

AFFIDAVIT OF

A. H. BOREN

THE STATE OF TEXAS :  
COUNTY OF DALLAS :

BEFORE ME, the undersigned authority, a Notary Public in and for Dallas County, Texas, on this day personally appeared A. H. BOREN, who by me being duly sworn upon his oath deposes and says:

My name is A. H. Boren. I am presently employed by Texas Utilities Generating Company at Dallas, Texas. My residence address is 319 Harrington Drive, Duncanville, Texas 75116.

In 1978, I was Supervisor of the Dallas-Vendor Compliance Group for TUGCO. I do not recall having been interviewed by Management Analysis Company ("MAC") in connection with a review being performed by them of the Quality Assurance Program at Comanche Peak but I may have been.

I do not recall when I first learned that MAC had issued a report. It may have come to me from a newspaper article. I do not recall ever having received or read a copy of the report. I was Maintenance Services QA Manager for lignite and gas power plants for TUGCO on December 31, 1984 and currently hold this same position with TUGCO.

While I was aware of requests for records having been made by the Intervenor in the Comanche Peak licensing proceedings, I was not involved in the requests for information or the search for documents, was not aware of the existence of the MAC report in 1980, and did not participate in any discussions regarding whether the MAC report should be produced in response to the CASE discovery requests.

SUBSCRIBED AND SWORN TO before me by the said A. H. BOREN on this,  
the 8<sup>th</sup> day of August, 1985.

Jeri Smart  
Notary Public in and for Dallas  
County, Texas

My Commission Expires:  
November 13, 1988.