

REDIRECT EXAMINATION

Q. Are you familiar with some of the literature with respect to the environmental effects of tritium”!

A. Yes.

Q. Are there laboratory studies with respect to trillium that you know of that are adequate to plug into a model for the purpose of modeling the physical and chemical properties and biological properties of trillium?

A. There has been some work but there is no major program investigating these characteristics that would be suitable at this time for plugging into these rate function equations.

Q. Doctor, as I understand your model, once you have got it in a descriptive form, then all you need to add to it to get a quantitative answer is the exact amount of tritium being released at a point? Is that what you’re trying to explain?... - After you have developed a model, but when you don’t know the amount of tritium that’s going to be released into the region that you have just modeled, what does the model tell you, if anything”!

A. The model will give you the estimated response. That would be the levels of tritium at certain points in that region and different materials in that region as a function of some specified input and we could simply look at where the tritium would be and in what concentration, given some input of 10,000 curies or some smaller amount, it would be possible to actually determine what the level of input is, presumably in this kind of model.

Q. When the amount of tritium to be released in the system [modeled] is known, what can the model tell us when you put this number in”!

A. It tells us what the concentration and the loading of the environment, both over short periods and cumulatively over an extended period of time, will be.

Q. And if the model fairly and accurately represents the transfer systems, then whatever amount of tritium is released, a small or

a large amount, you can tell where it's going and where it's going to end up, is that right"!

A. That's right.

MR. YANNACONE: I have no further questions.

Your Honor, since I am leaving for a large portion of the rest of the case, I want to say it has been a privilege and an honor to practice in this District and I am sorry if I have caused the Court any inconvenienc.