456-17

PLAINTIFF'S EXHIBIT WRG-368



GRACE

Construction Products Division

TO: R. M. Vining

DATE: June 14, 1983

FROM: H. C. Duecker

SUBJECT: Draft Report to the USCPSC by Advisory Panel on Asbestos (June 1, 1983)

CC: R. C. Walsh

I have read through the subject report and it is my impression that the panel has done a very good job of summarizing the literature on the subject. Areas of uncertainty are discussed along with the general conclusions that are more certain. These are given in the first six pages of the report.

Unfortunately, the subject area is so vast and the range of technology so broad that I don't believe it is possible for anyone to give a good critique of the document in less than a week or two devoted entirely to the subject.

Section II, part J, on dose-response relationships should be evaluated in some detail by an expert such as Dr. McDonald to see how our Libby data compares with existing data.

Section II, part G, discusses implantation experiments similar to those done for us by Dr. Smith. The results of Smith's study on Libby tremolite would not alter the conclusions of this section.

Section I, part B, is, in my opinion, misleading and we should recommend some changes to make this part less conjectural and consistent with the rest of the report. Specifically, I object to the use of the following weasel words.

"...is not expected"...	in paragraph 3
"...may be more likely..."	in paragraph 4
"...seems to leach more..."	in paragraph 6
"...there is probably more surface..."	in paragraph 6
"...would probably dissolve more easily..."	in paragraph 6

Without these changes, one is left with the impression that chrysotile may not be as much of a problem as amphiboles. There is no clear evidence to support this notion that I am aware of.

Other recipients of the draft report are more qualified than I am to comment on the medical and toxicological issues. The dose response section, for example, is highly technical and may require a specialist.

H. C. Duecker

HCD/ph