

10CFR26.71(d)



PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

February 25, 1994

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
Fitness-for-Duty Program Performance Data for
the Period July 1993 through December 1993

Gentlemen:

As required by 10 CFR 26.71(d), this letter submits the performance data for our Fitness-for-Duty program for the period July 1993 through December 1993. The data for our Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2, sites are provided in Attachments 1 and 2. Data for our Corporate Office and Nuclear Group Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA and 955-65 Chesterbrook Boulevard, Wayne, PA respectively) are also provided in Attachment 3.

The data are reported on the January 1992 revision of the Fitness-for-Duty (FFD) Performance Data form provided by the Nuclear Management and Resources Council (NUMARC), and include the following.

05/10/94
9403090274 940225
PDR ADOCK 05000277
R PDR

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- Drugs tested for and cut-off levels.
- Workforce population tested.
- Numbers of tests and results by population and type of test (i.e, pre-access, for-cause, random, follow-up, and other types of tests.)
- Substances identified.

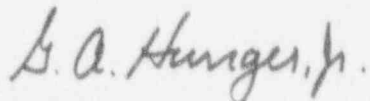
Attachments 1, 2, and 3 also include the following.

- Summary of management actions.
- Analysis of the data and appropriate actions that have been taken.
- Random testing rate.

Note that there were no events that were reportable in accordance with 10CFR26.73 during this period.

If you have any questions or require additional information, please contact us.

Very truly yours,



G. A. Hunger, Jr., Director
Licensing Section

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC w/attachments
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS w/attahcments
N. S. Perry, USNRC Senior Resident Inspector, LGS w/attachments

ATTACHMENT 1

Summary of Data Analysis and Management Action Peach Bottom Atomic Power Station July - December 1993

I. Initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug-sniffing canine teams during this period at Peach Bottom Atomic Power Station (PBAPS).

- A. July 28, 1993 - General team sweep of outer screen structure, Welding Shop and contractor trailer. Results: One activation. No drugs found or forensic samples taken.
- B. July 29, 1993 - For cause team sweep of employee's private vehicle following positive June 25, 1993, test result. Results: Three activations. Drug paraphernalia confiscated. Employee admitted the paraphernalia was used in association with cocaine. Employee's access denied and referred to Medical. Unescorted access reinstated August 24, 1993.
- C. August 13, 1993 - General team sweep of Bartlett Nuclear, Inc. trailers. Results: Sixteen activations. No drugs found or forensic samples taken.
- D. August 13, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- E. August 31, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: No activations.
- F. September 14, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Investigation verified that the contractor failed to report a previous positive drug test. Contractor's plant access denied.
- G. September 14, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: No activations. Contractor's plant access denied based upon unsatisfactory psychological screening.
- H. September 20, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Three activations. One forensic sample obtained from a mirror. Laboratory analysis verified the presence of impure cocaine. Contractor tested negative. Contractor's plant access denied.
- I. September 20, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Three activations. Security confiscated a leather pouch, razor blade and straw for laboratory analysis. The presence of impure cocaine was detected on both the razor blade and straw. Contractor tested positive. Contractor's plant access denied.
- J. September 20, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Investigation verified previous drug dealing and addiction. Contractor was already subject to accelerated testing. Contractor tested negative.

- K. September 21, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Three activations. No drugs found or forensic samples taken. Contractor tested negative.
- L. September 21, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Contractor tested negative.
- M. September 21, 1993 - For cause team sweep of contractor employee's personal belongings. Results: One activation. No drugs found or forensic samples taken. Contractor admitted association with drug users. Contractor tested negative.
- N. September 22, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Three activations. No drugs found or forensic samples taken. Contractor tested negative.
- O. September 24, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- P. November 23, 1993 - General team sweep of UE&C Nuclear, Inc. trailers. Results: Eight activations. No drugs found or forensic samples taken.
- Q. December 17, 1993 - General team sweep of Facilities Management Workshop and Contract Painter's Workshop. Results: Nine activations. No drugs found or forensic samples taken.
- R. December 29, 1993 - For cause team sweep of an employee's private vehicle. Results: Three activations. No drugs found or forensic samples taken. Employee recommended for termination due to misconduct.

II. Management Actions

During the period, three PECO Energy employees tested positive at PBAPS. Two employees tested positive on random tests. Both employees were provided treatment/rehabilitation through PECO Energy's Employee Assistance Program (EAP). Unescorted access has been reinstated for one of the employees. The other employee was recommended for termination. The third employee tested positive as a result of a for-cause test that was ordered based on information that the employee may have been under the influence of alcohol. The employee resigned.

During the period, six contractor employees (i.e., five pre-access and one for-cause/observed behavior) tested positive at PBAPS. Unescorted access was denied for those contractor employees in accordance with PECO Energy's Fitness-For-Duty (FFD) Specification for Contractors.

III. Events Reported Under 10 CFR 26.73

There were no 10 CFR 26.73 reportable events during the period.

IV. Nuclear Quality Assurance Audit

During the period, a performance based audit of the FFD program was completed to assess the program's implementation.

The audit found the FFD program to be effectively managed and implemented. The report cited significant strengths in the site collection and screening practices and procedures, the EAP, and practices at the HHS-Laboratory. The report also noted that effective management and adequate staffing are in place to assure that the program continues to function effectively.

The report noted three deficiencies:

- A. Procedural discrepancies in the performance of alcohol breath testing device daily accuracy checks.
- B. Procedural discrepancies regarding the HHS-Laboratory 6-monoacetylmorphine testing.
- C. Two employees were found to be overdue for FFD Supervisory requalification training.

These issues were immediately addressed and resolved.

V. Random Testing Rate

PECO Energy conducts random testing at an annualized rate of 100%. PECO Energy maintains separate testing "pools" for employees and contractors. The "average number with unescorted access" includes personnel badged at PBAPS, and/or LGS.

Fitness for Duty Program
Performance Data
Personnel Subject to 10CFR 26

PECO Energy Company	12/31/93
Company	6 Months Ending
Peach Bottom Atomic Power Station	
Location	
David M. Sarley	(215) 841-5703
Contact Name	Phone (include area code)
Cutoffs: Screen Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana 100 / 15	Amphetamines 1000 / 500 _____ /
Cocaine 300 / 150	Phencyclidine 25 / 25 _____ /
Opiates 300 / 300	Alcohol (% BAC) 0.04 % _____ /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		2751*				1713*	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		1	0			741	5
For Cause	Post accident	6	0			1	0
	Observed behavior	8	1			12	1
Random		613	2			419	0
Follow-up		66	0			37	0
Other		5	0			6	0
Total		699	3			1216	6

* Includes individuals with dual-site access at PBAPS & LGS.

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5
Licensee Employees	1					1						
Long-Term Contractors												
Short-Term Contractors	4	3										
Total	5	3				1						
												9

A

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- I. September 20, 1993 - For cause team sweep of a contractor employee's private vehicle. Results: Three activations. Security confiscated a leather pouch, razor blade and straw for laboratory analysis. The presence of impure cocaine was detected on both the razor blade and straw. Contractor tested positive. Contractor's plant access denied.
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During the period, six contractor employees (i.e., five pre-access and one for-cause/observed behavior) tested positive at PBAPS. Unescorted access was denied for those contractor employees in accordance with PECO Energy's Fitness-For-Duty (FFD) Specification for Contractors.

III. Events Reported Under 10 CFR 26.73

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The report noted three deficiencies:

- A. Procedural discrepancies in the performance of alcohol breath testing device daily accuracy checks.
- B. Procedural discrepancies regarding the HHS-Laboratory 6-monoacetylmorphine testing.
- C. Two employees were found to be overdue for FFD Supervisory requalification training.

These issues were immediately addressed and resolved.

V. Random Testing Rate

PECO Energy conducts random testing at an annualized rate of 100%. PECO Energy maintains separate testing "pools" for employees and contractors. The "average number with unescorted access" includes personnel badged at PBAPS, and/or LGS.

ATTACHMENT 2

Summary of Data Analysis and Management Actions Limerick Generating Station July - December 1993

I. Initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug-sniffing canine teams during this period at Limerick Generating Station (LGS).

- A. July 29, 1993 - General team sweep of the Personnel Processing Center. Results: No activations. No drugs found or forensic samples taken.
- B. August 26, 1993 - General team sweep of the 3rd Floor, Administration Building. Results: No activations. No drugs found or forensic samples taken.
- C. September 27, 1993 - General team sweep of John S. Kemper Building, 4th Floor. No activations. No drugs found or forensic samples taken.
- D. October 28, 1993 - General team sweep of the 2nd Floor, Site Services Building, and the Construction area of the Technical Support Center. Results: No activations. No drugs found or forensic samples taken.
- E. November 24, 1993 - General team sweep of the Technical Support Center. Results: No activations. No drugs found or forensic samples taken.
- F. December 21, 1993 - General team sweep of the Perkiomen Pump House. Results: No activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, one PECO Energy employee tested positive on a random test at LGS. The employee was provided treatment/rehabilitation through PECO Energy's Employee Assistance Program (EAP). The employee's unescorted access was subsequently reinstated.

During the period, eight contractor employees (i.e., five pre-access, two for-cause/observed behavior, and one follow-up) tested positive at LGS. The contractor employee was subject to follow-up testing as a result of concerns identified during pre-access psychological screening. Unescorted access was denied to those contractor employee's in accordance with PECO Energy's FFD Specifications for Contractors.

III. Events Reported Under 10 CFR 26.73

There were no 10 CFR 26.73 reportable events during the period.

IV. Nuclear Quality Assurance Audit

During the period, a performance based audit of the FFD program was completed to assess the program's implementation.

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- C. Two employees were found to be overdue for FFD Supervisory requalification training.

These issues were immediately addressed and resolved.

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PECO Energy conducts random testing at an annualized rate of 100%. PECO Energy maintains separate testing "pools" for employees and contractors. The "average number with unescorted access" includes personnel badged at PBAPS, and/or LGS.

Fitness for Duty Program
Performance Data
Personnel Subject to 10CFR 26

PECO Energy Company	12/31/93
Company	6 Months Ending
Limerick Generating Station	
Location	
David M. Sarley	(215) 841-5703
Contact Name	Phone (include area code)
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana 100 / 15	Amphetamines 1000 / 500 _____ /
Cocaine 300 / 150	Phencyclidine 25 / 25 _____ /
Opiates 300 / 300	Alcohol (% BAC) 0.04 % _____ /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		2751*				1713*	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		0	0			353	5
For Cause	Post accident	30	0			15	0
	Observed behavior	1	0			3	2
Random		521	1			265	0
Follow-up		45	0			8	1
Other		3	0			1	0
Total		600	1			645	8

* Includes individuals with dual-site access at PBAPS & LGS.

Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamine	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees		1											
Long-Term Contractors													
Short-Term Contractors	5	2		1		2							A
Total	5	3		1		2							11

ATTACHMENT 2

Summary of Data Analysis and Management Actions Limerick Generating Station July - December 1993

I. Initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug-sniffing canine teams during this period at Limerick Generating Station (LGS).

- A. July 29, 1993 - General team sweep of the Personnel Processing Center. Results: No activations. No drugs found or forensic samples taken.
- B. August 26, 1993 - General team sweep of the 3rd Floor, Administration Building. Results: No activations. No drugs found or forensic samples taken.
- C. September 27, 1993 - General team sweep of John S. Kemper Building, 4th Floor. No activations. No drugs found or forensic samples taken.
- D. October 28, 1993 - General team sweep of the 2nd Floor, Site Services Building, and the Construction area of the Technical Support Center. Results: No activations. No drugs found or forensic samples taken.
- E. November 24, 1993 - General team sweep of the Technical Support Center. Results: No activations. No drugs found or forensic samples taken.
- F. December 21, 1993 - General team sweep of the Perkiomen Pump House. Results: No activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, one PECO Energy employee tested positive on a random test at LGS. The employee was provided treatment/rehabilitation through PECO Energy's Employee Assistance Program (EAP). The employee's unescorted access was subsequently reinstated.

During the period, eight contractor employees (i.e., five pre-access, two for-cause/observed behavior, and one follow-up) tested positive at LGS. The contractor employee was subject to follow-up testing as a result of concerns identified during pre-access psychological screening. Unescorted access was denied to those contractor employee's in accordance with PECO Energy's FFD Specifications for Contractors.

III. Events Reported Under 10 CFR 26.73

There were no 10 CFR 26.73 reportable events during the period.

IV. Nuclear Quality Assurance Audit

During the period, a performance based audit of the FFD program was completed to assess the program's implementation.

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The report noted three deficiencies:

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- B. Procedural discrepancies regarding the HHS-Laboratory 6-monoacetylmorphine testing.
- C. Two employees were found to be overdue for FFD Supervisory requalification training.

These issues were immediately addressed and resolved.

V. Random Testing Rate

PECO Energy conducts random testing at an annualized rate of 100%. PECO Energy maintains separate testing "pools" for employees and contractors. The "average number with unescorted access" includes personnel badged at PBAPS, and/or LGS.

ATTACHMENT 3

Summary of Data Analysis and Management Actions Corporate and Nuclear Group Headquarters July - December 1993

I. Initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug-sniffing canine teams during this period at the Corporate and Nuclear Group Headquarters.

- A. August 10, 1993 - For cause team sweep of employee's private vehicle. Employee had tested positive at PBAPS on 7/5/93. Results: Three activations. No drugs found or forensic samples taken. Employee's unescorted access reinstated on December 17, 1993.
- B. September 10, 1993 - General team sweep of the 965 Building, "C" Wing, 3rd Floor, Construction areas. Results: Three activations. No drugs found or forensic samples taken.
- C. December 13, 1993 - For cause team sweep of employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- D. December 30, 1993 - General team sweep of the 955 Building, 1st Floor, "A" Wing, Nuclear Quality Assurance Section. Results: No activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, one PECO Energy employee tested positive at the Corporate Headquarters as a result of a for-cause/observed behavior test. Unescorted access was denied and the employee was subsequently terminated.

III. Events Reported Under 10 CFR 26.73

There were no 10 CFR 26.73 reportable events during the period.

IV. Nuclear Quality Assurance Audit

During the period, a performance based audit of the FFD program was completed to assess the program's implementation.

The audit found the FFD program to be effectively managed and implemented. The report cited significant strengths in the site collection and screening practices and procedures, the EAP, and practices at the HHS-Laboratory. The report also noted that effective management and adequate staffing are in place to assure that the program continues to function effectively.

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- A. Procedural discrepancies in the performance of alcohol breath testing device daily accuracy checks.
- B. Procedural discrepancies regarding the HHS-Laboratory 6-monoacetylmorphine testing.
- C. Two employees were found to be overdue for FFD Supervisory requalification training.

These issues were immediately addressed and resolved.

V. Random Testing Rate

PECO Energy conducts random testing at an annualized rate of 100%. PECO Energy maintains separate testing "pools" for employees and contractors. The "average number with unescorted access" includes personnel badged at PBAPS, and/or LGS.

Fitness for Duty Program
Performance Data
Personnel Subject to 10CFR 26

PECO Energy Company	7/1/93-12/31/93
Company	6 Month Ending
Corporate and Nuclear Headquarters	
Location	
David M. Sarley	(215) 841-5703
Contact Name	Phone (include area code)
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana 100 / 15	Amphetamines 1000 / 500 _____ /
Cocaine 300 / 150	Phencyclidine 25 / 25 _____ /
Opiates 300 / 300	Alcohol (% BAC) 0.04 % _____ /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access		2751*				1713*	
Pre-Access		3	0			2	0
For Cause	Post accident	4	0			1	0
	Observed behavior	2	1			0	0
Random		212	0			20	0
Follow-up		18	0			0	0
Other		3	0			0	0
Total		242	1			23	0

* Includes individuals with dual-site access at PBAPS & LGS.

ATTACHMENT 3

Summary of Data Analysis and Management Actions Corporate and Nuclear Group Headquarters July - December 1993

I. Initiatives Taken

The following summarizes the results of sweeps conducted by PECO Energy Company's drug-sniffing canine teams during this period at the Corporate and Nuclear Group Headquarters.

- A. August 10, 1993 - For cause team sweep of employee's private vehicle. Employee had tested positive at PBAPS on 7/5/93. Results: Three activations. No drugs found or forensic samples taken. Employee's unescorted access reinstated on December 17, 1993.
- B. September 10, 1993 - General team sweep of the 965 Building, "C" Wing, 3rd Floor, Construction areas. Results: Three activations. No drugs found or forensic samples taken.
- C. December 13, 1993 - For cause team sweep of employee's private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- D. December 30, 1993 - General team sweep of the 955 Building, 1st Floor, "A" Wing, Nuclear Quality Assurance Section. Results: No activations. No drugs found or forensic samples taken.

II. Management Actions

During the period, one PECO Energy employee tested positive at the Corporate Headquarters as a result of a for-cause/observed behavior test. Unescorted access was denied and the employee was subsequently terminated.

III. Events Reported Under 10 CFR 26.73

There were no 10 CFR 26.73 reportable events during the period.

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During the period, a performance based audit of the FFD program was completed to assess the program's implementation.

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