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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: Frank J. Pfender, Jr.
Docket No. 55-3096
License No. SOP-2621
EA 88-77

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On August 9, 1988, I was officially notified that I would be charged with a Severity Level II Violation and a proposed civil penalty of \$1,000.00. The proposed violation and penalty resulted from behavior which subjected me to an enforcement conference on March 30, 1988. This is my explanation of my conduct, as required pursuant to 10 C.F.R. § 2.201.

The Notice of Violation which I received indicated that contrary to the provisions of my license I violated Peach Bottom Atomic Power Station Administrative Procedure A-7 entitled "Shift Operations". This Procedure provided that while I was on duty I was to remain alert and attentive to the Control Room instrumentation and to refrain from engaging in distracting activities. Because I was a Senior Licensed Operator, I was to ensure that all those under my command obeyed Administrative Procedure A-7.

Instead of carrying out this charge, I read non-technical material while I was on duty and I permitted my shift to read. As stated in the Notice of Violation this activity occurred mainly on the midnight shift, but also on some afternoon shifts. In addition to reading, I played a hand-held golf game and allowed my shift members to do the same. I also allowed individuals to play a computer video game in my presence. I permitted operators to lean back and close their eyes while they were on my shift, and I did the same thing in my office.

I must take the blame for my actions as well as those of my operators because I was in charge of the shift. I rationalized the breaking of Administrative Procedure A-7, because I did it only after shift activities were finished, when the plant was quiet. For example, I read and let others read to pass the time on the midnight shift, rather than finding something better for them to do. I never properly understood the significance of

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violating an Administrative Procedure; worse yet, I gave mixed signals to my crew as to what type of behavior was acceptable. I expected my crew to read and follow Administrative Procedure A-7, yet I broke it myself and I never held meetings to tell my shift how they should behave.

My greatest failing as a Shift Superintendent was that I stressed the technical side of my job, only. I emphasized compliance with procedures concerning starting the reactor, shutting it down and maintaining it in a safe status. I did not stress the significance of proper control room behavior. I fully understand now that by violating an Administrative Procedure myself, my shift could only assume that I did not consider it important. This was a serious failure on my part.

I currently am engaged in Electrical Preventive Maintenance. My job requires me to coordinate with the shift, the removal of circuit breakers for offsite overhaul. I suggest the particular breakers involved, and discuss with outage planning and the Shift Manager the switching required. Final approval is granted by the Shift Manager. Through this assignment, I have seen a remarkable change in the operators. Operators keep procedures in front of them now at all times. They will not do any task I request without a procedure. In fact, each operator confirms that what I have asked him to do is covered by a procedure and his supervisor comes in and confirms this, too. There is double verification for all tasks.

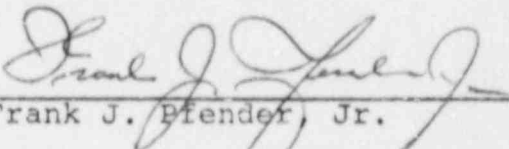
I anticipate that I will be asked to delay my request for retirement and accept the Electrical Supervisor position in the Operations Department. If this transpires, I have several goals. First, never again will our electrical equipment (breakers, valves, motors, etc.) be permitted to deteriorate to the extent that they have over the past thirteen years. Second, it is my intention to create an Electrical Operating Group composed of the best plant operators who will be dedicated to electrical problems only and third, I wish to train the best and most experienced member of the group as my eventual replacement. I believe a group of this kind will increase the likelihood of safe, reliable operations and decrease unexpected transients, isolations and scrams due to electrical ignorance.

In conclusion, I wish to state that I have not taken this matter lightly. I lost the job and respect that I worked for over the last 35 years. I have not fully recovered from the humiliation of this experience, but I want to put it behind me and become once more a valued member of the Operations Depart-

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ment. I do value the opportunity of being permitted to remain at Peach Bottom and getting on with the work that I so dearly love.

Respectfully submitted,



Frank J. Pfender, Jr.

Enclosure: \$1,000.00 Penalty

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 Frank J. Pfender, Jr., 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. Kenneth Robinson
Notary Public

(SEAL)

My commission expires , 19__.

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