

DCS

September 26, 1988

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

Re: Robert R. Hoopes
Docket No. 55-6827
License No. SOP-10336-1
EA 88-15

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

In response to your Notice of Violation and Proposed Imposition of Civil Penalty dated August 9, 1988, please be advised that I hereby acknowledge my license violation, Severity Level II, and I have enclosed payment of my civil penalty of \$800.00. Although I am ashamed to admit it, I was guilty of reading non-technical materials and being less than attentive to my instrumentation. I also admit that as a shift supervisor and senior licensed operator, I was guilty of allowing inattentiveness and distracting activities in the control room.

I believe that the reasons for these violations were a number of factors. Prior to the Shutdown Order, I felt that I was not being encouraged to become a better operator or to take an active role in attempting to improve the operations of the plant. I perceived this from management's lack of a satisfactory response to any complaint or suggestion that was made to them in an attempt to improve plant operations. Another reason that I shirked my responsibilities in enforcing proper control room decorum, why I failed to adequately supervise the control room operators and prevent violations of our licenses, was that I believed I had no control. Shortly after becoming a shift supervisor, I recognized that the men under me would not listen to me and would continue doing what we had all done for years, despite any action that I might have taken. I understand now that this is no excuse for my lack of supervision. I also recognize that I was remiss in fulfilling my responsibilities as shift supervisor by not going up the corporate ladder until I found someone who would back me and allow me to run my shift as I had wanted. An obvious error I made was in not setting the right kind of example for those who worked under me.

I believe that corrective steps have been taken and that everyone at Peach Bottom is now attempting to get to the point

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where we can once again be proud of our job performance. We have a new awareness of our responsibilities and duties as licensed control room operators. We now feel that management will listen to us when we go to them with proposed improvements or suggestions, and I sincerely believe that we are all now actively looking for ways to improve the operations of the plant, instead of just tolerating the existing conditions and going home at the end of our shifts.

When I first became a shift supervisor, I was bypassed, at times, with respect to certain operations, and consequently I was reluctant to take an active part in maintaining proper decorum in the control room. Prior to shutdown, the shift superintendent and the shift supervisor had virtually the same responsibilities, and I had no specific duties that were not also the duties of the shift superintendent. I realize that just because I felt isolated from the others on my shift, that this was no excuse for failing to adequately supervise the shift and ensure that inattentiveness and distracting activities did not take place. All of that has changed now, and I know for a fact that I have the authority to carry out improvements or discipline as I see fit. The new hierarchy within the control room has added authority to the shift supervisor position, and because the new shift managers are looked at in a different light than were the old shift superintendents, I no longer feel isolated by my shift. Since the change in the ladder of authority within the control room, I am often asked to help both the shift operators below me and the shift manager above me, and I am no longer bypassed up or down the ladder.

Another reason that there has been a major change in the way Peach Bottom is operated is that now everybody is trying to improve the quality of the work that we do. With everyone working together it makes it much easier not to revert back to our old habits as everyone is watching and helping one another. The Shutdown Order came as a cold slap in the face to all of us, and there has been a significant turn around in the attitude of the operators since the shutdown. We now understand that we have no margin for error.

I have been trying to work on my leadership skills and develop positive ways to demonstrate my concern for the other operators. For the past two months, I have been trying to increase the awareness of the need for plant safety by performing random safety audits to evaluate the safety implications of certain jobs. Operators call me if they notice an unsafe condition during their shift; for example, they report potential hazards or faulty construction that might affect operations. Depending on the situation, I secure areas until the problem can

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be rectified or recommend needed changes to the individual in charge of the questioned activity.

Other improvements at PECO have also contributed to the new and improved morale of the operations department. We now have twelve shift supervisors where we had only six prior to the shutdown. Additional people are also scheduled to begin training as shift supervisors in the spring of 1989. This has enabled us to work less overtime, and consequently we are in a better state of mind as well as in better physical condition when we report to work. Almost all of the operators have made significant cutbacks on the amount of overtime that they worked this past year; I myself have worked only four hours of overtime this year. Having two shift supervisors on each shift also divides the workload. One of the jobs is not a posted position, and in the event that one of the shift supervisors is unavailable for work, the shift supervisor from the previous shift is not forced to work overtime.

I believe that full compliance with the requirements of our NRC licenses has been achieved, but at the same time I realize that we can never be satisfied with being only adequate control room operators. I realize that we must continue to improve everyday as operators, and having been given the chance to continue as a shift supervisor, I intend to be one of the best. I now have the backing of management and can provide direction to those on my shift knowing that the instructions I give will be followed.

In summary, I admit to not being as attentive to the plant as I should have been. I also admit to allowing operators working under me to be inattentive and doing nothing to correct the situation. All of that has now changed and I am sincere in my commitment to restoring pride in the position of the licensed reactor operator at Peach Bottom. I am sincerely committed to working with the operators to once again make Peach Bottom a place where we can all be proud to say we work.

Respectfully submitted,


Robert R. Hoopes

Enclosure: \$800.00 Penalty

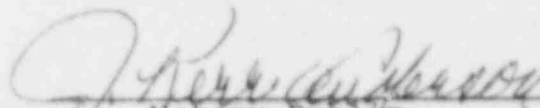
cc: Regional Administrator
U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
 : SS.:
COUNTY OF YORK :

Before me, a Notary Public, personally appeared
Roser R. Hayes, 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
Sept, 1988.


Notary Public

(SEAL)

My commission expires:

J KERR ANDERSON, NOTARY PUBLIC
LOWER CHANCEFORD TOWNSHIP, YORK COUNTY, PA.
BY COMMISSION EXPIRES APRIL 30, 1991
Member, Federal Bar Association of Judges