

UNION ELECTRIC



Callaway Plant

February 1, 1991
ULNRC-2362

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

In complying with the Fitness For Duty Rule, 10CFR26.71(d), Recordkeeping Requirements, please find enclosed Union Electric's Callaway Nuclear Plant Fitness For Duty Program Performance Data for the six (6) month period beginning July 1, 1990 and ending on December 31, 1990.

Enclosures include:

- Attachment A - Fitness For Duty Program Performance Data Personnel
Subject to 10CFR26
- Attachment B - Random Testing Program Results/Confirmed Positive Tests
for Specific Substances (Five Year Record)
- Attachment C - Fitness For Duty Management Actions in regards to:
 - * Initiatives Taken
 - * Lessons Learned
 - * Reportable Fitness For Duty Events
under 10CFR26.73

If you have any questions in regards to the Performance Data Reported,
please contact me at (314)676-8500.

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DuPont Electric Callaway Plant
Fitness For Duty Program
Performance Data

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Union Electric Callaway Plant
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/QA Record (CA-758)
Nuclear Date (Sandra Auston)
E210.0001
CDN Chrono
D. F. Schnell
J. V. Laux
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**Fitness for Duty Program
Performance Data
Personnel Subject to 10CFR 26**

Union Electric Company	December 31, 1990
<small>Company</small>	<small>6 Months Ending</small>
Callaway Nuclear Plant	
<small>Location</small>	
Donna M. Knoepflein	314/676-8211
<small>Contact Name</small>	<small>Phone (include area code)</small>
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26	
Marijuana 20 / 15	Amphetamines 1000 / 250 <u>Barbiturates</u> 300 / 250
Cocaine 300 / 150	Phencyclidine 25 / 25 <u>Benzodiazepines</u> 300 / 250
Opiates 300 / 150	Alcohol (% BAC) .04% _____ /

Testing Result:	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access	1043				273		161	
Pre-employment	44	0			0	0	0	0
Pre-badging	6	0			21	0	755	11
Periodic	0	0			0	0	0	0
For cause	1	0			0	0	1	1
Post accident	0	0			0	0	0	0
Random	534	2			163	0	143	2
Follow-up	0	0			0	0	1	0
Other	5	0			0	0	1	0
Total	590	2	1	2	184	0	901	14

Random Testing Program Results

Individuals Tested	1989		1990		1991		1992		1993		
# Positive			0	4							
# Tested			654	840							
% Positive			0	.47							
Graph of % Positive	5										
	4										
	3										
	2										
	1										

Confirmed Positive Tests for Specific Substances

Marijuana			0	11						
Cocaine			0	4						
Opiates			0	0						
Amphetamines			0	0						
Phencyclidine			0	1						
Alcohol			0	1						
Benzodiazepines			0	3						
Barbiturates			0	1						

Fitness For Duty Management Actions

Initiatives Taken

In addition to reporting Fitness For Duty Program statistics to Plant Personnel on a quarterly basis via newsletter publications, Union Electric has implemented the following:

Included a 20-30 minute segment in Continued Employee Observation Training in which a Fitness For Duty Program Representative provides review of FFD Program statistics, progress of the FFD Program, and discusses potential changes that may occur to the program in the future. Time is also allocated for a question and answer session.

The Medical Review Officer is also included in this segment when he is available to explain his role in the program and provides a question and answer session for Training Participants. We strongly emphasize to Plant Supervisors during these Training Sessions to utilize the MRO to clarify any questions they may have in regards to (ie: effects a specific drug may have on their system, the effects of poppyseed, etc.).

The Training Department has also included additional information in CEO Training in an attempt to clarify Testing for Cause Procedures. Several case studies are included for Training Participants to review and discuss if case studies were handled correctly and if not, provide critique on how these case studies should have been handled to comply with Union Electric's Fitness For Duty procedures.

Feedback received from Training Participants indicate this additional Training/Communication is having a positive effect by providing Plant Supervisors with: (1) the Supervisor's role and responsibility in the FFD Program, (2) better understanding of FFD Program administration, and (3) FFD Program requirements.

To improve short-term cold storage of urine specimens, Union Electric purchased a blood bank type refrigerator for storage of specimens. This refrigerator, by design, enhances the capabilities of storing these specimens in accordance with temperature requirements in 10CFR26. This refrigerator is also equipped with built-in temperature/monitor controls that will continue to monitor and record the temperature of the cooling unit when electrical power is interrupted.

Lessons Learned

We have learned through the first year of operation that our random selection program supports the projection that the 100% random testing rate results in approximately 2/3rds of the badged workforce being subjected to random testing at least once during the year. The following provides a projected % / actual % the badged workforce was subjected to random testing zero through six times.

	<u>% of Individuals Projected To Be Randomly Screened Per Assessment Report AP89-024</u>	<u>% of Individuals Actually Randomly Screened</u>
SCREENED ZERO	36.8	32.53
SCREENED ONCE	36.8	44.11
SCREENED TWICE	18.4	16.27
SCREENED THREE TIMES	6.1	5.49
SCREENED FOUR TIMES	1.5	1.20
SCREENED FIVE TIMES	.3	.33
SCREENED SIX TIMES	.0	.07

During 1990 Union Electric learned that the positive rate associated with our FFD Program is generally lower than the positive rate throughout the Nuclear Industry reported for the first six months of 1990. Union Electric performed a combined total (all testing categories) of 2,513 screenings on Licensee and Contractor Employees. A total of sixteen (16) specimens were confirmed positive by the Medical Review Officer (15 for drugs and 1 for alcohol). The positives were associated with three (3) testing categories: (1) Pre-badging, (2) For Cause, and (3) Random.

Union Electric's positive rate in these three (3) categories for the first year implementation of 10CFR26 as compared to the Nuclear Industries positive rate for the first six (6) months of 1990 as reported in the NUMARC Workshop Proceedings Manual, is as follows:

NUCLEAR INDUSTRY POSITIVE RATE FOR
JANUARY - JUNE, 1990

UNION ELECTRIC POSITIVE RATE FOR
JANUARY - DECEMBER, 1990

CATEGORY	Licensee Employees (Average # with Unescorted Access: 1184)	Contractor (LT/ST Average # with Unescorted Access: 959)	Licensee Employee (Average # with Unescorted Access: 1043)	Contractor (LT/ST Average # with Unescorted Access: 434)
	Pre-Badging			
Number Tested	9268	36,293	41	906
Number Positive	118	574	0	11
Average % Positive	1.27	1.58	0.00	1.2
For Cause				
Number Tested	164	168	1	1
Number Positive	39	50	0	1
Average % Positive	23.78	29.76	0.00	100.0
Random				
Number Tested	50,395	23,175	1,059	435
Number Positive	152	146	2	2
Average % Positive	0.30	0.63	0.19	0.46

An additional interesting lesson learned is, of the sixteen (16) positives, (11) tested positive for marijuana under Union Electric's more stringent screening cutoff level of (20ng/ml). If Union Electric were utilizing the screening cutoff level of 100 or 50 (ngml), the confirmed positives for marijuana would have been as follows:

100 ngml - 0 positives for marijuana
50 ngml - 7 positives for marijuana

Union Electric Callaway Plant operates an onsite testing facility. The onsite facility utilizes a Fluorescence Polarization Immunoassay (FPIA) technique. The DHHS certified laboratory uses an Enzyme Multiplied Immunoassay Technique (EMIT).

As an internal QC check, our procedures require the Medical Review Officer to track the number of specimens screening positive onsite verses not confirmed at the DHHS certified laboratory.

Lessons learned from this program are that:

- (1) Different assays utilized by the onsite testing facilities and the DHHS laboratory do trigger differences in quantitative screening test results.
- (2) Identified equipment problems as the source of testing differences.
- (3) Use of low cutoff levels may attribute to testing differences between the two assays.
- (4) The MRO should use absorbance values for negative controls to better pinpoint testing discrepancies.

Events Reported In Accordance With 10CFR26.73

One event occurred during this reporting period requiring reporting in accordance with 10CFR26.73.

Date/Time of Event: October 17, 1990 at 0203

Date/Time Event Reported: October 17, 1990 at 0450

Brief Summary of Event: A bag of white powder substance confirmed as amphetamines was located by a plant worker on the 2065 elevation of the Turbine Deck. The substance was located in the Men's Restroom inside an access panel into the plumbing crawl space.

There were no Test for Causes conducted as part of the event whereas this area is accessible to a large population of badged personnel.

A precautionary measure taken as a result of this event was, all like areas in the Protected Area in which the substance was located were searched to ensure no other substances were located in these areas. This investigation was completed without further incidents.