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MESSAGE FROM XEROX 7024: (702) 385-1655

DATE: 7/21/93.

TO: David E. Schalk, Esq.
c/o Hilton Hotel

FAX #: (412) 594-5161

PHONE #: (412) 391-4600

FROM: Bradley & Merrell

CLIENT/MATTER: Nevada Power v. Monsanto

CLIENT/MATTER NO.: 11927.2

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TRANSMISSION REPORT

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No.	REMOTE STATION	START TIME	DURATION	#PAGES	MODE	RESULTS
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MB : SEND TO MAILBOX PG : POLLING A REMOTE MP : MULTI-POLLING RM : RECEIVE TO MEMORY

Bickerstaff - direct

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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

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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

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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.

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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