

205

September 26, 1988

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

Re: Russell W. Kirkhoff
Docket No. 55-60880
License No. OP-10494
EA 88-17

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

I have received a Notice of Violation from James M. Taylor, Deputy Executive Director for Regional Operations. The Notice charges me with certain behavior prior to March 24, 1987 which was in violation of the requirements of my Reactor Operator License. Pursuant to the provisions of 10 C.F.R. 2.201, this letter will constitute my reply.

Prior to March 24, 1987, I was a control room operator at the Peach Bottom Plant, having received my license on February 4, 1987. Although newly licensed, I on occasion violated Administrative Procedure A-7 by being inattentive to my instrumentations and controls. At times, during the 11 to 7 shift, I read non-technical reading materials while at the console. I placed my feet on the console and leaned back in my chair, closing my eyes for short periods of time. On one occasion, another operator brought a hand-held golf game into the Control Room and I played this game for about one half hour. Later, I was told by a supervisor that this behavior was inappropriate.

During my Enforcement Conference on February 10 of this year, I tried to explain the reasons for these violations of Procedure A-7. Since I had only been licensed for about a month prior to shutdown, it is very difficult to understand why my conduct deteriorated so quickly. I believe one of the reasons is that I carried this behavior that I had learned after 16 years of employment with Philadelphia Electric Company over into the Control Room. My status changed when I received my license, but not some of my

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habits. Although I had gone through extensive training to obtain my license, and knew from this training that all procedures had to be followed strictly, I lost sight of this and almost immediately became one of the boys. As the new man on shift, I watched others and became a follower. I knew it was wrong, but did not know how to stop it. As I told Mr. Kane at the Enforcement Conference, I am ashamed of my behavior.

As soon as the Shutdown Order came down, I knew the NRC was right and we were wrong. I decided then that I was going to straighten up my act, and that if I were allowed to keep my license, I would be the kind of operator I know I can be. I have re-read my license and carefully reviewed Procedure A-7, and intend to continue to do so periodically. This exercise helps me to remain constantly aware of my responsibilities in the Control Room. Since my prior conduct occurred almost exclusively on the 11 to 7 shift, I am particularly sensitive to my behavior during this shift. I spend as much time as I can on my feet, moving around and monitoring my instruments. Prior to the shutdown, I monitored the controls frequently, but as a result of what has happened I now do so with a different attitude. Previously, I believe a prime motivator for walking the panel was that it relieved boredom. Now, I do this with the knowledge that thousands of people depend on me for the safe operation of the plant.

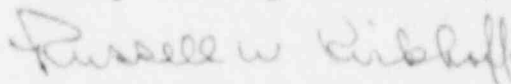
Some months ago I was given the opportunity to participate in the Company's PFE Program. This was an enlightening experience, and very constructive for me. It is easy to simply say that we were shut down because of inattentiveness. PFE taught me to look at the situation from a different perspective. It is one thing to know that I did wrong and had a poor attitude toward my job responsibilities. But it was important that I recognize the reasons behind this attitude and the way I conducted myself on shift. PFE taught me to get in touch with myself and find the root causes for the way I did things in the Control Room. After all, I was a brand new licensee, and certainly my conduct should have been exemplary during my first month on the job. Yet I immediately began to follow the behavior of others. PFE hammered home the one word that I overlooked - safety. The safety of the Peach Bottom Power Plant is now the one thing uppermost in my mind every minute that I am on the job. To constantly be aware of this is my prime objective for the future.

Director, Office of Enforcement
September 26, 1988
Page 3

I feel that I am now in full compliance with the terms of my license. I know, however, that merely fulfilling these requirements is not enough. I can get better and intend to strive to do so. For the first time in 17 years I am working on a team, and the team is pulling together. We all recognize that by not rescinding our licenses, the NRC has given us a second chance. We also know that neither the company nor the NRC is going to give us any more chances. I do not intend to let my company or the NRC down again, and I know that I speak for my entire shift.

Thank you for giving me the opportunity to prove myself.

Respectfully submitted,



Russell W. Kirkhoff

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

