

AFFIDAVIT OF JACK DOYLE

My name is Jack Doyle. My address is P. O. Box 64, Turnpike Station, Shrewsbury, Massachusetts 01545.

I testified, under subpoena, as a witness in the operating license hearings for the Comanche Peak Steam Electric Station before the Atomic Safety and Licensing Board in September 1982.

I have read the 1/11/83 CASE's Motion for Leave to File Response and reviewed CASE Attachment 2 thereto, which is titled An open letter from an American dissident. That document was prepared by me personally and sent to CASE, the Intervenor in the Comanche Peak proceedings. It expresses my feelings about blackballing and the current practices within the nuclear industry and regarding the way nuclear power plants in this country are currently being constructed. The statements therein are true and correct to the best of my knowledge and belief.

I am convinced that I have been blackballed or blacklisted because I testified at the Comanche Peak hearings. I have been unable to find a job since that time, although I have applied for positions where other people were being hired. I believe I can prove that I have been blacklisted and will be pursuing this further with the Department of Labor. However, I also believe the Nuclear Regulatory Commission should take immediate and stringent measures to put a stop to this insidious practice. Until such action is taken, nuclear plants in this country will continue to be built unsafely and the ultimate result will be future possibly catastrophic accidents at operating nuclear plants.

The Nuclear Regulatory Commission's current "confidentiality" and "protection" for whistleblowers and witnesses is a farce and a charade, as demonstrated by what has happened to me since I testified and by what has happened to other CASE witnesses such as Chuck Atchison.

In five months the NRC have been unable to refute any of the more than one dozen generic safety violations which I entered as testimony, backed up with documented specific examples. My deposition was taken on August 19 and 20, 1982, and entered as testimony in the September operating license hearing. I am convinced that even now the utility is correcting and covering up the specific supports which I documented in my testimony and that by the time the NRC makes its report about my allegations, they will say that the Applicants have already corrected the problems I pointed out and that everything's fine now. This will leave all the other numerous supports unchanged and still defective, but may enable the utility to go ahead and get its operating license.

I have documentation to prove that fatal engineering faults exist, on a vast scale, in the safety systems of (13) nuclear units, including Comanche Peak. I have in my possession irrefutable documentation to substantiate all of my allegations, including blackballing and the dozens of generic errors in engineering fundamentals, laws and codes:

(1) I have over 200 slides of specific drawings of unsafe supports, and the documentation to back up the existence of the faults.

(2) I have models to visually display the instability which many supports are subject to, and this is when the up and downstream supports are considered as offering stabilizing contributions.

(3) I have photos of supports that are in violation of codes and fundamentals.

(4) I am also aware of unqualified individuals who while masquerading as engineers are fouling up the safety components which are intended to protect the health and safety of the public, including the names of many of these individuals.

(5) I have other documentation regarding the faults to be found in nuclear

power plants and the incompetence of many of the self-proclaimed engineers and management.

All of the above five items pertains to seven (7) nuclear sites and indicates that a total breakdown of technology exists in the industry and has been replaced by a system of deceit, cover-up, grease and selection of personnel on the basis of their passivity.

In over thirty (30) years in structural engineering (the last six of which are in the nuclear industry), I have never seen or heard of such flagrant violations of Engineering fundamentals, codes and laws. Beyond this, the frantic efforts at cover-up and the means being employed to insure the cover-up would make the K.G.B. look like a kindly group of social workers.

*Jack Doyle*  
\_\_\_\_\_  
Jack Doyle  
Date: Jan 17 1983

STATE OF MASSACHUSETTS

COUNTY OF Worcester

On this, the 17 day of Jan, 1983, personally appeared Jack Doyle, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes therein expressed.

Subscribed and sworn before me on the 17 day of Jan, 1983.

*Barbara A. Kontny*  
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Notary Public in and for the County of  
Worcester, Massachusetts

My Commission Expires: 4/13/83

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

APPLICATION OF TEXAS UTILITIES  
GENERATING COMPANY, ET AL. FOR  
AN OPERATING LICENSE FOR  
COMANCHE PEAK STEAM ELECTRIC  
STATION UNITS #1 AND #2 (CPSSES)

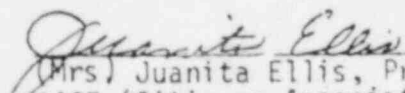
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Docket Nos. 50-445  
and 50-446  
DOCKETING & SERVICE  
BRANCH

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of  
CASE's Motion for Board Order for NRC Staff and Applicants to Provide Documents  
and CASE's Letter Forwarding Affidavit of Jack Doyle  
have been sent to the names listed below this 18th day of January, 1983  
by: Express Mail where indicated by \* and First Class Mail elsewhere.

- \* Administrative Judge Marshall E. Miller  
U. S. Nuclear Regulatory Commission  
Atomic Safety and Licensing Board  
Washington, D. C. 20555
- \* Alan S. Rosenthal, Esq., Chairman  
Atomic Safety and Licensing Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- \* Dr. Kenneth A. McCollom, Dean  
Division of Engineering, Architecture,  
and Technology  
Oklahoma State University  
Stillwater, Oklahoma 74074
- \* Dr. W. Reed Johnson, Member  
Atomic Safety and Licensing Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- \* Dr. Richard Cole, Member  
Atomic Safety and Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- \* Thomas S. Moore, Esq., Member  
Atomic Safety and Licensing Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- Nicholas S. Reynolds, Esq.  
Debevoise & Liberman  
1200 - 17th St., N. W.  
Washington, D. C. 20036
- Atomic Safety and Licensing Appeal Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- Marjorie Ulman Rothschild, Esq.  
Office of Executive Legal Director  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- Docketing and Service Section  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- \* Ms. Lucinda Minton, Law Clerk  
Atomic Safety and Licensing Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555
- David J. Preister, Esq.  
Assistant Attorney General  
Environmental Protection Division  
P. O. Box 12548, Capitol Station  
Austin, Texas 78711
- Mr. John Collins, NRC Region IV,

  
Mrs. Juanita Ellis, President  
CASE (Citizens Association for  
Sound Energy)