

September 19, 1988

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

Re: Richard F. Truax  
Docket No. 55-9528  
License No. OP-10030-2  
EA 88-26

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On August 9, 1988, I was informed that I would be charged with a Notice of Violation, Severity Level III, and a Proposed Imposition of Civil Penalty amounting to \$500.00. The Violation and penalty were to be assessed for conduct that required me to attend an enforcement conference on February 17, 1988. The charge against me states that on various shifts for periods of time prior to March 24, 1987, I was, at times, inattentive to instrumentations and controls, and distracted by activities that violated Peach Bottom Administrative Procedure A-7.

I wish to admit to the above-stated violation of my Reactor Operator's license. At times I did sit in a relaxed position with my feet up, and with my eyes closed. I read non-technical material, I played video games and I engaged in horseplay in the Control Room. I did not stop others from doing these same things.

Although I knew I was violating Administrative Procedure A-7, I did these things to stay alert. Although I had been warned on a previous occasion that I was slow in responding to an alarm, I did not fully realize what could happen if I were inattentive until March 17, 1987. If I had been walking the panels on that evening, instead of sitting at my desk, I might have caught the spikes that showed up on the recorders. The result was a scram which I could have prevented.

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You need to know whether I am in compliance with Administrative Procedure A-7, and I can assure you that I am. I believe that the Peach Bottom Control Room currently is in a safe condition and I want the public to believe that. I understand that I must not give the appearance of sloppy, inattentive behavior. I define inattentive behavior as doing anything that might make someone think I was not paying attention to my job.

To prevent anyone from forming that impression, I do not sit down on shift unless I am doing necessary paperwork. Walking around the Control Room has made me more conscious of equipment status. Before, I might not have realized until there was an emergency that certain equipment was not available for my use. Now, I try to know the status of equipment so that on a given night, if something should occur, I would know automatically where my equipment stood. I also make sure that everything is done correctly in the Control Room, and throughout the Plant.

I understand it is my job to watch each unit Reactor Operator to make sure he is as alert as I am and doing his work, properly. On night shift, particularly, I relieve the operators or go over and talk to them about their work for the shift. In the past, no one took charge to make sure that the Reactor Operators were observing their panels; now, we all assume this responsibility.

Philadelphia Electric Company helped me learn how to communicate better by requiring my attendance at a PFE course. The course taught me how to communicate with the people I work with; for example, I was taught how to ask a floor operator to repeat the order I had just given him, so that we could both understand the details of the job I had assigned. I was told that because I am an introvert, I must make a special effort to push myself so that other operators can learn from my example. I know that it is my job to help set the standards for the shift and to express those standards to all who come into contact with me.

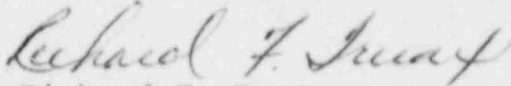
I never realized until after the Shutdown Order of March 31, 1987, that I had risked both my job and my license by violating Administrative Procedure A-7. To prevent a re-occurrence of the behavior that caused the shutdown, I try to act like a professional and look like a professional. Where before I would wear a T-shirt and jeans, I now wear a shirt and tie. I take pride in my work, I am more assertive and I involve myself in the activities that are going on in the Control Room. I also try to ask myself how the public

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would view my actions - something to which I had never given much thought, in the past. Keeping the public view in mind gives me a heightened sense of responsibility.

I understand fully that the things I did could have justified the Nuclear Regulatory Commission in taking my license. I will never forget how close I came to that. I know that you depend upon me to guarantee that the Plant is operating within the bounds established by technical specifications and procedures. I promise to act at all times in a manner that will give the public confidence that I am complying with this obligation.

Respectfully submitted,

  
Richard F. Truax

Enclosure: \$500.00 Penalty

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

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF *Dauphin* : SS.:  
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Before me, a Notary Public, personally appeared RICHARD F. TRUAX, 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 *1st* day of *September*, 1988.

*Bernice Jennings*  
Notary Public

(SEAL)

My commission expires:

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