

CROSS EXAMINATION BY MR. EARDLEY

Q. One thing that is difficult for me to understand since this model business is brand-new to me — I have never heard of it until today — is, if you don't have any idea what's going to come into the atmosphere, how can you predict by any means what the ecological effect of that substance is about whose possible nature and quantity you have no idea?

A. We have learned through the last twenty years of use of DDT that we simply cannot introduce these kinds of materials into the environment if we don't have the basis for predictions. We can get it by appropriate studies. We can develop this predictive capability without having contaminated the environment.

THE COURT: He asked how Jo you do that?

Q. When you have an unknown, how do you arrive at a known?

A. By investigating the physical and chemical and biological characteristics of the material moving through the system under laboratory conditions so that you get individual rate functions or process equations that can be utilized in the system as a whole.

Q. If we wanted to spend \$4 million dollars to have you go out to Rulison, what would be your assumption in making a model as to how much tritium was going to come up? You would have to know that, wouldn't you?"

A. Not while you develop the model. Once you have a functioning model with the physical and chemical and biological characteristics of tritium operating in the transfer process, then, simply in the computer you can say we will put in 500 curies and see where it comes out. Then, we would put in 10,000 curies and see where it ends up in the environment, it's got to go somewhere, and we would know where it's going to be.

MR. EARDLEY: No further questions.

CROSS-EXAMINATION BY MR. SEARLS:

Q. Have you made any laboratory tests of tritium”?

A. No, I have not.

MR. SEARLS: That’s all.