

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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DAVID R. HELWIG
VICE PRESIDENT
NUCLEAR SERVICES

January 3, 1990

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
10 CFR 26 - Fitness for Duty Programs

Dear Sir:

The final rule, "Fitness-for-Duty-Programs," 10CFR26, was issued in the Federal Register on June 7, 1989 (54FR24468). This rule became effective on July 7, 1989 and, in accordance with 10CFR26.2(c), is required to be implemented no later than January 3, 1990. Furthermore, 10CFR26.73(d) requires that each licensee shall certify to the NRC that it has implemented a fitness-for-duty program that meets the requirements of 10CFR26, and that the certification shall describe any licensee chemical testing cut-off levels more stringent than those imposed by 10CFR26.

To the best of my knowledge, we have implemented a fitness for duty program that meets the requirements of 10CFR26 with one exception. 10CFR26, Appendix A, Subpart B, section 2.3 requires in part that appropriate background checks shall be completed for individuals prior to assigning them any tasks associated with the administration of the fitness-for-duty program. We have not yet completed the background check for some of the program administrators, but expect to have these background checks completed by January 5, 1990.

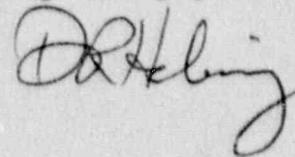
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In addition, in order to certify that we have implemented a fitness-for-duty program at the Philadelphia Electric Company (PECO) which meets the requirements of 10CFR26, we are performing a confirmatory review of our program. This confirmatory review will be completed by the end of January, 1990. Accordingly, I will certify by January 31, 1990, that PECO has implemented a fitness-for-duty program that meets the requirements of 10CFR26.

With respect to chemical testing cut-off levels, we have included chemical testing for barbituates and benzodiazepines, with a cut-off level of 300 ng/ml for both, in addition to testing for substances at the cut-off levels specified by 10CFR26.

Very truly yours,



cc: W. T. Russell, Administrator, Region 1, USNRC
J. J. Lyash, USNRC Senior Resident Inspector, PBAPS
T. J. Kenny, USNRC Senior Resident Inspector, LGS