

DCS

September 7, 1988

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

Re: Richard A. Blasy
Docket No. 55-3223
License No. SOP-3498
EA 88-75

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

By letter dated August 9, 1988 you notified me that I would be charged with a Severity Level II Violation and a \$1,000.00 civil penalty. I received this penalty as a result of my enforcement conference conducted on March 25, 1988. Specifically, I was charged with being inattentive, at times, to instrumentation and controls and allowing myself and those under my supervision to violate the requirements of Peach Bottom Atomic Power Station Administrative Procedure A-7.

This is my notification to you of my admission that I violated my license and that I did not comply with the responsibilities given to me by the Nuclear Regulatory Commission. For a long period of time, I permitted Operations personnel to read non-technical material on shift. I also did this myself. Additionally, I permitted those under my supervision to assume a laid-back position and I refrained from disciplining them.

I believe that procedures were violated as part of a process that was accepted and condoned for years. Many of us, the operators and myself included, came out of fossil stations and brought bad habits with us into the Control Room. Our behavior on shift was determined by what we felt we could get away with, or what we let our operators get away with. Unfortunately, we also permitted a severe morale problem at Peach Bottom to affect our behavior. When I was a Unit 1 reactor operator, my behavior and the behavior of other licensed personnel was better than it was immediately before the Shutdown Order of March 31, 1987. Although our compliance with Administrative Procedure A-7 deteriorated over time, we still thought we were doing a good job and that we were running a safe Plant. We did not believe that we were doing anything intentionally detrimental to the safety of

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the public or the Plant. We were wrong: our conduct was unacceptable.

I personally believe that the Shutdown Order was the best thing that ever happened to Peach Bottom Atomic Power Station. Once we got over the shock, we used the shutdown period to address the multitude of problems at the Plant. We are finally beginning to solve management problems at the corporate and Station level, and shift supervision now has more disciplinary authority over Operations' personnel. We are resolving our poor or inadequate procedures, and working on the attitudes of Station personnel to correct the low morale problem that existed in the Operations Department. I have the firm conviction that we will never intentionally violate procedures again. Not only would management not allow it with the changes that are going on at the Plant concerning the way we do business, but I would never personally allow it to happen again. I know that I will never again go day after day and accept things as "business as usual". If I encounter a problem, I will keep going after it until I can resolve it satisfactorily.

In my opinion, we were hampered with poor operating procedures for a long, long time. I have been given the opportunity to be part of the process of re-writing the existing "S" procedures. My group has accepted this challenge and we are taking pains to make our procedures the best in the industry. To date we have reviewed over 1,000 procedures for accuracy and clarity. We have a chain for operators to use to address problems and a system for the generation of procedures. We obtain a lot of operator input and we all understand that this is our only chance to do it right. I know that we will because none of us has the attitude that he had before. We have backing, we have authority and we have everyone's cooperation. I know that no matter what happens I will never operate as I operated before. I hope I have made that clear to you.

Respectfully submitted,


Richard A. Blazy

Enclosure: \$1,000.00 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 Richard A. Blasy, 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,
Sept, 1988.

J. Anne Anderson
Notary Public

(SEAL)

My commission expires , 19__.

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