

NORTHROP GRUMMAN
Newport News

Northrop Grumman Corporation
Newport News
4101 Washington Avenue
Newport News, VA 23607
Telephone 757 380-2000



September 16, 2002

Docket Office
Docket No. S-030
U. S. Department of Labor, OSHA
200 Constitution Avenue, NW, Room N-2625
Washington, D.C. 20210

OSHA
DOCKET OFFICER

DATE SEP 16 2002

Dear Docket Officer:

S-030
EX. 2-40

Northrop Grumman Newport News appreciates the opportunity to respond to your request for comments and nominations for membership on the Negotiated Rulemaking Committee for *Safety Standards for Cranes and Derricks*.

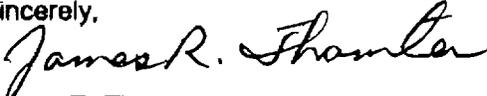
Northrop Grumman Newport News employs approximately 18,000 employees and is the nation's largest shipyard and largest private employer in the Commonwealth of Virginia. Northrop Grumman Newport News is an OSHA Voluntary Protection Program site at the Star Level. Established in 1886, the Company occupies approximately 500 acres and 2½ miles of waterfront on the James River in Newport News, VA.

Newport News has a fleet of over 600 cranes, ranging from 1-ton pendant controlled overhead hoists to a 900-ton Goliath gantry crane. Our fleet includes mobile hydraulic cranes, portal cranes, gantry cranes, and various other types. We have approximately 1800 trained and qualified operators, cranes riggers, and supervisors and make over 1 million lifts annually. Although our operations are primarily regulated under the Maritime Industry standards (29 CFR 1915), we also perform work covered under the construction industry standards (29 CFR 1926). We believe that our operations could be significantly affected by the outcome of the negotiated rulemaking due to our operations that are currently covered by Construction Industry standards and the potential for future incorporation of similar changes into the Maritime Industry standards. Therefore, we are requesting representation on the Committee.

We would like to nominate Thomas W. Chamberlain, P.E. for membership on the Negotiated Rulemaking Committee. Mr. Chamberlain is a professional engineer who received his degree in electrical engineering from Michigan Technological University. He has over 20 years of experience in industry, including his current position as Manager, Crane Engineering and Quality. In his current position, he manages a staff of 75 crane engineers and inspectors and oversees engineering services to the Northrop Grumman Newport News crane fleet.

If selected for participation on the committee, we will participate in good faith in development of the rule. For further information, please contact me at (757) 380-4651 or Thresa Nelson at (757) 688-5523.

Sincerely,


James R. Thornton
Director, Environmental, Health & Safety

Cc:

Tom Chamberlain
Thresa Nelson