



10CFR26.71(d)

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

February 24, 2000

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

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

Subject: Peach Bottom Atomic Power Station, Units 2 & 3
Limerick Generating Station, Units 1 & 2
Fitness-for-Duty Program Performance Data for the Period -
July 1999 through December 1999

Dear Sir/Madam:

As required by 10CFR26.71(d), this letter submits the performance data for PECO Energy's Fitness-for-Duty (FFD) Program for the period July 1999 through December 1999. The data for our Peach Bottom Atomic Power Station (PBAPS), Units 2 & 3, and Limerick Generating Station (LGS), Units 1 & 2, sites are provided in Attachments 1 and 2. Data for our Corporate Office and Nuclear Group (PECO Nuclear) Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA, and Berwyn Transportation Center, Wayne, PA, respectively) are provided in Attachment 3.

The data is reported on the January 1992 revision of the FFD Performance Data form provided by the Nuclear Energy Institute (NEI), formerly the Nuclear Management and Resources Council (NUMARC), and include the following:

- Drugs tested for and cut-off levels.
- Workforce population tested.
- Numbers of tests and results by population and type of test (i.e., pre-access, for cause, random, follow-up, and other types of tests).
- Substances identified.

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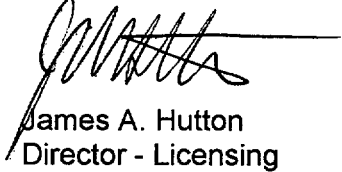
Attachments 1, 2, and 3 also include the following:

- A summary of management actions.
- Analysis of the data and appropriate actions that have been taken.
- Random testing rate.

During this period, there were no significant FFD events reported.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



James A. Hutton
Director - Licensing

Attachments

cc: H. J. Miller, Administrator, Region I, USNRC (w/attachment)
W. F. Kane, Director of Materials Safety & Safeguard, USNRC (w/attachment)
A. L. Burritt, USNRC Senior Resident Inspector, LGS (w/attachment)
A. C. McMurray, USNRC Senior Resident Inspector, PBAPS (w/attachment)

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

| | | | |
|--|-----------|--|---------|
| PECO Energy Company | | December 31, 1999 | |
| <small>Company</small> | | <small>6 Months Ending</small> | |
| Corporate and Nuclear Group Headquarters | | | |
| <small>Location</small> | | | |
| David M. Sarley | | 215 841-5703 | |
| <small>Contact Name</small> | | <small>Phone (include area code)</small> | |
| Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26 | | | |
| Marijuana | 50 / 15 | Amphetamines 1000 / 500 | _____ / |
| Cocaine | 300 / 150 | Phencyclidine 25 / 25 | _____ / |
| Opiates | 300 / 300 | Alcohol (% BAC) 0.04 | _____ / |

| Testing Results | | Licensee Employees | | Long-Term Contractor Personnel | | Short-Term Contractor Personnel | |
|---------------------------------------|-------------------|--------------------|------------|--------------------------------|------------|---------------------------------|------------|
| | | # Tested | # Positive | # Tested | # Positive | # Tested | # Positive |
| Average Number with Unescorted Access | | 2220 | | | | 1349 | |
| Pre-Access | | 25 | 0 | | | 1 | 0 |
| For Cause | Post accident | 2 | 0 | | | 0 | 0 |
| | Observed behavior | 0 | 0 | | | 0 | 0 |
| Random | | 61 | 0 | | | 21 | 0 |
| Follow-up | | 11 | 0 | | | 0 | 0 |
| Other | | 0 | 0 | | | 0 | 0 |
| Total | | 99 | 0 | | | 22 | 0 |

Breakdown of Confirmed Positive Tests for Specific Substances

| | Marijuana | Cocaine | Opiates | Amphetamines | Phencyclidine | Alcohol | Refusal to Test | 1 | 2 | 3 | 4 | 5 | |
|------------------------|-----------|---------|---------|--------------|---------------|---------|-----------------|---|---|---|---|---|---|
| Licensee Employees | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Long-Term Contractors | | | | | | | | | | | | | |
| Short-Term Contractors | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Total | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | 0 |

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ATTACHMENT 1

Peach Bottom Atomic Power Station

Units 2 and 3

Fitness-for-Duty Performance Data

July 1999 through December 1999

Attachment 1
Summary of Data Analysis and Management Actions
Peach Bottom Atomic Power Station
July – December 1999

I. Initiatives Taken

The following summarizes the results of sweeps conducted during the period by PECO Energy Company's drug sniffing canine teams as well as investigations and interviews used to confirm information about illicit activities at Peach Bottom Atomic Power Station (PBAPS).

- a. July 20, 1999 – Contractor employee discovered an empty Schlitz beer can in the Emergency Switchgear Room. The can was dated "1969." No further action taken.
- b. July 22, 1999 – Employee observed to be in possession of champagne bottles in his vehicle. Consensual search by Security revealed the bottles to be empty. Supervision notified. For cause testing completed with negative result. Employee counseled regarding the possession of alcoholic beverage containers on Station property.
- c. August 6, 1999 – General team sweep of Seal Team Muster Area and Modification Building. No drugs or forensic samples taken.
- d. August 8, 1999 – For cause interview of a contractor seeking unescorted access. Contractor disclosed 1996 positive drug test, 1996 conviction for possession of cocaine, and cocaine addiction. Contractor provided evidence of rehabilitation. Unescorted access granted with requirement for accelerated FFD testing.
- e. August 18, 1999 – For cause interview of contractor who disclosed arrest and pending DUI charges. Psychological evaluation conducted. Unescorted access continued with requirement for accelerated FFD testing.
- f. August 18, 1999 – For cause interview of a contractor who disclosed 1996 positive drug test. Interview revealed an omitted 1976 marijuana arrest with no evidence of rehabilitation. **Unescorted access was denied.**
- g. August 18, 1999 – For cause interview of a contractor who disclosed history of alcohol and cocaine addiction, as well as multiple arrests. Contractor provided evidence of rehabilitation. Unescorted access granted with requirement for accelerated FFD testing.
- h. August 19, 1999 – General team sweep of Training Center. No drugs found or forensic samples taken.
- i. September 1, 1999 – For cause interview of a contractor suspected of adulterating a pre-access urine sample. Contractor admitted drug use the previous week and to adulterating the urine sample. **Unescorted access was denied.**
- j. September 8, 1999 – For cause interview of contractor with multiple DUI convictions and a domestic battery arrest. Contractor provided proof of rehabilitation. Unescorted access granted after psychological interview and agreement for accelerated FFD testing
- k. September 8, 1999 – For cause interview of contractor based upon a 1995 unescorted access denial due to marijuana use. The contractor admitted recent (July 1999) use of marijuana. No evidence provided of rehabilitation. **Unescorted access was denied.**

- x. September 21, 1999 – For cause interview of a contractor seeking unescorted access. The contractors disclosed 1980 conviction for possession with intent to distribute thirty pounds of marijuana. During the interview the contractor disclosed chronic marijuana use with no evidence of rehabilitation. **Unescorted access was denied.**
- y. September 21, 1999 – For cause interview of a contractor seeking unescorted access. The contractors disclosed multiple criminal convictions. Contractor disclosed use of marijuana and cocaine within the previous month. No evidence provided of rehabilitation. **Unescorted access was denied.**
- z. September 22, 1999 – For cause interview of a contractor seeking unescorted access. The contractors disclosed a recent DUI conviction. Contractor provided proof of rehabilitation. The contractor agreed to accelerated FFD testing and was granted unescorted access.
- aa. September 22, 1999 – For cause interview of a contractor seeking unescorted access. The contractor disclosed a pending DUI charge. During interview the contractor also disclosed a February 1999 positive drug test for valium and cocaine which was omitted from the affidavit. **Unescorted access was denied.**
- bb. September 23, 1999 – For cause interview of an employee who disclosed multiple DUI offenses and a 1997 positive drug test. Investigation revealed the employee was not properly licensed and had attempted to mislead security and supervision. **Unescorted access was denied.** On October 11, 1999, the employee tested positive for cocaine on a drug test and was subsequently terminated.
- cc. September 24, 1999 – For cause interview of an employee based upon recent DUI conviction. The employee provided proof of rehabilitation. The employee agreed to accelerated FFD testing and was granted unescorted access.
- dd. September 24, 1999 – For cause interview of a contractor seeking unescorted access based upon a September 1998 positive drug test for marijuana and disclosed criminal history. No evidence provided of rehabilitation. **Unescorted access was denied.**
- ee. September 27, 1999 – For cause interview of employee based upon a DUI arrest. Following completion of a psychological interview and agreement for accelerated FFD testing the employee was granted unescorted access.
- ff. September 27, 1999 – For cause interview of a contractor seeking unescorted access. The contractor disclosed a criminal history and acknowledged being a recovering alcoholic. The contractor completed psychological testing and agreement for accelerated FFD testing. Unescorted access was granted.
- gg. September 28, 1999 – General team sweep of Chemistry Count Room, laboratory, and parking lot areas. No drugs found or forensic samples taken.
- hh. September 30, 1999 – For cause interview of a contractor seeking unescorted access who disclosed multiple DUI offenses. Contractor provided proof of rehabilitation. The contractor agreed to accelerated FFD testing and was granted unescorted access.
- ii. October 1, 1999 – For cause interview of contractor based upon DUI arrest. The contractor had been previously interviewed due to three prior DUI convictions. Unescorted access had been granted with agreement for accelerated FFD testing. Due to most recent arrest,

- l. September 8, 1999 – For cause interview of contractor seeking unescorted access. The contractor disclosed multiple arrests and convictions. Contractor disclosed using marijuana in June 1999. No evidence provided of rehabilitation. **Unescorted access was denied.**
- m. September 9, 1999 – For cause interview of contractor who disclosed two pending alcohol-related charges, i.e., DUI and Disorderly Conduct. Contractor also admitted alcohol-related relapse. **Unescorted access was denied.**
- n. September 10, 1999 – For cause interview of a contractor seeking unescorted access. The contractor disclosed a 1985 conviction for interstate distribution of controlled dangerous substances. Contractor provided proof of expunction order and proof of rehabilitation. The contractor agreed to accelerated FFD testing and was granted unescorted access.
- o. September 10, 1999 – For cause interview of a contractor seeking unescorted access. The contractor disclosed a 1996 conviction for possession of cocaine. Contractor claimed the cocaine was not his and pled guilty to avoid trial costs. The contractor agreed to accelerated FFD testing and was granted unescorted access.
- p. September 10, 1999 – For cause interview of a contractor seeking unescorted access. The contractor disclosed a 1996 positive drug test and multiple DUI arrests. The contractor provided proof of rehabilitation. The contractor agreed to accelerated FFD testing and was granted unescorted access.
- q. September 13, 1999 – For cause interview of a contractor seeking unescorted access. The contractor disclosed pending charges for possession with intent to deliver cocaine and four previous convictions for possession of marijuana. No evidence provided of rehabilitation. **Unescorted access was denied.**
- r. September 17, 1999 – For cause interview of a contractor seeking unescorted access. The contractors disclosed that in 1993 the State of Georgia classified him as an habitual offender for driving under the influence. The contractor had completed required alcohol counseling for drivers license restoration. The contractor agreed to accelerated FFD testing and was granted unescorted access.
- s. September 20, 1999 – For cause interview of a contractor seeking unescorted access. The contractors disclosed multiple DUI convictions. Contractor provided proof of rehabilitation. The contractor agreed to accelerated FFD testing and was granted unescorted access.
- t. September 20, 1999 – For cause interview of contractor suspected of adulterating pre-access urine sample. Contractor denied adulteration, but admitted to smoking marijuana in July 1999. **Unescorted access was denied.**
- u. September 20, 1999 – For cause interview of contractor suspected of adulterating pre-access urine sample. Contractor denied adulteration, but subsequently tested positive for marijuana. **Unescorted access was denied.**
- v. September 20, 1999 – For cause interview of a contractor seeking unescorted access. The contractors disclosed 1998 positive test for cocaine. No evidence provided of rehabilitation. **Unescorted access was denied.**
- w. September 20, 1999 – For cause interview of a contractor seeking unescorted access. The contractors disclosed multiple DUI convictions. During the interview the contractor disclosed additional pending DUI charges in Florida and possible bench warrant. Security verified a bench warrant had been issued. **Unescorted access was denied.**

contractor advised he was going to check himself into alcohol rehabilitation program. **Unescorted access was denied.**

- jj. October 5, 1999 – Investigation initiated upon the discovery of a syringe in men's bathroom. The syringe was forwarded for laboratory analysis on October 6, 1999. On October 12, 1999, Security was notified that the laboratory analysis identified insulin in the syringe.
- kk. October 11, 1999 – General team sweep of Administration Building, 3rd floor, and Seal Team Muster Area. No drugs found or forensic samples taken.
- ll. October 25, 1999 – General team sweep of Peach Bottom parking lot. No drugs found or forensic samples taken.
- mm. November 2, 1999 – For cause interview of contractor based upon self-disclosed criminal history. Contractor admitted that most recent (April 1998) arrest for aggravated assault with a weapon was drug and alcohol-related. Contractor had completed drug and alcohol counseling in 1989. Contractor acknowledged continuing treatment. **Unescorted access denied.**
- nn. November 2, 1999 – For cause interview of contractor based upon a DUI arrest. Contractor submitted to psychological interview and agreed to accelerated FFD testing. Unescorted access initially suspended was reinstated.
- oo. November 11, 1999 – For cause interview of contractor for DUI arrest. Contractor admitted to charges of driving under the influence of marijuana. Subsequent investigation revealed the contractor failed to disclose that he was also charged with possession of marijuana. **Unescorted access denied.**
- pp. December 2, 1999 – For cause interview of contractor based upon self-disclosed criminal history record. Contractor admitted smoking marijuana three weeks ago. **Unescorted access denied.**
- qq. December 20, 1999 – General team sweep of Site Management Building, 3rd floor. No drugs found or forensic samples taken.

II. Management Actions

During the period, one (1) employee tested positive on a random test at PBAPS. Unescorted access was suspended, the employee was referred to the Employee Assistance Program, and subsequently returned to duty. During the period, eleven (11) PBAPS contractor employees tested positive (i.e., ten (10) pre-access, and one (1) random). The contractor employees were denied unescorted access.

III. Events Reported Under 10 CFR 26.73

There were no significant FFD event reported by PBAPS during the period.

IV. Audits/Inspections

During the period the annual Nuclear Quality Assurance audit was conducted. The assessment found that the PECO Energy FFD program is being effectively implemented, in accordance with 10 CFR Part 26. The report cited as effective elements the on-site screening process, the use of a suspicion-based process for pernicious adulterant-potassium nitrite and the laboratory's strategy

for dealing with a commercially available adulterant which is marketed to drug users as a way to mask the presence of marijuana metabolites in urine specimens.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and Limerick Generating Station (LGS).

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

PECO Energy has elected to temporarily suspend access for individuals as permitted by 10 CFR 26.24(d).

During the previous 6-month reporting period (i.e., January - June 1999), 100% of the specimens which were presumptive positive for cocaine as a result of preliminary on-site screening tests were subsequently reported as positive by the HHS-certified laboratory. The confirmation rate for marijuana was 66.7%. Therefore, in accordance with 10 CFR 26.24(d) actions could only be taken during this reporting period on specimens which were presumptive positive for cocaine.

During the current reporting period, sixteen (16) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and LGS. Thirteen (13) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the thirteen (13) specimens as positive. Four (4) other specimens submitted directly to the HHS-certified laboratory for special processing due to dilution, suspected adulteration or tampering, were also reported and verified as positive by the Medical Review Officer. No action was taken based upon an unconfirmed presumptive positive test for marijuana.

During the current reporting period, four (4) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS and LGS. The four (4) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the four (4) specimens as positive. One (1) other specimen submitted directly to the HHS-certified laboratory for special processing due to dilution, suspected adulteration or tampering, was also reported and verified as positive by the Medical Review Officer. Of the four (4) specimens reported as presumptive positive as a result of on-site screening, three (3) were for pre-access testing. Unescorted access was temporarily suspended in the case of the fourth individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received.

NOTE: The number of specimens reported as positive is different from the number of individuals reported as positive due to the collection of multiple specimens in certain situations or as a result of specimens in which more than one drug was identified.

Reduced Marijuana Cut-off Level

During the period, twelve (12) individuals provided fourteen (14) specimens which were confirmed positive for marijuana at PBAPS. It is estimated that only three (3) of the specimens would have tested positive using the 100 ng/ml immunoassay cut-off level.

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

| | |
|--|---|
| PECO Energy Company | December 31, 1999 |
| Company | 6 Months Ending |
| Limerick Generating Station | |
| Location | |
| David M. Sarley | 215 841-5703 |
| Contact Name | Phone (include area code) |
| Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26 | |
| Marijuana 50 / 15 | Amphetamines 1000 / 500 _____ / |
| Cocaine 300 / 150 | Phencyclidine 25 / 25 _____ / |
| Opiates 300 / 300 | Alcohol (% BAC) 0.04 _____ / |

| Testing Results | | Licensee Employees | | Long-Term Contractor Personnel | | Short-Term Contractor Personnel | |
|---------------------------------------|-------------------|--------------------|------------|--------------------------------|------------|---------------------------------|------------|
| | | # Tested | # Positive | # Tested | # Positive | # Tested | # Positive |
| Average Number with Unescorted Access | | 2220 | | | | 1349 | |
| Pre-Access | | 104 | 0 | | | 326 | 4 |
| For Cause | Post accident | 3 | 0 | | | 11 | 0 |
| | Observed behavior | 0 | 0 | | | 1 | 0 |
| Random | | 226 | 1 | | | 162 | 0 |
| Follow-up | | 18 | 0 | | | 30 | 0 |
| Other | | 21 | 0 | | | 1 | 0 |
| Total | | 372 | 1 | | | 531 | 4 |

ATTACHMENT 2

Limerick Generating Station

Units 1 and 2

Fitness-for-Duty Performance Data

July 1999 through December 1999

Attachment 2
Summary of Data Analysis and Management Actions
Limerick Generating Station
July – December 1999

I. Initiatives Taken

The following summarizes the results of sweeps conducted during the period by PECO Energy Company's drug sniffing canine teams as well as investigations and interviews used to confirm information about illicit activities at Limerick Generating Station (LGS).

- a. July 22, 1999 – Random drug dog sweep of the Kemper Building within the LGS Protected Area. No drugs or forensic samples taken.
- b. September 16, 1999 – For cause test of contractor who submitted a suspicious urine sample on a pre-access FFD test. The interview elicited an admission by the contractor to intentionally adulterating the urine sample in an attempt to conceal the presence of a controlled substance. **Unescorted access denied.**
- c. September 28, 1999 – For cause interview of contractor who was identified to have a detectable alcohol level less than 0.04 on pre-access FFD screening. The interview elicited an admission by the contractor of recent heavy alcohol use. Unescorted access was withheld for 24 hours.
- d. November 18, 1999 – For cause interview of contractor who was involved in an off site alcohol-related arrest. Interview elicited an admission of an arrest for DUI. Unescorted access suspended pending further medical evaluation.
- e. November 22, 1999 – Random drug dog sweep of the Site Management Building, document Services area, outside the protected area. No drugs or forensic samples taken.

II. Management Actions

During the period, four (4) LGS contractor employees were denied unescorted access based upon pre-access positive tests.

During the period, one (1) PECO LGS employee tested positive on a random test. Unescorted access was denied, the employee was referred to the Employee Assistance Program, and subsequently reinstated.

III. Events Reported Under 10 CFR 26.73

During the period there were no significant FFD events reported by telephone under 10 CFR 26.73 by LGS.

IV. Audits/Inspections

During the period the annual Nuclear Quality Assurance audit was conducted. The assessment found that the PECO Energy FFD program is being effectively implemented, in accordance with 10 CFR Part 26. The report cited as effective elements the on-site screening process, the use of a suspicion-based process for pernicious adulterant-potassium nitrite and the laboratory's strategy for dealing with a commercially available adulterant which is marketed to drug users as a way to mask the presence of marijuana metabolites in urine specimens.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both LGS and PBAPS.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

PECO Energy has elected to temporarily suspend access for individuals as permitted by 10 CFR 26.24(d).

During the previous 6-month reporting period (i.e., January - June 1999), 100% of the specimens which were presumptive positive for cocaine as a result of preliminary on-site screening tests were subsequently reported as positive by the HHS-certified laboratory. The confirmation rate for marijuana was 66.7%. Therefore, in accordance with 10 CFR 26.24(d) actions could only be taken during this reporting period on specimens which were presumptive positive for cocaine.

During the current reporting period, sixteen (16) specimens were reported as presumptive positive for marijuana as a result of on-site screening at PBAPS and LGS. Thirteen (13) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the thirteen (13) specimens as positive. Four (4) other specimens submitted directly to the HHS-certified laboratory for special processing due to dilution, suspected adulteration or tampering, were also reported and verified as positive by the Medical Review Officer. No action was taken based upon an unconfirmed presumptive positive test for marijuana.

During the current reporting period, four (4) specimens were reported as presumptive positive for cocaine as a result of on-site screening at PBAPS and LGS. The four (4) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The Medical Review Officer verified the four (4) specimens as positive. One (1) other specimen submitted directly to the HHS-certified laboratory for special processing due to dilution, suspected adulteration or tampering, was also reported and verified as positive by the Medical Review Officer. Of the four (4) specimens reported as presumptive positive as a result of on-site screening, three (3) were for pre-access testing. Unescorted access was temporarily suspended in the case of the fourth individual pending confirmation and Medical Review Officer verification. Unescorted access was subsequently denied once the Medical Review Officer verification was received.

NOTE: The number of specimens reported as positive is different from the number of individuals reported as positive due to the collection of multiple specimens in certain situations or as a result of specimens in which more than one drug was identified.

Reduced Marijuana Cut-off Level

During the period, three (3) individuals provided specimens which were confirmed positive for marijuana at LGS. It is estimated that none (0) of the specimens would have tested positive using the 100 ng/ml immunoassay cut-off level.

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

| | | |
|--|-----------|---------------------------------|
| PECO ENERGY COMPANY | | December 31, 1999 |
| Company | | 6 Months Ending |
| Peach Bottom Atomic Power Station | | |
| Location | | |
| David M. Sarley | | 215 841-5703 |
| Contact Name | | Phone (include area code) |
| Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR 26 | | |
| Marijuana | 50 / 15 | Amphetamines 1000 / 500 _____ / |
| Cocaine | 300 / 150 | Phencyclidine 25 / 25 _____ / |
| Opiates | 300 / 300 | Alcohol (% BAC) 0.04 _____ / |

| Testing Results | | Licensee Employees | | Long-Term Contractor Personnel | | Short-Term Contractor Personnel | |
|---------------------------------------|-------------------|--------------------|------------|--------------------------------|------------|---------------------------------|------------|
| | | # Tested | # Positive | # Tested | # Positive | # Tested | # Positive |
| Average Number with Unescorted Access | | 2220 | | | | 1349 | |
| Pre-Access | | 79 | 0 | | | 698 | 11 |
| For Cause | Post accident | 3 | 0 | | | 2 | 0 |
| | Observed behavior | 2 | 0 | | | 0 | 0 |
| Random | | 227 | 1 | | | 179 | 1 |
| Follow-up | | 40 | 0 | | | 52 | 0 |
| Other | | 8 | 0 | | | 2 | 0 |
| Total | | 359 | 1 | | | 933 | 12 |

Breakdown of Confirmed Positive Tests for Specific Substances

| | Marijuana | Cocaine | Opiates | Amphetamines | Phencyclidine | Alcohol | Refusal to Test | 1 | 2 | 3 | 4 | 5 | |
|------------------------|-----------|---------|---------|--------------|---------------|---------|-----------------|---|---|---|---|---|----------|
| Licensee Employees | 1 | 0 | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Long-Term Contractors | | | | | | | | | | | | | |
| Short-Term Contractors | 12 | 2 | 0 | 0 | 0 | 0 | 0 | | | | | | |
| Total | 13 | 2 | 0 | 0 | 0 | 0 | 0 | | | | | | A 15* |

*Substances greater than tests reported positive due to multiple substances identified

ATTACHMENT 3

Corporate and PECO Nuclear Headquarters

Fitness-for-Duty Performance Data

July 1999 through December 1999

Attachment 3
Summary of Data Analysis and Management Actions
Corporate and PECO Nuclear Headquarters
July – December 1999

I. Initiatives Taken

The following summarizes the results of sweeps conducted during the period by PECO Energy Company's drug sniffing canine teams as well as investigations and interviews used to confirm information about illicit activities at PECO Energy Corporate and Nuclear Headquarters.

July 22, 1999 – Random canine team sweep of Corporate Testing and Labs facility. No drugs or forensic samples taken.

II. Management Actions

There were no positive tests reported at the Corporate or Nuclear Group Headquarters during the period.

III. Events Reported Under 10 CFR 26.73

There were no events reported during the period.

IV. Audits/Inspections

During the period the annual Nuclear Quality Assurance audit was conducted. The assessment found that the PECO Energy FFD program is being effectively implemented, in accordance with 10 CFR Part 26. The report cited as effective elements the on-site screening process, the use of a suspicion-based process for pernicious adulterant-potassium nitrite and the laboratory's strategy for dealing with a commercially available adulterant which is marketed to drug users as a way to mask the presence of marijuana metabolites in urine specimens.

V. Random Testing Rate

PECO Energy maintains separate testing "pools" for employees and contractors. Random testing is conducted at an annualized rate of 50%. The "average number with unescorted access" includes personnel granted unescorted access at both PBAPS and LGS.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

Specimens collected at the Corporate and PECO Nuclear Group Headquarters are forwarded directly to the HHS-certified laboratory for testing. On-site screening is not conducted.

Reduced Marijuana Cut-off Level

There were no positive tests for marijuana during the period.