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September 6, 1988

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

Re: Richard A. Maldonado  
Docket No. 55-60783  
License No. OP-10419  
EA 88-19

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

I have been charged with a Severity Level III Violation and a proposed civil penalty of \$500.00. I have been subjected to this penalty because I violated Peach Bottom Atomic Power Station Administrative Procedure A-7, which means that I violated my Reactor Operator's License.

I admit that I violated paragraph 7.1.7 of Administrative Procedure A-7, which required that I remain alert and attentive to the instruments and controls within my assigned area at all times. I also admit my violation of paragraph 7.1.8 of Administrative Procedure A-7, which required the removal of all distracting activities from the Control Room. Specifically, I put my feet up and closed my eyes, particularly during night shifts. I read magazines, I played computer games and I played a golf game. I knew these activities were prohibited by Administrative Procedure A-7, but I engaged in them anyway.

I broke the rules for a variety of reasons. I wanted to "fit in" with the other operators. I became bored if I ran out of assignments on night shift; on those occasions, I played a video game or read a magazine. Although my superiors did set rules, they enforced them erratically and infrequently. I took advantage of this. I thought that it was enough to be able to respond to an alarm or to someone calling me. It was not; I should have been spending all of my time monitoring essential plant parameters.

I felt guilty right away when I learned of the Shutdown Order. I knew my conduct was a contributing factor. After I was re-trained by Philadelphia Electric Company, I started to realize the enormous responsibility that went along with receiving a license. I am the one who must exercise that responsibility.

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That means I must know everything there is to know about my job, question every task, diligently log all of my activities and act as though the public is looking over my shoulder every second, while I stand watch in the Control Room.

To push myself to learn more about my job, I volunteered, with a co-worker, to aid those engineers and construction workers in charge of re-designing the Control Room. We began to express our opinions of their modification ideas so effectively that soon not only the construction workers were seeking us out, but the actual design engineers were, too. The result is that changes I insisted upon have been placed into the Control Room design. Because of my input, the engineers are really providing Operations with improvements that will help us do our jobs better. I have already started my next modification project: contributing to the programming of the new process computer. Once again, the engineers in charge are realizing how helpful it is to consult with operators to obtain the most efficient, yet most useful design.

The information gained from my meetings and the research that I put into these projects have made me a more knowledgeable operator and shaped my corrective actions. Through the course of this I realized that I got into trouble on shift when my mind was not challenged. I should have used quiet time as I do now to focus on corrections that I believe are needed and to discuss my ideas with the other operators. They are an excellent resource because they give me suggestions that have not even dawned on me. I intend to keep volunteering for special projects so that I can stay personally challenged. I enjoy being consulted by engineers whom, I suspect, have been surprised by my knowledge of plant systems. While earning their respect has been a good experience, it has also been rewarding to feel a part of the solution to Peach Bottom's problems. My attitude has greatly improved by realizing that I am a part owner, no matter how small, of this Station.

It has taken me 31 years to find something I truly enjoy and believe in. I know I came very close to losing the right to practice my career. I am sorry that it took a Shutdown Order to turn me around; on the other hand, you must understand that I will do a far better job in the future, because of what I have been through. I will demand a fully attentive, trustworthy

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performance from myself, and insist on the support of the other operators.

Respectfully submitted,

  
RICHARD A. MALDONADO

Enclosure: \$500.00 Penalty

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

