

From: <VMBLANCH@aol.com>  
To: WND2.WNP3(jaz),udl.internet3("JAZWOL@aol.com")  
Date: 5/18/96 12:40pm  
Subject: Letter of May 13, 1996

John:  
The following responds to your letter of 5/13/96

PAUL, John Zwolinski should go to Willis Frick (who manages the Nuclear Safety Concerns Group) at the SONGS site and ask for a copy of document OIR ITEM REPORT 92-049. A copy should be in the CDM (Corporate Document Management) Center on site. Document DBD-S023-TR-AA also relates to this problem and should be in the CDM Center also. A group by the name of Design Bases Documentation was working on this problem but they were the first group to be

dissolved and layed off when pressure was put on SONGS to reduce operating cost. As a result I submitted a Nuclear Safety Concern (NSC) regarding LOCA and offsite dose calculations. I do not have a record of how the Concern was resolved. For many Nuclear Safety Concerns I never received a response because I asked that to insure anonymity the response to the Concern should be posted

on the various bulletin board around the SONGS site rather than sent directly to me. However Willis Frick had a policy of not posting responses to NSC's on

bulletin boards. The NRC should be able to get any thing they need from Mr. Frick. I remember getting hell from Rich St. Onge and Phil Podruski for spending time in CDM looking for documents related to this problem. I was told to stay focused only on those specific tasks they had assigned to me and not to go looking for problems. However I was responsible for coordination of a large group of "Site Problem Reports" so I felt it was OK to do a little research in CDM.

CC: udl.internet3("gmills1@ix.netcom.com","102502.3125...)

May 31, 1996

Paul M. Blanch 135 Hyde Road  
West Hartford, CT. 06117

Dear Mr. Blanch,

You've recently made public mention about the Internal Auditor who conducted the investigation of some of your ex-employees and you've stated publicly that he falsified his credentials (or something to that effect). If you are referring to me, then I am confused. I thought you pursued that about five years ago and learned for yourself that I am not only a CPA but was also using my credentials appropriately. It was documented in a letter to you on November 15, 1990 from the State Board of Accountancy - Executive Director David Guay (Docket: 90-26).

I know that you are troubled about many things but I really think you can delete this one from your list. I would be happy to provide you with copies of documentation of my credentials since I am very proud of such accomplishments. I achieved a BS-Accounting from Boston College, MBA from University of Hartford, CPA in the State of Connecticut, CFE (Certified Fraud Auditor) and I am a member in good standing with the AICPA (American Institute of CPA's). Except for the MBA, all these were in place when I was involved with the investigation back in 1989.

I respect your right to free speech but request that you be more careful to be truthful and refrain from statements that I consider defamatory. If you are not sure, why not call me and see if I could satisfy any questions that you have about my background. Thank you.

Yours truly,

Allen L. Pollock  
203-665-3732

TO: Arnold Roby

FROM: P. M. Blanch

SUBJECT: NUP-23 Employee Grievances and Complaints  
Misrepresentation of Individual Professional  
Qualifications by the Manager of Internal Auditing

During late 1989, my Group was apprised that we were about to undergo an audit by NU's Internal Auditing Department. The identified topics of the audit were alleged abuse of time and expense sheets and also a possible "Conflict of Interest" related to my work with EPRI.

The audit was led by Allen L. Pollack, Manager of Internal Auditing Department. On the business cards presented to several members of my group at the commencement of the audit, Mr. Pollack represented himself as a CPA or Certified Public Accountant. I was also informed that Mr. Pollack is also a

Certified Internal Auditor and also a Certified Fraud Examiner.

Throughout the audit, Mr. Pollack conducted himself in an extremely unprofessional manner by making false statements and eventually coming to conclusions which could not be supported by any facts. Information supplied to Mr. Pollack in support of my employees position was completely ignored when Mr. Pollack developed his conclusions and recommendations. Further I informed Mr. Pollack of a similar situation which occurred in 1985 and that management should insure consistency in their actions. This request was also ignored.

After some initial investigation via phone calls to the States of Connecticut and Massachusetts we determined the Mr. Pollack was not a licensed CPA in either of these states. The Secretary of States Office did inform me that Mr. Pollack did take the initial CPA exam but never fulfilled the requirement of three years of public accounting experience or the completion of the required ETHICS exam.

On April 17, 1990, I requested [in writing] the Secretary of State to look into this matter and determine if Mr. Pollack was authorized to use the title of CPA on an NU business card.

After numerous phone calls to Mr. David Guay, Executive Secretary for the State Board of Accountancy, I finally received a response dated November 15, 1990. Mr. Guay confirmed that Mr. Pollack did not possess any certification as a CPA and never met the other requirements or registered as a licensed CPA as implied by his NU business card. A strict interpretation of Chapter 389 of the Connecticut General Statutes concluded that there was no violation of the law.

On November 15, 1990 the State of Connecticut, in a letter, "cautioned" Mr. Pollack that the use of CPA was limited and could not be used "...to practice public accounting without holding a valid licence as a CPA and a current and valid permit to practice."

This is similar to representing myself as a Ph.D, Professional Engineer, or Attorney without possessing either a License or the professional experience. It is probably not against the law but would be considered unethical by most standards and responsible corporations.

To have the MANAGER of Internal Auditing advertising false professional credentials is preposterous behavior and completely beyond comprehension for any individual in this capacity.

It is even possible that Mr. Pollack misrepresented his qualifications to obtain his initial employment and his present position.

In accordance with the guidance on NUP-23 I am requesting the following actions:

1. Determine if it is consistent with NU's accepted practice and ethical policies to falsify the qualifications and licenses of the Manager of Internal Auditing and to advertise these false credentials to individuals within the organization.

2. Determine if Mr. Pollack also misrepresented his qualification at the time of employment and/or promotion(s).
3. If Mr. Pollack did knowingly misrepresent his qualifications by the use of CPA, then I can only suspect that he may have also misrepresented or distorted the relevant facts of the audit conducted of my group. In light of this, I believe that the results and conduct of the audit should be reviewed by an outside independent individual. The selected individual should be jointly agreed upon between the affected individuals and NU management.
4. If #3 is not acceptable to management, then the disciplinary action taken against the two individuals (Caccavale and Bhatt) should be rescinded.
5. Take appropriate disciplinary action against Mr. Pollack for the falsification and/or misrepresentation of his qualifications.
6. Apprise me as to what, if any, disciplinary action has been taken against Mr. Pollack. I will treat this information as company confidential and only inform the affected individuals that action has been taken consistent with the company practices.

Enclosed is a copy of all communication between myself and the State of Connecticut related to this matter.

As this issue is outside the scope of the Generation Engineering Department, I am requesting that this issue bypass the first two steps of NUP-23 and proceed directly to step #3.

Due to your absence, I do not expect a response within the required ten (10) working days, however I believe that a response to step #3 would be appropriate by March 29, 1991.

cc: Eric Debarba  
Barry Ilberman