MAY 1 5 1981

Lowenstein, Newman, Reis, Axelrad & Toll

22 4

## AFFIDAVIT OF TRACY DANESE

Tracy Danese, being first duly sworn, deposes and says:

- 1. My name is Tracy Danese. I am Vice President for Governmental Affairs for Florida Power & Light Company ("FPL"). I have been employed at FPL since 1974, and I was elected an officer of the company on May 15, 1975. Prior to that I was Director of Public Affairs for FPL.
- 2. In 1975, as part of the overall responsibility which I then exercised over FPL's legal and governmental affairs, I assumed responsibility for preparing a document entitled "Information Requested by the Attorney General for Antitrust Review Facility License Application" ("Information"). This document was prepared pursuant to 10 CFR Part 50, Appendix L, and was submitted to the Nuclear Regulatory Commission in Docket No. P-636A on July 14, 1975.
- 3. The information was submitted in anticipation of FPL's filing for a license to construct an undetermined number of nuclear generating units commonly referred to as the South Dade project. Plans for the construction of the South Dade project have since been abandoned.
- 4. Michael Mills, an engineer in the employ of FPL, worked under my supervision to prepare the Information.
- 5. We conferred on many occasions while the Information was being prepared. I discussed with Mr. Mills the procedures which he followed in assembling the material for the .

Information, furnished him with information about events Of which I had direct personal knowledge, and thoroughly reviewed with him drafts of the Information at the time that it was being completed.

- I have read the accompanying affidavit of Michael Mills dated May 7, 1981, and the statements contained therein accord with my own recollections of those events.
- 7. I acted in 1975 with the understanding that all documents that contained information responsive to Questions 13 and 18 in 10 CFR Part 50, Appendix L, would be located in FPL's central file. I believed that by reviewing the documents in the central file and by interviewing the people within FPL who were interviewed at the time that Mr. Mills had exhausted all the resources within FPL that could have reasonably been expected to possess information responsive to Ouestions 13 and 18.
- My intent at all times was to respond fully and candidly to the questions in Appendix L. I instructed Mr. Mills to perform his assignment with this objective.

Subscribed and sworn to before me this 137% May, 1981.

BONDED family Contracting Contraction