



A Centene Energy Company

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Docket Number 50-346

License Number NPF-3

Serial Number 1755

January 3, 1990

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

Subject: Certification of Compliance with Fitness-for-Duty Rule
(10CFR26)

Gentlemen:

On June 7, 1989 the NRC published the "Fitness-for-Duty Program" (10CFR26) in the Federal Register. Each Licensee is required to certify to the Nuclear Regulatory Commission (NRC) that it has implemented a Fitness-for-Duty Program pursuant to 10CFR26.73(d). This letter hereby certifies that Toledo Edison has implemented a Fitness-for-Duty Program on January 3, 1990 in accordance with 10CFR26 for Davis-Besse Nuclear Power Station.

This certification also includes cut-off levels that are more stringent than those imposed by 10CFR26. Listed below are the more stringent cut-off levels implemented by Toledo Edison which were submitted to the NRC on November 6, 1989 (Serial Number 1734):

- 1) 10CFR26, Appendix A, Section 2.4 (g) (14) currently states: "If the temperature of the urine specimen is outside the range of 32.5 degrees C - 37.7 degrees C/90.5 degrees F - 99.8 degrees F...."

Toledo Edison has implemented a the temperature range of 34.4 degrees C - 37 degrees C /94 degrees F - 98.6 degrees F.

- 2) 10CFR26, Appendix A, Section 2.7 (e)(1) states that the initial test for cut-off level for marijuana metabolites is 100 ng/ml. Toledo Edison is testing at 50 ng/ml. A second test with a cutoff level of 100 ng/ml will be performed for positive test results at the 50 ng/ml level.

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Additionally, Toledo Edison identified the following two items within 10CFR26, Appendix A that deviate from NIDA certification:

- 1) 10CFR26, Appendix A, Section 2.7 (f)(3) currently states:
"The analytic procedure for confirmatory analysis of blood specimens voluntarily provided by individuals testing positive for alcohol on a breath test shall be gas chromatography analysis."

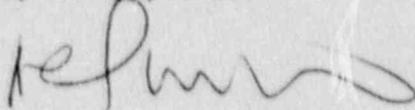
NIDA certification does not require a gas chromatography analysis for blood alcohol content, however, a test will be added to allow Toledo Edison to meet 10CFR26 Appendix A guidelines.

- 2) 10CFR26, Appendix A, Section 2.7 (f)(5) currently states:
"Confirmatory tests for opiates shall include a test for 6-monoacetylmorphine (MAM) if the screening test is presumptive positive for morphine."

Toledo Edison plans to add a test for 6-monoacetylmorphine in the confirmatory test for opiate.

If you have any questions concerning this matter, please contact Mr. R. W. Schrauder, Nuclear Licensing Manager, at (419) 249-2366.

Very truly yours,



GAB/jjd

cc: P. M. Iyron, DB-1 NRC Senior Resident Inspector
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