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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 C. McRoberts
Docket No. 55-7558
License No. SOP-10608
EA 88-20

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On August 9, 1988, I was notified that as a result of the enforcement conference conducted with me on February 11, 1988, I would be charged with a Severity Level III Violation and a proposed civil penalty of \$500.00. The reason for this action was my violation of Peach Bottom Administrative Procedure No. A-7, specifically paragraphs 7.1.7 and 7.1.8. These sections directed me to be alert and particularly attentive to instrumentation and controls, and to prohibit distracting activities, including reading that is not directly job related. As referenced in my Notice of Violation, my failure to adhere to Administrative Procedure A-7 is a violation of my license.

As I admitted during my enforcement conference, I did violate Administrative Procedure A-7 by relaxing back in my chair and closing my eyes. I did this rarely; however, it did give the appearance of inattentiveness and, therefore, was wrong. I also violated A-7 by reading non-job related material while on shift. I have further responsibility, which I also admit, in that I did not stop others from engaging in these behaviors.

I began to behave in this unacceptable manner gradually, as I became more confident in the Control Room. I read non-work related material to keep me alert through the course of the 11:00 p.m. to 7:00 a.m. shift. At the time, I convinced myself that reading was not a safety risk, because I believed I was checking my instrumentation often enough.

The safety implications of my behavior are now obvious. I understand that I must be able to react quickly to problems and to changes in plant conditions. To do the best job, a reactor

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operator must know what is going to happen ahead of time. He must also know that he cannot allow even the smallest slip in procedural compliance, because by letting little things "slide by" he is risking a large scale problem.

I came into compliance immediately with the Shutdown Order. I addressed my problems with shift rotation adjustments that had prompted me to read to stay alert, by trying to get adequate rest on my two days off between shift changes. I also make sure that I work minimal overtime, unless it is unavoidable. I plan ahead now to make sure that my personal schedule fits into my working schedule. During the shift, I stay on my feet and walk around constantly. I pay attention to every detail of my job, and avoid situations in which I could appear complacent.

Through the training provided by Philadelphia Electric Company I learned the importance of communications in forming an effective working team with the other operators. We had used a team concept during start-up, and I approved of returning to it, because it keeps you in touch with your crew. I understand that subordinates will not respect me as a supervisor unless I set a good example. I also understand that any infraction of the rules regardless of my excuses for it (for example, reading kept me alert, I only read educational material) will not be tolerated.

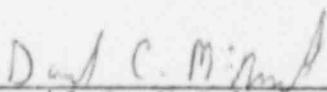
We are all working to ensure that there are no future violations, and that everyone in Operations remains in compliance with his license's requirements. We expect to have two supervisors on shift to enable us to make plant tours and to offer relief to the crew as needed. We supervisors will maintain knowledge about plant conditions this way, and we also will ensure that the operators stay alert. I know that as a supervisor it is my job to detect a problem before it affects my operators, and to get back to them about correcting any problems which they have brought to my attention. I also know that it is my job to keep everybody sharp and on his toes. I have to continually come up with projects that are productive and worthwhile to keep my operators motivated. We are looking to move some testing to the back shift, as well as other activities to meet this challenge.

A particular interest of mine is to have a forum for shift supervisors to meet, in addition to our regular shift meetings. We need an effective way to organize and discuss issues that concern us. I have suggested that we join the monthly shift managers meeting, and I am still working towards this goal. We supervisors have much experience and knowledge that can be passed along to everyone in Operations.

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In conclusion, I can assure you that I am now in complete compliance with all of Peach Bottom's Administrative Procedures and Technical Specifications. I am better prepared physically to successfully complete a shift rotation and I fully understand that one cannot pay too much attention to detail. Forgetting one step can cause a violation and the blame for that will go nowhere else: it will stop with me. The opportunity to redeem myself that you have given me will keep me doing the best job possible.

Respectfully submitted,



David C. McRoberts

Enclosure: \$500.00 Penalty

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

