

AFFIDAVIT OF
SUSAN SPENCER PALMER

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 SUSAN SPENCER PALMER, who by me being duly sworn upon her oath deposes and says:

My name is Susan Spencer Palmer. I am employed by Texas Utilities Generating Company as a Senior QA Auditor. I office at 400 N. Olive Street, Dallas, Texas 75201 and live at 2955 Tumbleweed Trail, Grapevine, Texas 76051. My office telephone number is 214/979-8861 and my home telephone number is 817/488-8247. I have been an employee of TUGCO since January of 1979 and was originally hired as an Associate QA Auditor. At the time I first learned about a report having been prepared by Management Analysis Company ("MAC") in connection with a management review of the TUGCO organization at Comanche Peak Steam Electric Station was in 1979 or 1980. I was a Senior QA Auditor and Supervisor, QA Administration for TUGCO on December 31, 1984.

Sometime in 1979 or 1980 I became aware that, prior to that time, MAC had reviewed the TUGCO organization, including the QA organization, at Comanche Peak. I had not seen a copy of the MAC report, and never had a copy in my possession or subject to my control, until I received a copy of Mr. R. A. Wooldridge's letter to the Licensing Board of May 29, 1985. I did not read the report until sometime thereafter. I first became aware of the MAC review through casual conversation with Dave Chapman, and possibly others, in 1979 or 1980. In 1980 I assisted in gathering information to respond to the request for information made by CASE, the Intervenor in the Comanche Peak licensing proceedings. At

that time, I recall having heard about the work which had been performed by MAC and I asked Dave Chapman about the MAC report and whether it was subject to the discovery request. Mr. Chapman told me that a decision had been made and that the report would not be supplied in response to the interrogatory. It is my understanding that that decision was made by one or more members of TUGCO management but no name or names of the person or persons who made the decision was mentioned. I recall that I also mentioned the MAC report to John Marshall but I do not recall any specific response which he made about the matter. Since I was not even employed by TUGCO when the MAC review was performed and the report was written, was not aware of the circumstances surrounding the decision to have the review performed and had never seen nor read the report, I did not feel that I was in a position to second guess decisions made by my superiors. While I do not recall any specific conversations, it is possible that the matter of the MAC report and its discovery in 1980 was also discussed with Ron Tolson or others in the TUGCO QA organization at the time.

Susan Spencer Palmer
SUSAN SPENCER PALMER

SUBSCRIBED AND SWORN TO before me by the said SUSAN SPENCER PALMER on this, the 9th day of August, 1985.

Glenda Benson
Notary Public in and for Dallas
County, Texas

My Commission Expires:

2-17-89

GLEND A BENSON, Notary Public
in and for Dallas County, Texas
My Commission Expires 2-17-89