

TENNESSEE VALLEY AUTHORITY

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JUL 11 1988

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

In the Matter of ) Docket Nos. 50-327  
Tennessee Valley Authority ) 50-328

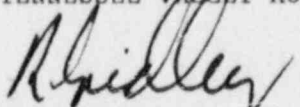
SEQUOYAH NUCLEAR PLANT (SQN) - INSPECTION REPORT NOS. 50-327, 50-328/87-67

Enclosed is supplemental information for our response to S. D. Ebnetter's letter to S. A. White dated January 7, 1988, regarding the subject inspection report. This information pertains to statistical data, test cutoff limits, and types of drugs discovered during random testing, and supplements information previously given to NRC for two significant inspection findings. TVA's initial response to this report was dated March 24, 1988. TVA continues to assess program requirements and initiate changes as needed.

If you have any questions, please telephone F. L. Ginn of my staff at 615/751-7667.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
R. Gridley, Director  
Nuclear Licensing and  
Regulatory Affairs

Enclosure  
cc: see page 2

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U.S. Nuclear Regulatory Commission

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cc (Enclosure):

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ENCLOSURE

SEQUOYAH NUCLEAR PLANT  
S. D. EBNETER'S LETTER TO S. A. WHITE  
DATED JANUARY 7, 1988  
SUPPLEMENTAL RESPONSE TO  
INSPECTION REPORT NOS. 50-327, AND 50-328/87-67

FINDING 2

NRC COMMENT

On page 2 of the NRC report it states:

"Chemical tests of body fluids are used for preemployment screening, for granting unescorted nuclear plant access, for cause, and for follow-up testing of ONP employees previously tested positive. Random testing of persons with unescorted access began on October 13, 1987."

- a. "Cutoff limits are high and may not identify "casual" or occasional use of drugs."

ONP INITIAL RESPONSE

The U.S. Department of Health and Human Services (HHS) proposed "Scientific and Technical Guidelines for Federal Drug Testing Programs" (HHS Guidelines) to implement President Reagan's Executive Order 12564 (52 Federal Register 30638, August 14, 1987). MED SV, when developing its alcohol and drug testing guidelines, used the cutoff levels recommended by the HHS guidelines. For marijuana, the cutoff on the initial screen is 100 ng/ml. Further, in a meeting with NUMARC, the FFD Working Group, and the NRC point-of-contact for FFD on January 20, 1988, NRC representatives indicated that NRC will abide by the HHS guidelines.

The ONP Labor Relations Staff (LRS) has been surveying other utilities to determine what cutoff levels are being used. Also, TVA's MED SV is conducting an analysis to determine the number of samples which fall within the 50-100 ng range. Once this information is reviewed, ONP will consider whether adjustments are warranted.

ONP SUPPLEMENTAL INFORMATION

TVA has completed its evaluation on the potential lowering of the initial screen of cannabinoids (marijuana) from 100 ng to 50 ng. This evaluation was based on data taken during a 60-day period which began in February 1988 by TVA's MED SV. They recorded the number of samples which fell within the 50- to 100-ng level and found that out of 2,575 specimens analyzed, only three samples were confirmed positive within the 50-100 ng range. Because the HHS Guidelines call for the prescreen of cannabinoids at the 100-ng level and three positives out of 2,575 samples within the 50-100 ng range are not significant, TVA will maintain the prescreen level of 100 ng.

FINDING 6

NRC COMMENT

On page 2 of the subject report it states:

"Minimal statistical data are kept, and there has been no systematic reporting or data analysis."

ONP INITIAL RESPONSE

Since random drug testing began in October 1987, data on number of tests performed, number of positive tests, types of drugs discovered, and disposition of results have been gathered on drug testing and the EAP. This information is reported to the Manager of Nuclear Labor Relations and the Manager of ONP on a monthly basis and continually reviewed to ensure that the FFD program is operating effectively.

ONP SUPPLEMENTAL RESPONSE

In regard to our initial response, TVA continues to keep statistical data on the results of the ONP Drug and Alcohol Screen program and is reviewing and reporting the information as noted in our initial response. This data from October 13, 1987 through April 23, 1988 is displayed in the attached figure.

As part of the random screening program initiated in October 1987, TVA was testing for methaqualones (ludes), which is not included in the HHS Guidelines. During the time period from October 1987 to today, there have been 6,902 samples analyzed with no positives for methaqualones. A recent survey by INPO and NUMARC of utilities with drug screening reveals that none are testing for methaqualones. In light of these findings, TVA will remove methaqualones from the list of drugs for which testing is performed.

FIGURE .

DRUG AND ALCOHOL SCREEN RESULTS FROM  
OCTOBER 13, 1987 THROUGH APRIL 23, 1988

	<u>Performed</u>	<u>Positive</u>	<u>Percent</u>
Random	4,272	32	0.8
Preemployment	2,225	39	1.7
Transfers	155	1	0.6
For Cause	36	3	8.0
Follow-up	76	5	6.5
Other	<u>138</u>	<u>0</u>	<u>0</u>
TOTAL	6,902	80	1.1