

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 50-382/84-47

Construction Permit: CPPR-103

Docket: 50-382

Licensee: Louisiana Power & Light Company (LP&L)  
142 Delaronde Street  
New Orleans, Louisiana 70174

Facility Name: Waterford Steam Electric Station, Unit 3

Inspection At: Taft, Louisiana

Inspection Conducted: December 10-13, 1984

Participating  
Personnel:

E. H. Johnson

E. H. Johnson, Chief, Reactor Project Branch I

2/1/85

Date

J. A. F. Kelly

J. A. F. Kelly, Physical Security Inspector, RIV

3 Feb 85

Date

F. J. Long

F. J. Long, Technical Assistant to the Regional  
Administrator, RII

3/15/85

Date

William J. Tobin

W. J. Tobin, Senior Security Inspector, RII

2/15/85

Date

Thomas G. Ryan

Dr. T. G. Ryan, Human Factors and Safeguards  
Research Branch, RES

2/22/85

Date

Inspection Summary

Inspection Conducted December 10-13, 1984 (Report 50-382/84-47)

Areas Inspected: Routine, unannounced inspection of the licensee's fitness for duty program. The inspection involved 89 manhours by the NRC staff.

Results: No violations or deviations were identified. It was determined that the licensee's fitness for duty program was acceptable when compared to currently available guidelines, and above average in most categories when compared to a sampling of other nuclear plants.

DETAILS

1. Persons Contacted

Principal Licensee Employees

- \*S. Leddick, Senior Vice President, Nuclear Operations
- \*R. P. Barkhurst, Plant Manager
- \*F. J. Englebracht, Plant Administrative Manager
- W. J. Friloux, Corporate Security Manager
- R. W. Lailheugue, Plant Security Superintendent
- \*J. Sleger, Executive Assistant to the Senior Vice President of Nuclear Operations
- L. F. Storz, Assistant Plant Manager, Operations and Maintenance
- F. E. Tate, Ed.D., Senior Consultant, Rohrer, Hibler, Replogle-Consultant to LP&L

\*Attended exit interview on December 13, 1984.

In addition to the above, interviews were conducted with 17 plant supervisors.

2. Purpose of the Inspections

The purpose of this inspection was to review the licensee's fitness for duty program, both in content and implementation, in order to ensure that the program would enable detection of impacted behavior. The inspection was necessary to resolve NRC concerns in this area to enable a timely licensing decision to be made.

3. Method of Inspection

The inspection was conducted by reviewing the directives and procedures which describe the program elements, inspection of selected personnel files, lesson plans for some of the required training, interviews of supervisors in each principal discipline, discussions with principal licensee staff charged with administering the program, and records and results of the activities of the security department in preventing or detecting the use of contraband material on the site.

The elements and method of implementation of a fitness for duty program are not prescribed by NRC regulation. Guidelines for acceptable programs are in place in the military and in other industries, and have been outlined for adoption within the nuclear utility industry by NUMARC, a committee of senior utility executives which makes industry-wide policy. The NRC inspection team included staff experts in the examination and evaluation of fitness for duty programs who were familiar with the nuclear industry guidelines as well as the specifics of fitness for duty programs at a variety of nuclear power plants.

4. Fitness for Duty Program Elements

The LP&L fitness for duty program consists of the following elements:

- a. Personnel Screening - Prospective employees undergo a background investigation over the previous 5-year period. The background investigation includes a driving record check and citizenship verification. All new hires must undergo a physical examination which includes a urinalysis which is checked for 16 types of drugs. Each person requiring access to the protected area undergoes psychological screening (MMPI) and clinical interviews.
- b. Employee Assistance - A confidential employee assistance program is available to all LP&L personnel associated with the Waterford plant. This program includes the employee and family for any type of program that might impact performance. Since this program was started it has been used by over 70 employees or their family members for a variety of problems. The program is described in a number of pamphlets that are mailed to the employee at home. Referrals by supervisors or the clinical staff have also occurred.
- c. Alcohol/Drug Abuse Awareness - All LP&L nuclear department employees have participated in an alcohol/drug abuse awareness seminar.
- d. Minimum On-Duty Performance Requirements - The licensee has published a clear policy on the minimum on-duty requirements which is mandatory reading for all employees, who sign an acknowledgement statement. These requirements address, in a positive fashion, the question of off-duty use of illegal drugs or controlled substances. Prohibitions on illegal items on company property are published and advertised through numerous signs on the site.
- e. Behavioral Observation - All nuclear department supervisors have undergone a 2-day training program on how to observe their employees for indicators of impacted performance. Interviews with supervisors established that this was generally useful training. Plans for periodic retraining on this subject have been made by the licensee.
- f. Security Organization - The security organization also plays a strong role in the fitness for duty program. Prompt investigation, strong emphasis on prevention, and close cooperation with local law enforcement authorities were apparent. Unannounced searches of personnel, packages, and vehicles have resulted in numerous suspensions, terminations, seizures, and referrals to the local law enforcement agencies. These searches have included the use of drug dogs on occasion.

5. Findings

No violations or deviations were discovered during the inspection. The staff determined that the licensee had defined and implemented a fitness for duty program that meets general guidelines established and validated in other U.S. industries and the military over the past 25 years. The elements of the licensee's fitness for duty program are equal to or exceed those of other nuclear power plants when compared to a sampling of nuclear utilities.

Several elements that could be improved in the program were noted and discussed at the exit interview. These included policies and attendant procedures to ensure adequate coordination between utility and contractor supervision in monitoring the behavior of the total on-site population. Also discussed was the necessity to collect adequate data on the successes or failures of the program in order to provide a basis for assessing program effectiveness and for revisions where indicated.

6. Exit Interview

An exit interview was held with Mr. R. S. Leddick, Senior Vice President, Nuclear Operations, and other members of the plant staff on December 13, 1984. The scope of the inspection and the findings indicated above were discussed.