

AFFIDAVIT OF
ROBERT SPANGLER

THE STATE OF TEXAS :
 :
COUNTY OF DALLAS :

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

My name is Robert Spangler. I am presently Supervisor of QA services for Texas Utilities Generating Company in Dallas, Texas. I have held that position since May of 1984. Prior to that time, I was a Staff Engineer holding the title of Senior Engineer working in operations support in connection with the Comanche Peak Steam Electric Station Project. I began that job in June of 1982. From the middle of 1981 until June of 1982, I was employed by Johnson Controls. Prior to that time, I was employed by the Nuclear Regulatory Commission, Region IV, and was employed by the NRC in 1978.

Sometime after May of 1984, when I was transferred to TUGCO QA in Dallas, I became aware that Management Analysis Company ("MAC") had reviewed the TUGCO QA program at Comanche Peak sometime in the past. I did not have a copy of the report and first read the report sometime after May 29, 1985, when a copy of the report was filed with the Licensing Board. I do not recall from whom I first heard about the MAC review but it was my general understanding that it was a confidential document and was not a part of the QA records for Comanche Peak. In late April or early May, 1985, Andy Jones, who was gathering information in connection with Texas Utilities Electric Company's prudence audit, asked me about the MAC report. I told him that it was my understanding that it was a confidential document and suggested that he talk with Dave Chapman about the matter. It is

my understanding that he did so. At that time, I was not aware that there was any question concerning the previous discoverability of the MAC report in connection with requests for information in the Licensing Board proceedings.

Robert Spangler
ROBERT SPANGLER

SUBSCRIBED AND SWORN TO before me by the said ROBERT SPANGLER on this, the 7th day of August, 1985.

Jeri Smart
Notary Public in and for Dallas
County, Texas

My Commission Expires:

November 13, 1988.