

ANSWER:

See Answer to Interrogatory 27.

29. Please state if any medical officer or industrial hygienist or medical consultant ever made at any time any recommendations and/or suggestions to Defendant pertaining to the risks or hazards to persons involved in the manufacture or use of asbestos products and, if so, please state when, by whom or to whom such recommendations and/or suggestions were made and the substance of each recommendation.

ANSWER:

Westinghouse incorporates by reference its Preliminary Statement and General Objections. Westinghouse objects to and cannot answer this Interrogatory in the categorical manner in which it is phrased. Without waiving its objections, Westinghouse states that it has learned that mere exposure to asbestos, without more, does not constitute a health hazard. Westinghouse generally has learned that inhalation of certain types and quantities of asbestos fibers over certain periods of time is associated with increased risks of health hazards for some people. The specifics of exactly how or when Westinghouse personnel acquired such knowledge or awareness is not certain. It is probable that it came from reading government publications or other public written materials.

Westinghouse's Industrial Hygiene Department would have been the most likely source of documents containing such information, if any. Westinghouse opposes unfocused production of documents from this department. However, Westinghouse will make available, in response to specific requests related to the specific issues in this case, relevant documents collected from its Industrial Hygiene Department.

30. Please state the scientific and/or medical periodicals to which Defendant, its medical department, research department, industrial hygiene divisions, engineering department or consulting physicians subscribed between 1945 to 1975.

ANSWER: