



PECO ENERGY

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

February 27, 1996

Docket Nos. 50-277
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NPF-39
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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Fitness-for-Duty Program Performance Data for
the Period July 1995 through December 1995

Gentlemen:

As required by 10CFR26.71(d), this letter submits the performance data for our Fitness-for-Duty (FFD) program for the period July 1995 through December 1995. The data for our Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, and Limerick Generating Station (LGS), Units 1 and 2, sites are provided in Attachments 1 and 2. Data for our Corporate Office and PECO Nuclear Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA, and 955-65 Chesterbrook Boulevard, Wayne, PA, respectively) are provided in Attachment 3.

The data are 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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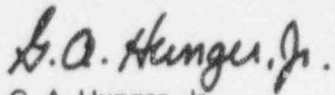
Attachments 1, 2, and 3 also include the following.

- 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 events reported to the NRC in accordance with 10CFR26.73.

If you have any questions or require additional information, please contact us.

Very truly yours,



G. A. Hunger, Jr.
Director - Licensing

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC (w/ attachments)
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS (w/ attachments)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ attachments)

ATTACHMENT 1

Peach Bottom Atomic Power Station

Units 2 and 3

Fitness-for-Duty Performance Data

July 1995 through December 1995

Attachment 1
Summary of Data Analysis and Management Actions
Peach Bottom Atomic Power Station
July - December 1995

I. Initiatives Taken

The following summarizes the results of sweeps conducted 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) during the period.

- a. July 20, 1995 - General team sweep outside operator's office area. Results: Six activations. Unidentified pills found in a plastic bag. Employee interviewed. Analysis indicated the pills were over-the-counter medication.
- b. July 27, 1995 - For cause team sweep of a contractor's private vehicle. Results: Three activations. Canine responded to empty plastic bag found in vehicle; investigator discovered empty alcoholic beverage containers. Contractor admitted his friends had used marijuana in the vehicle and that he had also used marijuana in the past. **Contractor denied unescorted access.**
- c. August 10, 1995 - For cause search (no dog used) of a contractor's private vehicle based upon detectable breath alcohol. Search revealed no alcoholic beverage containers. In a subsequent interview, the contractor admitted to excessive alcohol consumption, as well as two previous DUI arrests. This information was provided to PECO Energy Occupational Health and Safety. **Contractor denied unescorted access.**
- d. August 17, 1995 - For cause search of contractor's private vehicle. Results: Four activations. Discovered an unidentified pill inside an empty film canister. Contractor denied drug use, however, revealed his friends had smoked marijuana in the vehicle. Contractor admitted to using prescription medication without a valid prescription. Analysis of the pill indicated an over-the-counter medication. **Contractor denied unescorted access.**
- e. August 24, 1995 - For cause team sweep of contractor's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Contractor disclosed previous termination (1989) from oil refinery due to positive alcohol test. This information was provided to PECO Energy Occupational Health and Safety. Contractor granted access and placed on accelerated testing.
- f. August 31, 1995 - General team sweep of Maintenance Tool Room, North Issue Counter and Receiving Area. Results: No activations.
- g. August 31, 1995 - For cause team sweep of contractor's private vehicle. Results: Three activations. No drugs found or forensic samples taken. Contractor admitted past drug use and recent association with drug users. **Contractor denied unescorted access.**
- h. September 7, 1995 - For cause team sweep of contractor's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Contractor admitted cocaine use within past year. **Contractor denied unescorted access.**

- i. September 7, 1995 - For cause team sweep of a contractor's private vehicle. Results: Two activations. No drugs found or forensic samples taken. Contractor admitted cocaine and marijuana use within the past month. **Contractor denied unescorted access.**
- j. September 8, 1995 - For cause team sweep (no dog used) of employee's private vehicle based upon a previous positive alcohol test. No alcoholic beverage containers found. **Medical restriction removed and unescorted access reinstated.**
- k. September 12, 1995 - For cause team sweep of a contractor's private vehicle based following a positive alcohol test. Results: Two activations. No alcoholic beverage containers found, however, suspected drug paraphernalia found in vehicle. Vehicle was owned by another individual seeking unescorted access. **Contractor denied access based upon positive alcohol test.**
- l. September 12, 1995 - For cause team sweep of a contractor's private vehicle. Results: Two activations. Suspected drug paraphernalia discovered in vehicle. Contractor denied drug use, however, admitted his friends had smoked marijuana in the vehicle this past spring. Manager, FFD, advised and requested to perform additional testing based upon the discovery. HHS-certified laboratory reported detectable levels of marijuana. **Contractor denied unescorted access.**
- m. September 13, 1995 - For cause team sweep (no dog used) of a contractor's private vehicle following a positive alcohol test. Search was negative for any alcoholic beverages or containers. Contractor admitted excessive alcohol consumption prior to reporting to work. **Contractor denied unescorted access.**
- n. September 13, 1995 - For cause team sweep of a contractor's friends vehicle. Results: No activations. Contractor admitted to borrowing the vehicle due to known use of narcotic canines by PECO Energy. Contractor admitted recent drug use including marijuana, cocaine, methamphetamine and "magic mushrooms" (hallucinogens). **Contractor denied unescorted access.**
- o. September 18, 1995 - For cause team sweep of a contractor's private vehicle based upon alcohol-related concerns. Results: No activations
- p. September 22, 1995 - Management requested canine sweep of a contractor's tool trailer which was acquired from a non-nuclear site. Results: Multiple activations. No drugs found or forensic samples taken.
- q. October 22, 1995 - General team sweep of the Low Level Radwaste Storage Facility. Results: One Activation. No drugs found or forensic samples taken.
- r. November 19, 1995 - Suspected drug paraphernalia discovered at the Training Building Annex parking lot. Results: One activation. Suspected paraphernalia was confiscated. No employees or contractors implicated. The parking lot is also used by the general public for fishing.
- s. November 21, 1995 - General team sweep of Construction Trailers within the Protected Area and the owner controlled area. Results: Three activations. No drugs found or forensic samples taken.

- t. December 29, 1995 - General team sweep of Receiving Building and two delivery trucks. Results: Two activations in the building. No drugs found or forensic samples taken.

II. Management Actions

During the period, one PECO Energy employee tested positive at PBAPS based upon a For Cause test. The employee was denied unescorted access. The employee was provided treatment and rehabilitation through the PECO Energy Employee Assistance Program. The employee was subsequently discharged.

During the period, twenty-nine contractor employees (i.e., twenty-four pre-access and five for cause) tested positive at PBAPS. Unescorted access was denied for all twenty-nine contractor employees.

III. Events Reported Under 10 CFR 26.73

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

IV. Audits/Inspections

The annual FFD audit was conducted by Nuclear Quality Assurance personnel during the period. The audit found that the FFD program is being effectively implemented, in accordance with 10 CFR Part 26. Strengths were identified in the following areas:

Strong performance of collection and on-site testing staff during high volume, pre-outage conditions.

Medical Review Officer qualifications.

Effective management oversight of the testing process.

One Deviation-level Corrective Action Request was issued as a result of the Audit. The Deviation concerned an overdue background investigation and an overdue psychological evaluation for two sample collection personnel. The FFD rule requires that background checks and psychological evaluations be completed every three years for persons who administer the FFD program, including collection site personnel. Immediate corrective actions were initiated, and both conditions were resolved before completion of the audit.

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

On-site screening error

On Wednesday, September 20, 1995, a specimen collected for pre-access screening was tested and reported as "Negative" by the on-site testing facility. The specimen was included in the group of 10% negative quality control specimens forwarded to the HHS-certified for testing.

Late on Friday, September 22, 1995, the HHS-certified laboratory reported the specimen as "positive for marijuana metabolites." The positive report was retrieved from the printer at approximately 8 am on Monday, September 25, 1995, the discrepancy noted, and the Manager, FFD was notified.

After determining that the individual had not been granted access, an investigation into the testing of the specimen was initiated. The HHS-certified laboratory was directed to rerun the specimen. All other specimens collected and screened at the on-site screening facility on the 20th were transported to the HHS-certified laboratory for screening. The results indicated no other discrepancies. An aliquot of the original sample was also sent back to the on-site facility for reanalysis. The results of the re-analysis by the on-site facility were positive for cannabinoids.

Inspection of the specimen by personnel at the HHS-certified laboratory identified a large amount of sediment in the specimen container which had appeared to clump at the bottom. Microscopic evaluation of a sample of the sediment indicated "red/amber crystals consistent in morphology with uric acid."

It is believed that during the initial on-site screening, a large amount of the sediment was injected into the analyzer probe causing the inaccurate readings.

A review of the on-site screening records indicated all controls and calibrators were within the designated tolerances. The on-site Syva ETS report for the specimen in question, revealed values greater than 20% lower than the negative controls for all substances. An extensive study of results from the on-site facility showed that greater than 95% of all negative specimens have values within 10% of the negative control.

As a result of these findings the procedures have been revised to direct that any specimen with values greater than 10% lower than the negative control for any of the five substances will be centrifuged and re-analyzed. If the value for any of the five substances continues to be greater than 10% lower than the negative control, the specimen will be sent to the HHS-certified laboratory for analysis.

Actions Taken based upon Unconfirmed On-site Screening

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

During the previous 6-month reporting period, (i.e., January - July 1995), 100 percent of the specimens which were determined to be presumptively 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 less than the required 85 percent, therefore, no action was taken on specimens identified as presumptive positive for marijuana.

During this reporting period there were sixteen specimens which were identified as presumptive positive for marijuana as a result of on-site screening. Fourteen of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The MRO verified the fourteen specimens as positive. Administrative actions were not taken until after the MRO determinations and only against the individuals with the confirmed positive tests.

Reduced Marijuana Cut-off Level

During the period, there were nineteen confirmed positive tests for marijuana at PBAPS. None of the specimens would have tested positive using the 100 ng/ml immunoassay cut-off level. (Some specimens are sent directly to the HHS-laboratory without on-site screening.)

Contractor Information

The following information regarding contractor positive tests is provided:

<u>Craft</u>	<u>Vital/Protected Area Access</u>	<u>Long/Short Term</u>
Laborer	Vital Granted	Short
Turbine Tech	Vital Requested	Short
Boilermaker	Vital Granted	Short
Laborer	Vital Requested	Short
Pipefitter	Vital Requested	Short
Pipefitter	Vital Requested	Short
Laborer	Vital Requested	Short
Laborer	Vital Requested	Short
Laborer	Vital Requested	Short
Custodial	Protected Requested	Short
Specialty Vendor	Vital Requested	Short
Pipefitter	Vital Requested	Short
Laborer	None Requested	Short
Pipefitter	None Requested	Short
Specialty Vendor	Vital Requested	Short
Asbestos Worker	Vital Requested	Short
Laborer	None Requested	Short
Laborer	Vital Requested	Short
Laborer	None Requested	Short
Laborer	Vital Requested	Short
NDE/ISI Inspector	Vital Requested	Short
NDE/ISI Inspector	Vital Requested	Short
Electrician	Vital Requested	Short
Electrician	Vital Requested	Short
Pipefitter	Vital Requested	Short
Pipefitter	None Requested	Short
Diver	Protected Requested	Short
Diver	None Requested	Short
Diver	Protected Requested	Short

ATTACHMENT 2

Limerick Generating Station

Units 1 and 2

Fitness-for-Duty Performance Data

July 1995 through December 1995

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

PECO ENERGY COMPANY	DECEMBER 31, 1995
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		2360				1567	
Pre-Access		60	1			359	10
For Cause	Post accident	16	0			9	0
	Observed behavior	3	0			1	0
Random		240	1			157	0
Follow-up		48	0			17	0
Other		4	0			3	0
Total		371	2			546	10

Attachment 2
Summary of Data Analysis and Management Actions
Limerick Generating Station
July - December 1995

I Initiatives Taken

The following summarizes the results of sweeps conducted 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) during the period.

- a July 17, 1995 - General team sweep of the Administration Building, second floor. Results: Two activation. No drugs found or forensic samples taken.
- b August 30, 1995 - Pennsylvania State Police (PSP) counter-drug operation discovered marijuana growing on Company owned right-of-way adjacent to LGS. Plants were confiscated by the PSP. No employees or contractors implicated. No arrests made.
- c September 8, 1995 - General team sweep of the Sewage Treatment Facility. Results: No activations
- d October 18, 1995 - General team sweep of the Scaffold Shop. Results: No activations.
- e November 7, 1995 - General team sweep of the Technical Support Center, first floor. Results: No activations
- f December 13, 1995 - For cause team sweep of an employee's private vehicle following positive test. Results: Two activations. Forensic samples taken. Laboratory analysis proved negative. Employee was returning-to-duty following rehabilitation. **Unescorted access subsequently reinstated.**

II Management Actions

During the period, two employees (i.e., one pre-access, one random) tested positive at LGS. Unescorted access was denied both employees. The employees were referred to the Employee Assistance Program for evaluation and treatment. Unescorted access was subsequently reinstated for the employee who tested positive on the random test. The other employee was transferred to a position which did not require unescorted access.

During the period, ten contractor employees tested positive on pre-access tests at LGS. Unescorted access was denied for the ten contractor employees.

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

The annual FFD audit was conducted by Nuclear Quality Assurance personnel during the period. The audit found that the FFD program is being effectively implemented, in accordance with 10 CFR Part 26. Strengths were identified in the following areas:

Strong performance of collection and on-site testing staff during high volume, pre-outage conditions.

Medical Review Officer qualifications.

Effective management oversight of the testing process.

One Deviation-level Corrective Action Request was issued as a result of the Audit. The Deviation concerned an overdue background investigation and an overdue psychological evaluation for two sample collection personnel. The FFD rule requires that background checks and psychological evaluations be completed every three years for persons who administer the FFD program, including collection site personnel. Immediate corrective actions were initiated, and both conditions were resolved before completion of the audit.

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

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

During the previous 6-month reporting period, (i.e., January - July 1995), 100 percent of the specimens which were determined to be presumptively 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 less than the required 85 percent, therefore, no action was taken on specimens identified as presumptive positive for marijuana.

During this reporting period there were three specimens identified as presumptive positive for cocaine as a result of on-site screening. The three specimens were also screened positive and reported as confirmed positive by the HHS-certified laboratory. The MRO verified the three specimens as positive following discussion with the individuals. The three specimens were collected as part of pre-access testing, therefore the temporary suspension of access was not applicable.

During this reporting period there were eleven specimens identified as presumptive positive for marijuana as a result of on-site screening. Eight of those specimens screened positive and were reported as confirmed positive by the HHS-certified laboratory. The MRO verified the eight specimens as positive following discussion with the individuals. Administrative actions were not taken until after the MRO determinations and only against the individuals with the confirmed positive tests.

Reduced Marijuana Cut-off Level

During the period, there were eight confirmed positive tests for marijuana at LGS. Five of the specimens would not have tested positive using the 100 ng/ml immunoassay cut-off level.

Contractor Information

The following information regarding contractor positive is provided:

<u>Craft</u>	<u>Vital/Protected Area Access</u>	<u>Long/Short Term</u>
Clerical	None Requested	Short
Specialty Vendor	Protected Requested	Short
Specialty Vendor	Protected Requested	Short
Specialty Vendor	Vital Requested	Short
Technician	Vital Requested	Short
Laborer	Protected Requested	Short
Specialty Vendor	Vital Requested	Short
Diver	Vital Requested	Short
Rigger	None Requested	Short
Specialty Vendor	Vital Requested	Short

ATTACHMENT 3

Corporate and Nuclear Group Headquarters

Fitness-for-Duty Performance Data

July 1995 through December 1995

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

PECO ENERGY COMPANY		DECEMBER 31, 1995
Company		6 Months Ending
CORPORATE AND NUCLEAR GROUP HEADQUARTERS		
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		2360				1567	
Pre-Access		8	0			4	0
For Cause	Post accident	2	0			2	0
	Observed behavior	1	0			0	0
Random		69	0			13	0
Follow-up		5	0			0	0
Other		1	0			0	0
Total		86	0			19	0

Attachment 3
Summary of Data Analysis and Management Actions
Corporate and Nuclear Group Headquarters
July - December 1995

I. Initiatives Taken

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

- a. September 21, 1995 - General team sweep of the 965 Building, 3rd Floor, Nuclear Review Board, Sr. Nuclear Management, Information Systems, and Human Resources areas. Results: No activations. No drugs found or forensic samples taken.
- b. December 14, 1995 - General team sweep of the 965 Building, 2nd floor, Licensing, Fuels and Engineering areas. Results: No activations. No drugs found or forensic samples taken.

II. Management Actions

There were no positive tests reported during the period.

III. Events Reported Under 10 CFR 26.73

There were no events reported during the period.

IV. Audits/Inspections

The annual FFD audit was conducted by Nuclear Quality Assurance personnel during the period. The audit found that the FFD program is being effectively implemented, in accordance with 10 CFR Part 26. Strengths were identified in the following areas:

Strong performance of collection and on-site testing staff during high volume, pre-outage conditions.

Medical Review Officer qualifications.

Effective management oversight of the testing process.

One Deviation-level Corrective Action Request was issued as a result of the Audit. The Deviation concerned an overdue background investigation and an overdue psychological evaluation for two sample collection personnel. The FFD rule requires that background checks and psychological evaluations be completed every three years for persons who administer the FFD program, including collection site personnel. Immediate corrective actions were initiated, and both conditions were resolved before completion of the audit.

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 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 confirmed positive tests for marijuana during the period.