

DCS

September 6, 1988

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

Re: Edward G. Alwood
Docket No. 55-4756
License No. SOP-10085
EA 88-76

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On August 9, 1988, I was served with a Notice of Violation, Severity Level II and a proposed civil penalty of \$1,000., resulting from the enforcement conference conducted with me on March 29, 1988. I was charged with violating Peach Bottom Atomic Power Station Administrative Procedure A-7 and my former senior reactor operator license by being inattentive to duty and by permitting those under my supervision to be inattentive to duty on various shifts for an extended and indeterminate period of time prior to March 24, 1987, particularly during the 11:00 p.m. to 7:00 a.m. shift.

I admit that I did not properly execute my duties as a Shift Superintendent and Senior Reactor Operator. While I did not read non-technical material once I became a Shift Superintendent, I had done so prior to assuming that position and I did permit operators on my shift to read. Also, I did not initiate proper disciplinary action when I found people reclining in a resting position with their eyes closed. I know that I should have required the operators under my supervision to be more alert while on duty. When I observed this lack of compliance with Administrative Procedure A-7 I should have reported it to my management and insisted that disciplinary action be taken; there is no excuse for my failure to do so. I let my standards fall and I contributed to the lax attitude that prevailed among the operators and supervision at Peach Bottom.

The irony of the situation is that I was made a Shift Superintendent to upgrade that position; instead of doing that, I abetted its downfall. I assumed, based on a few bad experiences, that my disciplinary recommendations would be ignored, so I allowed the unacceptable conduct to continue. In retrospect, I blame my failure on my inability to recognize the role human behavior in the Control Room played in overall plant safety. I knew a lot of technical information about the design and operation of Peach Bottom, but I did not know how potentially dangerous human failings are to the safety of the plant.

8809140313 880906
PDR ADOCK 05000277
Q PDC

IEIY
11

Director, Office of Enforcement
September 6, 1988
Page 2

While I have lost my license, suffered financial loss and untold embarrassment, I am grateful for the fact that I have permitted to remain an employee of Philadelphia Electric Company and continue working at Peach Bottom. I have argued with the implementation of the Human Performance Evaluation System program, this program will help ensure safe operation of Peach Bottom.

Although I am no longer in operations, I still talk to the operators about why I failed them, and how we should have conducted ourselves in the Control Room. We discuss the necessity for total compliance with procedures, how to seek and maintain management support, and what we must do to ensure Peach Bottom is operated safely. I am proud of the fact that the operators still feel they can come to me with questions they have, and look to me for recommendations and solutions to problems.

I want you to know that the operators are far more positive about their role at Peach Bottom than they were before. They are demanding better management support, better procedures, better working conditions, and they are earning mounting respect. All of us who have been through this know that Peach Bottom will now be operated strictly by the rules.

Respectfully submitted,



Edward G. Alwood

Enclosure: \$1,000.00 penalty

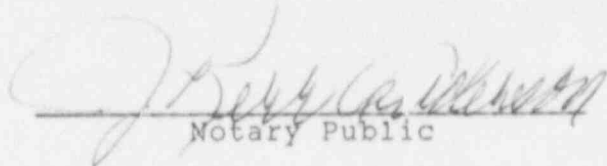
cc/wc: Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
: SS:
COUNTY OF YORK :

Before me, a Notary Public, personally appeared Edward G. Alwood, 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 7th day of September, 1988.


Notary Public

(SEAL)

My commission expires _____, 19__.

J. KEITH ANDERSON, NOTARY PUBLIC
LOWER MERIONISTOWN, PHILADELPHIA COUNTY
MY COMMISSION EXPIRES APRIL 26, 1991
Member, Pennsylvania Association of Notaries