

DCS

September 7, 1988

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

Re: Andrew R. Wargo
Docket No. 55-3219
License No. SOP-2191-6
EA 88-27

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On August 9, 1988, I learned that I would be subject to a Severity Level II Violation and a proposed civil penalty of \$800.00. I was informed that the charge related to my conduct during the 11:00 p.m. to 7:00 a.m. shift when, at various times, I became inattentive to instruments and controls and allowed myself and those I supervised to violate Peach Bottom Atomic Power Station Administrative Procedure A-7.

Please accept this reply as my admission that I violated Administrative Procedure A-7. At various times I did lean back in my chair, with my feet up and my eyes closed. I permitted those I supervised to do the same. I frequently read non-job related material and I brought a tape player into the Control Room in 1986. I permitted those I supervised to read material banned by A-7 and to play a video game.

I had always read material not related to my job from the time I became a reactor operator. I did this, even though I knew it was wrong, because it was an easy way to remain alert. I engaged in other inattentive behavior, and permitted my crew to do the same, because I allowed my morale to begin to affect my job performance. I was very disappointed that I was not transferred to Limerick Generating Station; consequently, I decided on my own that certain behaviors were not "too bad" and I began to either engage in them myself, or allow my operators to engage in them. I started to believe that Control Room behavior could

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not matter that much, because I would be able to handle any technical difficulties that confronted me.

The Shutdown Order ended that fantasy. I realized I could not focus on technical competence alone, or rely on alarms and automatic actions as the first line of defense. I had the whole concept of safe operations backwards. Instead of being "back-ups," operators were supposed to be the first line of defense. In the public's eye, a shift supervisor was not supposed to be a bitter, passive individual who did what he pleased and permitted his operators to do what they pleased.

Obviously, one of my worst failings was that I allowed myself to lose control of my shift. I permitted the operators to do whatever they wanted, within certain wide boundaries; moreover, I permitted other personnel, such as test engineers, to perform work that directly affected the plant, without requiring them to explain their work to me. I reached the point where I just worked around anything or anyone who bothered me, rather than confront the situation.

I have become a much more aggressive shift supervisor now, primarily because of the switch to the Shift Manager form of leadership. My Shift Manager informed me right away that he intended to rely on my technical expertise and in return for my sharing that knowledge with him, he intended to back my suggestions, to the best of his ability. We decided that if I needed to pursue a course of action I need only take the proposition to him, and if he agreed with me, we would push that concern, together. Because he has demonstrated his support for me and shown respect for my opinion, I do a much better job. My Shift Manager's backing, as well as the apparent receptiveness of my other superiors, has given me the courage to stop a job or obtain a procedure change right in the middle of a job, without fear of censure for disrupting a schedule, or voicing an unpopular opinion.

Because I set a bad example before, I know I have to encourage those I supervise to have enough confidence in me to follow my directions. To address that issue, my Shift Manager and I conduct a one minute goal-setting session at the beginning of each shift. The reactor operators seem to respond to that very positively. I have also pushed myself to give constructive criticism to the operators when it is needed, and I have enjoyed the feeling I receive from steering someone in the right direction. I have found that if I correct someone right away, yet take the time to tell

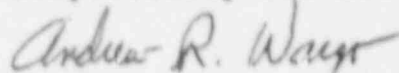
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him why he did something wrong, he is actually grateful to me.

To correct my habit of avoiding controversy I have trained myself to discuss troublesome issues with my shift-mates. For example, if I am having difficulty interpreting a procedure, I no longer hold back on the issue. I talk it over with different people until I can assess whether I am right or wrong. I try to let different opinions challenge, rather than silence me. This has become so automatic to me now, that I believe I have mastered my former problem.

My future goals include working on restoring management's confidence in me to the point where I can secure a promotion. I am determined to prove that while I once allowed the fact that others disappointed me to affect my job performance, I will never let my standards fall again. The courage I have gained to press an issue until someone listens to me, has given me the added bonus of improving my job performance. My more accessible attitude has encouraged my Shift Manager to consult with me about all parts of Operations, and my subordinates to approach me with their own concerns about ways to perform a particular task. I take pride in the fact that I am known as one of the best on-the-job trainers in the Control Room. I can assure you that I will continue to try to improve my performance and to inspire my operators to follow me along the right path.

Respectfully submitted,



Andrew R. Wargo

Enclosure: \$800.00 Penalty

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

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF *York* : SS.:
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Before me, a Notary Public, personally appeared ANDREW R. WARGO, who being duly sworn according to law deposes and says that the statements made in his Reply to Notice of Violation are true and correct to the best of his information, knowledge and belief.

Sworn to and subscribed to before me this *7* day of *Sept*, 1988.

J. Kerr Anderson
Notary Public

(SEAL)

My commission expires:

J. KERR ANDERSON, NOTARY PUBLIC
LOWER CHANCEFORD TOWNSHIP, YORK COUNTY
MY COMMISSION EXPIRES APRIL 26, 1991
Member, Pennsylvania Association of Notaries