

AFFIDAVIT OF  
DAVID N. CHAPMAN

THE STATE OF TEXAS     :  
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COUNTY OF DALLAS     :

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

My name is David N. Chapman. I am presently employed by Texas Utilities Fuel Company and office at 2001 Bryan Tower, Dallas, Texas 75201. I reside at 627 Parkview, Richardson, Texas 75080. My office telephone number is 214/653-4642 and my home telephone number is 214/238-7394.

I first became aware of a report prepared by Management Analysis Company ("MAC") sometime in mid-1978. At that time, I was Manager, Quality Assurance, for Texas Utilities Generating Company. I also had that position in 1980 and on December 31, 1984. On March 1, 1985, I transferred from Nuclear QA Manager to Executive Assistant to the Vice President for TUGCO Gas Plant Operations in Dallas. On June 1, 1985, I was transferred to Texas Utilities Fuel Company as Executive Assistant to the Executive Vice President.

I recall being interviewed by a representative of MAC in connection with their review of the organization of TUGCO at Comanche Peak in 1978. I do not recall attending any formal meetings with representatives of MAC prior to the review but I did meet with John Jackson sometime prior to the review. I believe that I also attended a meeting with representatives of MAC after this review, but I am not sure of this. I was aware in 1978 that MAC had issued a written report, and I received a copy and read it shortly after it was sent to TUGCO in 1978. While I initially had a copy of the report, I no longer have one, and I do not recall what

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happened to my copy or whether I even kept my copy after the review of the MAC report was completed. I aided in drafting a response to the recommendations and findings made in the MAC report. That response is the same as the one bearing the signatures of R. J. Gary and L. F. Fikar addressed to P. G. Brittain and attached as a copy to Mr. R. A. Wooldridge's letter to the Licensing Board of May 29, 1985.

In 1980, I was aware that CASE, the Intervenor in the Comanche Peak licensing proceedings, had requested a substantial amount of information from TUGCO in connection with TUGCO's Quality Assurance Program. I also recall discussions of the MAC report in the context of the discovery requests having taken place with Susan Spencer Palmer and Ron Tolson. I recall discussing this matter with Mr. B. R. Clements, to whom I reported. It is my recollection that Mr. Clements assumed the responsibility for TUGCO Quality Assurance, as an officer of TUGCO, sometime shortly after CASE's request for information was received by TUGCO. Mr. Clements informed me that the decision had already been made by one or more other members of TUGCO management that the MAC report was not subject to the discovery request. It is possible that I also discussed this matter with John Marshall but I do not recall the specifics of any such conversation.

While I do not recall any specific conversations with anyone after the discovery and production of documents in 1980, it is possible that the MAC report and its confidentiality was discussed again with B. R. Clements or Ron Tolson or Susan Spencer Palmer. I do not recall any conversations regarding the discoverability of the MAC report with L. F. Fikar, R. J. Gary, or P. G. Brittain.

In late April or early May, 1985, I had a conversation with Andy Jones who asked me about the MAC report in connection with his effort to gather documents for the prudence audit being conducted for Texas Utilities Electric Company. I told him that before the report should be delivered to the prudence auditor, the matter should be discussed with Mr. Clements. The next information I had concerning the MAC report was in a conversation which I had with Mr. R. A.

Wooldridge, legal counsel to the Texas Utilities Companies, sometime in mid-May, 1985.

David N. Chapman  
DAVID N. CHAPMAN

SUBSCRIBED AND SWORN TO before me by the said DAVID N. CHAPMAN,  
on this, the 8TH day of AUGUST, 1985.

Kay Whittemore  
Notary Public in and for Dallas  
County, Texas

My Commission Expires:

7-1-89