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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: David S. Woodrow
Docket No. 55-3217
License No. SOP-3622-3
EA 88-30

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On August 9, 1988, I was served with a Notice of Violation, Severity Level II, and Proposed Imposition of Civil Penalty in the amount of \$800.00, because I participated in the inattentive behavior which required the Nuclear Regulatory Commission to suspend operation of the Peach Bottom reactors on March 31, 1987. This Reply consists of my admission of my violation of Peach Bottom Administrative Procedure No. A-7, the reasons for my violation, the immediate corrective steps that have been taken, the corrective steps that have been taken to avoid further violations, and the date when full compliance will be achieved.

As I admitted during my enforcement conference on February 17, 1988 in Aberdeen Maryland, I had engaged in a violation of Administrative Procedure A-7 over an extended period of time and I failed to exercise the control and command responsibilities expected of a shift supervisor. I read non-job related material while I was on duty, I also put my feet up, and closed my eyes. I allowed those I supervised to engage in this behavior and to play a golf game in my presence.

Although I knew this type of conduct was prohibited by the Administrative Procedure, I engaged in it because I had a lackadaisical attitude. I also had the short-sighted

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attitude that automatic safety systems would take care of any incidents that might arise in the Plant.

Since the shutdown order, I have come into compliance with Administrative Procedure A-7, because I understand fully that my job is directly on the line if I do not comply with it and enforce it. If I had directed the operators, prior to March 31, 1987, to stop violating Administrative Procedure A-7, I think they would have temporarily, but they knew I did not have the authority to discipline them in a manner that would prevent the resumption of this activity. Now, I can give an oral warning, or turn a more serious matter, such as a procedural violation, over to management.

One of the steps I have taken to prevent future violations of Administrative Procedure A-7 is to observe my men better by watching for any signs of bad behavior or any attitude problem. To do this, I take more walks around the Control Room, and I have the men make more rounds while they are on duty. I have asked my team members to let me know if they have any problems with other employees so that we can handle these problems correctly, and not with a disturbing confrontation. If a man should have a bad day before coming to work and not obtain his needed rest, I tell my team members I would like to know that before the shift begins so that we can watch out for each other. If I know this, I can obtain him a relief so that he can get some fresh air, or walk away from the console for awhile. I will also visit with him more during the shift, and I will alert the other operators to be extra watchful of him to see that he does not assume a relaxed position. I also told my team members that I would not condone any unprofessional behavior, and that I would report any improper actions to the attention of management. We understand that because we have lost our reputations we must work twice as hard to prove to the NRC, PECO, and the public that we will perform our jobs in a proper, conscientious, and professional manner.

Another corrective action I have taken, primarily because of a shortcoming that was brought to my attention during my enforcement conference, is to become better acquainted with activities at other nuclear power plants. Prior to shutdown, I had never talked to an operator from another nuclear plant, other than ones who had left the

employment of Philadelphia Electric Company. I was very pleased to be selected to visit a Canadian Nuclear Power Plant, which had a distinguished service record. I was assigned to look for pointers on a number of operational topics including shift scheduling, promotions and training. The tour was a real eye opener, and in my recently completed report to my employer I recommended the expansion of the number of individuals manning the Control Room, and the need to include more individuals for emergency electrical and maintenance work. I suggested moving from six teams to eight teams to cut down on the amount of night work and to accommodate personal scheduling changes. The experience of this trip encouraged me to keep working on my promotional goal: becoming involved in planning Operations' activities.

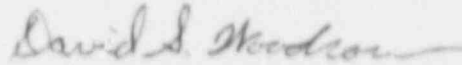
The final corrective activity I have successfully completed is my adjustment to the Shift Manager mode of operation, and my building of a strong operating team. My Shift Manager is extremely supportive. We hold conferences together to plan work for the shift, and we ask for comments and input from the rest of the team. My Shift Manager never bypasses me; also, my operators know that I will either act on their concerns or explain why I cannot. I know that we set a fine example for the rest of the Plant, because others have approached me asking to join our team.

In conclusion, I would like to state that I am in full compliance with Administrative Procedure A-7, which I understand is a part of my license requirements, and I have taken the steps outlined above to ensure that my conduct and the conduct of the operators assigned to me will not jeopardize the health and safety of the general public. There is better communication now among the operators, a better attitude towards our jobs as well as towards the other departments upon whom we must rely, and a strong desire to show that we can perform our duties in a professional manner. I wish to thank you for giving me the opportunity

Director, Office of Enforcement
September 7, 1988
Page 4

to continue as a licensed Shift Supervisor at Peach Bottom
Atomic Power Station.

Respectfully submitted,



David S. Woodrow

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 DAVID S. WOODROW, 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. Kirk Anderson
Notary Public

(SEAL)

My commission expires:

J. KIRK ANDERSON, NOTARY PUBLIC
LOWER MERCAER-GODD TOWNSHIP, YORK COUNTY
MY COMMISSION EXPIRES APRIL 26, 1991
Member, Pennsylvania Association of Notaries