

# PROCESS SAFETY AND LOSS PREVENTION AUDIT

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A=Dow Rule or Regulation  
B=Good Practice/Training  
C=Hazard Analysis

## VII. AUDIT QUESTIONS AND ANALYSIS

### Operating Discipline

**REFERENCE:** Operating Discipline Standard for The Operating Units of Dow U.S.A.

- A 1. Yes ☐ No ☒ Have you filled out the plant self-evaluation forms to assess your plants progress on Operating Discipline?

Please provide these forms at the audit meeting.

|              |                                  |
|--------------|----------------------------------|
| Section II   | Process Technology Documentation |
| Section V    | Process Risk Management          |
| Section VI   | Operating Procedures             |
| Section VII  | Process Control                  |
| Section VIII | Operational Reliability          |
| Section IX   | Dynamic Process Information      |
| Section XII  | Industrial Hygiene               |

Plans: Complete by end of 1993 (self-evaluation).

- A/B 2. Who has primary responsibility for the plant's Operating Discipline?  
Shift supervisor and safety coordinator.

- A/B 3. How is the written portion of the Operating Discipline program maintained? (Have this available at the audit meeting.)  
It is located on the Vax and we are in the process of setting up a program to review at least annually.

- A 4. Process Safety Information (OSHA 1910.119, Paragraph d)(Review the Operating Discipline Self-Evaluation on Process Technology Documentation, Process Risk Management, Industrial Hygiene.)

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- a. Is information included pertaining to the hazards of the chemicals used or produced by the process, and does the information include at least:

| YES | NO |                                                                                                |
|-----|----|------------------------------------------------------------------------------------------------|
| X   |    | • Toxicity Information                                                                         |
| X   |    | • PEL's                                                                                        |
| X   |    | • Physical Data                                                                                |
| X   |    | • Reactivity Data                                                                              |
| X   |    | • Corrosivity Data                                                                             |
| X   |    | • Thermal and Chemical Stability Data                                                          |
| X   |    | • Hazardous effects of inadvertent mixing of different materials that could foreseeably occur? |

NOTE: MSDS's meeting the requirements of 29 CFR 1910.1200(g) may be used to the extent they contain the information required.

- b. Is information included concerning the technology of the process, and does it include at least:

| YES | NO |                                                            |
|-----|----|------------------------------------------------------------|
| X   |    | • A block flow diagram or simplified process flow diagram? |
| X   |    | • Process Chemistry?                                       |
| X   |    | • Maximum intended inventory?                              |
| X   |    | • Safe Upper and Lower Limits?                             |
| X   |    | • An evaluation of the consequences of deviations?         |

(If the original technical information no longer exists, it may be developed in conjunction with the PHA.)

- c. Is information included pertaining to equipment in the process, and does it include at least:

| YES | NO |                                                                       |
|-----|----|-----------------------------------------------------------------------|
| X   |    | • Materials of Construction?                                          |
| X   |    | • Piping and Instrument Diagrams (P&ID's)?                            |
| X   |    | • Electrical Classification?                                          |
| X   |    | • Relief System Design and Design Basis?                              |
| X   |    | • Ventilation System Design?                                          |
| X   |    | • Design Codes and Standards Employed?                                |
| X   |    | • Material & Energy Balances for Processes Built after 05/26/92?      |
| X   |    | • Safety Systems (e.g., interlocks, detection or suppression systems) |

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- A 5. Operating Procedures (OSHA 1910.119, Paragraph f) (Refer to Operating Discipline Self-Evaluation on Operating Procedures)

Yes ☒ No ☐ Do written operating procedures exist for each covered process? Do the procedures provide clear instructions for conducting activities safely?

Do the operating instructions address, as a minimum, steps for each operating phase, including?

| YES | NO |                                                                  |
|-----|----|------------------------------------------------------------------|
| X   |    | • Initial Start-up?                                              |
| X   |    | • Normal Operations?                                             |
|     | X  | • Temporary Operations?                                          |
| X   |    | • Emergency Shut Downs?                                          |
| X   |    | • Conditions Requiring Emergency Shut Down?                      |
| X   |    | • Assignment of Shut Down Responsibility to Qualified Operators? |
| X   |    | • Emergency Operations?                                          |
| X   |    | • Normal Shut Down?                                              |
| X   |    | • Start-ups following a turnaround or emergency shut down?       |

Yes ☒ No ☐ Are operating procedures readily accessible to employees who work in or maintain a process?

Yes ☒ No ☐ Are operating procedures reviewed as often as necessary to assure that they reflect current operating practice?

- A/B 6. Yes ☐ No ☒ Does the plant have a training process to keep people current on Operating Discipline?

Plans: In the process of setting up a program for refresher training.

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09- Flammable Mix

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**Process Hazard Analysis**

Process Hazard Analysis (PHA) is required by the OSHA PSM Standard 1910.119, Paragraph e). This section of the Process Safety and Loss Prevention Audit along with the Reactive Chemicals Review, Chemical Exposure Index Review, Fire and Explosion Index, Hazardous Materials Transportation Review and others, constitutes Process Hazard Analysis for existing Dow facilities.

**FLAMMABLE MIXTURES/COMBUSTIBLE DUSTS**

- C 1. Yes ☐ No ☒ Are flammable/combustible materials stored in your plant?
- C 2. Yes ☒ No ☐ Are flammables loaded/unloaded in your plant?  
Vehicular Fuel only
- A 3. Yes ☒ No ☐ Partly ☐ Are flammable materials processed in open, freely ventilated structures? (LPP 2.1.2.)  
Plans: \_\_\_\_\_
- B 4. How do you prevent flammable mixtures in the vapor space of process tanks, storage tanks, rail cars, tank trucks, etc.? (LPP 10.2)  
Cells and tailgas are monitored for H<sub>2</sub>/Cl<sub>2</sub> explosive mixtures. Air and/or nitrogen is used to control concentrations in safe ranges.  
Plans: \_\_\_\_\_
- C 5. Yes ☒ No ☐ In process equipment operating under vacuum conditions, has the hazard of air introduction been evaluated?  
(Example: Packing leaks on vacuum pumps, vacuum conditions resulting from temperature change associated with shutdowns, normal low pressure operations, etc.)  
Plans: \_\_\_\_\_
- B 6. Yes ☒ No ☐ Do you monitor system pressure and/or oxygen content in low positive pressure applications?  
Plans: Oxygen analyzers are present in our Hydrogen Processing Trains

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- C 7. Yes ☐ No ☒ a. Do you have a flare system?  
Yes ☐ No ☒ b. Do you have a TOX, THROX?

If yes to either of the above, how do you prevent backflashes in the system? \_\_\_\_\_

Yes ☐ No ☐ NA ☒ Are temperature sensors utilized in conjunction with flame/detonation arrestors?

Plans: \_\_\_\_\_

How do you avoid flammable mixture within the header? (LPP 14.2.7) Not applicable.

Yes ☐ No ☐ NA ☒ Is your flare tip on a maintenance schedule?

How do you insure that you have a flame? NA

- C 8. Yes ☐ No ☒ Does the plant/process have potential combustible dust flammability concerns? (LPP 11.1)  
If yes, answer the following questions:

Yes ☐ No ☐ NA ☒ Have reactive chemical tests been run on the possible dust mixtures?

Yes ☐ No ☐ NA ☒ Does the plant have static electricity guidelines and programs? (LPP 3.6)

Yes ☐ No ☐ NA ☒ Are regular electrical continuity checks made for solids handling systems? (LPP 11.1.3)

Yes ☐ No ☐ NA ☒ Are there plant procedures and action taken to prevent an accumulation of dust to build on structural beams, surface of equipment, etc.?

Yes ☐ No ☐ NA ☒ Where dusts exist, have alternate methods of handling or isolation been considered?

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**Process Hazard Analysis**

**FACILITY SITING - DRAINAGE**

REFERENCES: LPP 2.4, LPP 7.6.3.

- B 1. Yes ☐ No ☒ NA ☐ If one or more fire protection systems are activated, will flooding occur in the process area?  
If so, where? \_\_\_\_\_  
Details: Chlorine has a deluge gun for hydrogen stack fires & sprinkler system in the C-52/62 area.
- B 2. Yes ☒ No ☐ Can trenches, ditches, sewers, etc., back-up into the plant?  
If so, where? East/West trench (C-40's) at Chlorine and in the Cathode wash area at Cell Service.  
Plans: Installation of a new outfall trench (construction starts in 12/93) will address flooding in the C-40's area. No plans for the Cathode wash area.
- B 3. Yes ☐ No ☒ Would a fire in trenches, ditches, sewers, etc. expose the plant?  
If so, refer to LPP 2.4.4. for cover recommendations.  
Details: Hydrogen trenches are covered with grating and a constant water flow is maintained
- A 4. Yes ☒ No ☐ Are all sewers trapped to prevent vapor backup?  
Plans: Cell Effluent Hydrogen Traps. Nitrogen padded cell effluent sump.
- A 5. Yes ☐ No ☐ NA ☒ Are tanks containing liquid with flash points less than 140°F diked or impounded? (LPP 7.6)  
Plans: \_\_\_\_\_
- A 6. Yes ☒ No ☐ Don't Know ☐ Are diked walls liquid-tight? (LPP 7.6)  
Yes ☒ No ☐ Are they tested?  
Details: During rains the diked areas fill with rain water and must be drained periodically
- A 7. Yes ☒ No ☐ Are tanks located far enough from dike walls so that a leak will not spray over the wall. (LPP 7.6.2.)  
Details: Chlorine Storage spheres.  
Plans: No plans in near future.

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- A 8. Yes ☒ No ☐ Is area drainage generally directed away from the process equipment?  
Rate your drainage system:  
Excellent ☐ Fair ☒ Adequate but Needs Improvement ☐  
Plans: East/West Trench Upgrade. Closed Loop cooling (Wet Comp.). Elimination of RW/freon condensers.
- B 9. Yes ☒ No ☐ Are drainage areas including ditches clean and free of obstruction/debris? (LPP 7.6)
- B 10. Yes ☒ No ☐ Does your plant have secondary containment?  
Yes ☒ No ☐ If so, are there written procedures covering operation, especially during emergencies?  
Details: Plant is surrounded by the crown of the road which circles the block. Both facilities have SPC and SPCC plans.
- A 11. Yes ☒ No ☐ Do you have a written plan for handling spilled materials?  
Details: SPC and SPCC plans developed for both Chlorine and Cell Service. Plant Library contains information on the proper handling of material used or manufactured in the plant

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## Process Hazard Analysis

### WAREHOUSE STORAGE

Warehouse - An attached or detached building for storage of raw materials, finished products or maintenance items or equipment.

REFERENCES: Minimum Requirement, LPP 12.4.

- C 1. Yes ☒ No ☐ Not Required ☐ Are warehouse areas protected with fire protection or detection systems?  
Plans: Fire Extinguishers only.  
What is the warehouse inspection practice?  
Visual inspections by operations, staff, and material controller.
- C 2. Yes ☐ No ☒ Are pallets stored within the warehouse? (LPP 12.4.3)  
Plans: \_\_\_\_\_
- B 3. Yes ☒ No ☐ Are empty pallet stacks less than eight (8) feet in height? (LPP 12.4.3.)  
Plans: \_\_\_\_\_
- B 4. NA ☒ Where does sprinkler and fire fighting water drain? (LPP 12.4.4)  
Plant drainage system.  
Plans: \_\_\_\_\_
- C 5. Diesel Powered ☒ Gasoline Powered ☒ LPG Powered ☐  
List types of fork trucks. Chlorine: (1) Clark, (2) Yale - both gas-powered. Cell Service: (1) 6000lb Clark (gas), (2) 1200lb Clark, (1) 10,000lb Clark, (1) 30,000lb Taylor - all diesel.
- C 6. Where is fuel storage for the fork truck located? (LPP 12.4.5) There is no storage for fork truck fuel at either facility..  
Plans: \_\_\_\_\_
- C 7. Yes ☐ No ☒ Are flammable or combustible liquids dispensed or drummed in the warehouse area? (LPP 12.4.5)  
Plans: All flammable materials are stored in a flammable locker which is labeled as such.

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1 - Equip/Relay Risk Time

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**Process Hazard Analysis**

**EQUIPMENT/BUILDING LOCATIONS AND FIRE RISK**

**REFERENCES:** Minimum Requirements, LPP 2.2. and 12.2.

- A 1. Yes ☐ No ☒ Do buildings and process structures meet the minimum separation distances as calculated by the F&EI (LPP 2.2?)  
Cl2 plant has one conflict - Building #2603.  
Yes ☒ No ☐ If minimum distance is not met, is the area protected?  
Plans for areas of concern: \_\_\_\_\_
- A 2. Yes ☒ No ☐ Has the construction for occupied buildings in high hazard plants been evaluated per LPP 12.2?  
Yes ☐ No ☒ Are there significant areas of concern?  
Plans: \_\_\_\_\_
- B 3. Yes ☒ No ☐ Are buildings of non-combustible construction?  
Yes ☒ No ☐ Are temporary buildings (trailers) located to avoid exposing other critical facilities?  
Plans: Cl2: Category A buildings  
Cell Service: Category "0" buildings
- B 4. Describe your building's air supply system. Review monitoring and emergency procedures regarding flammable and/or toxic releases. (LPP 12.1) Cl2 control room: Remotely located blowers provide fresh air flow. Air tightness of control room has been improved by better sealing of the building. Air dampers have been replaced and the bottled air supply system has been improved.  
Yes ☒ No ☐ Can the air supply be shut down in an emergency?  
Yes ☒ No ☐ Do you monitor the air intake for flammable/toxic material?  
Plans: Cl2 monitors on intake of air blowers to alarm against use during spill conditions.
- A 5. Yes ☒ No ☐ Are penetrations of fire walls properly protected? (LPP 3.5.6)  
Plans: Dow Corning Fire Stop is used.
- A 6. Yes ☐ No ☒ Are fire doors inspected periodically and fusible link systems tested for closing (LPP 10.13)?

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Plans: No fire doors in Cl2 or Cell Service

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Sheltering Ch ck Sheet for Building 2601

Date : \_\_\_\_\_ Time : \_\_\_\_\_ Name : \_\_\_\_\_

1. [ ]Yes[ ]No Lab Blower door has been closed and unit shutdown if possible. You can shutdown unit with switch locate on the right side of hood in the lab. (Palmer, Hood)
2. [ ]Yes[ ]No Air conditioner/heater unit AC-26-1 has been shutdown. Location is on the wall in the main hall next to men rest room. (Daigle, Smith)
3. [ ]Yes[ ]No Air conditioner/heater unit AC-26-2 has been shutdown. Location is in the change house next to air conditioner unit. (Daigle, Heins)
4. [ ]Yes[ ]No Air conditioner/heater unit AC-26-3 has been shutdown. Location is on the south wall in the conference room. (Himel, Jones)
5. [ ]Yes[ ]No Air conditioner/heater unit AC-26-4 has been shutdown. Location is in the west wall next to the outside door of lab. (Palmer, Hood)
6. [ ]Yes[ ]No Announce not to turn on air conditioner units or lab hood. (Creel, Hood)
7. [ ]Yes[ ]No Assemble all the people in building 2601 in the hallway by secretary office. (Creel, Hood)
8. [ ]Yes[ ]No Obtain emergency radio located in printer/mail room and establish communication with Safe Permit Writer and Contr 1 Room. (Use Instrument Channel to communicate with Safe Work Permit Writer) (Creel, Hood)
9. [ ]Yes[ ]No Outside door to Lab has been secured and checked for leaks. (Palmer, Hood)
10. [ ]Yes[ ]No Outside door of change house on west side secured and checked for leaks. (Heins, Daigle)
11. [ ]Yes[ ]No Outside door of change house on south side secured and checked for leaks. (Heins, Daigle)
12. [ ]Yes[ ]No Outside door leading out of Conference room taped, secured, and checked for leaks. (Haney, Hull)
13. [ ]Yes[ ]No Outside door next to Secretary's office taped, secured and checked for leaks. (Haney, Hull)
14. [ ]Yes[ ]No Building 2601 outside door on north side taped, secured, and checked for leaks. (Palmer, Hood)
15. [ ]Yes[ ]No Communicate to Safe Work Permit Writer (if on duty or Shift Supervisor if Safe Work Permit Writer is not on Duty) the name of people who are sheltering in Bldg. 2601 and contractor's company name. (Creel, Hood)
16. [ ]Yes[ ]No Communicate to Safe Work Permit Writer (if on duty or Shift Supervisor if Safe Work Permit Writer is not on Duty) the people name and company that have sign into block but have not signed out. (Creel, Hood)
17. [ ]Yes[ ]No After all clear has been announced has building been return to normal. (Do rs open, Air Conditioner Units back in service, etc.) (Everybody)

"OVER"

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13 - Human Factors

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**Process Hazard Analysis**

**HUMAN FACTORS**

(Technical systems and equipment designed so they can be used safely and efficiently by humans.)

- A 1. Yes ☒ No ☐ During a Process Hazard Analysis (i.e.; Project Review, Management of Change Review), are human factors considered? (For Example: "What if the operator adds material B instead of material A?")  
Plans: \_\_\_\_\_
- B 2. Yes ☒ No ☐ Is adequate information about process conditions (normal and upset) displayed in the control room?  
Plans: Process Information and area perimeter analyzer information is available
- B 3. Yes ☒ No ☐ Are the displays visible from all normal areas in the control room?  
Plans: \_\_\_\_\_
- B 4. Yes ☒ No ☐ Are automatic safety features provided to cope with a process upset when either a rapid response or complex information process is required?  
Plans: Load reduction and automated process trips are handled through integrated inst. systems. Upcoming wet compressor Mod5 conversion project will greatly enhance existing features.
- B 5. Yes ☐ No ☒ Must any instrument, display, or control be disabled or bypassed manually during any phase of the operation?  
Plans: Note: This is really only true for maintenance work on critical instrumentation, valves, etc.
- B 6. Yes ☒ No ☐ Are alarm set points and process computer software protected from unauthorized change?  
How: Alarm setpoint changes require supervisor's approval and process computer software changes require computer manager's approval. Management of Change forms and Mod5 code change forms required for setpoint and software changes.
- B 7. Yes ☐ No ☒ Are critical inputs to the process control computer protected from incorrect entries?  
Plans: Mod5 control program development is in progress for critical

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systems in the plant. Protection against incorrect entries will be included. Currently, critical entries require an observer to validate entry.

- B 8. Yes ☒ No ☐ Are there unnecessary nuisance alarms?  
Plans: GPI vax tool is used to track alarms on Mod5 systems.  
The tool is being used to help reduce nuisance alarms.
- B 9. Yes ☒ No ☐ Is all equipment (vessels, pipes, valves, instruments, controls, etc.) clearly and unambiguously labeled in the field?  
Plans: Note: Piping is not labeled inside this plant.
- B 10. Yes ☒ No ☐ Do shifts communicate the process status (batch conditions, process abnormalities, equipment out of service, active work permits, etc.) to each other?  
How: Shift relief, log books, and operational notes.
- B 11. Yes ☒ No ☐ Are checklists used for critical procedures?  
Plans: In progress. New checklists are being generated for critical procedures. These procedures are located on a single computer system and are available to those authorized for access.
- B 12. Yes ☒ No ☐ Do the people developing and reviewing procedures analyze the job for hazards and identify the hazards in the procedure?  
Plans: Procedures are developed by operating teams consisting of 2 or more members. These folks are familiar with procedure scopes and have developed extensive procedure requirements
- B 13. Yes ☒ No ☐ Are operating personnel able to read and understand process control programs?  
Plans: Note: There is definitely room for improvement here both from an understanding point of view and also from using consistent programming techniques to avoid confusion
- B 14. Yes ☒ No ☐ Are operating personnel trained in using the process information computer?  
Plans: Through hands on training and tailgate sessions.  
Documentation for process information is available.

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**Process Hazard Analysis**

**HAZOP**

- C 1. Yes ☐ No ☒ Do any of your unit operations have an F&EI of 159 or higher or a C.E.I. of 299 or higher, or meet the criteria for conducting a HAZOP as outlined in the Process Risk Management Guidelines for Facilities and Distribution?

Plans: \_\_\_\_\_

- B 2. Where a HAZOP Review has been performed (please list areas studied), what is the status of the recommendations from the HAZOP study?

| Process | Process Unit |
|---------|--------------|
|         |              |
|         |              |

**ADDITIONAL RISK EVALUATION**

- C 1. Yes ☐ No ☒ Has any additional risk evaluation or quantitative risk assessment been done in your facilities?

Plans: \_\_\_\_\_

- B 2. Where an additional risk evaluation has been done, provide a summary of the results and the status of recommendations.

\_\_\_\_\_

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1 - Elect

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**Mechanical Integrity**

**ELECTRICAL SYSTEMS**

**REFERENCES:** Minimum Requirements, National Electric Code, LPP 3.1

- A 1. Yes ☒ No ☐ Is the electrical area classification plot plan up-to-date?  
(LPP 3.1)  
Last Reviewed Date: 2/92 for Chlorine. Cell Service is not classified.  
Plans: \_\_\_\_\_
- B 2. Yes ☐ No ☒ Are there any instances where the electrical installation  
is in conflict with the electrical classification plot  
plan?  
Plans: \_\_\_\_\_
- B 3. Yes ☒ No ☐ For Classified Areas: Are electrical enclosures  
properly assembled; i.e., all doors closed, bolts in  
place and tight, conduit seals in place and intact?  
(National Electric Code) (LPP 3.40)  
Plans: \_\_\_\_\_
- B 4. Does your plant have:  
Yes ☒ No ☐ \*Redundant Electrical Power Supply?  
Yes ☒ No ☐ \*Redundant Feeds? (Chlorine only)  
Yes ☐ No ☒ Diesel Generated Power Backup?  
Plans: \_\_\_\_\_  
\*Some plants have redundant feeds but single transformers.
- B 5. Yes ☒ No ☐ Is switch over automatic? (LPP 3.4)  
Last Date Exercised: 9/93 during lightning strike. Switch over was  
successful, with no loss of equipment.  
Plans: There is a UPS system for critical inst/elect control systems
- A 6. Yes ☐ No ☒ Are there major cable trays routed through  
flammable liquid areas where pooling resulting from  
spills can occur? (LPP 3.2.5)  
Plans: \_\_\_\_\_
- B 7. Yes ☐ No ☒ Do you have fire protection on any of your major cable  
trays, (i.e., water spray, drainage, routing, fire  
retardant materials)? (LPP 3.2.7)  
Explain: Not Applicable
- B 8. Yes ☒ No ☐ Considering possible unit fire exposures, are all cable  
wall penetrations appropriately sealed with approved  
fire stops? (Urethane is not an approved fire stop.)  
(LPP 3.2.6)

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Plans: Dow Corning Fire Stop product is used.

- B 9. Yes ☒ No ☐ Are grounds in place and tests up-to-date?

Last Test Date: Testing complete at CI2 - 9/93

Plans: \_\_\_\_\_

- B 10. Yes ☒ No ☐ Has your plant participated in an Electrical Audit?

Date of Last Audit: 9/93 for CI2. Cell Service audit scheduled for later this year.

Please review status of recommendations: The audit recommendations will not be published until 11/93.

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