



February 28, 2000

C0200-05  
10 CFR 26.71(d)

Docket Nos: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Stop O-P1-17  
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2  
10 CFR PART 26, FITNESS FOR DUTY PROGRAM

In accordance with 10 CFR 26.71(d), Fitness for Duty Program, this submittal represents the Donald C. Cook Nuclear Plant fitness for duty program performance data for the six-month period from July 1, 1999, to December 31, 1999. Attached are performance data sheets that include statistics on the various categories of testing, substances for which testing is conducted, and a summary of management actions.

Should you have any questions, please contact Mr. Robert C. Godley, Director of Regulatory Affairs, at (616) 466-2698.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. P. Powers', written in a cursive style.

R. P. Powers  
Vice President

/dms

Attachment

c: J. E. Dyer  
MDEQ – DW & RPD, w/o attachment  
NRC Resident Inspector  
R. Whale

TESTING CATEGORIES AND SUBSTANCES

The following is offered as an explanation for information outlined in the performance data report regarding the various categories of testing and the substances for which testing is conducted:

Long-term contractor personnel – plant protection contractors

Short-term contractor personnel – all contractor personnel other than plant protection

Marijuana confirmed positives noted on page two of the performance data report are reported as:

- nine positives for short-term contractor personnel at Donald C. Cook Nuclear Plant's (CNP) more conservative cut-off level (50 ng/ml), and
- twelve positives for short-term contractor personnel and one positive for long-term contractor at CNP's suspect level (20 ng/ml).

Of the total positive tests reported, thirty-one were the result of pre-access applicant tests (thirty with positive results and one deemed positive based on an adulterated sample), seven for-cause tests, three random testing (two positive results and one deemed positive based on adulterated specimen), and two follow-up test.

A total of fifty tests were reported as positive on the "Breakdown of Confirmed Positive Tests for Specific Substances."

**FITNESS FOR DUTY PROGRAM  
PERFORMANCE DATA  
PERSONNEL SUBJECT TO 10CFR26**

<u>Indiana Michigan Power Co.</u>	<u>12/31/99</u>
Company	6 Month Ending
<u>Cook Nuclear Plant, Bridgman, Michigan</u>	
Location	
<u>K.E. Burkett</u>	<u>(616)466-3335</u>
Contact Name	Phone
Cutoffs: Screen/Confirmation (ng/ml) <input type="checkbox"/> Appendix A to 10CFR26	
Marijuana 50/15	Amphetamine 1000/500 <u>N/A</u> <u>N/A</u>
Cocaine 300/150	Phencyclidine 25/25 <u>N/A</u> <u>N/A</u>
Opiates 300/300	Alcohol (%BAC) 0.04% <u>N/A</u> <u>N/A</u>

Testing Results	Licensee Employees		Long-Term Contractor Personnel		Short-Term Contractor Personnel	
	# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Average Number with Unescorted Access	1255		141		2072	
Pre-Access	131	1	72	1	1810	29
For-Cause Post Accident	2	0	2	0	6	0
For-Cause Observed Behavior	3	0	3	1	15	6
Random	341	0	29	0	516	3
Follow-Up	22	0	3	0	141	2
Other	7	0	1	0	5	0
<b>Total</b>	<b>506</b>	<b>1</b>	<b>110</b>	<b>2</b>	<b>2493</b>	<b>40</b>

## BREAKDOWN OF CONFIRMED POSITIVE TESTS FOR SPECIFIC SUBSTANCES

	Marijuana		Cocaine	Opiates	Amphetamines	Phencyclidene	Alcohol	Refusal To Test	Marijuana Suspect Specimen	Adulterated Specimen
	50	100								
Licensee Employee	0	0	0	0	0	0	1	0	0	0
Long-Term Contractors	0	0	0	0	0	0	1	0	1	0
Short-Term Contractors	9	8	3	1	1	0	10	1	12	2
<b>Total</b>	<b>9</b>	<b>8</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>12</b>	<b>1</b>	<b>13</b>	<b>2</b>

Total Confirmed Positive Tests For All Specific Substances, Refusals to Test and Adulterated Specimens: 50

**MANAGEMENT ACTIONS:**

Meetings are conducted with laboratory, collection site, Medical Review Officer(s), Employee Assistance Program staff, and psychological assessment personnel to assure consistent and effective implementation of the fitness for duty (FFD) program.

The high number of pre-access positive results is attributed to the CNP's "suspect specimen" process, and the large number of contractor personnel in-processing. Specimens collected and deemed "suspect specimens" are tested at a lower cut-off level. Observed behavior in the collection facility, specimen temperature out of range, and collection site specific gravity test results out of range are some of the bases for identifying a "suspect specimen" and considering whether a particular individual may have altered or substituted a urine specimen. A second specimen is obtained under direct observation, as applicable, and both specimens are tested at the "suspect specimen" cut-off level. Actions and sanctions taken as a result of positive test results are performed in accordance with FFD regulatory requirements.

The canine program continues to be a constant reminder to plant personnel of CNP's commitment to maintain a drug free work environment. The canine unit provides anti-drug presentations to local schools and other community organizations in addition to regular tours of CNP property. The canine unit is also made available to local law enforcement agencies, upon request.

**APPEALS:**

Four appeals were received during this reporting period. The appeal process at CNP provides notice and an opportunity to provide additional information for an impartial management review. The appeals for these individuals were denied based on failure to provide sufficient mitigating circumstances or evidence showing why the denial determination was incorrect.

**EVENTS:**

There were no events identified as reportable in accordance with 10 CFR 26.73 during this reporting period.

**TEMPORARY SUSPENSIONS:**

No temporary suspensions or administrative actions were taken against individuals based on on-site presumptive positive drug results.

Indiana Michigan Power Company continues to perform annual random testing at a rate equal to or exceeding fifty percent of the total population.