

September 1, 1988

Director, Office of Enforcement  
US Nuclear Regulatory Commission  
Washington, DC 20555

ATTN: Document Control Desk

Re: Reply to a Notice of Violation  
Docket No.: 55-2492  
License No.: SOP-2321  
EA88-80

Dear Sir:

Please accept this letter as my reply to a notice of violation in compliance with 10 CFR 2.201. Throughout this proceeding, both in my conference with PECO Security Personnel and with NRC Investigators, I had admitted that during the 11:00 p.m. to 7:00 a.m. shift I was, at times, inattentive to instrumentations and controls and that I allowed myself and those under my supervision to be distracted by activities such as reading non-job related materials while on duty, reclining in a resting position with eyes closed and other activities that precluded adequate performance of licensed duties. During those conferences, however, interviewing personnel referred to numerous alleged occurrences. I do not admit to the accuracy of each and every alleged occurrence mentioned in those conferences. I will continue to stand by the accuracy of those statements that I made during those conferences. During those conferences, I also stated what I believe to be the reasons for the violations. Those reasons include the general nature of shift work, the manner in which shift work is scheduled, the monotony of routine job performance, the attitudes of high level administrators, the unavailability of adequate personnel during the midnight shift to permit employees to have sufficient breaks during that shift in order to remain fresh and alert and the lack of options available to supervisors in order to discipline employees.

With regard to the other matters required in this reply by Section 2.201(a)(1)(2) and (3), as I have retired from my employment, I do not feel as though I am in a position to accurately supply such information.

8809130072 880901  
PDR ADOCK 05000277  
G PNU

IEH  
//  
w/check \$1000  
# 178

Director, Office of Enforcement  
ATTN: Document Control Desk  
September 1, 1988  
Page 2

If further information is required, please so advise. As in the past, it is my intention to cooperate fully in order that all problems associated with this matter can be remedied.

Sincerely yours,

*Howard L Metz*

Howard L. Metz

STATE OF MARYLAND, COUNTY OF HARFORD, TO WIT:

I hereby certify that on this 2<sup>nd</sup> day of September, 1988, before me, the subscriber, a Notary Public in and for the County and State aforesaid, personally appeared HOWARD L. METZ, and he made oath in due form of law that the matters and facts set forth in the foregoing Reply to a Notice of Violation are true and correct to the best of his knowledge, information and belief.

AS WITNESS my hand and Notarial Seal.

My Commission Expires: 7-1-90

Maryanne Moore  
Notary Public

cc: Regional Administrator, U. S. Nuclear Regulatory Commission