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FEB 23 2005

Comments on Draft EE/CA for the 224-B Facility

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EDMC

December 15, 2003

The rationale for considering only cleanup and demolition to slab grade is not obvious. A complete decontamination and decommissioning activity would include removal of those underground pipelines connecting the 224-B building with other associated buildings in the area and/or with the waste storage tank system, and those portions of the facility that are contaminated and below-grade, as well as removal of contaminated soils below grade. The mention of the Canyon Disposition Initiative implies that presumably those below-grade residuals would be taken care of when the 221-B facility was dispositioned, but no specifics from the CDI were provided and no references for the CDI were provided. Thus, the reader can not review just what was being considered under the CDI to see if the limitations imposed on this EE/CA are reasonable. In general, without additional information, the appropriateness of the cleanup and demolition activities proposed in this draft EE/CA cannot be reasonably evaluated.

The building description would much better serve the reader if the following information were included: 1) a plan view of the facility; 2) a vertical section view of the south side of the facility, showing those portions that are below-grade; and 3) the drawing showing the 221-B and the 224-B buildings included lines indicating the locations and numbers of underground contaminated pipelines connecting those and any adjacent related facilities.

Related to the previous comment: there is no indication how the plutonium solutions were delivered from 221-B to 224-B. If underground pipelines were used, it would be necessary to develop an estimate of the inventory of residual plutonium contained in those pipelines, in order to determine whether cleanout or removal was necessary. Just capping/grouting the pipelines a few feet from the building slab without that information seem highly inappropriate. Similar concerns arise for any waste removal pipelines leading to cribs or tank storage.

It is not clear just what is meant by "stabilizing" the location after the structure is brought down to slab grade. Does this mean installing a long-lived cap over the slab and its surrounding land area? If so, say so. If not, say what exactly you plan to do to "stabilize" the location. Will the "stabilization" interfere with or preclude any future additional cleanup work?

Grouting the below-grade locations in the facility in Alternative 3 seems unwise unless the eventual final disposition of the slab includes a permanent long-term environmental cap. If eventual removal of all of the below-grade portions of the facility are contemplated for the final end-state of the facility, the grouted portions could present some significant problems during the final site decontamination efforts.

The cost analyses do not include the time schedule for accomplishing the various activities proposed under Alternatives 3 and 4, while Alternative 2 is suggested to last about 30 years. The present value costs are not meaningful without knowing when in the future the various expenditures are made. The small differences between the undiscounted and the discounted costs for Alternatives 3 and 4 suggest that those alternatives were to be performed in the next year or so. One has to assume that the reason for not completing the decontamination and decommissioning of the 224-B facility is based on doing the underground cleanup activities when the adjacent 221-B facility is decommissioned. Because presumably the 221-B activity will not take place for some years yet, one could show that the present values of the Alternative 3 or 4 activities become quite small if they were postponed for 30 years or so. Thus, there would be a financial incentive to postpone the Alternative 3 or 4 activities for 30 years. Of course, with the DOE funding arrangements, present value analysis has no real meaning since there is no money to deposit and earn interest over the delay period.