



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

Report Nos.: 50-424/91-17 and 50-425/91-17

Licensee: Georgia Power Company
P. O. Box 1295
Birmingham, AL 35201

Docket Nos.: 50-424 and 50-425

License Nos.: NPF-68 and NPF-81

Facility Name: Vogtle 1 and 2

Inspection Conducted: July 8-9, 1991

Inspector: *D. Thompson*
D. Thompson, Safeguards Inspector

8/8/91
Date Signed

Approved by: *D. R. McGuire*
D. R. McGuire, Chief
Safeguards Section
Nuclear Material Safety and Safeguards Branch
Division of Radiation Safety and Safeguards

8/8/91
Date Signed

SUMMARY

Scope:

This special, announced inspection was conducted in the area of the licensee's Fitness-for-Duty (FFD) Program as required by 10 CFR Part 26. Specifically, the licensee's Written Policy and Procedures, Program Responsibilities, Training and Key Program Processes were reviewed using NRC Temporary Instruction 2515/106, "Fitness for Duty - Initial Inspection of Implemented Program," dated July 11, 1990.

Results:

In the areas inspected, violations were not identified. Based upon the NRC's selective examination of key elements it was concluded that the licensee is satisfying the general performance objectives of Part 26. Several strengths were noted in the licensee's FFD Program; FFD Training, FFD staff's knowledge of the program, and the professionalism of the collection technicians and the collection facility.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *V. Agro, (Site) Administration Supervisor, Vogtle Nuclear Plant
- *P. Bzjak, (Corporate) Supervisor Occupational Health and Employee Assistance
- *T. Greiner, (Site) Plant Nurse
- *T. Harrison, (Site) Fitness-for-Duty Coordinator
- *M. Kurtzman, (Site) Supervisor Health Physics/Chemical Training
- B. Rooks, (Site) Plant Nurse
- *W. Shipman, (Site) Plant General Manager
- *B. Woods, (Site) Health Services Technician

Other licensee employees contacted during this inspection included craftsmen, operators, mechanics, technicians, and administrative personnel.

NRC Resident Inspectors

- *P. Balmain, Resident Inspector
- R. Starkey, Resident Inspector

*Attended exit interview

2. Licensee's Written Policy and Procedures

Prior to 10 CFR Part 26 the licensee had a Fitness-for-Duty (FFD) policy (1984) which included drug testing for pre-employment, and discretionary testing. In 1988, the licensee changed their program to include random testing. Currently, Corporate Policy No. 720, titled "Fitness-for-Duty," Revision 0, dated February 22, 1991, is a four-page statement of the licensee's FFD "Policy" and "Implementation" requirements, signed by the President, Southern Nuclear Operating Company. Corporate Guideline Policy No. 720-001, effective January 1, 1991, Revised May 16, 1991, addressed all the criteria identified in Part 26, and is signed by the Vice President, Administrative Services, Southern Nuclear Operating Company.

Vogtle procedure VNS-AP-46, "Fitness-for-Duty Program," dated August 29, 1990, is the site implementation document, which details responsibilities of the Vice President-Nuclear, Managers and Supervisors, Manager Nuclear Administration, Supervisor Administration Support, Safety Audit and Engineering Review, Safety and Health SONOPCO Project Corporate Security, Southern Company Services-Technical Services/Corporate Quality Services, and Employees. The procedure was further supported by a Plant Vogtle "Fitness-for-Duty Policy."

The licensee's procedures are detailed and provide adequate information to each person participating in the FFD program.

3. Program Administration

a. Management Responsibilities

The licensee's Corporate Supervisor Occupational Health and Employee Assistance is the singular authority who administers the FFD program. He reports to the Corporate Manager Safety and Health, who reports to the General Manager-Human Resources.

b. Resource Allocation

Adequate resources were available to fully support the FFD program. The registered nurses, laboratory technicians and site managers all appeared sufficiently trained to perform their duties. It was noted that the laboratory technicians were very competent when performing the FFD duties.

c. Employee Assistance Program (EAP)

The licensee's EAP is designed to achieve early intervention of drug/alcohol abuse under a confidential assistance program. If the employee poses a threat to self or to the facility the program is designed to allow the notification of management so that access to the protected area can be avoided.

Employees who self-refer or are detected as a result of the random drug/alcohol program are counselled by qualified counselors, and should the employee need expanded counselling, the licensee has provided service with professional agencies who deal with drug/alcohol problems. EAP reports are reviewed by the Medical Director who in concert with management can reinstate an employee under a follow-up testing program.

4. Training

a. Policy Communication

Two booklets titled "Fitness-for-Duty" and "Guide to Effective Behavioral Observation and Follow-up Actions," were furnished to attendees at the FFD training sessions. It was noted during this inspection, through a limited sampling of employees and contractors, that they were knowledgeable of the FFD program and their responsibilities. However, although the licensee provides a FFD program hand-out, some of the employees during interviews did not recall being provided a hand-out.

During interviews with supervisors, licensee employees, and contractors, the inspector found that they were very knowledgeable of

the contents being presented during annual training. The inspector reviewed the film and found it to be well done and provided a very good training aid for supervisors or employees to recognize aberrant behavior and the actions to take in the event a co-worker demonstrates an aberrant behavior trait.

b. Chemical Testing

At the Vogtle Nuclear Plant the licensee averages testing seven candidates per day.

During the calendar year 1990 the licensee tested 102.9 percent of Vogtle Nuclear Plant population which was approximately 1,835 individuals. Random tests were as follows:

| <u>Licensee</u> | |
|-----------------|-----|
| Once | 748 |
| Twice | 315 |
| Three Times | 105 |
| Four Times | 25 |
| Five Times | 6 |
| Six Times | 4 |

As of the inspection for 1991 the random test were as follows:

| <u>Licensee</u> | |
|-----------------|-----|
| Once | 330 |
| Twice | 149 |
| Three Times | 3 |
| Four Times | 4 |

The inspector toured the site collection and laboratory facility which is onsite, exterior to the protected area, within the site's Medical Facility. It appeared that adequate floor space, office equipment, storage facilities, collection facility and laboratory equipment have been allocated for the collection and testing of specimens.

The inspector observed collection and testing of specimens and noted that the personnel were friendly, professional and adequately trained to perform their assigned duties. Each person interviewed considered the collection facility adequate and staffed with professional personnel.

c. Sanctions and Appeals

Terminations result from a second confirmed drug or alcohol test. Should an individual choose to appeal, he/she must provide a written

explanation within three days of his/her removal from duty. The appeal will be forwarded to the Executive Vice President-Nuclear.

d. Audit

The licensee completed an audit of Smithkline Beecham Clinical Laboratories on May 23, 1991. There were no findings noted during this inspection. A QA audit of the Fitness-for-Duty Administrative Controls and Reporting Requirements, dated May 16, 1991, was conducted. There was one deficiency noted during this audit. The Southern Nuclear Operating Company Audit of the Fitness-for-Duty Program, dated May 3, 1991, resulted in three audit findings, five comments, and eight areas for further evaluation by Safety and Health. The manager of the FFD program was addressing the findings.

5. Key Program Processes

Each Friday, a random generator at the Corporate Office identifies a primary list and an alternate list of candidates for random drug testing for the following week. These lists are drawn from a population pool based on the employee identified number and the site unescorted access badge system. Corporate notifies the site FFD coordinator of the candidates.

Based upon interviews of employees/contractors/supervisors (six individuals), they stated that they believed that drug/alcohol testing did not take place on weekends, at night and on holidays. However, the inspector noted that during the period January - June 1991, the licensee had observed three holidays, and that collection occurred on two of those holidays. Additionally, collections were made on seven weekend days and four nights, for an average of at least one weekend a month. There were approximately 74 collections made between 6:00 p.m. and 7:00 a.m. The licensee's auditors had noted that there was limited testing between 11:00 p.m. and 1:00 a.m., and considered this time frame a possible safe period. In response to the audit finding, the licensee intended to test more personnel during this time frame.

6. Exit Interview

The inspection scope and results were summarized on July 9, 1991, with those persons indicated in paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed below. Dissenting comments were not received from the licensee. The licensee was complemented on the many strengths noted during their FFD program, i.e., FFD staff, collection facility, training and professionalism of the collection staff.

Georgia Power Company

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