

AFFIDAVIT OF  
DOUG FRANKUM

THE STATE OF TEXAS  
COUNTY OF SOMERVELL

BEFORE ME, the undersigned authority, a Notary Public in and for SOMEAVALLE County, Texas, on this day personally appeared DOUG FRANKUM, who by me being duly sworn upon his oath deposes and says:

My name is Doug Frankum. I am employed by Brown & Root, Inc. at the Comanche Peak Steam Electric Station site near Glen Rose, Texas. My present position is Senior Project Manager. I held this same position on December 31, 1984.

I was aware generally that Management Analysis Company ("MAC") was on the Comanche Peak site sometime in 1978 doing a review of TUGCO's Quality Assurance Program. I have been at the Comanche Peak site since 1977 and have never seen a copy of the MAC report as of this date. I did not receive a copy of the report nor have I read same. Furthermore, while I had been generally aware that the Intervenor, CASE, in the licensing proceeding has requested a lot of documents, I was not aware of the specific documents they requested, did not know that they had made a request which would have included a report by MAC, and I did not participate in any discussions regarding whether the MAC report should be produced in response to the CASE discovery requests.

*Doug Frankum*  
DOUG FRANKUM

SUBSCRIBED AND SWORN TO before me by the said DOUG FRANKUM on  
this, the 12<sup>th</sup> day of AUGUST, 1985.

Bess G. Hodges  
Notary Public in and for Schenley  
County, Texas

My Commission Expires:

MARCH 28, 1988