

DCS

September 7, 1988

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

Re: Paul B. Cromwell
Docket No. 55-3681
License No. OP-6208-2
EA 88-08

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

As you well know, during my Enforcement Conference on February 16, 1988, I readily admitted to committing violations of my reactor operator license. Accordingly, the Nuclear Regulatory Commission has seen fit to propose a civil penalty, as well as a Notice of Violation, Severity Level III. Let it be known that I readily admit to the violations in that I was, at times, inattentive to instrumentation and controls, and I allowed myself to be distracted by activities that I knew violated Administrative Procedure A-7. These activities included reading non-job related materials while on duty, reclining in a resting position with my eyes closed, and engaging in horseplay.

As I explained at my Enforcement Conference, I cannot really put my finger on the exact reason for these violations of procedure, and I realize that there is no excuse for them at all. The hours of boredom in the Control Room contributed to the reclining and reading of non-job related materials. I also believe that the lack of any real disciplinary policy contributed to my unprofessional behavior; I knew that my immediate supervision was not backed my management and I knew that my supervisors could not discipline me. I also believe that my low morale prior to shutdown contributed to my unprofessional conduct. I almost never received praise or positive comments on my job performance; instead I only received criticism and negative feedback from management. I realize now that I hold my license not only for Philadelphia Electric Company but also for the Nuclear Regulatory Commission and the public, and I intend to do a professional job whether I am praised for it or not. Looking back I now realize that I was doing just enough to get by at work, and that is not enough for the holder of a Nuclear Regulatory Commission license.

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I do believe that there has been a major turnaround at the Plant, and that for various reasons all of the operators have joined together to make this a better run organization. I know that I now personally follow the procedures and technical specifications to the letter, something that I did not always do in the past. I have picked up several skills from the PFE course, and I do not intend to let it stop with the classes; I intend to continue to do on my own, what I was instructed to do in the PFE training program.

One of the main lessons I received from the PFE training was how to better communicate with people. This improvement in communications is not only between the operators themselves, but also between the Operations Department and management. The Operations Department is now more incorporated in the decision making process, and this has led to an increase in self-esteem within the Operations Department.

Another marked improvement at the Peach Bottom facility is the improvement in team work. We no longer rotate shift-mates as we did before; we are now working with the same people all of the time, and by working with the same people we know better what to expect from each other. We now also have a better feel for how our fellow operators will respond to different situations.

I also believe that the new shift rotation has greatly improved our ability to remain alert and cognizant of our instrumentation. It appears that by having the shifts rotate forward instead of backward, it is much easier to make the adjustment from one shift to the next.

The recruiting of more licensed personnel has definitely had an impact on our ability to remain alert and attentive. I am now working less overtime hours than I ever did and the other operators are similarly voluntarily giving up overtime. By having less overtime, there are also fewer problems covering for other operators who are on vacation or need to take sick time. Overall I recognize a very apparent increase in the energy level of not only myself, but the other operators as well.

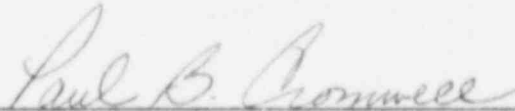
Following procedures is another area where I have changed my way of doing things. I know that I am now following every procedure to the letter, and if I do not have a procedure I will stop and make sure that we write one up before we proceed. Similarly, if I run into a procedure that needs to be changed, I take the time to change it now, whereas before I may have just muddled my way through it and let someone else worry about making the change. Prior to shutdown I put more emphasis on following tech specs and surveillance tests than on administrative procedures. However, after thinking about it for the past year and a half or

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so, it has sunk in that all procedures are equally important and they all have a reason for being.

In answer to your question posed in the Notice of Violation, I believe that full compliance with the NRC regulations has been achieved; I know for a fact that it has been with me and see no indications that there are others operating that do not feel the same way I do. I am very proud to hold an NRC license. It reflects an awful lot of hard work that I have put in over the years. I am particularly proud to have a senior license; this means as much to me as obtaining my wings in the Army. I will continue to act professionally and expect to be treated and looked upon as a professional in return. I believe that it will be much easier now that we have had a year to do it right, and we are all working together to hold each other to the highest professional standards. I have absolutely no doubt that the NRC will not regret granting me the opportunity to continue as a licensed reactor operator.

Respectfully submitted,



PAUL B. CROMWELL

Enclosure: \$500.00 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 Paul B. 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. Kerr Anderson
Notary Public

(SEAL)

My commission expires _____, 19__.

J. KERR ANDERSON, NOTARY PUBLIC
LOWER CHANCEFORD TOWNSHIP, YORK CO., PA.
MY COMMISSION EXPIRES APRIL 26, 1989.
Member, Pennsylvania Association of Notaries