



**Northeast
Nuclear Energy**

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Millstone Nuclear Power Station
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The Northeast Utilities System

FEB 28 2000

Docket Nos. 50-245

50-336

50-423

B17997

Re: 10CFR26.71(d)

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

**Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3
Semiannual Fitness-for-Duty Performance Data
for July 1999 through December 1999**

The provisions of 10CFR26.71(d) require power reactor licensees to collect and compile fitness-for-duty program performance data on a standard form and submit the data to the Commission within 60 days of the end of each 6-month reporting period (January through June and July through December). Accordingly, Attachments 1 through 5 contain fitness-for-duty program performance data for July 1999 through December 1999.

The regulations allow flexibility in how to submit the data. For example, corporate and other support staff locations may be separately reported, but require that the following data be included: random testing rate; drugs tested for and cutoff levels, including results of tests using lower cutoff levels and tests for other drugs; work force populations tested; numbers of tests and results by population and type of test (i.e., pre-access, random, for-cause, etc.); substances identified; summary of management actions; and a list of events reported. Attachment 1 to this letter contains an explanation of the performance data form, a summary of the performance data, a summary of management actions and other significant fitness-for-duty events. Attachments 2 and 3 are separate compilations of data collected at Millstone Station and Northeast Utilities' corporate office, respectively. Attachment 4 is a compilation of the aforementioned sites in one data sheet. We believe that it is useful to submit separate and total data sheets to the NRC Staff to aid in the data collection and analysis process.

The drug and alcohol testing data for this testing period have been analyzed and any necessary corrective actions taken. Supporting information is on file at the Millstone Nuclear Power Station.

Also included with this submittal, as Attachment 5, is data collected by Westinghouse Electric who conducts pre-access drug and alcohol testing for individuals who require unescorted access to the Millstone Nuclear Power Station. Westinghouse Electric Corporation has a fitness-for-duty program that has been audited and accepted by Northeast Utilities.

There are no regulatory commitments contained within this letter.

If you have any questions regarding this submittal, please contact Mr. Paul Willoughby at (860) 447-1791 ext. 3655.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



Raymond P. Necci
Vice President - Nuclear Technical Services

Attachments (5)

cc: H. J. Miller, Region I Administrator
L. L. Wheeler, NRC Senior Project Manager, Millstone Unit No. 1
J. I. Zimmerman, NRC Project Manager, Millstone Unit No. 2
D. P. Beaulieu, Senior Resident Inspector, Millstone Unit No. 2
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
A. C. Cerne, Senior Resident Inspector, Millstone Unit No. 3
P. C. Cataldo, NRC Inspector

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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

Performance Data Form Explanation
Summary of Performance Data/Management Actions
Significant Fitness-for-Duty Events

February 2000

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

**Performance Data Form Explanation
Summary of Performance Data/Management Actions
Significant Fitness-for-Duty Events**

Performance Data Form Explanation

- Cutoffs

Northeast Utilities' cutoff levels differ from NRC standard cutoff levels in the marijuana category only. Northeast Utilities uses a 50 ng/ml screening cutoff level which is more conservative than the regulatory standard.

- Substances

Northeast Utilities testing program includes only the National Institute of Drug Abuse (NIDA) 5 substances.

- Contractor Personnel

Northeast Utilities does not maintain records for separate categories of contractors. Consequently, all contractor data is recorded under the short-term contractor personnel category.

- Average Number of Unescorted Access Vs. Random Testing Results

The average number of corporate support personnel with unescorted access to Millstone Station (see Attachment 3) includes employees from a variety of support locations; some at the corporate office, others at or near the plant site.

The data reported in the random test results category reflects the number of tests actually performed at both of Northeast Utilities' collection locations.

Although random selection of the corporate support personnel is performed in conjunction with the corporate office pool, specimen collection is actually done at the collection site nearest the individual's work location or current assignment frequently at the plant site. As a result, the number tested in the random category for the corporate office is less than anticipated, while the number tested in the same category for Millstone Station is higher than expected. However, the aggregate

data for total program performance (Attachment 4) demonstrates that the number of random tests performed is on target and has met the minimum required 50 percent testing rate.

- Confirmed Positive Tests for Specific Substances

This section contains the number of confirmed positive tests, recorded by substance, during the reporting period. Please note that there may be no direct correlation between the sum of these numbers and the number of positives entered on the front of the form. Positive tests for multiple substances per individual are recorded as separate items in this table.

- Regulatory and Northeast Utilities Cutoff Levels

Since Northeast Utilities uses a cutoff level for marijuana which is more conservative than the NRC, the "positive" column for that substance only is split; the left side indicates confirmed positives based on NRC cutoff levels and the right side indicates the confirmed positives based on Northeast Utilities' more conservative cutoff level.

- Other

This category is used to record "supplemental" tests performed during the report period. Supplemental tests are recollections of specimens which, for technical reasons, could not be processed by the NIDA laboratory. Examples of reasons for not processing include specimen leakage and insufficient specimen.

Summary of Performance Data

- 1454 tests performed.
- 834 tests were random.
 - Average population = 3279
 - Annual 50 percent minimum random testing rate achieved ($834/3279 = 25\% \times 2$ (because this report is done *semi-annually*) = 50 %).

- Percent confirmed positive rates:
 - Pre-access = 1.9 percent. (90 percent of confirmed positives were in this category)
 - Random = 0.11 percent.
 - Overall = 0.75 percent.
- There were 11 confirmed positive tests from 11 individuals. Six individuals refused an opportunity to meet with the Medical Review Officer (MRO) and are included in the breakdown below under "Administrative."

Breakdown:

-	Marijuana	4	(36 percent)
-	Cocaine	0	(0 percent)
-	Opiates (Heroin)	0	(0 percent)
-	Alcohol	1	(9 percent)
-	Administrative	6	(55 percent)
-	Nitrites	0	(0 percent)

There were no verified confirmed positive tests for any other substance.

- Regulatory vs. Northeast Utilities Cutoff Levels (Marijuana)

A total of four individuals tested confirmed positive for marijuana. All four samples screened at a level of 100 ng/ml or greater (NRC limit).

Management Actions

Nine contractor personnel tested confirmed positive for drugs or alcohol. All were during the pre-badging process and they were denied unescorted access. Of the nine, three were verified confirmed positives and six were administrative positives. All of these individuals will not be considered for unescorted access for a period of one year.

No candidate for employment with Northeast Utilities tested confirmed positive in a pre-employment test.

One Northeast Utilities employee tested confirmed positive for the first time. Consistent with company policy, the following actions were taken:

- Unescorted access was revoked for a minimum of 14 days.
- The employee was referred to the Employee Assistance Program.
- The individual was placed on paid medical leave for a minimum of 14 days (paid status contingent upon cooperation with the medical program and having sufficient sick time accrued).

One Northeast Utilities employee tested confirmed positive for the second time. Consistent with Northeast Utilities policy, employment has been terminated for this individual. This individual is not eligible for unescorted access for a period of three years.

Follow-up Program

Self identified that two individuals were not tested in accordance with the FFD Follow-up Program. Procedures require that upon return to work, individuals be tested once a month for the first four months. Contrary to this, one individual missed one month, the second individual missed two months.

Significant Fitness-for-Duty Events

There were no Significant Fitness-for Duty Events during this reporting period.

Proficiency Testing

A total of 230 blind proficiency specimens were processed for this 6-month period. There was one false negative and no false positives. The false negative test result was investigated by the Senior MRO of Northeast Utilities and the Director of Toxicology at the laboratory. The results of that investigation are on file with the Senior MRO at the corporate headquarters and the Fitness for Duty Administrator at the Millstone Nuclear Power Station.

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3

**Semiannual Fitness-for-Duty
Performance Data**

February 2000

**Fitness for Duty Program Performance Data
 for Personnel Subject to 10CFR 26**

Millstone Nuclear Power Station		December 31, 1999			
Company		6 Months Ending			
156 Rope Ferry Rd, Waterford, CT. 06385					
Location					
Cora Quinn-Ross		(860) 437-5914			
Contact Name		Area code and Phone #			
Cutoffs: Screen/Confirmation (ng/ml)		<input type="checkbox"/> Appendix A to 10CFR26			
Marijuana:	50/15	Amphetamines:	1000/500 _____ : /		
Cocaine:	300/150	Phencyclidines:	25/25 _____ : /		
Opiates:	300/300	Alcohol (%BAC):	0.040 _____ : /		
TESTING RESULTS		Licensee Employee		Contractor Personnel	
Average Number with Unescorted Access		2002		1099	
CATEGORIES	# Tested	# Positive	# Tested	# Positive	
Pre-Access	22	1	525	9	
Pre-Employment	4	0	0	0	
For Cause	0	0	3	0	
Random	511	1	278	0	
Follow-Up	7	0	5	0	
Infrequent Visitor	0	0	34	0	
Other	0	0	0	0	
TOTAL	544	2	845	9	

**Fitness for Duty Program Performance Data
 for Personnel Subject to 10CFR 26**

BREAKDOWN OF CONFIRMED POSITIVE TEST FOR SPECIFIC SUBSTANCES						
Categories	Licensee Employees		Contractor Personnel		Sub Total	
	NRC Limits	NU Limits	NRC Limits	NU Limits	NRC Limits	NU Limits
Marijuana	2	2	2	2	4	4
Cocaine	0		0		0	
Opiates	0		0		0	
Amphetamines	0		0		0	
Phencyclidine	0		0		0	
Alcohol	0		1		1	
Refusal to Test	0		0		0	
Administrative Positive	0		6		6	
Sub Total	2		9		Total 11	

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Attachment 3

Northeast Utilities Corporate Office

**Semiannual Fitness-for-Duty
Performance Data**

February 2000

**Fitness for Duty Program Performance Data
 for Personnel Subject to 10CFR 26**

Northeast Utilities - Corporate Office		December 31, 1999			
Company		6 Months Ending			
107 Seldon St. Berlin, CT. 06037					
Location					
Kathy Michalski		(860) 665-6224			
Contact Name		Area code and Phone #			
Cutoffs: Screen/Confirmation (ng/ml)		<input type="checkbox"/> Appendix A to 10CFR26			
Marijuana:	50/15	Amphetamines:	1000/500 _____ : /		
Cocaine:	300/150	Phencyclidines:	25/25 _____ : /		
Opiates:	300/300	Alcohol (%BAC):	0.040 _____ : /		
TESTING RESULTS		Licensee Employee		Contractor Personnel	
Average Number with Unescorted Access		178		0	
CATEGORIES		# Tested	# Positive	# Tested	# Positive
Pre-Access		15	0	0	0
Pre-Employment		3	0	0	0
For Cause		0	0	0	0
Random		44	0	1	0
Follow-Up		2	0	0	0
Infrequent Visitor		0	0	0	0
Other		0	0	0	0
TOTAL		64	0	1	0

**Fitness for Duty Program Performance Data
 for Personnel Subject to 10CFR 26**

BREAKDOWN OF CONFIRMED POSITIVE TEST FOR SPECIFIC SUBSTANCES						
Categories	Licensee Employees		Contractor Personnel		Sub Total	
	NRC Limits	NU Limits	NRC Limits	NU Limits	NRC Limits	NU Limits
Marijuana	0	0	0	0	0	0
Cocaine	0		0		0	
Opiates	0		0		0	
Amphetamines	0		0		0	
Phencyclidine	0		0		0	
Alcohol	0		0		0	
Refusal to Test	0		0		0	
Administrative Positive	0		0		0	
Sub Total	0		0		Total 0	

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Attachment 4

Northeast Utilities

Semiannual Fitness-for-Duty
Performance Data Compilation

February 2000

**Fitness for Duty Program Performance Data
 for Personnel Subject to 10CFR 26**

Northeast Utilities		December 31, 1999			
Company		6 Months Ending			
Compilation of Sites					
Location					
Cora Quinn-Ross		(860) 437-5914			
Contact Name		Area code and Phone #			
Cutoffs: Screen/Confirmation (ng/ml)		<input type="checkbox"/> Appendix A to 10CFR26			
Marijuana:	50/15	Amphetamines:	1000/500 _____ : /		
Cocaine:	300/150	Phencyclidines:	25/25 _____ : /		
Opiates:	300/300	Alcohol (%BAC):	0.040 _____ : /		
TESTING RESULTS		Licensee Employee		Contractor Personnel	
Average Number with Unescorted Access		2180		1099	
CATEGORIES		# Tested	# Positive	# Tested	# Positive
Pre-Access		37	1	525	9
Pre-Employment		7	0	0	0
For Cause		0	0	3	0
Random		555	1	279	0
Follow-Up		9	0	5	0
Infrequent Visitor		0	0	34	0
Other		0	0	0	0
TOTAL		608	2	846	9

**Fitness for Duty Program Performance Data
 for Personnel Subject to 10CFR 26**

BREAKDOWN OF CONFIRMED POSITIVE TEST FOR SPECIFIC SUBSTANCES						
Categories	Licensee Employees		Contractor Personnel		Sub Total	
	NRC Limits	NU Limits	NRC Limits	NU Limits	NRC Limits	NU Limits
Marijuana	2	2	2	2	4	4
Cocaine	0		0		0	
Opiates	0		0		0	
Amphetamines	0		0		0	
Phencyclidine	0		0		0	
Alcohol	0		1		1	
Refusal to Test	0		0		0	
Administrative Positive	0		6		6	
Sub Total	2		9		Total 11	

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Attachment 5

Westinghouse Electric Corporation

**Semiannual Fitness-for-Duty
Performance Data Compilation**

February 2000

9	Marijuana	Cocaine	Opiates	Amphe- tamines	Phency- clidine	Alcohol	Refusal to Test	Adulterants	1	2	3	4
Employees	0	0	0	0	0	0	0	0	0	0	0	0
Long-Term Contractors	0	0	0	0	0	0	0	0	0	0	0	0
Short-Term Contractors	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	0	0	0	0	0	0	0	0	0	0

LEGEND

- 1 = Barbiturates
- 2 = Benzodiazepines
- 3 = Methadone
- 4 = Methaqualone