



ARKANSAS POWER & LIGHT COMPANY

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September 28, 1987

T. GENE CAMPBELL
Vice President
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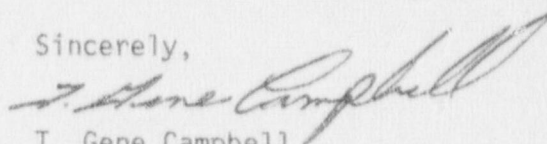
Mr. James G. Partlow, Director
Division of Reactor Inspection
and Safeguards
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313/50-368
License No. DPR-51 and NPF-6
Response to Inspection Report
50-313/87-12 and 50-368/87-12

Dear Mr. Partlow:

We have received your inspection report regarding the Fitness for Duty Program at Arkansas Nuclear One. We have reviewed the report and prepared the attached comments which deal with the significant observations of the report, including areas where AP&L's policies differ from the Commission's Policy Statement or the Edison Electric Institute Guide.

Sincerely,



T. Gene Campbell

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TGC:JDJ:djm
Attachment

cc: w/att: U. S. Nuclear Regulatory Commission
Document Control Desk
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Mr. J. E. Gagliardo, Chief
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The following section addresses the significant observations included in the Inspection Summary of Inspection Report Numbers 50-313/87-12 and 50-368/87-12.

1. AP&L written policies differ from some of the features characterized in the Commission's Policy Statement or recommended by the EEI Guide, as follows:

- A. Discharge Required

- NRC Inspection Report

- Discharge is not required for involvement with illegal drugs while on or off site or on or off duty, although loss of unescorted access usually results. AP&L's policy says that such acts are a dischargeable offense and that management will consider various factors when determining appropriate action. The policy does state that an employee convicted of an off site drug offense will be discharged; all other violations of policy may result in loss of unescorted access.

- Response

- The AP&L ANO Station Policy will be revised to add the provision that possession, use, and/or sale of illegal drugs on AP&L property will result in discharge.

- B. Alcohol

- NRC Inspection Report

- AP&L does not prohibit alcohol from company property and operation. AP&L prohibits "unauthorized" possession or consumption of alcohol on AP&L property. This was intended to permit the Executive Director, ANO Site Operations to approve requests for consumption of alcoholic beverages at the recreation area on station property.

- Response

- The AP&L ANO Station Policy will be revised to state that the possession or consumption of alcoholic beverages within the plant protected area will result in discharge, and unauthorized consumption of alcoholic beverages on AP&L property outside of the plant protected area may result in disciplinary action up to and including discharge.

AP&L feels that the above revision meets the intent of the EEI Guideline. The Commission's Policy Statement only addresses the use or possession of alcohol within the plant protected area.

C. Designated Positions

NRC Inspection Report

Handling of drug or alcohol use among employees in designated positions is not described; AP&L believes all ANO employees should be treated the same and does not use designated positions.

Response

We are not planning any change to the policy. In effect, AP&L treats all AP&L employees with an ANO security badge as being in a designated position.

D. Mandatory Testing

NRC Inspection Report

Testing for drugs is not mandated when an employee is involved with drugs off duty and off company premises or as a condition for retention. (The EEI Guide recommends that company policy mandates testing for those in designated positions in this instance, however, AP&L does not use designated positions.) AP&L policy allows the Executive Director, ANO Site Operations and Department General Manager to determine whether testing should be conducted for cause or as a condition of reinstatement.

Response

The ANO Station Policy will be revised to require testing prior to returning to work after an individual has been charged with the possession, sale, and/or distribution of illegal drugs off site. This, of course, is contingent upon AP&L being aware of the charges. The current policy provides for the discharge of an employee convicted of such charges, and will continue to do so.

E. Investigations

NRC Inspection Report

Employees are not informed that appropriate measures will be taken to determine the scope of illegal

involvement with drugs, i.e., to identify source of the drugs, and other employees who may be involved.

Response

AP&L is not planning any change to our current policy in this area. The Commission's Policy Statement does not have a specific statement regarding investigations. AP&L feels that the current policy of extensive testing, including random tests, plus the policy statement that any illegal drugs found on site will be turned over to local law enforcement agencies for further action is sufficient.

2. Chemical tests of body fluids are used for pre-employment screening of AP&L employees, pre-badge screening for contractors and selected AP&L employees, for cause and random tests of AP&L employees and contractors, and follow-up tests of AP&L employees in the Employee Assistance Program and rehabilitated contractors in special cases. Additionally:
 - A. Testing for alcohol use is given emphasis equal to that given testing for drugs.
 - B. Urine is collected under direct observation.
 - C. There are no cut-off limits established.
 - D. Many AP&L employees have never been tested because they were hired before pre-employment testing was initiated and because they have not yet been scheduled for a random test. The same is true for some long term contractor employees.

Response

AP&L believes that the random testing program provides reasonable assurance that plant personnel are fit for duty, in that the possibility of a chemical test is always present for each badged employee. Consequently, we are not planning to change our program in this area.

3. Most AP&L supervisors had received the appropriate training whereas most contractor employees had not.

Response

We are revising the program to ensure that contractor supervisors who are expected to be on site 12 months or more are scheduled for appropriate training.

4. No overall audit has been done of the program.

Response

An audit has been scheduled for the fourth quarter of 1987.

5. Statistical data that is assembled does not facilitate full analysis of program performance.

Response

The Employee Assistance Program performance data has been revised to enable more complete analyses of the program. AP&L chemical testing data is in the process of being automated, which will allow more in-depth analysis. Also, the distribution of this data is being reviewed.

6. The AP&L Employee Assistance Program appears to be effective.

AP&L also believes that the Employee Assistance Program is effective.

The following observations were made in the body of the Inspection Report and were not addressed in the Inspection Summary Section.

- Regarding behavioral observation training for supervisors, the Inspection Report stated: "Because AP&L did not have a computer program that would identify who had not received required training, accurate data could not be obtained." At this time, AP&L is still evaluating methods for identifying who has not received training.
- In the area of chemical testing, the Inspection Report states that when the screening test for a urine sample is positive, the portion of the sample not sent for confirmatory testing is stored in a container that is capped but not sealed. The instructions for control of the sample will be changed to require sealing of the sample when it is placed in storage.

Changes to the ANO Alcohol and Drug Policy and the Fitness for Duty Program discussed in this response will be implemented by January 1, 1988.