

AFFIDAVIT OF
GARY KRISHNAN

THE STATE OF TEXAS :

COUNTY OF SMITH :

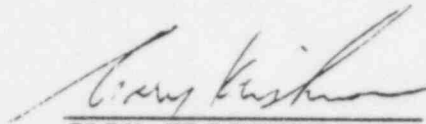
BEFORE ME, the undersigned authority, a Notary Public in and for SMITH County, Texas, on this day personally appeared GARY KRISHNAN, who by me being duly sworn upon his oath deposes and says:

My name is Gary Krishnan. I am employed by Gibbs & Hill as a Mechanical Engineer in TUGCO Nuclear Engineering at the Comanche Peak Steam Electric Station. I assumed this assignment in August, 1985. In December, 1984 I was in the Site Stress Analysis group in the Gibbs & Hill Mechanical Engineering Department at the Comanche Peak site. I began work on the Comanche Peak Steam Electric Station in October, 1978 with Gibbs & Hill in New York City, New York. I moved to the site in April, 1981.

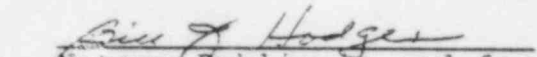
I was not interviewed by Management Analysis Company ("MAC") in connection with their management quality assurance audit of the Comanche Peak Project in 1978. I was not aware that MAC had issued a report on their work, have not seen or had a copy of the report, and have not read their report.

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I was generally aware of the discovery process pertaining to the Comanche Peak licensing proceedings in 1980, but did not know of any particulars. I did not participate in any discussions as to whether the MAC report should be produced in response to the discovery request by the Intervenor, CASE, in the Comanche Peak Steam Electric Station licensing proceeding.


GARY KRISHNAN

SUBSCRIBED AND SWORN TO before me by the said GARY KRISHNAN on this, the 2nd day of DECEMBER, 1985.


Notary Public in and for
SOMEWELL County, Texas

My Commission Expires:

MARCH 28, 1988