



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 19, 1998

50-324/925

Mr. J. S. Keenan, Vice President  
Carolina Power & Light Company  
Brunswick Steam Electric Plant  
Post Office Box 10429  
Southport, North Carolina 28461

SUBJECT: FITNESS FOR DUTY TESTING UNDER UNIQUE MEDICAL CONDITION -  
BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 AND 2 (TAC NO. M99047)

Dear Mr. Keenan:

This is in response to Carolina Power & Light Company's (CP&L's) letter of May 15, 1997, proposing, for a specific employee, the use of blood analysis as an alternative to urinalysis in the fitness-for-duty (FFD) evaluation process. The proposal addresses a situation where a certified Medical Review Officer has performed an evaluation of the employee's medical condition and determined that there is a medical reason for the individual's inability to produce a urine specimen consistent with the FFD testing guidelines in Appendix A to 10 CFR Part 26.

In lieu of a urine specimen, the proposed alternative calls for the collection and processing of a blood specimen in accordance with 10 CFR 26, Appendix A, Section 2.4, as applicable. CP&L believes that the blood specimen analysis achieves FFD evaluation results comparable to those produced by urinalysis for illegal drugs. CP&L states that it is aware of the limitations present with analyzing a blood specimen (i.e., a shorter half-life limits detection and no correlation exists to the thresholds established for urinalysis), but believes that this alternate evaluation process in conjunction with the current Continual Behavioral Observation Program, which the individual has been and continues to be subject to, provides reasonable assurance that a violation of the FFD program would be detected.

The NRC recognizes that there are medical conditions that may make the collection of urine specimens difficult or hazardous to the patient. Also, there are medical problems, such as super obesity, that could result in abnormal specimens of body fluids. As a result, the NRC has previously provided guidance regarding acceptable actions to be taken for individuals unable to provide urine specimens as a result of medical conditions. The NRC expects that the licensee's medical staff, in consultation with the Medical Review Officer, will evaluate these problems, on

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a case-by-case basis, to determine the appropriate alternative to urinalysis and that the results of these evaluations will be appropriately documented. On this basis, the NRC staff concludes that the above-described alternative, as proposed by CP&L, is acceptable and consistent with the intent of both 10 CFR Part 26 and the FFD testing guidelines in Appendix A to 10 CFR Part 26. Thus, pursuant to paragraph 1.1 of 10 CFR Part 26, Appendix A, the NRC approves the use of blood analysis as an alternative to urinalysis in the FFD evaluation process in the specific case described by CP&L in its letter of May 15, 1997.

If you have any questions regarding this matter, please contact Mr. David Trimble at (301) 415-2019.

Sincerely,

/s/

John A. Zwolinski, Acting Director  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-325  
and 50-324

cc: See next page

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If you have any questions regarding this matter, please contact Mr. David Trimble at (301) 415-2019.

Sincerely,

/s/

John A. Zwolinski, Acting Director  
Division of Reactor Projects - I/II  
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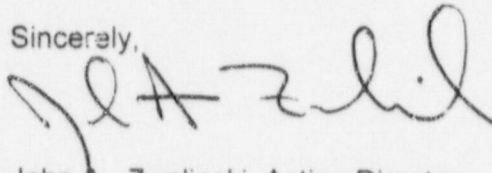
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| NAME   | DTrimble <i>ST</i> | EDunnington | LBush    | STreby  | PTKuo     | JZwolinski <i>[Signature]</i> |
| DATE   | 10/13/98           | 10/6/98     | 10/6/98  | 10/6/98 | 10/9/98   | 10/9/98                       |
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If you have any questions regarding this matter, please contact Mr. David Trimble at (301) 415-2019.

Sincerely,

A handwritten signature in cursive script, appearing to read "John A. Zwolinski".

John A. Zwolinski, Acting Director  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-325  
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cc: See next page

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Brunswick Steam Electric Plant  
Units 1 and 2

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