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- Underlying issues with background radon
- Radon measurement issues
- Regulatory issues
- Proposed plan to address regulatory requirements and license conditions



Issues with Background Radon

- Range of outdoor radon (UNSCEAR 2006)
 - Average = 10 Bq/m^3 , range = $1 100 \text{ Bq/m}^3$
 - Average = 0.27 pCi/L, range = 0.027 2.7 pCi/L
- Factors impacting background radon concentrations (independent of measurement systems)
 - Long-term weather patterns
 - Seasonal variation
 - Small scale differences due to soil type and meteorological dispersion
- Variability of background can be much greater than the values we are trying to measure



Issues with Background Radon

• Crow Butte background station radon results (annual averages)

- June 1998 to December 2013
- Median = 0.4 pCi/L
- Range = 0.2 1.5 pCi/L (individual sample max 2.1 pCi/L)
- If EF = 1, trying to measure increment that is less than 1/10th of background fluctuations and ½ of the equipment LDL



Radon Measurement Issues

- Sample station measurements have similar uncertainty
- To determine incremental radon subtracting two numbers with relatively high uncertainty
 - Equipment uncertainty (systematic and random)
 - Background uncertainties (long-term, seasonal, local geological)
 - Physical (terrain, soils, distances)



Radon Measurement Issues



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Radon Measurement Issues

- The amount of incremental radon permitted to remain below dose limits is small
- There is a small margin for error we need high level of accuracy and certainty about measurements
- Quick MARSSIM assessment indicates on the order of 100's of samples are required at each station to ensure incremental radon below 0.1 pCi/L with reasonable accuracy and certainty (alpha = 0.05).
- A system based solely on measurements is not practical



Regulatory Requirements

• 10 CFR 40.65 states:

"...the report must specify the <u>quantity</u> of each of the principal radionuclides released to unrestricted areas in liquid and in gaseous effluents during the previous six months of operation...."

- For gaseous releases, this is a 3D problem with dispersion, deposition, radioactive decay, etc.
- 2 options:
 - Measure at each source and model the amount going to the unrestricted areas (each source: wellheads, pipes, HH, CPP, etc.)



- Measure at some environmental stations and model backwards to source
- Measurements alone do not satisfy 10 CFR 40.65





• Combination of measurements and modeling

- Measurement alone is not practical, does not fulfill all regulatory requirements
- Models need to be verified to ensure reasonable and accurate
- MILDOS-Area model that is verified statistically with measurements:
 - Reg Guide 3.59 for sources with optimization of release terms
 - Model optimization attempt source term measurements (e.g. RnG in water) to better quantify model inputs
 - Validate dispersion modeling results with field measurements





• Verified modeling:

- Is a practical and reasonable approach that meets regulatory requirements
- Is a solution to relatively high uncertainties with sampling
- Provides equilibrium factors to allow more realistic dose calculations
- Promotes regulatory confidence by reducing erroneous results (false positives over dose limit)





• Thank you!

