

DC

September 6, 1988

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

Re: Ronald E. Sheetz
Docket No. 55-3493
License No. SOP-1011-1
EA 88-27

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

This letter is in response to the Notice of Violation which I received from Mr. James M. Taylor, dated August 9, 1988. I attach my check in the amount of \$800.00, representing the civil penalty which was imposed.

The Notice of Violation charges that for an extended and indeterminate period of time prior to March 24, 1987, I was at times inattentive to instrumentations and controls, and allowed myself and those I was required to supervise to be distracted by activities that I knew, or should have known, violated Procedure A-7. I hereby specifically admit this violation.

Prior to the March 31, 1987 Shutdown Order, I was a shift supervisor with over 20 years employment with the Philadelphia Electric Company. On some occasions while on shift, I was inattentive to my duties, this occurred generally on the back shift, from 11:00 p.m. to 7:00 a.m. in the morning. I read non-job related reading material, sat back in my chair and a few times my head dropped and I dozed for short periods of time. Nodding off was not intentional, and on those occasions when it happened I got up, walked around, had coffee and talked to my crew in order to stay awake. On one occasion, I played a hand-held video game that one of the operators brought into the Control Room. I observed others playing this game, and did nothing to stop them. To sum it up, my conduct in the Control Room was, at times, most unprofessional.

I believe one of the primary causes of this conduct prior to the Shutdown Order was a staffing problem. We worked a tremendous amount of overtime, and many nights I was absolutely exhausted. Most of the inattentiveness occurred on the back shift - usually from about 4:00 a.m. to 6:00 a.m. At this time of the

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morning it was difficult to stay alert, so I looked for other activities, such as reading to keep my mind busy. I always felt that if we had more operators, we would be able to work less overtime and would not have been so tired. This was a problem that I addressed to management many times over the years, but never got any answers. There was a constant frustration, which led to an unprofessional attitude and sloppy behavior.

Although I knew at the time that complacency has no place in the Control Room, I took no steps to take corrective action. One difficulty I had was the fact that we worked on a shift rotating basis. We did not operate as a fixed crew, and the chain of command seemed to go from the operators directly to the shift superintendent. I always felt that I did not have any direct authority over those I was supposed to supervise. Each of the superintendents operated differently - some were more lax than others, and allowed things to go on which were in violation of our "A" procedures. As the shifts rotated, the crew's behavior changed, depending on who the superintendent was.

The March 31 Shutdown Order came as a shock. It brought home to me how far the situation had gotten out of hand, and that I, as a Supervisor, bore a great deal of the responsibility. I recognized that my perceived lack of authority was not a very good reason for my failure to fulfill my responsibilities. The real reason was that I had somewhere along the way lost sight of the absolute responsibility I had under my license. I depended on others to set the standards of behavior that I should have set. I immediately decided that I would take the steps necessary to make sure, if I was able to retain my license, that this situation would never happen again.

I am still working shift work, so the problem of sometimes being tired is still there. Because I understand the seriousness of what happened, and because I am determined to live up to the responsibilities of my senior license, I am now taking steps to overcome this problem. Prior to the Shutdown Order, I came to work on the back shift many times when I was physically fatigued. I felt that I had to perform certain chores at home before I reported for work because I would not have an opportunity to do those things at home for a week or so once I went on the back shift. This is no longer the case, and in fact I make a conscious effort to be especially well rested before reporting for duty. If I am sick or not feeling well, I stay home. It is still necessary that I work a certain amount of overtime. However, this is now scheduled in advance whenever possible. I can better prepare myself physically and mentally with planned overtime than I could previously.

My new practice in the Control Room is to move around constantly, and to talk with the other operators on shift.


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Instead of checking plant instrumentation that is visible from the chair, I now get up and move to the panel. It has also become easier to stay alert on the back shift in that more jobs are being scheduled during these night hours. We are keeping busier with maintenance work, and the work load is becoming more evenly distributed over the three shifts.

I feel now that management is making a real effort to be responsive to our problems. The attitude before seemed to be that we were expected to "get the job done", regardless of the difficulties we faced. Today, I can see through my shift manager that things have changed and that this attitude no longer prevails. The new attitude is that the safety of the plant is first priority, and while we always believed that, I now sense it in management stronger than I did before.

I realize today that my conduct as a licensed operator, as a supervisor, was totally unacceptable. It is hard for me to look back and see how my performance deteriorated over the years. As a result of what happened 18 months ago, I have a new commitment, to myself and to the NRC. I am now in full compliance with the terms of my license, and intend to continue in full compliance. I have set forth in this letter some of the corrective steps I have taken to date, but I want to assure the Commission that I am going to continue to try to improve my performance every day. I made a mistake, one that I do not intend to ever repeat.

Respectfully submitted,


RONALD E. SHEETZ

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

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF *York* : SS:
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Before me, a Notary Public, personally appeared Ronald E. Sheetz, 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. Kerd Anderson
Notary Public

(SEAL)

My commission expires , 19__.

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