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U.S. Environmental Protection Agency  
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Subject: Review and Comment of "Engineering Evaluation/Cost Analysis for the 2335 Plutonium Concentration Facility"

Dear Ms Pamela Innis

The following comments on the above subject including 202-S (Redox) follow 34 years experience, five in reactor operations, 29 in the Health Physics Department including Radiological Engineering. I also had the opportunity to be located at Redox during its operation.

1. Page 2-6, Figure 2-3; Indicates a floor plan of the 233-S building as configured today. However, in the mid 1950's it was somewhat different. It is different as a result of an incident at that time when the entire interior of the building including the SWP lobby was contaminated along with several personnel which received an internal deposition.
2. Page 2-12, Table 2-1; Lists the contamination in the Process Hood but does not include the Beta-Gamma Cs 137 said to exist on the floor. I would suggest that the presence of this isotope be determined by analysis not an ion chamber. The gamma reading of 715 mr/hr is more than likely due to the decay of the isotope listed in Table 2-1, which does not indicate the ingrowth of Am 241, which must be present.

#### General Comment

While this facility may pose some environmental problems, it appears that it was randomly chosen. Criteria should be developed with regards to the old process buildings based on their configuration. This needs to be completed quickly. Case in point, the 202-S process building unlike T, B, U, or Purex building has a metal roof and the facility is now 45 years old. The supports of the roof are in a corrosive environment. If the final disposition is not until 2017 it will make it 65 years old. It will not last that long. Should it collapse, the supply fans in 222-S which face Redox would be contaminated since the system is approximately 37% efficient. Depending on wind direction highway 240 may become contaminated also. This would place the credibility of both federal and state agencies in serious doubt.

If you have any questions about my comments call me at 946-6474.

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