

The Light company

Houston Lighting & Power

P.O. Box 1700 Houston, Texas 77251 (713) 228-9211

January 3, 1990
ST-HL-AE-3332
File No.: G25/S09

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

South Texas Project Electric Generating Station
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Certification of Fitness-for-Duty Program Compliance

This letter is submitted in accordance with the requirements of 10CFR26.73(d) to certify that the South Texas Project Electric Generating Station (STPEGS) has implemented a fitness-for-duty program that meets the requirements of 10CFR26. Houston Lighting & Power Company (HL&P) has implemented cut off levels more stringent than those imposed by NRC. A comparison of the cut off levels in use at STPEGS to those imposed by NRC is attached. This attachment is identical to that submitted to the NRC by HL&P on November 8, 1989, in accordance with 10CFR26 Appendix A Section 1.1(2).

The HL&P program currently in place provides for a review of positive preliminary tests by the medical review officer (MRO). The MRO would interview the individual and if he believed that the individual is impaired, fitness for duty is questionable or there is a threat to the safety of the plant, the individual, site personnel or the public, access to the plant would be suspended with pay until receipt of the confirmation test results. Review of this program element indicates that this process is not in full compliance with Part 26.24. Therefore, we have instructed the MRO not to take action based on preliminary tests and will revise our implementing procedure by January 16, 1990 to eliminate this feature.

If you have any questions, please contact Mr M A McBurnett at (512)972-8530 or myself at (713)228-7253.



D. P. Hall
Group Vice President,
Nuclear

DPH/MAM/jks

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A Subsidiary of Houston Industries Incorporated

L3/3332/NRC

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ATTACHMENT

Comparison of Drug Panel/Cut-Off Levels

<u>Substance</u>	<u>10CFR26 App. A Cut-Off Levels</u>		<u>STPEGS Cut-Off Levels</u>	
	<u>Preliminary</u>	<u>Confirmation</u>	<u>Preliminary</u>	<u>Confirmation</u>
Propoxyphene	-	-	300 ng/ml	300 ng/ml
Methyqualone	-	-	300 ng/ml	300 ng/ml
Amphetamines	1,000 ng/ml	500 ng/ml ⁽¹⁾ 500 ng/ml ⁽²⁾	300 ng/ml	300 ng/ml
Opiates	300 ng/ml	300 ng/ml ⁽³⁾ 300 ng/ml ⁽⁴⁾	300 ng/ml	200 ng/ml
Barbiturate	-	-	300 ng/ml	200 ng/ml
Cocaine	300 ng/ml	150 ng/ml	300 ng/ml	150 ng/ml
Phencyclidine	25 ng/ml	25 ng/ml	25 ng/ml	25 ng/ml
Cannabinoid	100 ng/ml	15 ng/ml	50 ng/ml	10 ng/ml
Benzodiazepines	-	-	300 ng/ml	100 ng/ml
Alcohol	.04% BAC	.04% BAC	.04% BAC	.04% BAC

(1) Amphetamine

(2) Methamphetamine

(3) Morphine

(4) Codeine

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter)	
)	
Houston Lighting & Power)	Docket Nos. 50-498
Company, et al.,)	50-499
)	
South Texas Project)	
Units 1 and 2)	

AFFIDAVIT

D. P. Hall being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of Houston Lighting & Power Company; that he is duly authorized to sign and file with the Nuclear Regulatory Commission the attached certification of the South Texas Project Electric Generating Station fitness-for-duty program; is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge and belief.

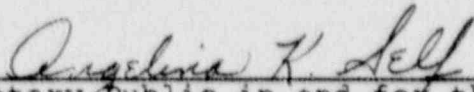


D. P. Hall
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF MATAGORDA)

Subscribed and sworn to before me, a Notary Public in and for Matagorda County, Texas this 3rd day of JANUARY, 1990




Notary Public in and for the
State of Texas