

DCJ

September 7, 1988

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

Re: James M. Weaver  
Docket No. 55-9529  
License No. OP-10031-2  
EA 88-28

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

I was advised by letter dated August 9, 1988, from James M. Taylor, Deputy Executive Director for Regional Operations that a Notice of Violation and Proposed Civil Penalty was filed against me by the Nuclear Regulatory Commission. This action was imposed upon me due to my failure to properly discharge the duties and responsibilities of my reactor operator license.

I acknowledge that I was involved in inattentive activities and condoned the involvement of others in such activities prior to the plant shutdown on March 31, 1987. My conduct, which included reading non-technical material while on duty, reclining in a resting position with my feet up, demonstrating a golf game and engaging in distracting horseplay, was in violation of Administrative Procedure A-7 as well as the provisions of my license. I also saw others engaging in similar conduct; however, I never took steps to report or stop the behavior.

I have had a long time to think about the reasons for the problems at the plant and the various causes for the breakdown of plant procedures. I have had many sleepless nights, and have done extensive soul-searching over these issues. In the beginning, I was very angry at the General Electric employees who, I felt, had been the cause of the shutdown. I recognize that the blame does not lie with them, however. The blame lies with me. I developed a very

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poor attitude towards my responsibilities on the job. It was a sloppy attitude, and it was wrong.

I think now, in looking back on the situation, that what happened was for the best. We, as operators, were not as sharp as we should have been. There are a lot of reasons for that, including our dissatisfaction with shift work and the feeling that management really was not interested in our problems. At times I thought Peach Bottom was so chronically short of licensed operators, that I would never be able to leave shift work for another position.

I believe my real downfall, however, was the fact that I lost sight of my responsibilities as a license holder. I originally felt this responsibility when I first got my license. It was only after the March 31st shutdown and after SRO training that I was reminded of its seriousness. Being an operator is such an awesome and enormous responsibility; unfortunately, I lost track of that somewhere.

It is not a very comforting thing to realize that you have violated a trust; that you have violated a responsibility. I know that I am a good operator. I know in my mind and in my heart that I can operate Peach Bottom safely and effectively. Now it is important that I prove to the NRC, to the community, to the industry, and to myself that I can excel as an operator. Because of this experience, I know that I'm going to be a better operator. As a licensed operator, I am the first line of defense against an accident which may affect my family, friends and the area in which I was raised. That means more to me than I can express. I want to be able to read, sometime in the future, that Peach Bottom is one of the top ten plants in the country. I want to be there ten years down the road, or twenty, or whatever it takes, when Peach Bottom is regarded in such a way.

I have made a lot of changes in myself in order to correct my behavior, and Philadelphia Electric Company has made improvement to help me. Management has brought John Franz back from Limerick Generating Station. He is a good man; he is a good engineer. He listens to the operators and is responsive to our needs. That is a positive sign.

In addition, changes have been made to our shift rotation so that we rotate with the clock, not against it. This change has made a positive impact on the way I am able to sleep at home and on the way I am able to adjust to the shifts. I try to get additional sleep to prepare for night work, and I have incorporated what I learned about the effect of diet on shift changes. I try to bring something light to eat on night shift instead of something heavy and filling. I also try to get more exercise. All of these things help me to feel better and, in turn, stay more alert.

Management has also assigned us to shift teams. I now work with the same group of men all of the time, which, again, is a positive step. In this way, I can get to know others' strengths and weaknesses. We are better able to help each other because we instinctively know how each of us will respond to any given situation.


One of the ideas that I took from the PPE course PECO provided was the realization that behavior breeds behavior. Other operators were influenced by the way I dressed, the way I acted, and the attitude I had. I was equally as influenced by their behavior. One thing is certain, after this event, I want to be a positive influence on those around me. To do this, I intend to actively participate in training operators on my shift, both the newly licensed operators and the floor operators. If I deal with the first person I train in an honorable way, he'll carry that feeling away and deal positively with the next person.

Over the last year and a half, I have been harder on myself than I think the NRC or anyone else can be. I am determined that I will improve by acting like the professional I am, and by approaching the duties of my job with certainty, honesty and conviction. There are a limited number of people in this country who can do what I can. At this point, I feel that there are few who can do it better. I had a special responsibility to others in the Control Room as a leader. I recognize now that I misused that trust. At the time, I failed to act appropriately in order to protect the public health and safety. I am cognizant of the fact

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that I must strictly follow procedures for the safety of the  
plant and the safety of the public.

Respectfully submitted,



James M. Weaver

Enclosure: \$500 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.:

Before me, a Notary Public, personally appeared JAMES M. WEAVER, 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. Perry Anderson*  
Notary Public

(SEAL)

My commission expires:

J. PERRY ANDERSON, NOTARY PUBLIC  
LOUIS CHAMBERS TOWNSHIP, YORK COUNTY  
MY COMMISSION EXPIRES APRIL 26, 1991  
Member, Pennsylvania Association of Notaries