

099

RELATED CORRESPONDENCE

MAY 20, 1985

UNITED STATES OF AMERICA

DOCKETED  
USNRC

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of

CAROLINA POWER & LIGHT COMPANY  
AND NORTH CAROLINA EASTERN  
MUNICIPAL POWER AGENCY

(Shearon Harris Nuclear Power Plant)

Docket No. 50-400 OL

OFFICE OF SECRETARY  
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BRANCH

APPLICANTS' ANSWERS TO CONSERVATION COUNCIL'S  
DISCOVERY REQUESTS TO APPLICANTS ON  
CONTENTION WB-3 (DRUG ABUSE DURING CONSTRUCTION)

Applicants Carolina Power & Light Company and North Carolina Eastern Municipal Power Agency, pursuant to 10 C.F.R. §2.740b, hereby submit the following responses to "Discovery Requests to Applicants on Contention WB-3 (Drug Abuse During Construction)." The provision of answers to these interrogatories is not to be deemed a representation that Applicants consider the information sought to be relevant to the issues to be heard in this proceeding.

ANSWERS TO GENERAL INTERROGATORIES

INTERROGATORY NO. 1-WB. State the name, present or last known address, and present or last known employer of each person known to the Applicants to have first-hand knowledge on which the responses to the specific interrogatories are based.

ANSWER: Applicants assume this question to mean those persons with "first-hand knowledge" of the specific responses as herein provided and, as such, the answer to this interrogatory is contained in ATTACHMENT A attached hereto.

INTERROGATORY NO. 2-WB. Identify those facts concerning which each person identified in the response to 1-WB has knowledge.

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ANSWER: The answer to this interrogatory is contained in ATTACHMENT A attached hereto.

INTERROGATORY NO. 3-WB. State the specific basis or facts which support each response.

ANSWER: The specific basis or facts supporting each response are indicated in the answers to each specific interrogatory.

INTERROGATORY NO. 4-WB. State the name, present or last known address, and present or last employer of each person who provided information upon which the Applicants relied in answering [sic] each interrogatory herein.

ANSWER: The answer to this interrogatory is contained in ATTACHMENT A attached hereto.

INTERROGATORY NO. 5-WB. Identify all such information which was provided by each such person and the specific interrogatory response in which such information is contained.

ANSWER: The answer to this interrogatory is contained in ATTACHMENT A attached hereto.

INTERROGATORY NO. 6-WB. State the name, address, title, employer and educational and professional qualifications of each person the Applicants intend to call as an expert or other witness at a hearing on this contention.

ANSWER: Applicants do not know at this time which, if any, expert or other witnesses they expect to call relating to this contention.

INTERROGATORY NO. 7-WB. State the subject matter to which each person identified in 6-WB is expected to testify.

ANSWER: See answer to Interrogatory No. 6-WB above.

INTERROGATORY NO. 8-WB. Identify all documents in Applicants' possession, custody, or control, including all relevant page citations, pertaining to the subject matter of this contention and upon which Applicants relied upon in formulating responses to these interrogatories.

ANSWER: Documents in Applicants' possession, custody, or control upon which Applicants relied in formulating responses to these interrogatories and which are identified in said responses will be made available to a representative of the

Conservation Council of North Carolina for inspection and copying at the corporate offices of Carolina Power & Light Company, 411 Fayetteville Street Mall, Raleigh, NC. The documents will be made available during CP&L's business hours. Appointments to inspect the documents may be arranged by telephoning Andrew McDaniel (CP&L Associate General Counsel) at (919) 836-6513. Inspected documents which the Council wishes to have copied will be reproduced by CP&L on a schedule compatible with other demands for duplicating equipment. A CP&L employee will be made available during the inspection to receive any requests for copying. Copies of any such documents will then be furnished to the Council upon payment of 7 cents per page to meet CP&L's cost of reproduction.

INTERROGATORY NO. 9-WB. Identify all documents which Applicants indent [sic] to offer as exhibits at a hearing on this contention.

ANSWER: Applicants have not at this time identified which documents, if any, they intend to offer as exhibits at any hearing on this contention.

INTERROGATORY NO. 10-WB. State the name, present or last known address, and present or last known employer of each person referred to in any of the responses to these interrogatories, unless the interrogatory specifically allows names, et al., not to be given.

ANSWER: See ATTACHMENT A.

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Shearon Harris Nuclear Power Plant  
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CP&L's Vice President - Harris Nuclear Project

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CP&L's Director - Employee Assistance Program

#### SPECIFIC INTERROGATORIES

INTERROGATORY NO. 11-WB. Do the Applicants admit to the veracity of the facts contained in the newspaper article titled "6 Arrested in Nuclear Plant Drug Probe," on page 1A of the Raleigh NEWS & OBSERVER, January 11, 1985, which was attached to the Conservation Council's Request for Admission [sic] of New Contention WB-3 (January 18, 1985)?

ANSWER: Information indicated in the referenced newspaper article appears to be an accurate reporting of statements made. However, Applicants do not have information to substantiate two statements attributed to Major T. W. Lanier of the Wake County Sheriff's Department.

INTERROGATORY NO. 12-WB. If the answer to 11-WB is negative, which portions of the article are in Applicants' opinion not true or otherwise misleading?

ANSWER: 1) Drug use at the plant was widespread, mainly involving cocaine.

2) About 100 of the 6,000 workers at the plant used drugs on the site.

INTERROGATORY NO. 13-WB. For each portion of the article described in 11-WB which Applicants do not admit to as true, please explain the basis for your assertion that that portion is not true or otherwise misleading?

ANSWER: Following a two-months investigation by professional law enforcement officers, including two undercover agents on-site, only six individuals were identified and arrested with two other individuals having warrants issued for their arrest. The individuals were charged with possession with intent to sell and deliver small amounts of drugs. Eight workers in possession of drugs, out of more than 6,000 workers at the site, does not constitute "widespread" use. Major Lanier's estimate that about 100 of the 6,000 workers used drugs at the site must be considered as an estimate without supportive evidence or basis.

INTERROGATORY NO. 14-WB. For each of the eight workers (which includes the six listed by name in the article and two more who had warrants issued for their arrest) identified in the article described in 11-WB, please describe the position each held at the Harris construction site, the length of their employment at the site, the specific jobs which each performed (in detail enough that the an [sic] NRC inspector could locate the actual area which the work was performed), who their supervisor were during the different times of their employment at the Harris site, the exact charges brought against each one, and whether the jobs each had performed were reinspected after their arrests.

ANSWER: WORKER #1:

Job Description: Electrician

Length of Employment: 20-1/2 months

Work Area/Performance: Fuel Handling Building;

installed non-safety related grounding, conduit, panels, cable tray supports, conduit support; and safety related boxes; elevations 236', 286', 305' and 324'

WORKER #2:

Job Description: Electrician  
Length of Employment: 15 months  
Work Area/Performance: Fuel Handling Building  
installed lighting raceways (non-safety related);  
elevation 236'

WORKER#3:

Job Description: Electrician  
Length of Employment: 9-1/2 months  
Work Area/Performance: Fuel Handling Building;  
installed safety related conduits, box hangers,  
cable tray, boxes; and non-safety related conduits,  
supports, raceways, cable tray; elevations 216', 236'  
and 261'

WORKER #4:

Job Description: Electrician  
Length of Employment: 8 months  
Work Area/Performance: Fuel Handling Building;  
pulling cables (non-safety related); elevations 216',  
236', 261', 286' and 305'

Waste Processing Building; pulling cable (non-  
safety related); elevations 236', 246', 276' and 291

Reactor Auxiliary Building; pulling cable (non-  
safety related); elevations 190', 286' and 305'

Emergency Service Water Intake Structure

Security Building

Also performed cable research

WORKER #5:

Job Description: Electrician  
Length of Employment: 6 months  
Work Area/Performance: Fuel Handling Building;  
pulling cables (non-safety related); elevations 216',  
236', 261', 286' and 305'

Waste Processing Building; pulling cable (non-  
safety related); elevations 236', 246', 276' and 291

Reactor Auxiliary Building; pulling cable (non-  
safety related); elevations 190', 286' and 305'

Emergency Service Water Intake Structures



Security Building

Also performed cable research

WORKER #6:

Job Description: Electrician

Length of Employment: 6 months

Work Area/Performance: Fuel Handling Building;  
install safety related conduits and non-safety  
related conduits and supports; elevation 261'

Reactor Containment Building; installing non-  
safety boxes and conduits

WORKER #7:

Job Description: Electrician

Length of Employment: 58 months

Work Area/Performance: Temporary electrical work  
throughout the Plant; trouble calls on tower, polar  
and gantry cranes; oxygen sensors in Reactor  
Containment Building and Fuel Handling Building;  
weld machine repair, lighting, cord repair, and  
electrical boards

WORKER #8:

Job Description: Pipe Hanger Fitter

Length of Employment 5 months

Work Area/Performance: Various buildings involving  
fit-up on pipe hangers

The above workers would have had numerous foremen, general foremen and supervisors during their different times of employment at the Harris site. Applicants have not undertaken an exhaustive search of the time cards relative to these workers to determine their foremen and supervisors.

The exact charges pending against the above workers are not specifically known by Applicants but such information is readily available as a public record on file in the General Court of Justice, Wake County Courthouse, Raleigh, NC.

The jobs the above workers performed were not reinspected after their arrests.

INTERROGATORY NO. 15-WB. Has QA/QC conducted an audit of any of the specific construction areas where any of the workers identified in the article in 11-WB was working or had worked?

ANSWER: A formal audit has not been performed because of the said arrests, although an evaluation of these workers' work has been conducted to assess any quality implications of their work. Audits do take place at the site, however, and it is possible that the work of these individuals has incidentally been subjected to audit under the on-going QA program.

INTERROGATORY NO. 16-WB. If the answer to 15-WB was affirmative, please supply copies of any such QA/QC audit?

ANSWER: Not applicable.

INTERROGATORY NO. 17-WB. Please supply copies of all inspection reports on the jobs performed by the workers identified above.

ANSWER: Inspection reports are not recorded in all cases on the basis of individual craftsmen involved in the work. A reasonable effort has been made to identify reports applicable to the work areas in which these individuals worked. These reports will be produced for inspection and copying per Applicants' response to Interrogatory No. 8-WB above.

INTERROGATORY NO. 18-WB. At the present time, how many workers at the Harris site use drugs while on the site? (An answer giving the "best estimate" is adequate). Please break down by types of jobs performed by the workers using drugs on site (again, "best estimate" is adequate).

ANSWER: There are presently no workers who Applicants are aware of using drugs while on the site. Consequently, Applicants have no "best estimate" to provide.

INTERROGATORY NO. 19-WB. How were the figures (or estimates) in 18-WB above derived? Please provide all bases and who exactly made the estimate.

ANSWER: See response to Interrogatory No. 18-WB above.

INTERROGATORY NO. 20-WB. What types of drugs are used by workers identified in 18-WB above? (Again, "best estimate" is adequate).

ANSWER: See response to Interrogatory No. 18-WB above.

INTERROGATORY NO. 21-WB. What is the Applicants' policy about workers using drugs while on site?

ANSWER: See response to Interrogatories No. 31-WB, 32-WB and 33-WB.

INTERROGATORY NO. 22-WB. Have any workers been fired, suspended, reprimanded, or had other adverse job actions taken against them for using drugs while on site?

ANSWER: Yes.

INTERROGATORY NO. 23-WB. If the answer to 22-WB is affirmative, please describe all such actions, including the jobs being performed by the worker, what drug the worker was using, and whether any of the jobs performed by that worker was reinspected. (Names of workers are not required).

ANSWER: Reasonable searches of CP&L and Daniel International personnel records have been conducted to identify workers terminated for activities which included use of drugs while on site. Applicants are not aware of any lesser adverse job actions taken or of employees of other contractors at the Harris site identified as having used drugs while on the site. The following responsive information has been identified:

WORKER A:

Job Description: Utility (housekeeping)  
Drug Involved: marijuana  
Work Performed: general cleanup of work site in  
safety and non-safety related areas  
Work Reinspected: No

WORKER B:

Job Description: Carpenter's Helper  
Drug Involved: marijuana  
Work Performed: carried lumber and materials during  
construction on Emergency Service Water Intake Structure  
Work Reinspected: No

WORKER C:

Job Description: Utility (housekeeping)  
Drug Involved: marijuana  
Work Performed: general cleanup of work site in  
safety and non-safety related areas  
Work Reinspected: No

WORKER D:

Job Description: Sheet Metal Welder  
Drug Involved: marijuana  
Work Performed: welding on non-safety HVAC hangers  
and temporary supports.  
Work Reinspected: No

WORKER E:

Job Description: Utility (housekeeping)  
Drug Involved: marijuana



Work Performed: general cleanup of work site in  
safety and non-safety related areas  
Work Reinspected: No

WORKER F:

Job Description: Electrical Helper  
Drug Involved: marijuana  
Work Performed: install cable tray (non-safety  
related) in Waste Processing Building  
Work Reinspected: No

WORKER G:

Job Description: Utility (tool room)  
Drug Involved: marijuana  
Work performed: issue tools to craft personnel  
and maintain tool room area  
Work Reinspected: No

WORKER H:

Job Description: Iron Worker Welder  
Drug Involved: marijuana  
Work Performed: arc gouged the temporary cat walks off  
containment liner wall and installed electrical conduit  
supports in Reactor Auxiliary Building  
Work Reinspected: No

WORKER I:

Job Description: Iron Worker Welder  
Drug Involved: marijuana  
Work Performed: arc gouged temporary cat walks off  
containment liner wall and installed electrical conduit  
supports in Reactor Auxiliary Building  
Work Reinspected: No

WORKER J:

Job Description: Truck Driver  
Drug involved: marijuana  
Work Performed: delivered materials and equipment  
on job site and off-site to other plants  
Work Reinspected: No

WORKER K:

Job Description: Truck Driver  
Drug Involved: marijuana  
Work Performed: delivered materials and equipment on  
job site and off-site to other plants  
Work Reinspected: No

WORKER L:

Job Description: Truck Driver

Drug Involved: marijuana

Work Performed: delivered materials and equipment  
on job site and off-site to other plants

Work Reinspected: No.

INTERROGATORY NO. 24-WB. Did the Applicants request the Wake County Sheriff's Department to investigate drug abuse at the Harris site, prior to the arrests of the workers identified in the article described in 11-WB?

ANSWER: CP&L requested a meeting with the Wake County Sheriff's Department to explore the merits of using undercover agents for drug use detection at the Harris Project.

INTERROGATORY NO. 25-WB. If the answer to 24-WB is affirmative, please describe who initiated the request, to whom on the Sheriff's Department the request was made, on what grounds such a request was made, and the date on which the request was made. Please provide any documentation (including letters, phone logs, etc.) of this request.

ANSWER: On August 30, 1984, a written request was made by R. A. Watson, Vice President - Harris Nuclear Project, to then Captain T. W. Lanier, Wake County Sheriff's Department, to schedule a meeting to discuss illegal drug activity in the vicinity of the Harris Nuclear Project. As a result of that meeting, arrangements were made for conducting an undercover operation at the Harris site involving the State Bureau of Investigation, the Wake County Sheriff's Department, and CP&L's security personnel.

INTERROGATORY NO. 26-WB. What actions do the Applicants take to determine if any of the workers at the Harris site are using drugs while on the site? This includes, but is not limited to, searches of persons or property, urine sampling, and lie detector tests. Please describe each action in detail.

ANSWER: The actions taken include observation of incoming workers; periodic searches of lunch boxes, briefcases and other containers being carried by workers upon entering the site; a search of these containers upon workers leaving the site; personal searches on site; urinalysis drug screen test; and the use of a narcotic detection dog.

In further detail, security personnel are at the entrances to the site and watch for physical signs of incapacity, i.e., staggering, falling, weaving, lack of coordination and odors. These observations are also made by timekeeping and supervisory personnel

assigned to monitor the entrance and exit of workers. On a random basis, lunch boxes, briefcases and other containers are opened for inspection. Workers must open their containers in such a manner as to allow security personnel to view all contents and compartments thereof. Based on information and/or controlled substance possession/use discovered, identified workers are directed to submit to a search and/or a urinalysis drug screen test. Security, Employee Relations and Industrial Relations personnel conduct the searches and arrange for the urinalysis drug screen test. Searches of workers include detail search of the individual's clothing, work area and any tools, equipment or personal property. Any vehicles within the construction security fence are subject to be searched also. At the direction of the Construction Security Unit, a narcotic detection dog is on site a minimum of two days per month. This dog is utilized to search a random sampling of areas on site. If specific requests or information is available relative to specific areas, those areas are given priority for search by the narcotic detection dog.

As included in the response hereafter to Interrogatory No. 33-WB, CP&L has undertaken programs to train its supervisory employees to recognize aberrant behavior in workers, including symptoms of controlled substance abuse. The major construction contractor at the Harris site has also conducted training for its supervisory personnel. Additionally, management at the Harris site encourages all site employees to observe and report any incident of controlled substance abuse. CP&L's Quality Check Program allows employees to report drug abuse information and protects their identity. Information received is reviewed and forwarded to the proper level of supervision for follow-up. Management has given site supervision a set of guidelines to follow in investigating alleged controlled substance abuse. Under these guidelines all inspector personnel (QA, QC and CI) are required to submit to a urinalysis drug screen test if they are suspected of using controlled substances.

INTERROGATORY NO. 27-WB. Approximately how often are the actions in 26-WB conducted?

ANSWER: Personnel observation during entrance and exit - every shift change

Lunch boxes, briefcases and container searches - every shift change

Personal searches and urinalysis drug screen test - as warranted

Narcotic detection dog - random two days per month at the direction of Construction Security Unit

Employee and supervisory observations - on-going.

INTERROGATORY NO. 28-WB. Under what conditions are the actions in 26-WB conducted?

ANSWER: See answer to Interrogatory No. 26-WB above.

INTERROGATORY NO. 29-WB. What criteria is used by management to determine which workers are to be searched, etc., for possible drug abuse?

ANSWER: Criteria have not been specified for identifying workers to be searched for possible drug abuse. Rather, the procedures identify the necessary decision-makers and provide for case-by-case discretion in utilizing searches.

INTERROGATORY NO. 30-WB. How many workers have been determined to be using drugs from the actions described in 26-B?

ANSWER: The best available information is twenty-five (25).

INTERROGATORY NO. 31-WB. Please provide any documentation, including policy statement or manuals, which describe the Applicants' drug use policy.

ANSWER: Documentation will be produced for inspection and copying per Applicants' response to Interrogatory No. 8-WB above.

INTERROGATORY NO. 32-WB. Do the Applicants have any education, employee development programs, or the like which pertain to the prevention of drug use while on the site?

ANSWER: Yes.

INTERROGATORY NO. 33-WB. If the answer to 32-WB is affirmative, please submit details of any such programs, including but not limited to the frequency given, who on the staff gives the program, who receives the program, and what the contents of any such program are.



ANSWER: CP&L employees assigned to the Harris site receive an instructional program entitled "Drug and Alcohol Abuse Orientation for CP&L Employees," which was initially presented by supervision, and subsequently by Employee Relations and the Harris Training Unit. The instruction addresses CP&L's Drug and Alcohol Abuse Practice and Procedures, the adverse impact of drug and alcohol abuse, and includes a description of the CP&L's Employee Assistance Program. A presentation by CP&L management is a part of the instruction, and the employee receives the "Drug and Alcohol Abuse Reference Manual."

Supervisors and managers at the Plant have attended a "Drug and Alcohol Workshop for Supervisors," initially presented by the Plant Manager or his designee, the plant personnel representative and/or designated instructor from the Employee Relations Department. The purpose of the program is to provide the participants with a comprehensive review of CP&L's Drug and Alcohol Abuse Practices and Procedures, to review supervisory responsibilities, and to provide the participants with skills pertinent to implementing the Drug and Alcohol Abuse Practices and Procedures. Subsequently, said training was incorporated as part of a Workshop in the Assessment of Aberrant Behavior - a 12 to 16-hour course presented by Management Consultants of Chapel Hill - which Workshop includes 4 hours devoted to drug and alcohol abuse problems, practices and procedures.

In addition, in 1984 CP&L and contractor supervisors received briefings at the Harris site by an outside consultant and a corporate office manager on drug and alcohol abuse. The contractor, Daniel International, also has a Supervisory Drug Awareness Program to advise supervisors on policy, practices and recognition of drug abuse. Daniel's Technical Services Department personnel involved in QA/QC activities are likewise indoctrinated on policy, practices and recognition of drug abuse.



There is also an 8-hour Drug and Alcohol Abuse Training for Trainers program presented by experienced Human Resources personnel to personnel directors and representatives, select Nuclear Operations staff, select Nuclear Training Unit instructors and select Employee Relations staff to enable these participants to train or provide support for the drug and alcohol abuse programs.

INTERROGATORY NO. 34-WB. Do the Applicants have any drug rehabilitation program for Harris workers or recommend any such program for workers who may be using drugs on the site?

ANSWER: Effective April 1982, CP&L instituted an Employee Assistance Program designed to assist employees who develop personal problems. Part of this program is the availability of assistance in the rehabilitation process for drug related problems. Harris site contractors' employees involved in drug related problems have no formal rehabilitation programs that CP&L is aware of, other than health insurance coverage, due to the temporary nature of their duties.

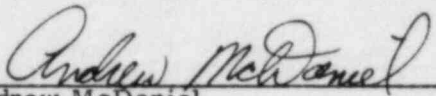
INTERROGATORY NO. 35-WB. If the answer to 34-WB is affirmative, please submit details of any such programs, including but not limited to the number of employees referred, who conducts the program, and what the contents of any such program are.

ANSWER: CP&L's Employee Assistance Program is operated by Mr. Barney Rickenbacker, whose title is Director - Employee Assistance Program. Mr. Rickenbacker answers directly to the Senior Vice President - Corporate Services.

As noted in CP&L's Drug and Alcohol Abuse Reference Manual, any employee who reports personal abuse of drugs or controlled substances before it is observed on the job will be counseled and will be referred to the Employee Assistance Program. Employees may also refer themselves to the program should they desire. However, when one of these approaches takes place, each employee is provided with the information that a temporary reassignment of duties may be necessary and that participation in the Employee Assistance Program does not guarantee their continued employment.

Since the beginning of this corporate program, no CP&L employee at the Harris site has been involved in rehabilitation efforts for drug abuse.

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May 20, 1985

ATTACHMENT A

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Answers 15-WB and 16-WB

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Answers 21-WB, 22-WB, 23-WB,  
31-WB, 32-WB, 33-WB, 34-WB,  
and 35-WB

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Answers 11-WB, 12-WB, 13-WB,  
and 14-WB

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employed by CP&L

Answers 11-WB, 12-WB, 13-WB,  
14-WB, 18-WB, 19-WB, 20-WB,  
22-WB, 24-WB, 25-WB, 26-WB,  
27-WB, 28-WB, 29-WB and  
30-WB

Reid Pannill  
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Answers 22-WB and 23-WB

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employed by CP&L

Answer 17-WB

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

CAROLINA POWER & LIGHT COMPANY )  
AND NORTH CAROLINA EASTERN )  
MUNICIPAL POWER AGENCY )

) Docket No. 50-400 OL  
)  
)  
)

(Shearon Harris Nuclear Power Plant) )

WAKE COUNTY  
NORTH CAROLINA

AFFIDAVIT OF R. A. WATSON

R. A. Watson, being duly sworn according to law, deposes and says that he is Vice President - Harris Nuclear Project Department for Carolina Power & Light Company; that the answers to interrogatories on Contention WB-3 contained in "Applicants' Answers to Conservation Council's Discovery Requests to Applicants on Contention WB-3 (Drug Abuse During Construction)" are true and correct to the best of his information, knowledge and belief; and that the sources of his information and belief are employees, agents and contractors of Carolina Power & Light Company.

R. A. Watson  
R. A. Watson

Sworn to and subscribed before me  
this 20<sup>th</sup> day of May, 1985.

Jette Markham  
Notary Public



RELATED CORRESPONDENCE

May 20, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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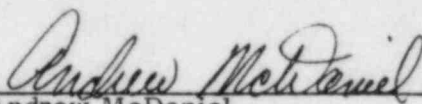
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DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that respective copies of "APPLICANTS' ANSWERS TO CONSERVATION COUNCIL'S DISCOVERY REQUESTS TO APPLICANTS ON CONTENTION WB-3 (DRUG ABUSE DURING CONSTRUCTION)" and "NOTICE OF APPEARANCE" were served this 20th day of MAY, 1985 by deposit in the United States Postal Service, first class, postage prepaid, to all parties on the attached Service List.

This the 20th day of May, 1985.

  
\_\_\_\_\_  
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Associate General Counsel  
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