

# NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY  
WESTERN MASSACHUSETTS ELECTRIC COMPANY  
HOLYOKE WATER POWER COMPANY  
NORTHEAST UTILITIES SERVICE COMPANY  
NORTHEAST NUCLEAR ENERGY COMPANY

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Docket No. 50-423

A06304

B12425

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

Reference: (1) W. F. Kane letter to J. F. Opeka, dated January 6, 1987.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3  
Drug Control Programs

In response to your request for information concerning the practices and techniques used to detect drug abuse and determine fitness for duty at Millstone Unit 3, both now and during construction, the following information is provided.

Introduction

Northeast Utilities has always recognized that the potential for drug and alcohol abuse are of national proportions, and the potential for those types of activities might exist within the Millstone Station workforce. Based on that recognition, we have undertaken a number of programs over the years to ensure both the safety of our employees and the public.

Drug/Alcohol Abuse Control Practices During Construction

Construction on Millstone Unit 3 started in 1974. After a period of approximately two (2) years, work was essentially stopped, and only a small workforce was active at the site. In 1980, construction activity increased, as did the site population which peaked in 1984, with approximately 5,000 people working on the project. The operating license was issued in November, 1985.

We have had a package search policy in use at our other operating units since the mid-1970s. This policy was used at Millstone Unit 3 during construction and continued upon receiving the operating license. The policy applied to all company and non-company personnel entering the protected area of the operating plants and the construction site area for Millstone Unit 3.

A random 'pat-down' search has been conducted at our other operating units since the mid-1970s for all non-regular station personnel who enter the protected area of the plant. This policy was put into effect at Millstone Unit 3 upon receiving the operating license.

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Starting in 1979, ongoing training was provided to our architect-engineer and constructor (Stone & Webster) security personnel in drug identification and recognition of alcohol or drug abuse. This program was also provided to Globe Security personnel in 1984 when they assumed the responsibility for security at Millstone Unit 3 under the direction of the Northeast Nuclear Energy Company (NNECO) Security department. The security guard force has orders to detain any individual they feel is acting in an aberrant manner or when they find an illegal drug or alcohol on an individual.

During construction, buses used to transport craft personnel to the construction site area gate were searched at various times for alcohol and drugs. In addition, vehicle patrols of the parking lots were established to ensure that security personnel were highly visible to deter any potential alcohol or drug use.

In March, 1982, Connecticut State Police, using canines trained in drug detection, toured Millstone Unit 3 in an attempt to find evidence of illicit drugs. The results were negative. Also in 1982, an undercover agent was placed in the Millstone Unit 3 workforce for the purpose of seeking evidence of illicit drugs. His usage was short-lived when his identity was compromised.

In 1983, Northeast Utilities Service Company (NUSCO) Security department personnel provided additional training sessions in drug recognition to all NUSCO and Stone & Webster management personnel.

Since 1984, the NUSCO Security department has provided an investigator on a full-time basis to pursue rumors and leads on possible drug use and related matters at Millstone Unit 3.

The Northeast Utilities Personnel Policy and Procedure on alcohol and drugs was issued in January, 1984. A training program was presented to various supervisors at that time. The training program included presentations by the Connecticut State Police and instructions on how to recognize abnormal behavior generally observed in individuals who abuse alcohol and drugs.

A Quality Concerns function was initiated formally in May and June, 1985 as a result of several allegations (not related to substance abuse) which were received on the Millstone Unit 3 construction site. Effective July 22, 1985, a full-time Quality Concerns program Manager was designated, reporting directly to the Vice President, Generation Engineering and Construction. The program Manager was responsible for directing the investigation of all allegations received on the Millstone Unit 3 project. At the same time, a Quality Concerns office, staffed with a contract engineer, was put into place on the site. A program was initiated to provide maximum visibility to the effort. Letters were distributed to all workers advising them of the program and the Quality Concerns telephone number. Anonymity was assured to anyone who desired it.

The office remained in place until February, 1986. In the time period of the effort, there were nine (9) concerns (not related to substance abuse) registered with the office which resulted in the investigation of approximately thirty (30) items. No allegations of drug or alcohol abuse were received as a result of the Quality Concerns effort.



### Conclusion

The collective results of these programs have effectively controlled the potential drug and alcohol abuse at this facility during construction, and there was no evidence of any widespread problems. It is our assessment that the programs that were used over the years have been successful.

### Current Drug/Alcohol Abuse Control Practices

Our current programs in place at Millstone Unit 3 continue most of the practices established during construction. Security personnel, with the cooperation of station management personnel, have continually been active in identifying and denying access to personnel who appear unfit for work.

During outages or other periods of high activity, a visual inspection of all hand-carried packages is conducted rather than an equipment search.

Northeast Utilities has an employee assistance program in place as well as alcohol and drug policies which are applicable to all Northeast Utilities personnel at the station. These policies include guidelines to supervisory personnel in handling suspected alcohol or drug abusers and agreements with local hospitals for testing.

Chemical screening and testing of contractor Security personnel has been done since 1984. This program also provides for unannounced random retesting.

Frequent aggressive inspections are made of contractor trailers, locker and lunch rooms by security personnel to ensure high visibility.

We have exercised continuous aggressive enforcement of rules regarding drugs and alcohol on company property.

Both NNECO and NUSCO security departments monitor local newspapers for drug arrests and convictions to ensure our awareness of any employee or contractor who may be involved in these types of activities.

Our contractors are notified of our drug and alcohol/fitness for duty policies and procedures via correspondence. A specific letter regarding our drug and alcohol policies and procedures is sent to all contractors who are expected to be working on site during a particular outage.

The annual General Employee Training Program which all personnel who require unescorted access to nuclear stations must attend and pass includes a presentation of company policies on alcohol and drug abuse and also reminds personnel of their responsibility to report to their supervisor any person they feel is exhibiting aberrant behavior. These policies also specifically address the drug and alcohol issue regarding company property other than the work place, such as company parking lots.

As to your specific concerns regarding the potential for use of unauthorized substances in parking lots or other parts of the owner-controlled area, we have no evidence of a significant problem. Security personnel continue to be an established presence in these areas and their patrols and strict enforcement of site rules regarding drugs and alcohol appear to be effective.

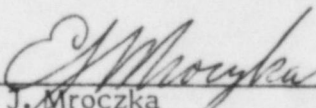
The existing program meets many of the EEI Guidelines which were recently endorsed by INPO and we feel this program is effective. However, the company has prepared a drug and alcohol/fitness for duty program which meets the provisions of the EEI Guide endorsed by INPO. We expect this program to be implemented in March, 1987.

Summary

We believe that these programs have proven successful in deterring attempts to bring alcohol and drugs into the protected areas and owner controlled areas, and in mitigating their use. In our assessment, continuation of these programs in conjunction with the proposed industry standards on Fitness for Duty provide a strong successful deterrent against alcohol and drug abuse.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

  
E. J. Mroczka  
Senior Vice President

cc: William F. Kane  
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J. T. Shedlosky, Senior Resident Inspector, Millstone Unit 3