

AFFIDAVIT OF
U. D. DOUGLAS

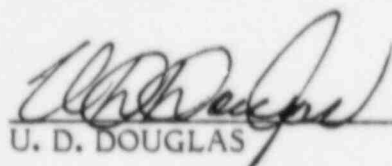
THE STATE OF Alabama :
 :
COUNTY OF Montgomery :

BEFORE ME, the undersigned authority, a Notary Public in and for Montgomery County, Alabama, on this day personally appeared U. D. DOUGLAS, who by me being duly sworn upon his oath deposes and says:

My name is U. D. Douglas. I am presently employed by Blount International, Limited in Montgomery, Alabama. My telephone number is 205/277-8860.

I recall being interviewed by Management Analysis Company ("MAC") in connection with their management quality assurance review of Comanche Peak in 1978. At the time of the MAC review in 1978, my position at Comanche Peak was Construction Project Manager for Brown & Root. I knew that MAC had issued a report, received a copy of the report, and read it. I did not take a copy with me when I left the project.

I left the Comanche Peak Project in November of 1979. I was not aware that in July, 1980, a request for discovery was made by the Intervenor, CASE, of evaluations, studies, or audits that had been conducted at Comanche Peak and I did not participate in any discussions regarding whether or not the MAC report should be produced in response to CASE's discovery request.


U. D. DOUGLAS

SUBSCRIBED AND SWORN TO before me by the said U. D. DOUGLAS on
this, the 9th day of August, 1985.

Martha G. Shite
Notary Public in and for Montgomery
County, Alabama

My Commission Expires:

July 31, 1988