LAW OFFICES
STEPHEN A. SHELLER & ASSOCIATES
A PROFESSIONAL CORPORATION
1515 LOCUST STREET
6TH FLOOR
PHILADELPHIA, PA. 19102-3792
(215) 546-5510

STEPHEN A SHELLER*
BRUCE M. LUDWIG
JOSEPH A. PRIM, JR
GEORGE I BADEY III**
ROBERT A SLOAN**
LINDA S BATTISTINI***
JOSEPH D DINOTO**

DOUGLAS LINN II
ZANITA A. ZACKS-GABRIEL
OF COUNSEL

*ALSO MEMBER D C BAR
**ALSO MEMBER N J BAR
***ALSO MEMBER CALIF BAR

RECEIVED
MAY 22 1987
LABOR RELATIONS

A42-7

402 WEST 6TH STREET
ERIE, PA. 16507

PLAINTIFF'S EXHIBIT
WH-901
PENGAD-Bayonne, N.J.

May 20, 1987

Stuart Saltman, Esquire
Westinghouse Electric Corporation
Westinhouse Building
Gateway Center
Pittsburgh, PA 15222

Re: Westinghouse Electric Corporation - Lester Plant

Dear Mr. Saltman:

I am in receipt of your letter of May 12, 1987.

I want to thank you for responding in detail to some of the concerns we have had.

I do have a couple of questions, however, with respect to the contents of your letter and the information you provided to me. First, as you know, we are particularly concerned with requests for information on the employment records of former Lester site employees and their medical records. Your letter does not specifically address whether these items are disclose-able. Rather, you refer to written policies of Westinghouse. While noting that they were attached to your letter, they were not. Therefore, would you kindly provide me with copies of those policies or explanation as to whether employment records are discloseable and whether all medical records, including x-ray reports and the x-ray films themselves are discloseable.

Secondly, you will recall, the Union had requested information on asbestos products used by Westinghouse over the years, employee exposure to asbestos, and the health effects of that exposure on the employees. In your letter of May 12, 1987, you said you forwarded to me copies of asbestos related information already provided to this law firm last year. In the material you forwarded to me, there was some miscellaneous documentation, some of which concerned the unfair labor practice charge pending with the NLRB involving the "spin box".

Therefore, I am not sure whether I got all of the information you were intending to provide me. Let me indicate to you what I received that concerns asbestos exposure.

1. Miscellaneous memos concerning Union requests for information in 1982 - these memos apparently are internal memos and do not actually provide any specific information on asbestos, asbestos exposure or air sampling.

2. A package labelled as "Air Sampling - Monitoring - Box 1 MUB 21" - this contained regulations, guidelines and outlines concerning air monitoring; there are only three air sample records contained in this package.

3. There is another package which begins with a document entitled "Atmospheric Monitoring for Employee Safety", attached to it is a 1976 letter concerning an air sample for "harmful vapors". Then there is a grievance filed by Westinghouse Salaried Employees' Association in 1976.

4. A report entitled "Industry Hygiene Audit Report on Power Generation Division" date August 31, 1983 prepared by Diane Whittier - this is apparently a report done in 1983 to evaluate the Lester facility's industry hygiene program.

5. There is a set of unanswered interrogatories in a case Blazo v. Westinghouse, a New Jersey workers' compensation case.

6. There is the contents of a file entitled "SA-Asbestos Air Sampling Lab Analysis - Box 1, MWB 18.

I would like to make sure that this is all of the information that Westinghouse has concerning asbestos, asbestos exposure, asbestos products at the Lester plant. In this regard if Westinghouse has in its possession copies of any studies or reports by OSHA, we would appreciate them as well. For example, we understand that OSHA did an air sampling study in 1980 or 1981. In addition, while we talked about this briefly on the phone, you were going to check to see whether Westinghouse had done any studies itself of the health effects of asbestos

exposure on employees at its Lester site. I would appreciate your reviewing this matter once again to let me know whether I have everything.

Should you have any questions concerning this letter, please feel free to contact me.

Sincerely yours,

BRUCE M. LUDWIG

BML/kl

cc: Russell Senkow