PLAINTIFF'S EXHIBIT

UC-2325

ALTERNATE METHOD OF DETERMINING REQUIREMENTS

REPAIR NEEDS = INSULATION REMOVAL + INSULATION REPLACEMENT

INSULATION REMOVAL RATE = 11,786 MH/YR

* REPLACEMENT = (4)(11,786) = 47,144 MH/YR

REPAIR NEEDS = 58,930 MH/YR = 37 EQ PEOPLE

REPAIR NEEDS (ASSUME 10% OVERTIME) = 34 EQ PEOPLE

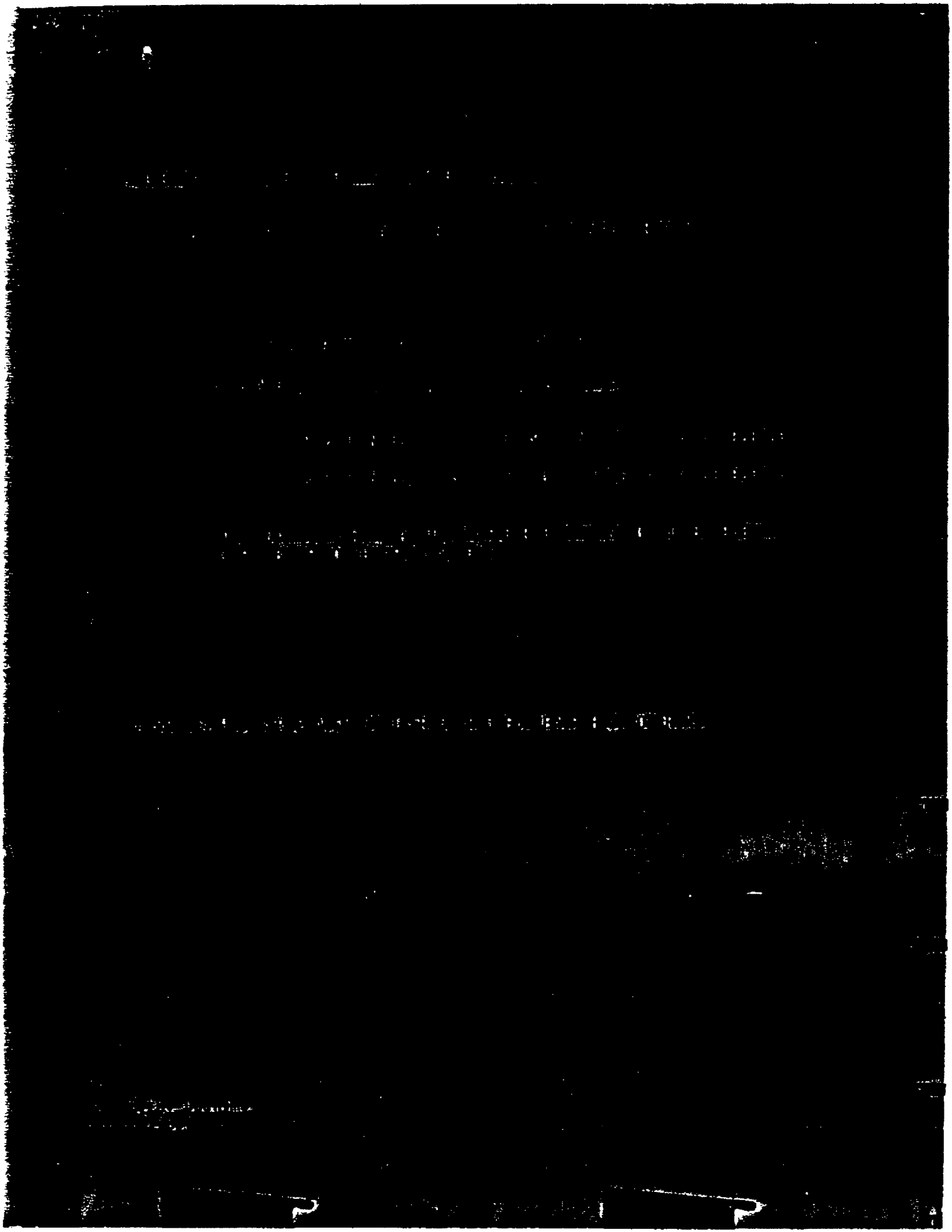
THIS COMPARES WITH AN INDICATED REQUIREMENT OF 36 EQ PEOPLE USING BASIS OF HISTORICAL DATA.

*ASSUME 4 HOURS REPLACEMENT IS REQUIRED FOR EACH HOUR OF REMOVAL.

J. R. Dean:mb
1/7/85



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| | |
|---|---|
| STAFFING REQUIREMENTS REPAIR WORK (Assumes 10% Overtime) | 36 INSULATORS |
| ASBESTOS REPAIR WORK (Assumes 10% Overtime) | 10 INSULATORS |
| TOTAL REQUIREMENTS | 46 INSULATORS |
| CURRENT STAFFING | 19 INSULATORS |
| SHORTAGES: | |
| REPAIR WORK | 17 INSULATORS |
| ASBESTOS REPAIR | 10 INSULATORS |

RECOMMENDATION FOR REPAIR WORK

1. BID 11 INSULATORS.
2. IMPROVE PRODUCTIVITY BY 17%.
3. MAINTAIN LONG RANGE STAFFING AT 30 INSULATORS.

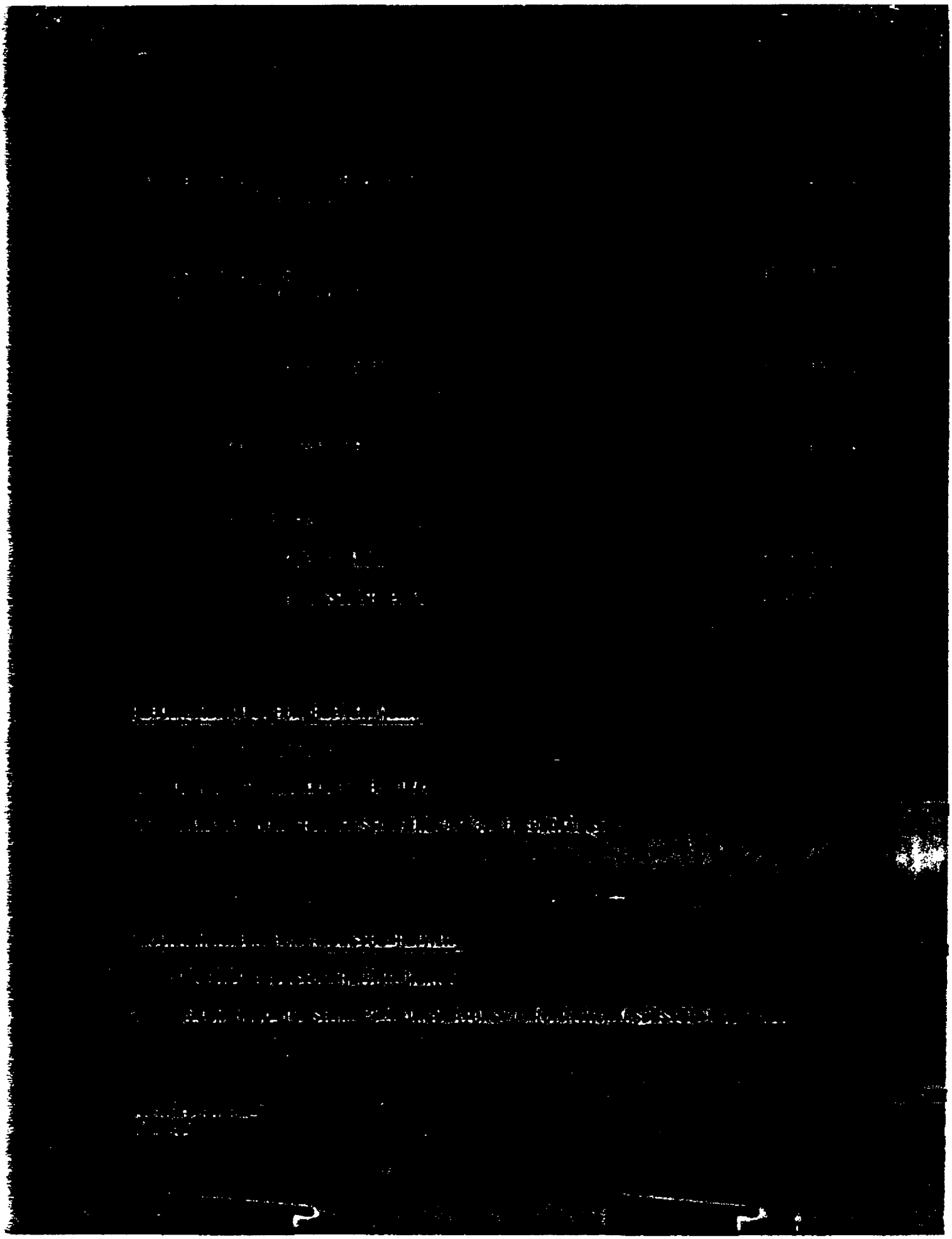
RECOMMENDATION FOR ASBESTOS REPAIR

1. CONTRACT ASBESTOS REPAIR WORK.
2. REVIEW NEED TO STAFF 2-4 INSULATORS TO MAINTAIN ASBESTOS MID 1986.

J. R. Dean:mb
1/7/85



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| Craft/Department | 1984 OT % | # People Assigned |
|---|---|---|
| SM | 3.47 | 7 |
| Security | 3.9 | 12 |
| Mtls Mgmnt | 4.8 | 25 |
| AM | 5.06 | 4 |
| EP | 5.3 | 2 |
| Polyols | 5.5 | 27 |
| SI | 6.05 | 13 |
| MA | 6.73 | 12 |
| IM | 6.90 | 43 |
| Fire Prot | 7.5 | 10 |
| Energy | 8.1 | 31 |
| Mainland | 8.1 | 17 |
| Util Mech | 8.8 | 5 |
| Specialty | 9.2 | 26 |
| MW | 9.43 | 45 |
| TD | 9.68 | 23 |
| SB | 10.89 | 83 |
| UICC | 11.8 | 24 |
| LAB | 12.0 | 14 |
| Mixing | 12.6 | 7 |
| Oxide | 13.4 | 15 |
| EO | 13.95 | 10 |
| EL | 14.13 | 43 |
| SVR/PVA | 14.4 | 46 |
| LR | 15.6 | 32 |
| Distrib | 16.2 | 83 |
| Silicones | 16.3 | 29 |
| CA | 16.78 | 16 |
| RI | 17.78 | 32 |
| WE | 18.35 | 14 |
| PF | 18.45 | 58 |
| PA | 20.76 | 5 |
| IR | 24.79 | 19 |
| BM | 29.51 | 3 |



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