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September 7, 1988

Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Re: Leo E. MacEntee, III
Docket No. 55-60361
License No. OP-10227-1
EA 88-18

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On August 9, 1988, I was notified that I would be charged with a Severity Level III Violation of my Reactor Operator License, and assessed a civil penalty of \$500.00. This penalty is being imposed because at times prior to March 24, 1987, I was in violation of Peach Bottom Atomic Power Station Administrative Procedure A-7, which required that I be attentive to instruments and controls within my area at all times, and that I refrain from engaging in distracting activities in the Control Room.

Please accept this as my full admission of the charge against me. I did violate paragraph 7.1.7 of Administrative Procedure A-7. During the 11:00 p.m. to 7:00 a.m. shift I did prop up my feet and close my eyes, which prevented me from being attentive to my assigned area. I also violated paragraph 7.1.8 of Administrative Procedure A-7 in that I read non-technical material on shift, and I played a computer game and a golf game while in the Control Room.

It is only too apparent that I was not giving my job the full attention that I should have. I took the easy way out. I sat around thinking I had nothing to do, so I read a magazine or played a video game. I spent all my time on shift waiting for something to happen. I never pulled myself together to put the kind of extra effort into my job that would have stopped me from violating the terms of A-7.

I came into full compliance with Administrative Procedure A-7 after shutdown. I was sent a copy of the Procedure with directions to review it. I followed that directive; however, my full comprehension of the magnitude of my deep-seated problems took months. The process was ongoing as I went through

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re-training, read highly critical reports of our activities and went through the enforcement conference on February 8, 1988.

Throughout this time I have worked on the attitude perceptions that others had of me, particularly that I was disinterested and uncaring. I began to talk more with the people on my shift so that they could sense my involvement with them. I also realized that I was not getting enough sleep. I had down-played symptoms that I should have detected, such as my irritability and inability to concentrate. I changed my sleep habits for night shift, so that I sleep until an hour and a half before the shift starts. This adjustment, the new clockwise rotation and the increase in personnel available for shift work, have all helped me considerably.

The biggest boost in my self-improvement has come from working on the Control Room modification program. Another operator and I volunteered to be part of a committee looking into control panel design, after we realized that proposed modifications were too "engineering oriented." We thought that some of their technical information was wrong, the labeling on the panels was either wrong or inconsistent and that they should evaluate changes from an Operations' perspective. Although it took some doing, we convinced the engineers to see things our way. Our faith in our abilities convinced those in design to acknowledge our input into design criteria. The reward for our assertiveness is a control panel that will decrease the likelihood of human errors.

My project focused my attention on how plant equipment affects other equipment; for example, one switch can eventually affect an entire flow path. I have been able to take this lesson back into the Control Room, realizing that the more I am involved with the Plant, the more likely I am to find small things to repair, clean or replace. I know now that taking that small step prevents a much larger problem later; for example, fixing an electrical short prevents a burning wire later on, or detecting an improper switch position can stop a later malfunction. I have found myself catching things that I do not think I would have caught before. I am pleased that I am so attuned to this now, because once restart occurs and equipment is fully functioning, there will be far more instances of equipment malfunctioning to keep me on my toes.

Looking towards the future, I would like to stay in Operations with the goal of becoming involved with operator training. I have an enormous amount of Operations experience for someone my age. Anyone can read a book to teach operators, but I would bring the deeper understanding that comes from having performed just about every job in the Operations Department.

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Finally, although I hated having to go through this, I know now that there is nothing better than trial by fire. I have been there and know firsthand what can go wrong. Someone who has something and almost loses it, values it far more than someone who has never had it. The thought of losing my license concerned me for months. Without my license, I would have lost a career that I realize now means more to me than anything. Your willingness to trust in my abilities has given me back the self-esteem I need to do the best job I can and to try to do better all the time. I am very grateful for the chance to prove to Philadelphia Electric Company the caliber of its operators and to prove to the NRC and the general public that I not only have the technical ability, but the character to do an excellent job.

Respectfully submitted,



LEO E. MacENTIRE, III

Enclosure: \$500.00 Penalty

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

