

AFFIDAVIT OF  
HOMER C. SCHMIDT

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 HOMER C. SCHMIDT, who by me being duly sworn upon his oath deposes and says:

My name is Homer C. Schmidt. I am Manager of Nuclear Services for Texas Utilities Generating Company at 400 N. Olive Street, Dallas, Texas 75201. My telephone number is 214/979-8234.

On or about May 9, 1985, I first became aware that Management Analysis Company ("MAC") had performed a review or audit of the Quality Assurance Program for TUGCO at Comanche Peak Steam Electric Station. Prior to that time, I never had in my possession a copy of such report and had not read same. I was not interviewed by MAC in 1978 and did not attend any pre- or post-audit meetings. The MAC report came to my attention through a review of Quality Assurance documents for the ongoing prudency audit being conducted for Texas Utilities Electric Company.

As Manager of Nuclear Services with the responsibility for licensing, in 1980, I was generally aware of discovery requests from the Intervenor in the licensing proceedings. I was also aware that on or about July 7, 1980, CASE requested information from TUGCO as to evaluations, studies, and audits which had been conducted at Comanche Peak. At the time of such discovery requests and at all times up until on or about the 9th day of May, 1985, I was not aware of the existence of the MAC report and I have not participated in any discussions

regarding whether the MAC report should be produced in response to CASE's request for information.

My position has been Manager of Nuclear Services. I was employed in such capacity for TUSI in 1980 and for TUGCO on December 31, 1984.

In addition, I have read the answers to Question 1, and all subparts thereof, of CASE's Interrogatories in connection with the MAC report and such answers are true and correct.

Homer C. Schmidt  
HOMER C. SCHMIDT

SUBSCRIBED AND SWORN TO before me by the said HOMER C. SCHMIDT on this, the 8<sup>th</sup> day of August, 1985.

Jeri Smart  
Notary Public in and for Dallas  
County, Texas

My Commission Expires:

November 13, 1988.