

AFFIDAVIT OF
JOHN T. MERRITT, JR.

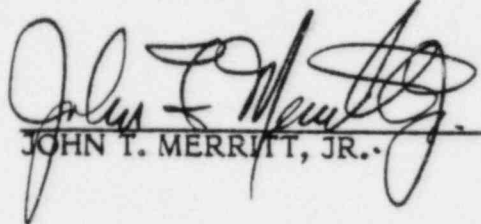
THE STATE OF TEXAS :
 :
COUNTY OF DALLAS :

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

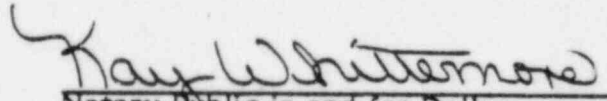
My name is John T. Merritt, Jr. I am employed by Texas Utilities Generating Company as the Assistant Project General Manager at the Comanche Peak Steam Electric Station, P. O. Box 1002, Glen Rose, Texas 76043. My present business telephone number is 817/897-2722. I was the Assistant Project General Manager for TUGCO on December 31, 1984. In 1980, I was Manager of Engineering and Construction for Texas Utilities Services Inc. at the Comanche Peak Project site.

In 1978, I was aware that Management Analysis Company ("MAC") reviewed TUGCO's Quality Assurance Program at Comanche Peak. Although I do not specifically remember an interview, I am aware that my name appears in the report as having been interviewed and I do not deny that such interview took place. I was not aware that MAC had issued a written report to TUGCO management in which it described the results of its review until I first saw the report in late May, 1985. Prior to that time, I never had in my possession a copy of the report. I do not recall attending any pre- or post-audit meetings with representatives of MAC in connection with their review. I recall a meeting in 1978 to discuss MAC's recommendations and TUGCO's responses thereto but, again, I was not aware that there was any written report to TUGCO management.

Prior to May 29, 1985, I was not aware that CASE, the Intervenor in the Comanche Peak licensing proceedings, had in July of 1980 requested information from TUGCO as to all "evaluations, studies, or audits" which have been conducted at Comanche Peak.


JOHN T. MERRITT, JR.

SUBSCRIBED AND SWORN TO before me by the said JOHN T. MERRITT, JR. on this, the 8TH day of AUGUST, 1985.


Notary Public in and for Dallas
County, Texas

My Commission Expires:

7-1-89