

DECLARATION OF RICHARD L. MORLEY

Richard L. Morley subscribes and declares:

1. I am employed as Manager, Central Laboratory & Field Testing Services (formerly Central Laboratory Services (CLS)) which is part of TVA's Fossil Power Group. These laboratory facilities are located at TVA's Chickamauga Dam Reservation in Chattanooga, Tennessee. I have personal knowledge of the matters stated herein.

2. I issued a memorandum to W. L. Elliot dated July 11, 1995, entitled, "CLARIFICATION OF DUPLICATE CENTRAL LABORATORIES SERVICES (CLS) TEST REPORTS CONCERNING WATTS BAR NUCLEAR PLANT (WBN) ICE CONDENSER BASKET SCREWS." The second paragraph of that memorandum states that, "On June 19, 1995, CLS issued a new report with requested clarification of the failure mechanism. This report was identified as Technical Report 95-1021 with an assigned RIMS No. E13 950619 303 and was submitted to RIMS as a QA Record."

3. My above statements in the July 11, 1995 memorandum reflected the fact that CLS had processed the June 19, 1995 report through the CLS Quality Assurance (QA) process by assigning it a RIMS accession number, E13 950619 303, and that the report was then submitted by CLS QA Document Control to the TVA RIMS organization. TVA's RIMS organization is separate and distinct from my organization, and is located in TVA's downtown offices in Chattanooga, Tennessee.

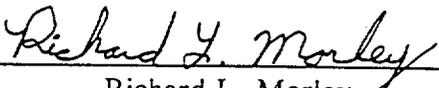
4. My statements at that time did not address, nor were they intended to address, the subsequent handling and disposition of the report by TVA's RIMS organization. Later, when it was discovered that the new report (the second report)

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could not be located in RIMS, CLS issued a Nonconformance Report (NCR 99079) documenting that said report could not be located in RIMS and corrected such by re-submitting the new report (second report) to RIMS and verifying its existence in RIMS.

5. Pursuant to 28 U.S.C. § 1746 (1994), I declare under penalty of perjury that the foregoing is true and correct.

Executed by me on this 29 day of September, 1999.


Richard L. Morley

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