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September 26, 1988

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

Re: Adam R. Clark
Docket No. 55-4754
License No. SOP-10226-1
EA 88-06

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

Under date of August 9, 1988, I received a Notice of Violation from James M. Taylor, Deputy Executive Director for Regional Operations. This Notice charges that, as a Shift Supervisor at the Peach Bottom Atomic Power Station, I was, at times, inattentive to instrumentation and controls and allowed myself and those who I was required to supervise to violate the requirements of Administrative Procedure A-7. I have been advised that I have been assessed a civil penalty of \$800.00 for these infractions.

This letter will constitute my response to those charges which I admitted at my enforcement conference, and I enclose my check in the amount of the penalty.

As a Shift Supervisor, I was responsible not only for my own conduct, but for the conduct of each of the men on my shift. Although it was not my primary responsibility to constantly monitor the instruments in the control room, it was my job to make sure the operators did so. At times, I allowed others to be inattentive. The responsibility to properly supervise my crew falls directly on my shoulders, and I acknowledge my failure to supervise properly. Specifically, between July, 1976 and April 1986, I brought non-technical reading material into the control room and read it. In April of 1986, approximately, we were told to remove all material of a non-technical nature from the control room. It was emphasized that the reading of this material was to end. I complied, and there was a noticeable

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decline in the reading habits of all personnel; however, reading still continued on my shift, and I did not stop it.

On one occasion early in 1987, I observed two operators displaying a video game on the control room computer terminal. During this time, they allowed two charts to run out without replacement. Although I pointed out the consequences of this inattentiveness, I failed to take any further steps to make certain there would be no reoccurrence.

As I look back to determine the reasons for my behavior, I have to conclude that the single most important reason was my belief that I was responsible only for my own actions. I honestly believed this, and felt that everyone else should be responsible for his own actions. I also believed that it was not possible to motivate people to stay alert on night shift. Permitting my people to read seemed like an acceptable alternative to the drowsiness that comes naturally with night work and extensive overtime. I see now how wrong I was. There is no acceptable alternative to doing the job right, and this means following all procedures to the letter.

As for everyone being only responsible for his own behavior and no one else's, this concept cannot work at a nuclear power station. Everybody is responsible for reporting non-compliance. If one person makes a mistake, it reflects not only on the entire shift, but quite possibly everyone living within a hundred miles of the plant. And people can be motivated, if by no other method than constantly reminding them that violation of procedures means immediate termination. It wasn't always this way at Peach Bottom. Prior to the March, 1987 Shutdown Order, most recommendation for discipline fell on deaf ears, unless it was for an infraction that was very serious. Reading or sitting back in a relaxed position and closing your eyes for short periods of time was not considered a serious enough violation to warrant extreme disciplinary action. Today this is not true. We have been informed by top management that anyone who even appears to be asleep will be suspended immediately, with recommendation for termination. This was effective. No one even looks drowsy in the control room anymore.

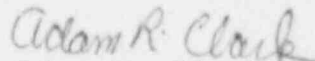
I do not mean to imply that we have changed our way of operating the plant solely because of fear of termination. If fear were the only motivator, in time I feel certain we would be back where we were prior to shutdown. We have all had an extensive, intensive program which deals with

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communication with others, and handling the conflicts which will always occur when different personalities are working together. Previously, all of our training involved machinery, yet 40 percent of our job was dealing with people. From this new training we have forged a team, when previously we were only several individuals assigned to a shift. As a team, we are all pulling in the same direction. We take pride in this, and in each man knowing he does not want to let his crew down.

It is my firm belief that we have achieved full compliance with the procedures and technical specifications at the Peach Bottom plant, and that we will continue to be in compliance in the future. As a Shift Supervisor, I am personally committed to making certain that there are no further violations on my shift. We have regularly scheduled shift meetings, and constantly stress our commitment to safety first and schedule second. I know we have the support of management and of each other in this endeavor.

Respectfully submitted,


Adam R. Clark

Enclosure: \$800.00 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 *Y. RR* : SS.:
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Before me, a Notary Public, personally appeared
ADAM R. CLARK, 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 *2nd* day of
Sept, 1988.

J. Kerr Anderson
Notary Public

(SEAL)

My commission expires:

J. KERR ANDERSON, NOTARY PUBLIC
LOWER CRANFORD TOWNSHIP, YORK COUNTY
MY COMMISSION EXPIRES APRIL 26, 1991
Member, Pennsylvania Association of Notaries