

Monsanto

FROM (NAME & LOCATION)

D. D. Kos - O-11

PLAINTIFF'S EXHIBIT

MON-2082

DATE December 8, 1982
SUBJECT SHAC Recommendations
Incident Report 82-22
REFERENCE
TO :SAC

cc. SHAC

SHAC was assigned two items for further investigation as a result of the chemical contact incident in Department 50 on 8/8/82. SHAC findings and recommendations are summarized below.

Safety Shower Alarm Bypass

The investigation report 82-22, recommendation #8 states: "Consider whether or not the practice of deactivating audible safety shower alarms during testing of showers is acceptable."

SHAC has considered this concern in light of existing procedures or practices for testing shower systems. Procedure Bulletin P-0116 lists eyebath/shower testing as an ANSI requirement. The minimum frequency is one week, and alarm testing is an important part of the testing requirement. The practice of bypassing the shower alarms during testing is likely to limit the ability to ensure each alarm is working properly, prevent immediate response to a chemical contact incident while in the bypass mode, and is not in keeping with the intent of P-0123 in relation to critical safety alarm bypassing. The advantage of this practice is reduction of boardman and operator communications and reduction of repetitive alarms as each shower is tested. This can be important during high activity periods.

In summary, SHAC feels the advantages of the practice are far outweighed by the disadvantages. The following is recommended: (1) Safety shower alarm bypassing for test purposes be allowed in a unit only after thorough review and approval of the LP&S Department and the responsible general superintendent. (2) PMSB communicate this policy which is in keeping with the intent of P-0116 procedure bulletin.

Crowsfoot Usage Policy

The assignment from investigation report 82-22, recommendation #7 states: "Consider whether or not it would be advisable to eliminate the use of carbon steel crowsfoot connectors in the plant, except for special applications."

In this incident the use of a corroded crowsfoot with a swollen rubber seal contributed to the difficulty in removing hose. Throughout the plant carbon steel crowsfoot connectors, as well as carbon steel Thor fittings, are used on utility stations. In some units (material handling, methanol, etc.) the permanent installation of these fittings on process piping is necessary for sustaining day-to-day operations. However, as is always the case, these connections must be inspected before use.

LAM003273

SC

002068

Other concerns related to this incident and several recent incidents are the installation of crowsfoot connections on process systems without a visible approval mechanism, and the use of crowsfeet or Thor connections on systems not provided with bleeds.

SHAC recommends the following:

1. Establish the following policy:

The permanent installation of crowsfeet or Thor fittings on process equipment be approved by the manufacturing superintendent. Consideration should be given to proper material of construction for the service.

The temporary installation of crowsfeet or Thor fittings on process equipment must be approved by manufacturing supervision. He is responsible for subsequent removal.

2. The above policy and the following reminder be included in a bulletin board announcement.

All utility stations should conform to the plant standard which includes provision for a bleeder valve. Prior to the use of utility hoses, the condition of the connections must be inspected (connection corrosion or rubber grommet aging), and the utility station bleed valve must be checked to ensure operability. Bleed valves are not to be used as another hose connection.

D. D. Kos
for SHAC

lw

HAZARDOUS SAMPLE OR MATERIAL STORAGE

Recently there have been a number of minor incidents related to the presence of hazardous samples or materials in office areas. As a result, the Plant Manager's Safety Board has approved the following policy statement:

ALL SAMPLE OR OTHER MATERIAL CONTAINERS WHICH ARE UNIDENTIFIED OR WHICH CONTAIN HAZARDOUS (FLAMMABLE, CORROSIVE, OR TOXIC) MATERIALS MAY NOT BE STORED IN ANY OFFICE AREA. ALL SAMPLES OR HAZARDOUS MATERIALS ARE TO BE STORED IN A LAB OR A DESIGNATED CONTROLLED STORAGE AREA.

CHEMICALS WHICH ARE NORMALLY USED IN OFFICE AREAS (COPY BLUEPRINT MACHINE CHEMICALS, LIGHTER FLUID, ETC.) ARE ACCEPTABLE IF STORED IN PROPER AND LABELED CONTAINERS.

If any questions arise, contact the LP&S Department for interpretation.

D. D. Kos
SHAC Chairman