

Comment on the Engineering Evaluation/Cost Analysis for the 224-B Plutonium Concentration Facility:

The B Plant laydown yard is located south of the 221-B building in the 200E Area of the Hanford Site, and within the CERCLA onsite area defined in the 224-B Building Air Monitoring Plan and Waste Management Plan. The laydown yard contains abandoned radiologically contaminated materials and equipment, as well as approximately 24 mobile offices, miscellaneous trailers and structures (referred to below as 'materials and equipment'). I believe those items meeting the waste acceptance criteria for the Environmental Restoration Disposal Facility (ERDF) should be disposed in conjunction with the 224-B building removal action.

In order to facilitate disposition of the laydown yard materials and equipment, I believe that the 224-B Action Memorandum should be expanded to include removal of the radiologically contaminated materials and equipment for disposal in the ERDF. The following positive aspects involved with removing the materials and equipment should be noted:

- Removal of the materials and equipment from the laydown yard appears to be in line with the IAMIT workgroups' desire to provide a disposal path forward for contact handled low level waste into the ERDF. This concept is outlined in letter, 0304714A, *Contract No. DE-AC06-96RL13200 – Results from Interagency Management and Integration Team (IAMIT) Sitewide Waste Management Strategy Workgroup All Hanford Waste Potentially Eligible for Environmental Restoration Disposal Facility (ERDF), S. A. Sieracki to R. G. Gallagher, December 2, 2003.*
- The proximity of the laydown yard to the 224-B building provides ease of removal since the equipment and workers are in the area to support the 224-B building demolition.
- The removal of the materials and equipment from the laydown yard would benefit the project from a housekeeping standpoint, as well as removing potential safety concerns, including removal of contamination, removal of areas infested with rodents, and mitigation of other hazards.
- The removal of the materials could be performed with existing resources deployed for the 224-B removal action.

This addition may necessitate adjustments to 224-B CERCLA documentation, such as the air monitoring plan, sampling and analysis plan, and/or the waste management plan may be necessary to facilitate the removal of the laydown yard materials and equipment.

I believe that the benefit to cleaning up and disposing the materials and equipment in the B Plant laydown yard outweighs the amount of work that may be required to adjust the 224-B CERCLA documentation, and should be included in the 224-B removal action.

Michael Stevens

RECEIVED
FEB 23 2005

EDMC