

AFFIDAVIT OF

PETER CHANG

THE STATE OF TEXAS :

COUNTY OF Somervell :

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

My name is Peter Chang. I am presently employed by Black & Veatch, Inc. in the Civil Engineering Group at Comanche Peak. In 1978 I was employed by Black & Veatch in Kansas City. I began working at the Comanche Peak site in March, 1981. In December, 1984 I was in the Pipe Support Engineering group.

I first became aware of the MAC report from the newspapers in mid 1985. Prior to that time, I did not know that Management Analysis Company ("MAC") had conducted a review of the Comanche Peak project. I have never seen or read their report and 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.

Peter Chang
PETER CHANG

SUBSCRIBED AND SWORN TO before me by the said PETER
CHANG on this, the 2nd day of December, 1985.

Bill J. Hodges
Notary Public in and for
Seminole County, Texas

My Commission Expires:

MARCH 28, 1988