



Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

Kurt M. Haas  
Plant Safety and Licensing Director

February 24, 1995

Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT  
DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT  
SEMI-ANNUAL FITNESS FOR DUTY PROGRAM PERFORMANCE REPORT

Attached is Consumers Power Company's Semi-Annual Fitness for Duty Program Performance Report for the period July 1, 1994 through December 31, 1994. This report is submitted in accordance with the requirements of 10 CFR 26.71(d).

SUMMARY OF COMMITMENTS

This letter contains no commitments.

Kurt M. Haas  
Plant Safety and Licensing Director

Attachments (2)

CC Administrator, Region III, USNRC  
NRC Resident Inspector - Palisades  
NRC Resident Inspector - Big Rock Point

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## **ATTACHMENT 1**

Consumers Power Company

Palisades Plant Docket 50-255  
Big Rock Point Plant Docket 50-155

Semi-Annual  
Fitness For Duty Program  
Performance Report

July 1994 - December 1994

2 Pages

CONSUMERS POWER COMPANY  
FFD PROGRAM PERFORMANCE REPORT  
July 1994 - December 1994

1. MANAGEMENT SUMMARY

During this reporting period, Consumers Power Company conducted a total of 403 random tests with the following results:

	<u>Random Tests</u>	<u>Results</u>
Employees	335	Random test process did not identify any positive drug/alcohol results.
Contractors	68	One positive THC determination; unescorted access was terminated.

The year-end positive drug/alcohol rate, as compared to previous year-end results, indicate a constant trend for employees and a slight upward trend for contractors/vendors (C/V's).

	<u>Random Tests</u>		<u>Positive Rate</u>		<u>Leading Substance</u>	
	<u>Employees</u>	<u>C/V's</u>	<u>Employees</u>	<u>C/V's</u>	<u>Cocaine</u>	<u>THC</u>
1990	1,351	845	0.2%	0.9%	4	7
1991	1,431	514	0.2%	0.6%	3	2
1992	1,290	392	0.6%	0.5%	4	5
1993	1,293	453	0.2%	0.2%	2	1
1994	652*	144*	0.2%	0.7%	1	1

\*Random testing rate was reduced from 100% to 50% beginning January 1, 1994.

A total of 289 pre-access tests were administered with three (3) confirmed positive results (1 alcohol, 2 THC). All affected personnel were denied access.

One follow-up test on a supervisor resulted in a second positive cocaine determination. The employee was terminated. This event is detailed in Section 3, "Reportable Events Under 10CFR26, Section 26.73."

One employee refused to cooperate with the follow-up test process and was terminated. The employee was originally identified with a positive alcohol determination.

The appeal process was not initiated on any of the confirmed positive test determinations during this reporting period.

2. INITIATIVES TAKEN

Actions are underway to develop a computerized method of entering pre-access data in a more expeditious manner. This method will have one time data entry thus eliminating delays due to manual distribution. Several modifications to the existing random/access authorization system are in a testing phase with completion expected prior to the next scheduled Palisades Plant outage.

3. REPORTABLE EVENTS UNDER 10CFR26, SECTION 26.73

One reportable event involving a site supervisor testing positive for cocaine through the follow-up testing process occurred during this six month interval. Upon the MRO's confirmation of the positive determination, unescorted access was immediately revoked and NRC notification made. The employee's supervisory duties were in an administrative area.

A thorough review of the supervisor's previous work was performed by the individual's supervisor and found to be satisfactorily performed.

4. TEST RESULTS BY PROCESS STAGE

CPCo does not take action against presumptive positives for THC or cocaine.

5. LESSONS LEARNED

An internal audit of FFD random collections found recurring problems with the administration of breathalyzer testing at one site. It was concluded that the breathalyzer tests as administered would have indicated alcohol consumption such that unescorted site access would not have been granted, but the blood alcohol levels indicated by the instruments would have been lower than actual blood alcohol levels. Corrective actions which include weekly review of the collection process and a stronger self-assessment program were developed.

## **ATTACHMENT 2**

Consumers Power Company

Palisades Plant Docket 50-255  
Big Rock Point Plant Docket 50-155

Semi-Annual  
Fitness For Duty Program  
Performance Data

July, 1994 - December, 1994



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

Consumers Power Company		December 31, 1994
<small>Company</small>		<small>6 Months Ending</small>
Palisades Nuclear Plant		
<small>Location</small>		
Judith A Smith	(517) 788-7072	
<small>Contact Name</small>		<small>Phone (include area code)</small>
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26		
Marijuana	/	Amphetamines    /
Cocaine	/	Phencyclidine    /
Opiates	/	Alcohol (% BAC)    Any detectable for situations other than random    /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		711		N/A		219	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		26	0	--	--	194	1
For Cause	Post accident	0	0	--	--	0	0
	Observed behavior	1	0	--	--	0	0
Random		185	0	--	--	55	1
Follow-up		13	1	--	--	0	0
Other		4	0	--	--	9	0
Total		229	1	--	--	258	2

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

Consumers Power Company		December 31, 1994	
Company		8 Months Ending	
Big Rock Point Nuclear Plant			
Location			
Judith A Smith		(517) 788-7072	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	/	Amphetamines	/
Cocaine	/	Phencyclidine	/
Opiates	/	Alcohol (% BAC)	/
Any detectable for situations other than random			

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		222		N/A		22	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		4	0	--	--	49	2
For Cause	Post accident	0	0	--	--	0	0
	Observed behavior	0	0	--	--	0	0
Random		69	0	--	--	11	0
Follow-up		0	0	--	--	0	0
Other		1	0	--	--	1	0
Total		74	0	--	--	61	2

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

Consumers Power Company		December 31, 1994
Company		6 Months Ending
Support Locations		
Location		
Judith A Smith		(517) 788-7072
Contact Name		Phone (include area code)
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR 26		
Marijuana	/	Amphetamines                      /                      _____ /
Cocaine	/	Phencyclidine                      /                      _____ /
Opiates	/	Alcohol (% BAC)    Any detectable for situations other than random                      /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		270		N/A		24	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		16	0	--	--	0	0
For Cause	Post accident	0	0	--	--	0	0
	Observed behavior	0	0	--	--	0	0
Random		81	0	--	--	2	0
Follow-up		7	0	--	--	0	0
Other		7	0	--	--	0	0
Total		111	0	--	--	2	0

**REV. 1/92**