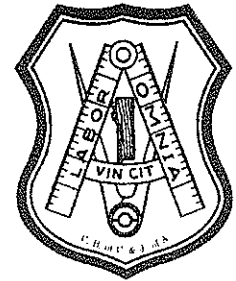


**WHARF, DOCK BUILDERS AND PILE DRIVERS,
HOUSE MOVERS, UNDERPINNING, SHORING & CAISSONS
LOCAL UNION No. 454**

UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA

1803 SPRING GARDEN ST., PHILA., PA 19130
(215) 569-1632 FAX (215) 569-2595

MEETS THIRD FRIDAY



DENNIS SZUMSKI
Business Representative

JAMES BOYLE, JR.
President

DAVID RONCINSKE
Recording Secretary

JOHN P. McANENY
Financial Secretary

SAMUEL C. CHAMBERLAIN, III
Treasurer

January 28, 2011

Captain R. C. Proctor
Commandant (CG522)
United States Coast Guard
2100 Second Street SW - Stop 7126
Washington, DC 20593-7126

RE: Docket ID USCG 1998-3786

Dear Captain Proctor:

Please be informed that Wharf and Dock Builders, Pile Drivers & Divers Local Union No. 454, affiliated with the United Brotherhood of Carpenters and Joiners of America, is hereby requesting the opportunity to participate in the process by which the rules governing commercial diving operations are revised and or modified in any way. This request is being made as any changes, or lack there of, to the existing rules that govern the way in which commercial diving operations are conducted have a direct-physical impact on the lives and livelihoods of our Members, who work in the hazardous field of commercial diving.

Our goal is to see that any changes to the definitions and rules that govern commercial diving operations provide for the safety of the entire dive team in a clear and concise way, and not where a rule can be left open to interpretation. Unfortunately, today the definitions and rules by which commercial diving operations are conducted allow for open interpretation of said rules. This leads to situations where there are insufficient personnel available for emergency assistance to any in-water diver in need. The presence of equipment that is not suitable for commercial diving operations, and poorly defined standards that do not adequately determine a dive team, what a standby diver is, what a tender is, and what a dive supervisor is, and what qualifies each of them as such.

Since 1998 at least 273 commercial divers operating in waters under the jurisdiction of the U.S. Coast Guard have been killed and or injured in preventable accidents due to the lack of clear, concise, non-negotiable, safety guidelines. Individuals have been killed because their primary air supplied failed due to mechanical error, with no functioning back-up system. Divers have died because they were working with unqualified personnel without the necessary skills, knowledge, equipment, and/or ability to perform the appropriate rescue operations. Divers have been killed because they have been sent to perform tasks that the employer knows are hazardous to their health, in advance of the dive, such as burning in confined spaces, because it is cheaper than using a mechanical alternative. These are the

practices that our members and contractors would like to see come to an end before another commercial diver is killed in pursuit of making a living under the water.

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Tragically every year commercial divers are killed in preventable accidents because the laws and regulations intended to protect such workers are so riddled with loop holes that in effect there are no rules. In addition the individuals charged with enforcing these rules, and regulations, always seem to fall short in their duties, or lack any real authority to actually do something to remedy the problem. In this climate of pseudo rules and regulations companies, corporations, and/or contractors have determined that the preventable loss of life is a cost that is not worth caring about. Once and for all, we ask that those who have the authority to improve the existing commercial diving regulations do so, and make the obvious changes that will protect the commercial diver in the water. All too often this issue is revisited over and over because another diver has been killed for the same reason as the last diver killed in action. Our Government continues to allow the commercial diving industry to self-regulate at the divers expense. When will this end? When will the Coast Guard act to protect working commercial divers? How many more working divers have to die before anything meaningful is done? When will the Coast Guard implement its own recommendations resulting from the Cliffs Drilling Rig No.12 casualty investigation?

If the Coast Guard needs an example of a fully functional industrial safety program that effectively protects workers while maximizing production, then examine the Nuclear Power Industry. No one performing work in any Nuclear Power Plant operates without a clear, pre-job plan, a clearly defined command chain, the proper functioning tools, and if something is amiss, the project is shutdown regardless of the project priority. This has led to a working environment where in which no preventable accidents occur, period. The key word being "preventable". The accidents that do occur in the Nuclear Power Industry are just that, accidental they are unfortunate anomalies, not the product of willful negligence. Why are these two industries different in how they approach safety? I will tell you why, because the Nuclear Power Industry is forced to adhere to real safety laws, or face the consequences. Where as the commercial diving industry is left to its own devices..... resulting in the terrible safety environment where fatalities and injuries are expected.... not prevented.

Listed below are sixteen "proposed" rule changes that would greatly benefit all commercial divers:

1. Adopt all the recommendation that were developed as a result of the Coast Guards own investigation into the commercial diving accident aboard the mobile offshore drilling unit Cliffs drilling rig NO.12 on March 4th 1996 with the loss of life.
2. All dive teams will be composed of five (5) certified commercial divers regardless of depth or conditions. Dive team by position should include 1.) Dive supervisor, 2.) Working Diver, 3.) Tender, 4.) Standby Diver, and most importantly, 5.) A

Tender to tend the in-water Standby Diver in the event of an emergency. Every additional in-water diver must be assigned their own top side tender.

Captain R. C. Proctor

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3. There will be no consolidation of dive team positions to reduce the number of qualified personnel that makes up a dive team.
4. The designated tender will only provide support to the in-water diver.
5. The use of a bail out bottle, and or diver carried emergency reserve breathing gas is required on all commercial diving operations regardless of depth.
6. All diver related back- up air systems must be sufficient in size and capacity to support both the in-water diver in need, and any standby divers necessary to recover a diver in need.
7. Every dive team in pursuit of commercial diving operations must have a standby diving system on site that is fully functional, and assembled ready for operation, regardless of depth of the dive.
8. All Dive team members must be certified through an accredited commercial diving school. Non-certified personnel should not be permitted to work in any capacity on a commercial dive team.
9. All dive supervisors must be qualified by a third party independent organization which tests candidates knowledge on all aspects of commercial diving operations, such as, but not limited to, dive tables, decompression sickness and treatment, rigging, crane signals and operations, the operation, maintenance, repair, and inspection of all diving related support equipment, industry best practices, and all safety rules and regulations pertaining to commercial diving operations.
10. No group or agency that represents diving contractors, and or anyone who employs commercial divers in any capacity, shall be considered qualified in any way to certify any individual as a diving supervisor.
11. The Coast Guard should over see and license Diving Supervisors based on the aforementioned criteria. If qualified Diving Supervisors had to get a license from the Coast Guard, and this license could be revoked for safety infractions, like that of a vessel operator, then Dive Supervisors would be much more likely to adhere to the law and industry best practices, thereby greatly reducing preventable diver related accidents.
12. Superintendents, and or employers are responsible for the adherence to all safety regulations pertaining to commercial diving operations, and as such will be held responsible both criminally and civilly, for knowingly or unknowingly acting in such a way that someone on a dive team is injured, and/or killed as a result of a dive supervisor's actions or inactions.

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13. All diving related equipment, including diving related tools must be certified as operational according to the relevant guidelines that pertains to such equipment, and the contractor and/or employer, must keep all records and make them available to anyone who requests such documents and or records.
14. Any air compressor utilized for diver supplied air must be capable of producing the sufficient amount of air required by both the diving helmet manufacturer, and the deepest portion of the dive.
15. All diving operations conducted in contaminated waters must utilize diving equipment that totally isolates the diver from exposure to any water borne contaminants while performing any commercial diving operations.
16. Scuba Divers/Scuba Diving, by definition, will not be considered acceptable in any capacity as a means of performing commercial diving operations.

See attached documents pertaining to Cliffs Twelve investigation and the following recommendations. I have also included a performance over view of work performed, and work to be performed in PSEG's Salem Hope Creek Power Generating station, this meeting took place January 26, 2011. Take special note of the production performance of the last shut down (114%) and the fact that were no serious injuries that occurred during this last outage. This is clear proof that real safety measures, and accountability, will actually lead to superior production and immediate cost savings.

Upon request, I can readily provide you with additional letters of support from our Members, who are commercial divers, and perform this work on a daily basis.

Thank you for your consideration of this very important matter. I look forward to discussing this matter with you and for your favorable reply.

Sincerely,



DAVID RONCINSKE
Organizer

U.S. Department
of Transportation
United States
Coast Guard



Commandant
United States Coast Guard

2100 Second Street, S.W.
Washington, DC 20583-0001
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16732/ MC00011781

MAR 15 2001

**COMMANDANT'S ACTION
ON THE FORMAL INVESTIGATION INTO THE
CIRCUMSTANCES SURROUNDING THE**

COMMERCIAL DIVING ACCIDENT

**ONBOARD THE MOBILE OFFSHORE DRILLING UNIT
CLIFF'S DRILLING RIG NO. 12 ON MARCH 4, 1996
WITH THE LOSS OF LIFE**

ACTION BY THE COMMANDANT

The report of the Investigation into the subject casualty has been reviewed. The investigative report, including the findings of fact, conclusions, and recommendations, is approved.

ACTION ON RECOMMENDATIONS

Recommendation #1: Commandant should require bailout bottles for all commercial diving operations, regardless of depth. The bailout bottles should have sufficient capacity to supply a diver with an appropriate volume of air at the deepest depth being worked. The facts of this case do not strongly support a recommendation for bailout bottles. Nevertheless, all diving experts consulted by the Investigating Officer agreed that bailout bottles come in so many sizes and configurations, and are so inexpensive that every dive should begin with the presumption that a bailout bottle will be used.

Recommendation #2: Commandant should require all unused auxiliary gas ports on diver worn life support equipment to be capped or blanked during all commercial diving operations. This will remove the possibility of water entering a diver's helmet if he inadvertently opens an emergency valve.

Recommendation #3: Commandant should require a standby diver dressed out and with a separate air supply, ready to quickly deploy for all commercial diving operations regardless of depth.

Recommendation #4: Commandant should require diving stages for all commercial diving operations regardless of depth, except where they would be impractical. This will speed entry to the water for divers and rescue divers and remove the need for rescue operations to work from personnel baskets. In this casualty, the rescue operation was itself so slow that using a crane operated Billy Pugh basket, as rescue platform did not significantly add to the delay. Nevertheless, there is no question that a diving stage at water level would have speeded up the rescue.

Recommendation #5: Commandant should require the Diving Supervisor and the Master or Person-in-Charge to develop a site-specific rescue plan designating the equipment and personnel that will be used for a rescue or removal of an injured diver from the water for all commercial diving operations.

Recommendation #6: Commandant should require that, prior to any commercial diving operation, the Diving Supervisor describe the rescue plan to all members of the diving team.

Recommendation #7: Commandant should require the Diving Supervisor to complete a Job Hazard Analysis before every commercial diving operation. See IO Exhibit 57, ADC Consensus Standards, pg. 3-9 to 3-10b.

Recommendation #8: Commandant should require Diving Supervisors to complete a pre-dive safety checklist suitable to the type of diving equipment and procedures to be used, prior to all commercial dive operations. See IO Exhibit 53, Navy Dive Manual, pg. 4-37 to 4-49.

Recommendation #9: Commandant should consider changing Coast Guard regulations to ensure accountability of commercial diving contractors for maintaining records and logs for their diving equipment. Commandant should also make minor changes to Coast Guard regulations in addition to those described above to ensure Offshore Installation Managers play a more active role in pre-dive safety preparations. Present Coast Guard diving regulations place record keeping responsibilities on diving supervisors. Diving supervisors are appointed on a job to job basis and their designation ends when the diving job they supervise ends. Many of the record keeping responsibilities, however, are continuous and must be completed between diving jobs, away from the dive site. The following recommended regulation changes illustrate how the commercial diving contractor and Offshore Installation Manager could be given a more responsible role in the record keeping and pre-dive safety processes.

- a) At 46 CFR 197.204 [Definitions], Commandant should add a definition "Commercial Diving Contractor" to describe the person or business that provides commercial diving services.
- b) At 46 CFR 197.484 (a) [Notice of casualty], after the words "person-in-charge", Commandant should include the words "Diving Supervisor or Commercial Diving Contractor."
- c) At 46 CFR 197.486 [Written report of casualty], after the words "person-in-charge of a vessel or facility" Commandant should include the words "or Diving Supervisor or Commercial Diving Contractor."
- d) Commandant should change 46 CFR 197.210 [Designation of diving Supervisor] as follows:

"The Commercial Diving Contractor shall designate in writing a Diving Supervisor for each commercial diving operation. The Diving Supervisor shall present the written designation to the Master or Person-in-Charge."

- e) Commandant should change 46 CFR 197.402 (2) (i) [Responsibilities of the person-in-charge] as follows:
- "Prior to permitting any commercial diving operation to commence, the Master or Person-in-charge shall examine the Diving Supervisor's written designation to ensure it is complete as required by Section 197.210."
- f) Commandant should cross-reference 46 CFR 109.109 [Responsibilities of master or person-in-charge] with 46 CFR 197.402 [Responsibilities of person-in-charge].
- g) Commandant should change 46 CFR 197.480(c) [Logbooks] as follows:
- (c) The Diving Contractor and the Diving Supervisor conducting commercial diving operations from a vessel or facility subject to this subpart shall maintain a logbook for making the entries required by this subpart.
- (d) The logbook required to be maintained by this subpart shall be taken to the jobsite for every commercial diving operation and shall be available for inspection by the Master or Person-in-charge, the United States Coast Guard or any other cognizant agency.
- (e) The Diving Contractor shall retain the logbook required to be maintained by this subpart for a period of not less than three years.
- h) Commandant should change 46 CFR 197.482 (d) [Logbook entries] as follows:
- (d) The Diving Contractor and the Diving Supervisor shall insure that a record of the following is maintained:...
- (e) The Diving Contractor and the Diving Supervisor shall insure copies of each of the records required under paragraph (d) are included in the operations manual required by 46 CFR 197.420. The records required under paragraph (d) must be maintained by the Diving Contractor for a period of not less than three years.
- i) At 46 CFR 197.420 [Operations manual], Commandant should add the following:
- (e) The operations manual must contain copies of the records required to be maintained by 46 CFR 197.482 (d) and (e).
- j) At 46 CFR 197.450 [Breathing gas tests], Commandant should change the words "The diving supervisor shall ensure that" – to
- "The Diving Contractor shall ensure that -
- k) At 46 CFR 197.450 [Breathing gas tests], Commandant should add the following:

(d) The Diving Contractor shall maintain the above stated test records for a period of not less than 3 years.

Recommendation #10: Commandant should require the Dive Supervisor and Master or Person-in-Charge to execute a Declaration of Inspection verifying their respective duties have been completed before any commercial dive operation begins. See 46 CFR 35.35-30 for an example of the concept as it is applied to oil transfers.

Recommendation #11: At 46 CFR 197.204 [Definitions], Commandant should include a definition of "Diving Tender." Commandant should consider adopting the description of Diver Tender set out in the Navy Dive Manual. See IO Exhibit 53, Part 4-8.5.3.

Recommendation #12: At 46 CFR 197.204 [Definitions], Commandant should include a definition of "Dive Tending" or Tending.

Recommendation #13: Commandant should consider limiting the duties of a dive tender to only tending the dive umbilical during a commercial diving operation, as illustrated by the following wording.

At 46 CFR 197.432(c) [Surface-supplied air diving], Commandant should add the words:

: the person tending the diver shall have no other duties while the diver is under water;

Recommendation #14: At 46 CFR 197.204 [Definitions], Commandant should consider consolidating the definitions "Commercial diver" and "Diver" into one inclusive definition.

Recommendation #15: Commandant should establish minimum manning standards for all diving operations. Commandant should consider adopting the standards set out in the ADC Consensus Standards. See IO Exhibit 57, pg. 3-24 to 3-29.

Recommendation #16: Commandant should establish commercial diving qualification standards for Commercial Divers, Commercial Diving Tenders, and Commercial Diving Supervisors. Commandant should consider adopting the standards set out in the ADC Consensus Standards. See IO Exhibit 57, pg. 2-3 to 2-8.

Recommendation #17: In the absence of a diver qualification program, Commandant should publish criteria for OCMI's to use when reviewing SEILOD (Special Examination in Lieu of Drydocking) applications to evaluate qualifications of divers to safely conduct diving operations.

Commandant's Action on Recommendations #1 through #17: We concur with the intent of these recommendations. We are currently conducting a technical review of the Commercial Diving Operation regulations at 46 CFR 197. Upon completion of the review, the changes recommended in recommendations 1 through 17, will be included in an upcoming Notice of Proposed Rulemaking (NPRM) to the extent that they are warranted, feasible, and allowed by existing legislative authority. If necessary, we also may seek additional legislative authority.

Recommendation #18: Commandant should examine NVIC 12-69 and NVIC 1-89 to determine whether the older one should be cancelled and incorporated into the newer.

Commandant's Action on Recommendation #18: We concur with the intent of this recommendation. Both documents are being examined in conjunction with the review of the current requirements for commercial diving operations. Once the regulatory update is complete, a determination on whether one or both NVICs should be cancelled or combined will be made and up-to-date policy guidance will be provided.

Recommendation #19: Commandant should require dive operation inspection training for all marine inspectors.

Commandant's Action on Recommendation #19: We concur with the intent of this recommendation. Training on commercial diving operations will better prepare our marine inspectors and investigators to prevent and respond to incidents involving this sector of the marine industry. A Commercial Diving Orientation Course curriculum has already been developed. This new course will be formally incorporated into the Marine Safety training program for marine inspectors and investigators.

Recommendation #20: Commandant should remove the diving component from the MODU Inspector PQS workbook and establish a separate Performance Qualification Standards workbook for diving operations.

Commandant's Action on Recommendation #20: We concur with this recommendation. A separate Performance Qualification Standards (PQS) workbook for commercial diving operations is being developed in conjunction with the recently completed Commercial Diving Orientation Course curriculum.

Recommendation #21: Commandant should evaluate the adequacy of the MODU/SEILOD (Mobile Offshore Drilling Unit/Special Examination in Lieu of Drydocking) job aid, CG-840H-1 (9-92), to determine whether additional inspection items should be added to the diving checklist (pg. 20-22). See IO Exhibit 31.

Commandant's Action on Recommendation #21: We concur with this recommendation. An evaluation of the MODU/SEILOD job aid, CG-840H-1, is currently underway. The job aid's adequacy is being evaluated in conjunction with the commercial diving orientation training curriculum and the development of a performance qualification standards workbook (PQS) for diving operations. Appropriate modifications will be made when the evaluation is completed.

Recommendation #22: Commandant should publish guidance emphasizing that Coast Guard marine inspectors should not attempt to delegate dive safety enforcement duties to any third party, including classification society surveyors.

Commandant's Action on Recommendation #22: We concur with the intent of this recommendation. All guidance associated with dive safety enforcement duties is currently being evaluated in conjunction with the technical review of the Commercial Diving Operation regulations. When the regulatory update is complete, appropriate policy guidance, including clear delineation as to what duties may and may not be delegated to third parties, will be provided.

Recommendation #23: Commandant should require dive casualty investigation training for all marine safety casualty investigators.

Commandant's Action on Recommendation #23: We concur with the intent of this recommendation. We agree that it would be desirable for marine safety casualty investigators to have formal dive casualty investigation training in the event they were called upon to do such an investigation. However, diving casualties accounted for less than 4% of the total Coast Guard casualty investigation workload from 1995 to 2000. Given the limited training resources available to the Coast Guard, this level of frequency does not warrant formal training of all casualty investigators in this area at this time. However, several initiatives have been undertaken to improve the knowledge level of investigators in this area, including the development of a Commercial Diving Orientation Course for marine inspectors and investigators. Regarding investigations specifically, this diving casualty investigation was included as a case study at the 2000 Senior Investigating Officers (SIO) Conference. The case study was also included on a CD-ROM given to each attendee at the conference to be used at their field units for reference and local training on this topic.

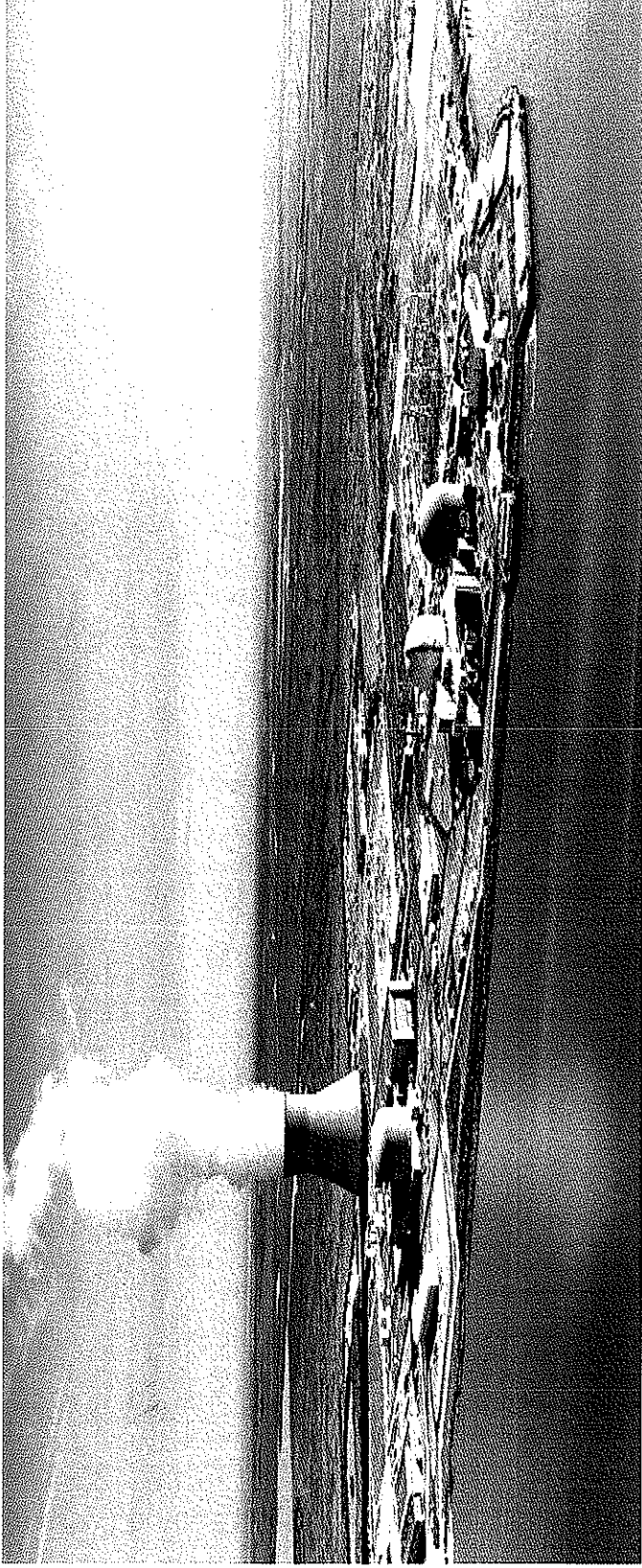
Recommendation #24: Commandant should consider tasking Coast Guard divers to assist in the investigation of diving casualties. In this case, the IO was assisted by a former Coast Guard diver and a U.S. Navy Master Diver, both with exceptional insight. However, previous investigators to this casualty did not have those valuable resources. The Marine Safety Manual recommends that an IO investigating diving casualties have diving experience, but there are few IO's available with that background.

Commandant's Action on Recommendation #24: We concur with the intent of this recommendation. The Officer in Charge, Marine Inspection (OCMI) has the authority to use Coast Guard divers or U.S. Navy Divers to assist in any type of Coast Guard casualty investigation. The Office of Investigations and Analysis will encourage the use of these resources and will provide updated guidance to investigating officers in the Marine Safety Manual.

Recommendation #25: Commandant should consider seeking an agreement with the Navy Experimental Diving Unit and the U.S. Navy Diving School to provide assistance in Coast Guard diving casualty investigations.

Commandant's Action on Recommendation #25: We concur with this recommendation. The Coast Guard currently has a liaison at the Navy Diving School who has provided assistance to the Coast Guard in the past on investigations and we will continue to use our liaison. The Office of Investigations and Analysis will discuss the need for a Memorandum of Undertaking (MOU) with the U.S. Navy Diving program. Additional guidance on diving investigations will be provided in the Marine Safety Manual.

Recommendation #26: Commandant should establish a working group of industry experts to examine ways to improve safety practices in the commercial diving industry. The working group should consider whether the Coast Guard should adopt by reference the ADC Consensus Standards for commercial diving operations where they do not conflict with Coast Guard



**SALEM/HOPE CREEK GENERATING
STATIONS
DZNPS/PSEG/ BUILDING TRADES
TRIPARTITE MEETING**

January 26, 2011

AGENDA

- *Introductions*
- *Safety*
- *Current Work and Resources*
- *Hope Creek HIR16 Review*
- *Preliminary Salem 2R18 Work Scope*
- *Preliminary 2R18 Craft Resources*
- *In Processing/Badging/Training*
- *Open Discussions and Closing Comments*

SAFETY

2010 Safety Performance

- *Over 257,307 Mhrs worked (including seconded)*
- *Zero (0) Lost Time Injuries*
- *Two (2) First-Aid*
- *Two (2) OSHA Recordable*
- *Three (3) Report Only's*

CURRENT RESOURCES (DZNP)

• Asbestos Workers	0
• Boilermakers	0
• Carpenters	6
• Cement Masons	0
• Electricians	21
• Ironworkers	0
• Laborers	6
• Millwrights	1
• Operating Engineers	0
• Painters	2
• Pipefitters	3
• Sheetmetal Workers	0
• Teamsters	0
TOTAL	39

CURRENT & UPCOMING WORK/PROJECTS (CONTINUED)

- *Pre-outage scaffold installation*
- *Pre-outage Temporary Power & Light installation*
- *Pre-outage Insulation removal/preps*
- *SW Capital valve replacement pre-fab*
- *Hope Creek SW Cable vault Modification*

Hope Creek HIR16 Outage Performance review (cont.)

- *A small piece of metal fell into the 3A Feed Water Heater.*
- *“B”RHR Heat Exchanger exceeded the dose estimate.*
- *Less than adequate work performance in some cases, will talk off line with applicable parties*
- *Less than adequate performance in meeting Housekeeping expectations*

PSEG/DZNPS 2R18 GOALS

- Goals
 - * *Zero OSHA/Lost Time Injuries*
 - * *0 Personnel Contaminations*
 - * *≤ 75% of established DZNPS Dose goal*
 - * *0 Human Performance Events*
 - * *> 90% Resource Utilization*
 - * *95% Schedule Compliance*
 - * *0 Rework issues*

SALEM S2R18 OUTAGE MAJOR WORK SCOPE (Continued)

- *RHR Cross Connection Header Vent Installation (PF)*
- *Misc. Painting and Coating (PA)*
- *Misc. Service Water & Circ Water Repairs (PF)*
- *#22 Charging Pump Replacement (PF, EL, MW)*
- *Outage Scaffold Support (Seconded) (CA, LA))*
- *Outage TP&L/Bulk Electrical Support (Seconded) (EL)*
- *Outage Insulation Support (AW)*
- *Containment Fan Cooling Unit (CFCU) Repairs (PF, PA)*
- *Containment Liner Repairs (IW,AW,PA)*

Inprocessing / Badging / Training

- *Access Changes:*
 - *Fingerprinting All Workers*
 - *Reinstates required to have Background Complete*
 - *Unemployment Background References*
 - *PSEG Access Comments – Ron Fisher/ Beth Watson*

Inprocessing / Badging / Training

cont.

- *Reminders*
 - *Workers need employment history for 3 years or since last access, unless an alcohol or drug offense then needs 5 yrs history*
 - *List all legal actions and bring paperwork with resolution*
- *Passport Information:*
 - *Issue & Expiration Dates*
 - *Countries Visited*

OPEN DISCUSSION & CLOSING COMMENTS

- *Craft resource availabilities/concerns*
- *Plan to continue with ORAL Board's for General Foreman & Foreman*
- *Misc*