

P.O. BOX 270 HARTFORD, CONNECTICUT 06141-0270 (203) 665-5000

August 17, 1990

Docket Nos. 50-213

50-245 50-336

50-423 B13606

Re: 10CFR26.71(d)

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

Gentlemen:

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Semiannual Fitness-for-Duty Performance Data

In a letter dated December 18, 1989, (1) Connecticut Yankee Atomic Power Company (CYAPCO), on behalf of the Haddam Neck Plant, and Northeast Nuclear Energy Company (NNECO), on beh\_lf of Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, certified that a fitness-for-duty program had been implemented at both of the aforementioned facilities that met the requirements of 10CFR26 as they were currently understood.

10CFR26.71(d) requires licensees to collect and compile fitness-for-duty program performance data on a standard form and submit this data to the Commission within 60 days of the end of each 6-month reporting period (January-June and July-December). The regulations allow flexibility in how to submit this data; i.e., corporate and other support staff locations may be separately consolidated, but shall include: random testing rate; drugs tested for and cutoff levels, including results of tests using lower cutoff levels and tests for other drugs; work force populations tested; numbers of tests and results by population and type of test (i.e., prebadging, random, for cause, etc); and substances identified. Attachment 1 to this letter contains an explanation of the performance data form, a summary of the performance data, a summary of management actions, and significant events reported. Attachments 2, 3, and 4 are separate compilations of data collected at the Millstone Nuclear Power Station, Haddam Neck Plant, and Northeast Utilities corporate offices, respectively. Attachment 5 is a compilation of the aforementioned

<sup>(1)</sup> E. J. Mroczka letter to U.S. Nuclear Regulatory Commission, "Haddam Neck Plant, Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3, Fitness-for-Duty Program Implementation," dated December 18, 1989.

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sites into one data sheet. With this being the first submittal of this information, it was believed useful to submit separate and total data sheets to the NRC Staff to aid in their data collection and analysis process.

CYAPCO and NNECO trust that the information provided herein addresses the requirements of the fitness-for-duty rule, 10CFR26.71(d). If the Staff has any questions regarding this submittal, please contact us.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY NORTHEAST NUCLEAR ENERGY COMPANY

FOR: E. J. Mroczka

Senior Vice President

BY:

C. F. Sear Vice Presi ent

#### Attachments

cc: T. T. Martin, Region I Administrator

M. L. Boyle, NRC Project Manager, Millstone Unit No. 1 G. S. Vissing, NRC Project Manager, Millstone Unit No. 2 D. H. Jaffe, NRC Project Manager, Millstone Unit No. 3

A. B. Wang, NRC Project Manager, Haddam Neck Plant

W. J. Raymond, Senior Resident Inspector, Millstone Unit Nos. 1, 2, and 3

J. T. Shedlosky, Senior Resident Inspector, Haddam Neck Plant

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#### Attachment No. 1

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Northeast Utilities Service Company

Performance Data Form Explanation Summary of Performance Data/Management Actions Significant Events Reported U.S. Nuclear Regulatory Commission B13606/Attachment 1/Page 1 August 17, 1990

Haddam Neck Plant

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Northeast Utilities Service Company

Performance Data Form Explanation

Summary of Performance Data/Management Actions

Significant Events Reported

### Performance Data Form Explanation

#### o <u>Cutoffs</u>

Northeast Utilities cutoff levels differ from NRC standard cutoff levels in the marijuana category only. Northeast Utilities uses a 50 mg/ml screening cutoff level.

### o Substances

Northeast Utilities tests for five additional drugs--listed on the front of the form.

### o <u>Categories</u>

- The "preemployment" testing category included those persons seeking a job with Northeast Utilities in a position which requires unescorted access. The category includes outside applications as well as internal transfers.
- The "prebadging" category includes all contract personnel seeking access to a Northeast Utilities nuclear facility as well as currently employed Northeast Utilities personnel requesting unescorted access.

## o NRC vs. Northeast Utilities Cutoff Levels

Since Northeast Utilities uses a cutoff level for marijuana which is more restrictive than NRC, the "# positive" column is split; the left side indicates confirmed positives based on NRC cutoff levels, and the right side indicates the confirmed positives based on Northeast Utilities' more restrictive cutoff levels.

# o Average Number With Unescorted Access vs. Random Testing Results

The average number of employees with unescorted access for the corporate office (see Attachment 4) includes employees from a variety of support locations; some at the corporate office, others at, or near, the two plant sites.

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The data reported in the random test results category reflects the number of tests actually performed at each of NU's collection locations.

Although random selection of these corporate support personnel is performed in conjunction with the corporat office pool, specimen collection is actually done at the collection site nearest the individual's work location or current assignment--frequently at one of the stations.

As a result, the number tested in the random category for the corporate office appears less than anticipated, while the number tested in the same category for Millstone and Haddam Neck is higher than expected. However, the aggregate data for total program performance (Attachment 5) demonstrates that the number of random tests performed meets the required level.

o Confirmed Positive Test for Specific Substances

This section contains the number of confirmed positive tests, recorded by substance, during the reporting period. Please note that there is no direct correlation between the sum of these numbers and the number of positives entered in the section above; multiple positive tests per individual are recorded as separate items in this table.

## Summary of Performance Data

- o 3,121 tests performed.
- o 1,794 tests were random.
  - -- Average population = 3,505.
  - -- 100 percent target rate achieved.
- o Percent positive rates:
  - -- Preemployment and Prebadging = 1.53 percent (61 percent of positive tests were in these two categories).
  - -- Random = 0.33 percent
  - -- Overall = 0.96 percent.
- o There were 33 confirmed positive tests from 30 individuals.

#### Breakdown:

-- Marijuana 17 (52 percent) -- Cocaine 12 (36 percent) -- Alcohol 4 (12 percent) U.S. Nuclear Regulatory Commission B13606/Attachment 1/Page 3 August 17, 1990

There were no confirmed tests for any other substance.

- o NRC vs. Northeast Utilities Cutoff Levels
  - -- A total of 17 individuals tested positive for marijuana.
  - Twelve of these seventeen samples screened at a level between 50 ng/ml and 99 ng/ml (71 percent of the samples tested positive for marijuana at a level less than 100 ng/ml).
  - -- Five of the seventeen samples screened at a level of 100 ng/ml or greater (that is 29 percent of the samples tested positive for marijuana at a level of 100 ng/ml or greater).
  - Three of the twelve individuals who tested positive between 50 and 99 ng/ml also tested positive for another substance which has a cutoff level identical to NRC. Consequently, Northeast Utilities' lower cutoff level had no impact on the positive determination for these three individuals, and the total difference between NRC and Northeast Utilities results is nine.

### Management Actions

Twenty-four contractor personnel tested positive. Eighteen of these individuals tested positive in the prebadging situation. All 18 were denied unescorted access and will not be considered for unescorted access for a period of 1 year. Another 6 contractor personnel, with unescorted access, tested positive and unescorted access privileges were revoked. These individuals are similarly not eligible for consideration for unescorted access for 1 year.

One outside applicant for employment with Northeast Utilities tested positive in a preemployment test. Employment was denied and the person may not reapply for one year.

Four Northeast Utilities employees tested positive. Consistent with Company policy, the following actions were taken:

- o Unescorted access revoked for a minimum of 14 days.
- o Referred to the Employee Assistance Program (EAP).
- o Placed on paid medical leave for a minimum of 14 days (paid status contingent upon cooperation with the medical program).

One of the above employees subsequently tested positive a second time, prior to reinstatement, and was terminated.

Two employees have had their unescorted access reinstated. Reinstatement of a third is pending at the time of this report.

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## Significant Event

On April 19, 1990, a supervisor working for a contract security firm tested positive for alcohol in a for-cause situation. Consistent with procedure, he was removed from the site, and unescorted access privileges were revoked for one year.

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Attachment No. 2

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Semiannual Fitness-for-Duty
Performance Data

Northeast Nuclear Energy Co.

# Performance Data Personnel Subject to CFR 26

Waterford, CT						6 MONT	HS ENDIN	G		
David J. Herit	age					-	-	5 - 8036 AREA CODE)		
CUTOFFS: SCREEN/C	ONFIRMATIC	ON (ng/ml)	APPENI		FR 26					
MARUU. NA 50	/ 15	AMPHETAM	IINES 10	00 / 500	Bar	bitur	ates	300	/ 300	,
COCAINE 300	)/ 50	PHENCYCLI	IDINE	25 / 25			zenir		300	
OPIATES 300	)/ 300	ALCOHOL (	% BAC)	0.04		haqua	lone	300/	300	)
TESTING RESULTS		LICENSEE	EMPLOYEES		CONT	RACTO	OR L	TOTA	AL	
AVERAGE NUMBER WITH UNESCORTED ACCESS	752	N R N C U		STATE OF THE PARTY	891	N R C	N U	1643	N P	N U
CATEGORIES	TESTED	POSITIVE	REFERRED TO EAP	ACCESS RESTORED	# TESTED		# SITIVE	TESTED	PO	# SITIVE
PRE-EMPLOYMENT	18	0 -		one re-	0	(	)	18		0
PRE-BADGING	14	0		-	845	9	10	859	9	10
PERIODIC	0	0	A	February English	0	(	)	0		0
FOR CAUSE	0	0	<b>全线</b>	10000	4	3	3	4	3	3
POST ACCIDENT	0	0	大土地	1.2.	0	(	)	0		0
RANDOM	607	1 1		きる。	435	1	1	1042	2	2
FOLLOW-UP	3	0	A TOTAL	百季年	0		)	3		0
OTHER	0	0	6		2	(	)	2		0
TOTAL	(10				1006	10	1,	1020	1,,	1,5

1286

June 30, 1990

INDIVIDUALS TESTED			1	98	39				19	990	)					199	91					1	99	2	and the			19	93		
* POSITIVE	TIVE	/	/		/	/	,	2/10	40		/	/	1	/	/		/	/	/	/	/	/	1	/	/	/	/	/	/	/	/
% POSITIVE							0	. 1	9																						
GRAPH OF % POSITIVE	5 - 4 - 3 - 2 - 1 -																														

# CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES

MARIJUANA	6				
COCAINE	6				
OPIATES	0				
AMPHETAMINES	0				
PHENCYCLIDINE	0				
ALCOHOL	4				
TOTAL	16				

Attachment No. 3

Haddam Neck Plant

Semiannual Fitness-for-Duty
Performance Data

# Performance Data Personnel Subject to CFR 26

Haddam Ne	ck, CT				6 MONTHS ENDING	
LOCATION						
David J. 1	Heritage				(203) 721-230	)6
CONTACT NAME					PHONE (INCLUDE AREA	
CUTOFFS: SCR	EEN/CONFIRMAT	TION (ng/ml) API		TO 100FF		
			PENDIX A	TO 100FF	R 26 Barbiturates	300/ 300 300/ 300
MARIJUANA	SEEN/CONFIRMAT	AMPHETAMINES		TO 100FF	26	300/ 300 300/ 300
CUTOFFS: SCR MARIJUANA COCAINE			PENDIX A	500	Barbiturates Benzodiazonines Methadone	300/ 300

TESTING RESULTS		LICE	NSEE	EMPLOYEES		CONT	RACTO		TO	TAL	
AVERAGE NUMBER WITH UNESCORTED ACCESS	193	N P. C	N U			534	N P C	N U	727	N P. C	N U
CATEGORIES	# TESTED	PO	# SITIVE	REFERRED TO EAP	ACCESS RESTORED	# TESTED	POS	# SITIVE	# TESTED	PO	# SITIVE
PRE-EMPLOYMENT	9		0		the man	0		0	9		n
PRE-BADGING	8	1	1		April 19 Company	332	2	8	340	3	9
PERIODIC	С		0		-	c		0	0		0
FOR CAUSE	0		0	全数金		1	1	0	1		0
POST ACCIDENT	0		0		2.4	0		0	0		0
RANDOM	191		0		を発生	270	2	2	461	2	2
FOLLOW-UP	1	1	1	1	10 AL	0	(		1	1	1
OTHER	0		)		157-4	0	(	)	0		0
TOTAL	209	2	2	1	0	603	4	10	812	6	12

INDIVIDUALS TESTED				19	89					19	90					1	991						19	92					1	99	3	
* POSITIVE	IVE	_	/	7	/	/	/	/	45	29	_	/	/	1	/	/	1	/	/	1	/	/		/	/	/	1	/	/	+	/	/
% POSITIVE								0	.43	3				1			1		_		-	Т	_	_	ТТ	T	4	_	Т	+	П	П
GRAPH OF SPOSITIVE	5 - 4 - 3 - 2 - 1 -																															

CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES

ANAUUP	9		
ON 1E	5		
OPIATES	0		
AMPHETAMINES	0		
PHENCYCLIDINE	0		
ALCOHOL	0		
TOTAL	14		

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Attachment No. 4

Northeast Utilities Service Company

Semiannual Fitness-for-Duty
Performance Data

# Performance Data Personnel Subject to CFR 26

Corporate	e Office			The same	June 30, 1990		
COMPANY					6 MONTHS ENDING		
Berlin, (	CT						
LOCATION							
David J.	Heritage				(203) 721-2306		
CONTACT NAME					PHONE (INCLUDE AREA CO	DE)	
CUTOFFS: SC	REEN/CONFIRM	ATION (ng/ml) AP	PENDIX A TO 10CF	R 26			
MARIJUANA	50/15	AMPHETAMINES	1000/500		Barbiturates	300/300	
					Benzodiazepines	300/300	
COCAINE	300/50	PHENCYCLIDINE	25/25		Methadone	300/300	
					Methaqualone	300/300	
OPIATES	300/300	ALCOHOL (% BAC)	0.04		Propoxyphine	300/300	

TESTING RESULTS		LICE	NSEE I	EMPLOYEES		CONTE	RACTO ONNEL	R	TO	TAL	
AVERAGE NUMBER WITH UNESCORTED ACCESS	1135	N R	N		7		N R	N	1135	N R	N
CATEGORIES	# TESTED	PO	# SITIVE	# REFERRED TO EAP	# ACCESS RESTORED	# TESTED	POS	# ITIVE	# TESTED	POS	# SITIVE
PRE-EMPLOYMENT	40	0	1	6 次					40	0	1
PRE-BADGING	39	(	)		100	7			39	0	
PERIODIC	0	(	)						0	0	
FOR CAUSE	0	(	)	May .					0	0	
POST ACCIDENT	0	(	)						0	0	
RANDOM	291	1	2	Mary Mary	a street				291	1	2
FOLLOW-UP	11	(	)	144 Y	***				11	0	
OTHER	0	(	)						0	0	
TOTAL	381	1	3	2	1				381	1	3

INDIVIDUALS TESTED			19	989	)				19	990	)				19	991					1	99	2				199	93		-
# POSITIVE	TIVE	/	/		/	/	/	2/2	89	1	/	7	/	/	/	1	/	/	1	/	/	1	/	/	/	/		_	/	_
% POSITIVE								0.	68							1			1	_										_
GRAPH OF % POSITIVE	5 4 3 2 1																													

CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES

MARIJUANA	2				
COCAINE	1				
OPIATES					
AMPHETAMINES					
PHENCYCLIDINE					
ALCOHOL					
TOTAL	3				

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tachment No. 5

Haddam Neck Plant
Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Northeast Utilities Service Company

Semiannual Fitness-for-Duty Performance Data

# Performance Data Personnel Subject to CFR 26

Northeast Utilities	June 30, 1990
COMPANY	6 MONTHS ENDING
Berlin, CT LOCATION	
David J. Heritage	(203) 721-2306 PHONE (INCLUDE AREA CODE)
CONTACT NAME	

CUTOFFS: SCREEN/CONFIRMATION (ng/mi) APPENDIX A TO 10CFR 26

50/15 1000/500 MARIJUANA **AMPHETAMINES** 300/300 Barbiturates 300/300 Benzodiazepines 300/300 COCAINE 300/50 PHENCYCLIDINE 25/25 Methadone Methaqualone 300/300 300/300 Propozyphine 300/300 ALCOHOL (% BAC) 0.04 **OPIATES** 

TESTING RESULTS		LICE	NSEE I	EMPLOYEES		CONTR	TERM RACTO ONNEL	R	TOTAL				
AVERAGE NUMBER WITH UNESCORTED ACCESS	2080	N R C	N U		WINTERS	1425	N R C	N U	3505	N R C	N U		
CATEC ORIES	# # POSITIVE			REFERRED TO EAP	# ACCESS RESTORED	# TESTED		# ITIVE	# TESTED	# POSITIVE			
PPG-EMPLOYMENT	67	0	i			0		)	67	0	1		
PRE-BADGING	61	1	1	pr residence summe		1177	11	18	1238	12	19		
PERIODIC	0		0		See Arrest	0	1	0	0		0		
FOR CAUSE	0		0			5	3	3	5	3	3		
POST ACCIDENT	0	0				0		0	0		0		
RANDOM	1089	2	3			705	3	3	1794	5	6		
FOLLOW-UP	15	1	1	era man	10. March	n		0	15	1	1		
OTHER	0	0 0		THE PARTY OF	HTW AL	2		0	2	0			
TOTAL	1232	4	6	4	2	1889	17	24	3121	21	30		

INDIVIDUALS TESTED	1989					1990					1991							1992						1993									
# POSITIVE # NEGA	TIVE	/	/		/	/	7	/	6/1	785		/	/		_	/	/	/	/	/	1	/	/		_	/	/	1	/	/	1	/	/
% POSITIVE									0.	33																							
GRAPH OF % POSITIVE	5 - 4 - 3 - 2 - 1 -																																

CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES

MARIJUANA	17					
COCAINE	12					
OPIATES	0					
AMPHETAMINES	0					
PHENCYCLIDINE	0					
ALCOHOL	4					
Barbiturates	0					
nzodiazepines	0					
Methadone	0			-		
Methaqualone	0					6/7/89
Propoxyphine	0					
TOTAL	33		-		Teauren.	