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September 6, 1988

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

Re: Edward S. Cromwell
Docket No. 55-4747
License No. SOP-3937-3
EA 88-07

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On August 9, 1988, the Nuclear Regulatory Commission notified me that I would be charged with a Severity Level II Violation and proposed civil penalty of \$800 for failing to carry out the responsibilities of my senior license. I admit to the charge. As stated in the Notice of Violation I was inattentive: I placed my feet up and I closed my eyes while I was on duty. I let others do the same. I read and let others read non-technical material on shift. I let people play video games, and I played one myself. I allowed horseplay and unprofessional behavior to take place in the Control Room. I did not set a good example.

I did these things partially because I did not cope well with shift work. I had a hard time adjusting to the amount of overtime I had to work. I also became indifferent to procedural compliance because my personnel grievances, such as too much overtime, were not addressed. Unfortunately, my behavior made things worse because younger operators watching me decided that it was "OK" to violate parts of Administrative Procedure A-7. I was short-sighted and never fully understood that my actions were a potential safety hazard.

As you know, Philadelphia Electric Company required me to undergo extensive re-training to guarantee to the public that I could be trusted with the safe operation of Units 2 and 3. It was brought home to me that all procedures had to be followed and that I was in charge of guaranteeing that compliance. I was told that if someone were doing something wrong I had to step in to correct the situation, forcefully. I was particularly helped by learning effective ways to tell someone when he was doing something wrong, how to be more outspoken about my opinions, and how to monitor subordinates' attitudes to prevent a similar compliance breakdown in the future.

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A Station-wide change that helped me comply with the "command and control" function of my senior license was the strong disciplinary policy instituted by Philadelphia Electric Company. I was informed that if I detected a procedural violation, I was to report it to my Shift Manager, with the full confidence that my disciplinary recommendation would be supported and implemented. I was also told that I would be fired if I did not immediately stop a procedural violation by correcting it and by reporting it through my chain of command. I understand fully that anything lacking in operational or technical value does not belong in the Control Room: this includes operators who are engaging in conduct banned by a procedure.

On a more personal basis, I have made changes in the way I prepare myself for shift work. I condition myself better for night work now and I have found that the new clock-wise shift rotation is far easier for me. I also am pleased that I do not have to work as much overtime. While standing watch, I take pains to walk around, check readings and examine what others have done. I do a lot more double-checking than I used to, and I am far more involved in all of the activities occurring in the Control Room.

Additionally, I have accepted the fact that I owe a special obligation to the operators on my shift. I have to redeem myself in their eyes, because my attitude and poor example led them into serious trouble. I try to set aside time each day to talk to them about their personal and job related concerns. I also try to set up the tasks they must complete with an eye towards making their jobs easier. I am still trying to help their motivation by praising their work and by keeping their interest in Operations on the same high level. I find that frequent discussions at the panels about what is going on and about our day-to-day tasks are a good way to accomplish this goal. I realize that I still must develop more ways to maintain interest on night shift. I am working on increasing meaningful monitoring activities in the Control Room and scheduling other constructive jobs to keep my crew alert, and to improve the quality of their performance.

To conclude, I realize that I must continue to improve my leadership skills. I have to earn back the respect of my men for subjecting them to the humiliation caused by the Shutdown Order. I believe I am slowly earning their respect back. While I am in full compliance with all procedures, I realize that I will still have to prove my dedication to safe operation for the remainder

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of the years I am licensed. I am fully prepared to devote myself to that task.

Respectfully submitted,


Edward S. Cromwell

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 Edward S. Cromwell, 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. Kern Anderson
Notary Public

(SEAL)

My commission expires , 19__.

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