PLAINTIFF'S EXHIBIT
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B&R-370

19271/cjb

Cause No. 31506

SHIRLEY HODGE,	§	**IN THE DISTRICT COURT OF**
as Personal Representative of the	§	
Estate of A. J. HODGE, JR., Deceased,	§	
	§	
v.	§	
	§	
TEXAS UTILITIES COMPANY; TEXAS	§	
UTILITIES ELECTRIC COMPANY (d/b/a	§	
VALLEY POWER PLANT); TEXAS	§	**FANNIN COUNTY, TEXAS**
UTILITIES GENERATING COMPANY, INC.	§	
and TEXAS POWER & LIGHT COMPANY,	§	
INC.; CSR, LTD.; BROWN & ROOT USA,	§	
INC.; BROWN & ROOT, INC.	§	
(A DELAWARE CORPORATION), and as	§	
successor to BROWN & ROOT, INC.	§	
(A TEXAS CORPORATION), individually	§	
and as successor to BROWN & ROOT, INC.	§	**6TH JUDICIAL DISTRICT**

DEFENDANTS' SUPPLEMENTAL ANSWERS TO PLAINTIFF'S INTERROGATORIES AND REQUESTS FOR PRODUCTION PROPOUNDED TO DEFENDANTS

TO: Plaintiff, by and through her attorneys of record, C. Andrew Waters, Law Offices of C. Andrew Waters, 400 Zang Blvd., Suite 1420, Dallas, Texas 75208 and Todd Kale, SILBER, PEARLMAN & BRUEGGER, SPB Building, 3110 Webb Ave., Dallas, Texas 75205

COME NOW Defendants Brown & Root, Inc. and Brown & Root USA Inc., per their agreement with Plaintiff to resolve issues related to discovery without the necessity of court intervention, and supplement earlier discovery responses. Only those responses which require supplementation are affected. The further responses are based on Plaintiff's agreement to reduce the scope and breadth of her inquiries. Where no supplementation is present, the original answer or response remains the same and should be considered set forth herein in full. Supplementation does not waive prior objections and privilege assertions. Investigation and discovery is on-going and further supplementation will be made as additional documents or information are located.

INTERROGATORY NO. 3:

As agreed, Defendants state that at various times since the advent of OSHA they have issued or used caution statement or signs. Attached are representative signs or statements which were used at various times.

Interrogatory No. 4:

None.

INTERROGATORY NO. 5:

The individual who acted in a medical advisory capacity to Defendants is Robert Conte, M.D., c/o Brown & Root, Houston, Texas

The individuals who have served as industrial hygienists for Defendants are Carl Richardson, Steve Sellers, Ralph Craig, Lynley Harris, Brian McCulloch, Dale Drysdale, and Delbert Gaines. Defendants are locating addresses for these persons. Messrs. Drysdale and Gaines still work for Brown & Root.

INTERROGATORY NO. 6:

Defendants may have such materials but it will be necessary for Plaintiff to review the volumes contained in the corporate industrial hygiene library to verify this. Attached is a current list of publications found in such library.

INTERROGATORY NO. 7:

Defendants' safety departments, at some time, were members of the following organizations: Associated General Contractors, Texas Safety Association, National Safety Council, and Association of Builders and Contractors. If any publication from these organizations in our possession exists, it will be listed in the document attached to the answer to Interrogatory No. 6.

INTERROGATORY NOS. 8 and 14:

Defendants have produced all existing documents except photographs which relate to the construction activities on Units 2 and 3 at Valley Power.

INTERROGATORY NOS. 10, 11 and 12:

Although Defendants do not possess the medical expertise necessary to answer subpart A, they understand that under certain circumstances -- none of which appear to exist in this case -- inhalation of certain types of asbestos fibers, if significant in intensity and duration, can cause the disease of asbestosis. Defendants first began to hear of the possible relationship between certain asbestos exposure and asbestosis some time after the OSHA regulations became effective. Since then Defendants also have heard allegations that asbestos exposure might also be linked to the diseases of lung cancer and mesothelioma, but the scientific evidence is not clear on this.

INTERROGATORY NO. 13:

None known.

INTERROGATORY NOS. 15 and 18:

As of October 31, 1977, Defendants, acting through its employees or outside firms, would visit construction sites to make or test dust level counts. Defendants cannot state with certainty where or when the air sampling was done except as reflected in the documents produced in response to Request for Production Nos. 21 and 22. Defendants believe that other monitoring took place and that records were to be kept at the jobsites. Unfortunately, no documents exist other than what has been produced because of the document retention policy in effect at that time. Plaintiff must made inquiry of the industrial hygienists listed in answer to Interrogatory No. 5 to learn the details regarding the dates, purposes and results of these procedures. In addition to tests done by Defendants, the premises owners conducted their own air monitoring for their employees and the employees of Defendants and their subcontractors. Defendants were not given copies of those test results.

INTERROGATORY NO. 17:

Defendants' predecessors began operations in the 1920's. Although Defendants cannot state when safety departments were formally organized, safety has always been a corporate concern. No records have been located going back beyond 1963, nor can anyone with knowledge of the safety department before the 1960's be located. Defendants have located a document which reflects the philosophy, duties and responsibilities of the safety department once it was formally established. A copy of this document is attached.

INTERROGATORY NO. 19:

1. A. John Pendergrass, C.I.H., C.S.P, P.E.
100 N. Washington Street
Falls Church, VA 22046

B. Toxicology, engineering and industrial hygiene generally and particularly as they relate to alleged asbestos fiber exposure under different conditions, including the facts of this case.

C. The witness may testify concerning regulatory requirements for the health and safety of workers exposed to asbestos, including the EPA and OSHA requirements pertaining to the handling of asbestos. He may be asked to testify concerning the actions of Brown & Root and others similarly situated under the same or similar circumstances existing at all times material herein. The witness may testify concerning the potential hazards of different types of asbestos, when such hazards were known or knowable by different segments of trade and industry, and the diseases associated with different types of asbestos exposures and when such associations were known or knowable by different segments of trade and industry. The witness may also be asked to testify concerning the actions taken by and state of knowledge of the utility industry during the time

Respectfully submitted,

FANNING HARPER & MARTINSON
A Professional Corporation

By: _____

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been mailed, telecopied or hand delivered to all attorneys of record, in compliance with Rule 21a. of the Texas Rules of Civil Procedure, on this the 30th day of August, 1996.

_____
PHILLIP S. BROWN