

AFFIDAVIT OF
PERRY G. BRITTAIN

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 PERRY G. BRITTAIN, who by me being duly sworn upon his oath deposes and says:

My name is Perry G. Brittain. I am presently the Chairman and Chief Executive Officer of Texas Utilities Company at 2001 Bryan, Dallas, Texas 75201. I reside at 6806 Hyde Park Drive, Dallas, Texas 75231. My telephone number is 214/653-4628. In 1978, I was the President of Texas Utilities Generating Company and also held positions with Texas Utilities Company and other subsidiaries of Texas Utilities Company. On December 31, 1984, I was Chairman and Chief Executive Officer of Texas Utilities Company and was also the Chairman and Chief Executive Officer of several subsidiaries of Texas Utilities Company but was not at that time an officer of Texas Utilities Generating Company.

In 1978, I authorized a study to be conducted by Management Analysis Company ("MAC"). I attended meetings with one or more representatives of MAC, both before and after they performed their review. In addition, I met with R. J. Gary and L. F. Fikar after MAC performed its review to discuss with them the recommendations and findings made by MAC.

I asked MAC to do an organizational review. I did not consider this to be an audit in the usual sense of that word. I simply wanted to obtain an outside perspective on the TUGCO management organization for the Comanche Peak Steam Electric Station Project. It was never intended that we would rely upon MAC's review to meet any NRC regulatory requirements. I received a copy of the

report prepared by MAC as a result of their review and I discussed this report with representatives of MAC and with Messrs. Gary and Fikar. After we reviewed the recommendations contained in the report, I had my copy of the report placed in the files maintained by the President of TUGCO where, I assume, it remained until sometime in late April or early May, 1985 when it was found by personnel who were searching for information for a prudence audit being performed for Texas Utilities Electric Company.

I believe that it was generally understood by both R. J. Gary and L. F. Fikar that the work being performed by MAC was solely for our use and benefit, to enable the senior management of TUGCO to properly perform its managerial responsibility. The results of the MAC review were thus not publicized and it is my understanding that the MAC report did not receive wide distribution among TUGCO employees at the site.

I have not been an active participant in the gathering of data or information in response to requests for information made by the Intervenor or others in the Comanche Peak licensing proceedings. In 1980, I was not aware that CASE, the Intervenor in the proceedings, had requested information from TUGCO as to evaluations, studies, and audits which had been conducted at Comanche Peak. I did not become aware of this request for information until Mr. Wooldridge contacted me in late May, 1985, to discuss this matter with me. Prior to that time, I had not participated in any discussions with anyone regarding whether the report prepared by MAC should or should not be produced in response to any request for information in the licensing proceedings.


PERRY G. BRITTAIN

SUBSCRIBED AND SWORN TO before me by the said PERRY G. BRITTAIN
on this, the 7th day of August, 1985.

Bollie H. Monaghan
Notary Public in and for Dallas
County, Texas

My Commission Expires:

May 9, 1989