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May 14, 2004

Mr. William J. Taylor
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

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Re: Silo 3 - Pneumatic Retrieval Hose

Dear Mr. Taylor:

During the recent Silo 3 Isolated Systems Operability Testing (ISOT), numerous leaks occurred with the pneumatic retrieval hoses. While the failed pneumatic retrieval hoses have been replaced with a new hose, not all pneumatic retrieval hose has been replaced. Ohio EPA is concerned that a failure analysis has not been performed on the original hose and that all of the original hose has not been replaced.

The ISOT did not operate for an extended period of time. The types of leaks that occurred during this testing will not be acceptable once the facility goes "hot". A failure analysis of the original hose may reveal specific design requirements for a replacement hose. Other concerns arise from the failure of the pneumatic retrieval hoses. If the same basis of conservatism was used on other portions of the plant, have those been reevaluated to ensure they weren't similarly incorrect?

Following the failure, a secondary containment sleeve was proposed as a possible design change for this problem. Will the sleeve withstand the pressure exerted on it by a penetration of the inner hose should another failure occur? How will the replacement hose be assessed during operations to ensure failure is not imminent and that unacceptable abrasion is not occurring?

Ohio EPA requests that DOE provide information and engineering specifications for the original and replacement hoses that clearly defines that the replacement hoses will not fail during the operation Silo 3 remediation facility. The new pneumatic retrieval hose will need to undergo significant testing to ensure its viability. Start-up of the Silo 3 remediation facility using silo contents should not occur until this information is provided to and reviewed by Ohio EPA.

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If you have any questions, please contact me at (937) 285-6466.

Sincerely,



Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Michelle Cullerton, Tetra Tech EM Inc.
Ruth Vandergrift, ODH