



UNITED STATES  
 NUCLEAR REGULATORY COMMISSION  
 WASHINGTON, D. C. 20555

JUN 08 1984

PRINCIPAL STAFF	
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Docket No. 50-329  
 Docket No. 50-330

Ms. Billie P. Garde  
 Director  
 Citizens for Accountable Government  
 Government Accountability Project  
 Institute for Policy Studies  
 1901 Que Street  
 Washington, DC 20009

Dear Ms. Garde:

This is in response to your letter of April 9, 1984 to Mr. DeYoung and Mr. Keppler commenting on Consumer Power Company's (CPCo) proposed Plan To Conduct An Independent Management Appraisal Of The Midland Nuclear Project.

As you are aware, on May 4, 1984, the NRC met with representatives of Cresap, McCormick and Paget (CMP), the firm nominated by CPCo to perform the Management Appraisal, and representatives of TERA, the firm CMP has asked to provide technical assistance. During the meeting, CMP described the Management Appraisal Plan including their response to the submitted NRC comments. Following the CMP presentation, the public was afforded the opportunity to comment on the Plan. Based on the NRC staff review of the submitted Appraisal Plan, the CMP response to the NRC comments regarding the Plan, and consideration of comments by you and other members of the public, the NRC concluded that the Plan for the Independent Management Appraisal to be performed by CMP and TERA met the requirements of the NRC Confirmatory Order dated January 12, 1984, and was adequate to provide for an assessment of the licensee's management capabilities. This approval was initially conveyed orally at the conclusion of the meeting and was confirmed by letter to CPCo dated May 11, 1984.

Your comments were directed to four particular aspects of the CMP appraisal: the independence and competence of CMP to conduct the audit, the protocol to be followed by CMP, and the objective and scope of the appraisal. As to CMP's independence, the NRC has determined that all individuals nominated to conduct the appraisal meet the independence criteria set forth by the Commission. CMP is a division of Towers, Perrin, Forster & Crosby, Inc., which performed a compensation analysis of four CPCo positions in 1983. The NRC has been informed that the two individuals who performed the compensation analysis will have no interaction with the CMP personnel performing the appraisal. Since CMP will be appraising CPCo's management, CMP has not been asked to submit information on whether its employees were previously involved in independent reviews of projects in which the Bechtel Power Corporation has had a significant role. In any event, such previous work would not necessarily indicate that the involved employees lacked sufficient independence to perform a third party review of the licensee. With respect to your comment concerning the unacceptability of TERA to perform a dual role at Midland, the NRC stated at both the May 4th public meeting and in its May 11th approval letter, that TERA is not to participate in any facet of the management appraisal which involves matters previously reviewed by TERA during the performance of the Independent Design and Construction Verification Program. Pursuant to your request, I have enclosed copies of the affidavits of independence of the individuals working on the audit.




JUN 11 1984



6/8

Attached is a copy made from the original for your use in making cc distribution. I have made copies for internal distribution except for RIII.

*Down*  
*ACB/EDO*



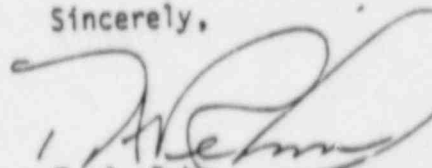
The information concerning the individuals you inquire about in your letter is as follows: Mr. Schmidt did not participate in that part of a management audit performed by CMP of PG&E for the California Utilities Commission. Mr. Nevins worked on Fort St. Vrain, Bailey, Clinton and Cardinal Unit 3 while employed by Sargent and Lundy. Mr. Wolcott has not worked for the Bechtel Power Corporation or any of its subsidiaries.

With respect to your comments regarding the protocol for the management appraisal, it should be noted that the CMP prepared protocol is similar to those protocols used for other independent reviews at Midland and at the Zimmer plant. Accordingly, the CMP protocol is acceptable to the NRC staff. However, the NRC is sensitive to the issues you raise regarding submission of draft reports, conduct of meetings, and retention and transmittal of support audit documentation. The staff has no objection to CPCo's review of the draft report, but under the protocol will receive a copy of the draft simultaneously with CPCo to ensure that the independence of the CMP report is not compromised. NRC Region III plans to attend any substantive meetings for which the protocol requires advance notice be given. Meeting minutes or transcripts will be provided to NRC and placed in the public document room. The NRC staff has reviewed the protocol's document retention provision and has no objection to it. However, copies of correspondence with CMP, including copies of draft reports to NRC and CPCo, in accordance with the protocol, will be placed in the public document room.

The NRC initially shared your concern that the objective and scope of the CMP appraisal did not meet the specifications of the January 12, 1984 confirmatory order. Thus, in a letter dated April 16, 1984 to Mr. Cook of CPCo, to Mr. Keppler indicated that the appraisal plan should include "a retrospective evaluation of sufficient past events/problems to identify the contributing factors and causes of problems and management's responses to them." At the May 4th public meeting, CMP stated it would address past events and problems as part of its review.

A followup public meeting between CMP and the NRC to further discuss the Appraisal Plan will be scheduled once CMP completes the Reconnaissance portion of the Plan. Notice of that meeting will be provided to you.

Sincerely,



T. A. Rehm  
Assistant for Operations  
Office of the Executive Director  
for Operations

Enclosure: As stated

See next page for cc's

cc w/encl:

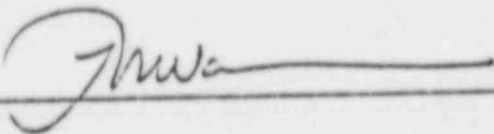
James W. Cook, Vice President, CPCo  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
The Honorable Charles Bechhoefer, ASLB  
The Honorable Jerry Harbour, ASLB  
The Honorable Frederick P. Cowan, ASLB  
William Paton, ELD  
Michael Miller  
Ronald Callen, Michigan  
Public Service Commission  
Myron M. Cherry  
Barbara Stamiris  
Mary Sinclair  
Wendell Marshall  
Colonel Steve J. Gadler (P.E.)  
Howard Levin (TERA)  
Lynne Bernabei, Government  
Accountability Project  
Stone and Webster Michigan, Inc.

STATEMENT OF INDEPENDENCE

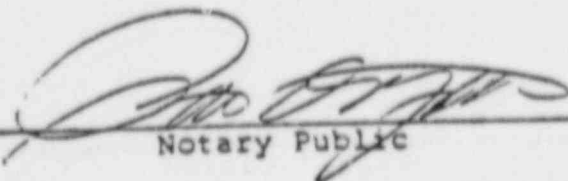
AFFIDAVIT OF LEONARD R. WASS

I, LEONARD R. WASS, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed



Sworn and Subscribed Before Me This 24<sup>th</sup> Day of February 1984

  
Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXPIRES NOV 4, 1987  
ISSUED THRU ILL. NOTARY ASSOC.

My Commission Expires \_\_\_\_\_

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF JEFFREY A. SCHMIDT

I, JEFFREY A. SCHMIDT, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Jeffrey Schmidt

Sworn and Subscribed Before Me This 24 Day of March 1984

[Signature]  
Notary Public

My Commission Expires \_\_\_\_\_

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
ISSUED 14th ILL. NOTARY STAT.



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF ANASTASSIOS D. FAKONAS

I, ANASTASSIOS D. FAKONAS, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Anastassios D. Fakonas

Sworn and Subscribed Before Me This 29th Day of February 1984

[Signature]  
Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
ISSUED TH. ILL. NOTARY ASSOC.

My Commission Expires \_\_\_\_\_

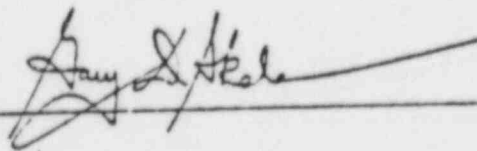


STATEMENT OF INDEPENDENCE

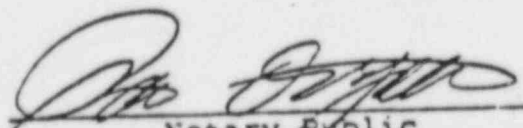
AFFIDAVIT OF GARY D. SKALA

I, GARY D. SKALA, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

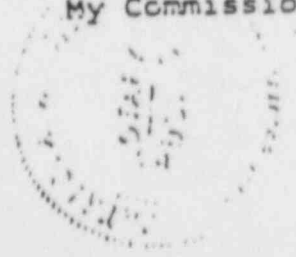
  
\_\_\_\_\_

Sworn and Subscribed Before Me This 5<sup>TH</sup> Day of March 1984

  
\_\_\_\_\_  
Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
JAMES H. HENRY, JR., Notary Public

My Commission Expires \_\_\_\_\_





STATEMENT OF INDEPENDENCE

AFFIDAVIT OF GARRETT L. DIETZ

I, GARRETT L. DIETZ, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

(see below)

---

Sworn and Subscribed Before Me This \_\_\_\_\_ Day of March 1984

\_\_\_\_\_  
Notary Public

My Commission Expires \_\_\_\_\_

N.B. Mr. Dietz is out of the country until the middle of April. He will sign this affidavit upon his return.

STATEMENT OF INDEPENDENCE

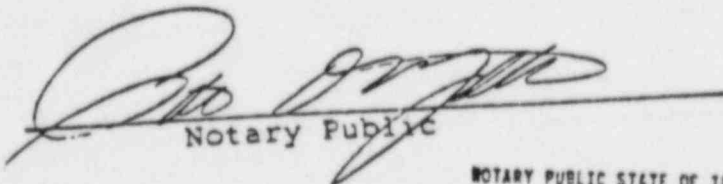
AFFIDAVIT OF DAVID GRENDER-JONES

I, DAVID GRENDER-JONES, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed



Sworn and Subscribed Before Me This 24 Day of February 1984

  
Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
ISSUED THRU ILL. NOTARY ASSOC.

My Commission Expires \_\_\_\_\_



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF RICHARD P. SNAIDER

I, RICHARD P. SNAIDER, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Richard P. Snider

Sworn and Subscribed Before Me This 28<sup>th</sup> Day of February 1984

[Signature]  
Notary Public

My Commission Expires

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
ISSUED IN ILL. NOTARY #



RICHARD P. SNAIDER

I was employed by TERA Corporation from January 1982 to September 1983. During this term of employment I served as Lead ~~Systems Engineer~~ Systems Engineer for the review of the AFW System as part of the Midland Independent Design and Construction Verification project. I also was involved in the reviews of Standby Electric Power and HVAC systems. My wife owns 200 shares of TERA stock.

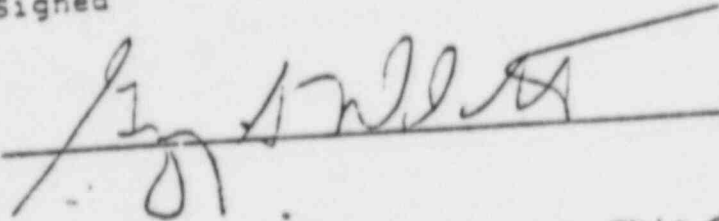
We also own shares in Energy Fund, a mutual fund run by Newberger-Berman. It invests in various stocks, including those of electric utilities. I do not have a controlling interest.

STATEMENT OF INDEPENDENCE

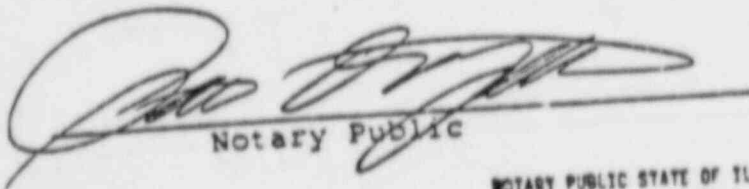
AFFIDAVIT OF GREGORY S. WOLCOTT

I, GREGORY S. WOLCOTT, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed



Sworn and Subscribed Before Me This 2nd Day of March 1984



Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
ISSUED THRU ILL. NOTARY ASSOC.

My Commission Expires \_\_\_\_\_



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF CLAYTON M. PRESS, JR.

I, CLAYTON M. PRESS, JR., am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Clayton M. Press Jr.

Sworn and Subscribed Before Me This 29th Day of February 1984

[Signature]  
Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. 12/4, 1987  
ISSUED IN ACC. NOTARY ASSOC.

My Commission Expires \_\_\_\_\_



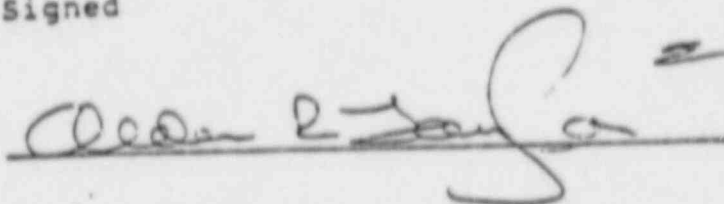


STATEMENT OF INDEPENDENCE

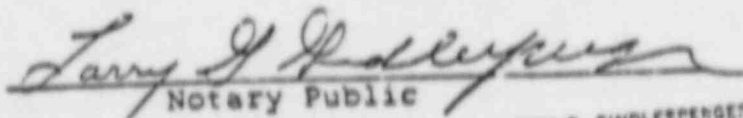
AFFIDAVIT OF ALDEN R. TAYLOR III

I, ALDEN R. TAYLOR III, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed



Sworn and Subscribed Before Me This 2<sup>nd</sup> Day of March 1984

  
Notary Public

LARRY G. GINDLESPERGER  
Notary Public, State of New York  
No. 314734531  
Qualified in New York County  
Commission Expires March 30, 1985

My Commission Expires

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF ROBERT C. LESEUR

I, ROBERT C. LESEUR, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

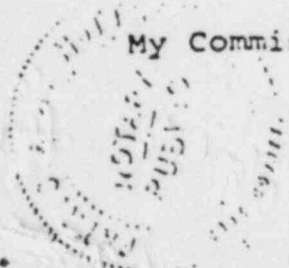
Robert C. Lesuer

Sworn and Subscribed Before Me This 27th Day of February 1984

[Signature]  
Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
ISSUED THRU ILL. NOTARY ASSOC.

My Commission Expires \_\_\_\_\_



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF BRUCE R. PITTENGER

I, BRUCE R. PITTENGER, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

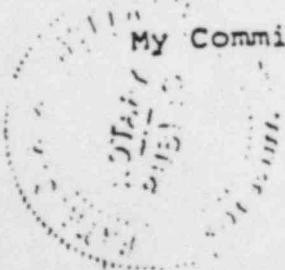
Bruce R. Pittenger

Sworn and Subscribed Before Me This 9<sup>th</sup> Day of March 1984

[Signature]  
Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
ISSUED THRU ILL. NOTARY ASSOC.

My Commission Expires \_\_\_\_\_



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF PATRICK A. NEVINS

I, PATRICK A. NEVINS, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

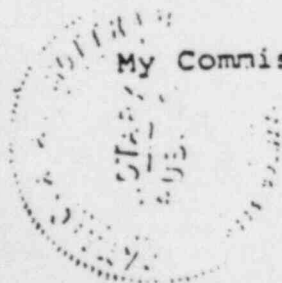
Patrick A. Nevins

Sworn and Subscribed Before Me This 9th Day of March 1984

[Signature]  
Notary Public

NOTARY PUBLIC STATE OF ILLINOIS  
MY COMMISSION EXP. NOV 4, 1987  
ISSUED THRU ILL. NOTARY ASSOC.

My Commission Expires \_\_\_\_\_



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF WILLIAM EHRENSPERGER

I, WILLIAM EHRENSPERGER, am employed by Cresap, McCormick and Paget, a Division of Towers, Perrin, Forster & Crosby, Inc. I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear Project. I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual funds or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives who are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

William Ehrensperger

Sworn and Subscribed Before Me This 3rd Day of March 1984

Dorothy Edwards  
Notary Public

My Commission Expires \_\_\_\_\_

Notary Public, Georgia, State at Large  
My Commission Expires Aug 18, 1985



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF JOHN W. BECK

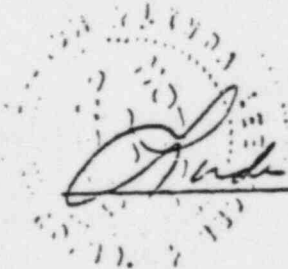
My name is JOHN W. BECK. I am employed by TERA Corporation.

I am currently assigned to the team which is conducting an independent management appraisal of the Midland Nuclear project. Prior to being given this assignment, I have been involved with the Midland Independent Design and Construction Verification Program (IDCV) reviewing activities outside the scope of the Independent Management Appraisal Program (IMAP). With the exception of the IDCVP, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

John W. Beck

Sworn and Subscribed Before Me This 22<sup>nd</sup> Day of February 1984

 Arthur LeKoff  
Notary Public

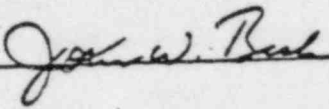
My Commission Expires My Commission Expires July 1, 1986



ATTACHMENT TO AFFIDAVIT OF JOHN W. BECK

I currently own shares in the JANUS FUND, a mutual fund over which I have no control.

Signed

 \_\_\_\_\_



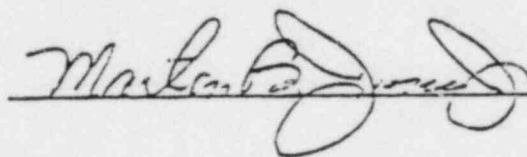
STATEMENT OF INDEPENDENCE


AFFIDAVIT OF Martin B. Jones, Jr.

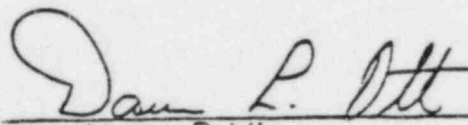
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Signed



Sworn and Subscribed Before Me This 5 Day of ~~February~~ <sup>MARCH</sup> 1984 

  
Notary Public

My Commission Expires 9-16-93



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF Frank A. Dougherty

My name is Frank A. Dougherty. I am employed by TERA Corporation.

I am currently assigned to the team which is conducting an independent management appraisal of the Midland nuclear project. Prior to being given this assignment, I have been involved with the Midland Independent Design and Construction Verification Program (IDCV) reviewing activities outside the scope of the Independent Management Appraisal Program (IMAP). With the exception of the IDCV, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

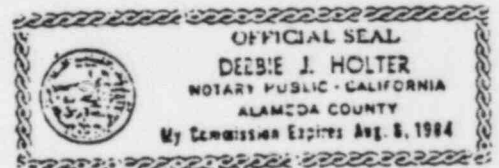
Signed

Frank A. Dougherty

Sworn and Subscribed Before Me This 22nd Day of February 1984

Debbie J. Holter  
Notary Public

My Commission Expires August 6, 1984



B-84-98



TERA CORPORATION

Mutual Funds

Merrill Lynch CMA Money Trust  
Kemper Money Market  
Daily Interest Fund

Mathera Fund

Energy Fund

20th Century Growth Fund

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF HOWARD A. LEVIN

My name is HOWARD A. LEVIN. I am employed by TERA Corporation.

I am currently assigned to the team which is conducting an independent management appraisal of the Midland nuclear project. Prior to being given this assignment, I have been involved with the Midland Independent Design and Construction Verification Program (IDCV) reviewing activities outside the scope of the Independent Management Appraisal Program (IMAP). With the exception of the IDCVP, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Howard A. Levin

Sworn and Subscribed Before Me This 22<sup>nd</sup> Day of February 1984

Arthur Lee Robb  
Notary Public

My Commission Expires My Commission Expires July 1, 1986

List of Mutual Funds - Howard A. Levin

AG Pace

Merrill Lynch CMA

Government Services Money Fund



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF LAWRENCE H. WIGHT

My name is Lawrence H. Wight. I am employed by TERA Corporation.

I am currently assigned to the team which is conducting an independent management appraisal of the Midland nuclear project. Prior to being given this assignment, I have been involved with the Midland Independent Design and Construction Verification Program (IDCV) reviewing activities outside the scope of the Independent Management Appraisal Program (IMAP). With the exception of the IDCVP, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

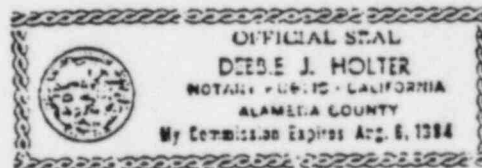
Signed

LHW

Sworn and Subscribed Before Me This 23rd Day of February 1984

Debbie J. Holter  
Notary Public

My Commission Expires Aug 6, 1984



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF FREDERICK A. PELLERIN

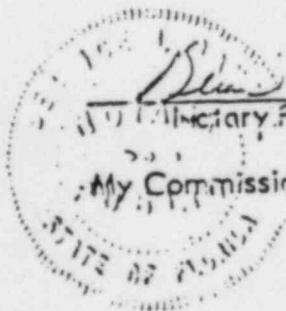
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Signed

*Frederick A. Pellerin*

Sworn and Subscribed Before Me This 22<sup>nd</sup> Day of February 1984



Blair L. Omi  
Notary Public

My Commission Expires

Notary Public, State Of Florida At Large  
My Commission Expires Feb 11, 1985

STATEMENT OF INDEPENDENCE

AFFIDAVIT OF FRANK L. BAMFORD

My name is FRANK L. BAMFORD. I am employed by TERA Corporation.

I am currently assigned to the team which is conducting an independent management appraisal of the Midland nuclear project. Prior to being given this assignment, I have been involved with the Midland Independent Design and Construction Verification Program (IDCV) reviewing activities outside the scope of the IDCVP, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

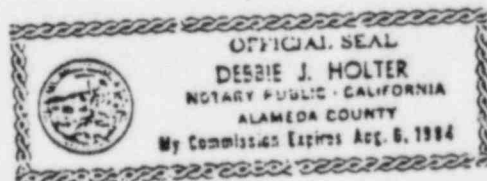
Signed

Frank L. Bamford

Sworn and Subscribed Before Me This 23rd Day of February 1984

Debbie J. Holter  
Notary Public

My Commission Expires Aug. 6, 1984



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF DON K DAVIS

My name is DON K. DAVIS. I am employed by TERA Corporation.

I am currently assigned to the team which is conducting an independent management appraisal of the Midland nuclear project. Prior to being given this assignment, I have been involved with the Midland Independent Design and Construction Verification Program (IDCV) reviewing activities outside the scope of the Independent Management Appraisal Program (IMAP). With the exception of the IDCV, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

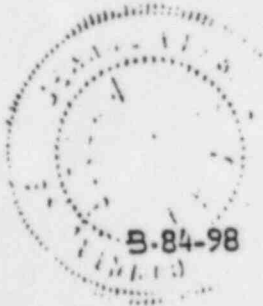
Signed

Don K Davis

Sworn and Subscribed Before Me This 21<sup>st</sup> Day of February 1984

Jeanne Ann Scoles  
Notary Public

My Commission Expires My Commission Expires Sep. 21, 1982



STATEMENT OF INDEPENDENCE

AFFIDAVIT OF DONALD B. TULODIESKI

My name is DONALD B. TULODIESKI. I am employed by TERA Corporation.

I am currently assigned to the team which is conducting an independent management appraisal of the Midland nuclear project. Prior to being given this assignment, I have been involved with the Midland Independent Design and Construction Verification Program (IDCV) reviewing activities outside the scope of the Independent Management Appraisal Program (IMAP). With the exception of the IDCVP, I have never worked on any job or task associated with the Midland Project, or any job or task for or on behalf of Consumers Power Company, Bechtel, or the Babcock and Wilcox Company relating to issues that I am reviewing. I have never been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox Company. I do not own any shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock. Mutual fund or other funds in which I may have a beneficial interest, but over which I have no control, may own shares of Consumers Power Company, Bechtel, or Babcock and Wilcox stock, of which I am unaware. A list of such funds in which I have an interest are attached. I have no relatives which are or have been employed by Consumers Power Company, Bechtel, or Babcock and Wilcox.

Signed

Donald B. Tulodieski

Sworn and Subscribed Before Me This 22<sup>nd</sup> Day of February 1984

John Lee Robb  
Notary Public

My Commission Expires July 1, 1985

\* Employed by Babcock & Wilcox Co. from 1973 to 1978. Final position was Project Manager for Toledo Edison, Davis Besse Units.