

September 19, 1988

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

Re: Charles E. Koehler
Docket No. 55-7557
License No. SOP-10507
EA 88-105

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On May 17, 1988, I attended an Enforcement Conference as a result of the NRC's decision to suspend operations of the Peach Bottom reactors due to allegations of operator misconduct. On August 9, 1988, I was served with notice that I would be charged with a violation of my License, classified at Severity Level II, and subjected to a proposed penalty of \$800.00. I was directed to submit an admission of the violation charged, and the reasons for the violation.

During my six years in the Control Room at Peach Bottom Atomic Power Station I violated Administrative Procedure A-7 and my Senior Reactor Operator's License. I read non-technical material, I assumed a less than professional posture which, at times, could have given the appearance of sleeping. I also played a video game on the Control Room monitor computer console in 1985. As a Senior Operator, I was responsible for the actions of my operators and for the safe operation of the Power Plant. I did not carry out that obligation because I observed inattentive behavior and I allowed it to continue; moreover, I did it myself.

I engaged in this behavior for several reasons, all equally unacceptable. I found my job to be boring at times, so I would read to keep myself busy. I permitted my behavior to be affected, detrimentally, by the low morale problem that existed at Peach Bottom. In my opinion, Management did not pay attention to the operators as though we were a pivotal part of the Control Room; as a result, I allowed my behavior to deteriorate.

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Director, Office of Enforcement
September 19, 1988
Page 2

While I was employed in a licensed capacity at Peach Bottom, I received some confusing signals as to what conduct was acceptable in the Control Room. For example, I was given permission to read non-job related textbooks while on shift; I even had a discussion with an upper management official about calculus, after he had seen me reading a calculus book in the Control Room. I also was observed by the same official in what he considered to be an inattentive posture on my part; however, he did not speak to me about it, and I only learned of his opinion after my immediate superior mentioned it to me.

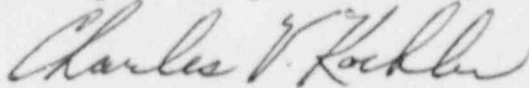
Although management was in error in refusing to demand strict, uniform standards from me, I was in error because I never personally made an attempt to clarify the confusion. When an instruction came out from management prohibiting non-job related reading, I would comply until I sensed a gradual breakdown. I then would resume reading, again. I had no fear of reprisal from Philadelphia Electric Company, because I knew PECO needed my license to operate the facility. We were too short-handed in the Control Room for me to believe, seriously, that I risked my job or my license by engaging in inattentive behavior. I never really thought of the personal responsibility I held as a licensed operator. It was my impression that because PECO needed my license to operate the facility, the license I held was, somehow, not mine individually. I mistakenly saw it as a part of PECO's license and I believed PECO would "take care of me" if any NRC action ever came about as a result of my performance in the Control Room.

I resigned from Philadelphia Electric Company in June of 1987, as part of a career change not connected to the Shutdown Order. I am still associated with the nuclear power industry, so I value the fact that I will not be subject to future restrictions as a result of my actions while at Peach Bottom. I fully realize that what I did was wrong and that I jeopardized the health and safety of the general public. Over the course of the past year, I have grasped the seriousness of proper Control Room behavior and I have adopted a more professional, no nonsense approach to the demands of nuclear power. I know that my job hinges on what I do and that I am solely responsible for my actions as well as the actions of those around me. I can assure you that my continued access to control rooms will serve a

Director, Office of Enforcement
September 19, 1988
Page 3

useful purpose. I sincerely promise to be a valuable part
of this industry, in the future.

Respectfully submitted,



Charles V. Koehler

Enclosure: \$800.00 Penalty

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

AFFIDAVIT

STATE OF ALABAMA

:

: SS.: 342-42-8572

COUNTY OF *Madison*

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Before me, a Notary Public, personally appeared CHARLES E. KOEHLER, 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 23 day of *September*, 1988.

Jeanette Wright
Notary Public

(SEAL)

My commission expires:

12-4-91
My Commission Expires 12-4-91