

PHILADELPHIA ELECTRIC COMPANY  
 NUCLEAR GROUP HEADQUARTERS  
 955-65 CHESTERBROOK BLVD.  
 WAYNE, PA 19087-5691  
 (215) 640-6000

February 28, 1992

NUCLEAR ENGINEERING & SERVICES DEPARTMENT

Docket Nos. 50-277  
 50-278  
 50-352  
 50-353

License Nos. DPR-44  
 DPR-56  
 NPF-39  
 NPF-85

U.S. Nuclear Regulatory Commission  
 Attn: Document Control Desk  
 Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3  
 Limerick Generating Station, Units 1 and 2  
 Fitness-for-Duty Program Performance Data for  
 the Period July 1991 through December 1991

Dear Sir:

As required by 10 CFR 26.71(d), this letter submits the performance data for our Fitness-for-Duty program for the period July 1991 through December 1991. The data for our Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2, sites are provided in Attachments 1 and 2. Data for our Corporate Office and Nuclear Group Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA and 955-65 Chesterbrook Boulevard, Wayne, PA respectively) are also provided in Attachment 3.

The data are reported on a form acceptable to the NRC as documented in the July 31, 1989 letter from J. M. Taylor (NRC) to J. F. Colvin (Nuclear Management and Resources Council), and include the following.

- Drugs tested for and cut-off levels, including tests for other drugs (i.e., barbiturates and benzodiazepines).
- Workforce population tested.
- Numbers of tests and results by population and type of test (i.e, pre-badging, random, for-cause,

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pre-employment, periodic, post-accident, follow-up, and other types of tests.)

- Substances identified.

Attachments 1, 2, and 3 also include the following.

- Summary of management actions.
- Analysis of the data and appropriate actions that have been or will be taken.
- Random testing rate.

Note that there were no events that were reportable in accordance with 10CFR26.73 during this period.

Note also that the "Initiatives Taken" at our Corporate Office and Nuclear Group Headquarters (Attachment 3) describe the results of drug sweeps conducted between the period January 1991 through December 1991 since the results for the period January 1991 through June 1991 were not available at the time of our last periodic report submitted on August 27, 1991.

If you have any questions or require additional information, please contact us.

Very truly yours,



G. J. Beck, Manager  
Licensing Section

Attachment or Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC w/attachments  
J. J. Lyash, USNRC Senior Resident Inspector, PBI/RS w/attachments  
T. J. Kenny, USNRC Senior Resident Inspector, LGS w/attachments

## FITNESS FOR DUTY PROGRAM

Performance Data  
Personnel Subject to 10CFR 26

Philadelphia Electric Company

December 31, 1991

COMPANY

6 MONTHS ENDING

Peach Bottom Atomic Power Station

LOCATION

D. M. Sarley

(215) 841-5703

CONTACT NAME

PHONE (INCLUDE AREA CODE)

CUTOFFS: SCREEN/CONFIRMATION (ng/ml)  APPENDIX A TO 10CFR 26

MARIJUANA	100 / 15	AMPHETAMINES	1000 / 500	<u>Barbiturates</u>	300 / 300
COCAINE	300 / 15	PHENCYCLIDINE	25 / 25	<u>Benzodiazepines</u>	300 / 300
OPIATES	300 / 300	ALCOHOL (% BAC)	0.04 % BAC		/

TESTING RESULTS	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	2926 *						2433 *	
PRE-EMPLOYMENT	22	0					1450	10
PRE-BADGING	0	0					0	0
PERIODIC	17	0					0	0
FOR CAUSE	1	0					5	0
POST ACCIDENT	0	0					0	0
RANDOM	577	3					569	4
FOLLOW-UP	18	1					0	0
OTHER	11	0					19	0
TOTAL	646	4	4	2			2043	14

\* Includes individuals with dual-site access at PBAPS &amp; LGS.

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**RANDOM TESTING PROGRAM RESULTS**

INDIVIDUALS TESTED	1989		1990		1991		1992	1993						
	# POSITIVE	# TESTED	# POSITIVE	# TESTED	# POSITIVE	# TESTED								
% POSITIVE	14	1159	10	1371	5	1307	1	1155	5	1670	7	1146		
		1.21 %		0.73 %		0.38 %		0.09 %		0.30 %		0.61 %		
GRAPH OF % POSITIVE	5		4		3		2		1		1		1	
	1		1		1		1		1		1		1	

**CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

	1989	1990	1991	1992	1993	
MARIJUANA	15	7	1	8	12	4
COCAINE	11	9	5	5	4	8
OPATES	0	0	1	0	3	0
AMPHETAMINES	1	2	1	1	1	0
PHENCYCLIDINE	1	0	0	0	0	2
ALCOHOL	0	0	2	1	3	2
BARBITURATES	1	0	0	0	1	0
BENZODIAZEPINES	0	0	0	0	1	1

## ATTACHMENT 1

### Summary of Data Analysis and Management Actions Peach Bottom Atomic Power Station July - December 1991

#### I. Initiatives Taken

The following summarizes the results of sweeps conducted by Philadelphia Electric Company's (PECo's) drug sniffing canine teams at Peach Bottom Atomic Power Station (PBAPS) during this period.

- A. July 25, 1991 - Random team search of vehicles entering the Protected Area (PA). Results: No activations.
- B. August 20, 1991 - For-cause team search of a private vehicle. Results: Multiple activations. Investigation verified off site drug involvement. Plant access revoked.
- C. August 20, 1991 - For-cause team search of a private vehicle. Results: Multiple activations. Investigation verified previous drug related arrest. Plant access revoked.
- D. August 20, 1991 - For-cause search of a private vehicle. Results: No activations. Follow-up investigation substantiated abuse of prescription drugs and alcohol. Plant access revoked.
- E. September 26, 1991 - For-cause team search of a private vehicle. Results: Multiple activations. Search resulted in discovery of .17 grams of cocaine and alcoholic beverages. One individual arrested for possession of drugs. Plant access revoked for both individuals.
- F. October 10, 1991 - Random team sweep of shop areas outside the PA. Results: Twenty-seven activations. No drugs found or forensic samples taken.
- G. October 28, 1991 - For-cause team search of a private vehicle. Results: Multiple activations. No drugs found or forensic samples taken. Referral to Employee Assistance Program. Plant access revoked.
- H. November 1, 1991 - Random team sweep of the Modification Building, Contractor Break Room and the Health Physics (ALARA) Office. Results: Twenty-two activations. No drugs found or forensic samples taken.
- I. November 9, 1991 - For-cause team search of a private vehicle. Results: Two activations. No drugs found or forensic samples taken.



J. November 27, 1991 - Random team sweep of the drug testing area. Results: Eight activations. No drugs found or forensic samples taken.

## II. Management Actions

During the period, four PECO employees tested positive at PBAPS. Three of the employees tested positive as a result of random testing and the fourth was the result of a follow-up test based upon a history of previous substance abuse. Of the four employees, two have had their unescorted access restored. Unescorted access has not been restored for the other two pending further disciplinary action.

During this time period, ten contractors tested positive on their pre-employment tests. Additionally, four other contractors tested positive on random tests. In accordance with PECO's Fitness-for-Duty (FFD) Specification for Contractors, unescorted access was denied for the ten contractors testing positive on the pre-employment tests. Unescorted access was terminated for those four contractors testing positive through the random testing process.

## III. Events Reported Under 10CFR26.73

There were no events reported to the NRC under 10CFR26.73 during the period July - December 1991.

## IV. Nuclear Quality Assurance Audit

During the period a performance based audit of the Fitness-for-Duty program was performed to assess the adequacy of the program's implementation.

Two Corrective Action Requests (CARs) were issued as a result of this audit. One concerned the format used to report test results from the Department of Health and Human Services (DHHS)-certified laboratory. Immediate corrective action was taken and the CAR was issued "closed." The second CAR addressed deficiencies in the laboratory procedures used by the contractor performing on-site testing. Corrective action has been completed on this issue.

Additionally, eight recommendations were issued. The most significant recommendation addressed the issue surrounding management actions on presumptive positive test results. It was recommended that a review of PECO procedures carefully consider the evolving regulatory requirements. On August 26, 1991 the NRC amended 10 CFR Part 26 to permit temporary suspension of unescorted access for individuals based upon an unconfirmed positive result for marijuana or cocaine provided certain conditions are met. PECO's FFD Steering Committee is continuing to evaluate this change.

Overall, the auditors found the FFD Program to be adequate and effectively implemented.

V. Random Testing Rate

PECo conducts random testing at the annualized rate of 100%. The "average number with unescorted access" includes personnel badged at both PBAPS and Limerick Generating Station. PECO maintains separate testing "pools" for employees and contractors.

VI. Additional Information

During the period the contract for PECO's on-site testing was re-evaluated and subsequently re-bid. A new contract has been awarded to the laboratory that is performing our confirmatory process, i.e., DrugScan, Inc., to perform testing at the site.

**FITNESS FOR DUTY PROGRAM**

# Performance Data Personnel Subject to 10CFR 26

Philadelphia Electric Company

COMPANY

Limerick Generating Station

LOCATION

D. M. Sarley

CONTACT NAME

December 31, 1991

6 MONTHS ENDING

(215) 841-5703

PHONE (INCLUDE AREA CODE)

CUTOFFS: SCREEN/CONFIRMATION (ng/ml)  APPENDIX A TO 10CFR 26

MARIJUANA	100 / 15	AMPHETAMINES	1000 / 500	<u>Barbiturates</u>	300/300
COCAINE	300 / 15	PHENCYCLIDINE	25 / 25	<u>Benzodiazepines</u>	300/300
OPIATES	300 / 300	ALCOHOL (% BAC)	0.04 % BAC		/

TESTING RESULTS	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	2926 *						2433 *	
PRE-EMPLOYMENT	41	0					301	5
PRE-BADGING	25	0					0	0
PERIODIC	3	0					0	0
FOR CAUSE	6	1					5	2
POST ACCIDENT	4	0					1	0
RANDOM	433	1					362	2
FOLLOW-UP	19	0					0	0
OTHER	6	0					1	0
TOTAL	537	2	2	1			670	9

\* Includes individuals with dual-site access at PBAPS & LGS.



**RANDOM TESTING PROGRAM RESULTS**

INDIVIDUALS TESTED	1989		1990		1991		1992		1993	
# POSITIVE	15	13	4	2	5	3				
# TESTED	2062	1646	1249	1037	1350	795				
% POSITIVE	0.73 %	0.79 %	0.32 %	0.19 %	0.40 %	0.38 %				
GRAPH OF % POSITIVE										

**CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

MARIJUANA	38	8	5	11	7	1				
COCAINE	43	14	2	12	8	4				
OPIATES	2	1	1	0	0	0				
AMPHETAMINES	5	0	0	1	0	0				
PHENCYCLIDINE	0	0	0	0	0	0				
ALCOHOL	0	0	1	1	4	5				
BARBITURATES	0	0	1	0	0	0				
BENZODIAZEPINES	4	0	0	2	0	1				

## ATTACHMENT 2

### Summary of Data Analysis and Management Actions Limerick Generating Station July - December 1991

#### I. Initiatives Taken

The following summarizes the results of sweeps conducted by Philadelphia Electric Company's (PECo's) drug sniffing canine teams at Limerick Generating Station (LGS) during this period.

- A. July 22, 1991 - Random team search of vehicles entering the Protected Area (PA). Results: Four activations. No drugs found or forensic samples taken. One vehicle denied access due to a violation of the Alcohol Policy.
- B. August 2, 1991 - Random team sweep of the contractor storage building. Results: Seven activations. No drugs found except for a bonafide prescription drug. No forensic samples taken.
- C. August 15, 1991 - For-cause team search of a private vehicle. Results: Seven activations. No drugs found or forensic samples taken. Investigation verified previous off site drug involvement. Plant access revoked.
- D. August 20, 1991 - For-cause team search of a private vehicle. Results: Five activations. No drugs found or forensic samples taken. Investigation verified previous and recent drug use off site. Container of alcohol also discovered. Plant access revoked.
- E. September 12, 1991 - Random team sweep of employee parking lot. Results: Four activations. No drugs found or forensic samples taken.
- F. September 12, 1991 - For-cause team search of a private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- G. September 12, 1991 - For-cause team search of another private vehicle. Results: Two activations. No drugs found or forensic samples taken.
- H. October 7, 1991 - For-cause team search of another private vehicle. Results: Two activations. No drugs found or forensic samples taken. Investigation verified previous and recent drug use off site. Plant access revoked.

- I. October 23, 1991 - Random team sweep of contractor trailers inside the PA, two vehicles and the second floor Site Services Building. Results: One activation. No drugs found or forensic samples taken.
- J. November 4, 1991 - Special request by an employee to search a recently purchased used vehicle prior to bringing it onto Company property. Results: No activations.
- K. November 18, 1991 - For-cause (Security Recheck' team search of an employee's vehicle at another company location. Results: One activation. Drug paraphernalia with cocaine residue confiscated. Police contacted and employee arrested. Plant access revoked. \*Employee not assigned to Limerick.
- L. December 2, 1991 - Random team sweep of the drug testing offices in the Personnel Processing Center. Results: Two activations. No drugs found or forensic samples taken.
- M. December 17, 1991 - Random team sweep of the four floors of the Site Services and Kemper Buildings. Results: Two activations. No drugs found or forensic samples taken.

## II. Management Actions

During the period, two PECO employees tested positive for alcohol at LGS. One was in response to a for-cause test and credible allegations regarding the individual. The second was a random test. Both were referred for treatment and to the Employee Assistance Program (EAP) for assessment and evaluation. The individual who was tested for-cause has returned to work but his unescorted access has not be reinstated. The individual who tested positive on the random test has subsequently returned to work with unescorted access reinstated, but remains in the follow-up program.

During the period, nine contractors tested positive; five positives on pre-employment, two positives as a result of for-cause testing, and two as a result of random testing. In accordance with PECO's Fitness-for-Duty (FFD) Specification for Contractors, unescorted access was denied for the five contractors testing positive as a result of their pre-employment tests and unescorted access was terminated for the four other contractors.

## III. Events Reported Under 10CFR26.73

There were no events reported to the NRC under 10CFR26.73 during the period of July - December 1991.

IV. Nuclear Quality Assurance Audit

During the period a performance based audit of the Fitness-for-Duty program was performed to assess the adequacy of the program's implementation.

Two Corrective Action Requests (CARs) were issued as a result of this audit. One concerned the format used to report test results from the Department of Health and Human Services (DHHS)-certified laboratory. Immediate corrective action was taken and the CAR was issued "closed." The second CAR addressed deficiencies in the laboratory procedures used by the contractor performing on-site testing. Corrective action has been completed on this issue.

Additionally, eight recommendations were issued. The most significant recommendation addressed an issue surrounding management actions on presumptive positive test results. It was recommended that a review of PECO procedures carefully consider the evolving regulatory requirements. On August 26, 1991 the NRC amended 10 CFR Part 26 to permit temporary suspension of unescorted access for individuals based upon an unconfirmed positive result for marijuana or cocaine provided certain conditions are met. PECO's FFD Steering Committee is continuing to evaluate this change.

Overall, the auditors found the FFD Program to be adequate and effectively implemented.

V. Random Testing Rate

PECO conducts random tests at the annualized rate of 100%. The "average number with unescorted access" includes personnel badged at both LGS and Peach Bottom Atomic Power Station. PECO maintains separate testing "pools" for employees and contractors.

VI. Additional Information

During the period the contract for PECO's on-site testing was re-evaluated and subsequently re-bid. A new contract has been awarded to the laboratory that is performing our confirmatory process, i.e., DrugScan, Inc., to perform testing at the site.



## FITNESS FOR DUTY PROGRAM

Performance Data  
Personnel Subject to 10CFR 26

Philadelphia Electric Company

December 31, 1991

COMPANY

6 MONTHS ENDING

Corporate and Nuclear Headquarters

LOCATION

D. M. Sarley

(215) 841-5703

CONTACT NAME

PHONE (INCLUDE AREA CODE)

CUTOFFS: SCREEN/CONFIRMATION (ng/ml)  APPENDIX A TO 10CFR 26

MARIJUANA 100 / 15 AMPHETAMINES 1000 / 500

Barbiturates 300 / 300

COCAINE 300 / 15 PHENCYCLIDINE 25 / 25

Benzodiazepines 300 / 300

OPIATES 300 / 300 ALCOHOL (% BAC) 0.04 % BAC

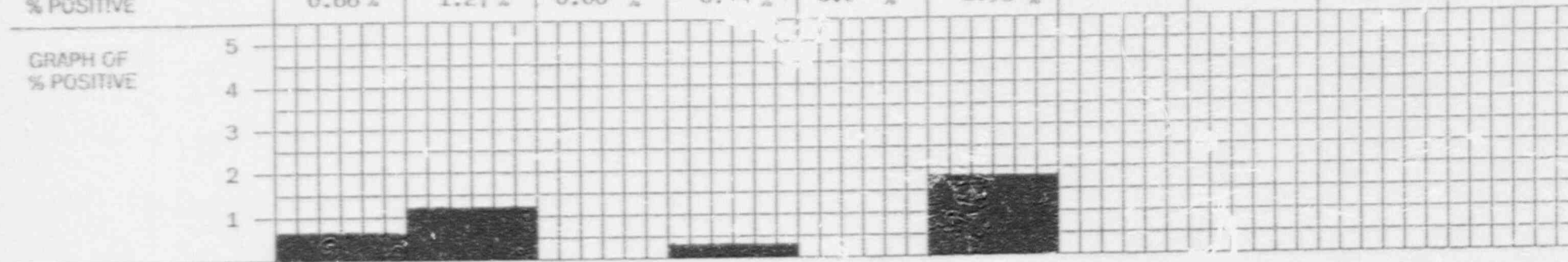
TESTING RESULTS	LICENSEE EMPLOYEES				LONG-TERM CONTRACTOR PERSONNEL		SHORT-TERM CONTRACTOR PERSONNEL	
	# TESTED	# POSITIVE	# REFERRED TO EAP	# ACCESS RESTORED	# TESTED	# POSITIVE	# TESTED	# POSITIVE
AVERAGE NUMBER WITH UNESCORTED ACCESS	2926 *						2433 *	
PRE-EMPLOYMENT	19	0					8	0
PRE-BADGING	12	0					0	0
PERIODIC	5	0					0	0
FOR CAUSE	5	0					0	0
POST ACCIDENT	1	0					1	0
RANDOM	194	4					13	0
FOLLOW-UP	22	2					0	0
OTHER	13	0					1	0
TOTAL	271	6	6	1			23	0

\* Includes Individuals with dual-site access at PRAPS &amp; IGS.

7/21/89

**RANDOM TESTING PROGRAM RESULTS**

INDIVIDUALS TESTED	1989		1990		1991		1992	1993
# POSITIVE	2	5	0	1	0	4		
# TESTED	303	395	253	2	279	207		
% POSITIVE	0.66 %	1.27 %	0.00 %	0.50 %	0.0 %	1.93 %		



**CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES**

MARUJANA	22	25	13	12	2	1			
COCAINE	45	42	21	14	2	3			
OPIATES	2	7	0	1	0	0			
AMPHETAMINES	0	2	1	0	0	0			
PHENCYCLIDINE	0	0	0	0	0	1			
ALCOHOL	0	0	8	4	1	1			
BARBITURATES	2	0	0	0	0				
BENZODIAZEPINES	1	2	1	0	0	0			



## ATTACHMENT 3

### Summary of Data Analysis and Management Actions Corporate and Nuclear Group Headquarters July - December 1991

#### I. Initiatives Taken

##### Chesterbrook Facility

March 28, 1991 - Random team sweep of the 1st floor, 955 Building. Results: Thirty-seven activations. No drugs found or forensic samples taken.

July 29, 1991 - Random team sweep of 2nd floor, 965 Building. Results: Twenty activations. No drugs found or forensic samples taken.

##### Emergency Operations Facility

November 19, 1991 - Random team sweep of the new Emergency Operations Facility (EOF) (prior to PECO possession). Results: Two activations. No drugs found or forensic samples taken.

##### Main Office Building

October 1, 1991 - For-cause team search of 4th floor conference room, Emergency Telephone areas. Results: five activations. No drugs found or forensic samples taken.

November 7, 1991 - For-cause team response to substance found on the 3rd floor mezzanine, near the library. Results: Laboratory analysis reflected that the substance was not drug-related.

November 8, 1991 - For-cause team search of the 3rd floor Break Room, near the library. Results: A foreign substance found in a common area was determined to be .19 grams of marijuana.

#### II. Management Actions

During this period, six PECO employees tested positive at the Corporate and Nuclear Group Headquarters. Four tested positive as a result of random testing and two tested positive as a result of follow-up testing based on previous history of substance abuse. Of the the six individuals, employment has been terminated for one, unescorted access restored for one, and the other four remain excluded from unescorted access.

III. Events Reported Under 10CFR26.73

No events were reported to the NRC under 10CFR26.73 during the period.

IV. Nuclear Quality Assurance

During the period a performance based audit of the Fitness-for-Duty program was performed to assess the adequacy of the program's implementation.

Two Corrective Action Requests (CARs) were issued as a result of this audit. One concerned the format used to report test results from the Department of Health and Human Services (DHHS)-certified laboratory. Immediate corrective action was taken and the CAR was issued "closed." The second CAR addressed deficiencies in the laboratory procedures used by the contractor performing on-site testing.

Additionally, eight recommendations were issued. The most significant recommendation addressed the issue surrounding management actions on presumptive positive test results. It was recommended that a review of PECO procedures carefully consider the evolving regulatory requirements. On August 26, 1991, the NRC amended 10 CFR Part 26 to permit temporary suspension of unescorted access for individuals based upon an unconfirmed positive result for marijuana or cocaine provided certain conditions are met. PECO's FFD Steering Committee is continuing to evaluate this change.

Overall, the auditors found the FFD Program to be adequate and effectively implemented.

V. Random Testing Rate

PECO conducts random tests at the annualized rate of 100%. The "average number with unescorted access" includes personnel badged at both Limerick Generating Station and Peach Bottom Atomic Power Station. PECO maintains separate testing "pools" for employees and contractors.