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Institute of
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10 CFR 26.719

August 29, 2024

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

Subject: Institute of Nuclear Power Operations (INPO)
Docket No. 99901386
Unanticipated Result for FFD Performance Test Sample

Pursuant to 10 CFR 26.719(c)(1), Institute of Nuclear Power Operations (INPO) hereby provides, as an enclosure to this letter, a report of an unanticipated result for a Fitness for Duty (FFD) performance test sample.

On July 17, 2024, INPO's FFD collection facility reviewed a report from a Department of Health and Human Services certified laboratory, a performance test result that was not consistent with the expected result. INPO completed its investigation on August 13, 2024. Results of the investigation are documented in the enclosure to this letter.

INPO makes no commitments in this letter. If you have questions regarding this submittal, please contact Tim Chapin, INPO Fitness-for-Duty/Unescorted Access Manager, at (770) 644-8444 or email chapinta@inpo.org.

Sincerely,

Meagan Kirkland

Digitally signed by Meagan Kirkland
Date: 2024.08.29 09:36:05 -04'00'

Meagan Kirkland, INPO FFD/UA Program Manager

MJK/TAC

Enclosure: Unanticipated Result for FFD Performance Test Sample

cc/w: Renee Meeks, INPO Vice President Talent & Culture
Brian Zaleski, NRC Specialist Fitness-for-Duty/Access Authorization

ENCLOSURE

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Description

On July 16, 2024, Clinical Reference Laboratory (CRL), a Department of Health and Human Services certified laboratory located in Lenexa, Kansas, conducted a urine drug screening on blind specimen 2082340953 and reported a negative result on the same day. CRL was then contacted and informed by Institute of Nuclear Power Operations (INPO)'s Medical Review Officer (MRO) that Specimen 2082340953 was a blind quality control sample of Adulterated targeted at approximately 1.46 pH.

An investigation was consequently initiated by CRL at the request of INPO's MRO to re-analyze the specimen and determine the reason for the inaccurate results.

Investigation Results

On July 18, 2024, CRL initiated an internal investigation as to the reason for the testing error.

On August 13, 2024, CRL concluded:

"Based on a review of the initial drug and validity test results and reanalysis of the specimen, the laboratory has determined that the original testing was performed according to the standard operating procedures. The negative result does not appear to be a result of specimen or aliquot misidentification based on the consistent creatinine results.

The laboratory requires a pH meter test when the screening pH is less than or equal to 4.7. Two separate aliquots of the specimen were retested using the screening pH test. All retest results were below the lower decision point for the screening test and would have qualified for testing by metered pH. Additionally, the pH results were lowest for the third aliquot that was screened, and the second aliquot pH was lower than the original aliquot pH. These results suggest that the unknown adulterant or other component from the preparation of the submitted blind specimen was not evenly mixed with the specimen on the day it was received, and the laboratory's handing of the specimen during the investigation redistributed the adulterant."

Actions Taken

INPO communicated this concern to both the MRO and the HHS Laboratory providing blind specimens to INPO. A second Adulterated specimen from the same batch was sent to the laboratory on August 20, 2024. After MRO review, it was concluded that the second specimen was correctly reported as Adulterated.