

.....

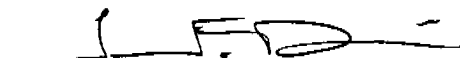
The Dow Chemical Co

May 21, 1997

Re: HAZOP Study for CA2 Chlorine Chemical Exposure Index (CEI) Scenarios

A CEI calculation greater than 200 requires the consideration of a further risk assessment, normally a HAZOP, for the area defined in the CEI scenario. Such a HAZOP was performed in 1996 on the CEI scenarios involving liquid and 95% gaseous chlorine defined for the CA2 plant. Since the CEI scenarios have not changed and all action items generated by the HAZOP study have been completed, another HAZOP study at this time is unnecessarily redundant. Therefore, the CA2 plant has completed its responsibility with regard to consideration of a further risk assessment and finds no additional value in doing that at this time. Future risk assessment will be performed during Consolidated Audits and if the CEI scenarios change via the MOC policy.

Sincerely,



John F. Dizor
CA2 Area Engineer

Approved: McBlane 5/21/97



.....

DO A 029381
CONFIDENTIAL