

September 19, 1988

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

Re: Daniel W. Duane
Docket No. 55-7556
License No. SOP-10607
EA 88-10

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

This is my "Reply to Notice of Violation and Proposed Imposition of Civil Penalty" as requested on August 9, 1988. I hereby acknowledge my License Violation, Severity Level III, and I have enclosed payment of my civil penalty of \$500.00.

As I stated at my Enforcement Conference on February 8, 1988, I was at times guilty of reading non-technical materials and being less than attentive to my instrumentation. The reading of non-technical material was a way of life at Peach Bottom; it had always gone on and had always been "permitted" in the sense that nothing happened when I read on backshift. I came into the Control Room, saw what others were doing and when my work was finished I read, too.

One of the reasons that all of us became engaged in inattentive conduct was that we worked too many hours of overtime. We became bored, just sat in our chairs and, consequently, had a hard time remaining attentive. Another reason for the violation of Administrative Procedure A-7 prior to shutdown was a morale problem within the operator network. Some operators wanted to be transferred to Limerick Generating Station and were not allowed to do so. Their attitude was that they were unfairly forced to stay at Peach Bottom because Peach Bottom needed manpower. In addition, we operators thought we knew best how to run the Plant; we had a great productivity record and had set records for production. This attitude led us to believe that we could shortcut Administrative Procedure A-7, and still operate safely.

We now realize that we are entrusted with much more than just sitting in a chair with a blank stare on our faces. I personally do not spend as much work time in my chair as I did

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before shutdown. While I am making my rounds, I ask questions of other operators regarding jobs they are completing, and I actively supervise the other operators on my shift. I also have cut back from an average of approximately 64 work hours a week to about 48 hours a week since the shutdown. I try to get at least one day off between each set of shifts. I feel much better by doing so and I know that the hours I spend in the Control Room now are quality filled hours, during which I am in complete command of my physical faculties and the Control Room.

Philadelphia Electric Company has helped me to become a better operator by introducing me to the PFE training program. PECO had never taught me how to deal with, or manage people before, and I learned a great deal through the management classes offered, including how to discipline people in a way that did not make the experience all negative. Another improvement at Peach Bottom has been the simulator training. The requalification program reinforces what we learned at the PFE program and PFE people now actually come to the simulator with the operators to see that we can communicate with one another.

The circadian rhythm instruction I received helped me in maintaining my stamina while working, especially on the back shifts. I finally understood why I felt like I did at certain times of the day, and how if I ate certain food at different times of the day I would adjust better to shift changes. The fact that our wives were also instructed in circadian rhythm principles has also helped with my family life. My family knows how important it is for me to sleep during the days that I am on the back shift, because it is my responsibility to be at my best when I report to work.

One of the major improvements at Peach Bottom is the number of newly licensed operators who will help to further reduce the number of hours that we must work. On August 23, 1988, we received the welcome news that we have six newly licensed operators. This will further help to lessen the number of hours we have to work to cover all the shifts, when people are trying to schedule vacations and taking sick time. We also now have twelve shift supervisors where we used to have only six. All of this is paying off both in the morale of the operators (no one likes to be forced to work overtime) and in the physical condition of the operators when they report for work. We now have the luxury of taking breaks between the actual operations of the Plant and we take advantage of the opportunity to accept relief, and leave the Control Room to remain fresh.

The Shutdown Order last March was a cold slap in the face for many of us at the Plant. We all realize that we do not have any second chances, so we are all committed to working together to ensure that the Plant is running according to the rules

Director, Office of Enforcement
September 19, 1988
Page 3

imposed by our licenses. While I believe that the Peach Bottom plant is currently in full compliance, I also recognize that my corrective actions must be ongoing and continuous.

In summary, I am looking forward to having the shutdown period put behind me. I readily admit to violating Administrative Procedure A-7, and I am not at all proud of my past behavior; nevertheless, I look forward to once again being proud to tell my neighbors and friends that I am an operator at the Peach Bottom Nuclear Power Plant. I am convinced that having been put through something as traumatic as a shutdown can only work to my benefit and make me a better operator. It will also help me instruct the young operators at Peach Bottom not to make the same mistakes that I made.

Respectfully submitted,

Daniel W. Duane
DANIEL W. DUANE

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 *Dauphin* : SS:
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Before me, a Notary Public, personally appeared Daniel W. Duane, 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 *21st* day of *September*, 1988.

Bernice Jennings
Notary Public

(SEAL)

My commission expires , 19__.

Bernice Jennings, Notary Public
Harrisburg, Dauphin County
My Commission Expires April 30, 1992