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September 27, 1988

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

Re: William B. Widener
Docket No. 55-2503
License No. SOP-2909
EA 88-78

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

I was notified, by letter dated August 9, 1988, from James M. Taylor, Deputy Executive Director for Regional Operations, that the Nuclear Regulatory Commission has decided to charge me with a Severity Level II Violation and suggested a \$1,000.00 civil penalty for my actions while serving as Shift Superintendent at the Peach Bottom Atomic Power Station. In particular, I was charged with violating Administrative Procedure A-7 and my former Senior Reactor Operator's License, when, at times, I was inattentive to the instrumentation and controls at the plant and also failed to take corrective action against subordinates who behaved in a similar manner.

During my tenure as Shift Superintendent, I failed to properly discharge the responsibilities of my license and neglected to adequately comply with Administrative Procedure A-7. In particular, on occasion, I read non-technical material and permitted others on my shift to do the same. Also, I failed to take proper disciplinary or corrective action when I saw members of my shift leaning back in their chairs and reclining in a resting position. I am cognizant that my behavior was contrary to my established duties for the control and overall conduct of the operators under my supervision. I am embarrassed by my behavior. As a result of these incidents, my license was surrendered by Philadelphia Electric Company in December of 1987. Because of this, I am no longer in a supervisory position, but serve at the plant as a member of the RAD Waste Support Group.

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Administrative Procedure A-7 details proper operating procedure. Although I was charged with enforcing this procedure on my shift, I was remiss in my compliance and I condoned inattentive behavior by my operators. It was my responsibility to see that this procedure was enforced, and I did not do my job. Instead of acting in a position of leadership, I allowed myself and the others around me to continue to behave in an inappropriate manner. This conduct was accepted and condoned by me for years. Many times, I condoned it because we were short-staffed and the operators were working too many hours. I also permitted this conduct because my complaints about working conditions were not addressed by management. As a result, I became discouraged over what I saw as a lack of support.

Regardless of the reasons for my behavior, it was wrong to conduct myself in such a manner, particularly when I was in a position of leadership. I did not do my job. I should have responded each time that I saw a violation by one of my operators; instead, I turned my back and let the problem grow. Rather than making a difference, I contributed to the unsafe environment. Management was clear in its expression of proper procedures; there were no mixed messages with regard to the performance of A-7. I was responsible, but I failed to properly discharge that responsibility.

I now realize that I had an obligation to set standards of behavior. I worked hard for my license and I was proud to have it. Now, I no longer have the privilege of serving as a Senior Operator. The lessons that I have learned from this experience will remain with me for the rest of my career at Peach Bottom. Recognizing my failures, I accordingly, enclose my payment of the imposed penalty. I admit my omissions and respectfully accept my punishment.

Respectfully submitted,

William B. Widener

William B. Widener

Enclosure: \$1,000.00 Penalty

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

