

AFFIDAVIT OF  
RONALD G. TOLSON

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 RONALD G. TOLSON, who by me being duly sworn upon his oath deposes and says:

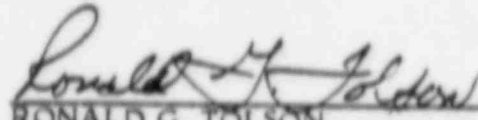
My name is Ronald G. Tolson. I am employed in private industry as a consulting engineer. I can be contacted through Robert A. Wooldridge at 214/979-3014.

During the year 1978, I was the site QA supervisor for Texas Utilities Generating Company at the Comanche Peak Steam Electric Station construction project. I held this same job in 1980. Sometime in March of 1984, I ceased being the QA supervisor at Comanche Peak and was at that time assisting Joe B. George at the project site. Sometime in November of 1984, I moved to the Dallas office of TUGCO to assist John Marshall on TUGCO licensing matters. I left the employ of TUGCO in February of 1985.

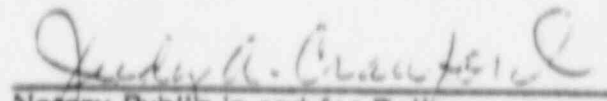
I recall that in 1978 Management Analysis Company ("MAC") performed a management review of TUGCO at Comanche Peak. I do not recall attending any pre-audit meetings but I was interviewed by a MAC representative in connection with their review. I do not recall attending any post-audit meetings with representatives of MAC but I did attend an internal meeting of TUGCO personnel to discuss the recommendations made by MAC. I recall reading the report in 1978 and I participated in preparing a written response, same being the response signed by R. J. Gary and L. F. Fikar to P. G. Brittain, a copy of which was attached to Mr. Wooldridge's May 29, 1985 letter to the Licensing Board.

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In 1980, I was generally aware that CASE, the Intervenor in the licensing proceedings, had requested information from TUGCO. I recall a discussion with Dave Chapman concerning whether the MAC report was to be produced in response to CASE's discovery request. Mr. Chapman told me that TUGCO management had decided that the report was not subject to the discovery request. I do not recall whether he told me who had made such decision however. I do not recall having any conversations with L. F. Fikar, R. J. Gary, or B. R. Clements about this matter and I recall no discussions at that time with anyone other than Dave Chapman and possibly Susan Spencer Palmer but it is certainly possible that the matter was discussed with other TUGCO personnel.

  
RONALD G. TOLSON

SUBSCRIBED AND SWORN TO before me by the said RONALD G. TOLSON  
on this, the 8<sup>th</sup> day of August, 1985.

  
Notary Public in and for Dallas  
County, Texas

My Commission Expires:

4-24-87