U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-454/91004(DRSS); 50-455/91004(DRSS) Licenses No. NPF-37; NPF-66
50-254/91004(DRSS); 50-265/91003(DRSS) DPR-29; DPR-30

Docket Nos. 50-454; 50-455
50-254; 50-265

Licensee: Commonwealth Edison Company
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Inspection At: Corporate Offices, Downers Grove, Illinois, January 22, 25, 1991
Corporate Offices, Chicago, Illinois, January 24, 1991
Byron and Quad Cities Sites - January 23, 1991

Inspectors: James Belanger 2/20/91
James Belanger Date
Senior Physical Security Inspector

James Belanger for 2/20/91
James R. Knicely Date
Physical Security Inspector

Approved By: James R. Creed 2/22/91
James R. Creed, Chief Date
Safeguards Section

Inspection Summary

Inspection on January 22-25, 1991 (Reports No. 50-454/91004(DRSS); No. 50-455/91004(DRSS); No. 50-254/91004(DRSS); No. 50-265/91003(DRSS))
Scope: This special, announced inspection reviewed the licensee's Fitness-for-Duty (FFD) program required by 10 CFR Part 26. The review was conducted in accordance with Temporary Instruction (TI)2515/106. Specifically, the inspection included the licensee's drug and alcohol abuse policies and procedures; program administration; employee awareness and understanding of the program; selection and notification for random testing; documentation; sanctions and appeals; audits; specimen collection facilities and procedures; training program; and reported FFD events.
Results: Based on the selective examination of key elements of the licensee's

Fitness-For-Duty Program it was concluded that the licensee is satisfying the general performance objectives of 10 CFR 26.10. Several program strengths were identified. Program strengths included the strong management support for the program, the effective communication/coordination of the corporate and site Fitness-for-Duty staffs, the conditions and quality of the specimen collection facility at the Quad Cities Station, and the comprehensive appeals process.

An unresolved item was identified in reference to testing for cause for both drugs and alcohol in instances when only alcohol use is suspected. (See Section 2, for details.)

DETAILS

1. Key Persons Contacted

In addition to the persons listed below, the inspectors interviewed other licensee employees and contractor personnel. The asterisk (*) denotes those present at the Exit Interview conducted on January 25, 1991.

*K. Graesser, General Manager PWR Operations, Commonwealth Edison Company (CECo)
R. Bax, Station Manager, Quad Cities Station
R. Pleniewicz, Station Manager, Byron Station
*D. Shamblin, Construction Manager, ENC, CECo
*R. VanHam, Industrial Relations Manager, CECo
*M. Balster, ENC FFD Coordinator, CECo
*J. Kudalis, Services Director, Byron Station
*D. Goble, Station Security Administrator, Byron Station
*E. Zittle, Regulatory Assurance, Byron Station
*F. Willeford, Nuclear Security Administrator, CECo
*G. Toleski, FFD Program Administrator, CECo
*J. Sirvoy, Services Director, Quad Cities Station
*K. Leech, Station Security Administrator, Quad Cities Station
*P. Welsh, Assistant FFD Program Administrator, CECo
*J. Zucchi, FFD Analyst, CECo
*A. Torrez, Assistant Security Administrator, Zion Station
*P. Laird, Director Corporate Security, CECo
*R. Haley, MRG, CECo
*E. Pierard, ENC Staff, CECo
*R. Enkeboll, Senior Project Manager, NUMARC
*S. Trubatch, Counselor, Sidley and Austin
D. LaBelle, Coordinator EAP Services, CECo
F. Woodin, Industrial Relations Supervisor, CECo
M. Whitemore, Assistant Security Administrator, Byron Station
D. Ringo, Corporate Security, CECo
B. Rittmer, Security Staff, Quad Cities Station
W. Holland, Assistant Security Administrator, Quad Cities Station

W. Kropp, Senior Resident Inspector, Byron Station
T. Taylor, Senior Resident Inspector, Quad Cities Station
R. Bocanegra, Resident Inspector, Quad Cities
J. Shine, Resident Inspector, Quad Cities

2. Entrance and Exit Interviews (IP 30703)

At the beginning of the inspection, Mr. K. Graesser, General Manager, PWR Operations and other members of the licensee's staff were advised of the purpose of the visit and the functional areas to be inspected.

The inspectors met with the licensee representatives denoted in Section 1 at the conclusion of the inspection on January 25, 1991, and advised the representatives that the inspection had been a selective examination of their Fitness-for-Duty (FFD) program utilizing TI 2515/106 to determine whether it meets regulatory requirements. They were also advised that

each inspection finding would be reviewed by both NRC Region III and NRR Headquarters management prior to the inspection report being finalized.

Our review concluded that the FFD program had been effectively developed, implemented, and monitored, and was meeting the general performance objectives of 10 CFR 26.10. However, the following three issues will be forwarded to NRR Headquarters for review as an unresolved item.

a. The procedure entitled "Testing For Cause" allowed that a test only for alcohol or drugs be done. That appeared to conflict with 10 CFR 26.24 and paragraph 2.1(a) of Appendix A, Subpart B, which require a for-cause test include all drugs and alcohol. The issue was described as an apparent violation.

   Subsequently, on January 28, 1991, the FFD Program Administrator was notified that this issue would be carried as an unresolved item and forwarded to NRR Headquarters for a determination if the implemented practice described in the procedure was in compliance with the intent of 10 CFR 26.

b. The "Testing For Cause" procedure also required that a representative from the Nuclear Industrial Relations Department and/or the Medical Department must be contacted before a test be given. This appears to be potentially different from 10 CFR 26.24(a)3, which requires the test be given "as soon as possible" after the observed behavior.

c. The procedure further indicates that a "for-cause" test need not be administered if a representative from the Medical Department cannot be reached. Failure to test for-cause under those circumstances could violate 10 CFR 26.24(a)3.

Licensee management representatives stated that their procedure will be changed to require alcohol and drug testing for any for-cause testing. On January 28, 1991, the FFD program administrator stated that letters have been issued to all the Commonwealth Edison Company (CECo) sites requiring both alcohol and drug testing for all for-cause testing. Licensee management representatives further stated that our findings would be evaluated to determine appropriate actions to be taken to address each issue.

The inspectors also pointed out what appeared to be some of the strengths of the licensee's FFD program. The management support, level of effort and qualifications of the FFD staff were notable. Effective staff coordination, communications and excellent day-to-day program oversight were considered a program strength. The location and design of the Quad Cities onsite testing facility enabled the licensee to have good control over the process. The facility was new, well-equipped and well run. The licensee's appeals process appeared very comprehensive and was also considered a program strength.

3. Inspection Approach (MC0610)

By letters dated November 21, 1990, the licensee was notified of the dates and scope of this inspection. They were requested to provide the latest revisions of the required FFD policies and procedures, which were reviewed in-office prior to the onsite inspection. The inspectors also reviewed the licensee's semi-annual report of program performance data for the period ending June 30, 1990. The results of the Resident Inspectors' evaluations of the initial training sessions conducted at the Byron and Quad Cities stations were also reviewed.

Onsite inspection activities included interviews of the key individuals responsible for program implementation and included, for example, the Medical Review Officer, the FFD Program Administrator, the Coordinator - Employee Assistance Program Services, and specimen collection personnel at the Byron and Quad Cities stations. Additionally, 12 randomly selected personnel, to include supervisors and non-supervisors, were interviewed at the two stations.

The inspectors also conducted a tour of the onsite specimen collection facilities at the Byron and Quad Cities stations. Record storage areas and protective measures at the licensee's corporate office were also reviewed.

Several audit reports, training videos, suitable inquiry files and other FFD related records were also reviewed by the inspectors.

4. Written Policies and Procedures (TI 2515/106-05.01C)

The licensee's written policies and procedures were reviewed and compared to the requirements of 10 CFR Part 26 to assure that they were comprehensive and of sufficient clarity and detail to support the implementation of the program. The inspectors had the following observations:

A written comprehensive policy of Fitness-for-Duty was found in Nuclear Operations Policy (NOP)-OA.5 entitled "Commonwealth Edison Fitness-for-Duty Policy" and Corporate Nuclear Security Guideline No. 200 entitled "Commonwealth Edison Fitness for Duty Program." A copy of the policy is distributed to each employee and contractor during General Employee Training. Interviews with employees indicated that the policy was effectively communicated through training.

Written procedures were developed which adequately detail responsibilities for important aspects of the program involving, but not limited to, the treatment of presumptive positive tests, selection and notification of individuals for testing, collection and processing of specimens, and the medical review officer's review of tests and notification. There was one procedure, Corporate Nuclear Security Guideline No. 207, "Testing for Cause," which was determined by the inspectors to be in potential violation of 10 CFR Part 26 and contrary to NRC guidance.

a. The licensee's Corporate Nuclear Security Guideline No. 207 entitled, "Testing For Cause," is written to allow the licensee to test for alcohol and/or drugs. 10 CFR 26.24(4.c) requires

the licensee to test for all substances described in paragraph 2.1(a) of Appendix A, Subpart B., which identifies that licensees shall test for marijuana, cocaine, opiates, amphetamines, phencyclidine, and alcohol for pre-access, for-cause, random, and follow-up tests. The licensee's policy to only test for alcohol when only alcohol is suspected appears to be in violation. The licensee agreed to start testing for drugs and alcohol during any for-cause testing. Subsequent to the inspections, on January 28, 1991, after further review with NRR Headquarters personnel, this issue of only testing for alcohol will be sent to NRR for further review and classified as an unresolved item. On January 28, 1991, the licensee's FFD Program Administrator was advised that the proposed violation which was briefed at the exit interview will be forwarded to NRR as an unresolved item. He indicated that they will start testing for drugs and alcohol for any for-cause tests until the issue is resolved. (50-254/91004-01; 50-265/91003-01;) (50-454/91004-01; 50-455/91004-01)

b. The licensee's for-cause tests procedure as identified above also requires that (1) the Medical Department be contacted if a CECo employee is observed to be impaired or displaying aberrant or atypical behavior and (2) the Medical Department (Medical Review Officer) determine if drug and/or alcohol testing is required. It is the NRC position that the Medical Review Officer (MRO) as identified in 10 CFR 26.3 is to interpret and evaluate test results and not to determine if tests are needed. Evaluation of for-cause testing is to be determined by onsite management personnel who can adequately evaluate the individual and the individual's performance as soon as possible following any observed or suspected substance abuse. This issue will be included as part of the above unresolved item.

c. This same for-cause procedure allows the individual involved to be taken home and not tested if the MRO cannot be contacted. The licensee stated that to the best of their knowledge, this has not occurred. The inspectors identified that this procedure as written would allow a for-cause test not to be done which is a potential violation of 10 CFR 26.24(a)3. The inspector identified that 10 CFR Part 2, Supplement VII B, identifies the failure to test for cause of an individual within the protected area who is possibly unfit for duty based on drug or alcohol use as a Severity Level II violation. This issue will be included as part of the above unresolved item.

5. Program Administration (TI 2515/106 05.02a): No violations or unresolved items were identified.

a. The overall program administration was effectively monitored with several strengths noted. The Fitness-for-Duty Program Administrator was extremely knowledgeable of program requirements, procedural guidance, and interdepartmental responsibilities. The FFD Program Administrator appeared to be an effective focal point to resolve FFD issues and established effective liaison with all nuclear stations and supporting departments. A very high level of consistency in FFD program implementation existed between the corporate offices and the licensee's nuclear stations. The

Assistant FFD Program Administrator also displayed an excellent knowledge of program requirements and functions. The program oversight and monitoring as described above by the FFD staff was considered a program strength.

b. Program responsibilities are clearly described in the licensee's procedures and major FFD program functions have been appropriately assigned. The FFD program is centralized at the Corporate office, under the Director of Security.

c. The key FFD staff members have the necessary training and experience to fulfill their program responsibilities. Key members of the licensee's FFD organization were interviewed by the inspectors and found to be very knowledgeable of their responsibilities.

d. Licensee management support for the FFD program was evident. Corporate level managers and supervisors were assigned program responsibilities and an excellent specimen collection facility at the Quad-Cities station was available. One member of the corporate staff (the FFD Program Administrator) was assigned to perform overall program coordination and monitoring on a full-time basis. The appeals Review Board consists of an impartial, internal management group appointed and chaired by the Senior Vice President for Nuclear Operations or his designee.

e. The MRO was interviewed by the inspectors on January 22, 1991. He is a licensed physician in the State of Illinois. He has been involved with the licensee's drug and alcohol program since its inception in 1982. He stated that he has been self taught in the drug/alcohol area through frequent attendance at conferences and training sessions. In 1990, he attended the "Medical Review Officer Training Course for Urine Drug Testing" sponsored by the American College of Occupational Medicine. The MRO is a full time licensee employee and maintains an office adjacent to the FFD Program Administrator.

The MRO is responsible for determining confirmatory drug test results at or above the cut-off level as positive or negative by evaluation of the disclosures on the consent form, review of medical history of the person tested, verification of prescriptions, and communications with the person tested. This determination is accomplished within 10 days of completion of the initial presumptive positive test. The MRO stated that his evaluation included a review of chain-of-custody documentation.

6. Worker Awareness (TI 2515/106-05.02c):

The inspectors interviewed 12 randomly selected persons, including supervisors, and licensee and contractor employees. The personnel interviewed generally believed that the FFD program deterred drug and alcohol abuse. They believed that the FFD selection process for testing was random in nature, in that supervisors could be selected for testing just as frequently as nonsupervisors and that contractors are tested as frequently as company employees. No "safe periods" for drug abuse were

identified in that the personnel believed that random testing could be conducted at any time to include backshifts, weekends, and holidays. The licensee personnel interviewed were familiar with the EAP services available to them and believed such services would be provided in a confidential manner. Contractor personnel interviewed indicated that they were aware of the Commonwealth Edison Company "Get Well Program" provided to individuals who are denied access for a violation of the FFD program. Completion of the program could provide them an opportunity to have their eligibility for unescorted access restored.

7. Program Elements (TI 2515/106-05.02c)

a. Selection and Notification for Random Testing

The FFD Program Administrator and site FFD security personnel control the random drug and alcohol testing using procedures identified in the Corporate Nuclear Security Guidelines. Random testing is conducted at an annual rate equal to at least 100% of all individuals with unescorted access to the protected area and EOF responders. The list of individuals with unescorted access is continuously updated. Personnel are selected in a statistically random manner so that all personnel eligible for testing have an equal probability of being selected. A person completing a random test is immediately eligible for another random test. The percent of workers selected each week from each established pool is sufficient to obtain an average of 2% per week per pool. Testing is administered on at least a weekly frequency and at various times during the day with limits and conditions on the time allowed for personnel to report to the collection site.

Interviews with FFD personnel disclosed that all personnel in the random selection pools are subject to the same testing criteria regardless of frequency of access to the site. Perceptions of safe periods are countered by testing periodically on backshifts, weekends and holidays.

The FFD Program Administrator is responsible for notifying specimen collection personnel and FFD site personnel of the test dates, places, and times in advance of test dates. On test dates, supervisors are contacted with names and times of personnel to be tested. Workers are notified by their supervisor that they have been selected for testing as close as possible to the actual collection time. Personnel failing to report to the collection site at their scheduled time are reported to the FFD coordinator and their immediate supervisor.

Random Selection Reports (RSRs) are produced at printer terminals that are at controlled locations and access to the selection reports is limited to FFD staff personnel. The licensee maintains confidentiality of these reports until all testing of personnel on the report has been completed or properly excused from testing based on established criteria. Worker scheduled test dates are completed the day of the selection and workers are not advised of their selection for testing until a few hours before their testing time.

Random Selection Reports (RSRs) may be generated on various days of a week and may also be generated two or more times within a week.

The licensee has contracted with CSM Mobile, Ltd. for collection and testing services. CSM Mobile, Ltd. is located in Lisle, Illinois. The licensee uses Bio-Analytical Technologiss, Chicago, Illinois, as their Health and Human Services (HHS) certified laboratory.

The licensee's testing cutoff levels are the same as those listed in 10 CFR Part 26, Appendix A, except for marijuana metabolites for which their test rate is 50 ng/ml for the initial sample. The confirmed test is the same as identified in the regulation.

b. Documentation

The licensee has developed adequate systems for documenting the key elements of the FFD program and for assuring the protection of information. The licensee's policy for limiting access to information to those with a clear need-to-know is identified in Corporate Nuclear Security Guidelines. Selection lists, chain-of-custody forms, tests results, the permanent log, and individual FFD files are carefully protected. The design of the various records is adequate to assure that all relevant information is collected and can be retrieved when needed. An inspection of a sample of the records showed them to be legible and complete. Physical security for the records is adequate. Files are kept in locked cabinets. The FFD program personnel were knowledgeable concerning the data storage requirements outlined in the rule.

c. Sanctions and Appeals

The licensee's Policy and FFD Procedures are consistent with required actions identified in 10 CFR 26. These procedures indicate that the first confirmed positive drug test results in denial of unescorted protected area access for a minimum of 14 days and referral to the Employee Assistance Program (EAP). Any subsequent confirmed positive test results in denial of access for three years. Any individual involved in the sale, use or possession of illegal drugs within the protected area will result in the person's denial of access for five years.

The rule does not identify sanctions for abuse of alcohol, valid prescriptions or over-the-counter drugs. However, impaired workers are removed from work activities, their access authorization is denied, and mandatory medical review and/or rehabilitation is required prior to reinstatement. Should a person be retained after an initial FFD policy violation, sanctions imposed are in accordance with the rule.

Licensee Employee Assistance Program referral is not provided to contractor personnel, so their drug or alcohol abuse normally results in denial of unescorted access and referral to their employer for whatever actions the employer deems appropriate. The licensee does provide contractors a "get well program" to allow

individuals who are denied access for violation of the FFD program an opportunity to have their eligibility for unescorted access restored. The specific "get well" requirements are determined on a case-by-case basis as the individual requests participation in the program. The requirements of the program cover minimum non-eligibility period, rehabilitation program, and follow-up test requirements.

The licensee's appeal process for a positive alcohol or drug determination has been established in procedures and meets or exceeds rule requirements. The MRO notifies the individual of a confirmed positive test results and offers an opportunity to discuss the results prior to notifying the FFD Administrator. The individual is given the opportunity to request that the reserve sample be screened and confirmed by the laboratory.

The licensee has established a Review Board comprised principally of senior management and medical personnel. The Review Board is responsible for overseeing the appeal determinations made by the Director of Corporate Security. At least three CECo management representatives must be present for the Review Board to conduct business and will meet as often as necessary to decide appeals and petitions in a timely manner. The inspectors determined that this appeal process with senior management participation and oversight is a program strength.

d. Audits

The annual audit required by 10 CFR 26.80 was conducted under contract by Bensinger, DuPont and Associates (BDA) between February 22 and March 13, 1990. Dr. Jerry Leiken of Rush-Presbyterian St. Luke's Medical Center participated on May 11, 1990. Bensinger, DuPont and Associates audited the overall program, focusing on company policy, implementing procedures and FFD training of licensee and contractor employees. Dr. Leiken audited on-site specimen collection and testing and audited laboratory activities at Bio-Analytical Technologies. In addition to the annual audit, the licensee's Quality Assurance department has performed some administrative and implementation surveillances of the FFD implementation practices. The auditors concluded that the Commonwealth Edison Company FFD program meets or exceeds the requirements outlined in 10 CFR 26 including Appendix A.

The inspectors concluded that the licensee's audits were thorough and were successful in identifying and correcting weaknesses in their FFD program.

8. Specimen Collection Facility (TI 2515/106-05.02d)

On January 23, 1991, the inspectors conducted a tour of the specimen collection facilities at both the Byron and Quad-Cities stations. The facility at Quad-Cities was newly constructed, provided a professional and orderly environment, and was spacious enough for the intended purpose. The facility at Byron consisted of a converted trailer. This

facility was adequate in meeting the needs of a collection location. The FFD Program Administrator stated that they intend to construct facilities similar to the Quad-Cities collection facility at each of their nuclear sites in the near future. The specimen collection facility at Quad-Cities was considered a strength of the program.

Both facilities are routinely locked when not in use and access to the facilities is recorded on a log. Keys to the facilities are controlled and access to them is limited to personnel with FFD related responsibilities. Both facilities are alarmed when not in use. Adequate security measures were observed.

Effective measures were implemented to prevent subversion of specimens. Blueing agent was used in the toilet facility, and the sink area used for hand washing was easily visible to the personnel performing the specimen collection process.

Administrative forms such as chain-of-custody forms and the Permanent Record Book were readily available. Additionally, a locked container was available in the specimen collection facility to store collected specimens.

The inspectors interviewed the collection personnel during a walk-through of the specimen collection process. The collection personnel were knowledgeable of their duties. Personnel were sensitive to the need to prevent potential tampering with the specimen, and the need to conduct the collection in a professional manner that assures the modesty and privacy of the individual being tested.

Interviews with the FFD Program Administrator confirmed that the specimen collection personnel had background investigations completed using the criteria for unescorted access authorization. The inspectors reviewed six randomly selected personnel records and found them to be accurate and complete.

9. Training Program (TI 2515/106-05.01a)

The licensee's awareness training conducted prior to the January 3, 1990 effective date of the Rule was reviewed by the Resident Inspectors and evaluated using TI 2515/104. The training was found to be acceptable. During this inspection, a limited sampling of employees and contractors were interviewed and found to be knowledgeable of the FFD Program and their individual responsibilities. The FFD training program is administered by the licensee's training department. The inspectors reviewed video tapes that are utilized during the general awareness, escort training, and supervisory training and found them to be thorough and appropriate for their intended purpose. Also noted was the fact that the EAP Services Coordinator has instructed portions of the training program for the purpose of fostering a better understanding and acceptance of the EAP services.

The inspectors reviewed a selected small sample of records to assure that individuals with access to the protected area had received FFD training, and that supervisors had received continuous observation

training. It was also determined that a system is in place to identify when refresher training is needed.

All workers interviewed appeared to be generally supportive of the FFD program and its goals. They appeared to have a high level of confidence in the integrity of the onsite collection and testing process and the FFD personnel.

The licensee maintains an Employee Assistance Program (EAP) that is available to all Commonwealth Edison (CECo) employees. Employees are encouraged to use the EAP as needed. A review of usage statistics indicates that employees do make use of the EAP. They appeared confident that their confidentiality would be maintained. Interviews with plant staff indicated both a willingness to use the EAP and a willingness to refer others to the EAP. The licensee has had a EAP program since 1979.

10. Reported FFD Events (TI 2515/106-05.01a)

a. Byron

A random test conducted on January 22, 1990, yielded a confirmed positive test for a contractor supervisor. Unescorted access was denied on January 30, 1990. Upon receipt of a confirmed positive test result, this event was reported to the NRC on January 31, 1990.

b. Quad-Cities

A for-cause test was conducted on April 8, 1990, as a result of a behavioral observation. The test yielded a positive test result on a contractor supervisor. Unescorted access was denied immediately and this event was reported to the NRC on the date of occurrence.

A random test conducted on June 26, 1990, produced a positive test for a contractor supervisor. Unescorted access was denied on July 3, 1990, upon determination of the positive test result. This event was reported to the NRC on the date of access denial.

On November 27, 1990, a random test produced a positive test result for a licensee supervisor. Unescorted access was revoked on November 27, 1990. The NRC was notified on November 27, 1990.

In each of the reported events, the licensee conducted a work investigation that concluded that all safety related work performed by the individuals did not disclose any performance concerns.

On April 17, 1990, the licensee notified the NRC of three administrative errors committed by Bio-Analytical Technologies (BAT) during the handling of three confirmed positive drug tests. These three errors caused the laboratory to erroneously report three confirmed positive drug tests as negative to Commonwealth Edison. After consultation with the Medical Review Officer (MRO), the individuals were subsequently denied access to CECo nuclear facilities for violation of their FFD policy.

On November 5, 1990, the licensee notified the NRC that BAT reported a blind positive urine specimen as negative. The BAT Laboratory Manager was requested to re-evaluate the negative confirmatory test result. The Laboratory Manager informed the licensee that the reviewing Laboratory Chemist had misinterpreted the GS/MS graph and the specimen actually confirmed positive.

The results of investigations by Commonwealth Edison Management showed that the negative reports were caused by human error and that these were isolated incidences. Corrective actions implemented by the laboratory appear sufficient to prevent recurrence of similar errors. It is also the policy of the MRO to review each reported presumptive positive or spiked sample which is not confirmed positive by the test laboratory. The inspectors determined that these anomalies were adequately reviewed and reported.

c. Program Performance Data

Program performance data required by 10 CFR 26.71(d) for the period between January 3 and June 30, 1990, was reported to the NRC by letter dated August 22, 1990. The performance data included the licensee's corporate offices and all their nuclear stations.

For the period July 1, 1990 through December 31, 1990, 343 random tests were conducted on licensee employees at the Quad Cities station. This number combined with 440 similar tests conducted during the first reporting period totaled 783 and produced a random annual test rate of 109% of an average of 720 station assigned licensee employees with unescorted access. For contractors, the licensee conducted a total of 864 tests and a resulting annual test rate of 102% of an average 720 assigned contractors with unescorted access. Twenty-three positive tests resulted in either denial or revocation of the individual's unescorted access. Additionally, one revocation of unescorted access occurred due to an individual refusing to participate in "For-Cause" testing required due to behavioral observations. Also, unescorted access was denied when an individual failed to report for a test required because of receipt of a diluted specimen on a previous test. The licensee's testing rate and reports appear adequate to meet the requirements of 10 CFR Part 26.

For Byron station, for the period of January 3, 1990 through June 30, 1990, 478 random tests were conducted on the station assigned licensee work force averaging 833 employees. This resulted in a random test rate of 57%. For the same period, 473 random tests were conducted on a contractor workforce averaging 818 employees. This produced a random test rate of 58%. Nine positive tests resulted in either denial or revocation of the individual's unescorted access. The reports for the second reporting period were being completed at the time of this inspection. The licensee's testing rate and reports appear to meet the requirements of 10 CFR Part 26.