

February 23, 2000

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

**DOCKET 50-255 - LICENSE DPR-20 PALISADES PLANT  
SEMI-ANNUAL FITNESS FOR DUTY PROGRAM PERFORMANCE REPORT  
JULY 1, 1999 THROUGH DECEMBER 31, 1999**

Attached is Consumers Energy's Semi-Annual Fitness For Duty Program Performance Report for the period July 1, 1999 through December 31, 1999. This report is submitted in accordance with the requirements of 10 CFR 26.71(d).

This is the first submittal from Consumers Energy excluding data associated with Big Rock Point Nuclear Plant, which is in the decommissioning process. Since we continue to administer a Fitness for Duty Program at the Big Rock plant site, data is maintained and readily available upon request.

Attachments 1 and 2 summarize test results at the Palisades Plant and the support locations.

**SUMMARY OF COMMITMENTS**

This letter contains no new commitments and no revisions to existing commitments.



Daniel G. Malone  
Acting Director, Licensing

CC Administrator, Region III, USNRC  
Project Manager, NRR, USNRC  
NRC Resident Inspector - Palisades  
NRC Big Rock Point Decommissioning Inspector - Region III  
TJTaylor, M-550, Jackson

Attachments

**ATTACHMENT 1**

**CONSUMERS ENERGY COMPANY  
PALISADES PLANT  
DOCKET 50-255**

**SEMI-ANNUAL FITNESS FOR DUTY PROGRAM  
PERFORMANCE REPORT**

**JULY 1, 1999 - DECEMBER 31, 1999**

**2 Pages**

**CONSUMERS ENERGY**  
**FFD PROGRAM PERFORMANCE REPORT**  
 July 1, 1999 - December 31, 1999

1. **MANAGEMENT SUMMARY**

A. **RANDOM TESTING**

During this reporting period, Consumers Energy conducted a total of 345 random tests with the following results:

<u>Donor Group</u>	<u>Random Tests</u>	<u>Results</u>
Employees	253	Random testing did not identify any positive drug/alcohol results.
Contractors	92	Random testing did not identify any positive drug/alcohol results.

The positive drug/alcohol rate for 1999 indicates a downward trend for employees:

	<u>Random Tests</u>		<u>Positive Rate</u>		<u>Leading Substance</u>	
	<u>Employees</u>	<u>C/V's</u>	<u>Employees</u>	<u>C/V's</u>	<u>Cocaine</u>	<u>THC</u>
1994	652	144	0.2%	0.7%	1	1
1995	665	207	0.0%	0.5%	--	1
1996	629	216	0.2%	0.9%	--	2
1997	891	120	0.2%	0.8%	--	3
1998	767	208	0.5%	0.0%	--	3
1999	496	140	0.2%	0.0%	1	--

B. **PRE-ACCESS TESTING**

A total of 645 pre-access tests were conducted resulting in eleven (11) positive results. All individuals were denied access.

C. **FOR CAUSE TESTING**

A total of four (4) For Cause tests were conducted during this reporting period. All results were negative and did not require disciplinary action.

**CONSUMERS ENERGY**  
**FFD PROGRAM PERFORMANCE REPORT**  
July 1, 1999 - December 31, 1999

D. APPEALS

The appeals process was not initiated during this reporting period.

2. **LESSONS LEARNED/INITIATIVES TAKEN**

An alcohol testing error occurred while conducting a For Cause test during back shift operation. At approximately 1800 hours a contract employee was detained from entering the protected area by a security officer who detected the odor of alcohol. Following procedure protocol, the individual was sent to the local hospital for a Fitness For Duty test. Alcohol readings were reported as .008% to the accompanying supervisor who sent the individual home awaiting results of the drug test. Upon receiving the readings at the plant site, the site Human Resource Administrator discovered the collector only administered one breath test per machine (both readings were .008%). Immediate action was initiated to 1) correctly administer the required alcohol tests and 2) retrain the hospital staff placing emphasis on reading the procedure prior to administering a test and explaining the necessity of proper completion of the alcohol test form. The individual's drug test was reported as negative and no disciplinary action was taken.

The on-site collection staff became Certified Professional Collectors, under the Drug and Alcohol Testing Industry Association's examination program.

3. **REPORTABLE EVENTS UNDER 10CFR26, SECTION 26.73**

During this six-month interval, Consumers Energy did not encounter any FFD event that required reporting under 10 CFR 26.73.

**ATTACHMENT 2**

**CONSUMERS ENERGY COMPANY  
PALISADES PLANT  
DOCKET 50-255**

**SEMI-ANNUAL FITNESS FOR DUTY PROGRAM  
PERFORMANCE REPORT**

**JULY 1, 1999 - DECEMBER 31, 1999**

**4 Pages**

**CONSUMERS ENERGY  
Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR26**

<u>Consumers Energy</u>	<u>December 31, 1999</u>
Company	6 Months Ending
<u>Palisades Nuclear Plant</u>	
Location	
<u>Judith A Smith</u>	<u>517-788-7072</u>
Contact Name	Phone (include Area Code)
Cutoffs: Screen/Confirmation (ng/ml) <input checked="" type="checkbox"/> Appendix A to 10CFR26	
Marijuana            /            Amphetamines            /            _____            /	
Cocaine                /            Phencyclidine            /            _____            /	
Opiates                /            Alcohol (% BAC)*            _____            /	

\*Any detectable amount for situations other than random.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
Average Number With Unescorted Access		796		N/A		231	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		157	0	---	---	453	11
FOR CAUSE	Post-Accident	0	0	---	---	0	0
	Observed Behavior	0	0	---	---	4	0
Random		209	0	---	---	69	0
Follow-up		15	0	---	---	22	0
Other		1	0	---	---	0	0
<b>TOTAL</b>		<b>382</b>	<b>0</b>	<b>---</b>	<b>---</b>	<b>548</b>	<b>11</b>

**Breakdown of Confirmed Positive Tests for Specific Substances**

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees													
Long-Term Contractors													
Short-Term Contractors	6	3	1	1		2							A
<b>Total</b>	<b>6</b>	<b>3</b>	<b>1</b>	<b>1</b>		<b>1/1</b>							<b>12/1</b>

**CONSUMERS ENERGY  
Fitness for Duty Program  
Performance Data  
Personnel Subject to 10CFR26**

<u>Consumers Energy</u>	<u>December 31, 1999</u>
Company	6 Months Ending
<u>Support</u>	
Location	
<u>Judith A Smith</u>	<u>517-788-7072</u>
Contact Name	Phone (include Area Code)

Cutoffs: Screen/Confirmation (ng/ml)     Appendix A to 10CFR26

Marijuana	/	Amphetamines	/	_____	/
Cocaine	/	Phencyclidine	/	_____	/
Opiates	/	Alcohol (% BAC)*		_____	/

\*Any detectable amount for situations other than random.

Testing Results		Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number With Unescorted Access		118		N/A		68	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		35	0	---	---	0	0
FOR CAUSE	Post-Accident	0	0	---	---	0	0
	Observed Behavior	0	0	---	---	0	0
Random		44	0	---	---	23	0
Follow-up		3	0	---	---	0	0
Other		0	0	---	---	0	0
<b>TOTAL</b>		<b>82</b>	<b>0</b>	<b>---</b>	<b>---</b>	<b>23</b>	<b>0</b>



**Breakdown of Confirmed Positive Tests for Specific Substances**

	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test	1	2	3	4	5	
Licensee Employees													
Long-Term Contractors													
Short-Term Contractors													A
<b>Total</b>													<b>0</b>