

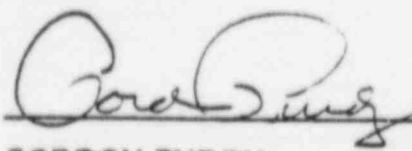
AFFIDAVIT OF
GORDON PURDY

THE STATE OF TEXAS :
COUNTY OF SOMERVILLE :

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

My name is Gordon Purdy. I am presently employed with Comanche Peak Steam Electric Station near Glen Rose, Texas as a contract employee for Brown & Root. I was in Spain in the U.S. Navy in 1978. I was not employed at the Comanche Peak site in 1980. I have no knowledge of a review performed by Management Analysis Company ("MAC") of the Quality Assurance Program at Comanche Peak in 1978. I was not aware that MAC issued a report until May, 1985, and had not received a copy of such report prior to that time nor had I read same. I did not participate in any discussions regarding whether the MAC report should be produced in response to the discovery request by the Intervenor, CASE, in the Comanche Peak licensing proceeding.

I first became aware of the MAC report when it was mentioned in a management meeting conducted by Mr. J. Merritt at the Comanche Peak Steam Electric Station site sometime in May of 1985. At that time, I was Site QA Manager for Brown & Root. This is the same position I have held since November of 1981. I held this position as of December 31, 1984.


GORDON PURDY

SUBSCRIBED AND SWORN TO before me by the said GORDON PURDY on
this, the 12th day of August, 1985.

Billie J. Meyer
Notary Public in and for Flood
County, Texas

My Commission Expires:

10/25/86