

AFFIDAVIT OF
B. R. CLEMENTS

THE STATE OF TEXAS :
 :
COUNTY OF TARRANT :

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

My name is B. R. Clements. I am presently employed by Texas Electric Service Company as a Vice President. My business address is P. O. Box 970, Fort Worth, Texas. My office number is 817/429-9589. At the time I first learned of a report having been prepared by Management Analysis Company ("MAC") in connection with a review of TUGCO management at the Comanche Peak Steam Electric Station, I was a Vice President of Texas Utilities Generating Company. I had the same title on December 31, 1984. I transferred to Texas Electric Service Company on June 11, 1985.

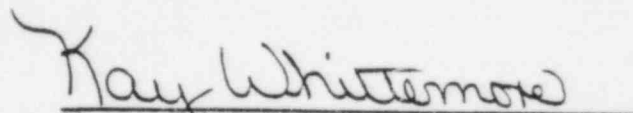
I did not participate in the MAC management review at the Comanche Peak plant in 1978. I was not interviewed by MAC representatives at that time and attended no pre- or post-audit meetings with representatives of MAC. I never had in my possession a copy of the MAC report until I received a copy with Mr. R. A. Wooldridge's letter to the Licensing Board of May 29, 1985. I had not read all or any portion of the report prior to that time. I did not participate in any management discussions regarding the MAC report or its findings or recommendations at any time in 1978.

In 1980, when I assumed the responsibility for the Quality Assurance Program at Comanche Peak, which I believe was sometime in August of 1980, I became generally aware that CASE, the Intervenor in the Comanche Peak licensing

proceedings, had requested information from TUGCO concerning the Quality Assurance Program. While I was generally aware of the review performed by MAC in 1978, I did not have and had never seen a copy of the MAC report at that time. I recall that the subject of the possible discoverability of the MAC report was discussed after I became responsible for the QA Program. It was my understanding that the decision had already been made by TUGCO management that the MAC report was not within the scope of CASE's request for information. I was not told who, specifically, made the decision. I do not recall who told me of this previous decision but believe it was Mr. Dave N. Chapman. I recall being told that the reason given for not submitting the MAC report was that it was an informal review of the Comanche Peak Steam Electric Station Project and was used only as a management tool and therefore was not subject to discovery. Since I was not familiar with the details surrounding the hiring of MAC to perform the work in 1978 and did not participate in the MAC review itself and had never read the MAC report, and since the decision had already been made by an officer or officers senior to me in the TUGCO organization, it did not seem appropriate to me at that time to revisit the matter with those to whom I reported. I had no conversations with Messrs. Fikar, Gary, or Brittain concerning the discoverability of the MAC report in connection with CASE's request for information.


B. R. CLEMENTS

SUBSCRIBED AND SWORN TO before me by the said B. R. CLEMENTS on this, the 8TH day of AUGUST, 1985.


Notary Public in and for Dallas
County, Texas

My Commission Expires:

7-1-89