DETAILS

Report No.	50-344/90-30 (IE-V-934)
Docket No.	50-344
License No.	NFP-1
Licensee:	Portland General Electric Company 121 S.W. Salmon Street, TB-17 Portland, Oregon 97204
Facility Name:	Trojan Nuclear Plant
Inspected At:	Prescott, Oregon
Inspection Conducted:	November 13 through November 26, 1990
Type of Inspection:	Initial, Fitness-for-Duty

Inspectors: M D Schuster 12/11/90
M. D. Schuster, Sr. Physical Security Inspector — Date Signed

Robert J Pate for 12/12/90
D. W. Schaefer, Physical Security Inspector — Date Signed

Accompanying Personnel: S. Murphy, Battelle Human Research Center

Approved by: Robert J Pate 12/12/90
Robert. J. Pate, Chief, Nuclear Materials and Fuel Fabrication Branch — Date Signed

Inspection Summary:

Areas Inspected: This initial, announced inspection examined the licensee's Fitness for Duty (FFD) Program implemented in accordance with 10 CFR Part 26. Specifically, the licensee's written policies and procedures, program administration, training, onsite collection facility and key management personnel responsible for the FFD program were reviewed. The inspectors used NRC Temporary Instruction 2515/106, "Fitness for Duty: Initial Inspection of Implemented Program" dated July 11, 1990.

Results: Based upon the NRC's selective examination of the licensee's FFD program, it has been concluded that the licensee is satisfying the general objectives of 10 CFR Part 26. The following program strengths and weaknesses were identified:

Strengths:

1. Licensee management displayed strong support of the program.

2. The licensee's use of a lower cutoff level for marijuana and testing for a larger number of drugs than required by 10 CFR Part 26.

3. Licensee's incorporation and effective use of peer support groups to augment the employee assistance program.

4. Cross training of courier and laboratory technicians.

5. The licensee's strong self assessment program which included Quality Assurance audits and internal reviews.

6. The professionalism and expertise of the licensee's Medical Review Officer, Fitness for Duty Coordinator, Employee Assistance Program Specialist, and Supervising Medical Technologist.

Weaknesses

1. Some Fitness-for-Duty procedures need updating (Inspection Report Details, Paragraph 2).

2. The licensee's random selection process for testing on back shifts and weekends was disproportionate to the overall random selection program and may be perceived by the employees as a "safe haven" period from testing (Inspection Report Details, Paragraph 6.a).

3. The licensee's use of specimen bottles with affixed temperature strips, provide a means for the employee to self-determine the temperature of their specimens and may permit a means of introducing a surrogate urine specimen (Inspection Report Details, Paragraph 6.b).

REPORT DETAILS

1. Key Persons Contacted

Licensee

*A. Ankrum, Manager, Nuclear Security Department, PGE
*A. Barnett, Manager Human Resources, PGE
*S. Bauer, Manager, Nuclear Regulation Branch, PGE
*J. Benjamin, Quality Assurance Audit Supervisor, PGE
P. Clark, Badging Supervisor, Nuclear Security Department, PGE
*J. Cross, Vice President, Nuclear, PGE
*G. Culp, Manager, Personnel Security, Nuclear Security Department, PGE
*J. Dong, System Analyst, Nuclear Security Department, PGE
*D. Fancher, Supervisor Plant Training, PGE
*L. Friedman, PhD, PGE Contract Psychologist
*N. Gause, Computer Programmer, PGE
*K. Griffin, MD, PGE Contract Medical Review Officer
*G. Hicks, General Manager Plant Support, PGE
*M. Hoffmann, Manager, Nuclear Safety and Regulation Department, PGE
*D. Kielblock, Vice President, Human Resources, PGE
*J. Loftin, FFD Clerk, PGE
*J. Nelson, EAP Specialist, PGE
*S. Nichols, Manager, Training Department, PGE
*D. Nordstrom, Quality Assurance Branch Manager, PGE
*C. Seaman, General Manager, Nuclear Quality Assurance Department, PGE
*M. Shaw, Fitness For Duty Coordinator, PGE
*M. Singh, Acting Manager, Technical Functions, PGE
*J. Sinibaldi, Security Inspector, Nuclear Security Department, PGE
*B. Van Meter, Engineering Analyst, Nuclear Security Department, PGE
*T. Westerbeck, Supervising FFD Medical Technologist, PGE
*W. Williams, Regulatory Compliance, Nuclear Safety and Regulation, PGE

US NRC

*R. Barr, Senior Resident Inspector, Trojan Nuclear Plant
*S. Murphy, Battelle Northwest (NRC Contractor)

The above individuals denoted with an asterisk were present during the exit meeting on November 16, 1990. The inspectors also interviewed other licensee and contractor personnel, both supervisor and non-supervisor personnel during the course of this inspection.

2. Licensee's Written Policies and Procedures

On October 13, 1989, the Vice President, Nuclear Division issued a "Fitness-for-Duty Announcement" which described the key components of Trojan's Fitness For Duty (FFD) program. This announcement briefly outlined the subjects of training, random drug testing, medical review officer duties, penalties, confidentiality and reliability in the testing process, and the employee assistance program.

Nuclear Division Procedure (NDP) No. 900-1, "Trojan Fitness For Duty Program", revised March 16, 1990, provides for direction of a program designed to provide reasonable assurance that plant personnel are not under the influence of any substance, legal or illegal, or mentally or physically impaired in any way that adversely affects their ability to safely and competently perform their duties.

The inspectors reviewed policies and procedures Command (CMD) 204-1, 204-2, 206-2, NDP No. 900-1 through 900-6 and Nuclear Security Procedures (NSP) 700-1 through 700-9 and found them to be thorough and comprehensive. During this review process some procedures were determined to be in need of updating. Examples discussed with the licensee were: NSP 700-9, Medical Review Officer Functions, dated January 4, 1990, the appendix which lists the drugs and cutoff levels was not consistent with other procedures (this was corrected during the inspection); NDP 900-6, Fitness for Duty Employee Assistance Program, dated December 29, 1989, was in need of clarification of the confidentiality issue with regard to those who self-refer to the Employee Assistance Program (EAP), (the licensee had a draft change prepared during the inspection); and NSP 700-7, Fitness for Duty Performance Data and Reporting, dated January 2, 1990, needed to be updated to be consistent with the reports submitted to the NRC. During interviews, the inspectors determined that the FFD staff indicated different ways of handling personnel testing positive for alcohol with less than .04%, however, the licensee had no procedural controls for handling these results. The need to conduct a thorough review of all FFD procedures was identified as a weakness.

3. Program Administration

a. Responsibilities

While the responsibility for the FFD Program is vested in the Manager, Nuclear Security Department, who reports to the Vice President, Nuclear, the program is equally supported by the Vice President, Human Resources Division. Both Divisions share in the formulation and execution of the FFD program at Trojan. Based on interviews of personnel in both divisions, the present organization is effective.

b. Management Responsibilities

Interviews with the different levels of the FFD staff indicated that they were trained, aware of their responsibilities and were dedicated to the success of the program.

c. Program Resources

Program resources appeared adequate. Through interviews and direct observation the inspectors considered the professionalism and expertise of the present Medical Review Officer, the Fitness for Duty Coordinator, and Supervising Medical Technologists as a significant strength.

A new FFD collection facility, outside the protected area, has been established and is adequate in size, equipment, and security to meet the objectives of the current program. Should the licensee decide in the future to conduct initial screening tests of urine specimens, some facility modifications will be necessary. The facility is secured during off-hours, and access during normal working hours is controlled by the FFD clerk. During a review of the facility, the inspectors observed that the sign-out column of the facility access log had not been completed for approximately ten percent of the clients.

The licensee staffs the FFD collection facility with contract laboratory technical personnel who are employees of Upjohn Health Care Services, Portland Oregon. The collection personnel are supervised by a licensee medical technologist. Based on interviews, review of their procedures and direct observations, these contract employees are well trained and qualified for their duties. The inspectors considered as a strength, the cross training between the laboratory technicians and the specimen couriers, and their ability to equally perform these duties.

d. Employee Assistance Program (EAP)

The inspectors determined through interviews, observations, and examinations that the EAP offers short-term counseling, assessment, referral services and treatment monitoring. This program also offers internal employee assistance and external assistance through a local hospital. Considered a significant strength is the Peer Support Program. This program is staffed by trained volunteer licensee employees recovering from a chemical addiction that give support to other employees dealing with similar addiction problems. Also considered a strength is the expertise, professionalism and caring attitude of the present EAP Specialist.

e. Worker Awareness

The inspectors interviewed 12 personnel subject to the licensee's FFD program. These personnel were selected using the licensee's computer generated random selection system, and included three supervisors (one of which was a contractor), and nine employees (four of which were contractors). Most of the personnel had been selected one or more times for FFD testing and all expressed the opinion that the FFD program was acting as a deterrent for drug abuse. Those personnel that had been FFD tested felt that their individual rights had been adequately protected under this program.

The licensee offers a bed-and-breakfast night for two at the Columbia Gorge Hotel (an elegant local resort hotel) for employees that have been selected for FFD testing. Each time an employee is selected for testing his/her name is entered in the quarterly drawing, e.g., the second time they are tested their name is put in twice, for a total of three chances; the third time they are tested their name is put in three more times for a total of six chances

etc.. Because of this drawing the FFD staff has received volunteers to be tested. (Note: the licensee does not accept volunteers)

4. Training

The licensee's FFD training program, for supervisors, escorts and plant employees appears to be adequate. Interviews with licensee and contractor supervisors and employees indicated they were knowledgeable of the FFD program and related sanctions. The senior resident inspectors' review of the training program, in December 1989, indicated that improvement could be made in the area of escort training. It was verified during this inspection that this improvement had been made, and that additional training improvements were planned in the near future for the supervisor training.

5. Reported Fitness For Duty Events

No events covered by 10 CFR, Part 26.73 have occurred. The licensee has reported unsatisfactory lab testing in accordance with Par. 2.8.e. of Appendix A, by letters dated February 28, 1990, May 25, 1990, June 21, 1990 and September 17, 1990.

(Closed) 10 CFR 26 Fitness For Duty Report, dated September 17, 1990. False Negative Laboratory Drug Test of Phencyclidine (PCP). The licensee reported that on August 14, 1990, they shipped 22 urine specimens to their HHS-certified laboratory in Seattle, Washington. Two of these specimens were blind performance test specimens, 17 were genuine samples submitted as part of the licensee's random screening program, and 3 were genuine preaccess samples.

Upon analysis of the specimens, the laboratory incorrectly reported one of the blind performance urinalysis test specimens, certified to contain 52 ng/ml of PCP, as a negative test result. The licensee's initial (and confirmatory) screening cutoff level of PCP is 25 ng/ml.

The licensee's report indicated that the laboratory had initially determined the sample in question to be positive for PCP. However, an incorrect aliquot sample (number) was used for the GC/MS confirmation testing, instead of an aliquot from the sample in question. The zero response of the GC/MS analysis was not investigated relative to the initial positive screening result.

The licensee reported that corrective measures have been instituted by the laboratory and that genuine samples submitted to the laboratory at the same time were deemed to be correctly interpreted and reported. The screening problem was identified by the licensee's quality assurance program, and blind test specimens are routinely submitted to the laboratory to ensure integrity of the testing and reporting process. The licensee has a high level of confidence in this laboratory's performance. This incident is the first occurrence of an administrative error by this laboratory.

6. Key Program Processes

a. Random Testing

By letter dated January 3, 1990, the licensee notified the NRC that the FFD Program was implemented and met the requirements of 10 CFR Part 26. They also advised that their cutoff levels for some drugs were more stringent than required. On March 8, 1990, the licensee notified the NRC of revised drug cutoff levels. It was determined during this inspection, that the increased drug panel e.g., Barbiturates, Methaqualone, Propoxyphene, Benzodiazapines, and Methadone metabolite, together with the lower cutoff level for Marijuana e.g., 20 ng/ml (initial screen test) is a strength of the program.

The licensee uses a computer generated random selection process to select employees and contractors for FFD testing. The program consists of two groups: Group I consists only of persons eligible for FFD testing that have never been selected, and group II consists of all personnel eligible for FFD testing (including those in Group I). Persons eligible for FFD testing consist of those persons badged for unescorted access to the protected area, plus those persons identified to respond to the Emergency Operations Center. The licensee's random generator selects approximately 50% from each group. As the groups fluctuate in numbers so does the selection percentage. The plant population is entered into Group II daily, Monday through Friday, by the FFD Clerk who receives changes made to the security access computer system. A quality control verification is made twice a month by a computer tape process that records each change to the two systems and compares them for errors or omissions. Interviews with the computer programmer and users determined that there were sufficient safeguards in effect to adequately protect the system.

The average plant population for the ten month period of 1/90 to 10/90 was 1,630. The licensee records indicated completion of 1,530 tests, 94% of the average population, which is equal to an annual rate of over 100%.

The licensee's testing process being applied after the random selection, revealed that the testing conducted each day (Monday through Friday) ranged from 14%-24%. On the other hand there was a 2% rate for Saturdays, and .6% rate for Sundays. For a ten month period, the number of off hours/weekends tests were administered as follows:

Time	Monday - Friday	Saturdays	Sundays
4 - 12	0	2	1
12 -8	2	1	1

This testing rate is considered a program weakness. During the exit meeting on November 16, 1990, the licensee indicated these

rates would be reviewed and changed, if necessary, to provide a more equal opportunity for FFD testing.

Employees and contractors with infrequent site access are included in the overall program described above. Once an individual with site access is selected for FFD testing, they have two hours to report to a PGE collection facility. If an individual for random screening is absent from work that day, the FFD staff will continue attempting to notify the individual over a 30-day period. Contract personnel for whom random selections are generated but not tested within 30 days will have their unescorted site access badge inactivated. These individuals are required to satisfactorily complete a urinalysis test prior to reactivation of their site access badge.

b. Specimen Collection

The licensee's collection kit (supplied by their HHS-certified laboratory) includes a specimen collection cup with an affixed temperature strip. During urinalysis testing, after the employee fills the cup with at least 70 ml of urine, he/she exits the restroom and returns the cup to the medical technician. The technician records the temperature after "reading" the temperature strip on the cup.

The inspectors noted that the affixed temperature strip allows the employee the opportunity to self-determine his/her specimen temperature prior to exiting the bathroom. Thus, if the employee attempts to introduce a surrogate urine specimen, the affixed temperature strip provides a means for the employee to self-determine the temperature of their surrogate urine sample. This was identified as a weakness. On November 26, 1990, M. Shaw, Trojan, telephonically indicated to D. Schaefer, Region V, that the Trojan Collection Facility will initiate use of collection cups without temperature strips, in early January 1991.

c. Chemical Testing

Licensee records indicated that from January through November 10, 1990, a total of 3,350 tests were conducted, of which 44% were for pre-access, (11 were positive); 28% were for reasonable suspicion, (7 were positive); 24% were random testing, (6 were positive); and 4% were follow-up testing (1 was positive).

In accordance with provisions of 10 CFR Part 26, seven licensee employees have been returned to work after positive test.

d. Records and Reports

A system of files and procedures to protect personal information contained in FFD related records had been developed. Such records were used and stored in an appropriate manner. Access to these records was strictly limited to FFD staff who had job-related "need-to-know" responsibilities.

Results of positive tests from the HHS-certified laboratory are electronically transmitted via a secure facsimile (fax) machine to a terminal in the MRO's office. The information remains stored at the terminal until it is printed. In order for the information to be printed, the MRO has to log into the fax machine with a special password.

Upon receipt from the laboratory of a positive drug urinalysis test, the MRO reviews all collection test records and interviews the person that provided the specimen. As a result of these actions, the MRO may (or may not) confirm the person as a user of drugs. If the MRO determines the person to be a confirmed user of illegal drugs, he immediately notifies the FFD coordinator. After reviewing the available records and interviewing the person, if the MRO determines that the person has not used drugs illegally, the licensee is not notified of any positive laboratory test results.

e. Self Assessment and Audits

Considered a strength was the licensee's self assessment program which included the following Quality Assurance audits and internal reviews of the FFD program.

Security Inspection Report No. 89-059, dated November 30, 1989
Security Inspection Report #90-006, dated January 22, 1990
QA Surveillance No. P-228, dated February 21, 1990
Security Inspection Report #90-014, dated February 28, 1990
QA Audit No. AP-637, dated March 23, 1990
Security Inspection Report No. 90-025, dated April 23, 1990
FFD Management Review (Self Assessment), dated September 28, 1990
Security Inspection Report No. 90-057, dated November 2, 1990

Collectively, the licensee's overall self assessment program was performed primarily by representatives from their Quality Assurance and Security Departments. A consulting clinical chemist and toxicologist (qualified as a Forensic Urine Drug Testing Inspector for the College of American Pathologists) also assisted in this program. All deficiencies and observations were corrected and documentation was available for NRC review. The inspectors observed that corrective measures were adequate and provided long-term improvements in the overall FFD program.

7. Entrance and Exit Interview

The inspectors met with the licensee representatives on November 13, 1990, to review the scope and schedule of the inspection. On November 16, 1990, the inspection results were summarized with those persons indicated in paragraph 1. With respect to the three program weaknesses identified, the licensee indicated that corrective action would be taken. With respect to the random selection testing for back shifts and weekends, the licensee indicated that after considering the reduced plant population during those times, the resulting rate may not be as disproportionate as originally determined.