Nuclear Operating Company

South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

May 30, 2019
NOC-AE-19003657
10 CFR 26.719(c)

Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Report of Unsatisfactory Blind Testing Results in Fitness for Duty Program

In accordance with 10 CFR 26.719 (c)(1), STP Nuclear Operating Company (STPNOC) is reporting unsatisfactory blind performance testing results from a Department of Health and Human Services (HHS) certified lab for the STPNOC Fitness for Duty (FFD) Program. STPNOC completed an investigation of a testing error at the HHS-certified laboratory on April 19, 2018. A report of the investigation is attached.

This letter contains no regulatory commitments.

If you have any questions, please contact N. Boehmisch at (361) 972-8172.

5/30/19

Jay Bodnar
Manager, Security

Attachment: Unsatisfactory Blind Testing Results Investigation Report

STI: 34851352

cc:

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Unsatisfactory Blind Testing Results Investigation Report

PROBLEM DESCRIPTION:

On March 3, 2018, the Fitness for Duty (FFD) Coordinator received results from the FFD Backup Testing Laboratory (Alere Toxicology) that reported an "invalid" test result on a blind specimen #505856617 that was a "dilute".

EVENT SIGNIFICANCE:

This event had no impact to nuclear or radiological safety, however, this event is considered significant from a fitness for duty perspective in that the purpose of the blind testing program is to challenge the HHS-certified laboratory's ability to determine specimen validity. Blind samples are submitted each quarter that are appropriately adulterated, diluted, or substituted and in accordance with specifications outlined in 10 CFR Part 26, Section 26.168, and Blind Performance Testing.

INVESTIGATION:

The FFD Coordinator was unable to send the blind specimens until three (3) weeks after receipt of shipping due to outage processing impacts. It is believed that the untimely delay in shipping the specimens for testing to Alere Toxicology Lab resulted in the invalid test results. The packaging of the dilute specimens contained specific instructions for Dilute Blind quality control Specimens that is listed below:

> Due to the fact that creatinine naturally degrades with minor changes in the urine pH over time, it is recommended that dilute specimens be submitted to the laboratory for testing within a short time after receipt so that you will get the proper result as dilute and not as invalid.

Alere Toxicology Lab was asked to send the same aliquot to the Primary testing laboratory, Quest Diagnostics for testing. Quest Diagnostics received the same results on the specimen; invalid results. In addition, three (3) more blind specimens were sent to the Alere Toxicology Lab and one specimen was sent 2 weeks later and all blind specimens came back as dilutes.

EVENT CAUSE:

Although the cause is not positively determinate, it is strongly believed that the initial blind specimen #505856617 was held too long before shipping and was not shipped in accordance with recommended label specifications and it altered the sample.

CORRECTIVE ACTIONS:

- Briefed the FFD Coordinators on this issue and stressed the importance in shipping the blind specimens in a timely manner and specifically, to follow the instructions on the label.
- Revised the FFD Instruction to specify a time for shipping dilute specimens and to put a caution in the procedure regarding all blind specimens.