

DCJ

September 26, 1988

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

Re: Donald G. Falcone  
Docket No. 55-9525  
License No. OP-10032-2  
EA 88-12

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 readily admitted at my Enforcement Conference on February 18, 1988, I have at times been guilty of committing violations of my reactor operator license. More specifically, I have at times been less than fully attentive to my instrumentation; I have read non-technical material while on shift, and I have also, on occasions, played a hand-held golf game while on shift. In short, I have participated in and allowed myself to be distracted by activities that I knew violated Administrative Procedure A-7.

I allowed myself to slip into this way of operating after I had spent a certain period of time in the control room. I felt that I had reached a level of competence where I was comfortable with operations. Once I had reached this level of competence, I allowed myself to slip into the habit of sitting back and reading non-technical material. I saw others in the control room doing this even before I became a licensed operator, and because no one was saying anything to them about this practice, I picked up the same practice myself and continued when no one said anything to me about it. I knew then as I know now that it was wrong and an unacceptable practice. I reasoned that reading non-technical material was not affecting my attention to instrumentation because it broke up the boredom on the back shifts and helped to keep me alert. I realize now that this was simply a

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rationalization designed to excuse what I knew to be an unacceptable practice. I used the hand-held golf game for similar purposes and believed that it was helping to keep me alert. Again, I knew then as I know now that this was wrong and unacceptable. I understand now that I cannot be satisfied with reaching a certain plateau of competence; instead I must constantly strive to better understand the plant and to work at becoming the best operator that I can possibly be.

Since the Shutdown Order there have been a number of significant changes made at the Peach Bottom Power Plant. All of the operators have joined together to assist one another in becoming more professional and more proficient in their jobs. I personally have made a significant number of changes in the way that I approach my job. Since the shutdown I have turned down a considerable amount of overtime which I would have accepted before. Now I take into consideration what my body is telling me; not just what my wallet is saying, and I have worked fewer hours of overtime.

I have also realized the importance of arriving at work in peak physical condition. I have taken steps to improve my sleeping and eating habits. I have covered the windows in my bedroom with aluminum foil so that I do not know whether it is night or day. I have purchased a sound machine that produces a white noise which masks out loud noises. My family takes extra effort to make sure that I get my sleep. They plan their activities around my schedule. I have found these steps to be extremely effective in helping me to get the maximum amount of rest I need. I also am much more conscious of watching the amount of time and the periods of time that I sit while in the control room. I now make it a habit not to sit for any extended period of time. I get up and get involved, whether in walking down the panels for the fifth or sixth time during the shift, or checking various plant parameters or engaging in conversation with other operators as to the different jobs they are performing. As a Chief Operator I also make it a point to find out what hours the other people on my shift have worked recently in order to anticipate their level of fatigue. I can monitor their alertness and when necessary, give them a break. This way they can get out and get some fresh air or walk around somewhere outside of their control room duties, and it helps revive them to a heightened awareness of their instrumentation.

Since the Shutdown Order I have become more aware of our responsibilities as role models to other groups of workers at the plant. I attempt to hold myself out as an example to other operators, and hope that they would attempt to model their

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behavior as well as their job performance on the work habits they observe me practicing.

One of the ways in which I now try to better operate the plant is by getting an advance copy of the shift manager's "look ahead" list, which indicates outage priorities. This list gives me a good overview of where the plant is going, and enables me to use the manpower on my shift more efficiently. With this list I can plan ahead and know which jobs or activities will need support during the shift. My shift takes pride in tackling problems instead of just tagging them, and we have received many compliments concerning our ability to get a considerable amount of work done while safely running the plant.

In addressing your question posed in the Notice of Violation concerning the anticipated date that full compliance will be achieved at Peach Bottom, I know for certain that full compliance has been reached as far as I am concerned, and I have every reason to believe that the other operators are also in full compliance. While I know there is nothing I can say that can correct the inexcusable things I did in the past, I can honestly state that I am now totally dedicated to being the best operator that I can be. I am determined not to allow myself to stop at a certain plateau or level of competence as I believe I did in the past. It is my goal to continue driving forward to become a better operator, and to help ensure that the Peach Bottom Power Plant is run safely. I intend to remain professional in my approach to running the plant and hope to be an example to others, especially for the new operators coming into the control room. I think that it is most important that I have an inner commitment to do the best job that I possibly can, and I am determined to discharge the duties and responsibilities that the NRC has given me in a consistently professional manner.

Respectfully submitted,

*Donald G. Falcone*  
Donald G. Falcone

Enclosure: \$500.00 Penalty

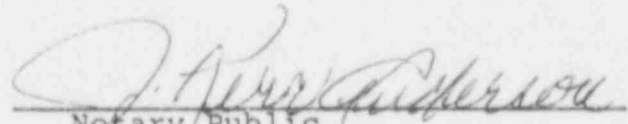
cc: Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :  
COUNTY OF *YORK* : SS:  
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Before me, a Notary Public, personally appeared Donald G. Falcone, 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 26 day of September, 1988.

  
Notary Public

(SEAL)

My Commission expires , 19\_\_.

J. KERR ANDERSON, NOTARY PUBLIC  
LOWER CHANCEFORD TOWNSHIP, YORK COUNTY  
MY COMMISSION EXPIRES APRIL 28, 1991  
Member, Pennsylvania Association of Notaries