

September 21, 1988

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

Re: Joel Michael Gribble  
Docket No. 55-60781  
License No. OP-10417  
EA 88-13

Dear Sir:

SUBJECT: REPLY TO NOTICE OF VIOLATION

On February 17, 1988, I attended an enforcement conference to address my behavior as a reactor operator at the Peach Bottom Atomic Power Station Units 2 and 3. The subject was my inattentiveness while on shift prior to March 31, 1987. As a result of the enforcement conference, I received a Notice of Violation and Proposed Imposition of Civil Penalty in the amount of \$500.00. My license violation was classified at Severity Level III. This Reply is my admission of my inattentiveness to instrumentation and controls, in violation of Peach Bottom Administrative Procedure A-7 and my reactor operator license.

While I was assigned to the controls of Peach Bottom Units 2 and 3, I did not spend my time between work assignments in a constructive manner. I would sit back, put my feet up and read magazines or newspapers. I would assume a slouched position and close my eyes. I engaged in horseplay which distracted myself, my fellow operators and my supervisor, and I allowed others to engage in distracting activities (playing a video game and a golf game) without stopping them or reporting them.

As a recently licensed operator, I certainly knew that my conduct was wrong. If someone in authority came into the Control Room, I would slip my newspaper in a drawer, or if I were leaning back with my feet up, I would sit up properly. When I was directed by management to stop this behavior, as I was from time to time, I would watch others to see if they resumed improper behavior, and then I would go back to doing

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it myself. I had the courage to disobey orders because I thought nothing would happen to me since I had so much company. I obviously did not understand the safety implications of my conduct or give the respect to procedural compliance and to my management's directives that the public had the right to expect of me.

I learned about the consequences of an inadequate job performance immediately prior to the shutdown order. I was involved in a scram on March 17, 1987, where I missed certain key parameters that could have prevented the scram. This scared me so badly that I realized I had to do a complete re-evaluation of how I was doing my job. The Shutdown Order hammered the point home by letting everyone know that I had not done the job I was expected to do in the Control Room.

I cannot say that I am grateful for this nightmare, but no one can say that I have not changed 100% for the better. I have taken numerous corrective steps to ensure that I do not repeat any of the practices that previously caused me to jeopardize safety. The most immediate change was in my personal habits. Prior to shutdown, I had volunteered for several outside coaching activities. These obligations had become too demanding of my time, so I eliminated them to make sure that I would get more sleep. I also paid attention to the circadian rhythm material given to me during PPE training, and I ended up changing the way I eat. I have done much better at adjusting to the new shift rotation than I first thought I would. Apparently, going from afternoon shift to night shift is much easier on me, because I prefer the gradual change in sleep habits that it gives me.

The team concept has also made a difference in my attitude. I used to hate the fact that I could never work with the same people for any length of time. Now when I report for duty I know that there is an entire group who will care about how I look and act on shift. We give each other a lot of helpful comments and a lot of support.

After shutdown, I realized that we were too isolated from other nuclear power plants. This occurred to me after I read the INPO report which stated we were far behind other plants in Control Room decorum. I, obviously, had not paid enough attention to what was going on at other plants. I decided I had better pay more attention, so I began reading materials made available by our training department and by other sources, including INPO and the NRC. I try to go

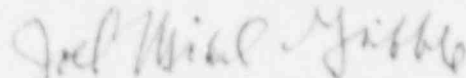
Director, Office of Enforcement  
September 21, 1988  
Page 3

through as much of this material as I can, and discuss it with my team.

Finally, no one knows better than me that I have to watch my assigned reactor area intently. I have to stand each shift knowing that something could go wrong and it is my responsibility to be right there to correct it. I have trained myself to keep interested by performing numerous small tasks. I make sure to update information tags, removing outdated ones to reduce clutter. I also do small cleaning jobs on the panel, and I police my assigned area to maintain professional housekeeping standards. Little things like this really help you focus on your professionalism.

Becoming a licensed reactor operator was a great accomplishment for me. My immediate plan is to become a Chief Operator, and by 1990, I hope to qualify for Senior Reactor Operator's training. I want the experience of running a shift before I become a supervisor; moreover, I want to delve into permits and blocking systems more than I can as a reactor operator. Over the past year and a half I have made the kind of gains in professionalism that are necessary to prove myself worthy of my goals. I promise that I will continue to learn everything I can about this Plant so that I can continue as a credit rather than an embarrassment to this industry.

Respectfully submitted,



Joel Michael Gribble

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 *Dauphin* : SS.:

Before me, a Notary Public, personally appeared  
JOEL MICHAEL GRIBBLE, 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 *24* day of  
*September*, 1988.

*Bernice Jennings*  
Notary Public

(SEAL)

My commission expires:

**Bernice Jennings, Notary Public**  
**Harrisburg, Dauphin County**  
**My Commission Expires April 30, 1992**