

**AFFIDAVIT OF CHARLES G. THRASH**

Charles G. Thrash, being duly sworn, deposes and says that the following answers are true and correct to the best of his knowledge and belief:

Q. 1. Please explain the process you followed for preparing the minutes of the Management Committee meetings (or, as applicable, minutes of the meetings of the Management Committee with the Chief Executive Officers) of April 27, 1981; June 26, 1981; July 23, 1981; and July 24, 1981.

A. My notes of Management Committee meetings were made using the same "process" I had used for 40 years -- as a college student, army officer in World War II, civil engineer and lawyer -- try to capture, in a sort of personal "shorthand", the essence of what people say, to assist <sup>my</sup> memory in later recalling spoken words. Then, in producing the minutes, I exercised judgment, based on nearly 10 years experience as Secretary of the Management Committee, of what the Management Committee members wanted in the minutes. The Management Committee is only required to keep a written record of its actions and decisions.

The draft meeting minutes were sent to the members of the Management Committee, and the alternates. The Management Committee considered and approved these drafts at one of the next few meetings, with or without revision.

Q. Were the attached notes (Attachment A) taken by you?

A. The pencil (handwritten) notes were.

Q. If so, did you take them contemporaneously with the discussion?

A. Yes.

Q. In particular, please explain how your handwritten notes of these meetings were used in the preparation of the final minutes.

A. As described above, the pencil notes were used as a basis for dictated draft minutes.

Q. 2. Portions of your handwritten notes (and typed transcriptions) of those four meetings are attached as Attachment A. To the best of your recollection, please answer the following questions with respect to each of the excerpts from those notes which are specified in Attachment B:

(A) Is the excerpt a verbatim transcript of statements made by the individuals to whom they are attributed?

A. No, not verbatim.

Q. If not, please explain the relationship of the excerpt to the statements made at the meeting.

A. As explained in answer to question 1, the notes are my personal "shorthand" of the essence of what people said.

Q. Does the excerpt represent, to the best of your recollection, the essence of the discussion?

A. I have very little recollection, now, of most 1981 discussions. The pencil notes represented my understanding, at the time I made the notes, of the essence of statements made.

Q. (B) Identify any portions of the excerpt which reflect your own comments or observations instead of statements made by members of the Management Committee or others in attendance.

A. Aside from the times noted in the margin, I can find four of my "own comments": "? What do?" at 81086; "Ex. 8 still on screen" at 81088; "Where [or when] do we file these?" at 81090; and "GO didn't leave" at 81113.

Q. (C) By what process did you decide whether the excerpt would or would not be reflected in the final minutes?

A. This is purely an exercise of judgment, as explained in answer 1.

Q. (D) Did you have any discussions during the meetings or subsequent thereto regarding whether the discussion covered by the excerpt would be included in the final minutes?

A. No.

Q. (E) With respect to each excerpt, and to the best of your recollection, to the extent that matters derived from the excerpt were recorded either in draft or final committee minutes, were there any changes between what appeared (or did not appear) in the draft and final Committee minutes? If so explain why and how the changes occurred.

A. There were no such changes.

Q. 3. (A) Regarding Excerpt #5: With respect to the line which reads "(we may have lucked out)," do you recall who said these words, if anyone? Do you have any recollection of the discussion of the topic to which these words relate? If so please summarize your additional recollection.

A. I have no recollection, now, of this discussion. Based on my notes, "lucked out" was probably said by Goldberg and meant that underdesign (not found) could have resulted in starting design over, delay, etc., while overdesign, while not economic, would not affect the schedule.

Q. (B) Regarding Excerpt #5: Starting at "Bottom line - Review of May 7" to "5. Potential - need further investig.": Do you have any additional recollection of the discussion regarding the statement "Will have to report to NRC" which has an arrow pointing to Category 1? If so, please summarize your additional recollection.

A. I have no additional recollection.

Q. Can you explain the sequence "1, 2, 4 and 5" for the four categories which apparently were discussed?

A. It is possible that the numbering of the four categories was an error in my notes.

Q. 4. On page 00472 in the "13 Maj Prob List" why was the word "audit" struck and replaced with "review" in item 6?

A. I have no recollection, now, of this discussion. Based on my notes of the meeting, it appears that this nomenclature was corrected later in the meeting.

Q. 5. (A) Regarding Excerpt #6: Starting at "--will Quadrex report go to PUC" to "(Austin reporter has asked Gold. about)": Do you have any additional recollection as to the discussion you recorded as "[Goldberg] has refused to send to NRC"? If so, please summarize your additional recollection.

A. I have no additional recollection.

Q. (B) Regarding Excerpt #6: With respect to the line "Poston Q re copies to intervenors" do you have any additional recollection regarding the discussion of this item? If so, please summarize your additional recollection.

A. I have no additional recollection.

Q. 6. Regarding Excerpt #7: Starting at "Von R -- would B&R agree to let "B"". Is "B" Bechtel?

A. No, "B" was probably either algebraic or Black & Veatch.

Q. What is the reference to "34"?

A. Based on my notes of the meeting, 34 refers to the need for 34 "hot shots" instead of 20. (See p. 81119)

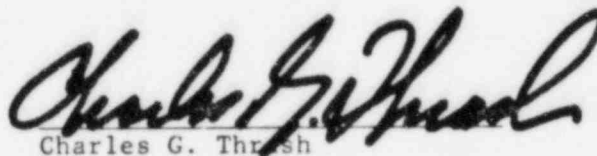
Q. What is the reference "PM" in "Poston -- I hope PM?"

A. PM was usually my shorthand for Project Manager. "I hope PM" was either a non-understood or unfinished statement.

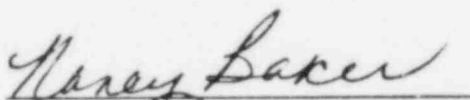
Q. 7. Regarding Excerpt #8: Starting at "Poston -- are there any real serious prob areas": Do you have any additional recollection as to the discussion recorded in the parenthetical remark "(blow out of water)"? If so, please summarize your additional recollection. Do you have any additional recollection as to the discussion recorded in the quoted remark "all high risk," i.e. risk of what? If so, please summarize your additional recollection.

A. I have no additional recollection of this discussion. Based on my notes, it appears that "blow out of water" and "all high risk", refer to the risk of schedule delay and the possibility that the Project schedule might be "blown out of the water".

Dated: 4 Sept., 1985

  
Charles G. Thresh

Sworn to and subscribed before me this 4<sup>th</sup> day of Sept,  
1985.

  
Nancy Baker  
Notary Public

My Commission Expires: 9/1/86