

DC 5  
50-277,278

September 23, 1988

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

Re: John S. Deni  
Docket No. 55-8683  
License No. OP-6209-2  
EA 88-09

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

I am in receipt of a Notice of Violation dated August 9, 1988, from James M. Taylor, Deputy Executive Director for Regional Operations. I understand that the Notice was issued to me due to my failure to properly discharge the duties and responsibilities of my Reactor Operator's license at the Peach Bottom Atomic Power Station.

In response to the Notice of Violation, I admit that at times, while on duty in the Control Room, I violated Administrative Procedure A-7, in that I read non-technical reading material and exhibited other inattentive behavior during my shift, including sitting back in my chair. Although I observed others behaving in a similar manner, I covered for them rather than trying to stop their behavior.

Excuses are inadequate to mitigate the seriousness of the violations in which I participated at the Plant; however, I now realize that much of my conduct was caused by the fact that night shift was a difficult assignment for me. It was easier to read at 4:00 a.m. than to stand up and walk around in order to refresh myself. Also, I was frequently dissatisfied with what I perceived to be a never ending series of labor-management confrontations. Because of my frustrations on the job, I became more complacent in my responsibilities and accepted the norm of behavior around me. After a while, I threw up my hands and went with the flow. It became easier to join in than to take a stand.

8810030344 880923  
PDR ADOCK 05000277  
G PNU

IE14  
||

Director, Office of Enforcement  
September 23, 1988  
Page 2

My attitude, however, has changed 180 degrees as a result of the shutdown. I now have a clear understanding of the duties and responsibilities of my license. As a result, I have initiated changes in myself and demanded changes from those around me, in order to assure the safe operation of the Reactor and the Plant as a whole.

The new commitment which I have made is one devoted to quality operations, with a special awareness of how the Plant is operating at any particular moment. Although I tolerated inattentive behavior in the past, I will not tolerate it any more. The PFE course gave me insight into how I had become a part of the problem at Peach Bottom. Instead of taking the responsibility, I blamed my shortcomings on management. I now see the error in my ways, and I accept all responsibility for the quality operation of the Plant. It is clear that being an operator and being attentive in the Control Room is the first step in assuring quality control at Peach Bottom.

I am also encouraged by the fact that things have changed with regard to our relations with Management. Philadelphia Electric Company has placed quality managers on the line. Those individuals are willing to listen and are willing to respond. It's a new way of doing business. It is a way that assures safety and quality of operations. I have learned, through Management, that procedures are developed to be followed. I will neither violate a procedure, nor be rushed into doing anything I do not fully understand. I have no fear of turning in anyone who tries to stand in my way on anything affecting safety.

After the Shutdown Order, I realized that although the Company gives me a job, it is the U.S. Government that gives me the license to operate in that position. I am separated from the Plant as a holder of that license. I am not one of the group. If I do something wrong, the group is not held accountable -- I am. Regardless of what goes on between me and PECO management, the duties and responsibilities under my license are mine alone.

Due to the insight that I have gained from this experience, I have developed techniques to increase my attentiveness and ability to stay alert on the job. I rarely sit static in my chair; now I take periodic opportunities to stand, walk and inspect various panels. In addition, I do technical reading to prepare myself, eventually, for SRO training. I go through procedures SRO's need to know and work on study cards so that I'll be ready,

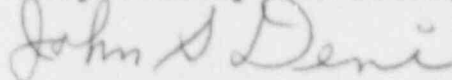
Director, Office of Enforcement  
September 23, 1988  
Page 3

if I can qualify. I also involve myself with Plant paperwork, especially permit work. I have found that in a Plant this size there is always constructive, interesting work to be done. All I needed was the willpower to find it and do it.

I worked hard for this license. It is something that I have accomplished. It is something that I wanted at the time that I received it, and it is something that I still want today. The written reprimand which I received from PECO and this Notice of Violation, are both very serious matters to me. I recognize that I will be terminated if there is a repeat violation. I have had an opportunity to reflect on what the license means to me and what it means to the U.S. Government. I have a special obligation with regard to this license. At this point, my license is more important to me than my job.

The atmosphere at Peach Bottom is different today. The old way of thinking is not acceptable. I can see the changes, and the changes are for the best. Safety is the top priority in the Control Room. Recognizing this, I am committed to doing my job to the best of my ability and I look forward to being a part of a strong and safe future at the Peach Bottom Atomic Power Station.

Respectfully submitted,



John S. Deni

Enclosure: \$500.00 Penalty

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

