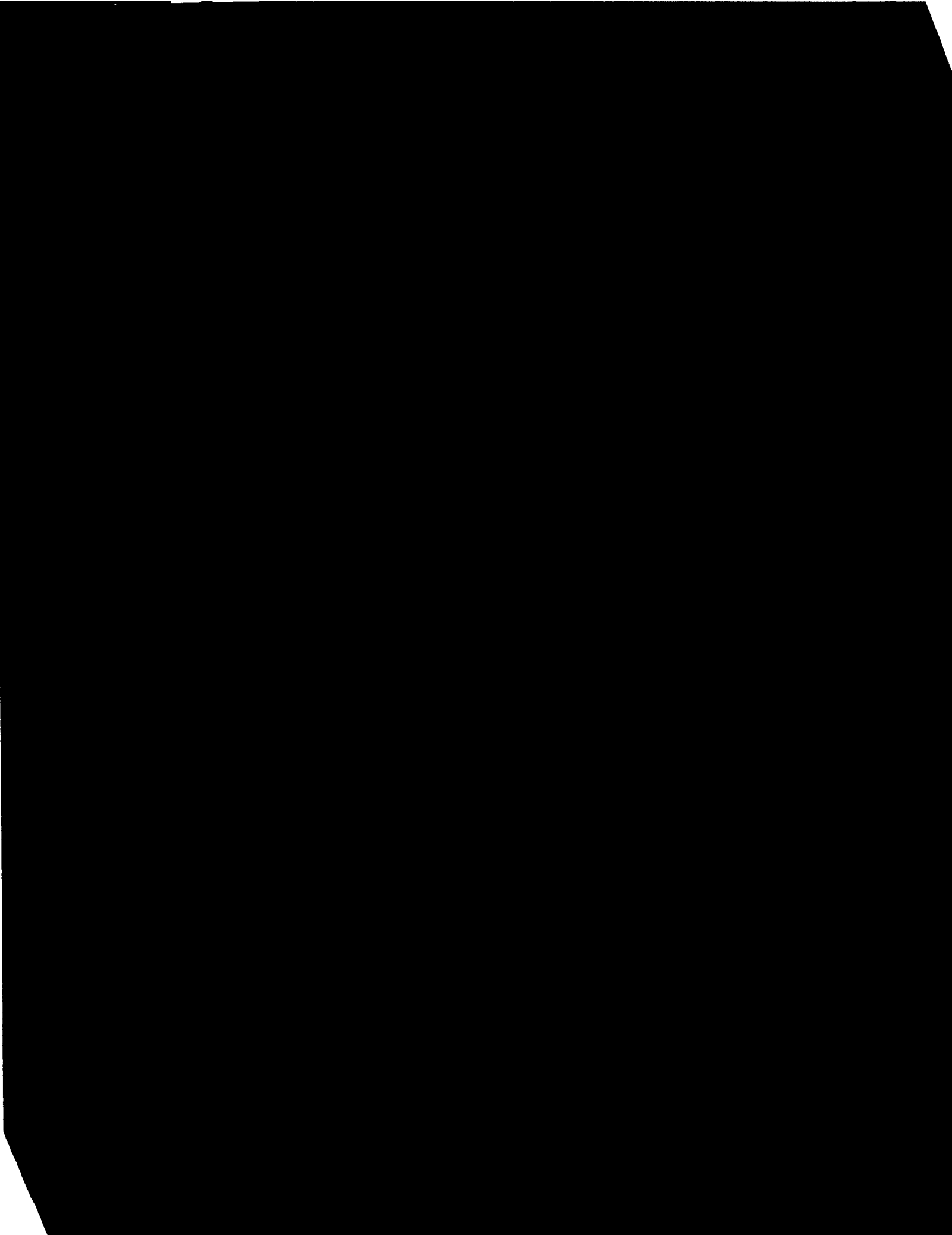




VERACOMPANY CORRESPONDENCE

(Rev. 48)

FROM:	Hugh Hudson	PLAINTIFF'S EXHIBIT RMC-27
TO:	MEMO TO FILE	
COPY:		
DATE & SUBJECT:	November 3, 1988	

REF: ASBESTOS COMPLAINT AND MSHA CITATIONS, PWR

On November 1, 1988 at about 3:15 p.m., I received a call from Ms. Patsy Tuttle, who stated that she was the Business Representative for a Millwright local in Corpus Christi. She said that some people working out of their local are presently working in our powerhouse and they were being required to work in a hazardous environment involving asbestos. She said that the men are working for General Electric (or Ada Construction, who is sub contracting for General Electric). Ms. Tuttle said that if we (Reynolds) didn't do something about it, she would. Ms. Tuttle was assured that we would check into the matter and someone would call her back (at 883-6226).

It was ascertained that the job the men are on is the overhaul on No. 2 Turbine Generator. The contractor is General Electric and the sub-contractor is Ada Construction. The G. E. Superintendent is Jim Gabaldon and the Ada Construction foreman is Carl White. Gene Melton is the Reynolds' Project Engineer

After receiving the information, I contacted Gene Melton, advised him of my conversation with Ms. Tuttle, and asked him about the job. He stated that the job had been shut down last week and the men had not been allowed to work in the area since the job was shut down. I gave Gene Ms. Tuttle's telephone number and asked him to call her and give her this information. I then advised E. W. Warner and Dave Riner of the complaint.

At about 8:30 a.m. on the following day (11/2/88), MSHA supervisor Alex Baca and MSHA Inspector Ed Lilly arrived at the plant. Alex stated that they were at the plant in response to a contractor employee complaint against Reynolds. He then referred to the turbine generator overhaul at the powerhouse. Dave Riner and E. W. Warner were advised of the MSHA Inspector's arrival and the nature of the call. Mr. Baca requested that Paul Bucy, #1316, be contacted and allowed to accompany an inspection team to the job site. Foreman Howard Cave, who is familiar with the job, was also called to the plant to make the inspection tour. Hugh Hudson, D. Harriman, Gene Melton, Earl Martin, and Gilbert Myatt were also in attendance when the job site was inspected by the MSHA inspectors. Hourly employee Tom Niewoehner, #2534, was also at the inspection site and talked with Alex Baca concerning the contractor employees working around the asbestos.

As best as could be determined, Niewoehner saw the insulation being knocked off of a pipe and valve by contractor employees working off a scaffold under No. 2 T.G. Niewoehner told the men that the insulation was probably asbestos and he then allegedly told the contractor foreman and Gene Melton. When he saw that nothing was being done to stop the men from working, he contacted Stan Millsap and Hector DeLaGarza. This reportedly occurred on Tuesday, October 25th. Immediately after he was notified, Hector went to the powerhouse and took samples from the valve and line in question. He then told Ken Romine to discontinue the work, shut off the fans being used by the contractor at the job site, and rope off the immediate area of concern. This was done and

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no one was allowed in the immediate vicinity of the torn insulation since that time. The job site remained status quo until Thursday, October 27th, when Howard Cave assigned a crew to encapsulate the valve and line with Certane 2050 and clean up the residue according to plant procedures.

At the time of the MSHA inspection, sample results had not been returned.. However the results were obtained by telephone prior to the MSHA inspectors leaving. The results were positive in both samples. The sample from the valve insulation showed 30 per cent Chrysotile and the sample from the line insulation showed 50 per cent Chrysotile asbestos.

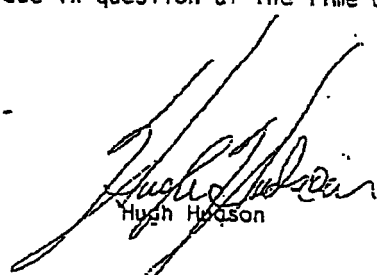
MSHA Inspector Ed Lilly issued two citations relating to this incident. Citation No. 3276347 states, " The Company failed to conduct a health survey on a work area at the powerhouse prior to starting work to determine the adequacy of control measures to be taken. Samples taken later were analyzed and showed 30% to 50% Chrysotile asbestos. " Also noted, " Samples were taken on 10-26-88 (should have been 10-25-88) and analyzed on 11-02-88."

Citation No. 3276348 states, " Employees were allowed to work in an area of the powerhouse without protective clothing or respirators while removing insulation hat was later found to contain 30% to 50% asbestos." Also noted, " Protective clothing and respirators were issued to persons working in area."

During the exit interview with D. Riner and D. Packebush present, Ed Lilly stated that the Sherwin Plant has an excellent procedure but the procedures were not followed. Proper removal of the insulation commenced during the time tt MSHA inspections were still in the plant and both citations were abated.

On Thursday November 3rd, Hector DeLaGarza and I returned to the job site. Hector talked with the men doing the clean-up and it was ascertained that the containers we have are not large enough to contain the insulation coming from the pipe and that which will eventually have to be removed from the belly of the turbine. It was decided that an asbestos removal contractor would be called in to complete the job prior to allowing the General Electric people to continue with the overhaul of the T.G.

Photos were taken of the pipe, valves and residue in question at the time of the inspection tour on November 2nd.


Hugh Hudson

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COMPARATIVE PRODUCTS TO ASBESTOS

Vendor's products that field tested to be equal to or better than asbestos products now in use are as listed below:

PRODUCT	NON-ASBESTOS RECOMMENDATION
Gasket Sheet, Pipe Gaskets, and Equipment Gaskets	Klingersil -- C-4400 Tenn-Val -- G.S. Garlock -- Blue Gard-Nitrile Rubber Binder Garlock -- Blue Gard-Styrene Butylone Rubber Binder SBR3100 Sepco -- No/ASB Style 6234
Gasket Sheet for Pot Insulation	Klingersil -- C-4400 Tenn-Val -- G.S. Garlock -- SBR3100 Blue Gard Sepco -- No/ASB 6234
Square Mechanical Packing General Service	Sepco -- ML 6402 Garlock -- 8909 Chesterson -- 1774
Boiler Feedwater Pumps	Sepco -- Grafoil Garlock -- Garfoil Chesterson -- Grafoil G.T.F. Diform
Pitch Pumps and North Plant Sump Pumps	Chesterson -- 370 Sepco -- 4460 Garlock -- 48
Anode Insulation Block	Brunswick Fabricators -- Non-Asbestos Monobestos Pyrotek -- N2 Johns-Mansville N/A Transite
Textured Fiberglass Cloth, Tubing, Tape, and Rope	Garlock -- Thermo-Sil Sepco -- Fiberglass Products
Millboard - Non-asbestos	Tenn-Val -- TV500NA Pyrotek -- U-1 Fiberseal CGR Products -- CGR 2150 Marionite -- XL Type C

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Comparative Products to Asbestos
Page Two

PRODUCT	NON-ASBESTOS RECOMMENDATION
Furnace Hoses, Carolina Hose, Tenn-Val	Caroflex EPDM Hose Reinforced with synthetic yarns, and covered with two braids of fiberglass.

TEMPERATURE LIMITS:

Fiberglass Untreated	1200°F
Fiberglass Rubber Impregnated	500°F
Glass Filled Teflon	500°F
Red Rubber	250°F
Neoprene	250°F
Ceramic Filled Teflon	500°F
Kevlar (Aramid Fiber)	500°F
Metallic Foil	450°F
Acrylic Fiber Board	700°F
Silicon Rubber	400°F
Ceramic Fiber	2300°F
Mineral Wool	1000°F
Graphite Fiber	2400°F
Carbon Fiber	1200°F
Calcium - Silicate Board	1200°F
Silicate - Fiber Board	1500°F
Flax	220°F
EPDM Rubber	350°F

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TX Tiner
RMC0003942

NON-ASBESTOS MILL BOARD

Construction	Non-Asbestos Fibers and Inert Binders
Density	60 lb/ft ³ approximately
Tensile Strength @ 500°C	150 psi
Flexural Strength	80 psi
Compression	30 percent
Thermal Conductivity @ 400°C	1.20 BTU in/ft/#
Heat Resistance	1500°F
Electrically Non-Conductive	

NON-ASBESTOS CLOTH, TAPE, TUBING, ROPE, SPECIAL GASKETS, AND PACKINGS

Construction	Woven Fiberglass 1/16" thick
Temperature Limits:	
Untreated	1000°F/538°C
Treated	500°F/260°C
Pressure (treated)	500 psi

SQUARE BRAIDED PACKINGS

General Service Packing:

For general service on rotary pumps and valves. To be non-asbestos synthetic fibers impregnated with graphite, speeds to 3,600 rpm/1,885 fpm, temperatures to 500°F/260°C, pH 3-11.

Boiler Feedwater Pumps:

Preformed graphite foil laminated packing rings, 3/8" square for 1-3/4" O.D. sleeve, speed 3,600 rpm, temperatures to 500°F/260°C.

North Plant Sump Pumps and Pitch Pumps:

Carbon-graphite fibers, pH 1-14, 2,000 fpm, temperatures 650°F/345°C.

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TX TINER
RMC0003943

COMPRESSED NON-ASBESTOS SHEET GASKET

Electrically non-conductive

MAX. OPERATING CONDITIONS	Temperature Pressure	400°C (750°F) 100 Bar (1450 psi)
COMPRESSIBILITY RECOVERY	ASTM F36A ASTM F36A	7%-17% Min. 50%
HOT COMPRESSION TEST Thickness decrease 23°C (73°F) Thickness decrease 300°C (572°F)		10% 8%
TENSILE STRENGTH ASTM F152 across grain		15 Bar (2200 psi)
CHANGE IN TENSILE STRENGTH ASTM F152 after immersion in ASTM-Oil 3, 5h 150°C (300°F)		-25%
WT. INCREASE ASTM F146 after immersion in Fuel B 5h 23°C (73°F)		Max. 15%
THICKNESS INCREASE ASTM F146 after immersion in ASTM Oil 1 5h 150°C (300°F) ASTM Oil 3 5h 150°C (300°F) ASTM Fuel A 5h 23°C (73°F) ASTM Fuel B 5h 23°C (73°F)		0-5% 0-5% 0-5% 0-5%
SEALABILITY ASTM F37 (0.8mm material) (1/32)		.6 ML/hour
SPECIFIC GRAVITY		1.5
STANDARD SHEET THICKNESS		1/32-1/16 3/32-1/8
SHEET SIZE		60 x 60
COLOR		Off-White

All data are typical values and refer to a sheet thickness of 1.6mm (1/16"), UNLESS OTHERWISE NOTED.

TX Tiner
RMC0003944

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DATA SHEET
NON-ASBESTOS MONOLITHIC

Density, lbs/ft. ³	110 (nominal)
Modulus of Rupture, psi	2,000 (nominal)
Water Absorption (48 hrs. @ R.T.) Weight increase, %	17 (nominal)

The following data is for information purposes only, and is not required for specification compliance.

TYPICAL DATA

Brinell Hardness (500 kg/10 mm/30 sec.)	15 (nominal)
Thermal Conductivity, K $\left\{ \frac{\text{BTU/In.}}{\text{hr-ft.}} - ^\circ\text{F.} \right\}$	
(70° F.)	2.17
(400° F.)	7.20
Modulus of Elasticity, psi X 10 ⁵	1.76
Maximum Service Temperature	800° F.

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