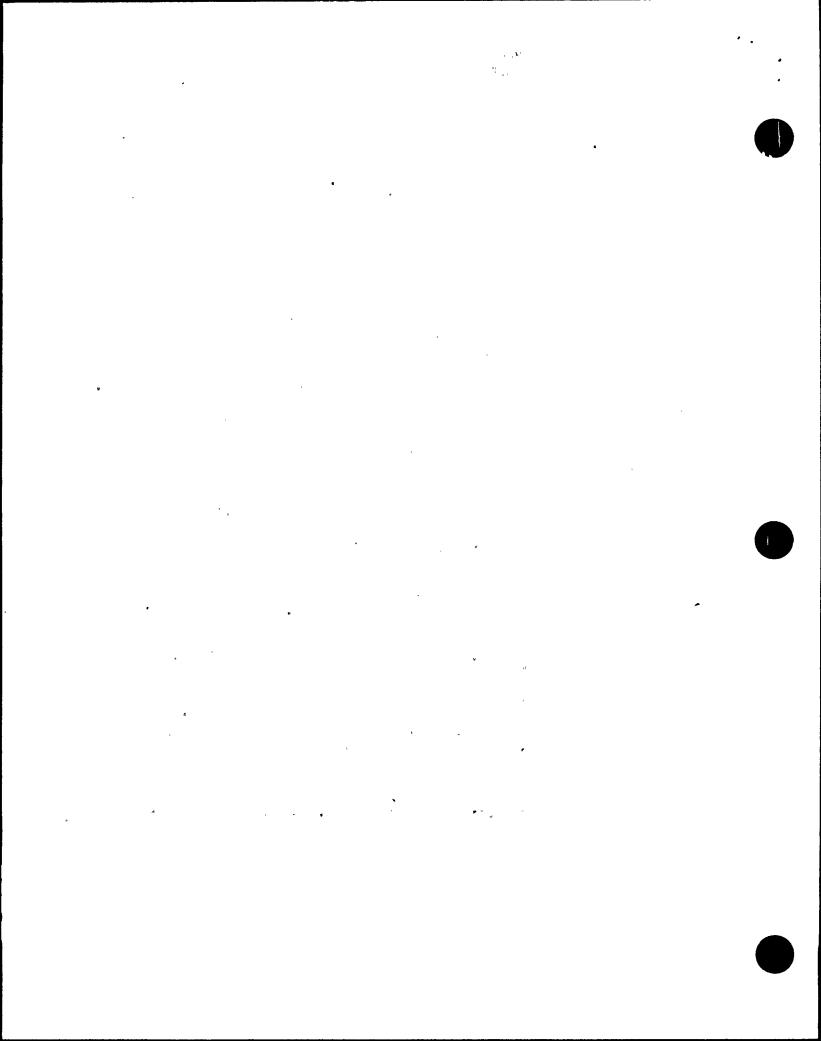
- Outside applicants and transferees into positions requiring unescorted access clearance.
- TVA employees who are being transferred and must obtain an initial unescorted access clearance.
- \* An employee who is suspected to be in possession of illicit drugs or alcohol or when illicit drugs or alcohol are found in an employee's workplace.
- Contractors or vendor employees requiring unescorted access clearance.

#### 4.0 FINDINGS

The discussion of the subject of a drug and alcohol testing program within TVA would probably be better understood in the context of recent activities and current ONP drug program requirements.

#### Before 1983, No Identification Program

Before 1983, TVA's work rules specifically prohibited the use of drugs onsite; however, there was no program in effect to identify drug users/abusers.



REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 7 OF 13

The initial exposure of TVA's nuclear program to comprehensive drug testing requirements was in October 1982, when the Nuclear Regulatory Commission (NRC) proposed their "Fitness for Duty Rule" to the nuclear industry.

#### Subsequent Milestones

Subsequent milestones in the last 43 months are as follows:

March 1983 - TVA implemented the Drug Awareness Program.

September 1983 - ONP supervisors were trained on policy and behavioral observation.

October 1984 - NRC decided to delay rule-making on fitness for duty for two years. TVA committed, with other utilities through Nuclear Utility Hanagement and Resource Committee (NUMARC), to have a basic Fitness for Duty Program implemented in its nuclear program by February 1985.

January 1985 - The Institute of Nuclear Power Operations (INPO) issued fitness for duty performance objectives in Performance Objectives and Criteria for Operating and Near-Term Operating License Plants.

August 1985 - INPO revised corporate fitness for duty performance objectives and criteria and issued <u>Performance</u> Objectives and Criteria for Corporate Evaluations.

Edison Electric Institute (EEI) revised and issued <u>EEI</u>
<u>Guide to Effective Drug and Alcohol Fitness for Duty</u>
<u>Policy Development</u>.

ONP changed the Drug Awareness Program to the Fitness for Duty Program and included alcohol and drug screening tests of prospective employees, which also included transfers, employees requesting initial clearance, and contractors.

Supervisory and Employee Training Programs were revised and retraining was initiated at all locations.

REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 8 OF 13

### 4.1 Generic Findings

4.1.1 Issue 71401 - Adequacy of Drug Testing Program

#### Discussion

### A. Need for Improved Testing Procedure

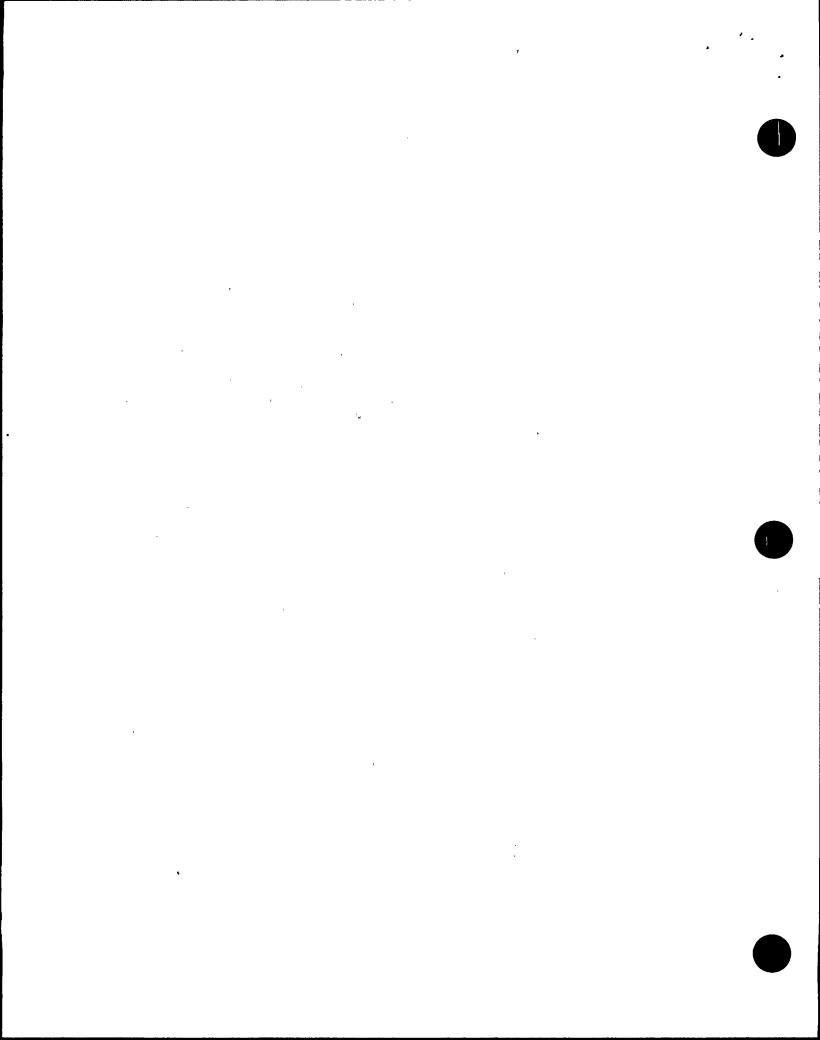
A study was done by an Edison Electric Institute (EEI) task force. The chairman was Michael R. Tuosto, Public Service Electric and Gas Company (PSE&G) general manager of personnel and equal opportunity. The study concluded that the utility industry was experiencing drug-related problems "no worse, but no better" than industry in general.

The consensus of the EEI task force, though not absolute, is that upwards of 7 percent of the nation's work force is involved with the misuse of drugs. Checks of potential employees at one major northern utility has revealed that 8 to 11 percent of new applicants were misusing drugs. TVA's experience with new applicants and transferring employees has been that 4 to 5 percent are drug abusers.

It is unclear why TVA's percentage of detected drug abusers is lower than the national average. It may be lower because the testing procedure is inadequate (as the CI's contend), but it may also be lower because TVA has fewer drug abusers.

ONP is developing a random drug testing program. It is more comprehensive in at least two areas than programs initiated by the Department of Defense (civilian employees), U.S. Air Force, U.S. Navy, South Carolina Electric & Gas, and Detroit Edison. The principal areas where ONP's program exceeds the others are in the number of employees to be tested and in the number of drugs that can be identified.

The programs of outside organizations used for comparison with ONP ranged from random screening of critical positions only, to testing all personnel annually. By inspection, the first situation would exclude quite a few employees and the second would not be particularly valid since all employees would know when their screening would be scheduled. ONP tests for seven (7) groups of drugs as compared to a cross-section of government and private companies that test for two (2).



REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 9 OF 13

Comparisons between various programs can be misleading and should be approached with some caution. However, such comparisons provide an additional perspective from which to gauge the overall merit of ONP's drug testing program.

### B. Plant Safety

The basis of most of the concerns about the drug testing program is that drug abuse could result in poor work performance. However, based on discussions with personnel officer(s) and construction management, no situations have been identified at WBN (where most of the concerns originated) in which any employee made a safety-related mistake or created a hazardous situation that could be attributed to drug use. Certainly, some employees have been detected as drug users and rehabilitated or released; nevertheless, their work records have not indicated any safety-related abnormalities.

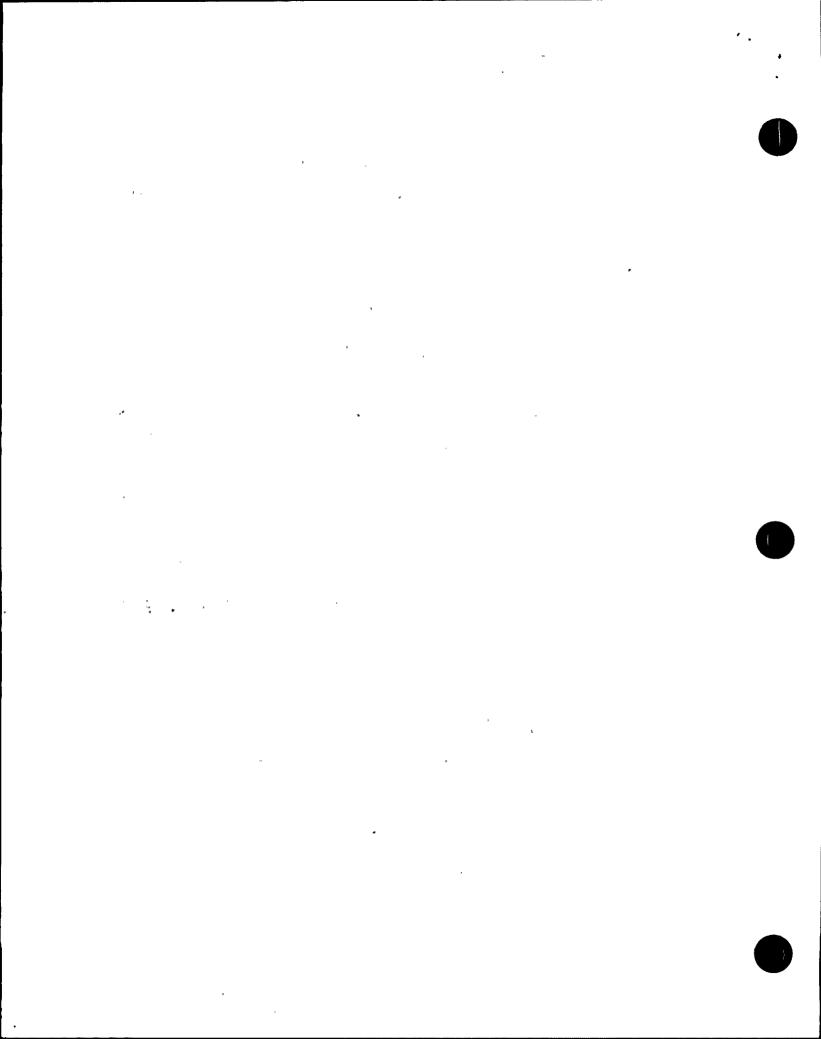
The possibility that the work records failed to document safety abnormalities is also being guarded against. An extensive study is being performed by a company called EG&G on the welding program at WBN; meanwhile, Stone and Webster Engineering Corporation (SWEC) is evaluating QA-related areas. Since these programs are comprehensive in nature, defective welds or inspections will be identified as a result of these efforts.

#### C. Fear of Reprisal

Employees are indeed reluctant to turn in fellow employees for drug abuse on the job. Discussions with a number of TVA employees have revealed that identifying fellow employees as drug users/abusers could mark them for retribution ranging from peer ostracism to unwarranted supervisory actions, depending on whom they identified. However, no specific instances of reprisals were found.

#### Conclusion

Efforts to combat drug use with the current level of testing (i.e., only on transfer or for initial clearance) were considered to be ineffective by the majority of concerned



REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 10 OF 13

individuals (CI's) who addressed this issue. This contention could not be verified as factually accurate. However, a random testing program currently under development should help strengthen the program and alleviate the perceptions of inadequacy (see section 7.1).

4.1.2 Issue 71402 - Abuse of Employee Assistance Program

#### Discussion

This issue raised three questions about the EAP.

A. Do employees in EAP continue to use drugs?

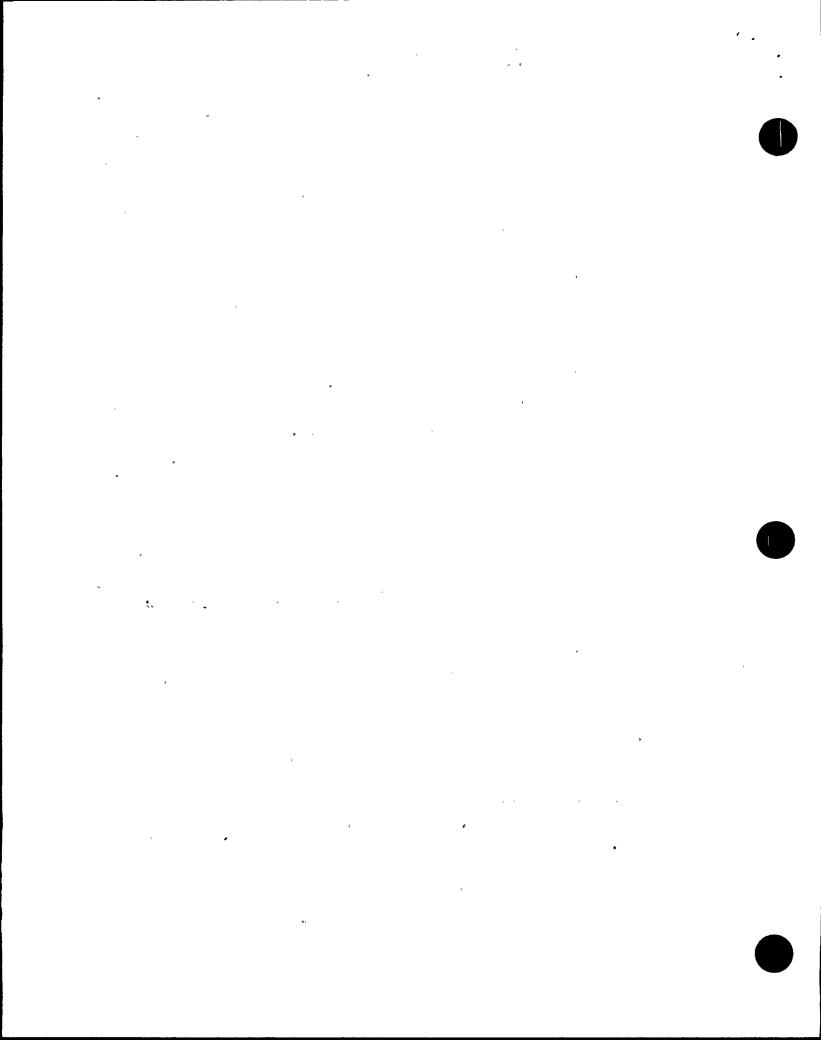
Controls to prevent employees in the EAP from continuing to use drugs are in place and are strictly enforced. They are described in the Division of Medical Services', Standardized Procedures for EAP Monitoring of Nuclear Power Employees after a Positive Drug Screen. An individual participating in the EAP would not be able to continue drug use for any length of time since a random screening program is initiated for each EAP participant and a second positive screening would result in the employee's immediate dismissal. Employees who participate in the drug abuse program are well aware of the restrictions they are subject to and, in fact, must sign a statement that outlines those restrictions.

B. Can employees in outside drug programs still use drugs?

Employees can participate in a drug abuse program without TVA's knowledge; however, if they communicate this information to their supervisor for any reason, they will be referred by the supervisor to the EAP counselor for an interview to assess the quality of the employee's involvement with his/her program. The fact that an employee would then be associated with drug use and possibly be required to submit to a drug screen should provide a sufficient deterrent to prevent employees from using their involvement in an outside program as an excuse to continue to use drugs.

C. Do employees in the EAP receive preferential treatment?

Controls that govern the retention of employees during layoffs are negotiated as part of the contracts TVA has with the various unions.



REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 11 OF 13

The personnel groups that develop seniority lists during layoffs are not informed of an employee's participation in the EAP. In fact, the names of EAP participants are kept confidential. Under these circumstances it would be impossible to favor one employee or group of employees over another.

#### Conclusion

The issue of abuse of the EAP could not be verified as factually accurate. However, the questions raised do reveal a lack of understanding by employees of how the EAP works.

### 4.1.3 Issue 71403 - Legality of Random Testing

#### Discussion

The opponents of random testing point to a citizen's right to avoid "search without probable cause" by a government agency. The Constitution of the United States prohibits governmental organizations from imposing "searches" on private citizens without probable cause. Nongovernmental organizations will not have to defend their actions on this point; however, they will be required to offer a defense against the "invasion of privacy" argument. TVA will probably be required to defend its actions in both areas.

TVA's Office of General Counsel is currently evaluating these questions. The final determination should eventually be made by the courts.

#### Conclusion

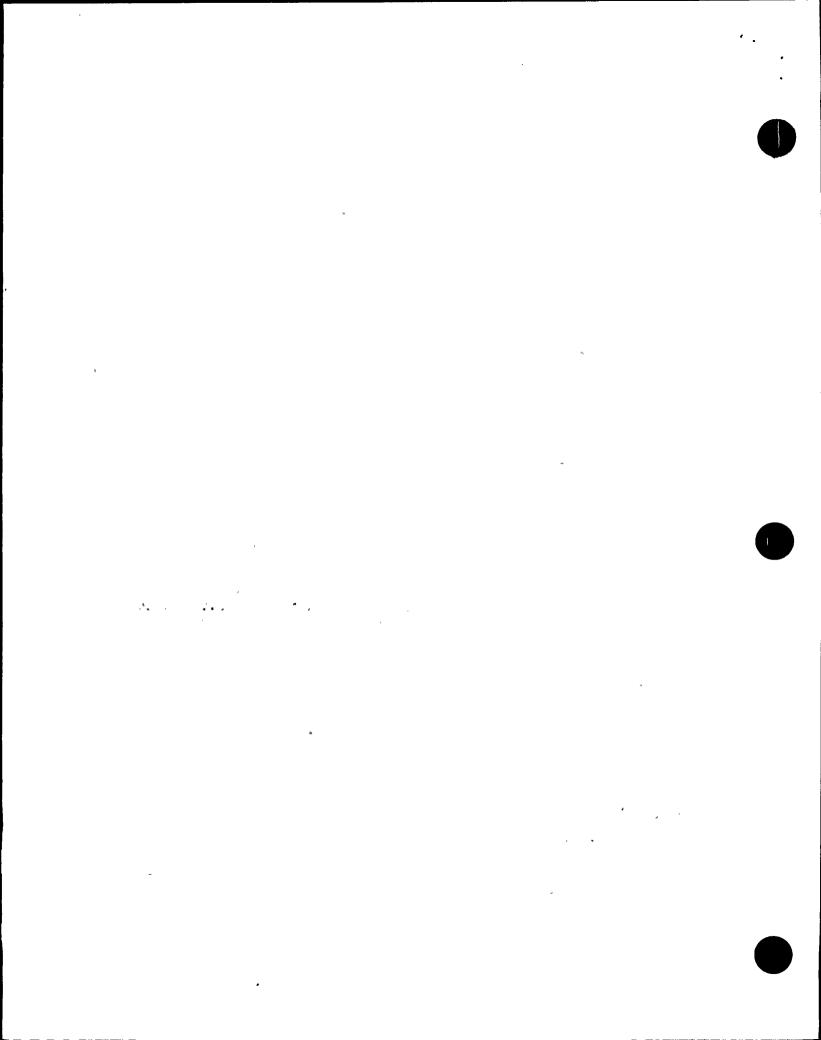
This issue could not be verified as factually accurate.

#### 4.2 Site-Specific Findings

None.

#### 5.0 COLLECTIVE SIGNIFICANCE

The Employee Concerns Special Program has received a total of 23 concerns about the use and control of drugs and alcohol at WBN and other ONP



REPORT NUMBER: 71400

**REVISION NUMBER: 3** 

PAGE 12 OF 13

sites. Since there were over 5,000 concerns from over 2,000 individuals, one might fairly conclude that drug and alcohol abuse is not seen as a serious problem by ONP employees. However, prudence dictates that measures be taken to make sure that a problem in this area does not develop in the future. That need for prudence accounts for two potential problem areas that became apparent through the evaluation of this subcategory.

- (1) Management effectiveness in identifying drug users/abusers in the workplace has historically been poor throughout the nation. A more impersonal and objective approach to this process is badly needed. Managers and supervisors also need more training in the identification and handling of apparent drug users/abusers. However, the determination that an employee is a drug abuser is a professional clinical judgment to be made by medical personnel.
- (2) Employee effectiveness is impeded if nonusers perceive that management tolerates or ignores drug abuse. A drug abuse program widely perceived as effective helps nonabusers' morale even as it protects against the possibility of bad work by actual abusers.

#### 6.0 CAUSES

#### 6.1 Perception of Inadequate Drug Testing Procedures

The drug testing procedures in place at the time these concerns were filed were not perceived as comprehensive enough to detect all drug abusers quickly. Consequently, the procedures were not seen to be an effective deterrent to potential drug use on the job.

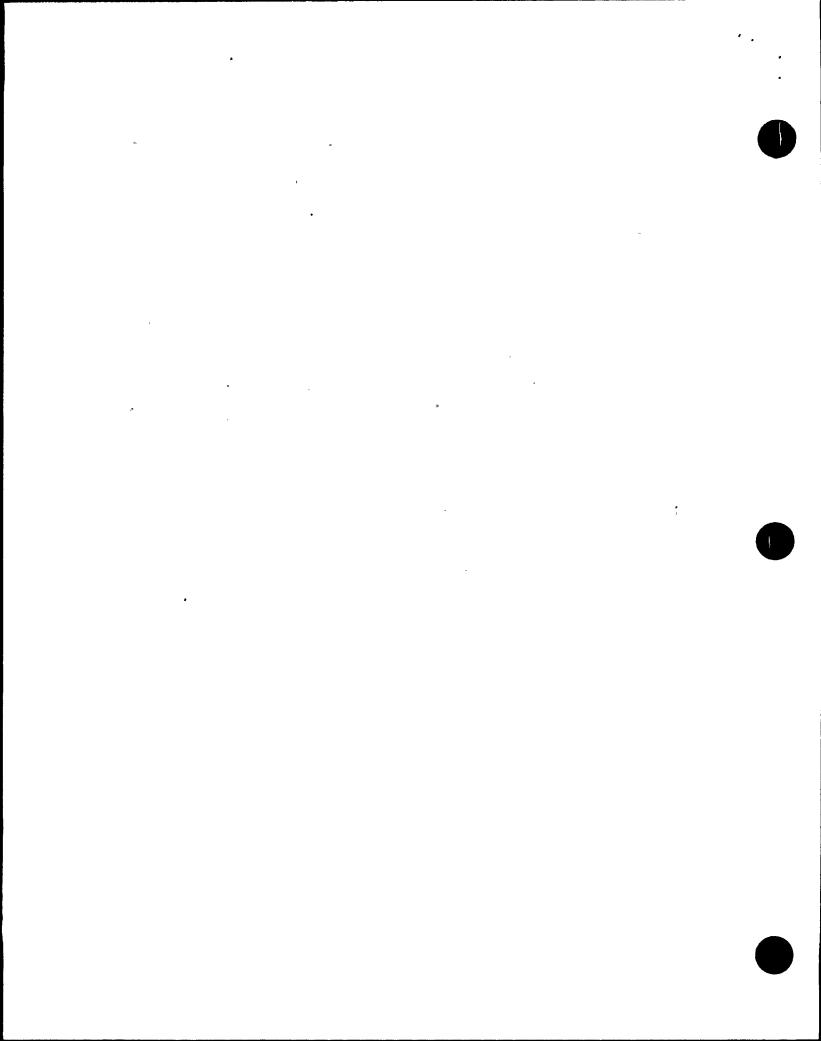
#### 6.2 Misunderstanding of the EAP

The Employee Assistance Program (EAP) is intentionally promoted and administered to maintain a low profile. A consequence of this approach is inadequate awareness on the part of employees about the program and the rules that govern it. However, some responsibility for this lack of awareness must be borne by the employees since the information is readily available.

#### 7.0 CORRECTIVE ACTION

### 7.1 Previously Initiated Corrective Action

A random drug testing program for all personnel with clearance to work unescorted in vital plant areas is under development. The



REPORT NUMBER: 71400

REVISION NUMBER: 3

PAGE 13 OF 13

research of drug testing programs undertaken for this evaluation argues that such a program will both control drug abuse and be perceived as effective by most personnel. Should random drug testing be disallowed by the courts, however, other means must be found to assure employees and the public that ONP's nuclear facilities are constructed and operated in a drug free work environment (CATD 714-NPS-O1).

#### 7.2 Corrective Action Resulting from This Evaluation

The ONP Training and Development Staff is revising the training previously administered under the former Drug Awareness Program. Training on the Employee Assistance Program will be made a part of General Employee Training (GET 3.1) for all nuclear plant personnel. The revised program will include content on the rules which govern the EAP and training on the behavioral changes in employees which should be recognized and reported to supervisors. The Power Operations Training Center (POTC) staff is coordinating the new GET 3.1 curriculum (CATD 714-NPS-02).

#### 8.0 ATTACHMENTS

Attachment A, Subcategory Summary Table

Attachment B, List of Concerns by Issue

Attachment C, List of Interviews and Supporting Documents

FERENCE - ECPS132J-ECPS132C EQUENCY - REQUEST P - ISSS - RHM

# TENNESSEE VALLEY AUTHORITY OFFICE OF NUCLEAR POHER EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS) EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY SUBCATEGORY: 714 ADEQUACY OF DRUG TESTING PROGRAM

PAGE - 1 RUN TIME - 10:04:39 RUN DATE - 03/10/87

> REF. SECTION I CAT - MP SUBCAT - 714

EGORY: MP MGT. & PERS. ISSUES

ONCERN NUMBER	CAT	SUB CAT	S H R PLT D LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ WB		CERN GIN CONCERN DESCRIPTION
-85-030-00101 T50131	IH	60400	S WBN	1 2	QТ	ABOUT AND DISCUSSING DRUGS ON THE JO
02	MP	71401	S WBN	I N N N N 2 NA NA NA NA	·	B. CI EXPRESSED THAT THIS COULD HAV E ADVERSELY AFFECTED THE QUALITY OF SOME MELDING. NO SPECIFICS ARE AVAI LABLE FROM CI. TIME FRAME OF CONCER N: JULY/AUG. '85. CI HAS NO ADDITIONAL INFORMATION.
-85-117-00401 T50200 <u>į</u>	МР	71401	N WBN	1 N N N N 2 NA NA NA NA	qτ	REACTOR OPERATORS SHOULD HAVE TO GO THROUGH CHEMICAL TESTS AND BLOOD TES TS MONTHLY. NUCLEAR POWER CONCERN. CI HAS NO ADDITIONAL INFORMATIONGENERIC CONCERN-
86-111-BFN 01	IH	60300	S BFN	1 Y N N N 2 NO NA NA NA	NS	RS CITIZEN ACTION LINE CALL ALLEDGING C OCAINE USE AT BFN. CALL REFERRED TO OGC BY INFORMATION OFFICE. NSRS DO
02	MP	71401	S BFN	I N N N N 2 NA NA NA NA		ES NOT CONSIDER THIS TO BE SAFETY-RE LATED AND DOES NOT PLANT TO INVESTIG ATE SINCE OGC IS HANDLING THE EMPLOY EE MISCONDUCT.
86-112-SQN 01	IH	60300	s sqn	1 N N Y N 2 NA NA NO NA	เเร	RS ANONYMOUS CALL REPORTED DRUG DEALING AT SQN TO CITIZEN ACTION LINE. CRA VEN CROWELL FORWARDED TO OGC AND MSR
02	MP	71401	S SQN	1 H H H H 2 HA HA HA		S. NSRS DOES NOT CONSIDER THIS A SA FETY-RELATED CONCERN AND IS NOT PLAN NING AN INVESTIGATION AT THIS TIME.
I -85-004-00401 T50015	MP	71401	и мви	1 N N N N 2 NA NA NA NA	QT	C HIDESPREAD DRUG USE BY HORKERS AT HA TTS BAR, BOTH UNITS, ESPECIALLY BY T VA MANAGEMENT AND CRAFT SUPERVISION. NO SPECIFICS OR NAMES GIVEN.

Į<sub>1</sub>F ÷ **>** 

FERENCE - ECPS132J-ECPS132C EQUENCY - REQUEST P - ISSS - RWM

### TENNESSEE VALLEY AUTHORITY OFFICE OF NUCLEAR POWER EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS) EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY SUBCATEGORY: 714 ADEQUACY OF DRUG TESTING PROGRAM

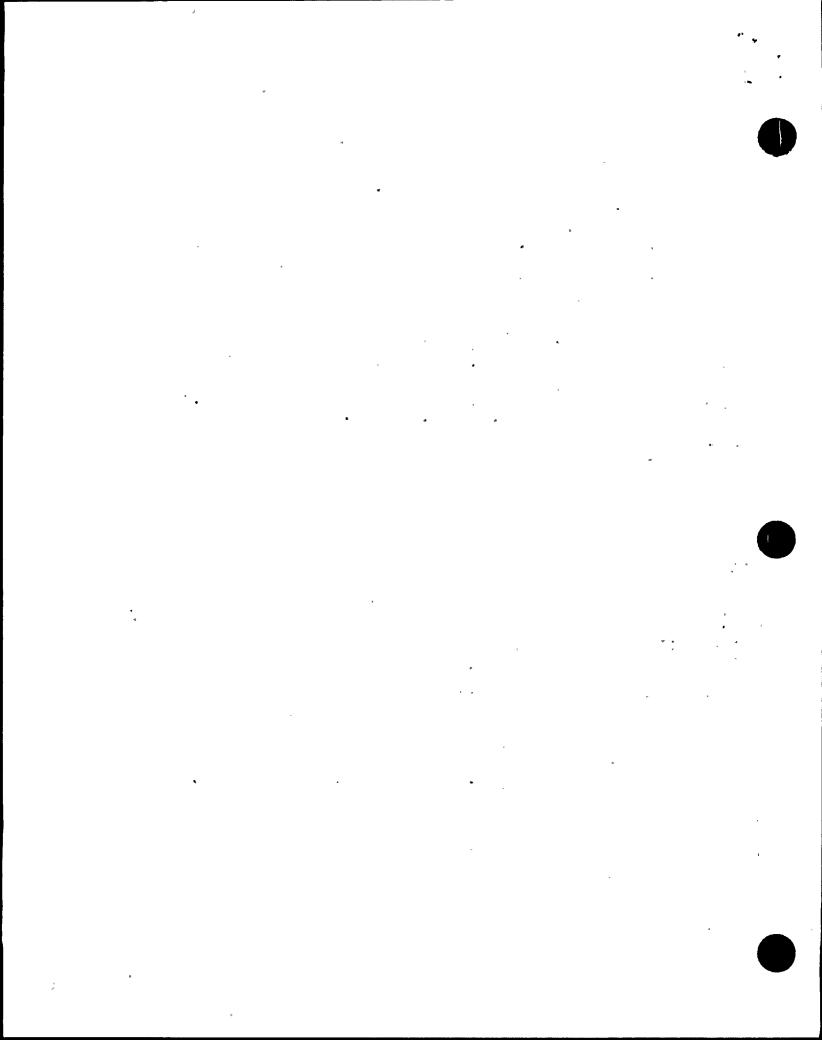
PAGE - 2 RUN TIME - 10:04:39 RUN DATE - 03/10/87

EGORY: MP MGT.	& PE	RS. ISS	UES	SUBCATEGORY: 714 ADEQUACY OF DRUG TESTING PROGRAM				
ONCERN NUMBER	CAT	SUB CAT	S H R PLT D LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ MB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION CAT - MP SUBCAT - 714
-85-041-00201 T50198	IH	60400	ѕ иви	1 2	EX-85-052-005	QTC	SUPERVISION IGNORING UNAUTHORIZED ME DICATION ON-SITE RESULTING IN INDIVI DUALS NOT BEING ABLE TO PERFORM REQU	<
02	MP	71401	<b>S ИВ</b> М	AN AN AN S	•		TRED TASKS. IE: OTHERS ARE REQUIRED TO TAKE UP SLACK BECAUSE AN INDIVID UAL IS SO HEAVILY DRUGGED THAT IF THEY WENT INTO THE FIELD THEY WOULD HURT THEMSELVES OR OTHERS. CONSTRUCTION DEPT. CONCERN. CI DECLINED TO PROVIDE ANY FURTHER INFORMATION.	
-85-272-00501 T50240	IH	60300	S WBN	1 2		QTC	CONSTRUCTION WORKERS (CRAFT KNOWN) R EPORT TO WORK UNDER THE INFLUENCE OF DRUGS. THEY ARE ALLOWED TO CONTINU	
02	MP	71402	S WBN	1 H N H N 2 HA NA HA NA			E WORKING AND TO CONTINUE USING DRUG S IF THEY TELL TVA THAT THEY ARE ENR OLLED IN A DRUG ABUSE PROGRAM. TVA SHOULD SCREEN EVERYONE ON SITE, BUT INSTEAD OF KEEPING GOOD WORKERS AT L	

1 -85-294-00301 IH 60300 S WBN 1 2 QTC T50258 2 02 MP 71401 S WBN 1 N N N N 2 NA NA NA NA

CONTROLLED SUBSTANCES ARE USED WIDEL
Y AT MBNP, BUT AT PRESENT EMPLOYEES
WHO ARE WORRIED ABOUT REPRISALS ARE
RELUCTANT TO CONTACT PUBLIC SAFETY W
ITH SPECIFIC AND TIMELY INFORMATION.
ALSO, SCREENING FOR DRUGS HAS NOT
BEEN EXTENDED TO ALL EMPLOYEES. THE
PROPER USE OF CONTROLLED SUBSTANCES
COULD HURT PLANT SAFETY IF PERSONNE
L PERFORMING KEY FUNCTION HAVE SLONE
D ACTIONS OR DISORIENTATION. CI HAS
NO FURTHER INFORMATION OR SPECIFICS
. NUCLEAR POWER CONCERN.

AY OFF TIME, TVA KEPT THE SUBSTANCE ABUSERS. CI DECLINED TO PROVIDE FUR THER INFORMATION. CONSTRUCTION DEPT. CONCERN. NO FOLLOW UP REQUIRED.



FERENCE - ECPS132J-ECPS132C EQUENCY - REQUEST P - ISSS - RHM

## TENNESSEE VALLEY AUTHORITY OFFICE OF NUCLEAR POWER EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS) EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY SUBCATEGORY: 714 ADEQUACY OF DRUG TESTING PROGRAM

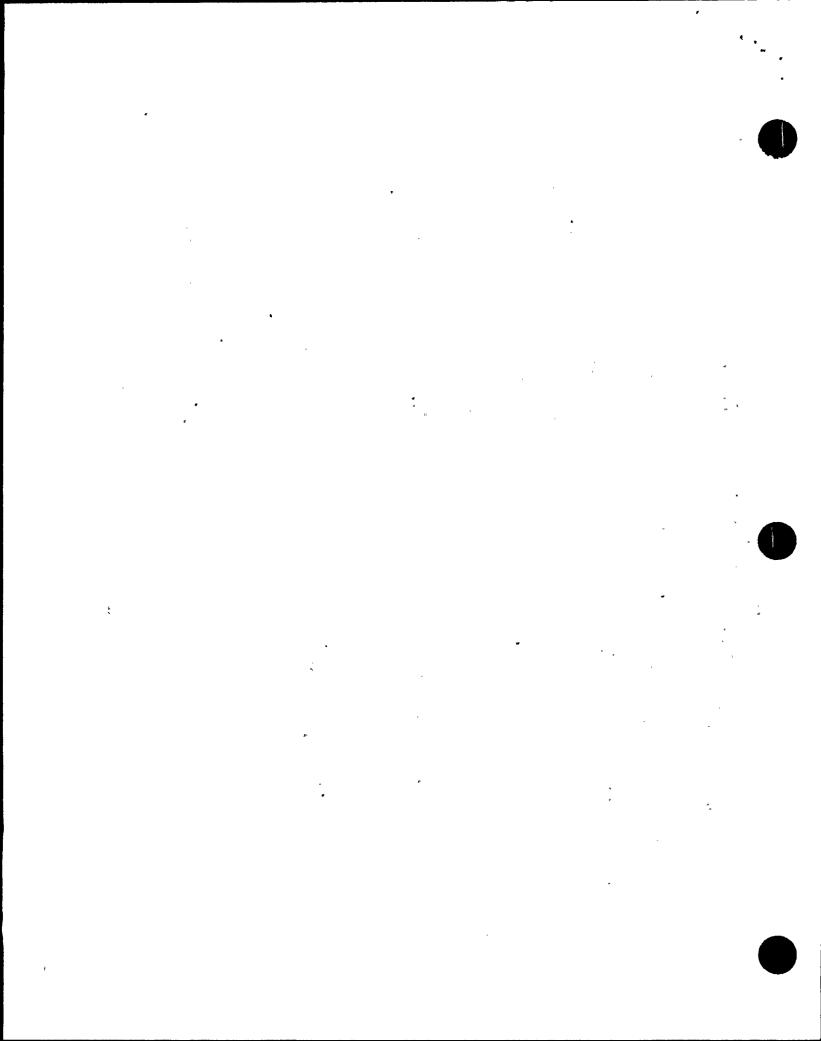
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> REF. SECTION : CAT - MP SUBCAT - 714

EGORY: MP MGT. & PERS. ISSUES

ONCERN NUMBER	CAT	SUB CAT	S H R PLT D LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ WB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	1
-85-408-00101 T50022	MP	71401	н ивн	1 H H H H 2 HA HA HA HA		QTC	INDIVIDUAL HAD A GENERIC CONCERN ABO UT "POT" SMOKING ON-SITE. INDIVIDUA L RELATED INCIDENT WHEREIN "POT" WAS BEING USED (NOTICED SMELL - NEVER S AW USAGE). INDIVIDUAL WAS WITH GENE RAL FOREMAN & AFTER A SEARCH THEY COULD NOT LOCATE SOURCE	
-85-473-00101 T50037	MP	71401	н ивн	1 H H H N 2 HA HA HA		QTC	ALL EMPLOYEES SHOULD HAVE BLOOD/URIN E TESTS TO DETECT USERS OF CONTROLLE D SUBSTANCES.	
-85-551-00101 T50049	MP	71401	н шви	1 H N H N 2 HA NA HA NA		QTC	THERE SHOULD BE A DRUG PROGRAM FOR E MPLOYEES AT WATTS BAR.	
-85-558-00101 T50048	MP	71401	н ивн	1 H H H H H H A HA		QTC	DRUG TESTING SHOULD BE INITIATED AT WBNP.	
-85-663-00401 T50238	IH	60300	S WBN	1 2	IN-85-663-004	QTC	TVA'S UPPER MANAGEMENT (OFF-SITE) HAS ONLY PERMITTED SCREENING NEW HIRES, TRANSFERS AND RE-HIRES FOR DRUGS A	
	MP	71401	S WBN	1 N N N N 2 NA NA NA			ND ALCOHOL. DESPITE RULES PROHIBITI NG ALCOHOL AND DRUGS, THEY ARE MIDEL Y AVAILABLE ON SITE AT WBNP, BECAUSE PUBLIC SAFETY DOES NOT CHECK LUNCH BOXES AT THE BEGINNING OF THE SHIFT. WHEN A PUBLIC SAFETY OFFICER REPOR TED LIQUOR IN AN EMPLOYEE'S CAR, HE WAS TRANSFERRED AND THE OFFENDER CON TINUED TO WORK FOR TVA. CO-WORKERS COVER UP FOR CHRONIC SUBSTANCE ABUSE RS AND MANAGEMENT TOLERATES OPEN	
1 -85-750-00201 T50077	MP	71401	и иви	1 H H H H N 2 HA NA HA NA		QTC .	TVA SHOULD TEST ALL PERSONNEL FOR DR UG USAGE.	





FERENCE - ECPS132J-ECPS132C EQUENCY - REQUEST FOR THE PROPERTY - ISSS - RIMM

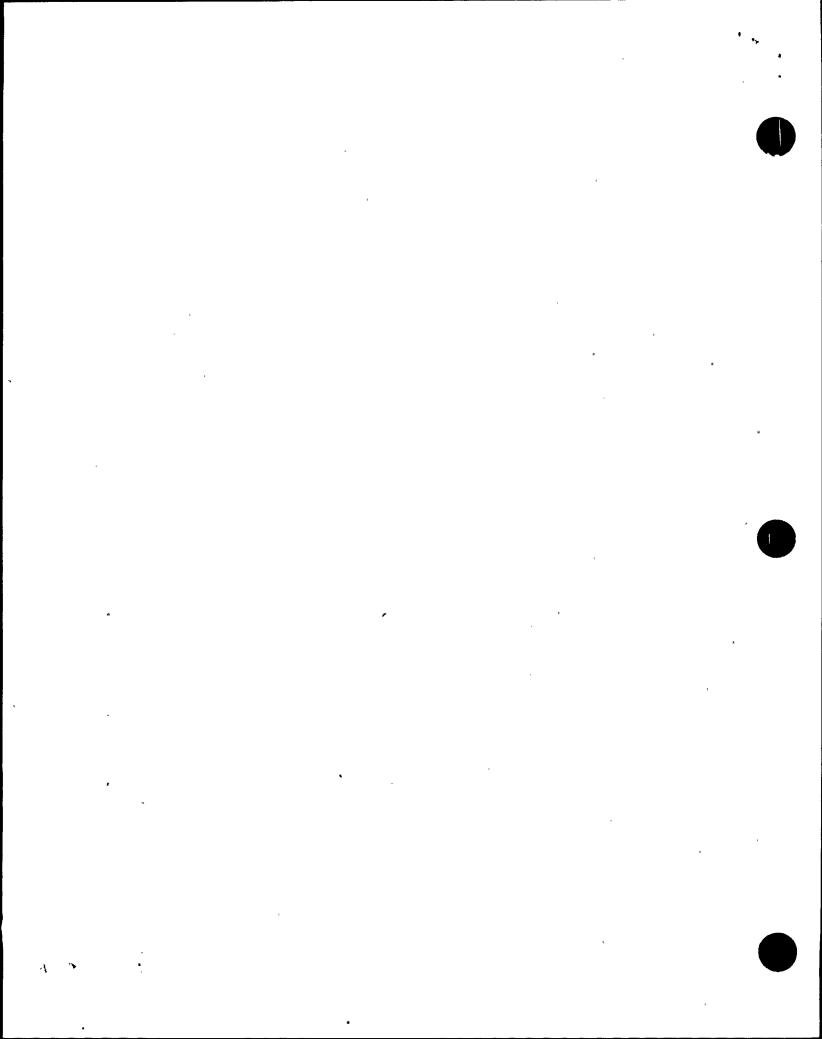
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EGORY: MP MGT. & PEKS. ISSUES

TENNESSEE VALLEY AUTHORITY
OFFICE OF NUCLEAR POWER
EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
SUBCATEGORY: 714 ADEQUACY OF DRUG TESTING PROGRAM

DICERN NUMBER	CAT	SUB CAT	S H R PLT D LOC	1 REPORT A 2 SAF RELA BF BL SQ	ATED HISTORICAL	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION F CAT - MP SUBCAT - 714
-85-871-00101 T50255	MP		н <b>ывн</b> •	1 H H H AH 2 HA	NA NA	QTC	CI FEELS A DRUG SAMPLING PROGRAM FOR MBNP WOULD IMPROVE THE NOTICEABLE DRUG PROBLEM IN THE FIELD. NO SPECIFICS PROVIDED. NUCLEAR POWER DEPARTMENT CONCERN. NO ADDITIONAL INFORMATION AVAILABLE IN FILE.	
-85-947-X0901 T50233	МР	71401	н ивн	1 H H H 2 HA HA HA	NA NA	QTC	SOME OF THE PEOPLE IN UPPER MANAGEME NT (NAMES KNOWN) HAVE ALCOHOLIC PROBLEMS. THEY ARE SUPPOSED TO SET AN EXAMPLE TO EMPLOYEES. THEY ARE UNQUALIFIED TO HOLD THEIR POSITIONS CONSTRUCTION DEPARTMENT CONCERN. CI HAS NO FURTHER INFORMATION. NO FOLLOW UP REQUIRED.	
-85-954-00201 T50104	MP	71403	н иви	1 H H H 2 HA HA HA	N NA	QTC	MANDATORY URINALYSIS TESTS ARE AN IN VASION OF INDIVIDUAL'S PRIVACY. AN INDIVIDUAL SHOULD ONLY BE MADE TO TA KE THESE TESTS IF THEY ARE SUSPECTED OF DRUG/ALCOHOL ABUSE. CI HAS NO M ORE INFORMATION. NO FOLLOW UP REQUIRED.	
· -86-082-00101 T50117	MP	71401	и иви	1 H N N 2 HA HA NA	N NA	qтс	THE USE OF DRUGS ON SITE AND THE LAC K OF CONTROL OF DRUGS IS A CONCERN. CI HAS NO MORE INFORMATION. NUCLEA R POWER CONCERN. NO FOLLOW UP REQUIRED.	
: -86-293-00101 T50151	МР	71401	и иви	1 H N N 2 HA NA HA	A NA ·	<b>QТС</b>	CI FEELS THE USE OF MARIJUANA AND OT HER DRUGS IS UNSAFE IN THE WORK PLACE. CI HAD DETECTED THE PRESENCE OF MARIJUANA IN THE PLANT AND SUSPECTS THE USE OF OTHER DRUGS. CI FEELS A PROGRAM FOR SCREENING DRUGS WOULD IM PROVE THE EXISTING CONDITION IN THE PLANT. CI HAS NO ADDITIONAL INFORMATION. CONSTR. DEPT. CONCERN. NO FOLLOWUP REQUIRED.	





FERENCE - ECPS132J-ECPS132C EQUENCY - REQUEST - ISSS - RWM

#### TENNESSEE VALLEY AUTHORITY OFFICE OF NUCLEAR POWER EMPLOYEE CONCERN PROGRAM SYSTEM (E

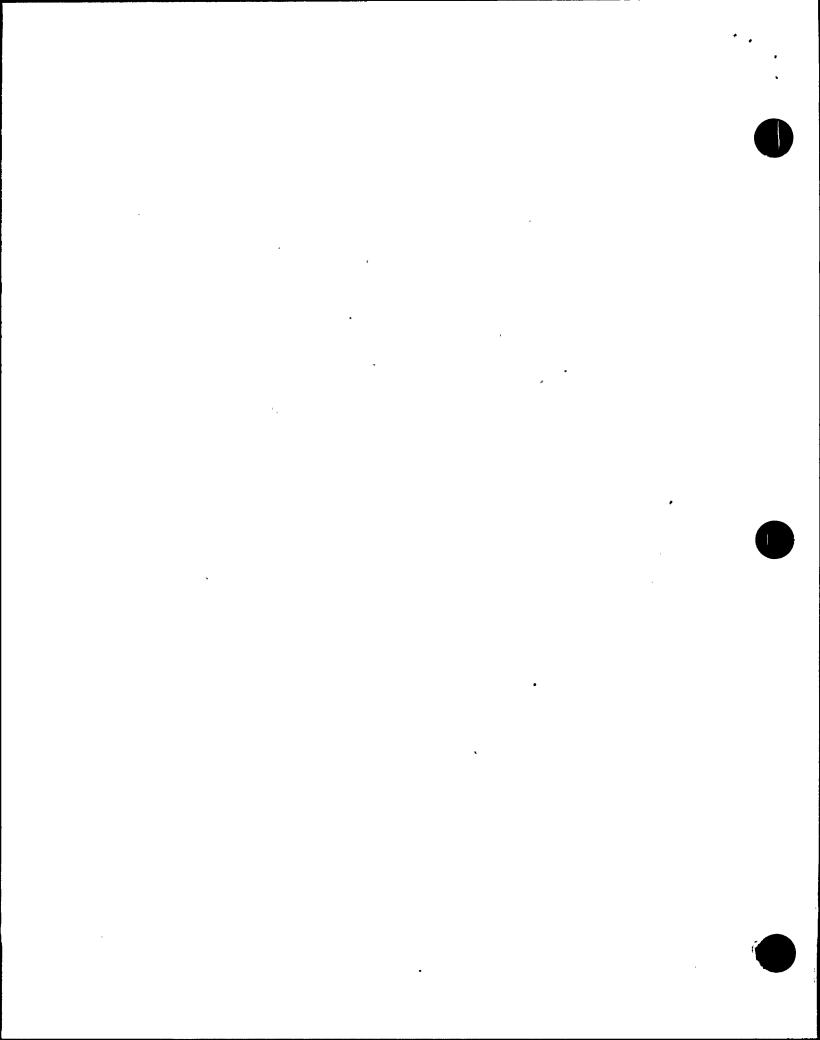
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EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
EMPLOYEE CONCERN INFORMATION BY CATEGORY/SUBCATEGORY
SUBCATEGORY: 714 ADEQUACY OF DRUG TESTING PROGRAM

ONCERN NUMBER	CAT	SUB CAT	S H R PLT D LOC	1 REPORT APPL 2 SAF RELATED BF BL SQ HB	HISTORICAL REPORT	CONCERN ORIGIN	CONCERN DESCRIPTION	REF. SECTION & CAT - MP SUBCAT - 714
4-86-013-00301 T50275	MP	71401	и мви	1 N N N N 2 NA NA NA NA		QTC	A SPECIFIC EMPLOYEE (NAME KNOWN) IS AN ALCOHOLIC, ILLITERATE, AND INCOMPETENT. NUCLEAR POWER CONCERN. CI HAS NO FURTHER INFORMATION.	
-85-071-00101 T50168	MP	`71401 ·	и мви	1 N N N N N N N N N N N N N N N N N N N		QTC	CI REPORTED THERE IS WIDESPREAD DRUG USE AND SALE OF DRUGS ON SITE. CI SUGGESTED TVA PERFORM URINANALYSIS TESTS ON ALL TVA EMPLOYEES (INCLUDING ALL MANAGEMENT) WITH NO PRIOR MARNING GIVEN TO EMPLOYEES. CI FURTHER SUGGESTED URINANALYSIS TESTS BE GIVEN CONTINUALLY ON A RANDOM BASIS WITH NO PRIOR MARNING. NUCLEAR POMER CONCERN. (DEPT. KNOWN TO QTC AND WITHH ELD TO MAINTAIN CONFIDENTIALITY). CI HAS NO FURTHER INFORMATION. NO FOLLOWUP REQUIRED.	
-85-081-01001 T50237	MP	71401	н нви	1 H H H H 2 HA NA HA HA		QTC	CI STATED THAT SEVERAL HELDING INSPECTORS STAYED HIGH ON POT DURING THE SHIFT. CI DECLINED TO PROVIDE ANY ADDITIONAL INFORMATION. CONSTRUCTION DEPARTMENT CONCERN. NO FOLLOW UP REQUIRED.	
-85-065-00201 T50159	IH	60400	S BFN	1 N N N N 2		QTC	DURING SUMMER 1983 OUTAGE AT BROWNS FERRY, C/I OBSERVED ISI INSPECTORS ( NAME KNOWN) IN BASE LINE GROUP COMIN G TO WORK DRUNK OR EXTREMELY HUNG OV ER. C/I FEELS THIS SITUATION CASTS	
02`	MP	71401	S BFN	1 H H H H 2 NA HA NA HA				
03	QA	80209	S BFN	I Y N N N 2 NO NA NA NA	•		DOUBT ON THE INSPECTIONS PERFORMED BY THESEISI INSPECTORS. SUPERVISOR OF GROUP (NAME KNOWN), ALSO A HEAVY DRINKER, ALLOWED THIS TO GO ON. CONSTRUCTION DEPT. CONCERN. C/I WOULD NOT PROVIDE ANY ADDITIONAL SPECIFICS. NO FOLLOWUP REQUIRED.	

23 CONCERNS FOR CATEGORY MP SUBCATEGORY 714





#### ATTACHMENT B

#### DRUGS

#### List of Concerns by Issue

This Subcategory Report (71400) addresses 23 employee concerns about the use and control of drugs at Watts Bar Nuclear Plant. These concerns raised three issues, as outlined below.

71401 - Adequacy of Drug Testing Program

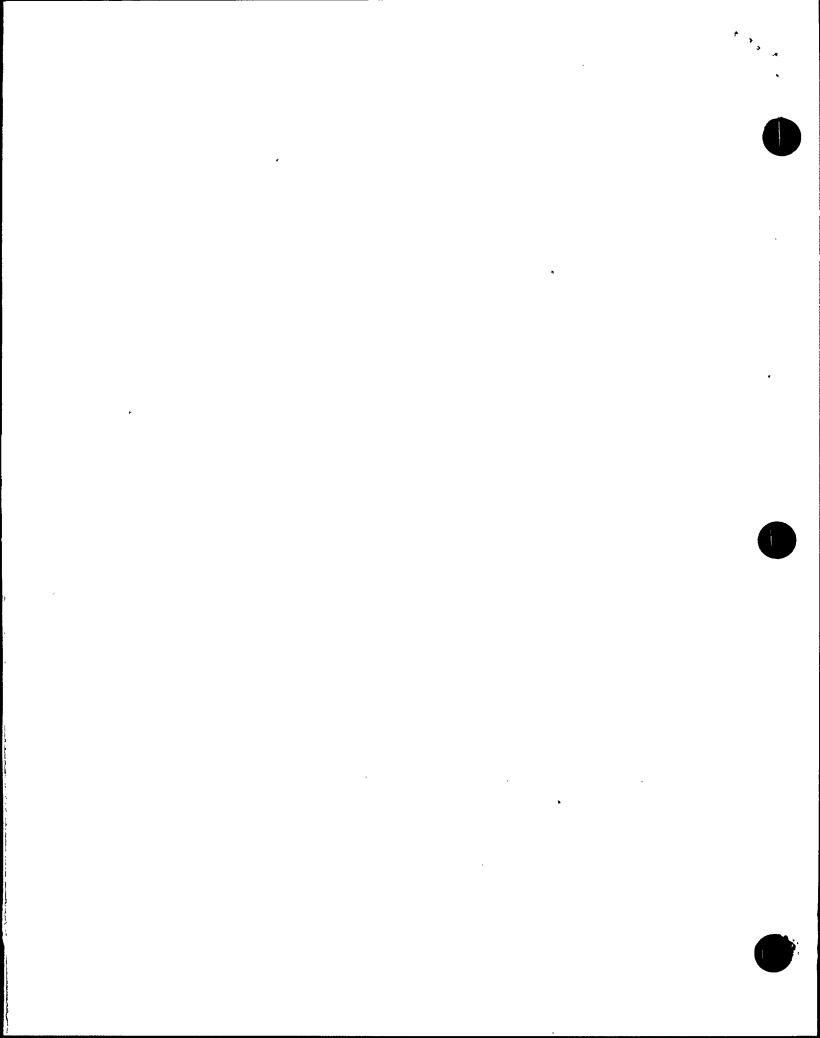
EX-85-030-001	IN-85-663-004
EX-85-117-004	IN-85-750-002
I-86-111-BFN	IN-85-871-001
I-86-112-SQN	IN-85-947-X09
IN-85-004-004	IN-86-082-001
IN-85-041-002	IN-86-293-001
IN-85-294-003	WBM-86-013-003
IN-85-408-001	WI-85-071-001
IN-85-473-001	WI-85-081-010
IN-85-551-001	XX-85-065-002
IN-85-558-001	

71402 - Abuse of Employee Assistance Program

IN-85-272-005

71403 - Legality of Random Testing

IN-85-954-002



### ATTACHHENT C

#### Supporting Documents

- 1.1 TVA Code VIII, HEALTH SERVICES
- 1.2 TVA Instruction III, ALCOHOL AND DRUG ABUSE
- 1.3 Edison Electric Institute Guide to Drug and Alcohol/Fitness for Duty Policy Development, 1985
- 1.4 Informal memorandum, from L. O. Holliman to C. C. Mason, dated January 13, 1986
- 1.5 Nuclear Power, Alcohol and Drug Screening Program Procedure 0905.01.04
- 1.6 Memorandum from L. O. Holliman to C. C. Mason, dated January 17, 1986 (L0786001109530)
- 1.7 Medical Services, Standardized Procedures for Employee Assistance Program (EAP) Honitoring of Nuclear Power Employees After A Positive Drug Screen
- 1.8 NUMARC Commitments on Fitness For Duty as presented by memorandum from Jack T. Pate, INPO, to James P. Darling, dated November 20, 1984
- 1.9 WBN Standard Practice, WB2.2.3, Section C, "Drug Awareness Program"

#### Interviews

- 2.1 Dr. Richard K. McGee, Chief, Health Counseling and Rehabilitation Branch, Division of Medical Services
- 2.2 L. O. Holliman, Chief, Personnel Staff, Office of Nuclear Power
- 2.3 Cal Bailey, Employee Assistance Program, Coordinator, Division of Medical Services
- 2.4 Michael R. Tuosto (phone interview), General Manager, Personnel and Equal Opportunity, Public Service and Gas Company
- 2.5 Richard Gutekurst (phone interview), Staff Attorney, TVA, Office of General Counsel
- 2.6 Charles Kline, Personnel Officer, WBN Construction, Office of Employee Relations

