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July 21, 1993

VIA TELECOPIER

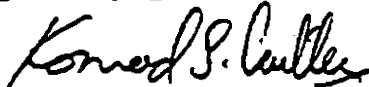
Paul E. Merrell, Esq.
Bradley & Merrell
c/o Jones, Jones, Close
& Brown, Chartered
700 Bank of America Plaza
300 South Fourth Street, Suite 700
Las Vegas, Nevada 89101-6026

Re: Nevada Power/Monsanto reading

Dear Paul:

Attached please find pages 192, 193, 197 and 198 from Mr.
Bickerstaff's April 23, 1992 deposition.

Very truly yours,



Konrad L. Cailteux

KLC:ap
Attachments

Bickerstaff - direct

192

1 A. No. What would happen was
2 there would just be a charge from budget
3 to budget so that somebody from
4 Bloomfield we'll say attending a course
5 would just fill out the form and put his
6 budget number down.

7 Q. And then the Bloomfield plant
8 would be billed by industrial hygiene?

9 A. Yes, correct.

10 Q. Was there any requirements
11 concerning attendance at these courses?

12 A. There wasn't a requirement, it
13 was highly recommended that they attend.

14 Q. And who was it recommended
15 would attend?

16 A. The manager of industrial
17 hygiene and safety, work and human
18 resources that they reported to.

19 Q. Were these courses offered on
20 an annual basis?

21 A. Some of them were, other ones
22 were maybe offered just as a special,
23 maybe on radiation. It might not be
24 offered again for another three years.

25 Q. Were any of the courses

Bickerstaff - direct

193

1 offered on anything more frequent than
2 an annual basis?

3 A. I can't remember anymore
4 frequent than annual.

5 Q. The second page of the
6 document is "engineering and hazard
7 evaluation for materials used in
8 manufacturing." The course description,
9 which is the third paragraph on the left
10 margin states that the course will
11 describe the organization of the
12 Corporate Standards Department, their
13 Westinghouse contacts and the purpose
14 and function of their basic material
15 parts and service codes. Was that
16 another department, the Corporate
17 Standards Department within corporate
18 headquarters?

19 A. That was a department that was
20 physically located at the science and
21 technology center, corporate standards.
22 I believe they reported to the science
23 and technology center, which in turn
24 reported to the headquarters.

25 Q. Now, was this a course that

Bickerstaff - direct

197

1 your corporate division.

2 A. Correct.

3 Q. And then the question of
4 whether or not the subjects discussed at
5 the meeting made it to the corporate
6 level would remain at the plant level in
7 the first instance and then if it
8 reached a division level would remain at
9 the division level?

10 A. It would.

11 Q. Were there any processes or
12 procedures that you were aware of where
13 the information would pass directly to
14 corporate?

15 A. No.

16 MR. COHEN: Let us mark as
17 Exhibit 18 a one-page document bearing
18 Bates stamp number 003 105836.

19 (Memo dated 10/25/74 is
20 marked as Exhibit Bickerstaff 18 for
21 Identification.)

22 Q. Sir, this document, have you
23 ever seen it before with the exception
24 of preparing for your deposition?

25 A. No, I haven't.

Bickerstaff - direct

198

1 Q. The document reflects three
2 reports of mercury vapor levels in an
3 area of the Bloomfield plant in excess
4 of permitted levels, and states that the
5 higher than permitted mercury vapor
6 level would be viewed by the Bureau of
7 Engineering and Safety as evidence of
8 our inability to control employee
9 exposure. We will be re-cited, given
10 time to get in compliance and possibly
11 fined.

12 Was the Bureau of Engineering
13 and Safety part of Westinghouse or
14 something external to Westinghouse?

15 A. I think it says New Jersey
16 Department of Labor, Bureau of --

17 Q. Up above. Perhaps you're
18 correct.

19 A. Here in New Jersey the
20 Department of Labor --

21 Q. In the first paragraph?

22 A. Yes.

23 Q. Fine. The second paragraph
24 from which I read with regard to the
25 Bureau of Engineering, there is the

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DATE: July 21, 1993 PREPARED BY: A. Pavenick

CLIENT/MATTER NAME: 30758 0100
CLIENT/MATTER NUMBER: Westinghouse/Nevada Power

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