



PECO NUCLEAR

A Unit of PECO Energy

Station Support Department

10CFR26.71(d)

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

February 27, 1997

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 and 3
Limerick Generating Station, Units 1 and 2
Fitness-for-Duty Program Performance Data for
the Period July 1996 through December 1996

Gentlemen:

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 1996 through December 1996. 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 Nuclear Group (PECO Nuclear) Headquarters specimen collection sites (i.e., 2301 Market Street, Philadelphia, PA, and 965 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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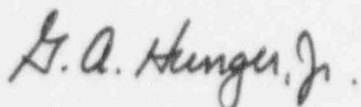
Attachments 1, 2, and 3 also include the following.

- 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: H. J. Miller, 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 1996 through December 1996

Attachment 1
Summary of Data Analysis and Management Actions
Peach Bottom Atomic Power Station
July -- December 1996

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 19, 1996 -- For cause team sweep of contractor's private vehicle. Results: One (1) activation. No drugs found or forensic samples taken. The contractor employee denied illegal drug use, but admitted associating with friends where there was "heavy pot smoking going on." On July 24, 1996, the contractor employee tested positive for marijuana. **Access denied.**
- b. July 22, 1996 -- General team sweep of contractor employees break rooms. Results: Three (3) activations. No drugs found or forensic samples taken.
- c. July 26, 1996 -- For cause search of contractor's private vehicle. Numerous alcoholic beverage containers were discovered in the vehicle. **Access denied.**
- d. August 23, 1996 -- For cause interview of contractor based upon derogatory information received during pre-access processing. Contractor admitted recent (July 1996) use of marijuana. **Access denied.**
- e. August 23, 1996 -- For cause search of contractor's private vehicle. Alcoholic beverage discovered under the passenger seat. Contractor admitted use of cocaine (May 1996), as well as previous use of marijuana. **Access denied.**
- f. August 30, 1996 -- For cause team sweep of contractor seeking to gain unescorted access. Contractor admitted to using and dealing marijuana. **Access denied.**
- g. September, 4 1996 -- For cause search (no dog used) of contractor employee's private vehicle following positive drug test. No drugs found or forensic samples taken. **Access denied.**
- h. September 5, 1996 -- For cause interview of a contractor seeking unescorted access. Contractor admitted to previous drug use and to growing marijuana for personal use. No evidence of rehabilitation. **Access denied.**
- i. September 6, 1996 -- For cause interview of contractor seeking unescorted access. Contractor admitted use of marijuana and amphetamines in 1995. No evidence of rehabilitation. **Access denied.**
- j. September 9, 1996 -- For cause search of contractor's private vehicle. Results: One (1) activation. Contractor admitted previous (1995) use of marijuana use, as well as friends smoking marijuana in his vehicle three months ago, i.e., June 1996. **Access denied.**
- k. September 10, 1996 -- For cause search of a contractor's private vehicle. Results: No activation's. Contractor disclosed positive marijuana test on June 1, 1996, but stated that the test was caused by "second hand smoke". Contractor admitted use of marijuana and that he had not completed EAP program as directed by his employer. **Access denied.**

- l. September 10, 1996 – For cause search of a contractor's personnel possessions. Results: One (1) activation. Contractor admitted use of marijuana in June 1996. Contractor failed to report for drug and alcohol testing. **Access denied.**
- m. September 11, 1996 – For cause interview of a contractor seeking unescorted access. Contractor disclosed he had smoked marijuana in August, 1996; a 1988 conviction for Criminal Conspiracy with the intent to Deliver a Controlled Substance; and, a July 1996 positive pre-employment drug test. **Access denied.**
- n. September 11, 1996 – For cause team sweep of a contractor's private vehicle. Results: Two (2) activations. Contractor admitted to drug use in 1994 and 1993 positive drug test. No evidence of rehabilitation. **Access denied.**
- o. September 12, 1996 – For cause team sweep of a contractor's private vehicle. Results: Two (2) activations. Contractor would not provide the investigators with definitive information regarding his last use of drugs. The contractor admitted to currently possessing drug paraphernalia and to allowing friends to smoke marijuana at his residence. Contractor had a 1990 conviction for Possession of Marijuana with the Intent to Deliver. **Access denied.**
- p. September 13, 1996 – For cause interview of a contractor seeking unescorted access. Contractor disclosed a 1990 conviction for Possession of Marijuana and admitted to use of marijuana in 1994. Investigator requested permission to perform a canine search on the contractor's vehicle, but was informed that the contractor had been driven to work by a coworker. Attempts to locate the coworker were unsuccessful. The contractor was directed to report to the Supervisor, Personnel Processing. The contractor failed to report as directed and also failed to report for training on September 14, 1996. Contractor's pre-access drug test was subsequently verified positive for marijuana. **Access denied.**
- q. September 27, 1996 – General team sweep of Pearl Building. Results: Two (2) activation's. No drugs found or forensic samples taken.
- r. December 5, 1996 – Contractor tested positive for alcohol on For Cause test. Contractor admitted excessive drinking and refused to allow Security personnel to search vehicle. **Access denied.**
- s. December 17, 1996 – General team sweep of the second and third floors of the Modification Building. Results: Two (2) activations. No drugs or forensic samples taken.

II. Management Actions

During the period, thirty-one (31) contractor employees (i.e., twenty-seven pre-access, one random, and three for-cause) tested positive at PBAPS. Unescorted access was denied for the thirty-one (31) contractor employees.

No PECO Energy employees tested positive during the period.

III. Events Reported Under 10 C.F.R. 26.73

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

IV. Audits/Inspections

During the period, an assessment to evaluate implementation of the Fitness-For-Duty (FFD) Program was conducted by Nuclear Quality Assurance Division personnel. The assessment found that PECO Energy's FFD program is being effectively implemented in accordance with 10 CFR Part 26. Strengths were identified in the areas of site collection and testing, alcohol testing, and overall program administration.

Three Corrective Action Requests (CARs) were identified, as follows:

1. CAR – The HHS-certified laboratory's Standard Operating Procedure (SOP) did not include current data to support the limit of detection and limit of quantification for the 6-MAM (6-AM) procedure. The SOP for the THC immunoassay did not identify the reagent manufacturer and acceptance criteria.
2. CAR – Reagent bottles on the HHS-certified laboratory's immunoassay instruments did not reflect the proper reagent lot number. The SOP did not specify that the bottles are cleaned when changing lots.
3. CAR – Three contractor FFD collection site personnel were not properly designated for inclusion in the random testing pool.

The HHS-certified laboratory has corrected the deficiencies noted. The procedure for identifying FFD personnel and including them in the random testing pool has been reviewed. Periodic reviews of contractor personnel engaged as FFD personnel will be completed to ensure proper identification.

It was also recommended that the HHS-certified laboratory lower the screening cutoff level for THC to improve the positive confirmation rate; that separate daily maintenance record forms be used for each immunoassay instrument used for on-site testing; that the alcohol calibration check record should be updated; and that a lockable box for control of donor personal effects be provided at collection sites.

The recommendations have been considered.

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 - June 1996), 100 percent 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 71.4%.

During reporting period July - December 1996, twenty-eight (28) specimens were reported as presumptive positive for marijuana as a result of on-site screening. Twenty-five (25) of those specimens screened positive and were confirmed as positive by the HHS-certified laboratory.

The MRO verified the twenty-five (25) specimens as positive. Since the confirmation rate for marijuana was less than the required 85% during the previous reporting period, no action was taken based upon a presumptive positive for marijuana.

During the reporting period July - December 1996, six (6) specimens were reported as presumptive positive for cocaine as a result of on-site screening. All six (6) specimens screened positive and were confirmed as positive by the HHS-certified laboratory. The MRO verified the six (6) specimens as positive. Of the six (6) specimens identified as presumptive positive for cocaine, one (1) was collected from an individual with unescorted access. The individual was temporarily suspended pending the confirmatory testing and MRO verification process. The specimen was subsequently confirmed and verified as positive. The individual's unescorted access was denied.

Reduced Marijuana Cut-off Level

During the period, there were twenty-five (25) confirmed positive tests for marijuana at PBAPS. Two (2) individuals tested positive on each of two (2) specimens provided. It is estimated that only six (6) 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, 1996
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		2260				1476	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access		76	0			1,325	27
For Cause	Post accident	5	0			2	0
	Observed behavior	6	0			3	3
Random		255	0			183	1
Follow-up		18	0			47	0
Other		14	0			7	0
Total		374	0			1,567	31

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	0	0	0	0	0	0	0						
Short-Term Contractors	23	6	0	0	0	4	0						A
Total	23	6	0	0	0	4	0						33

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

PECO ENERGY COMPANY <small style="text-align: center;">Company</small>	DECEMBER 31, 1996 <small style="text-align: center;">6 Months Ending</small>
LIMERICK GENERATING STATION <small style="text-align: center;">Location</small>	
DAVID M. SARLEY <small style="text-align: center;">Contact Name</small>	(215) 841-5703 <small style="text-align: center;">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		2260				1476	
Pre-Access		56	0			321	2
For Cause	Post accident	13	0			7	0
	Observed behavior	5	0			4	1
Random		242	0			141	1
Follow-up		27	0			9	1
Other		17	0			31	0
Total		360	0			513	5

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	0	0	0	0	0	0	0					
Short-Term Contractors	1	3	0	0	0	1	0					
Total	1	3	0	0	0	1	0					
												5

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ATTACHMENT 2

Limerick Generating Station

Units 1 and 2

Fitness-for-Duty Performance Data

July 1996 through December 1996

Attachment 2
Summary of Data Analysis and Management Actions
Limerick Generating Station
July -- December 1996

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 23, 1996 – General team sweep of the Site Management Building. Results: Two (2) activations. No drugs found or forensic samples taken.
- b. August 8, 1996 – Routine search by Site Security of vehicle attempting to enter the Protected Area revealed alcoholic beverages present in the vehicle. Driver and passenger submitted to for cause testing. Driver of vehicle tested positive for illegal substances. **Access denied the two contractor employees.**
- c. August 28, 1996 – For cause search (no dog used) of contractor employee's private vehicle based upon positive alcohol test. Results: No alcohol or drugs found. Subsequent Security interview confirmed that the contractor employee had consumed significant quantity of alcohol prior to scheduled work. **Access denied.**
- d. September 5, 1996 – For cause search (no dog used) of contractor employee's private vehicle based upon the contractor employees attempt to bring alcohol into the Protected Area. Results: No additional alcohol or drugs found. **Contractor employee suspended, disciplined by employer. Unescorted access subsequently reinstated.**
- e. September 18, 1996 – Unidentified white powdery substance found inside the Protected Area. Subsequent laboratory analysis determined that the substance was a non-controlled/non-prescription substance.
- f. October 2, 1996 – General team sweep of Occupational Health and Safety area in the Personnel Processing Center. Results: No activations.
- g. November 12, 1996 – General team sweep of the Training Center. Results: Two (2) activations. No drugs found or forensic samples taken.
- h. November 20, 1996 – Security investigation initiated into allegations regarding the arrest and drug use of an employee. **The employee's unescorted access was suspended for failing to report the arrest. The employee was disciplined. Unescorted access was subsequently reinstated.**
- i. November 27, 1996 – For cause search (no dog used) of contractor employee's vehicle based upon credible information that alcohol containers were in the vehicle. Results: Numerous alcohol containers were found and confiscated. **The contractor employee's unescorted access was suspended. The contractor was disciplined by his employer. Unescorted access was subsequently reinstated.**
- j. December 15, 1996 – Hypodermic needle found inside the Protected Area. Subsequent laboratory analysis indicated a non-controlled substance.
- k. December 17, 1996 – General team sweep of the Personnel Processing Center. Results: One (1) activation. No drugs found or forensic samples taken.

II. Management Actions

During the period, five (5) contractor employees (i.e., two pre-access, one random, one for cause, and one follow-up) tested positive at LGS. Unescorted access was denied the five (5) 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

During the period, an assessment to evaluate implementation of the Fitness-For-Duty (FFD) Program was conducted by Nuclear Quality Assurance Division personnel. The assessment found that PECO Energy's FFD program is being effectively implemented in accordance with 10CFR Part 26. Strengths were identified in the areas of site collection and testing, alcohol testing, and overall program administration.

Three (3) Corrective Action Requests (CARs) were identified, as follows:

1. CAR – The HHS-certified laboratory's Standard Operating Procedure (SOP) did not include current data to support the limit of detection and limit of quantification for the 6-MAM (6-AM) procedure. The SOP for the THC immunoassay did not identify the reagent manufacturer and acceptance criteria.
2. CAR – Reagent bottles on the HHS-certified laboratory's immunoassay instruments did not reflect the proper reagent lot number. The SOP did not specify that the bottles are cleaned when changing lots.
3. CAR – Three (3) contractor FFD collection site personnel were not properly designated for inclusion in the random testing pool.

The HHS-certified laboratory has corrected the deficiencies noted. The procedure for identifying FFD personnel and including them in the random testing pool has been reviewed. Periodic reviews of contractor personnel engaged as FFD personnel will be completed to ensure proper identification.

It was also recommended that the HHS-certified laboratory lower the screening cutoff level for THC to improve the positive confirmation rate; that separate daily maintenance record forms be used for each immunoassay instrument used for on-site testing; that the alcohol calibration check record should be updated; and that a lockable box for control of donor personal effects be provided at collection sites.

The recommendations have been considered.

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 - June 1996), 100 percent 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 75%.

During the reporting period July - December 1996, four (4) specimens were identified as presumptive positive for cocaine as a result of on-site screening. All four (4) of those specimens were screened positive and reported as confirmed positive by the HHS-certified laboratory. The MRO verified the four (4) specimens as positive following discussion with the individuals. Two (2) of those four (4) specimens were collected from an individual with unescorted access. The individual was temporarily suspended and subsequently denied unescorted access upon confirmation and verification by the MRO.

During the reporting period July - December 1996, three (3) specimens were identified as presumptive positive for marijuana as a result of on-site screening. One (1) of those specimens screened positive and was reported as confirmed positive by the HHS-certified laboratory. The MRO verified the specimen as positive following discussion with the individual. The specimen was collected from an individual seeking unescorted access. The individual's request for unescorted access was held in abeyance and subsequently denied upon confirmation and verification by the MRO.

Reduced Marijuana Cut-off Level

During the period, one (1) specimen confirmed positive for marijuana at LGS. It is estimated that the specimen would have tested positive using the 100 ng/ml immunoassay cut-off level.

ATTACHMENT 3

Corporate and Nuclear Group (PECO Nuclear) Headquarters

Fitness-for-Duty Performance Data

July 1996 through December 1996

Attachment 3
Summary of Data Analysis and Management Actions
Corporate and Nuclear Group (PECO Nuclear) Headquarters
July - December 1996

I. Initiatives Taken

No sweeps were conducted during the period by PECO Energy Company's drug sniffing canine teams at the Corporate or Nuclear Group (PECO Nuclear) Headquarters.

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

During the period, an assessment to evaluate implementation of the Fitness-For-Duty (FFD) Program was conducted by Nuclear Quality Assurance Division personnel. The assessment found that PECO Energy's FFD program is being effectively implemented in accordance with 10CFR Part 26. Strengths were identified in the areas of site collection and testing, alcohol testing, and overall program administration.

Three Corrective Action Requests (CARs) were identified, as follows:

1. CAR - The HHS-certified laboratory's Standard Operating Procedure (SOP) did not include current data to support the limit of detection and limit of quantification for the 6-MAM (6-AM) procedure. The SOP for the THC immunoassay did not identify the reagent manufacturer and acceptance criteria.
2. CAR - Reagent bottles on the HHS-certified laboratory's immunoassay instruments did not reflect the proper reagent lot number. The SOP did not specify that the bottles are cleaned when changing lots.
3. CAR - Three (3) contractor FFD collection site personnel were not properly designated for inclusion in the random testing pool.

The HHS-certified laboratory has corrected the deficiencies noted. The procedure for identifying FFD personnel and including them in the random testing pool has been reviewed. Periodic reviews of contractor personnel engaged as FFD personnel will be completed to ensure proper identification.

It was also recommended that the HHS-certified laboratory lower the screening cutoff level for THC to improve the positive confirmation rate; that separate daily maintenance record forms be used for each immunoassay instrument used for on-site testing; that the alcohol calibration check record should be updated; and that a lockable box for control of donor personal effects be provided at collection sites.

The recommendations have been considered.

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

PECO ENERGY COMPANY	DECEMBER 31, 1996
<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	
Average Number with Unescorted Access		2260				1476	
Categories		# Tested	# Positive	# Tested	# Positive	# Tested	# Positive
Pre-Access:		16	0			1	0
For Cause	Post accident	2	0			0	0
	Observed behavior	0	0			0	0
Random		64	0			19	0
Follow-up		12	0			0	0
Other		0	0			2	0
Total		94	0			22	0

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 FEAPS and LGS.

VI. Additional information

Actions Taken based upon Unconfirmed On-site Screening

Specimens collected at the Corporate and Nuclear Group (PECO Nuclear) 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.