



Dustin T. Hamman  
Director Nuclear Regulatory Affairs

August 28, 2024  
000567

U.S. Nuclear Regulatory Commission  
Attn: NRC Document Control Desk  
Washington, DC 20555-0001

- References:
- 1) Letter RA 20-0016 (NRC ADAMS No. ML20063J237), "Electronic Submittal of Annual Fitness for Duty Program Performance Report and Annual Fatigue Report for 2019," dated February 27, 2020 from R. Benham, WCNOG, to USNRC
  - 2) Letter RA 21-0018 (NRC ADAMS No. ML21056A560), "Electronic Submittal of Annual Fitness for Duty Program Performance Report and Annual Fatigue Report for 2020," dated February 25, 2021 from R. Benham, WCNOG, to USNRC
  - 3) Letter RA 22-0018 (NRC ADAMS No. ML22053A082), "Electronic Submittal of Annual Fitness for Duty Program Performance Report and Annual Fatigue Report for 2021," dated February 21, 2022 from R. Benham, WCNOG, to USNRC
  - 4) Letter RA 23-0016 (NRC ADAMS No. ML23059A470), "Electronic Submittal of Annual Fitness for Duty Program Performance Report and Annual Fatigue Report for 2022," dated February 28, 2023 from D. T. Hamman, WCNOG, to USNRC

Subject: Docket No. 50-482: Correction to Annual Fitness for Duty Program Performance Reports for 2019, 2020, 2021, and 2022

Commissioners and Staff:

The References submitted the Wolf Creek Generating Station (WCGS) Annual Fitness for Duty (FFD) Program Performance Reports and Annual Fatigue Reports for 2019, 2020, 2021, and 2022.

Subsequent to the submittal of the above Reference reports, Access Screening completed an internal program review which identified that one "Follow-Up" FFD test personnel record was not in compliance with conditions for comprehensive "Follow-Up" testing in 10 CFR 26.31(c), which requires Licensees to administer both drug and alcohol tests to individuals who are subject to the subparts. "Alcohol Only" tests were administrated and documented correctly, however as required by 10 CFR 26.31(c), a comprehensive test including both a drug and alcohol test was not completed for "Follow-Up" testing, which invalidated the administered "Follow-Up" tests. While

data collected was complete and accurate, and documented correctly for the testing conducted, a process error was identified for the testing which invalidated the results. As a result, this impacts the previously reported "Follow-Up" testing data included in the 2021 and 2022 Annual Fitness for Duty Reports. Condition report (CR) 10030134 was generated in the WCGS Corrective Action Program to document that "Follow-Up" testing was performed as "Alcohol Only" which did not align with the requirements of 10 CFR 26.31(c).

Additionally, Access Screening identified an administrative reporting error associated with five tests from 2019, one test from 2020, and one test from 2021 identified as "Alcohol Only" in the Security Screening Information System (SSIS). It was determined that each test was administered completely and accurately, but the type of test ("For-Cause") was entered incorrectly into SSIS as "Alcohol Only", causing the tests to remain listed on the Open FFD Tests Report. As a result, the number of test reports tallied in the associated FFD Annual Report was incorrect. CR 1003018 was generated in the WCGS Corrective Action Program to document the change from "Alcohol Only" to "For-Cause" tests, and the need to correct the 2019, 2020, and 2021, Annual Fitness for Duty Reports.

The Enclosures include a summary of changes, as well as amended copies of the 2019, 2020, 2021, and 2022 NRC Form 891, and Annual Reporting Form for Drug and Alcohol Tests.

This letter contains no commitments. If you have any questions concerning this matter, please contact me at (620) 364-4204.

Sincerely,



Dustin T. Hamman

DTH/jkt

- Enclosure I: Summary of Changes to 2019, 2020, 2021, and 2022 Amended NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests (1 Page)
- Enclosure II: Copy of Amended 2019 NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests (2 Pages)
- Enclosure III: Copy of Amended 2020 NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests (2 Pages)
- Enclosure IV: Copy of Amended 2021 NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests (2 Pages)
- Enclosure V: Copy of Amended 2022 NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests (2 Pages)

cc: S. S. Lee (NRC), w/e  
J. D. Monninger (NRC), w/e  
G. E. Werner (NRC), w/e  
Senior Resident Inspector (NRC), w/e  
Licensing Correspondence – RA 24-000567, w/e

**Enclosure I to 000567**

**Summary of Changes to 2019, 2020, 2021, and 2022 Amended NRC  
Form 891, Annual Reporting Form for Drug and Alcohol Tests**  
(This enclosure contains 1 Page)

## **Summary of Changes to Amended Reporting Forms**

This enclosure provides the summary of changes to 2019, 2020, 2021, and 2022 Amended NRC Form 891, Annual Reporting Form for Drug and Alcohol Tests.

1. 2019 - Added For Cause test because they were incorrectly entered as Alcohol Only
2. 2020 - Added For Cause test because they were incorrectly entered as Alcohol Only
3. 2021 - Added For Cause test because they were incorrectly entered as Alcohol Only and deleted Follow-Up test because they were incorrectly administered and don't classify as Follow-Up test.
4. 2022 - Deleted Follow-Up test because they were incorrectly administered and don't classify as Follow-Up test.

**Enclosure II to 000567**

**Copy of Amended 2019 NRC Form 891, Annual Reporting Form for  
Drug and Alcohol Tests  
(This enclosure contains 2 Pages)**

**APPROVED BY OMB: CLEARANCE NO. 3150-0146**

**EXPIRES: 04/30/2021**

Estimated burden per response to comply with this collection request is 108 hours. This form is a voluntary means of reporting the information required under 10 CFR 26.417(b)(2) and 26.717. The information is required by NRC to obtain on an annual basis site specific fitness-for-duty (FFD) program performance data on drug and alcohol programs from licensees and other entities. Send comments regarding burden estimate to the FOIA, Privacy and Information Collection Branch (T5-F53), U.S. Nuclear Regulatory Commission, Washington DC 20555-0001, or by e-mail to [Infocollects.Resource@NRC.gov](mailto:Infocollects.Resource@NRC.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-1020, (3150-0146), Office of Management and Budget, Washington DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

- 1) All fields required unless marked 'optional'
- 2) Use of Adobe Reader 8 or later is required
- 3) Mouse over fields for additional information

Submission Update

Please explain the change(s) to the form

Reason For Testing was incorrectly documented as "Alcohol Only", corrected to "For Cause"

Facility

Wolf Creek [50-482]

Period of Report

2019

**Tests Conducted in the Calendar Year**

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access	49	855	5
Random	418	199	1
For Cause	5	3	0
Post-Event	1	0	0
Follow-up	5	25	0
Total (Calculated)	478	1,082	6

**FFD Program Random Testing Population and Rate**

Average number of licensee employees	Average number of contractors/vendors	Total size of the random testing pool throughout the period (Calculated)	Annual random testing percentage achieved for the testing pool
866	295	1,161	53

**Laboratory Testing**

Does your program use a Licensee Testing Facility?  No  Yes  
(Yes / No)

Does your program terminate an individual's authorization or take administrative action on initial marijuana or cocaine positive test results from your licensee testing facility (26.717(d))?  Yes  No  Please Select

HHS-Certified Laboratory (Primary)  Clinical Reference Laboratory  HHS-Certified Laboratory (Backup)  Quest Laboratory

Identify your Blind Performance Test Sample supplier(s)  Sohly Laboratory

**26.717(d) Reporting Positive Initial Drug Test Results (Marijuana and Cocaine) - Licensee Testing Facility (LTF)**

Enter values into this table if your program terminates an individual's authorization or takes administrative action on the initial positive test result.

Substance	LTF Results	HHS Laboratory Results	MRO Determinations
Marijuana	<input type="text"/>	<input type="text"/>	<input type="text"/>
Cocaine	<input type="text"/>	<input type="text"/>	<input type="text"/>
Total (Calculated)	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Substances Tested**

Did your program only test for NRC-required substances AND at the NRC-specified minimum cutoff levels? (Yes / No)  Yes  No

Does your program conduct LOD testing permitted in 26.163(a)(2)? (Yes / No)  Yes  No

**Special Analyses Testing Results**

Total Number of "Dilute" Specimen Test Results (Optional)

Total Number of "Dilute" Specimens (Special Analyses Testing Conducted)

Substance	Use NRC Cutoffs?	Initial Cutoff	Confirmatory Cutoff	Limit of Detection (LOD) Testing?	Comment (Optional)
Alcohol	<input type="checkbox"/> Yes <input type="checkbox"/> No			Not Applicable	
Cocaine	<input type="checkbox"/> Yes <input type="checkbox"/> No			Yes	
Marijuana	<input type="checkbox"/> Yes <input type="checkbox"/> No			Yes	
Amphetamines	<input type="checkbox"/> Yes <input type="checkbox"/> No			Yes	
Opiates	<input type="checkbox"/> Yes <input type="checkbox"/> No			Yes	
PCP	<input type="checkbox"/> Yes <input type="checkbox"/> No			Yes	

**Substances Tested - continued**

**Summary of Management Actions - 26.717(b)(8)**

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Other(s)

Please elaborate:

FFD collector files provide evidence that individuals are competent and trained to perform FFD testing.

Topic 1 Description

QA audit 18-09-FFD/FM identified that FFD collector files did not contain required documentation per 10 CFR Part 26.85. (e) Files - Collection site personnel files must include each individual's resume of training and experience; certification or license, if any; references; job descriptions; records of performance evaluations and advancement; incident reports, if any; results of tests to establish employee competency for the position he or she holds, including, but not limited to, certification that collectors are proficient in administering alcohol tests consistent with the most recent manufacturer's instructions for the instruments and devices used; and appropriate data to support determinations of honesty and integrity conducted under § 26.31(b).

FFD collector files were organized to be consistent to contain the same data in the same order for each FFD collector. (Reference CR 00127474)

Add an additional Topic

**Person(s) Responsible for Information Provided**

Person 1 (required):

PAMELA	BLACK	ACCESS SPECIALIST	PABLACK@WCNOC.COM
First Name	Last Name	Position Title	Company Email Address

Person 2 (optional):

SONYA	JONES	SUPERVISOR ACCESS SCREENING	SOJONES@WCNOC.COM
First Name	Last Name	Position Title	Company Email Address

**Final Step (Required)** - NRC will consider this form authentic in accordance with 10 CFR 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

**Locked** Form Locked On: Jun 20, 2024 at 12:35:38 PM

**Save to Local PC** **Print this Report**

**Enclosure III to 000567**

**Copy of Amended 2020 NRC Form 891, Annual Reporting Form for  
Drug and Alcohol Tests  
(This enclosure contains 2 Pages)**



**APPROVED BY OMB: CLEARANCE NO. 3150-0146**

**EXPIRES: 04/30/2021**

Estimated burden per response to comply with this collection request is 108 hours. This form is a voluntary means of reporting the information required under 10 CFR 26.417(b)(2) and 26.717. The information is required by NRC to obtain on an annual basis site specific fitness-for-duty (FFD) program performance data on drug and alcohol programs from licensees and other entities. Send comments regarding burden estimate to the FOIA, Information Services Branch (T6-A10M), U.S. Nuclear Regulatory Commission, Washington DC 20555-0001, or by e-mail to [infocollects.Resource@NRC.gov](mailto:infocollects.Resource@NRC.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-1020, (3150-0146), Office of Management and Budget, Washington DC 20503. If a means used to impose information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

- 1) All fields required unless marked 'optional'
- 2) Use of Adobe Reader 8 or later is required
- 3) Mouse over fields for additional information

Submission Update

Please explain the change(s) to the form

Reason For Testing was incorrectly documented as "Alcohol Only", corrected to "For Cause"

Facility

Wolf Creek [50-482]

Period of Report

2020

**Tests Conducted in the Calendar Year**

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access	74	166	4
Random	419	129	0
For Cause	1	2	0
Post-Event	1	1	0
Follow-up	31	4	0
Total (Calculated)	526	302	4

**FFD Program Random Testing Population and Rate**

Average number of licensee employees	Average number of contractors/vendors	Total size of the random testing pool throughout the period (Calculated)	Annual random testing percentage achieved for the testing pool
826	213	1,039	52.7

**Laboratory Testing**

Does your program use a Licensee Testing Facility? No  Does your program terminate an individual's authorization or take administrative action on initial marijuana or cocaine positive test results from your licensee testing facility (26.717(d))? (Yes / No)

HHS-Certified Laboratory (Primary)  HHS-Certified Laboratory (Backup)

Identify your Blind Performance Test Sample supplier(s)

**26.717(d) Reporting Positive Initial Drug Test Results (Marijuana and Cocaine) - Licensee Testing Facility (LTF)**

Enter values into this table if your program terminates an individual's authorization or takes administrative action on the initial positive test result.

Substance	LTF Results	HHS Laboratory Results	MRO Determinations
Marijuana	<input type="text"/>	<input type="text"/>	<input type="text"/>
Cocaine	<input type="text"/>	<input type="text"/>	<input type="text"/>
Total (Calculated)	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Substances Tested**

Did your program only test for NRC-required substances AND at the NRC-specified minimum cutoff levels? (Yes / No)  Does your program conduct LOD testing permitted in 26.163(a)(2)? (Yes / No)

**Special Analyses Testing Results** Total Number of "Dilute" Specimen Test Results (Optional)  Total Number of "Dilute" Specimens (Special Analyses Testing Conducted)

Substance	Use NRC Cutoffs?	Initial Cutoff	Confirmatory Cutoff	Limit of Detection (LOD) Testing?	Comment (Optional)
Alcohol	<input type="text" value="Yes"/>			<input type="text" value="Not Applicable"/>	
Cocaine	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Marijuana	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Amphetamines	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Opiates	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
PCP	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	

**Substances Tested - continued**

**Summary of Management Actions - 26.717(b)(8)**

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Other(s)

Please elaborate:

Licensee identified NCV - medical review officer (MRO) expired reassessment and reinvestigation dates

Topic 1 Description

Access Authorization / FFD failed to successfully implement a psychological reassessment and reinvestigation process for Fitness for Duty Program Personnel. (MRO and MRO staff members)

Condition Report #143387 - implemented electronic process within SSIS application to provide 90 day, 60 day, and 30 day notifications for Fitness for Duty Program Personnel.

Add an additional Topic

**Person(s) Responsible for Information Provided**

Person 1 (required):

Pamela	Black	Access Specialist	Pam.Black@evergy.com
First Name	Last Name	Position Title	Company Email Address

Person 2 (optional):

Sonya	Jones	Supervisor Access Screening	Sonya.Jones@evergy.com
First Name	Last Name	Position Title	Company Email Address

**Final Step (Required)** - NRC will consider this form authentic in accordance with 10 CFR 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

Locked

Form Locked On: Jun 20, 2024 at 2:03:19 PM

Save to Local PC

Print this Report

**Enclosure IV to 000567**

**Copy of Amended 2021 NRC Form 891, Annual Reporting Form for  
Drug and Alcohol Tests  
(This enclosure contains 2 Pages)**

**APPROVED BY OMB: CLEARANCE NO. 3150-0146**

**EXPIRES: 09/30/2024**

Estimated burden per response to comply with this collection request is 106 hours. This form is a voluntary means of reporting the information required under 10 CFR 26.417(b)(2) and 26.717. The information is required by NRC to obtain on an annual basis site specific fitness-for-duty (FFD) program performance data on drug and alcohol programs from licensees and other entities. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [Infocollects.Resource@NRC.gov](mailto:Infocollects.Resource@NRC.gov), and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0146), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; e-mail: [oir\\_submission@omb.eop.gov](mailto:oir_submission@omb.eop.gov). The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

- 1) All fields required unless marked 'optional'
- 2) Use of Adobe Reader 8 or later is required
- 3) Mouse over fields for additional information

Submission Update

Please explain the change(s) to the form

Reason For Testing was incorrectly documented as "Alcohol Only", corrected to "For Cause"

Facility

Wolf Creek [50-482]

Period of Report

2021

Follow-up test not completed correctly. Should not be counted as Follow-up test.

**Tests Conducted in the Calendar Year**

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access	44	865	8
Random	397	202	5
For Cause	2	2	0
Post-Event	3	2	0
Followup	19	24	0
Total (Calculated)	465	1,095	13

**FFD Program Random Testing Population and Rate**

Average number of licensee employees	Average number of contractors/vendors	Total size of the random testing pool throughout the period (Calculated)	Annual random testing percentage achieved for the testing pool
801	216	1,017	58.8

**Laboratory Testing**

Does your program use a Licensee Testing Facility?  No  Yes  
 Does your program terminate an individual's authorization or take administrative action on initial marijuana or cocaine positive test results from your licensee testing facility (26.717(d))? (Yes / No)

HHS-Certified Laboratory (Primary)  HHS-Certified Laboratory (Backup)

Identify your Blind Performance Test Sample supplier(s)

**26.717(d) Reporting Positive Initial Drug Test Results (Marijuana and Cocaine) - Licensee Testing Facility (LTF)**

Enter values into this table if your program terminates an individual's authorization or takes administrative action on the initial positive test result.

Substance	LTF Results	HHS Laboratory Results	MRO Determinations
Marijuana	<input type="text"/>	<input type="text"/>	<input type="text"/>
Cocaine	<input type="text"/>	<input type="text"/>	<input type="text"/>
Total (Calculated)	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Substances Tested**

Did your program only test for NRC-required substances AND at the NRC-specified minimum cutoff levels? (Yes / No)  Does your program conduct LOD testing permitted in 26.163(a)(2)? (Yes / No)

**Special Analyses Testing Results** Total Number of "Dilute" Specimen Test Results (Optional)  Total Number of "Dilute" Specimens (Special Analyses Testing Conducted)

Substance	Use NRC Cutoffs?	Initial Cutoff	Confirmatory Cutoff	Limit of Detection (LOD) Testing?	Comment (Optional)
Alcohol	<input type="text" value="Yes"/>			<input type="text" value="Not Applicable"/>	
Cocaine	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Marijuana	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Amphetamines	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Opiates	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
PCP	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	

**Substances Tested - continued**

**Summary of Management Actions - 26.717(b)(8)**

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Random Testing

Topic 1 Description

In 2021 there have been 5 condition reports initiated for individuals arriving late for their scheduled FFD random test. CR 10006150 was written to perform a collective review of these issues to determine if any actions could improve performance or the process. Reference condition reports 00146543, 10000691, 10002986, 10003105 and 10006114.  
(HR -1, Projects -1, TRNG -1, QC -1, and RP -1)

Actions taken for CR 10006150: Those missing future tests will have a face-to-face discussion with their Supervisor and the Plant Manager or his designee to explain the reason for the missed test and actions that will be taken to prevent this in the future. Discussed this expectation with Access Screening and the Plant Manager.

Add an additional Topic

Topic 2

Program and System Management

Topic 2 Description

During the NRC Fitness for Duty Inspection 71130.08 it was identified the FFD refrigerator used to store specimen collections was reading between fluctuating between 43- and 44-degrees Fahrenheit. 10 CFR 26.117(j) states: "Specimens that have not been shipped to the HHS-certified laboratory or the licensee testing facility within 24 hours of collection and any specimen that is suspected of having been substituted, adulterated, or tampered with in any way must be maintained cooled to not more than 6°C (42.8 °F) until they are shipped to the HHS-certified laboratory."

The temperature was immediately corrected by adjusting the temperature set-point, high limit alarm and low limit alarm to the appropriate settings. Previous setpoints that were set on the fridge during installation were 42.1 and 62. A documentation audit was performed on specimens collected since new fridge was installed on 11-23-2020 which proved all specimen collections were able to be tested with no issues. Additional Validation: One of our Medical Review Officers provided validation that the 2-degree temperature difference had no effect on the specimens. This was communicated to the inspector performing the FFD Inspection.

Add an additional Topic

Topic 3

Policies and Procedures

Topic 3 Description

Condition Report recommendation to add CBD (cannabidiol) oil and products guidance to the fitness for duty program procedure. (Reference CR 10011074)

**Person(s) Responsible for Information Provided**

Person 1 (required):

Pamela	Black	SR Access Specialist	pam.black@evergy.com
First Name	Last Name	Position Title	Company Email Address

Person 2 (optional):

Sonya	Jones	Supv Access Screening	sonya.jones@evergy.com
First Name	Last Name	Position Title	Company Email Address

**Final Step (Required)** - NRC will consider this form authentic in accordance with 10 CFR 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

**Locked** Form Locked On: Jun 20, 2024 at 2:09:20 PM Save to Local PC Print this Report

**Enclosure V to 000567**

**Copy of Amended 2022 NRC Form 891, Annual Reporting Form for  
Drug and Alcohol Tests  
(This enclosure contains 2 Pages)**

**APPROVED BY OMB: CLEARANCE NO. 3150-0146**

**EXPIRES: 09/30/2024**

Estimated burden per response to comply with this collection request is 106 hours. This form is a voluntary means of reporting the information required under 10 CFR 26.417(b)(2) and 26.717. The information is required by NRC to obtain on an annual basis site specific fitness-for-duty (FFD) program performance data on drug and alcohol programs from licensees and other entities. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [Infocollects.Resource@NRC.gov](mailto:Infocollects.Resource@NRC.gov), and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0146), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; e-mail: [oira\\_submission@omb.eop.gov](mailto:oira_submission@omb.eop.gov). The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

- 1) All fields required unless marked 'optional'
- 2) Use of Adobe Reader 8 or later is required
- 3) Mouse over fields for additional information

Submission Update

Please explain the change(s) to the form

Follow-up test not completed correctly. Should not be counted as Follow-up test.

Facility

Wolf Creek [50-482]

Period of Report

2022

**Tests Conducted in the Calendar Year**

Reason For Testing	Total Number of Tests Conducted		Total Number of Positive, Adulterated, Substituted, and Refusal to Test Results
	Licensee Employees	Contractors/Vendors	
Pre-Access	41	656	6
Random	386	164	2
For Cause	1	2	1
Post-Event	4	0	0
Followup	12	41	1
Total (Calculated)	444	863	10

**FFD Program Random Testing Population and Rate**

Average number of licensee employees	Average number of contractors/vendors	Total size of the random testing pool throughout the period (Calculated)	Annual random testing percentage achieved for the testing pool
764	298	1,062	51.8

**Laboratory Testing**

Does your program use a Licensee Testing Facility?  No  Yes  
(Yes / No)

Does your program terminate an individual's authorization or take administrative action on initial marijuana or cocaine positive test results from your licensee testing facility (26.717(d))? (Yes / No)

HHS-Certified Laboratory (Primary)  HHS-Certified Laboratory (Backup)

Identify your Blind Performance Test Sample supplier(s)

**26.717(d) Reporting Positive Initial Drug Test Results (Marijuana and Cocaine) - Licensee Testing Facility (LTF)**

Enter values into this table if your program terminates an individual's authorization or takes administrative action on the initial positive test result.

Substance	LTF Results	HHS Laboratory Results	MRO Determinations
Marijuana	<input type="text"/>	<input type="text"/>	<input type="text"/>
Cocaine	<input type="text"/>	<input type="text"/>	<input type="text"/>
Total (Calculated)	<input type="text"/>	<input type="text"/>	<input type="text"/>

**Substances Tested**

Did your program only test for NRC-required substances AND at the NRC-specified minimum cutoff levels? (Yes / No)  Does your program conduct LOD testing permitted in 26.163(a)(2)? (Yes / No)

**Special Analyses Testing Results** Total Number of "Dilute" Specimen Test Results (Optional)  Total Number of "Dilute" Specimens (Special Analyses Testing Conducted)

Substance	Use NRC Cutoffs?	Initial Cutoff	Confirmatory Cutoff	Limit of Detection (LOD) Testing?	Comment (Optional)
Alcohol	<input type="text" value="Yes"/>			<input type="text" value="Not Applicable"/>	
Cocaine	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Marijuana	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Amphetamines	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
Opiates	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	
PCP	<input type="text" value="Yes"/>			<input type="text" value="Yes"/>	

**Substances Tested - continued**

**Summary of Management Actions - 26.717(b)(8)**

Summarize actions implemented to improve FFD program performance. As applicable, reference in the topic description audit reports, 30-day reports, and/or corrective action reports. If reporting information on more than three topics, select "Others" for Topic 3 to report any additional topics.

Topic 1

Policies and Procedures

Topic 1 Description

CR # 10015498 NRC NCV – denial sanctions leaving FFD Collection site before all collection procedures were completed is a refusal to test.  
NRC Inspection Report 2022-402 issued violation to Access Screening for 10 CFR 26.75 denial sanction guidance for licensee not imposing permanent denial when individual left collection facility without completing the FFD process.

Actions Taken - AI 01 – 008 (Denial Procedure) was revised to align with 10 CFR 26.75 – FFD Denial Sanctions include imposing permanent denial when individual leaves FFD collection site without completing all collection procedures. Reviewing Official has the responsibility to Determine if unescorted access shall be denied or terminated. WCNOG Access Screening Reviewing Officials complete a 2nd Reviewing Official concurrence document with denial and basis for denial prior to notifying individual.

Add an additional Topic

Topic 2

Training

Topic 2 Description

CR# 10015499/10016226 (NRC Minor) – FFD training and procedures were evaluated and revised accordingly to ensure the content is clear and concise as it relates to possession and use of cannabis (CBD) the second most prevalent active ingredient in cannabis (marijuana). 10 CFR Part 26.29 (a) (1) requires individuals understand and comply with consequences as they apply to fitness for duty. Definition of CBD Oil was added to procedure AI 01A-002.

Add an additional Topic

Topic 3

Other(s)

Topic 3 Description

CR # 10020323 - During QA audit 22-09-FFD/FM it was identified the Intoxilyzer 8000 printouts were degrading at a more accelerated rate than previously identified. The FFD consent (AIF 01A-002-03) was revised to log the BAC readings on the form to eliminate the need of retaining the intoxilyzer 8000 printouts.

Please elaborate:

Improvement to FFD consent to log actual BAC readings.

**Person(s) Responsible for Information Provided**

Person 1 (required):

Mallory	Rosales	SR Access Specialist	Mallory.Rosales@evergy.com
First Name	Last Name	Position Title	Company Email Address

Person 2 (optional):

Sonya	Jones	Supv Access Screening	sonya.jones@evergy.com
First Name	Last Name	Position Title	Company Email Address

**Final Step (Required)** - NRC will consider this form authentic in accordance with 10 CFR 26.11 only when the "Validate & Lock" button has been selected and all errors (i.e., those highlighted in red) have been corrected. The "Validate & Lock" button will change to "Locked" after the data validation process has been successfully completed and the form is ready for submission.

**Locked** Form Locked On: Jun 20, 2024 at 2:12:45 PM Save to Local PC Print this Report