

February 25, 2019

ATTN: Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville, MD 20852-2738

Reference: Reply to a Notice of Violation; IA-18-038

To Whom It May Concern:

(1) This letter describes my reason for the violation. Nothing about the reasons described below should be construed as an excuse for my actions. I accept responsibility for the consequences of the violation.

I was named the acting reactor supervisor—subsequently permanent reactor supervisor—under less than ideal circumstances. The work environment when I took over could only be described as toxic. I do not believe any of the staff at the time had positive feelings about their jobs or personnel interactions. In fact, I do not believe any of the staff enjoyed coming to work at all. Before I became the reactor supervisor, meetings were held daily where nearly a minute by minute accounting of your planned workday tasks were required, and detailed non-critical elements of our work plans were weighted over critical elements. This poor work environment had been ongoing for over 2 years at the time I took over as the reactor supervisor. This toxic environment and other issues had caused my predecessor and I to have a very poor working relationship over the last couple years of his tenure as supervisor, and I was about to switch from his employee to his boss.

One of my goals as the new supervisor was to change the overall culture within the facility. I wanted to create a more positive work environment—an environment that was more relaxed, less rigid, and just an overall better place to work. One of the things that I had anticipated, but was still not adequately prepared for, was the difficulty in changing the destructive culture when the ultimate cause of the toxic dynamic had not really changed. The negative environment made certain individual interaction difficult and group meetings tense. I know that those in leadership positions must make difficult decisions and perform difficult tasks, but instead I kept putting off sitting the staff down for reactor operator requalification training in part because I dreaded the interaction.

Topics of reactor operator requalification training had historically been taken from material covered during the Reactor Operations Committee (ROC) meetings. It was pertinent training material, and the

ROC agenda provided an easy template for training material. Before the fall 2016 ROC meeting, each of the staff reviewed the agenda material. I discussed the material from the fall 2016 ROC agenda one on one with each of the staff prior to the ROC meeting. I discussed conversations that took place during the ROC meeting with each of the staff in the days after the meeting, again on a one on one basis. There were more discussions leading up to and following this meeting as compared to a most ROC meetings because we had just received our renewed license, and we needed to ensure everyone was up to speed on the various changes. When the NRC inspector arrived in spring of 2017 to perform our annual inspection and asked for our requalification documentation, I realized that I had never held a formal training meeting. I had wanted for the training sessions to be more informal than previous training sessions, but I had not specifically planned for the informal one on one discussions that took place surrounding the fall 2016 ROC meeting to be considered the requalification training. As a new reactor supervisor in charge during his first inspection, I panicked, realizing that I had failed to plan appropriately. In my mind, I was supposed to change the dynamic, and improve the safety and efficiency of the lab. There was finally light at the end of the tunnel after working for months to improve the culture within the lab. "How could I have overlooked the training meeting?" All those thoughts and more went through my head. As I said before, I knew that I had discussed the ROC meeting materials with each staff on at least two separate occasions, although I had failed to document any of these one on one discussions. At that point, I made a very poorly thought out, snap decision. I assembled a training sheet and put one into each personnel folder for the reactor staff. The training sheet did contain inaccurate information. We did not meet on the specific date and time noted on the sheet. In that moment, I thought the discussions I had with the staff about the material included on the sheet met the intent of the requalification plan. The choice I made to inaccurately represent the training meeting was wrong. I regret that choice, and I wish I could take it back.

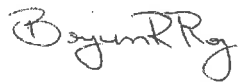
(2) Since date of the investigation, I have changed the requalification sheets, and each staff member now signs the sheet indicating their attendance. This corrective action makes training statements a multi-factor verification. I have also assembled a calendar of required tasks that are the responsibility of the reactor supervisor so that license requirements and their due dates are available in black and white. This corrective action provides an easy resource for tasks and respective due dates.

(4) Both corrective actions were instituted by January 31, 2018.

Concluding remarks:

Please realize that I am fully aware I made mistakes. None of the information I presented was an excuse of my actions. Not only am I promising to do better moving forward, I believe I have shown over the past 2 years the ability to successfully act as the reactor supervisor for this license. I am deeply embarrassed about the decisions I made, and I am hopeful to be given a second chance. I promise to do everything in my power to demonstrate that I learned from my mistakes and regain the trust of the NRC, the USGS, and ultimately the public. I promise to use a second chance opportunity to prove that I can be a great steward of the NRC license that I was entrusted to uphold.

Respectfully,



Brycen R. Roy

xc: Director, Office of Nuclear Reactor Regulation

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