

TERA

March 18, 1983

Mr. J. G. Keppler
Administrator, Region III
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Mr. D. G. Eisenhut
Director, Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket Nos. 50-329 and 50-330
Midland Nuclear Plant - Units 1 and 2
Overview of the Midland Construction Completion Program

TERA Corporation has been informed by Mr. James W. Cook, Vice President, Consumers Power Company (CPC) that the Corporation is under consideration for management and implementation of a program to independently overview the Midland Construction Completion Program. We have been requested to submit the following information to the NRC for review:

- Affidavits attesting to TERA's corporate independence and the independence of individuals who may participate in the CCP Overview program;
- Professional qualifications of individuals who may participate in the CCP Overview program.

Mr. John W. Beck, Vice President of TERA Corporation and Principal-in-Charge of TERA's team which may conduct the Midland program has signed an affidavit on behalf of TERA Corporation and its subsidiaries which provides a statement of corporate independence (Attachment 1).

Signed affidavits for members of TERA's team are attached (Attachment 2). In the event that additional personnel are required to meet project objectives and are assigned to the team, TERA Corporation will obtain affidavits from these individuals as well.

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Mr. J. G. Keppler
Mr. D. G. Eisenhut

2

March 18, 1983

TERA proposes that a core of senior level personnel principally involved with the Midland Independent Design and Construction Verification (IDCV) program participate in the Midland CCP Overview for the purpose of maximizing the benefits gained to date within the IDCV relative to the understanding of the complex design and construction evolution and chains, project experience, and technical details of the design and construction efforts. Accordingly, it is proposed that the Midland IDCV project organization, management structure, and procedures be maintained and appropriately modified to meet the CPP Overview project objectives.

Mr. Martin Jones will be assigned responsibility for direction of site activities. Mr. Jones has previously served as Manager of Construction of the Summer Nuclear Plant for the South Carolina Electric and Gas Company. He is eminently qualified for this assignment with over 22 years of nuclear power plant experience.

The proposed CCP Overview staff has been selected based upon their unique technical, construction, and project management qualifications and experience. Key personnel are listed along with a short description of their areas of expertise, number of years of experience, and highlights of their previous employment (Attachment 3). Resumes have been provided previously to the NRC under separate cover in Appendix C of the Project Quality Assurance Plan, Revision 2, for the Midland IDCV program. (Reference: letters from Mr. Howard A. Levin to Mr. J. G. Keppler and Mr. D. G. Eisenhut dated February 9, 1983 and February 17, 1983.)

TERA Corporation is committed to providing an independent, comprehensive, and integrated assessment of the quality of the Midland plant through the activities currently in progress within the Midland IDCV Program. Consideration of the CCP Overview efforts within the Midland IDCV program will provide overall enhancement in meeting these objectives.

We are prepared to answer any questions that you may have relative to these matters. Please contact me at (301) 654-8960 or Mr. John Beck at (214) 871-1075.

Sincerely,



Howard A. Levin
Project Manager

cc: J. Cook, CPC
G. Keeley, CPC
D. Hood, NRC

Enclosures



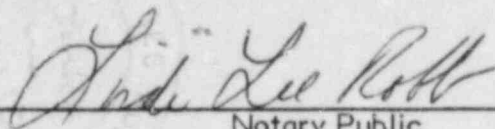
TERA CORPORATION

Mr. J. G. Keppler
Mr. D. G. Eisenhut

3

March 18, 1983

Sworn and Subscribed Before Me This 18th Day of March 1983



Notary Public

My Commission Expires My Commission Expires July 1, 1985

HAL/djb



TERA CORPORATION

ATTACHMENT I

CORPORATE AFFIDAVIT STATEMENT
OF INDEPENDENCE

STATEMENT OF CORPORATE INDEPENDENCE

AFFIDAVIT OF JOHN W. BECK ON BEHALF OF TERA CORPORATION AND ITS SUBSIDIARIES

My name is John W. Beck. I am a Vice President of TERA Corporation. This statement is made on behalf of TERA Corporation and its subsidiaries.

TERA Corporation is under consideration for conducting an Independent Overview of the Construction Completion Program (CCP) at the Midland Nuclear Plant site. I will serve in the capacity of Principal-in-Charge of the team which will conduct the CCP Overview.

The criteria for corporate independence and individual independence of personnel assigned to work on the CCP Overview program are set forth in a letter from Nunzio J. Palladino, Chairman, U.S. Nuclear Regulatory Commission (NRC), to the Honorable John D. Dingell, Chairman, Committee on Energy and Commerce, U.S. House of Representatives, dated February 1, 1982.

TERA Corporation has determined that the Corporation and individual members of the CCP Overview team satisfy the following criteria:

1. TERA Corporation and individuals assigned to the Midland CCP Overview program do not have any direct previous involvement with the Midland activities that they will be reviewing.
2. TERA Corporation and individuals assigned to the Midland CCP Overview program have not been previously hired by Consumers Power Company, Bechtel, or Babcock and Wilcox to perform design, construction or quality work relative to the Midland activities that they will be reviewing.
- *3. TERA Corporation and individuals assigned to the Midland CCP Overview program have not been previously employed by Consumers Power Company.
4. The individuals assigned to work on the Midland CCP Overview program do not have present household members employed by Consumers Power Company.
5. The individuals assigned to work on the Midland CCP Overview program do not have any relatives employed by Consumers Power Company.

*With the exception of the Midland Independent Design and Construction Verification Project.

6. TERA Corporation and individuals assigned to work on the Midland CCP Overview program do not own or control significant amounts of Consumers Power Company stock.

TERA Corporation has obtained affidavits for each individual currently assigned to the Midland CCP Overview program team. In the event that additional personnel are assigned to the team, TERA Corporation will obtain affidavits from these individuals as well.

Signed

John W. Beck

Sworn and Subscribed Before Me This 17th Day of March 1983

Terry Gamble
Notary Public

My Commission Expires _____

TERRY GAMBLE, Notary Public
in and for the State of Texas
My Commission Expires 8-17-86

ATTACHMENT 2

**INDIVIDUAL AFFIDAVIT STATEMENTS
OF INDEPENDENCE**

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF John Beck

My name is John Beck. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project,* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

John W Beck

Sworn and Subscribed Before Me This 17th Day of March 1983

Terry Gamble
Notary Public

My Commission Expires _____

TERRY GAMBLE, Notary Public
in and for the State of Texas
My Commission Expires 8-17-86

*With the exception of the Midland Independent Design and Construction Verification Project.

Murray Savings Money Market Fund

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Howard A. LEVIN

My name is Howard A. LEVIN. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached.* I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

* MERRILL LYNCH CMA
PACE FUND

Howard A. Levin

Sworn and Subscribed Before Me This 17th Day of March 1983

And LeRobb
Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Mark Polit

My name is Mark Polit. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

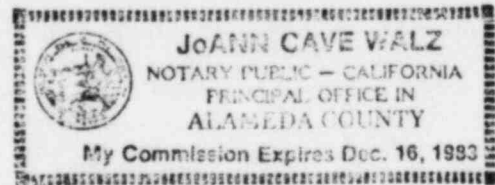
Signed

* with the exception of the Midland Independent Design and Construction Verification Program.

Mark Polit

Sworn and Subscribed Before Me This 17 Day of March 1983

JoAnn Cave Walz
Notary Public
My Commission Expires 12/16/83



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Curt Staley

My name is Curt Staley. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project,* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel,* or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Curt Staley

Sworn and Subscribed Before Me This 17th Day of March 1983

Terry Gamble
Notary Public

My Commission Expires TERRY GAMBLE, Notary Public
in and for the State of Texas
My Commission Expires 8-17-86

** Except as follows:

- 1976-1977 Engineering Supervisor and Deputy Project Engineer, Bechtel Power Corporation, Gaithbrg, MD, for the Dickerson Steam Generation Plant, Potomic Electric Power Company.
- 1968-1974 Senior Engineer and Group Leader, Bechtel Power Corporation, San Francisco, CA, for the Limerick Generating Station, Philadelphia Electric Company.

*With the exception of the Midland Independent Design and Construction Verification Project.

Merrill Lynch Ready Assets Trust

Murray Savings Money Market Funds

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Frank Dougherty

My name is Frank Dougherty. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

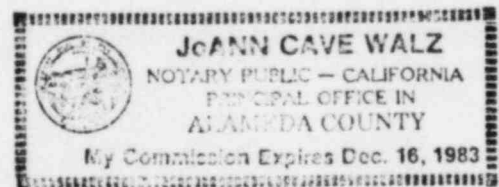
Signed

* with the exception of the
Midland Independent Design
and Construction Verification
Program.

Frank R. Dougherty

Sworn and Subscribed Before Me This 17 Day of March 1983

JoAnn Cave Walz
Notary Public
My Commission Expires 12/16/83



Mutual Funds

Merrill Lynch CMA Money Trust
Kemper Money Market
Daily Interest Fund

Mathera Fund

Energy Fund

20th Century Growth Fund

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF RICHARD P. SNAIDER

My name is RICHARD P. SNAIDER. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Richard P. Snider

Sworn and Subscribed Before Me This 17th Day of March 1983

Arde Lee Rott
Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

SNAIDER

MUTUAL FUNDS

ENERGY FUND

MERRILL-LYNCH HIGH INCOME BOND FUND

AMERICAN GENERAL PACE FUND

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF LIONEL D. BATES

My name is Lionel D. Bates. I am employed by TERA Corporation
as Lead Technical Reviewer

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

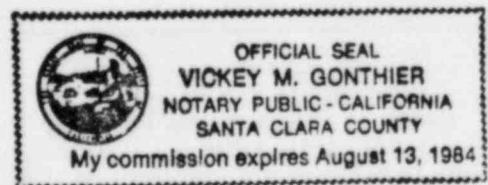
Signed

Lionel D. Bates

Sworn and Subscribed Before Me This 17th Day of March 1983

Vickey M. Gonthier
Notary Public

My Commission Expires 8-13-84



*With the exception of the Midland Independent Design Construction Verification Program.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF MARTIN B. JONES, JR.

My name is Martin B. Jones, Jr.. I am employed by TERA Corporation
as Associate, Lead Site Activities

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Martin B. Jones, Jr.

Sworn and Subscribed Before Me This 17th Day of March 1983

Betty J. Muth
Notary Public

My Commission Expires 10/10/84

* I have served as a consultant to Becon Construction Co., a subsidiary of Bechtel, during 1982. None of this work was related to the Midlands project, or any other nuclear work.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Donald Davis

My name is Donald Davis. I am employed by TERA Corporation
as Member Senior Review Team

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

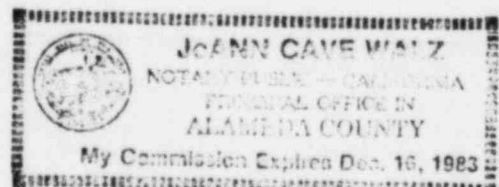
Don K Davis

Sworn and Subscribed Before Me This 16th Day of March 1983

Joann Cave Walz
Notary Public

My Commission Expires 12/16/83

* with the exception of the
Midland Independent Design
and Construction Verification
Program



Funds in which D.K. Davis has an interest

1. Franklin Tax-Free - California
2. Inter Capital Liquid Asset
3. TERA Deferred Compensation (Retirement)

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF WILLIAM J. HALL

My name is William J. Hall. I am employed by TERA Corporation
as Consultant.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project,*or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel,** or Babcock and Wilcox.

* with the exception of the Midland Independent
Design and Construction Program.

Signed

** a son-in-law employed by Bechtel, Gaithersburg, MD

William J. Hall
William J. Hall

Sworn and Subscribed Before Me This 17th Day of March 1983

Lois A. Haller
Notary Public

My Commission Expires 2/6/85

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Robert Wilson

My name is Robert Wilson. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

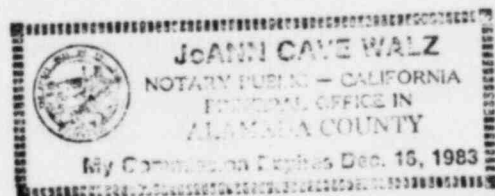
* with the exception of the
Midland Independent Design
and Construction Verification
Program.

Signed

Robert Wilson

Sworn and Subscribed Before Me This 17th Day of March 1983

JoAnn Cave Walz
Notary Public
My Commission Expires 12/17/83



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Robert Cudlin

My name is Robert Cudlin. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached.** I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.**

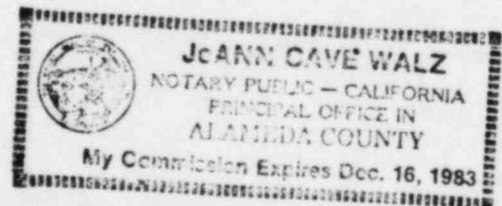
Signed

* with the exception of the Midland Independent Design and Construction Verification Program.

Robert J. Cudlin

Sworn and Subscribed Before Me This 17 Day of March 1983

Joann Cave Walz
Notary Public
My Commission Expires 12/16/83



- * First Jersey Securities
- ** Brother, Joseph Cudlin, is currently employed by B&W as Manager, Analysis Technology.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Henry I. George

My name is Henry George. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Henry I. George

Sworn and Subscribed Before Me This 17th Day of March 1983

John Lee Platt
Notary Public

My Commission Expires My Commission Expires July 1, 1984

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Joseph Martore

My name is J. MARTORE. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Joseph Martore

Sworn and Subscribed Before Me This 18th Day of March 1983

David La Roff
Notary Public

My Commission Expires My Commission Expires July 1, 1985

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Robert C. Snyder

My name is Robert C. Snyder. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Robert C. Snyder

Sworn and Subscribed Before Me This 17th Day of March 1983

Linda Sue Robb
Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Michael B. Aycock

My name is Michael B. Aycock. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Michael B. Aycock

Sworn and Subscribed Before Me This 17th Day of March 1983

Linda Lee Robb
Notary Public

My Commission Expires My Commission Expires July 1, 1985

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Christian Mortgat

My name is Christian Mortgat. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

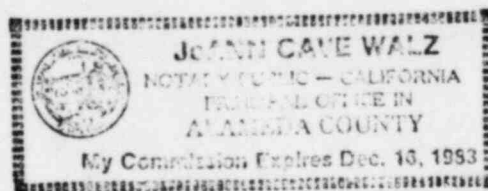
* with the exception of the
Midland Independent Design
and Construction Verification
Program.

Christian Mortgat

Sworn and Subscribed Before Me This 17 Day of March 1983

Joann Cave Walz
Notary Public

My Commission Expires 12/16/83



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Jorma Arros

My name is Jorma Arros. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

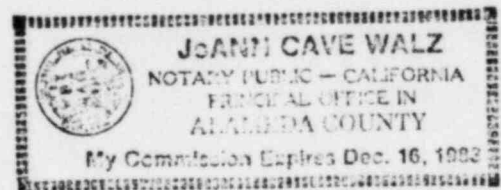
* with the exception of the Midland Independent Design and Construction Verification Program.

Jorma Arros

Sworn and Subscribed Before Me This 17 Day of March 1983

JoAnn Cave Walz
Notary Public

My Commission Expires 12/16/83



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Kenneth W. Campbell

My name is Kenneth W. Campbell. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Kenneth W. Campbell

Sworn and Subscribed Before Me This 18th Day of March 1983

Linda Lee Robb
Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Normand A. Berube

My name is Normand A. Berube. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Normand A. Berube

Sworn and Subscribed Before Me This 18th Day of March 1983

Linda Lee Robb
Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Frederick Berthrong

My name is Frederick Berthrong. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company*. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

* with the exception of the
Midland Independent Design
and Construction Verification
Program.

Frederick Berthrong

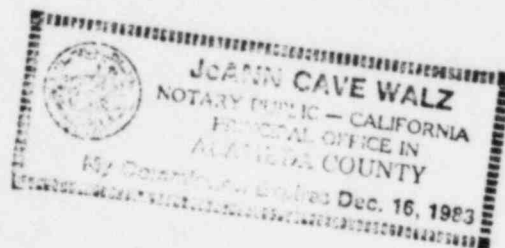
* I was employed by Bechtel Power Corporation
(Jan. 1972 - Sept 1977) but performed no services on
the Midland Project.

Sworn and Subscribed Before Me This 17 Day of March 1983

Joann C. Walz

Notary Public

My Commission Expires 12/6/83



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Richard MacDonald

My name is Richard MacDonald. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

*

Signed

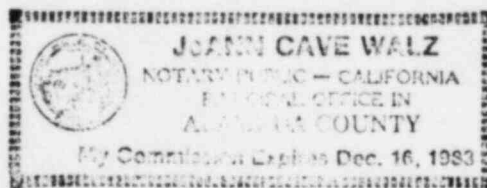
* with the exception of the Midland Independent Design and Construction Verification Program.

Richard R. MacDonald

Sworn and Subscribed Before Me This 17th Day of March 1983

J. C. Daly
Notary Public

My Commission Expires 12/16/83



* I was employed by Bechtel Power Corporation (1971-79) for 8 1/2 years as Mechanical Engineering Supervisor Assistant to the Manager of Engineering, and project Engineer on small projects. I was never directly involved on the Midland Project or with Consumers Power or Babcock and Wilcox
RPM

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF DONALD B. TULODIESKI

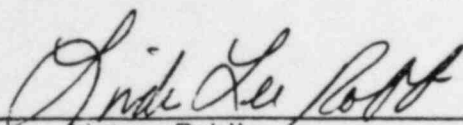
My name is DONALD B. TULODIESKI. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company.** I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed



Sworn and Subscribed Before Me This 17th Day of March 1983


Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

** Employed by Babcock & Wilcox Co. from 1973 to 1978. Final Position was Project Manager for Toledo Edison, Davis Besse Units.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Gary Smith

My name is Gary Smith. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project,* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Gary Smith

Sworn and Subscribed Before Me This 17th Day of March 1983

Sandra Vinson
Notary Public

My Commission Expires 2-17-85

SANDRA VINSON, Notary Public
in and for the State of Texas
My Commission Expires 2-17-85

*With the exception of the Midland Independent Design and Construction Verification Project.

A. G. Edwards, Daily Cash Accumulation Fund

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Douglas Witt

My name is Douglas Witt. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

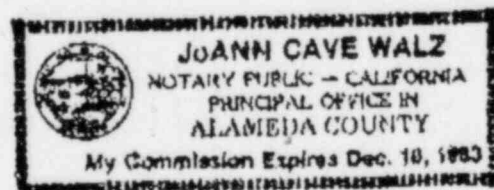
Signed

* with the exception of the
Midland Independent Design
and Construction Verification
Program.

Douglas Witt

Sworn and Subscribed Before Me This 18 Day of March 1983

Joann Cave Walz
Notary Public
My Commission Expires 12/16/83



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Randy Cleland

My name is Randy Cleland. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project,* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Randy Cleland

Sworn and Subscribed Before Me This 17th Day of March 1983

Terry Gamble
Notary Public

My Commission Expires _____

TERRY GAMBLE, Notary Public
in and for the State of Texas
My Commission Expires 8-17-86

*With the exception of the Midland Independent Design and Construction Verification Project.

University Savings Association Money Master Fund

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF George J. Trigilio, Jr.

My name is George J. Trigilio, Jr.. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

George J. Trigilio, Jr.

Sworn and Subscribed Before Me This 18th Day of March 1983

André Guérette
Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Stephen Schreurs

My name is Stephen Schreurs. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Stephen F Schreurs

Sworn and Subscribed Before Me This 17th Day of March 1983

Dwight Lee Robt
Notary Public

My Commission Expires My Commission Expires July 1, 1985

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Farzin Ramezanbeigi

My name is Farzin Ramezanbeigi. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

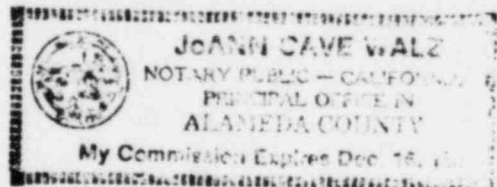
* with the exception of the
Midland Independent Design
and Construction Verification
Program.

Signed

Farzin Ramezanbeigi

Sworn and Subscribed Before Me This 17 Day of March 1983

JoAnn Cave Walz
Notary Public
My Commission Expires 12/16/83



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF CHRISTIAN NELSON

My name is CHRISTIAN NELSON. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Christian Nelson

Sworn and Subscribed Before Me This 17th Day of March 1983

Linda Lee Robb
Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Monte J. Wise

My name is Monte J. Wise. I am employed by TERA Corporation
as Asst. Tech. Reviewer.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project,* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

* with the exception
of the Midland independent
design and construction
verification program,

Signed

Monte J. Wise

Sworn and Subscribed Before Me This 17 Day of March 1983

Charles H. Gardner
Notary Public

My Commission Expires at death

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Mehmet Celebi

My name is Mehmet Celebi. I am employed by TERA Corporation
as Associate Technical Reviewer

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company.** I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

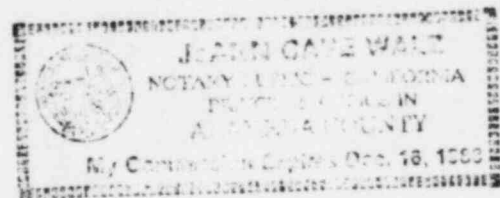
Signed

*except for the Midland
Independent Design and
Construction Verification
Program at TERA.

Mehmet Celebi

Sworn and Subscribed Before Me This 17 Day of March 1983

J. C. Daly
Notary Public
My Commission Expires 12/16/83



**I was employed by Bechtel Power Corporation, San Francisco between January 1978 to May 1979 as an Engineering Specialist and between August 1982-December 1982 on a Casual Project Engineer status.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF ALBERT MANTONE

My name is ALBERT MANTONE. I am employed by TERA Corporation as ASSOC. TECHNICAL REVIEWER.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Albert V. Mantone

Sworn and Subscribed Before Me This 17 Day of March 1983

[Signature]
Notary Public

My Commission Expires MY COMMISSION EXPIRES OCTOBER 19, 1989.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Low Fusco

My name is Low Fusco. I am employed by TERA Corporation
as Assoc. TECH REVIEWER

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Low Fusco

Sworn and Subscribed Before Me This 17 Day of March 1983

Marjorie Hand
Notary Public

My Commission Expires March 19, 1985



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF JAMES I OWENS

My name is JAMES I OWENS. I am employed by TERA Corporation as ASSOCIATE TECHNICAL REVIEWER

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

James I Owens

Sworn and Subscribed Before Me This 17th Day of March 1983

Margaret R. Cameron
Notary Public

My Commission Expires My Commission expires December 23, 1984

* WITH THE EXCEPTION of the
MIDLAND INDEPENDENT DESIGN AND
CONSTRUCTION VERIFICATION PROGRAM.

3/17/83

A LIST OF MUTUAL FUNDS
IN WHICH I HAVE AN
INTEREST BUT OVER WHICH
I HAVE NO CONTROL IS

- 1) 44 WALL STREET FUND INC
- 2) MUTUAL SHARES CORP

James (Over)

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Edward M. Beck

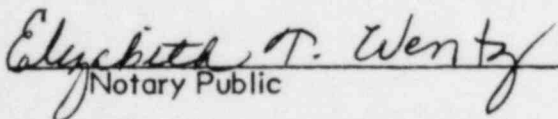
My name is Edward M. Beck. I am employed by TERA Corporation as Associate Technical Reviewer.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project,* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed



Sworn and Subscribed Before Me This 17 Day of March 1983


Notary Public

My Commission Expires 11-1-1985

*with the exception of the Midland Independent Design and Construction Verification Program


STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Robert Reneau


My name is Robert Reneau. I am employed by TERA Corporation
as Associate Technical Reviewer.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed



Sworn and Subscribed Before Me This 17 Day of March 1983



Notary Public

My Commission Expires 11-1-1985

*with the exception of the Midland Independent Design and Construction Verification Program

Daily Cash Accumulation Fund Inc.
3600 S. Yosemite Street
Denver, Colorado 80237

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Joseph Penzien

My name is Joseph Penzien. I am employed by TERA Corporation
as Associate Technical Reviewer

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

* with the exception of the
Midland Independent Design
and Construction Verification
Program.

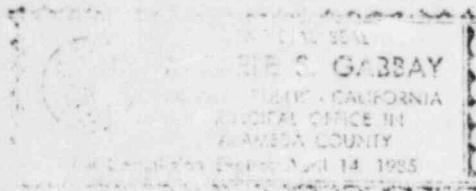
Signed

Joseph Penzien

Sworn and Subscribed Before Me This 17 Day of March 1983

Michelle S. Gabbay
Notary Public

My Commission Expires April 14, 1985



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Daniele Veneziano

My name is Daniele Veneziano. I am employed by TERA Corporation as Associate Technical Reviewer

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Daniele Veneziano

Sworn and Subscribed Before Me This 17 Day of March 1983

Gloria M. McClellan
Notary Public

My Commission Expires August 10, 1984

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF S. N. BRISCOMBE

My name is Stephen N. Brisco. I am employed by TERA Corporation as Associate Technical Reviewer.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company,*Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company,*Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

S. N. Brisco

Sworn and Subscribed Before Me This 17th Day of March 1983

Marjorie Hand
Notary Public

My Commission Expires March 19, 1985



* Employed by Bechtel Power Corporation, Construction Staff, 1977-79. Performed Review Activity on site for three days in 1979. Work consisted of reviewing electrical design, notes and details, for constructability.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF RICHARD W. KELLER

My name is RICHARD W. KELLER. I am employed by TERA Corporation
as ASSISTANT TECHNICAL REVIEWER.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project,* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Richard W. Keller

* with the exception
of the Midland independent
design and construction
verification program,

Sworn and Subscribed Before Me This 17th Day of March 1983

Charles S. Luginbuhl
Notary Public

My Commission Expires at death

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF LOREN STANLEY

My name is Loren Stanley. I am employed by TERA Corporation as ASSOC. TECH. REVIEWER.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Loren Stanley

Sworn and Subscribed Before Me This 17th Day of March 1983

Marjorie Hand
Notary Public

My Commission Expires March 19, 1985



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF EDWARD D. SCHRULL

My name is EDWARD D. SCHRULL. I am employed by TERA Corporation as ASSOCIATE TECHNICAL REVIEWER.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

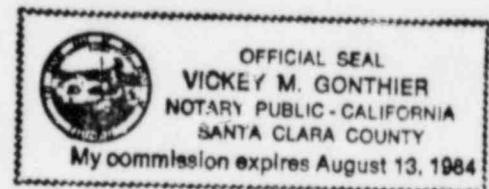
Signed

Edward D. Schrull

Sworn and Subscribed Before Me This 17th Day of March 1983

Vickey M. Gonthier
Notary Public

My Commission Expires 8-13-84



*With the exception of the Midland Independent Design Construction Verification Program.


STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Luis E. Flores

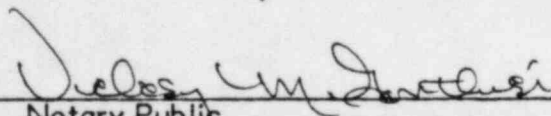
My name is Luis E. Flores. I am employed by TERA Corporation as Associate Technical Reviewer.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

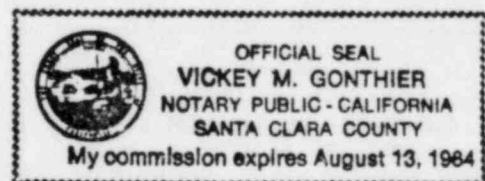
Signed



Sworn and Subscribed Before Me This 17th Day of March 1983


Notary Public

My Commission Expires 8-13-84



*With the exception of the Midland Independent Design Construction Verification Program.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF DAVID B. HAMEL

My name is DAVID B. HAMEL. I am employed by TERA Corporation as ASSOCIATE TECHNICAL REVIEWER.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

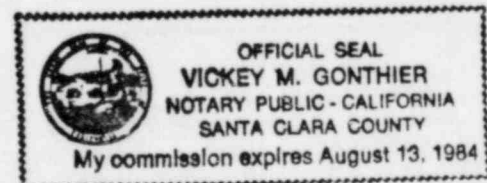
Signed

David B. Hamel

Sworn and Subscribed Before Me This 17th Day of March 1983

Vickey M. Gonthier
Notary Public

My Commission Expires 8-13-84



*With the exception of the Midland Independent Design Construction Verification Program.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF HARRY L. BROXSON

My name is HARRY L. BROXSON. I am employed by TERA Corporation as ASSOCIATE TECHNICAL REVIEWER

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

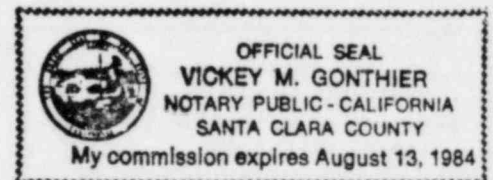
Signed

Harry L. Broxson

Sworn and Subscribed Before Me This 17th Day of March 1983

Vickey M. Gonthier
Notary Public

My Commission Expires 8-13-84



*With the exception of the Midland Independent Design Construction Verification Program.

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Lawrence Wight

My name is Lawrence Wight. I am employed by TERA Corporation.

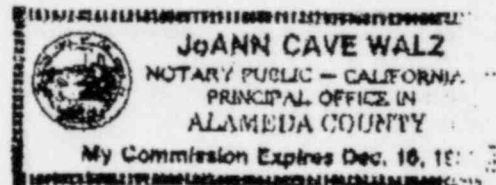
I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project*, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

* with the exception of the Midland Independent Design and Construction Verification Program.

Sworn and Subscribed Before Me This 18 Day of March 1983

J. G. Cave Walz
Notary Public
My Commission Expires 12/16/83



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF JAMES A. LONG, III

My name is James A. Long, III. I am employed by TERA Corporation.

I am under consideration for assignment to the team which will conduct an independent overview of the Construction Completion Program at the Midland Nuclear Plant site. Prior to being given this assignment, I have never worked on any job or task associated with the Midland Project* or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

James A. Long, III

Sworn and Subscribed Before Me This 18th Day of March 1983

Arde Lee Roff
Notary Public

My Commission Expires My Commission Expires July 1, 1986

* with the exception of the Midland Independent Design and Construction Verification Program

EXPLANATORY NOTE FOR ATTACHMENT 2:

Several individual affidavits are not presently included as part of attachment 2 due to logistics. These affidavits will be submitted under separate cover.

KEY PERSONNEL

CONSTRUCTION COMPLETION PROGRAM OVERVIEW

- PROJECT DIRECTION

JOHN BECK, M.S., PRINCIPAL-IN-CHARGE

NUCLEAR POWER PLANT OPERATIONS AND CORPORATE MANAGEMENT, LICENSING, ENGINEERING AND PROJECT MANAGEMENT

- VICE PRESIDENT, TERA CORPORATION
- 18 YEARS NUCLEAR EXPERIENCE
- FORMERLY EXECUTIVE VICE PRESIDENT, VERMONT YANKEE NUCLEAR POWER CORPORATION; SERVED AS CHIEF OPERATING OFFICER
- FORMERLY DIRECTOR OF ENGINEERING, YANKEE ATOMIC ELECTRIC COMPANY

HOWARD LEVIN, M.S., PROJECT MANAGER

NUCLEAR POWER PLANT STRUCTURAL, MECHANICAL DESIGN AND CONSTRUCTION, EQUIPMENT QUALIFICATION, OPERATING REACTOR SAFETY, LICENSING, PROJECT MANAGEMENT

- 9 YEARS NUCLEAR EXPERIENCE/11 YEARS ENGINEERING EXPERIENCE
- FORMERLY WITH NRC AND STONE & WEBSTER

KEY PERSONNEL

(continued)

- SENIOR REVIEW TEAM

WILLIAM J. HALL, PH.D., UNIVERSITY OF ILLINOIS

ENGINEERING ANALYSIS AND DESIGN, STRUCTURAL ENGINEERING, STRUCTURAL MECHANICS AND DYNAMICS, SOIL MECHANICS, FRACTURE MECHANICS, ENGINEERING CRITERIA DEVELOPMENT FOR MAJOR PROJECTS

- 39 YEARS EXPERIENCE IN NUCLEAR, MILITARY, AND COMMERCIAL FIELDS
- CONSULTANT TO NRC, NATIONAL LABS, TERA CORPORATION, AND OTHERS ON NUCLEAR SAFETY ISSUES
- LONG ASSOCIATE OF LATE NATHAN M. NEWMARK

DONALD DAVIS, TERA

NUCLEAR SAFETY AND LICENSING, PLANT AND REACTOR SYSTEMS, THERMAL-HYDRAULIC ANALYSIS, ACCIDENT ANALYSIS

- 15 YEARS NUCLEAR EXPERIENCE/18 YEARS ENGINEERING EXPERIENCE
- FORMERLY WITH NRC AND HITTMAN ASSOCIATES

ROBERT WILSON, M.S.

NUCLEAR POWER PLANT OPERATIONS, ENGINEERING AND DESIGN, LICENSING, CONTRACT ADMINISTRATION, PROJECT MANAGEMENT, PUBLIC RELATIONS

- SENIOR VICE PRESIDENT, TERA CORPORATION
- 16 YEARS NUCLEAR EXPERIENCE
- FORMERLY SUPERVISOR OF NUCLEAR ENGINEERING, SMUD

KEYPERSONNEL

(continued)

• LEAD TECHNICAL REVIEWERS

CURT STALEY, M.S., LEAD STRUCTURAL REVIEWER AND
CONSTRUCTION VERIFICATION PROGRAM MANAGER

NUCLEAR POWER PLANT STRUCTURAL, MECHANICAL DESIGN,
CONSTRUCTION PROJECT MANAGEMENT AND CONTROL

- 14 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH BECHTEL, GENERAL DYNAMICS, CHEMICO

FRANK DOUGHERTY, M.S., M.B.A., LEAD MECHANICAL REVIEWER

NUCLEAR POWER PLANT MECHANICAL DESIGN, QUALITY ASSUR-
ANCE, SAFETY AND RELIABILITY ANALYSIS, SYSTEM
DESIGN/CRITERIA DEVELOPMENT

- 14 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH EDS AND SARGENT & LUNDY

RICHARD SNAIDER, M.B.A., LEAD SYSTEMS REVIEWER

NUCLEAR POWER PLANT OPERATIONS, MAINTENANCE AND
DESIGN, SYSTEMS ENGINEERING, LICENSING PROJECT MANAGE-
MENT, MECHANICAL ENGINEERING

- 15 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH JERSEY CENTRAL POWER & LIGHT AND NRC

LIONEL BATES, M.S., LEAD ELECTRICAL REVIEWER

NUCLEAR POWER PLANT ELECTRICAL, INSTRUMENTATION AND
CONTROL SYSTEMS DESIGN, EQUIPMENT QUALIFICATION, PLANT
OPERATIONS AND MAINTENANCE

- 10 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH NUTECH, WESTINGHOUSE, SAN DIEGO GAS AND
ELECTRIC COMPANY, AND OMTEC

KEY PERSONNEL

(continued)

- LEAD SITE ACTIVITIES

MARTIN JONES

NUCLEAR POWER PLANT CONSTRUCTION MANAGEMENT, QUALITY CONTROL, TRAINING, START-UP, ELECTRICAL ENGINEERING

- 22 YEARS NUCLEAR EXPERIENCE
- FORMERLY MANAGER OF CONSTRUCTION AND QUALITY CONTROL, SOUTH CAROLINA ELECTRIC AND GAS COMPANY

- PROJECT QUALITY ASSURANCE

CHARLES LEMON

NUCLEAR POWER PLANT ENGINEERING, QUALITY ASSURANCE, LICENSING, COMPUTER SYSTEMS APPLICATION

- 12 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH BECHTEL

MARK POLIT

NUCLEAR POWER PLANT LICENSING, EQUIPMENT QUALIFICATION, INSTRUMENTATION AND CONTROL, SYSTEMS ENGINEERING

- 3 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH OMTEC AND NUTECH

- DESIGN REVIEW TEAM PERSONNEL

ROBERT CUDLIN, M.S., J.D.

NUCLEAR SAFETY AND LICENSING, REACTOR SAFEGUARDS, PLANT AND CONTAINMENT SYSTEMS, EQUIPMENT QUALIFICATION

- 9 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH NRC, SENATE SUBCOMMITTEE ON NUCLEAR REGULATION

KEY PERSONNEL

(continued)

● DESIGN REVIEW TEAM PERSONNEL

HENRY GEORGE, M.S.

QUALITY ASSURANCE, TRAINING, NUCLEAR PLANT SYSTEMS, PROCEDURES, PROJECT MANAGEMENT, MECHANICAL ENGINEERING

- 8 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH NRC AND ARMY

CHRISTIAN MORTGAT, PH.D.

ENGINEERING MECHANICS, EARTHQUAKE ENGINEERING

- 5 YEARS NUCLEAR EXPERIENCE/9 YEARS ENGINEERING EXPERIENCE
- FORMERLY WITH WOODWARD-CLYDE

LOREN STANLEY

NUCLEAR POWER PLANT LICENSING, DESIGN REVIEW, SAFETY-RELATED COMPONENT DETERMINATIONS, PROBABILISTIC RISK ASSESSMENT, INSTRUMENTATION, SYSTEM DESIGN AND ANALYSIS

- 26 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH GENERAL ELECTRIC COMPANY, OMTEC AND QUADREX CORPORATION

RICHARD KELLER, M.S.

ELECTRICAL, INSTRUMENTATION, AND CONTROL SYSTEMS DESIGN, NUCLEAR POWER PLANT OPERATIONAL ANALYSIS, PLANT PROTECTION SYSTEMS/ENGINEERED SAFETY FEATURES EVALUATION, PROBABILISTIC RISK ASSESSMENT

- 15 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH AEROJET NUCLEAR, STOLLER AND SYSTEM DEVELOPMENT CORPORATION

KEY PERSONNEL

(continued)

- DESIGN REVIEW TEAM PERSONNEL

MEHMET CELEBI, PH.D.

NUCLEAR POWER PLANT STRUCTURAL, MECHANICAL DESIGN AND
CONSTRUCTION, QUALITY ASSURANCE

- 16 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH BECHTEL, EDAC

JORMA ARROS, PH.D. (CANDIDATE)

ENGINEERING MECHANICS

- 5 YEARS NUCLEAR EXPERIENCE/8 YEARS ENGINEERING EXPERIENCE

KENNETH CAMPBELL, PH.D.

SOIL MECHANICS, EARTHQUAKE ENGINEERING

- 10 YEARS ENGINEERING EXPERIENCE

EDWARD SCHRULL

REACTOR SAFETY SYSTEMS, NUCLEAR LICENSING, RELIABILITY
AND RISK ASSESSMENT, INSTRUMENTATION AND CONTROL,
COMPUTER ANALYSES

- 9 YEARS NUCLEAR EXPERIENCE
- CURRENTLY WITH EIGEN ENGINEERING
- FORMERLY WITH OMTEC, QUADREX AND NUTECH

STAN FABIC, PH.D.

THERMAL-HYDRAULIC AND HYDRO-ELASTIC ANALYSIS, COMPU-
TER METHODS DEVELOPMENT (AUTHORED BLODWN-2, WHAM,
GASRAD, MULTIFLEX), PIPE RUPTURE ANALYSIS, CONTAINMENT
ANALYSIS

- 24 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH NRC, WESTINGHOUSE, AND KAISER ENGINEERS

KEY PERSONNEL

(continued)

- DESIGN REVIEW TEAM PERSONNEL

NORMAND BERUBE, M.S.

DESIGN AND ANALYSIS OF MECHANICAL SYSTEMS, THERMAL-HYDRAULICS, HEAT TRANSFER, ENGINEERING, ANALYSIS

- 11 YEARS ENGINEERING EXPERIENCE

JOSEPH MARTORE, M.S., M.B.A.

NUCLEAR POWER PLANT STRUCTURAL, MECHANICAL DESIGN AND CONSTRUCTION, EQUIPMENT QUALIFICATION, OPERATING REACTOR SAFETY, LICENSING, PROJECT MANAGEMENT

- 8 YEARS NUCLEAR EXPERIENCE/10 YEARS ENGINEERING EXPERIENCE
- FORMERLY WITH NRC AND STONE & WEBSTER

JOHN ANGELO, M.S.

DESIGN, OPERATION, MAINTENANCE, INSTALLATION, TESTING AND INSPECTION OF POWER PLANT SYSTEMS AND COMPONENTS, NUCLEAR SAFETY AND LICENSING

- 20 YEARS NUCLEAR EXPERIENCE/33 YEARS ENGINEERING EXPERIENCE
- FORMERLY WITH GENERAL ELECTRIC, ARMY REACTORS, NRC

FARZIN RAMEZANBEIGI

STRUCTURAL AND MECHANICAL ENGINEERING, USAGE AND INTERPRETATION OF STRUCTURAL/MECHANICAL COMPUTER CODES

SUSAN SLY

CIVIL/MECHANICAL DESIGN AND CONSTRUCTION, INSTALLATION AND INSPECTION

- 4 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH BECHTEL

KEY PERSONNEL

(continued)

● DESIGN REVIEW TEAM PERSONNEL

JAMES LONG

ENGINEERING MANAGEMENT, NUCLEAR SAFETY AND LICENSING

- 16 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH NRC, NAVY

RICHARD MACDONALD, M.B.A.

ENGINEERING, CONSTRUCTION, OPERATION, MAINTENANCE AND PROJECT MANAGEMENT SYSTEMS, NUCLEAR PLANT START-UP AND OPERATIONS

- 11 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH BECHTEL

CHRISTIAN NELSON

NUCLEAR POWER PLANT SAFETY AND LICENSING, SEISMIC DESIGN, OPERATIONAL ANALYSIS, PLANT INSPECTION PROGRAM DEVELOPMENT

- 12 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH NRC

JOSEPH PENZIEN, PH.D., UNIVERSITY OF CALIFORNIA (BERKELEY)

STRUCTURAL ENGINEERING, EARTHQUAKE ENGINEERING, REINFORCED CONCRETE RESPONSE

- 37 YEARS ENGINEERING EXPERIENCE
- CURRENTLY DIRECTOR OF EARTHQUAKE ENGINEERING RESEARCH CENTER AT UNIVERSITY OF CALIFORNIA, BERKELEY

KEY PERSONNEL

(continued)

- DESIGN REVIEW TEAM PERSONNEL

DANIELE VENEZIANO, PH.D., MASSACHUSETTS INSTITUTE OF TECHNOLOGY

ENGINEERING STATISTICAL ANALYSIS, PROBABILISTIC ANALYSIS,
CIVIL ENGINEERING

- PROFESSOR OF CIVIL ENGINEERING

MICHAEL AYCOCK

NUCLEAR POWER PLANT SYSTEMS, OPERATING PROCEDURES,
LICENSING AND PROJECT MANAGEMENT

- 8 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH NRC

GEORGE TRIGILIO

NUCLEAR RADWASTE SYSTEM DESIGN AND ANALYSIS, PROJECT
MANAGEMENT

- FORMERLY WITH BROWN & ROOT, STONE & WEBSTER AND
HITTMAN NUCLEAR DEVELOPMENT CORPORATION

LENNY LAAKSO, M.S.

STRUCTURAL/MECHANICAL ANALYSIS AND DESIGN OF NUCLEAR
POWER PLANT BUILDINGS AND EQUIPMENT, SPECIFICATIONS,
PLANNING AND SCHEDULING

- 8 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH STONE AND WEBSTER, CHAS. T. MAIN

KEY PERSONNEL

(continued)

- DESIGN REVIEW TEAM PERSONNEL

LOUIS FUSCO, JR.

NUCLEAR SYSTEMS ENGINEERING AND LICENSING, EQUIPMENT QUALIFICATION, ENGINEERING AND PROJECT MANAGEMENT, NUCLEAR POWER PLANT OPERATIONS AND MANAGEMENT

- 8 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH NUS, EDS, NAVY

STEPHEN SCHREURS

DESIGN AND ANALYSIS OF RADWASTE PROCESSING SYSTEMS, COMPUTER SYSTEMS APPLICATION, PROJECT MANAGEMENT

- 9 YEARS NUCLEAR EXPERIENCE

DOUGLAS M. WITT, M.S.

NUCLEAR POWER PLANT SYSTEMS AND MECHANICAL DESIGN, SAFETY ANALYSIS, EQUIPMENT DESIGN, LICENSING, HELBA, THERMAL-HYDRAULICS

- 12 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH SARGENT AND LUNDY, EDS NUCLEAR

- CONSTRUCTION REVIEW TEAM PERSONNEL

JAMES OWENS

NUCLEAR AND FOSSIL POWER PLANT DESIGN AND CONSTRUCTION, NUCLEAR STEAM SUPPLY SYSTEMS DESIGN AND CONSTRUCTION, PROJECT MANAGEMENT, CONTROL SYSTEMS, SAFEGUARDS, LICENSING

- 32 YEARS NUCLEAR EXPERIENCE
- FORMERLY GENERAL MANAGER - PRODUCTION ENGINEERING AND CONSTRUCTION AND PROJECT MANAGER SUMMIT NUCLEAR POWER STATION, DELMARVA POWER AND LIGHT COMPANY

KEY PERSONNEL

(continued)

- CONSTRUCTION REVIEW TEAM PERSONNEL

LUIS FLORES

NUCLEAR POWER PLANT LICENSING, OPERATIONS, SYSTEMS ENGINEERING, INSTRUMENTATION AND CONTROL SYSTEMS, FAILURE ANALYSIS

- 9 YEARS NUCLEAR EXPERIENCE
- CURRENT WITH EIGEN ENGINEERING
- FORMERLY WITH OMTEC AND GENERAL ELECTRIC COMPANY

MONTE WISE

ENGINEERING AND PROJECT MANAGEMENT, PRESERVICE/INSERTION INSPECTION, NDE, NUCLEAR POWER PLANT OPERATIONS AND MANAGEMENT, QUALITY ASSURANCE, EQUIPMENT QUALIFICATION

- 25 YEARS NUCLEAR EXPERIENCE
- FORMERLY SUPERINTENDENT OF LACROSSE BWR
- FORMERLY WITH SW RESEARCH AND GENERAL ELECTRIC

PATRICK LONGSTRETH, B.S., M.B.A.

PROJECT AND CONSTRUCTION MANAGEMENT, ADMINISTRATION, CONTROL AND PLANNING, CONTRACTING

- 15 YEARS PROJECT AND CONSTRUCTION MANAGEMENT EXPERIENCE
- FORMERLY WITH BECHTEL

KEY PERSONNEL

(continued)

● CONSTRUCTION REVIEW TEAM PERSONNEL

STEPHEN BRISCOMBE

CONSTRUCTION MANAGEMENT, SITE CONSTRUCTION SERVICES, CONSTRUCTION SUPERVISION, ELECTRICAL CONSTRUCTION TECHNIQUES, PROCEDURES AND SPECIFICATION DEVELOPMENT, DESIGN REVIEW, QUALITY CONTROL

- 17 YEARS NUCLEAR EXPERIENCE/25 YEARS ENGINEERING EXPERIENCE
- FORMERLY WITH GE AND BECHTEL

SIDNEY BROWN

ENGINEERING AND CONSTRUCTION MANAGEMENT, COST AND SCHEDULING, QUALITY CONTROL, FIELD ENGINEERING

- 17 YEARS NUCLEAR EXPERIENCE/30 YEARS ENGINEERING EXPERIENCE
- FORMERLY WITH BECHTEL

LEONARD STOUT

DESIGN, CONSTRUCTION, START-UP AND OPERATIONS, PROJECT CONTROL, SCHEDULE AND COST CONTROL SYSTEMS

- 14 YEARS EXPERIENCE
- FORMERLY WITH BECHTEL

DAVID HAMEL

NUCLEAR POWER PLANT LICENSING, EQUIPMENT ENVIRONMENTAL QUALIFICATION, REACTOR DESIGN, SAFETY EVALUATION, INSTRUMENTATION AND CONTROL DESIGN, FACILITIES OPERATION, HEALTH PHYSICS, QUALITY ASSURANCE

- 16 YEARS NUCLEAR EXPERIENCE
- CURRENTLY WITH EIGEN ENGINEERING
- FORMERLY WITH NUTECH AND GENERAL ELECTRIC COMPANY

KEY PERSONNEL

(continued)

- CONSTRUCTION REVIEW TEAM PERSONNEL

FREDERICK BERTHRONG, M.S.

ENGINEERING PROJECT MANAGEMENT, PLANNING, SCHEDULING
AND FIELD ENGINEERING

- 18 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH BECHTEL

DONALD TULODIESKI

PROJECT MANAGEMENT/CONTROL, START-UP TESTING, ENGINEER-
ING

- 17 YEARS NUCLEAR EXPERIENCE
- FORMERLY WITH B&W AND PUBLIC SERVICE ELECTRIC AND
GAS COMPANY

ALBERT MARTORE

ENGINEERING, SPECIFICATION, CONSTRUCTION FABRICATION,
CONSTRUCTION MANAGEMENT AND CONTROL, SCHEDULING,
SUPERVISION, INSPECTION

- 10 YEARS NUCLEAR EXPERIENCE/30 YEARS ENGINEERING
EXPERIENCE
- FORMERLY WITH PRESCON CORPORATION

ROBERT SNYDER

NUCLEAR POWER PLANT DESIGN AND CONSTRUCTION, PROJECT
MANAGEMENT, START-UP AND OPERATIONS

- 5 YEARS NUCLEAR EXPERIENCE/OVER 30 YEARS ENGINEERING
EXPERIENCE
- FORMERLY WITH HITTMAN ASSOCIATES AND KAISER

GARY SMITH

CIVIL ENGINEERING DESIGN AND CONSTRUCTION, PROJECT
MANAGEMENT

- 15 YEARS EXPERIENCE

KEY PERSONNEL

(continued)

● CONSTRUCTION REVIEW TEAM PERSONNEL

STANLEY KAUT

DESIGN, REVIEW, CONSTRUCTION, TESTING, OPERATION, AND LICENSING OF ELECTRICAL POWER, INSTRUMENTATION AND CONTROL SYSTEMS AND EQUIPMENT; PROJECT MANAGEMENT, DESIGN REVIEW, PLANT PROCEDURES, QUALITY ASSURANCE

- 17 YEARS NUCLEAR EXPERIENCE/20 YEARS ENGINEERING EXPERIENCE
- FORMERLY WITH NUTECH, NUCLEAR SERVICES CORPORATION, AND GE

RANDY CLELAND, M.B.A.

POWER PLANT MECHANICAL DESIGN, PIPING/HANGER DESIGN AND CONSTRUCTION, REVIEW AND INSPECTION OF MECHANICAL SYSTEMS, CONSTRUCTION SUPERVISION AND MANAGEMENT, RESULTS ENGINEERINGS

- 10 YEARS POWER PLANT ENGINEERING EXPERIENCE, 2 YEARS NUCLEAR
- FORMERLY WITH CENTRAL ILLINOIS PUBLIC SERVICE COMPANY AND SARGENT AND LUNDY

EDWARD BECK

NONDESTRUCTIVE TESTING, LEVEL III IN RADIOGRAPHY, ULTRASONICS, MAGNETIC PARTICLE, LIQUID PENETRANT

- 14 YEARS NUCLEAR EXPERIENCE
- CURRENTLY WITH LAW ENGINEERING

ROBERT RENEAU

NONDESTRUCTIVE TESTING, LEVEL II IN RADIOGRAPHY, ULTRASONICS, MAGNETIC PARTICLE, LIQUID PENETRANT

- 10 YEARS NUCLEAR EXPERIENCE
- PREVIOUSLY WITH WESTINGHOUSE, CURRENTLY WITH LAW ENGINEERING

KEY PERSONNEL

(continued)

ORIN W. KILGORE

CERTIFIED LEAD AUDITOR, ANSI N45.2.23, PROJECT AND CORPORATE QUALITY ASSURANCE, CONSTRUCTION, STARTUP AND OPERATIONS. AEC LICENCED SENIOR REACTOR OPERATOR.

- 26 YEARS NUCLEAR POWER EXPERIENCE
- FORMERLY WITH TVA AND NAVY

WILLIAM D. PRYOR

CERTIFIED QUALITY ENGINEER, ASQC, ANSI N45.2.6 LEVEL III QUALITY INSPECTOR CERTIFICATIONS IN MECHANICAL, PIPING, ELECTRICAL AND INSTRUMENTATION, STARTUP, TEST AND OPERATIONS

- 23 YEARS NUCLEAR POWER EXPERIENCE

FREDERICK A. PELLEVIN

PROFESSIONAL QUALITY ENGINEER - STATE OF CALIFORNIA. DEVELOPMENT, IMPLEMENTATION, MONITORING, SUPERVISION, AND EVALUATION OF QUALITY ASSURANCE AND QUALITY CONTROL PROGRAMS

- 25 YEARS NUCLEAR EXPERIENCE
- FORMERLY INVOLVED IN VARIOUS QA FUNCTIONS FROM QUALITY ENGINEER TO MANAGER OF QA ON SUCH PROJECTS AS WATERFORD 3, VOGTLE AND NINE MILE POINT UNIT 2
- WORKED FOR MAJOR NUCLEAR CONTRACTORS SUCH AS GENERAL DYNAMICS, GILBERT ASSOCIATES, STONE & WEBSTER, MERCURY COMPANY AND ZURN INDUSTRIES