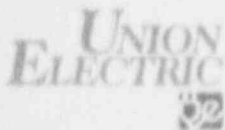


February 21, 1992  
ULNRC - 2567



U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Mail Station P1-137  
Washington, DC 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, 1991 and ending on December 31, 1991.

Enclosures include:

- Attachment A - Fitness For Duty Program Performance Data  
Personnel Subject to 10CFR26
- Attachment B - Random Testing Program Results/Confirmed Positives  
Tests for Specific Substances (Five Year Record)
- Attachment C - Fitness For Duty Management Action 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)676-8246.

A handwritten signature in cursive script that reads "James R. Peavy".

James R. Peavy  
Manager, Operations Support  
(Fitness For Duty Manager)

*RGR*

JRP/RGR/DMK/bb

9202280260 920221  
PDR ADOCK 05000483  
R PDR

A021

cc: A. Bert Davis, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

R. L. Hague  
Chief, Project Section 3C  
U. S. Nuclear Regulatory Commission  
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B. L. Bartlett/D. R. Calhoun  
Resident NRC Inspector, Callaway Plant  
Callaway Resident Office  
U. S. Nuclear Regulatory Commission  
RR #1  
Steedman, MO 65077

L. R. Wharton  
Licensing Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop 13-E-21  
Washington, DC 20555

(2 copies)

Shaw, Pittman, Potts, & Trowbridge  
2300 N. Street, N.W.  
Washington, DC 20037

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

UNION ELECTRIC COMPANY	December 31, 1991
<small>Company</small>	<small>6 Months Ending</small>
CALLAWAY 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 Results	Licensee Employees				Long Term Contractor Personnel		Short Term Contractor Personnel	
	1024		#		231		20	
Average Number with Unescorted Access			# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Categories	# Tested	# Positive	# Referred to EAP	# Access Restored	# Tested	# Positive	# Tested	# Positive
Pre-employment	22	0			0	0	0	0
Pre-badging	18	0			24	0	32	0
Periodic	0	0			0	0	0	0
For cause	0	0			0	0	0	0
Post accident	0	0			0	0	0	0
Random	509	0			125	0/1	12	0
Follow-up	2	0			0	0	0	0
Other	2	0			0	0	0	0
Total	553	0			149	1	44	0

# Random Testing Program Results

Individuals Tested	1989		1990		1991		1992		1993	
# Positive	0		4		1		1		1	
# Tested	654		840		640		646		646	
% Positive	0		.47%		.15%		.15%		.15%	
Graph of % Positive	5		4		3		2		1	

## Confirmed Positive Tests for Specific Substances

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

## Fitness For Duty Management Action

### Initiatives Taken

Initiatives taken during this reporting period have been minor in nature. Program changes implemented were to gain efficiency in the FFD Program and/or to correct weaknesses identified in the program. These initiatives taken were a result of Quality Assurance Audits/Surveillances and areas that were self-identified by FFD Program Administration.

### Lessons Learned

In comparing the random selection program for years 1990 and 1991, we have learned the program is operating in a consistent manner.

<u>Individuals Randomly Screened</u>	<u>TOTALS</u>		<u>% of Individuals Randomly Selected</u>		<u>% of Individuals Projected to Randomly Screen (Annually)</u>
	<u>1990 / 1991</u>		<u>1990 / 1991</u>		
Screened Zero	486	455	32.53	35.38	36.8
Screened Once	659	504	44.11	39.19	36.8
Screened Twice	243	207	16.27	16.10	18.4
Screened Three Times	82	74	5.49	5.75	6.1
Screened Four Times	18	30	1.20	2.33	1.5
Screened Five Times	5	4	.33	.31	.3
Screened Six Times	1	1	.07	.08	.0
Cumulative Average Population =	<u>1990 / 1991</u> 1477   1275		Random Tests Conducted =		<u>1990 / 1991</u> 1494   1286

In reviewing NRC Inspection reports of other utility's FFD programs has helped Union Electric to identify areas of strengths and weaknesses in our program. One specific area of note in which Union Electric implemented action as a direct result of these reviews was to accelerate weekend/holiday testing and focus on void time slots during backshifts when testing was not being performed

In attending the FFD seminar last October in Houston, Texas, it was suprising to learn the confusion that still exists from utility to utility on the implementation/interpretation of 10CFR26.

However, in exchanging information with other utilities at the seminar and in review of NRC (1991) inspection reports of other utility's FFD Programs, has provided Union Electric with data that may initiate additional changes during 1992 to enhance our current program and ensure full compliance with 10CFR26.

### Events Reported In Accordance With 10CFR26.73

No events occurred during this reporting period requiring reporting in accordance with 10CFR26.73.