



# PECO NUCLEAR

A Unit of PECO Energy

PECO Energy Company  
965 Chesterbrook Boulevard  
Wayne, PA 19067-5691

February 24, 1998

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 1997 through December 1997

Dear NRC Officials:

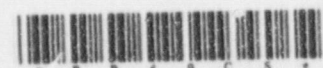
As required by 10CFR26.71(d), this letter submits the performance data for PECO Energy's Fitness-for-Duty (FFD) Program for the period July 1997 through December 1997. The data for our Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2, sites are provided in Attachments 1 and 2. Data for our Corporate Office and Nuclear Group (PECO Nuclear) Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA, and 965 Chesterbrook Boulevard, Wayne, PA, respectively) are provided in Attachment 3.

The data are reported on the January 1992 revision of the FFD Performance Data form provided by the Nuclear Energy Institute (NEI), formerly the Nuclear Management and Resources Council (NUMARC), and include the following.

- Drugs tested for and cut-off levels.
- Workforce population tested.
- Numbers of tests and results by population and type of test (i.e., pre-access, for-cause, random, follow-up, and other types of tests).
- Substances identified.

1021/1

9803030095 980224  
PDR ADOCK 05000277  
R PDR



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

- A summary of management actions.
- Analysis of the data and appropriate actions that have been taken.
- Random testing rate.

During this period, there was one significant event reported to the NRC in accordance with 10CFR26.73. Additional information regarding this event is contained in Attachment 1.

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "G. D. Edwards". The signature is fluid and cursive, with the first name "Ganett" being more legible than the last name "Edwards".

G. D. Edwards  
Director - Licensing

Attachments

cc: H. J. Miller, Administrator, Region I, USNRC (w/ attachments)  
A. C. McMurray, USNRC Senior Resident Inspector, PBAPS (w/ attachments)  
A. L. Burritt, USNRC Senior Resident Inspector, LGS (w/ attachments)



3  
4  
6

**ATTACHMENT 1**

Peach Bottom Atomic Power Station

Units 2 and 3

Fitness-for-Duty Performance Data

July 1997 through December 1997

Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR 26

PECO ENERGY COMPANY		DECEMBER, 31, 1997	
Company		6 Months Ending	
PEACH BOTTOM ATOMIC POWER STATION			
Location			
DAVID M. SARLEY		(215) 841-5703	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	50 / 15	Amphetamines	1000 / 500    _____ /
Cocaine	300 / 150	Phencyclidine	25 / 25    _____ /
Opiates	300 / 300	Alcohol (% BAC)	0.04    _____ /

Testing Results		Licenses Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		2213				1149	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		132	1			394	18
For Cause	Post accident	8	0			3	0
	Observed behavior	0	0			5	0
Random		261	2			143	1
Follow-up		25	0			58	0
Other		10	0			1	0
Total		436	3			1,204	19



## Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees	0	1	1	1	0	0	0						
Long-Term Contractors													
Short-Term Contractors	8	7	0	0	0	5	0						A
Total	8	8	1	1	0	5	0						23

Attachment 1  
Summary of Data Analysis and Management Actions  
Peach Bottom Atomic Power Station  
July - December 1997

I. Initiatives Taken

The following summarizes the results of sweeps conducted during the period by PECO Energy Company's drug sniffing canine teams as well as investigations and interviews used to confirm information about illicit activities at Peach Bottom Atomic Power Station (PBAPS).

- a. July 3, 1997 - For-cause interview of a contractor attempting to gain unescorted access. Contractor admitted drug related distribution charges, as well as past (1994) use of marijuana, cocaine, and crack. Contractor tested positive for cocaine. Unescorted access was denied.
- b. July 9, 1997 - For-cause interview of a contractor attempting to gain unescorted access. Contractor admitted a previous drug-related distribution arrest, as well as admitted use of marijuana, cocaine, and methamphetamine. Unescorted access was denied.
- c. July 15, 1997 - For-cause interview of a contractor attempting to gain unescorted access. Contractor admitted multiple DUI alcohol offenses. The contractor had not completed court-ordered rehabilitation following the most recent offense. Unescorted access was denied.
- d. August 18, 1997 - For-cause interview of a contractor attempting to gain unescorted access. Credible information was received regarding the contractors recent use of marijuana. Contractor denied marijuana use, but admitted associating with individuals who used marijuana. Contractor was also found to have pending DUI charges. Unescorted access was denied.
- e. August 18, 1997 - For-cause interview of a contractor attempting to gain unescorted access. Contractor admitted regular use of marijuana. Unescorted access was denied.
- f. September 10, 1997 - For-cause interview of a contractor attempting to gain unescorted access. Contractor disclosed during the interview an arrest for possession of cocaine with the intent to distribute. Contractor claimed last drug use was marijuana in 1992. Contractor tested positive for cocaine. Unescorted access was denied.
- g. September, 10 1997 - General team sweep of vendor muster area. Results: Five activations. No drugs found or forensic samples taken.
- h. September, 17, 1997 - For-cause interview of employee who tested positive for heroin. Employee admitted off-site drug usage. For-cause search of vehicle was performed utilizing narcotic canine. Results: Two activations. No drugs found or forensic samples taken; however, unopened alcoholic beverage container was discovered in vehicle. For-cause search of employee's work space performed. Unidentified medication discovered. Laboratory analysis confirmed prescription medication. Employee was denied unescorted access and subsequently resigned.
- i. September 24, 1997 - Contractor failed pre-access fitness-for-duty alcohol test. Contractor admitted excessive off-site drinking. Search of vehicle was negative for contraband. Unescorted access was denied.



- j. September 24, 1997 – General team sweep of Control Room. Results: Five activations. One forensic sample discovered, i.e., white, oblong pills in a film canister. Laboratory analysis confirmed prescription medication.
- k. September 24, 1997 – For-cause interview of contractor attempting to gain unescorted access. Contractor disclosed three DUI convictions and alcohol related misconduct separation from military service. Contractor disclosed eleven months in rehabilitation and still drinks alcohol socially. Unescorted access denied.
- l. September 24, 1997 – For-cause interview of a contractor attempting to gain unescorted access. During the interview the contractor disclosed an August 24, 1997 conviction for possession of marijuana. Contractor disclosed possession of drug paraphernalia in personal vehicle. Contractor refused vehicle search. Unescorted access was denied.
- m. September 24, 1997 – For-cause interview of contractor attempting to gain unescorted access. Contractor disclosed multiple drug-related offenses. Contractor disclosed attending rehabilitation in 1988, but admitted to relapse with drugs (1991) and two relapses with alcohol (most recently in 1996). Contractor placed on accelerated unannounced testing.
- n. September 29, 1997 – General team sweep of training center. Results: No activations.
- o. September 30, 1997 – Contractor failed pre-access fitness-for-duty alcohol test. During the interview, the contractor disclosed an August 21, 1997 conviction for DUI - alcohol. Contractor denied unescorted access.
- p. October 9, 1997 – For-cause interview of contractor following discovery of derogatory information. Contractor admitted cocaine addiction and three positive drug tests at various places of previous employment. Contractor disclosed completing in-house rehabilitation program in August 1997. On October 10, 1997, contractor provided proof of rehabilitation and was placed on accelerated unannounced testing. Access continued.
- q. October 15, 1997 – For-cause interview of contractor following discovery of derogatory information. Contractor disclosed two DUI convictions and a positive drug test in 1994 for methamphetamine. No indication of substance abuse treatment. Contractor placed on accelerated unannounced testing and access continued.
- r. November 17, 1997 – Employee failed random fitness-for-duty alcohol test. Employee denied possession of alcoholic beverages on Company property. Unescorted access denied.

## II. Management Actions

During the period, nineteen (19) contractor employees, i.e., eighteen (18) pre-access and one (1) random, tested positive at PBAPS. Unescorted access was denied the contractor employees.

During the period, three (3) PECO employees, i.e., one (1) pre-access, and two (2) random, tested positive at PBAPS. Unescorted access was denied and the employees were referred to the Employee Assistance Program. One employee subsequently resigned, the other two remain employed, but without unescorted access.

III. Events Reported Under 10 CFR 26.73

There was one significant FFD event reported by PBAPS during the period. A member of site management tested positive for alcohol on a random drug and alcohol test. The drug test was negative. The individual's unescorted access denied. The individual satisfactorily completed a prescribed rehabilitation program, has subsequently been returned to duty and unescorted access was reinstated.

IV. Audits/Inspections

An audit conducted during the period indicated that the PECO FFD program is being effectively implemented, in accordance with 10CFR Part 26. Strengths were identified in the areas of site collection and testing, alcohol testing, and overall program administration. A significant change to the program occurred with the outsourcing of the Medical Review Officer (MRO) function. This change was found to be effectively managed, based upon interviews with the MROs and review of their documentation.

A Deviation was identified regarding the maintenance of on-site testing facility procedures. The testing facility staff has reviewed the necessary procedures and revisions are in progress.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS.

VI. Additional Information

Actions Taken based upon Unconfirmed On-site Screening

PECO Energy has elected to temporarily suspend access for individuals as permitted by 10 CFR 26.24(d)

During the previous 6-month reporting period (i.e., January - June 1997), 83.3% of the specimens which were presumptive positive for cocaine as a result of preliminary on-site screening tests were subsequently reported as positive by the HHS-certified laboratory. The confirmation rate for marijuana was 58.8%. Therefore, in accordance with 10 CFR 26.24(d) no actions could be taken during this reporting period.

Reduced Marijuana Cut-off Level

During the period, there were seven (7) confirmed positive tests for marijuana at PBAPS. It is estimated that only three (3) of the specimens would have tested positive using the 100 ng/ml immunoassay cut-off level.



**ATTACHMENT 2**

Limerick Generating Station

Units 1 and 2

Fitness-for-Duty Performance Data

July 1997 through December 1997

Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR 26

PECO ENERGY COMPANY		DECEMBER 31, 1997	
Company		6 Months Ending	
LIMERICK GENERATING STATION			
Location			
DAVID H. SARLEY		(215) 841-5703	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	50 / 15	Amphetamines	1000 / 500    _____ /
Cocaine	300 / 150	Phencyclidine	25 / 25    _____ /
Opiates	300 / 300	Alcohol (% BAC)	0.04    _____ /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		2213				1149	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		43	0			245	3
For Cause	Post accident	16	1			3	0
	Observed behavior	1	0			2	1
Random		230	0			107	2
Follow-up		23	0			9	0
Other		7	0			0	0
Total		320	1			364	6

REV. 1/92



354

7

Attachment 2  
Summary of Data Analysis and Management Actions  
Limerick Generating Station  
July - December 1997

I. Initiatives Taken

The following summarizes the results of sweeps conducted during the period by PECO Energy Company's drug sniffing canine teams as well as investigations and interviews used to confirm information about illicit activities at Limerick Generating Station (LGS).

- a. August 7, 1997 - Investigation initiated on allegation that contractor Project Manager had stated he was looking to purchase marijuana to place in contractor employee's change area. Investigation confirmed the statement was made, but no credible information was developed indicating an intent to actually purchase marijuana. Records confirmed a previous random drug dog sweep was conducted of the Project Manager's area during the time frame in question with no drugs found. Site management addressed the issue with contractor management and a follow-up drug dog search was conducted. (See next report).
- b. September 4, 1997 - For-cause drug dog search of the contractor change area and contractor office area identified in previous report. Results: Eleven activations. No drugs found or forensic samples taken.
- c. December 12, 1997 - Random drug dog sweep of the warehouse office area. Results: Five activations. No drugs found or forensic samples taken.
- d. December 30, 1997 - Investigation conducted of contractor employee who tested positive for alcohol. Interview confirmed excessive off-site alcohol consumption prior to test. Vehicle search resulted in no indication of alcohol on site. Unescorted access denied.

II. Management Actions

During the period, six (6) contractor employees (i.e., three (3) pre-access, two (2) random, and one (1) for cause) tested positive at LGS. Unescorted access was denied the six (6) contractor employees.

During the period, one (1) PECO employee tested positive on a post-accident test. Unescorted access was denied and the employee was referred to the Employee Assistance Program.

III. Events Reported Under 10 CFR 26.73

During the period there were no significant FFD events reported by telephone under 10 CFR 26.73 by LGS.

IV. Audits/Inspections

An audit conducted during the period indicated that the PECO FFD program is being effectively implemented, in accordance with 10CFR Part 26. Strengths were identified in the areas of site collection and testing, alcohol testing, and overall program administration. A significant change to the program occurred with the outsourcing of the Medical Review Officer (MRO) function. This change was found to be effectively managed, based upon interviews with the MROs and review of their documentation.



A Deviation was identified regarding the maintenance of on-site testing facility procedures. The testing facility staff has reviewed the necessary procedures and revisions are in progress.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS.

VI. Additional Information

Actions Taken based upon Unconfirmed On-site Screening

PECO Energy has elected to temporarily suspend access for individuals as permitted by 10 CFR 26.24(d).

During the previous 6-month reporting period (i.e., January - June 1997), 83.3% of the specimens which were presumptive positive for cocaine as a result of preliminary on-site screening tests were subsequently reported as positive by the HHS-certified laboratory. The confirmation rate for marijuana was 58.8%. Therefore, in accordance with 10 CFR 26.24(d) no actions could be taken during this reporting period.

Reduced Marijuana Cut-off Level

During the period, three (3) specimens confirmed positive for marijuana at LGS. It is estimated that only one (1) of the specimens would have tested positive using the 100 ng/ml immunoassay cut-off level.

### **ATTACHMENT 3**

Corporate and Nuclear Group (PECO Nuclear) Headliners

Fitness-for-Duty Performance Data

July 1997 through December 1997



Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR 26

PECO ENERGY COMPANY		DECEMBER 31, 1997	
Company		8 Months Ending	
CORPORATE AND NUCLEAR GROUP HEADQUARTERS			
Location			
DAVID M. SARLEY		(215) 841-5703	
Contact Name		Phone (include area code)	
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26			
Marijuana	50 / 15	Amphetamines	1000 / 500 _____ /
Cocaine	300 / 150	Phencyclidine	25 / 25 _____ /
Opiates	300 / 300	Alcohol (% BAC)	0.04 _____ /

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number with Unescorted Access		2213				1149	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		14	0			2	0
For Cause	Post accident	0	0			0	0
	Observed behavior	0	0			0	0
Random		69	0			6	0
Follow-up		9	0			0	0
Other		1	0			0	0
Total		93	0			8	0

### Breakdown of Confirmed Positive Tests for Specific Substances

	Marijuana	Cocaine	Opiates	Amphetamines	Phencyclidine	Alcohol	Refusal to Test	1	2	3	4	5
Licensee Employees	0	0	0	0	0	0	0					
Long-Term Contractors												
Short-Term Contractors	0	0	0	0	0	0	0					
Total	0	0	0	0	0	0	0					



Attachment 3  
Summary of Data Analysis and Management Actions  
Corporate and Nuclear Group (PECC Nuclear) Headquarters  
July - December 1997

I. Initiatives Taken

- a. September 24, 1997 - General team sweep of the Chesterbrook "C" Wing, Emergency Preparedness area. Results: Three (3) activations. No drugs found or forensic samples taken.
- b. December 5, 1997 - General team sweep of the Chesterbrook "A" Wing, Resource Recovery area. Results: Five activations. No drugs found or forensic samples taken.

II. Management Actions

There were no positive test identified during the period.

III. Events Reported Under 10 CFR 26.73

There were no events reported during the period.

IV. Audits/Inspections

An audit conducted during the period indicated that the PECO FFD program is being effectively implemented, in accordance with 10CFR Part 26. Strengths were identified in the areas of site collection and testing, alcohol testing, and overall program administration. A significant change to the program occurred with the outsourcing of the Medical Review Officer (MRO) function. This change was found to be effectively managed, based upon interviews with the MROs and review of their documentation.

A Deviation was identified regarding the maintenance of on-site testing facility procedures. The testing facility staff has reviewed the necessary procedures and revisions are in progress.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS.

VI. Additional Information

Actions Taken Based upon Unconfirmed On-site Screening

Specimens collected at the Corporate and Nuclear Group (PECO Nuclear) Headquarters are forwarded directly to the HHS-certified laboratory for testing. On-site screening is not conducted.

Reduced Marijuana Cut-off Level

There were no positive tests for marijuana during the period.