ODCM

OFFSITE DOSE CALCULATION MANUAL

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TABLE OF CONTENTS

SECTION		TITLE	PAGE

TABLE OF CONTENTS

SECTION **TITLE** **PAGE**

TABLE OF CONTENTS

SECTION **TITLE** **PAGE**

TABLE OF CONTENTS

SECTION	TITLE	PAGE

LIST OF TABLES AND FIGURES

1.0 OFFSITE DOSE CALCULATION MANUAL ADMINISTRATION

1.1 Purpose

The PBNP Offsite Dose Calculation Manual contains the current methodology and parameters for the calculation of offsite doses due to radioactive gaseous and liquid effluents. This manual describes a methodology for demonstrating compliance with 10 CFR 50, Appendix I dose limits. Compliance with Appendix I is demonstrated by periodic calculation of offsite doses based on actual plant releases and comparison to Appendix I dose limits.

The manual also details the methodology for the determination of gaseous and liquid effluent monitor alarm set points. The PBNP Radiation Monitoring System (RMS) effluent monitor alarm set points are established to ensure that controlled releases of liquid and gaseous radioactive effluents are maintained as low as is reasonably achievable. The setpoints also are established to ensure that concentrations of radioactive material released in effluents to the atmosphere do not exceed the values of Table 2, Column 1, of Appendix B to 10 CFR 20.1001-20.2402 at or beyond the site boundary and to ensure that the concentrations of radioactive materials released in liquid effluents to the unrestricted area conform to (do not exceed) 10 times the concentration values in Table 2, Column 2 of Appendix B to 10 CFR 20.1001-20.2402.

The manual also details the methodology for evaluating the radiological impact of sewage treatment sludge disposal. This methodology addresses the commitments made to the United States Nuclear Regulatory Commission in our application dated October 8, 1987 (NRC-87-104) and accepted by the USNRC in a letter dated January 13, 1988. This application was submitted in accordance with the provisions of 10 CFR 20.302(a). A copy of the submittal and subsequent modifications is contained in Appendices E - H. Dose limits are established in the application to ensure the health and safety of the maximally exposed member of the general public and the inadvertent intruder. 10 CFR 50, Appendix I dose limits do not apply to sewage treatment sludge disposal.

1.2 General Responsibilities

The primary responsibility for the implementation of the PBNP offsite dose calculation program and for any actions required by the program resides with the Radiological Engineering (RE). RE will provide the technical, regulatory, licensing, and administrative support necessary to fulfill the requirements of this manual. The calculation of offsite doses and analysis of data are RE responsibilities.

The Manager, PBNP is responsible for assuring that Radiation Monitoring System alarm set points are established and maintained in accordance with the methodologies outlined in this manual. The Manager, PBNP is also responsible for assuring the performance of periodic release summaries for the purpose of demonstrating compliance with PBNP effluent release limits.

1.3 Manual Revisions

This manual describes the current scope of the PBNP offsite dose calculation program. The program and the manual are maintained by RE. Program items or procedures may be periodically updated or changed, either to reflect new parameters or to improve program effectiveness. This manual may be revised at the discretion of RE with the concurrence of the PBNP Manager's Supervisory Staff (MSS).

2.0 RADIATION MONITORING SYSTEM AND RELEASE ACCOUNTING

A computerized Radiation Monitoring System (RMS) is installed at Point Beach Nuclear Plant (PBNP). The RMS includes area, process, and effluent monitors. A description of those monitors used for liquid and gaseous effluents is presented in Tables 2-1 and 2-2. The liquid and gaseous waste processing flow paths, equipment, and monitoring systems are depicted in Figures 2-1 and 2-2. Calibration of the RMS detectors is accomplished in accordance with procedures contained in the PBNP Health Physics Calibration Manual. The set point methodology is described in Section 3 of this manual.

The RMS is designed to detect and measure liquid and gaseous releases from the plant effluent pathways. The RMS will initiate isolation and control functions on certain effluent streams identified in Tables 2-1 and 2-2. Complete monitoring and accounting of nuclides released in liquid and gaseous effluents is accomplished with the RMS together with the characterization of nuclide distributions by laboratory analysis of grab samples. Sampling frequencies and analysis requirements are described in Tables 6-1 and 6-2 of the Radiological Effluent Control Manual. The various aspects of grab sampling and release accountability are described in the PBNP Release Accountability Manual.

TABLE 2-1
RADIOACTIVE LIQUID WASTE EFFLUENT MONITORS

CHANNEL NUMBER	NAME	CONTROL FUNCTION	DETECTOR TYPE
1 (2) RE-216	Containment Fan Coolers Liquid Monitors	None	Scintillation
RE-218	Waste Disposal System Liquid Monitor	Shuts waste liquid overboard	Scintillation
1 (2) RE-219	Steam Generator Blowdown Liquid Monitors	Shuts steam generator blowdown isolation valves, blowdown tank outlet valves and steam generator sample valves	Scintillation
RE-220	Spent Fuel Pool Liquid Monitor	None	Scintillation
RE-223	Waste Distillate Overboard Liquid Monitor	Shuts waste distillate overboard isolation valve	Scintillation
1 (2) RE-229	Service Water Discharge Monitors	None	Scintillation
RE-230	Retention Pond Discharge Liquid Monitor	None	Scintillation
1 (2) RE-222	Steam Generator Blowdown Tank Outlet Monitor	Shuts steam generator blowdown isolation valves and blowdown tank outlet valves	GM Tube

TABLE 2-2
RADIOACTIVE GASEOUS WASTE EFFLUENT MONITORS

CHANNEL NUMBER	NAME	CONTROL FUNCTION	DETECTOR TYPE
1 (2) RE-212	Containment Noble Gas Monitor	Actuates containment ventilation isolation	Scintillation
RE-214	Auxiliary Building Exhaust Ventilation Noble Gas Monitor	Shuts gas release valve and shifts auxiliary building exhaust through carbon filters	Scintillation
1 (2) RE-215	Condenser Air Ejector Noble Gas Monitors	None	Scintillation
RE-225	Combined Air Ejector Low-Range Noble Gas Monitor	None	Scintillation
RE-221	Drumming Area Vent Noble Gas Monitor	None	Scintillation
RE-224	Gas Stripper Building Exhaust Noble Gas Monitor	None	Scintillation
1 (2) RE-305	Unit 1 and 2 Purge Exhaust Noble Gas Monitors (Channel 5 on SPING Units No. 21 and No. 22)	Containment ventilation isolation	Scintillation
RE-315	Auxiliary Building Exhaust Ventilation Noble Gas Monitor (Channel 5 on SPING Unit No. 23)	None	Scintillation
RE-325	Drumming Area Ventilation Noble Gas Monitor (Channel 5 on SPING Unit No. 24)	None	Scintillation

FIGURE 2-1
RADIOACTIVE LIQUID WASTE EFFLUENT MONITORS

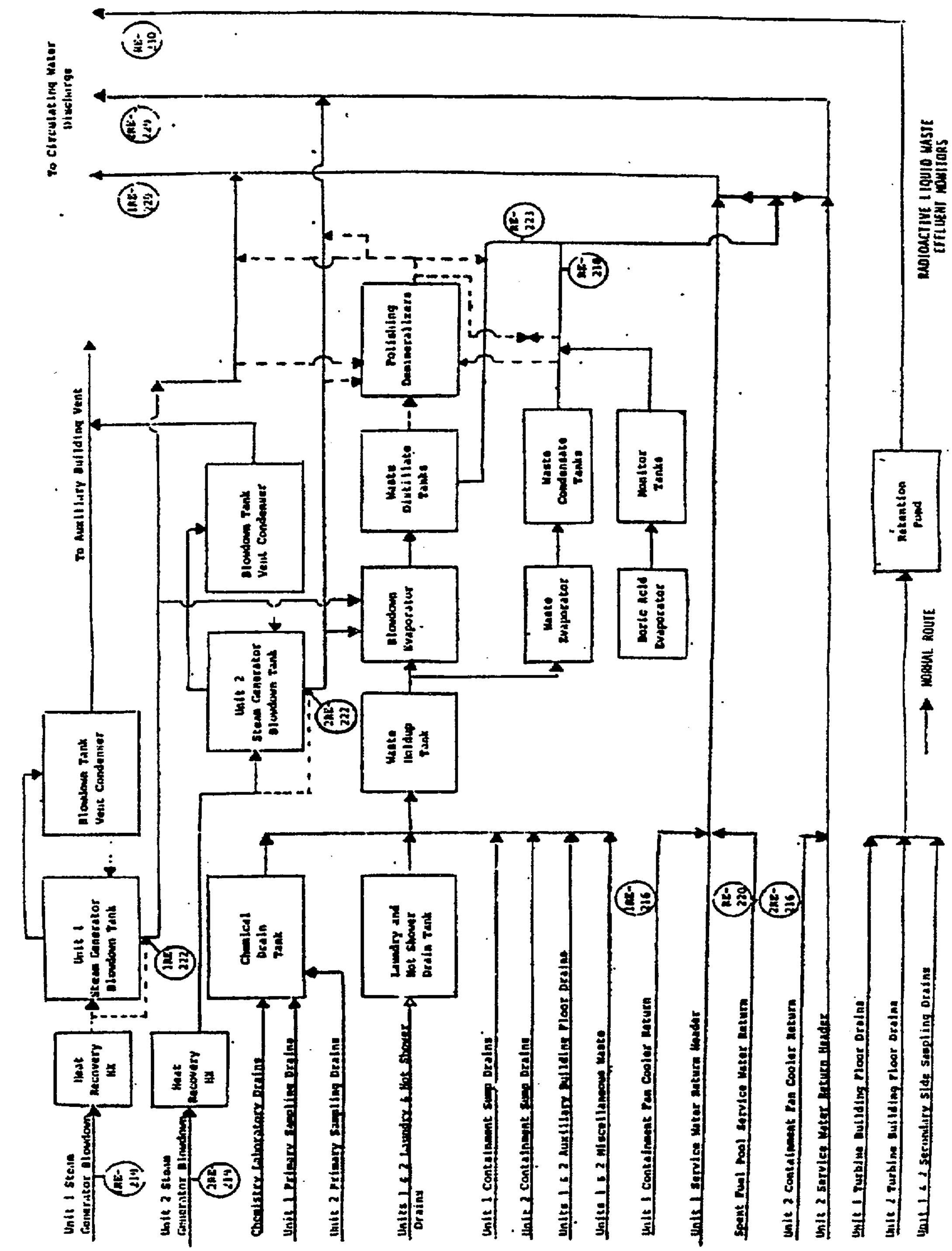
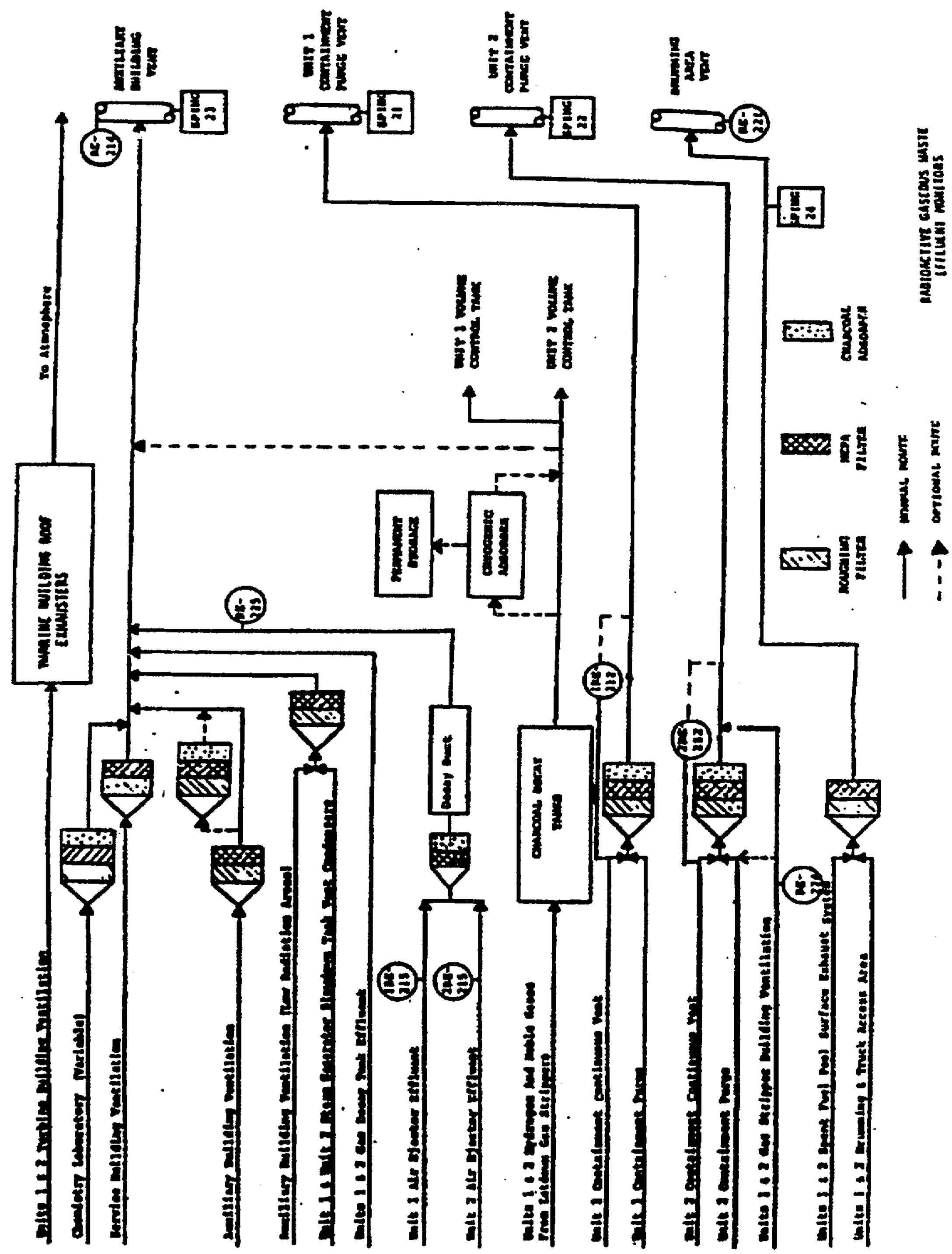


FIGURE 2-2
RADIOACTIVE GASEOUS WASTE EFFLUENT MONITORS



3.0 METHODOLOGY FOR DETERMINING ALARM SET POINTS

3.1 Introduction

The selection and maintenance of alert and alarm set points for each effluent monitor of the PBNP radiation monitoring system will be accomplished within the guidelines of this section. The computerized PBNP radiation monitoring system permits each effluent radiation monitor to be programmed to alarm at two distinct set-points. The alert set point, typically twice the steady-state reading, is intended to delineate a changing plant condition which may warrant corrective action. The high alarm or trip set point either will actuate a control function as applicable or will require corrective action to be initiated.

3.2 Objective

The effluent monitor set points are established to ensure that controlled releases of liquid and gaseous radioactive effluents are maintained as low as is reasonably achievable, to ensure releases result in concentrations to unrestricted areas within specified limits and to ensure that the dose limits of 10 CFR 50, Appendix I are not exceeded.

3.3 Alert Set Point Guidelines

The alert set point of each effluent monitor generally will be set to alarm at two times the established steady-state reading. The alert set point is normally set at concentrations well below the alarm set point value and is never to be set in excess of the alarm set point. In the course of plant operations, certain situations may require a deviation from the two times steady-state guideline. The intent of the alert set point is to warn of changing plant conditions which may warrant an evaluation of the cause of the increased radiation. If the increased reading is actually due to an increased radiation inventory within the system being monitored, as opposed to an increased background radiation field in the vicinity of the detector, an evaluation should be made to determine the impact of the release. The alert set point may be adjusted with the approval of the Duty Shift Superintendent. Alert set point adjustments are to be made in accordance with the PBNP RMS Alarm Set Point and Response Book.

3.4 Alarm or Trip Set Point Guidelines

In accordance with the requirements of 10 CFR 20.1001 - 20.2402 and TS stated in Section 5 of the Radiological Effluent Control Manual, the alarm or trip set point for effluent monitors shall be established to annunciate at radiation levels which would result in an unrestricted area concentration equal to or less than the applicable maximum effluent concentration (MEC) for a single radionuclide. However, for a mixture of radionuclides, the set point shall be established so that the summation of fractions, as defined in Appendix B of 10 CFR 20 (see Section 3.6), is less than or equal to one (1). The appropriate detailed response to an effluent alarm is described in the PBNP RMS Alarm Set Point and Response Book.

3.5 Monitor Calibration and Calibration Constant Determination

Calibration of the RMS effluent detectors is accomplished in accordance with procedures contained in the PBNP Health Physics Calibration Manual. Noble gas effluent monitors apply the calibration constant to standardize all gaseous releases to the 1985-1991 average isotopic noble gas distribution. The calibration constants are based on the calculated monitor response to the beta energy distribution in the 1985-1991 average isotopic noble gas distribution.

Noble gas effluent monitor calibration constants are derived from the following formulae:

$$\text{Cal. Constant} = \frac{1}{\text{Sensitivity}}$$

and

$$\text{Sensitivity} = \frac{\text{Monitor Response}}{\Sigma\,(\text{microCi/cc}_i)}$$

where:

Monitor response = the calculated counts per minute registered by monitor exposed to the 1985-1991 average noble gas isotopic distribution

$\Sigma(\mu Ci/cc_i)$ = total concentration of isotopes in the 1985-1991 average noble gas isotopic distribution

The liquid effluent monitors apply the derived calibration constant to standardize all liquid releases to the total concentration in the release path. The calibration constants are based on the monitor response to the 1985-1991 average liquid isotopic distribution. Each liquid monitor channel displays the effluent concentration in terms of a total release concentration.

Liquid effluent monitor calibration constants are derived from the following formulae:

$$\text{Cal. Constant} = \frac{1}{\text{Sensitivity}}$$

and

$$\text{Sensitivity} = \frac{\text{Monitor Response}}{\Sigma\left(\mu Ci / cc_i\right)}$$

where:

Monitor Response = the counts per minute registered by monitor exposed to calibration source

$\Sigma(\mu Ci/cc_i)$ = total concentration on radionuclides in the 1985-1991 average liquid effluent isotopic distribution

The QAD computer program may be utilized to predict or determine monitor calibration constants. Application of the QAD program may be appropriate for determining monitor response for accident source terms or other instances when the use of a calibration source is impracticable. The methodology for determination of calibration constants using the QAD program is maintained by the staff of the RE.

3.6 Determination of the Effective Maximum Effluent Concentration (EMEC) for Liquid Releases

Pursuant to PBNP TS, the concentration of radioactive materials in liquid effluent may not exceed 10 times the values of Column 2, Table 2, of Appendix B to 10 CFR 20.1001-20.2402. However, as a conservative measure, the following determination of the EMEC and the subsequent setpoint determination for liquid effluent (Section 3.7) do not employ the augmented concentration values.

In order to fulfill the requirements of 10 CFR 20, the RMS set point must be a value which will alarm when a liquid effluent would contain enough radionuclides to cause the effluent concentration limit of 10 CFR 20, Appendix B, Table 2, Column 2 for a single radionuclide to be exceeded, or for a mixture of radionuclides, the summation of fractions (SOF), as defined in Appendix B, to exceed one (1). Dividing the average isotopic concentrations for the years 1985-1991 by the SOF scales the total of individual concentrations up to the value where the SOF equals one. This total concentration is called the effective maximum effluent concentration (EMEC) and its calculation is described below. (For a complete discussion of the EMEC derivation, see Appendix A.)

The SOF is calculated using the formula found in the revised 10 CFR 20, Appendix B, Note 4:

$$SOF = \Sigma\, C_i/MEC_i$$

where:

C_i = concentration of radionuclide "i" (μCi/ml) in effluent (annual discharge/total volume of discharge)

MEC_i = maximum effluent concentration for unrestricted areas from Appendix B, Table 2, Column 2 of the revised 10 CFR 20.

The SOF for radionuclides in liquid effluent for the years 1985 through 1991 were averaged and applied to the average of the isotopic concentrations for the same years. Na-24 and H-3 were not used in the calculations (see Appendix A for details).

Next, the "effective MEC" or EMEC is calculated using the formula:

$$EMEC = \Sigma C_i / \Sigma (C_i/MEC_i) \text{ or } \Sigma C_i * 1/SOF$$

where the variables are the same as defined above.

The average EMEC, based on 1985-1991 data is 4.29E-06 µCi/cc. This is the maximum non H-3 radionuclide mixture concentration that could be released in liquid effluent without the SOF exceeding one (1).

However, the 10 CFR 20, Appendix B criterion is that the SOF for all radionuclides, including H-3 which cannot be measured by the liquid effluent NaI RMS monitors, be less than or equal to one (1). Therefore, the above equation modified by a factor of 0.70 (see Appendix A) to account for H-3 becomes

$$EMEC = 0.70 \Sigma C_i / \Sigma (C_i/MEC_i) \quad \text{or} \quad \Sigma C_i * 0.70/SOF.$$

The EMEC becomes

$$EMEC = 0.70 * 4.29E\text{-}06 = 3.00E\text{-}06 \ \mu Ci/cc.$$

Only three radionuclides identified in PBNP liquid effluent have a lower MEC (10 CFR 20, Appendix B, Table 2). They are I-131 (1E-06), Cs-134 (9E-07), and Cs-137 (1E-06).

Note that the use of the 0.7 modifying factor sets the SOF for non-tritium radionuclides to 0.7 and allows an SOF of 0.3 for H-3. A SOF of 0.3 limits the discharge concentration of H-3 to 0.3 MEC or 3E-04 µCi/cc. The factor of 0.3 may be changed as needed for releases for which the isotopic mixture and concentrations are known as long as the total SOF ≤1.

3.7 Determination of Liquid Effluent Monitor Alarm Set Point

The alarm set point for each liquid monitor is based upon the 1985-1991 average radionuclide concentration in the effluent discharged to the unrestricted area. The radionuclide concentration in the release is calculated assuming a minimum circulating water flow rate of 206,000 gpm and the maximum flow rate of the individual liquid effluent waste stream. The isotopic distribution of the waste stream is obtained from the historical PBNP release data for the seven years mentioned above. Set points are determined such that the sum of all radionuclides in the mixture, when released into the circulating water system, will be maintained at or below the unrestricted area EMEC.

Set points are calculated using the formula

$$SP = EMEC * \frac{\text{Circ water flow rate (gpm)}}{\text{Waste Discharge Flow Rate (gpm)}}$$

where

SP = RMS alarm set point in μCi/cc

EMEC = effective maximum effluent concentration

Circ water flow rate = total flow from Unit 1 + Unit 2

Waste discharge flow rate = flow rate for effluent line on which the monitor is located

Maximum waste discharge flow rates and monitors associated with each liquid effluent pathway are described in Table 3.7-1.

Default alarm set points normally are established based upon the maximum waste discharge flow rate and the minimum circulation water flow rate. The liquid release monitor default set points are listed in Table 3.7-2. Alarm set points may be adjusted for batch releases, when actual flow rates are known. Alarm set point adjustments which are higher than default values, are to be made in accordance with the provisions and methodologies of this section and requires approval of the MSS. Lower alarm set point values maybe used without MSS approval if the default values lie outside the upper range of the monitor or if compliance with applicable limits will not be compromised.

TABLE 3.7-1
SUMMARY OF LIQUID DILUTION AND EFFLUENT PATHWAY FLOW RATES

LIQUID EFFLUENT PATHWAY	DISCHARGE FLOW RATE (GPM)	PATHWAY MONITOR
RECIRCULATION WATER		
1 pump, either unit	206,000	None
2 pumps, either unit	350,000	
1 pump, each unit	392,000	
1 pump, one unit & 2 pumps, other unit	530,000	
2 pumps, each unit	680,000	
SERVICE WATER RETURN (normal cooldown per pump		1 (2) RE-229
2 pumps @ 7500 gpm	15,000	
3 pumps @ 6300 gpm	18,900	
4 pumps @ 5100 gpm	20,400	
5 pumps @ 4300 gpm	21,500	
6 pumps @ 3700 gpm	22,200	
STEAM GENERATOR BLOWDOWN		1 (2) RE-219 & 1 (2) RE-222
Max flow	200	
RETENTION POND		RE-230
Max Flow Rate (2 pumps)	360	
(sliding gate open)	1670	

TABLE 3.7-1, cont
SUMMARY OF LIQUID DILUTION AND EFFLUENT PATHWAY FLOW RATES

LIQUID EFFLUENT PATHWAY	DISCHARGE FLOW RATE (GPM)	PATHWAY MONITOR
SPENT FUEL POOL		RE-220
Max Flow Rate	700	
WASTE DISTILLATE & CONDENSATE TANK DISCHARGE		RE-218 & RE-223
Max Flow Rate	100	
CONTAINMENT FAN COOLER RETURN		1 (2) RE-216
Max Flow Rate per Containment	4000	

TABLE 3.7-2
LIQUID PATHWAY MONITOR
CALCULATED DEFAULT SET POINTS

MONITOR	FLOWRATE (gpm)	SET POINT (μCi/cc)
1 (2) RE-229	6 @ 3700[1]	2.78E-05
1 (2) RE-219 & 1 (2) RE-222	200	3.09E-3
RE-230	1670	3.70E-04
RE-220	700	8.83E-04
RE-218 & RE-223	100	6.18E-03
1 (2) RE-216	4000	1.55E-04

[1] six service water pumps at normal cooldown flow rates

3.8 Determination of EMEC for Atmospheric Releases

The maximum concentration of the mixture of radionuclides that is allowable at the site boundary is called the effective maximum effluent concentration (EMEC). The EMEC for an effluent mixture is defined by the equation

$$EMEC = \Sigma C_i \;/\; \Sigma(C_i \;/\; MEC_i)$$

where

C_i = concentration of radionuclide "i"

MEC_i = maximum effluent concentration for radionuclide i from 10 CFR 20, Appendix B, Table 2

$\Sigma (C_i \;/\; MEC_i)$ = summation of fractions (SOF), as discussed in Section 3.6, applied to atmospheric releases

The EMEC is calculated from the reference radionuclide mixture. This mixture is obtained from the 1985 - 1991 average annual atmospheric releases and the corresponding concentrations determined from the highest annual average χ/Q. (Details of the EMEC calculation are found in Appendix B.)

The calculated EMEC, corrected for H-3, of 1.92E-08 μCi/cc was obtained to be used in the set point calculations.

3.9 Determination of Gaseous Effluent Monitor Alarm Set points

The alarm set point for each monitor is based upon maintaining the concentration of the reference radionuclide mixture at or below the EMEC. The set point is calculated using the formula

$$SP = 2.12E{+}03 * EMEC / (\chi/Q * FR)$$

where

SP = set point in μCi/cc

2.12E + 03 = conversion factor for ft^3/min to m^3/sec

EMEC = 1.92E-08 μCi/cc

χ/Q = highest site boundary annual average 1.5E-06 sec/m^3

FR = the flow rate in ft^3/min of the effluent pathway being monitored.

Combining the above numerical values yields

$$SP(\mu Ci/cc) = 2.71E + 01 / FR$$

Gaseous effluent pathway discharge flow rates and monitors associated with each pathway are summarized in Table 3.9-1.

TABLE 3.9-1
SUMMARY OF GASEOUS EFFLUENT PATHWAY DISCHARGE FLOW RATES

	GASEOUS EFFLUENT PATHWAY		DISCHARGE FLOW RATE CFM	MONITOR(S) IN EFFLUENT PATHWAY
a.	Auxiliary Building Vent		66,400	RE-214 & SPING 23
b.	Combined Air Ejector		20	RE-225
c.	Unit Air Ejector		10	1 (2) RE-215
d.	Containment Purge Vent			
	1)	1 fan operating	12,500	1 (2) RE-212 &
	2)	2 fans operating	25,000	SPINGS 21 & 22
e.	Gas Stripper Building		13,000	RE-224
f.	Drumming Area Vent		43,100	RE-221 & SPING 24

Alarm set points are to be normally established based upon maximum waste discharge flow rates and the highest annual average χ/Q value at the site boundary. The alarm set points may be adjusted for release periods if actual flow rates are reduced to less than maximum values or actual χ/Q values are calculated. Alarm set point adjustments to higher values are to be made in accordance with the provisions and methodologies of this section and require MSS approval. Default set point values obtained using the flow rates in Table 3.9-1 are presented in Table 3.9-2. An additional reduction factor of 1/4 has been applied to the four release point monitors so that the maximum allowable site boundary concentrations will not be exceeded in the event simultaneous releases from these points occur. Lower set point values may be used for any of the monitors without MSS approval if the default value is outside the upper range of the monitor or if compliance with applicable release limits will not be compromised. The set point values for the SPINGs will be the same as the corresponding release point monitor; RE-214 (SPING 23), 1(2)RE-212 (SPINGS 21 and 22) or RE-221 (SPING 24).

TABLE 3.9-2
ATMOSPHERIC PATHWAY MONITOR
DEFAULT RMS SET POINTS

MONITOR	FLOW RATE (ft^3/min)	SET POINT (µCi/cc)
RE-214	66,400	1.02E-04
RE-225	20	1.36E+00
1RE-215	10	2.71E+00
2RE-215	10	2.71E+00
1RE-212	25,000[1]	2.73E-04
2RE-212	38,000[2]	1.78E-04
RE-224	13,000	2.09E-03
RE-221	43,000	1.58E-04

[1] 2 fans (with 1 fan the flow rate is 12,500 cubic feet/minute)

[2] 2 fans + 13,000 cfm from the gas stripper building

3.10 Determination of Maximum Release Rates

Technical specifications restrict the rate of release (Ci/sec) of radionuclides to the atmosphere to that value, which if continued for one year, would result in the following annual dose rates at or beyond the site boundary: 500 mrem/yr to the whole body and 3000 mrem/yr to the skin from noble gases; and, 1500 mrem/yr to any organ from I-131, I-133, H-3, and particulates with a half-life >8 days.

3.10.1 Noble gas release rate

The release rate for noble gases are calculated using the Reg. Guide 1.109 dose factors and the annual average isotopic noble gas release for the years 1985 - 1991 as shown in Table B-1. The calculated annual skin dose from the average 1985 - 1991 isotopic mixture with a total of 4.51E+01 curies is 4.12E-03 mrem. Therefore the maximum release rate is calculated from the formula

Ci/sec = total Ci * dose limit / (sec/yr * dose from total Ci).

Based on skin dose, the release rate formula

Ci/sec = 4.51E+01 Ci * 3000 mrem/yr/ (4.12E-03 mrem * 3.15E+07 sec/yr) yields a release rate of 1.04E+00 Ci/sec.

Using the same total curies with the same isotopic mixture but with the whole body dose of 8.21E-03 mrem/yr and the whole body dose limit of 500 mrem/yr, the release rate becomes 8.72E-02 Ci/sec.

Therefore the whole body dose rate is limiting and the maximum allowable PBNP noble gas release rate is 8.72E-02 Ci/sec. This rate is at higher than any PBNP noble gas release rate from 1985 - 1991 based on the highest reported hourly average release rates of approximately 4.3E-02 Ci/sec.

3.10.2 Release rate for I-131, I-133, H-3, and particulates released to the atmosphere with half-lives >8 days

During the time period of 1985 - 1991, PBNP released an annual average of 116.30457 Ci to the atmosphere consisting of I-131, I-133, H-3, and particulates whole half-life >8 days. Of this quantity, 116.30 was H-3 and 4.57E-03 was I-131, I-133, and particulates whose half-life was >8 days. The doses from this mixture, calculated using ODCM methodology are shown in Table 3.10.1.

Table 3.10-1 MREM from all radionuclides (1985 - 1991 average)

MREM from all radionuclides (1985 - 1991 average)

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
ADULT	1.66E-02	3.68E-02	5.74E-02	5.44E-02	2.01E-02	1.42E-02	1.23E-02	3.27E-02
TEEN	2.69E-02	5.25E-02	5.57E-02	4.64E-02	2.56E-02	1.72E-02	1.29E-02	3.27E-02
CHILD	6.31E-02	8.30E-02	5.48E-02	7.70E-02	3.73E-02	2.31E-02	1.60E-02	3.27E-02
INFANT	5.04E-02	6.77E-02	3.58E-02	1.04E-01	2.00E-02	9.39E-03	2.59E-03	3.27E-02

If the 1985 - 1991 average isotopic effluent mixture released to the atmosphere is broken down into the following grouping: H-3, I-131 and I-133, and the remaining radionuclides, the groups contribution to the various organ doses are revealed (Tables 3.10-2 - 3.10-4).

Table 3.10-2 MREM from I-131 and I-133 (2.42E-03 Ci)

MREM from I-131 AND I-133

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
ADULT	9.26E-05	1.32E-04	1.10E-04	4.31E-02	2.29E-04	0.00E+00	3.66E-05	4.20E-05
TEEN	8.52E-05	1.20E-04	9.82E-05	3.44E-02	2.06E-04	0.00E+00	2.50E-05	4.20E-05
CHILD	1.86E-04	1.88E-04	1.41E-04	6.17E-02	3.09E-04	0.00E+00	1.79E-05	4.20E-05
INFANT	2.63E-04	3.10E-04	1.71E-04	1.01E-01	3.62E-04	0.00E+00	1.17E-05	4.20E-05

Table 3.10-3 MREM from H-3 (116.3 Ci)

MREM from H-3

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
ADULT	0.00E+00	1.13E-02	1.13E-02	1.13E-02	1.13E-02	1.13E-02	1.13E-02	0.00E+00
TEEN	0.00E+00	1.19E-02	1.19E-02	1.19E-02	1.19E-02	1.19E-02	1.19E-02	0.00E+00
CHILD	0.00E+00	1.53E-02	1.53E-02	1.53E-02	1.53E-02	1.53E-02	1.53E-02	0.00E+00
INFANT	0.00E+00	2.35E-03	2.35E-03	2.35E-03	2.35E-03	2.35E-03	2.35E-03	0.00E+00

Table 3.10-4 MREM from all radionuclides except H-3 and radioiodines (2.15E-03 Ci)

	MREM from all radionuclides except H-3 and radioiodines							
	Bone	**Liver**	**T. Body**	**Thyroid**	**Kidney**	**Lungs**	**GI-LLI**	**Skin**
ADULT	1.65E-02	2.53E-02	4.59E-02	2.08E-09	8.49E-03	2.84E-03	9.41E-04	3.27E-02
TEEN	2.68E-02	4.04E-02	4.37E-02	2.64E-09	1.35E-02	5.25E-03	9.76E-04	3.27E-02
CHILD	6.29E-02	6.75E-02	3.94E-02	4.94E-09	2.16E-02	7.81E-03	6.72E-04	3.27E-02
INFANT	5.01E-02	6.51E-02	3.32E-02	1.88E-09	1.73E-02	7.04E-03	2.27E-04	3.27E-02

As evident from Tables 3.10-1 through 3.10-4, H-3 contributes a significant portion of the thyroid dose for all age groups for the 1985 - 1991 mixture of radionuclides released to the atmosphere. Comparison of Tables 3.10-5 and 3.10-6 to Table 3.10-4 reveals that the major portion of the organ doses from radionuclides other than H-3 and radioiodines results from cobalt and cesium. Cs-134 and Cs-137 are the major dose contributors to the bone, liver, skin and kidneys whereas cobalt is the major contributor to the GI-LLI dose. Therefore, the dose results obtained from the 1985 - 1991 radionuclide mixture is consistent with the dose results from current effluents.

Table 3.10-5 MREM from Cs-134 and Cs-137 (1.84E-03 Ci)

	MREM from Cs-134 and Cs-137							
	Bone	**Liver**	**T. Body**	**Thyroid**	**Kidney**	**Lungs**	**GI-LLI**	**Skin**
ADULT	1.62E-02	2.53E-02	4.21E-02	0.00E+00	8.48E-03	2.82E-03	4.76E-04	2.84E-02
TEEN	2.64E-02	4.04E-02	3.98E-02	0.00E+00	1.35E-02	5.22E-03	5.52E-04	2.84E-02
CHILD	6.22E-02	6.74E-02	3.54E-02	0.00E+00	2.16E-02	7.78E-03	4.05E-04	2.84E-02
INFANT	5.01E-02	6.50E-02	2.95E-02	0.00E+00	1.73E-02	7.02E-03	1.96E-04	2.84E-02

Table 3.10-6 MREM from Co-57, Co-58, and Co-60 (1.93E-04 Ci)

	MREM from cobalts							
	Bone	**Liver**	**T. Body**	**Thyroid**	**Kidney**	**Lungs**	**GI-LLI**	**Skin**
ADULT	0.00E+00	2.24E-05	3.72E-03	0.00E+00	0.00E+00	2.32E-05	4.26E-04	4.32E-03
TEEN	0.00E+00	2.97E-05	3.73E-03	0.00E+00	0.00E+00	3.40E-05	3.88E-04	4.32E-03
CHILD	0.00E+00	4.35E-05	3.80E-03	0.00E+00	0.00E+00	2.76E-05	2.43E-04	4.32E-03
INFANT	0.00E+00	7.75E-06	3.69E-03	0.00E+00	0.00E+00	1.78E-05	1.86E-05	4.32E-03

Based on these results, the release rates for various radionuclide mixture can be determined using the methodology in Section 3.10.1.

For the total radionuclide mixture, the maximum release rate is

Ci/sec =1.16E+02 Ci *1500 mrem/yr/ (1.04E-01 mrem * 3.15E+07 sec/yr)

or 5.33E-02 Ci/sec,

For radioiodines (I-131 and I-133), the maximum release rate is

Ci/sec =2.42E-03 Ci *1500 mrem/yr/ (1.01E-01 mrem * 3.15E+07 sec/yr)

or 1.14E-06 Ci/sec,

For H-3, the maximum release rate is

Ci/sec =1.16E+02 Ci *1500 mrem/yr/ (1.53E-02 mrem * 3.15E+07 sec/yr)

or 3.62E-01 Ci/sec,

For all radionuclides (other than H-3 and radioiodines) with a half-life > 8 days, the maximum release rate is

Ci/sec =2.15E-03 Ci *1500 mrem/yr/ (6.75E-02 mrem * 3.15E+07 sec/yr)

or 1.52E-06 Ci/sec,

For cesium (Cs-134, -137), the maximum release rate is

Ci/sec =1.84E-03 Ci *1500 mrem/yr/ (6.74E-02 mrem * 3.15E+07 sec/yr)

or 1.30E-06 Ci/sec,

For cobalt (Co-57, -58, -60), the maximum release rate is

Ci/sec =1.93E-04 Ci *1500 mrem/yr/ (4.26E-02 mrem * 3.15E+07 sec/yr)

or 2.16E-05 Ci/sec,

Finally, for the total of all radionuclides in the mixture except H-3, the maximum release rate is

Ci/sec =4.57E-03 Ci *1500 mrem/yr/ (1.01E-01 mrem * 3.15E+07 sec/yr)

or 2.15E-06 Ci/sec.

Because the limiting release rate is that of the radioiodines, a mixture of radionuclides whose half-lives is >8 days should be restricted to 1.14E-06 Ci/sec. However, if there is no I-131 and I-133, the cesium doses become limiting and the release rate limit may be raised to 1.30E-06 Ci/sec.

4.0 DEMONSTRATING COMPLIANCE WITH 10 CFR 50, APPENDIX I

4.1 Introduction

Maintaining effluents within the dose objectives of Appendix I is demonstrated at PBNP by periodic calculations. Compliance with Appendix I limits is demonstrated by periodically calculating doses to the maximum exposed individual using the methodology set forth in Regulatory Guide 1.109, Rev. 1, October 1977 and in other recognized sources such as ICRP publications.

In order to aid in the dose calculations, the formulae in Reg Guide 1.109 were rearranged to calculate the dose per curie released (mrem/Ci) to the environment. For each pathway given in Reg Guide 1.109, a radionuclide's mrem/Ci values for the whole body and the organs were calculated for each of the two release modes, liquid and atmospheric. All of the pathway doses for a radionuclide via the release mode under consideration were summed to obtain the radionuclide's total mrem/Ci released. These values, called total dose factors (TDFs), are listed in Tables 5.1.1 and 5.1.2. The application of TDFs are given in Section 5; the calculations used to obtain them, in Appendix C.

4.2 Dose Limits

To define the limits and conditions for the controlled release of radioactive materials in liquid and gaseous effluents to the environment, to ensure that these releases are as low as is reasonably achievable in conformance with 10 CFR Parts 50.34a and 50.36a, to ensure that these releases result in concentrations of radioactive materials in liquid and gaseous effluents released to unrestricted areas that are within the limits specified in 10 CFR 20, and to ensure that the releases of radioactive material above background to unrestricted areas are as low as is reasonably achievable, the following design release limits as defined in Appendix I to 10 CFR 50 apply:

A. The calculated annual total quantity of all radioactive material above background that may be released from each light-water-cooled nuclear power reactor to unrestricted areas should not result in an annual dose or dose commitment from liquid effluents for any individual in an unrestricted area from all pathways of exposure in excess of 3 millirems to the total body or 10 millirems to any organ.

B. The calculated annual total quantity of all radioactive material above background that may be released from each light-water-cooled nuclear power reactor to the atmosphere should not result in an annual air dose from gaseous effluents at any location near ground level which could be occupied by individuals in unrestricted areas in excess of 10 millirads for gamma radiation or 20 millirads for beta radiation, or that this quantity should not result in an annual external dose from gaseous effluents to any individual in unrestricted areas in excess of 5 millirems to the total body or 15 millirems to the skin.

C. The calculated annual total quantity of all radioactive iodine and radioactive material in particulate form above background that may be released from each light-water-cooled nuclear power reactor in effluents to the atmosphere should not result in an annual dose or dose commitment from such radioactive iodine and radioactive material in particulate form for any individual in an unrestricted area from all pathways of exposure in excess of 15 millirems to any organ.

D. Pursuant to NRC interpretation as stated in PBNP TS 15.7.8, the dose guideline of Section 4.2.C, above, applies only to I-131, I-133, H-3, and all particulate material released to the atmosphere which has a half-life >8 days. Particulates with shorter half-lives are not considered because of their negligible dose contribution.

4.3 Release Limits

Based on the Appendix I dose limits, Point Beach, being a two (2) unit nuclear plant, may release into the environment the quantities of radionuclides above background that fulfill the criteria listed below.

A. Pursuant to Section 4.2.A, the doses from radionuclides in the unrestricted area in liquids shall not exceed

1. Six (6) millirem to the whole body, or
2. Twenty (20) millirem to any organ.

B. Pursuant to Section 4.2.B, the doses from gaseous radionuclides in the unrestricted area shall not exceed

1. Twenty (20) millirads to the air from gamma radiation,
2. Forty (40) millirads to the air from beta radiation,
3. Ten (10) millirem to the whole body, or
4. Thirty (30) millirem to the skin.

C. Pursuant to Section 4.2.C, the dose from radioiodine and radioactive material in particulate form released to the atmosphere in the unrestricted area shall not exceed thirty (30) millirem to any organ.

D. Quarterly release limits are defined as ½ the annual limits.

4.4 EPA Regulations

Compliance with the provisions of Appendix I to 10 CFR 50 is adequate demonstration of conformance to the standards set forth in 40 CFR 190 regarding the dose commitment to individuals from the uranium fuel cycle. For 40 CFR 190 compliance, quarterly dose calculations shall include exposures from effluent pathways and direct radiation contributions from the reactor units and from any outside storage tanks.

The above calculations do not include contributions from the Kewaunee Nuclear Power Plant (KNPP) which is some four miles north of PBNP. Under normal operations using the PBNP annual average χ/Q and assuming that the KNPP source term is identical to either PBNP unit, the greatest KNPP dose contribution occurs at the north sector PBNP boundary. However, the total KNPP-PBNP dose at that point is less than the dose in the highest sector (south boundary) from PBNP alone. The KNPP contribution in this sector adds only 1 percent to 8 percent to the total dose depending upon the release mode. Even in the highly unlikely event that PBNP and KNPP operated for an entire year at twice the Appendix I levels, the small percentage contribution from KNPP would be insufficient to yield doses exceeding 40 CFR 190 limits.

5.0 CALCULATION AND COMPARISON OF EFFLUENT RELEASES TO RELEASE LIMITS

Technical Specification 15.7.8.3 requires that an effluent release summary and dose calculations be performed periodically. This section describes the methodology for the calculation of doses for comparison to the corresponding dose limits. For Appendix I compliance, the organ and whole body doses shall be calculated for the maximumly exposed individual in each age group using the appropriate total dose factors in mrem/Ci released which were obtained using Regulatory Guide 1.109 and other documented methodologies.

5.1 Appendix I Dose Calculations

5.1.1 Liquid Release Mode

The dose calculations for demonstration of compliance with the 10 CFR 50, Appendix I dose limits will be accomplished by the Radiological Engineering Group. Doses will be calculated for each month to track compliance with effluent and dose goals. The doses from each radionuclide will be calculated for each age group and for each organ, including the whole body, and summed over all the identified radionuclides released. The total dose is compared to the corresponding liquid release mode Appendix I dose limit for the organ in question. Noble gases released in liquids are added to the atmospherically released noble gases for Appendix I dose compliance calculations.

The doses are calculated using the following formula:

$$API = \Sigma\, Dose_{aomi} = \Sigma\,(TDF_{aomi} \times C_i) \leq K_{om} \text{ mrem}$$

where

API	=	the Appendix I dose for compliance evaluation in mrem
$Dose_{aomi}$	=	the dose to the specific age group (a) and organ (o) via release mode (m) from radionuclide (i)
TDF_{aomi}	=	total dose factor for the specific age group (a) and organ (o) via release mode (m) from radionuclide (i) from Table 5.1-1 in mrem/Ci
C_i	=	curies of radionuclide (i) released
K_{om}	=	the Appendix I dose limit for organ (o) and release mode (m) for which the calculation is being made.

The methodology and the values used to obtain the TDF_{aomi} values are given in Appendix C.

It is recognized that some of the release quantities may not be available at the end of the month because the samples from these release paths are sent to a vendor for analysis. Usually, the only radionuclides affected by these delays are Sr-89 and Sr-90. Because the quantities of these two radionuclides are but a small fraction of the total release, the absence of their dose contributions from the initial monthly dose calculation will not significantly affect the total dose obtained from the remaining radionuclides. The dose for the month will be updated upon the receipt of the vendor isotopic results and upon the receipt of any corrections to previous release quantities.

Note that all of the liquid release dose calculations assume that the discharge rate is 677,000 gpm. Whenever the average discharge rate for the month or year differs, the final dose calculated must be multiplied by the correction factor CF where:

CF = 677,000 gpm / actual average discharge gpm

This correction will produce a greater change during the winter months when the circ water flow rates are lower.

TABLE 5.1-1
LIQUID EFFLUENT DOSE FACTOR

Summation of dose per curie released factor calculations over the pathways: potable water, aquatic food, shoreline deposit, irrigated foods (milk), and irrigated foods (meat).

Dose factor - liquid release pathway (mrem/Ci released)

H-3

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	4.46E-06	4.46E-06	4.46E-06	4.46E-06	4.46E-06	4.46E-06
Teen	0.00E+00	4.04E-06	4.04E-06	4.04E-06	4.04E-06	4.04E-06	4.04E-06
Child	0.00E+00	6.67E-06	6.67E-06	6.67E-06	6.67E-06	6.67E-06	6.67E-06
Infant	0.00E+00	7.79E-06	7.79E-06	7.79E-06	7.79E-06	7.79E-06	7.79E-06

Dose factor - liquid release pathway (mrem/Ci released)

F-18

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.15E-07	9.12E-89	1.28E-08	0.00E+00	5.14E-89	0.00E+00	3.40E-09
Teen	1.21E-07	7.59E-89	1.35E-08	0.00E+00	4.35E-89	0.00E+00	1.09E-08
Child	1.51E-07	1.08E-88	1.50E-08	0.00E+00	5.74E-89	0.00E+00	4.08E-08
Infant	2.05E-12	0.00E+00	1.75E-13	0.00E+00	0.00E+00	0.00E+00	4.83E-13

Dose factor - liquid release pathway (mrem/Ci released)

Na-22

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	4.71E-03	4.71E-03	4.82E-03	4.71E-03	4.71E-03	4.71E-03	4.71E-03
Teen	5.48E-03	5.48E-03	6.07E-03	5.48E-03	5.48E-03	5.48E-03	5.48E-03
Child	8.32E-03	8.32E-03	8.45E-03	8.32E-03	8.32E-03	8.32E-03	8.32E-03
Infant	7.21E-03	7.21E-03	7.21E-03	7.21E-03	7.21E-03	7.21E-03	7.21E-03

Dose factor - liquid release pathway (mrem/Ci released)

Na-24

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.85E-04	1.85E-04	1.85E-04	1.85E-04	1.85E-04	1.85E-04	1.85E-04
Teen	1.98E-04	1.98E-04	1.98E-04	1.98E-04	1.98E-04	1.98E-04	1.98E-04
Child	2.40E-04	2.40E-04	2.40E-04	2.40E-04	2.40E-04	2.40E-04	2.40E-04
Infant	8.06E-05	8.06E-05	8.06E-05	8.06E-05	8.06E-05	8.06E-05	8.06E-05

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Sc-46							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.70E-07	3.31E-07	8.92E-06	0.00E+00	3.09E-07	0.00E+00	1.61E-03
Teen	1.52E-07	2.97E-07	4.94E-05	0.00E+00	2.84E-07	0.00E+00	1.01E-03
Child	3.54E-07	4.85E-07	1.05E-05	0.00E+00	4.29E-07	0.00E+00	7.09E-04
Infant	3.42E-07	4.94E-07	1.54E-07	0.00E+00	3.25E-07	0.00E+00	3.22E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Mn-54							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	3.28E-03	6.34E-04	0.00E+00	9.75E-04	0.00E+00	1.00E-02
Teen	0.00E+00	3.22E-03	6.86E-04	0.00E+00	9.59E-04	0.00E+00	6.60E-03
Child	0.00E+00	2.60E-03	7.04E-04	0.00E+00	7.30E-04	0.00E+00	2.19E-03
Infant	0.00E+00	1.92E-04	4.34E-05	0.00E+00	4.25E-05	0.00E+00	7.04E-05

Dose factor - liquid release pathway (mrem/Ci released)							
Cr-51							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	0.00E+00	1.01E-06	5.84E-07	2.15E-07	1.30E-06	2.46E-04
Teen	0.00E+00	0.00E+00	1.17E-06	5.60E-07	2.21E-07	1.44E-06	1.70E-04
Child	0.00E+00	0.00E+00	1.19E-06	6.44E-07	1.76E-07	1.18E-06	6.15E-05
Infant	0.00E+00	0.00E+00	1.72E-07	1.12E-07	2.45E-08	2.18E-07	5.01E-06

Dose factor - liquid release pathway (mrem/Ci released)							
Mn-56							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	3.18E-06	5.65E-07	0.00E+00	4.04E-06	0.00E+00	1.02E-04
Teen	0.00E+00	3.33E-06	5.94E-07	0.00E+00	4.22E-06	0.00E+00	2.19E-04
Child	0.00E+00	3.04E-06	6.86E-07	0.00E+00	3.67E-06	0.00E+00	4.40E-04
Infant	0.00E+00	1.97E-11	3.39E-12	0.00E+00	1.69E-11	0.00E+00	1.79E-09

Dose factor - liquid release pathway (mrem/Ci released)							
Fe-55							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	5.98E-04	4.13E-04	9.63E-05	0.00E+00	0.00E+00	2.31E-04	2.37E-04
Teen	6.11E-04	4.33E-04	1.01E-04	0.00E+00	0.00E+00	2.75E-04	1.88E-04
Child	9.35E-04	4.96E-04	1.54E-04	0.00E+00	0.00E+00	2.80E-04	9.19E-05
Infant	1.55E-04	1.00E-04	2.68E-05	0.00E+00	0.00E+00	4.91E-05	1.28E-05

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)
Fe-59

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	9.12E-04	2.14E-03	8.23E-04	0.00E+00	0.00E+00	5.99E-04	7.14E-03
Teen	9.22E-04	2.15E-03	8.40E-04	0.00E+00	0.00E+00	6.79E-04	5.09E-03
Child	1.29E-03	2.09E-03	1.04E-03	0.00E+00	0.00E+00	6.07E-04	2.18E-03
Infant	3.34E-04	5.84E-04	2.30E-04	0.00E+00	0.00E+00	1.73E-04	2.79E-04

Dose factor - liquid release pathway (mrem/Ci released)
Co-57

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	2.02E-05	3.57E-05	0.00E+00	0.00E+00	0.00E+00	5.13E-04
Teen	0.00E+00	2.06E-05	4.62E-05	0.00E+00	0.00E+00	0.00E+00	3.83E-04
Child	0.00E+00	2.31E-05	4.93E-05	0.00E+00	0.00E+00	0.00E+00	1.89E-04
Infant	0.00E+00	1.24E-05	2.02E-05	0.00E+00	0.00E+00	0.00E+00	4.24E-05

Dose factor - liquid release pathway (mrem/Ci released)
Co-58

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	8.49E-05	1.93E-04	0.00E+00	0.00E+00	0.00E+00	1.72E-03
Teen	0.00E+00	8.30E-05	2.04E-04	0.00E+00	0.00E+00	0.00E+00	1.14E-03
Child	0.00E+00	8.32E-05	2.57E-04	0.00E+00	0.00E+00	0.00E+00	4.85E-04
Infant	0.00E+00	3.84E-05	9.58E-05	0.00E+00	0.00E+00	0.00E+00	9.57E-05

Dose factor - liquid release pathway (mrem/Ci released)
Co-60

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	2.48E-04	6.82E-04	0.00E+00	0.00E+00	0.00E+00	4.66E-03
Teen	0.00E+00	2.44E-04	1.30E-03	0.00E+00	0.00E+00	0.00E+00	3.17E-03
Child	0.00E+00	2.49E-04	8.92E-04	0.00E+00	0.00E+00	0.00E+00	1.38E-03
Infant	0.00E+00	1.17E-04	2.77E-04	0.00E+00	0.00E+00	0.00E+00	2.79E-04

Dose factor - liquid release pathway (mrem/Ci released)
Ni-63

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.03E-02	2.10E-03	1.02E-03	0.00E+00	0.00E+00	0.00E+00	4.38E-04
Teen	3.13E-02	2.21E-03	1.06E-03	0.00E+00	0.00E+00	0.00E+00	3.52E-04
Child	5.00E-02	2.67E-03	1.70E-03	0.00E+00	0.00E+00	0.00E+00	1.80E-04
Infant	1.27E-02	7.85E-04	4.41E-04	0.00E+00	0.00E+00	0.00E+00	3.91E-05

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Ni-65							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.39E-06	4.40E-07	2.01E-07	0.00E+00	0.00E+00	0.00E+00	1.12E-05
Teen	3.66E-06	4.68E-07	2.13E-07	0.00E+00	0.00E+00	0.00E+00	2.54E-05
Child	4.68E-06	4.41E-07	2.57E-07	0.00E+00	0.00E+00	0.00E+00	5.40E-05
Infant	1.74E-10	1.97E-11	8.95E-12	0.00E+00	0.00E+00	0.00E+00	1.50E-09

Dose factor - liquid release pathway (mrem/Ci released)							
Cu-64							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	4.02E-06	1.89E-06	0.00E+00	1.01E-05	0.00E+00	3.43E-04
Teen	0.00E+00	4.31E-06	2.04E-06	0.00E+00	1.09E-05	0.00E+00	3.34E-04
Child	0.00E+00	4.30E-06	2.60E-06	0.00E+00	1.04E-05	0.00E+00	2.02E-04
Infant	0.00E+00	1.41E-06	6.52E-07	0.00E+00	2.38E-06	0.00E+00	2.89E-05

Dose factor - liquid release pathway (mrem/Ci released)							
Zn-65							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.73E-02	5.50E-02	2.49E-02	0.00E+00	3.68E-02	0.00E+00	3.46E-02
Teen	1.58E-02	5.50E-02	2.57E-02	0.00E+00	3.52E-02	0.00E+00	2.33E-02
Child	1.68E-02	4.47E-02	2.78E-02	0.00E+00	2.82E-02	0.00E+00	7.85E-03
Infant	1.32E-03	4.51E-03	2.08E-03	0.00E+00	2.19E-03	0.00E+00	3.81E-03

Dose factor - liquid release pathway (mrem/Ci released)							
Zn-69							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.97E-05	3.76E-05	2.62E-06	0.00E+00	2.44E-05	0.00E+00	5.65E-06
Teen	2.14E-05	4.08E-05	2.86E-06	0.00E+00	2.67E-05	0.00E+00	7.52E-05
Child	2.77E-05	4.00E-05	3.70E-06	0.00E+00	2.43E-05	0.00E+00	2.52E-03
Infant	5.98E-07	1.08E-06	8.01E-08	0.00E+00	4.47E-07	0.00E+00	8.78E-05

Dose factor - liquid release pathway (mrem/Ci released)							
Zn-69m							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.25E-04	7.79E-04	7.12E-05	0.00E+00	4.72E-04	0.00E+00	4.76E-02
Teen	3.50E-04	8.25E-04	7.57E-05	0.00E+00	5.01E-04	0.00E+00	4.53E-02
Child	4.49E-04	7.65E-04	9.04E-05	0.00E+00	4.44E-04	0.00E+00	2.49E-02
Infant	9.61E-06	1.96E-05	1.79E-06	0.00E+00	7.94E-06	0.00E+00	2.72E-04

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Br-82							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	0.00E+00	1.39E-03	0.00E+00	0.00E+00	0.00E+00	1.59E-03
Teen	0.00E+00	0.00E+00	1.47E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Child	0.00E+00	0.00E+00	1.71E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Infant	0.00E+00	0.00E+00	4.43E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Dose factor - liquid release pathway (mrem/Ci released)							
Br-83							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	0.00E+00	9.06E-07	0.00E+00	0.00E+00	0.00E+00	1.30E-06
Teen	0.00E+00	0.00E+00	9.85E-07	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Child	0.00E+00	0.00E+00	1.27E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Infant	0.00E+00	0.00E+00	2.93E-11	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Dose factor - liquid release pathway (mrem/Ci released)							
Br-84							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	0.00E+00	3.12E-05	0.00E+00	0.00E+00	0.00E+00	2.44E-10
Teen	0.00E+00	0.00E+00	3.43E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Child	0.00E+00	0.00E+00	4.33E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Infant	0.00E+00	0.00E+00	1.20E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Dose factor - liquid release pathway (mrem/Ci released)							
Br-85							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	0.00E+00	4.24E-82	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Teen	0.00E+00	0.00E+00	4.60E-82	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Child	0.00E+00	0.00E+00	5.94E-82	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Infant	0.00E+00	0.00E+00	9.35E-309	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Dose factor - liquid release pathway (mrem/Ci released)							
Rb-86							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	7.36E-02	3.43E-02	0.00E+00	0.00E+00	0.00E+00	1.45E-02
Teen	0.00E+00	7.98E-02	3.75E-02	0.00E+00	0.00E+00	0.00E+00	1.18E-02
Child	0.00E+00	7.93E-02	4.88E-02	0.00E+00	0.00E+00	0.00E+00	5.10E-03
Infant	0.00E+00	9.07E-03	4.48E-03	0.00E+00	0.00E+00	0.00E+00	2.32E-04

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Rb-88							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	1.41E-16	7.46E-17	0.00E+00	0.00E+00	0.00E+00	1.94E-27
Teen	0.00E+00	1.51E-16	8.04E-17	0.00E+00	0.00E+00	0.00E+00	1.29E-23
Child	0.00E+00	1.45E-16	1.01E-16	0.00E+00	0.00E+00	0.00E+00	7.12E-18
Infant	0.00E+00	5.68E-54	3.12E-54	0.00E+00	0.00E+00	0.00E+00	5.54E-54

Dose factor - liquid release pathway (mrem/Ci released)							
Rb-89							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	1.28E-18	8.99E-19	0.00E+00	0.00E+00	0.00E+00	7.42E-32
Teen	0.00E+00	1.34E-18	9.45E-19	0.00E+00	0.00E+00	0.00E+00	2.05E-27
Child	0.00E+00	1.23E-18	1.09E-18	0.00E+00	0.00E+00	0.00E+00	1.07E-20
Infant	0.00E+00	1.15E-61	7.93E-62	0.00E+00	0.00E+00	0.00E+00	3.92E-62

Dose factor - liquid release pathway (mrem/Ci released)							
Sr-89							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.26E-02	0.00E+00	6.48E-04	0.00E+00	0.00E+00	0.00E+00	3.62E-03
Teen	2.43E-02	0.00E+00	6.95E-04	0.00E+00	0.00E+00	0.00E+00	2.89E-03
Child	4.27E-02	0.00E+00	1.22E-03	0.00E+00	0.00E+00	0.00E+00	1.65E-03
Infant	2.58E-02	0.00E+00	7.40E-04	0.00E+00	0.00E+00	0.00E+00	5.30E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Sr-90							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	5.63E-01	0.00E+00	1.38E-01	0.00E+00	0.00E+00	0.00E+00	1.63E-02
Teen	4.64E-01	0.00E+00	1.15E-01	0.00E+00	0.00E+00	0.00E+00	1.30E-02
Child	5.59E-01	0.00E+00	1.42E-01	0.00E+00	0.00E+00	0.00E+00	7.53E-03
Infant	1.95E-01	0.00E+00	4.97E-02	0.00E+00	0.00E+00	0.00E+00	2.44E-03

Dose factor - liquid release pathway (mrem/Ci released)							
Sr-91							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.27E-04	0.00E+00	5.14E-06	0.00E+00	0.00E+00	0.00E+00	6.05E-04
Teen	1.38E-04	0.00E+00	5.51E-06	0.00E+00	0.00E+00	0.00E+00	6.24E-04
Child	1.83E-04	0.00E+00	6.91E-06	0.00E+00	0.00E+00	0.00E+00	4.04E-04
Infant	1.59E-05	0.00E+00	5.76E-07	0.00E+00	0.00E+00	0.00E+00	1.88E-05

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Sr-92							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	5.21E-06	0.00E+00	2.26E-07	0.00E+00	0.00E+00	0.00E+00	1.03E-04
Teen	5.64E-06	0.00E+00	2.42E-07	0.00E+00	0.00E+00	0.00E+00	1.44E-04
Child	7.20E-06	0.00E+00	2.89E-07	0.00E+00	0.00E+00	0.00E+00	1.36E-04
Infant	9.41E-10	0.00E+00	3.50E-11	0.00E+00	0.00E+00	0.00E+00	1.01E-08

Dose factor - liquid release pathway (mrem/Ci released)							
Y-90							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	4.85E-07	0.00E+00	1.30E-08	0.00E+00	0.00E+00	0.00E+00	5.15E-03
Teen	5.16E-07	0.00E+00	1.40E-08	0.00E+00	0.00E+00	0.00E+00	4.26E-03
Child	8.67E-07	0.00E+00	2.32E-08	0.00E+00	0.00E+00	0.00E+00	2.47E-03
Infant	4.80E-07	0.00E+00	1.29E-08	0.00E+00	0.00E+00	0.00E+00	6.63E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Y-91							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	9.20E-06	0.00E+00	2.53E-07	0.00E+00	0.00E+00	0.00E+00	5.06E-03
Teen	9.68E-06	0.00E+00	2.97E-07	0.00E+00	0.00E+00	0.00E+00	3.97E-03
Child	1.74E-05	0.00E+00	4.74E-07	0.00E+00	0.00E+00	0.00E+00	2.32E-03
Infant	1.03E-05	0.00E+00	2.73E-07	0.00E+00	0.00E+00	0.00E+00	7.35E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Y-91m							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.71E-13	0.00E+00	5.10E-14	0.00E+00	0.00E+00	0.00E+00	5.02E-13
Teen	1.85E-13	0.00E+00	2.55E-13	0.00E+00	0.00E+00	0.00E+00	8.72E-12
Child	2.36E-13	0.00E+00	6.04E-14	0.00E+00	0.00E+00	0.00E+00	4.62E-10
Infant	2.62E-26	0.00E+00	8.92E-28	0.00E+00	0.00E+00	0.00E+00	8.72E-23

Dose factor - liquid release pathway (mrem/Ci released)							
Y-92							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.51E-09	0.00E+00	2.88E-10	0.00E+00	0.00E+00	0.00E+00	6.15E-05
Teen	3.83E-09	0.00E+00	1.15E-09	0.00E+00	0.00E+00	0.00E+00	1.05E-04
Child	4.92E-09	0.00E+00	3.57E-10	0.00E+00	0.00E+00	0.00E+00	1.42E-04
Infant	5.88E-12	0.00E+00	1.65E-13	0.00E+00	0.00E+00	0.00E+00	1.12E-07

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)

Y-93

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	5.32E-08	0.00E+00	2.33E-09	0.00E+00	0.00E+00	0.00E+00	1.69E-03
Teen	5.77E-08	0.00E+00	6.38E-09	0.00E+00	0.00E+00	0.00E+00	1.76E-03
Child	7.75E-08	0.00E+00	3.13E-09	0.00E+00	0.00E+00	0.00E+00	1.16E-03
Infant	8.33E-09	0.00E+00	2.27E-10	0.00E+00	0.00E+00	0.00E+00	6.58E-05

Dose factor - liquid release pathway (mrem/Ci released)

Zr-95

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.23E-06	3.94E-07	1.79E-06	0.00E+00	6.19E-07	0.00E+00	1.25E-03
Teen	1.11E-06	3.52E-07	8.74E-06	0.00E+00	5.17E-07	0.00E+00	8.11E-04
Child	2.48E-06	5.45E-07	2.26E-06	0.00E+00	7.80E-07	0.00E+00	5.69E-04
Infant	1.87E-06	4.56E-07	3.23E-07	0.00E+00	4.91E-07	0.00E+00	2.27E-04

Dose factor - liquid release pathway (mrem/Ci released)

Zr-97

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.07E-08	2.16E-09	1.23E-08	0.00E+00	3.27E-09	0.00E+00	6.70E-04
Teen	1.11E-08	2.19E-09	6.42E-08	0.00E+00	3.33E-09	0.00E+00	5.94E-04
Child	2.21E-08	3.19E-09	1.51E-08	0.00E+00	4.58E-09	0.00E+00	4.83E-04
Infant	1.92E-08	3.29E-09	1.50E-09	0.00E+00	3.32E-09	0.00E+00	2.10E-04

Dose factor - liquid release pathway (mrem/Ci released)

Nb-95

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.23E-04	1.79E-04	9.73E-05	0.00E+00	1.77E-04	0.00E+00	1.09E+00
Teen	3.25E-04	1.80E-04	1.04E-04	0.00E+00	1.75E-04	0.00E+00	7.70E-01
Child	3.84E-04	1.49E-04	1.08E-04	0.00E+00	1.40E-04	0.00E+00	2.76E-01
Infant	5.36E-07	2.21E-07	1.28E-07	0.00E+00	1.58E-07	0.00E+00	1.86E-04

Dose factor - liquid release pathway (mrem/Ci released)

Nb-97

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.69E-09	6.81E-10	2.51E-10	0.00E+00	7.95E-10	0.00E+00	2.51E-06
Teen	2.90E-09	7.20E-10	2.73E-10	0.00E+00	8.41E-10	0.00E+00	1.72E-05
Child	3.68E-09	6.65E-10	3.12E-10	0.00E+00	7.38E-10	0.00E+00	2.05E-04
Infant	5.81E-21	1.24E-10	4.47E-22	0.00E+00	9.68E-22	0.00E+00	3.91E-16

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)

Mo-99

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	0.00E+00	1.49E-04	2.84E-05	0.00E+00	3.38E-04	0.00E+00	3.46E-04
Teen	0.00E+00	1.76E-04	3.36E-05	0.00E+00	4.03E-04	0.00E+00	3.15E-04
Child	0.00E+00	2.79E-04	6.91E-05	0.00E+00	5.96E-04	0.00E+00	2.31E-04
Infant	0.00E+00	4.38E-04	8.54E-05	0.00E+00	6.54E-04	0.00E+00	1.44E-04

Dose factor - liquid release pathway (mrem/Ci released)

Tc-99m

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.68E-09	4.74E-09	6.07E-08	0.00E+00	7.20E-08	2.32E-09	2.81E-06
Teen	1.74E-09	4.86E-09	6.46E-08	0.00E+00	7.24E-08	2.70E-09	3.19E-06
Child	2.19E-09	4.29E-09	7.15E-08	0.00E+00	6.24E-08	2.18E-09	2.44E-06
Infant	3.78E-10	7.79E-10	1.00E-08	0.00E+00	8.38E-09	4.07E-10	2.26E-07

Dose factor - liquid release pathway (mrem/Ci released)

Tc-101

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.60E-24	5.19E-24	5.10E-23	0.00E+00	9.34E-23	2.65E-24	1.56E-35
Teen	3.89E-24	5.53E-24	5.49E-23	0.00E+00	1.00E-22	3.37E-24	9.45E-31
Child	4.98E-24	5.22E-24	6.63E-23	0.00E+00	8.90E-23	2.76E-24	1.66E-23
Infant	9.73E-69	1.23E-68	1.21E-67	0.00E+00	1.46E-67	6.69E-69	2.08E-66

Dose factor - liquid release pathway (mrem/Ci released)

Ru-103

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.47E-05	0.00E+00	1.56E-05	0.00E+00	1.32E-04	0.00E+00	4.05E-03
Teen	2.96E-05	0.00E+00	1.64E-05	0.00E+00	1.04E-04	0.00E+00	2.47E-03
Child	5.53E-05	0.00E+00	2.20E-05	0.00E+00	1.39E-04	0.00E+00	1.43E-03
Infant	1.33E-05	0.00E+00	4.43E-06	0.00E+00	2.76E-05	0.00E+00	1.61E-04

Dose factor - liquid release pathway (mrem/Ci released)

Ru-105

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	4.13E-08	0.00E+00	1.75E-08	0.00E+00	5.34E-07	0.00E+00	2.53E-05
Teen	4.45E-08	0.00E+00	2.42E-08	0.00E+00	5.62E-07	0.00E+00	3.59E-05
Child	5.71E-08	0.00E+00	2.22E-08	0.00E+00	5.02E-07	0.00E+00	3.73E-05
Infant	6.98E-10	0.00E+00	2.35E-10	0.00E+00	5.13E-09	0.00E+00	2.78E-07

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Ru-106							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	6.71E-04	0.00E+00	8.76E-05	0.00E+00	1.30E-03	0.00E+00	4.34E-02
Teen	5.86E-04	0.00E+00	8.85E-05	0.00E+00	1.13E-03	0.00E+00	2.81E-02
Child	1.13E-03	0.00E+00	1.44E-04	0.00E+00	1.53E-03	0.00E+00	1.76E-02
Infant	2.23E-04	0.00E+00	2.78E-05	0.00E+00	2.63E-04	0.00E+00	1.69E-03

Dose factor - liquid release pathway (mrem/Ci released)							
Rh-105							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.35E-06	2.45E-06	1.62E-06	0.00E+00	1.04E-05	0.00E+00	3.90E-04
Teen	4.10E-06	2.96E-06	1.97E-06	0.00E+00	1.26E-05	0.00E+00	3.77E-04
Child	8.43E-06	4.52E-06	3.88E-06	0.00E+00	1.80E-05	0.00E+00	2.80E-04
Infant	1.08E-05	7.05E-06	4.74E-06	0.00E+00	1.96E-05	0.00E+00	1.75E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Ag-110m							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.06E-05	2.83E-05	3.83E-05	0.00E+00	5.56E-05	0.00E+00	1.15E-02
Teen	3.74E-05	3.54E-05	1.41E-04	0.00E+00	6.75E-05	0.00E+00	9.94E-03
Child	6.78E-05	4.58E-05	6.17E-05	0.00E+00	8.53E-05	0.00E+00	5.45E-03
Infant	8.87E-05	6.47E-05	4.28E-05	0.00E+00	9.26E-05	0.00E+00	3.36E-03

Sn-113 and Sn-117m - liquid release pathway (mrem/Ci released)							
	Bone	Liver	W. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	6.40E-03	2.17E-04	6.78E-04	1.26E-04	0.00E+00	0.00E+00	1.32E-01
Teen	6.96E-03	2.33E-04	7.33E-04	1.28E-04	0.00E+00	0.00E+00	1.08E-01
Child	9.03E-03	2.28E-04	9.44E-04	1.66E-04	0.00E+00	0.00E+00	4.61E-02
Infant	1.42E-04	4.43E-06	1.47E-05	3.07E-06	0.00E+00	0.00E+00	3.50E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Sb-124							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	5.42E-04	1.02E-05	2.21E-04	1.32E-06	0.00E+00	4.22E-04	1.54E-02
Teen	5.66E-04	1.04E-05	2.53E-04	1.28E-06	0.00E+00	4.94E-04	1.14E-02
Child	7.89E-04	1.02E-05	2.83E-04	1.74E-06	0.00E+00	4.38E-04	4.94E-03
Infant	1.95E-04	2.86E-06	6.03E-05	5.17E-07	0.00E+00	1.22E-04	6.00E-04

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Sb-125							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.49E-04	3.90E-06	1.07E-04	3.55E-07	0.00E+00	2.69E-04	3.85E-03
Teen	3.65E-04	3.99E-06	2.19E-04	3.49E-07	0.00E+00	3.21E-04	2.84E-03
Child	5.14E-04	3.96E-06	1.35E-04	4.76E-07	0.00E+00	2.86E-04	1.23E-03
Infant	1.14E-04	1.11E-06	2.35E-05	1.43E-07	0.00E+00	7.17E-05	1.52E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Te-125m							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.30E-04	1.20E-04	4.43E-05	9.93E-05	1.34E-03	0.00E+00	1.32E-03
Teen	3.36E-04	1.21E-04	4.53E-05	9.39E-05	0.00E+00	0.00E+00	9.92E-04
Child	5.74E-04	1.56E-04	7.67E-05	1.61E-04	0.00E+00	0.00E+00	5.54E-04
Infant	2.47E-04	8.27E-05	3.35E-05	8.33E-05	0.00E+00	0.00E+00	1.18E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Te-127							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.15E-05	1.13E-05	6.83E-06	2.34E-05	1.28E-04	0.00E+00	2.49E-03
Teen	3.45E-05	1.22E-05	7.43E-06	2.38E-05	1.40E-04	0.00E+00	2.67E-03
Child	4.45E-05	1.20E-05	9.54E-06	3.08E-05	1.27E-04	0.00E+00	1.74E-03
Infant	3.10E-07	1.04E-07	6.67E-08	2.52E-07	7.56E-07	0.00E+00	6.51E-06

Dose factor - liquid release pathway (mrem/Ci released)							
Te-127m							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	8.63E-04	3.08E-04	1.05E-04	2.21E-04	3.51E-03	0.00E+00	2.89E-03
Teen	8.74E-04	3.10E-04	1.04E-04	2.08E-04	3.54E-03	0.00E+00	2.18E-03
Child	1.50E-03	4.05E-04	1.79E-04	3.60E-04	4.29E-03	0.00E+00	1.22E-03
Infant	6.28E-04	2.08E-04	7.61E-05	1.82E-04	1.55E-03	0.00E+00	2.54E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Te-129							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.68E-08	6.32E-09	4.10E-09	1.29E-08	7.07E-08	0.00E+00	1.27E-08
Teen	1.83E-08	6.82E-09	4.45E-09	1.31E-08	7.68E-08	0.00E+00	1.00E-07
Child	2.36E-08	6.58E-09	5.60E-09	1.68E-08	6.90E-08	0.00E+00	1.47E-06
Infant	1.08E-18	3.73E-19	2.53E-19	9.07E-19	2.69E-18	0.00E+00	8.65E-17

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Te-129m							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.35E-03	5.04E-04	2.14E-04	4.64E-04	5.63E-03	0.00E+00	6.80E-03
Teen	1.37E-03	5.10E-04	2.18E-04	4.43E-04	5.75E-03	0.00E+00	5.16E-03
Child	2.34E-03	6.54E-04	3.64E-04	7.55E-04	6.88E-03	0.00E+00	2.86E-03
Infant	1.04E-03	3.58E-04	1.61E-04	4.01E-04	2.61E-03	0.00E+00	6.23E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Te-131m							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.04E-04	5.08E-05	4.24E-05	8.05E-05	5.15E-04	0.00E+00	5.05E-03
Teen	1.11E-04	5.34E-05	4.49E-05	8.03E-05	5.56E-04	0.00E+00	4.28E-03
Child	1.63E-04	5.63E-05	6.00E-05	1.16E-04	5.45E-04	0.00E+00	2.28E-03
Infant	5.46E-05	2.20E-05	1.81E-05	4.45E-05	1.51E-04	0.00E+00	3.70E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Te-131							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.97E-15	1.24E-15	9.40E-16	2.44E-15	1.30E-14	0.00E+00	4.21E-16
Teen	3.21E-15	1.32E-15	1.01E-15	2.47E-15	1.40E-14	0.00E+00	2.63E-16
Child	4.12E-15	1.25E-15	1.23E-15	3.15E-15	1.24E-14	0.00E+00	2.16E-14
Infant	4.22E-41	1.56E-41	1.18E-41	3.77E-41	1.08E-40	0.00E+00	1.71E-39

Dose factor - liquid release pathway (mrem/Ci released)							
Te-132							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.96E-04	1.26E-04	1.19E-04	1.40E-04	1.22E-03	0.00E+00	5.98E-03
Teen	2.05E-04	1.30E-04	1.22E-04	1.37E-04	1.24E-03	0.00E+00	4.11E-03
Child	3.15E-04	1.39E-04	1.69E-04	2.03E-04	1.29E-03	0.00E+00	1.40E-03
Infant	1.48E-04	7.32E-05	6.83E-05	1.08E-04	4.58E-04	0.00E+00	2.71E-04

Dose factor - liquid release pathway (mrem/Ci released)							
I-131							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.09E-04	2.99E-04	1.71E-04	9.78E-02	5.12E-04	0.00E+00	7.88E-05
Teen	2.41E-04	3.37E-04	1.81E-04	9.83E-02	5.80E-04	0.00E+00	6.66E-05
Child	4.90E-04	4.93E-04	2.80E-04	1.63E-01	8.09E-04	0.00E+00	4.39E-05
Infant	5.71E-04	6.73E-04	2.96E-04	2.21E-01	7.86E-04	0.00E+00	2.40E-05

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
I-132							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.43E-07	3.81E-07	1.34E-07	1.33E-05	6.07E-07	0.00E+00	7.16E-08
Teen	1.49E-07	3.90E-07	1.41E-07	1.32E-05	6.15E-07	0.00E+00	1.70E-07
Child	1.85E-07	3.39E-07	1.56E-07	1.57E-05	5.19E-07	0.00E+00	3.99E-07
Infant	1.64E-11	3.32E-11	1.18E-11	1.56E-09	3.71E-11	0.00E+00	2.69E-11

Dose factor - liquid release pathway (mrem/Ci released)							
I-133							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.33E-05	5.80E-05	1.77E-05	8.52E-03	1.01E-04	0.00E+00	5.21E-05
Teen	3.74E-05	6.34E-05	1.94E-05	8.85E-03	1.11E-04	0.00E+00	4.80E-05
Child	6.27E-05	7.75E-05	2.94E-05	1.44E-02	1.29E-04	0.00E+00	3.13E-05
Infant	4.77E-05	6.95E-05	2.04E-05	1.26E-02	8.17E-05	0.00E+00	1.18E-05

Dose factor - liquid release pathway (mrem/Ci released)							
I-134							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.09E-10	5.69E-10	2.04E-10	9.85E-09	9.04E-10	0.00E+00	4.96E-13
Teen	2.20E-10	5.82E-10	2.10E-10	9.70E-09	9.18E-10	0.00E+00	7.67E-12
Child	2.72E-10	5.05E-10	2.33E-10	1.16E-08	7.72E-10	0.00E+00	3.35E-10
Infant	5.37E-22	1.10E-21	3.91E-22	2.56E-20	1.23E-21	0.00E+00	1.14E-21

Dose factor - liquid release pathway (mrem/Ci released)							
I-135							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.37E-06	8.83E-06	3.26E-06	5.82E-04	1.42E-05	0.00E+00	9.97E-06
Teen	3.55E-06	9.14E-06	3.41E-06	5.88E-04	1.44E-05	0.00E+00	1.01E-05
Child	4.54E-06	8.17E-06	3.87E-06	7.24E-04	1.25E-05	0.00E+00	6.23E-06
Infant	4.48E-07	8.92E-07	3.25E-07	7.99E-05	9.94E-07	0.00E+00	3.23E-07

Dose factor - liquid release pathway (mrem/Ci released)							
Cs-134							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.19E-01	5.21E-01	4.26E-01	0.00E+00	1.69E-01	5.60E-02	9.12E-03
Teen	2.25E-01	5.30E-01	2.46E-01	0.00E+00	1.68E-01	6.43E-02	6.59E-03
Child	2.76E-01	4.52E-01	9.55E-02	0.00E+00	1.40E-01	5.03E-02	2.44E-03
Infant	1.07E-02	2.00E-02	2.02E-03	0.00E+00	5.16E-03	2.11E-03	5.44E-05

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Cs-134m							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	4.21E-06	8.85E-06	4.52E-06	0.00E+00	4.80E-06	7.56E-07	3.12E-06
Teen	4.42E-06	9.16E-06	4.71E-06	0.00E+00	5.10E-06	8.95E-07	6.0E-06
Child	5.48E-06	8.11E-06	5.29E-06	0.00E+00	4.28E-06	7.07E-07	1.03E-05
Infant	5.19E-11	8.64E-11	4.37E-11	0.00E+00	3.33E-11	7.67E-12	6.84E-11

Dose factor - liquid release pathway (mrem/Ci released)							
Cs-136							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.23E-02	8.81E-02	6.34E-02	0.00E+00	4.90E-02	6.72E-03	1.00E-02
Teen	2.25E-02	8.85E-02	5.95E-02	0.00E+00	4.82E-02	7.59E-03	7.12E-03
Child	2.69E-02	7.40E-02	4.79E-02	0.00E+00	3.94E-02	5.87E-03	2.60E-03
Infant	1.18E-03	3.47E-03	1.29E-03	0.00E+00	1.38E-03	2.83E-04	5.27E-05

Dose factor - liquid release pathway (mrem/Ci released)							
Cs-137							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.81E-01	3.84E-01	2.52E-01	0.00E+00	1.30E-01	4.33E-02	7.43E-03
Teen	3.02E-01	4.01E-01	1.40E-01	0.00E+00	1.36E-01	5.30E-02	5.71E-03
Child	3.85E-01	3.69E-01	5.45E-02	0.00E+00	1.20E-01	4.33E-02	2.31E-03
Infant	1.49E-02	1.74E-02	1.24E-03	0.00E+00	4.68E-03	1.89E-03	5.45E-05

Dose factor - liquid release pathway (mrem/Ci released)							
Cs-138							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.57E-11	7.04E-11	3.49E-11	0.00E+00	5.18E-11	5.11E-12	3.00E-16
Teen	3.82E-11	7.34E-11	3.67E-11	0.00E+00	5.42E-11	6.30E-12	3.33E-14
Child	4.84E-11	6.73E-11	4.27E-11	0.00E+00	4.73E-11	5.10E-12	3.10E-11
Infant	1.63E-32	2.65E-32	1.28E-32	0.00E+00	1.32E-32	2.06E-33	4.23E-32

Dose factor - liquid release pathway (mrem/Ci released)							
Ba-139							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.67E-09	1.19E-12	4.93E-11	0.00E+00	1.12E-12	6.77E-13	2.97E-09
Teen	1.83E-09	1.29E-12	5.50E-11	0.00E+00	1.21E-12	8.87E-13	1.63E-08
Child	2.35E-09	1.25E-12	6.84E-11	0.00E+00	1.09E-12	7.37E-13	1.36E-07
Infant	3.30E-16	2.19E-19	9.55E-18	0.00E+00	1.31E-19	1.33E-19	2.09E-14

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)

Ba-140

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	5.34E-04	6.71E-07	3.51E-05	0.00E+00	2.28E-07	3.84E-07	1.10E-03
Teen	5.41E-04	6.63E-07	3.56E-05	0.00E+00	2.25E-07	4.46E-07	8.35E-04
Child	1.32E-03	1.16E-06	7.72E-05	0.00E+00	3.76E-07	6.89E-07	6.69E-04
Infant	1.52E-03	1.52E-06	7.84E-05	0.00E+00	3.61E-07	9.34E-07	3.74E-04

Dose factor - liquid release pathway (mrem/Ci released)

Ba-141

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	4.57E-19	3.45E-22	1.63E-20	0.00E+00	3.21E-22	1.96E-22	2.15E-28
Teen	4.96E-19	3.70E-22	2.14E-20	0.00E+00	3.44E-22	2.53E-22	1.06E-24
Child	6.37E-19	3.57E-22	2.18E-20	0.00E+00	3.09E-22	2.10E-21	3.63E-19
Infant	1.58E-53	1.08E-56	4.99E-55	0.00E+00	6.52E-57	6.60E-57	1.93E-52

Dose factor - liquid release pathway (mrem/Ci released)

La-140

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.66E-08	1.84E-08	1.03E-07	0.00E+00	0.00E+00	0.00E+00	1.35E-03
Teen	3.68E-08	1.81E-08	5.51E-07	0.00E+00	0.00E+00	0.00E+00	1.04E-03
Child	8.21E-08	2.87E-08	1.24E-07	0.00E+00	0.00E+00	0.00E+00	8.00E-04
Infant	8.56E-08	3.38E-08	8.69E-09	0.00E+00	0.00E+00	0.00E+00	3.97E-04

Dose factor - liquid release pathway (mrem/Ci released)

La-142

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.92E-11	1.33E-11	4.94E-11	0.00E+00	0.00E+00	0.00E+00	9.71E-08
Teen	3.12E-11	1.38E-11	2.61E-10	0.00E+00	0.00E+00	0.00E+00	4.21E-07
Child	3.93E-11	1.25E-11	5.77E-11	0.00E+00	0.00E+00	0.00E+00	2.48E-06
Infant	7.74E-18	2.84E-18	6.81E-19	0.00E+00	0.00E+00	0.00E+00	4.83E-13

Dose factor - liquid release pathway (mrem/Ci released)

Ce-141

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.05E-07	1.39E-07	2.42E-07	0.00E+00	6.45E-08	0.00E+00	5.31E-04
Teen	2.06E-07	1.37E-07	4.88E-07	0.00E+00	6.47E-08	0.00E+00	3.93E-04
Child	5.80E-07	2.89E-07	1.42E-07	0.00E+00	1.27E-07	0.00E+00	3.61E-04
Infant	7.11E-07	4.34E-07	5.11E-08	0.00E+00	1.34E-07	0.00E+00	2.24E-04

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Ce-143							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.47E-08	1.09E-05	1.78E-08	0.00E+00	4.78E-09	0.00E+00	4.06E-04
Teen	1.49E-08	1.08E-05	9.40E-08	0.00E+00	4.86E-09	0.00E+00	3.26E-04
Child	4.01E-08	2.17E-05	2.25E-08	0.00E+00	9.12E-09	0.00E+00	3.18E-04
Infant	5.10E-08	3.38E-05	3.86E-09	0.00E+00	9.85E-09	0.00E+00	1.97E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Ce-144							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.12E-05	4.67E-06	1.04E-06	0.00E+00	2.77E-06	0.00E+00	3.78E-03
Teen	1.12E-05	4.65E-06	3.03E-06	0.00E+00	2.78E-06	0.00E+00	2.82E-03
Child	3.17E-05	9.92E-06	2.20E-06	0.00E+00	5.50E-06	0.00E+00	2.59E-03
Infant	2.80E-05	1.15E-05	1.57E-06	0.00E+00	4.63E-06	0.00E+00	1.61E-03

Dose factor - liquid release pathway (mrem/Ci released)							
Pr-143							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	5.69E-07	2.28E-07	2.82E-08	0.00E+00	1.32E-07	0.00E+00	2.49E-03
Teen	6.00E-07	2.40E-07	2.99E-08	0.00E+00	1.39E-07	0.00E+00	1.97E-03
Child	1.07E-06	3.21E-07	5.31E-08	0.00E+00	1.74E-07	0.00E+00	1.15E-03
Infant	6.81E-07	2.55E-07	3.38E-08	0.00E+00	9.47E-08	0.00E+00	3.60E-04

Dose factor - liquid release pathway (mrem/Ci released)							
Pr-144							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.76E-22	1.56E-22	2.24E-23	0.00E+00	8.80E-23	0.00E+00	5.41E-29
Teen	4.09E-22	1.67E-22	3.91E-23	0.00E+00	9.61E-23	0.00E+00	4.51E-25
Child	5.29E-22	1.64E-22	3.05E-23	0.00E+00	8.66E-23	0.00E+00	3.52E-19
Infant	1.72E-59	6.66E-60	8.67E-61	0.00E+00	2.41E-60	0.00E+00	3.10E-55

Dose factor - liquid release pathway (mrem/Ci released)							
Nd-147							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.82E-07	4.42E-07	1.13E-07	0.00E+00	2.58E-07	0.00E+00	2.12E-03
Teen	4.23E-07	4.60E-07	5.09E-07	0.00E+00	2.70E-07	0.00E+00	1.66E-03
Child	7.45E-07	6.03E-07	1.47E-07	0.00E+00	3.31E-07	0.00E+00	9.55E-04
Infant	4.53E-07	4.65E-07	2.85E-08	0.00E+00	1.79E-07	0.00E+00	2.95E-04

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)

Eu-152

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.31E-05	2.99E-04	1.63E-04	0.00E+00	1.85E-05	0.00E+00	1.72E-03
Teen	1.21E-05	2.92E-06	9.00E-04	0.00E+00	1.35E-05	0.00E+00	1.07E-03
Child	1.84E-05	3.34E-06	1.91E-04	0.00E+00	1.41E-05	0.00E+00	5.49E-04
Infant	6.27E-06	1.67E-06	1.40E-06	0.00E+00	4.67E-06	0.00E+00	1.48E-04

Dose factor - liquid release pathway (mrem/Ci released)

W-187

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	1.52E-04	1.27E-04	4.45E-05	0.00E+00	0.00E+00	0.00E+00	4.17E-02
Teen	1.65E-04	1.34E-04	4.71E-05	0.00E+00	0.00E+00	0.00E+00	3.63E-02
Child	2.09E-04	1.24E-04	5.57E-05	0.00E+00	0.00E+00	0.00E+00	1.74E-02
Infant	2.25E-06	1.57E-06	5.41E-07	0.00E+00	0.00E+00	0.00E+00	9.21E-05

Dose factor - liquid release pathway (mrem/Ci released)

Np-239

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.15E-08	3.09E-09	2.30E-08	0.00E+00	9.65E-09	0.00E+00	6.34E-04
Teen	3.42E-08	3.22E-09	1.21E-07	0.00E+00	1.01E-08	0.00E+00	5.19E-04
Child	6.77E-08	4.86E-09	2.83E-08	0.00E+00	1.41E-08	0.00E+00	3.60E-04
Infant	5.72E-08	5.12E-09	2.89E-09	0.00E+00	1.02E-08	0.00E+00	1.48E-04

Dose factor - liquid release pathway (mrem/Ci released)

U-235

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	3.05E-02	0.00E+00	1.89E-03	0.00E+00	7.13E-03	0.00E+00	2.98E-03
Teen	3.17E-02	0.00E+00	2.13E-03	0.00E+00	7.43E-03	0.00E+00	2.30E-03
Child	6.92E-02	0.00E+00	4.23E-03	0.00E+00	1.14E-02	0.00E+00	1.63E-03
Infant	4.42E-02	0.00E+00	3.37E-03	0.00E+00	9.40E-03	0.00E+00	7.67E-04

Dose factor - liquid release pathway (mrem/Ci released)

U-238

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	2.92E-02	0.00E+00	1.73E-03	0.00E+00	6.67E-03	0.00E+00	2.10E-03
Teen	3.03E-02	0.00E+00	1.81E-03	0.00E+00	6.96E-03	0.00E+00	1.62E-03
Child	6.62E-02	0.00E+00	3.93E-03	0.00E+00	1.06E-02	0.00E+00	1.15E-03
Infant	4.23E-02	0.00E+00	3.15E-03	0.00E+00	8.78E-03	0.00E+00	5.41E-04

Table 5.1-1

Dose factor - liquid release pathway (mrem/Ci released)							
Am-241							
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI
Adult	5.25E-02	1.85E-02	3.47E-03	0.00E+00	2.61E-02	0.00E+00	4.75E-03
Teen	4.10E-02	1.56E-02	2.77E-03	0.00E+00	2.05E-02	0.00E+00	3.74E-03
Child	4.10E-02	1.83E-02	2.93E-03	0.00E+00	1.79E-02	0.00E+00	2.19E-03
Infant	1.42E-02	6.68E-03	1.01E-03	0.00E+00	6.10E-03	0.00E+00	7.17E-04

5.1.2 Atmospheric Release Mode: Radioiodine, Tritium, and Particulates

The dose calculations for demonstration of compliance with the 10 CFR 50, Appendix I dose limits for radioiodines, tritium, and particulate radionuclides released to the atmosphere will be done in the manner similar to the liquid release dose calculations described in Section 5.1.1. The total dose is compared to the corresponding atmospheric release mode Appendix I dose limit for the organ in question.

The doses are calculated using the following formula:

$$API = \Sigma\ Dose_{aomi} = \Sigma\ (TDF_{aomi}\ X\ C_i) \leq K_{om}\ \text{mrem}$$

Where

API = the Appendix I dose for compliance evaluations in mrem

$Dose_{aomi}$ = the dose to the specific age group (a) and organ (o) via release mode (m) from radionuclide (i)

TDF_{aomi} = total dose factor for the specific age group (a) and organ (o) via release mode (m) from radionuclide (i) from Table 5.1-2 in mrem/Ci

C_i = curies of radionuclide (i) released

K_{om} = the Appendix I dose limit for organ (o) and release mode (m) for which the calculation is being made.

The methodology and the values used to obtain the TDF_{aomi} values are given in Appendix C.

It is recognized that some of the release quantities may not be available at the end of the month because the samples from these release paths are sent to a vendor for analysis. Usually, the only radionuclides affected by these delays are Sr-89 and Sr-90. Because the quantities of these two radionuclides are but a small fraction of the total release, the absence of their dose contributions from the initial monthly dose calculation will not significantly affect the total dose obtained from the remaining radionuclides. The dose for the month will be updated upon the receipt of the vendor isotopic results and upon the receipt of any corrections to previous release quantities.

Instead of using the precalculated total dose factors, the Appendix I dose calculation may be modified to reflect the actual χ/Q during the release period using the methodology of Appendix C.

TABLE 5.1-2
AIRBORNE EFFLUENT DOSE FACTOR

Summations of dose per curie released were made for calculations over the pathways: ingestion of produce, leafy vegetables, milk, meat; inhalation of airborne radionuclides, and direct exposure to deposited radioactivity.

Dose factor - airborne release pathway (mrem/Ci released)

H-3

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	2.34E-04	2.34E-04	2.34E-04	2.34E-04	2.34E-04	2.34E-04	0.00E+00
Teen	0.00E+00	2.69E-04	2.69E-04	2.69E-04	2.69E-04	2.69E-04	2.69E-04	0.00E+00
Child	0.00E+00	3.93E-04	3.93E-04	3.93E-04	3.93E-04	3.93E-04	3.93E-04	0.00E+00
Infant	0.00E+00	1.73E-04	1.73E-04	1.73E-04	1.73E-04	1.73E-04	1.73E-04	0.00E+00

Dose factor - airborne release pathway (mrem/Ci released)

F-18

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.12E-04	0.00E+00	9.61E-04	0.00E+00	0.00E+00	0.00E+00	2.19E-06	2.23E-03
Teen	1.55E-04	0.00E+00	9.65E-04	0.00E+00	0.00E+00	0.00E+00	9.23E-06	2.23E-03
Child	2.06E-04	0.00E+00	9.69E-04	0.00E+00	0.00E+00	0.00E+00	3.70E-05	2.23E-03
Infant	1.63E-04	0.00E+00	9.62E-04	0.00E+00	0.00E+00	0.00E+00	2.53E-05	2.23E-03

Dose factor - airborne release pathway (mrem/Ci released)

Na-22

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.83E+00	4.83E+00	2.89E+01	4.83E+00	4.83E+00	4.83E+00	4.83E+00	3.79E+01
Teen	7.41E+00	7.41E+00	3.15E+01	7.41E+00	7.41E+00	7.41E+00	7.41E+00	3.79E+01
Child	1.50E+01	1.50E+01	3.90E+01	1.50E+01	1.50E+01	1.50E+01	1.50E+01	3.79E+01
Infant	1.81E+01	1.81E+01	4.21E+01	1.81E+01	1.81E+01	1.81E+01	1.81E+01	3.79E+01

Dose factor - airborne release pathway (mrem/Ci released)

Na-24

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	9.48E-04	9.48E-04	1.77E-02	9.48E-04	9.48E-04	9.48E-04	9.48E-04	7.64E-02
Teen	1.36E-03	1.36E-03	1.81E-02	1.36E-03	1.36E-03	1.36E-03	1.36E-03	7.64E-02
Child	2.37E-03	2.37E-03	1.91E-02	2.37E-03	2.37E-03	2.37E-03	2.37E-03	7.64E-02
Infant	3.14E-03	3.14E-03	1.99E-02	3.14E-03	3.14E-03	3.14E-03	3.14E-03	7.64E-02

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Sc-46								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.33E-02	2.59E-02	2.00E+00	0.00E+00	2.42E-02	0.00E+00	2.40E+00	2.69E+00
Teen	1.75E-02	3.41E-02	2.00E+00	0.00E+00	3.26E-02	0.00E+00	2.09E+00	2.69E+00
Child	2.23E-02	3.05E-02	2.00E+00	0.00E+00	2.70E-02	0.00E+00	1.32E+00	2.69E+00
Infant	1.56E-02	2.25E-02	2.00E+00	0.00E+00	1.48E-02	0.00E+00	1.35E-03	2.69E+00

Dose factor - airborne release pathway (mrem/Ci released)								
Mn-54								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	2.32E-01	1.99E+00	0.00E+00	6.89E-02	4.15E-02	7.08E-01	2.28E+00
Teen	0.00E+00	3.34E-01	2.01E+00	0.00E+00	9.95E-02	5.89E-02	6.83E-01	2.28E+00
Child	0.00E+00	4.86E-01	2.07E+00	0.00E+00	1.36E-01	4.68E-02	4.08E-01	2.28E+00
Infant	0.00E+00	2.03E-02	1.95E+00	0.00E+00	4.47E-03	2.97E-02	7.38E-03	2.28E+00

Dose factor - airborne release pathway (mrem/Ci released)								
Cr-51								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	0.00E+00	6.59E-03	2.68E-05	9.86E-06	4.83E-04	1.07E-02	7.73E-03
Teen	0.00E+00	0.00E+00	6.60E-03	3.39E-05	1.34E-05	7.03E-04	9.66E-03	7.73E-03
Child	0.00E+00	0.00E+00	6.66E-03	6.30E-05	1.72E-05	6.14E-04	5.81E-03	7.73E-03
Infant	0.00E+00	0.00E+00	6.58E-03	2.42E-05	5.31E-06	4.25E-04	1.02E-03	7.73E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Mn-56								
	Bone	Liver	T.Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	4.81E-08	1.27E-03	0.00E+00	5.31E-08	2.80E-04	6.01E-04	1.50E-03
Teen	0.00E+00	6.05E-08	1.27E-03	0.00E+00	6.61E-08	4.51E-04	1.70E-03	1.50E-03
Child	0.00E+00	6.26E-08	1.27E-03	0.00E+00	6.58E-08	3.90E-04	3.66E-03	1.50E-03
Infant	0.00E+00	4.57E-08	1.27E-03	0.00E+00	3.27E-08	3.72E-04	2.13E-03	1.50E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Fe-55								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.20E-01	2.21E-01	5.15E-02	0.00E+00	0.00E+00	1.25E-01	1.27E-01	0.00E+00
Teen	3.80E-01	2.70E-01	6.29E-02	0.00E+00	0.00E+00	1.74E-01	1.17E-01	0.00E+00
Child	8.65E-01	4.59E-01	1.42E-01	0.00E+00	0.00E+00	2.62E-01	8.49E-02	0.00E+00
Infant	7.36E-02	4.75E-02	1.27E-02	0.00E+00	0.00E+00	2.56E-02	6.02E-03	0.00E+00

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Fe-59								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	2.01E-01	4.73E-01	5.65E-01	0.00E+00	0.00E+00	1.62E-01	1.58E+00	4.50E-01
Teen	2.25E-01	5.24E-01	5.86E-01	0.00E+00	0.00E+00	2.10E-01	1.24E+00	4.50E-01
Child	4.62E-01	7.48E-01	7.56E-01	0.00E+00	0.00E+00	2.54E-01	7.80E-01	4.50E-01
Infant	6.14E-02	1.07E-01	4.26E-01	0.00E+00	0.00E+00	6.16E-02	5.16E-02	4.50E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Co-57								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	1.17E-02	4.93E-01	0.00E+00	0.00E+00	1.10E-02	2.97E-01	6.13E-01
Teen	0.00E+00	1.59E-02	5.00E-01	0.00E+00	0.00E+00	1.74E-02	2.97E-01	6.13E-01
Child	0.00E+00	2.57E-02	5.26E-01	0.00E+00	0.00E+00	1.50E-02	2.11E-01	6.13E-01
Infant	0.00E+00	4.38E-03	4.81E-01	0.00E+00	0.00E+00	1.13E-02	1.50E-02	6.13E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Co-58								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	3.14E-02	6.02E-01	0.00E+00	0.00E+00	2.75E-02	6.38E-01	6.23E-01
Teen	0.00E+00	4.00E-02	6.24E-01	0.00E+00	0.00E+00	3.99E-02	5.53E-01	6.23E-01
Child	0.00E+00	5.73E-02	7.07E-01	0.00E+00	0.00E+00	3.28E-02	3.35E-01	6.23E-01
Infant	0.00E+00	9.90E-03	5.57E-01	0.00E+00	0.00E+00	2.31E-02	2.49E-02	6.23E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Co-60								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	1.68E-01	3.06E+01	0.00E+00	0.00E+00	1.77E-01	3.16E+00	3.56E+01
Teen	0.00E+00	2.23E-01	3.07E+01	0.00E+00	0.00E+00	2.59E-01	2.90E+00	3.56E+01
Child	0.00E+00	3.28E-01	3.12E+01	0.00E+00	0.00E+00	2.10E-01	1.82E+00	3.56E+01
Infant	0.00E+00	5.86E-02	3.04E+01	0.00E+00	0.00E+00	1.34E-01	1.40E-01	3.56E+01

Dose factor - airborne release pathway (mrem/Ci released)								
Ni-63								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	2.39E+01	1.65E+00	8.00E-01	0.00E+00	0.00E+00	5.29E-03	3.45E-01	0.00E+00
Teen	2.93E+01	2.07E+00	9.92E-01	0.00E+00	0.00E+00	9.11E-03	3.29E-01	0.00E+00
Child	6.73E+01	3.60E+00	2.29E+00	0.00E+00	0.00E+00	8.16E-03	2.43E-01	0.00E+00
Infant	2.11E+01	1.30E+00	7.32E-01	0.00E+00	0.00E+00	6.19E-03	6.49E-02	0.00E+00

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Ni-65								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	8.95E-08	1.19E-08	4.17E-04	0.00E+00	0.00E+00	1.66E-04	3.66E-04	4.85E-04
Teen	1.06E-07	1.39E-08	4.17E-04	0.00E+00	0.00E+00	2.78E-04	1.09E-03	4.85E-04
Child	1.64E-07	1.58E-08	4.17E-04	0.00E+00	0.00E+00	2.43E-04	2.49E-03	4.85E-04
Infant	7.17E-08	8.51E-09	4.17E-04	0.00E+00	0.00E+00	2.41E-04	1.49E-03	4.85E-04

Dose factor - airborne release pathway (mrem/Ci released)								
Cu-64								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	1.12E-05	8.57E-04	0.00E+00	2.82E-05	2.01E-04	2.40E-03	9.65E-04
Teen	0.00E+00	1.40E-05	8.58E-04	0.00E+00	3.54E-05	3.30E-04	2.90E-03	9.65E-04
Child	0.00E+00	2.19E-05	8.65E-04	0.00E+00	5.28E-05	2.84E-04	2.11E-03	9.65E-04
Infant	0.00E+00	3.42E-05	8.68E-04	0.00E+00	5.79E-05	2.76E-04	1.15E-03	9.65E-04

Dose factor - airborne release pathway (mrem/Ci released)								
Zn-65								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.21E+00	3.85E+00	2.79E+00	0.00E+00	2.57E+00	2.56E-02	2.42E+00	1.21E+00
Teen	1.63E+00	5.67E+00	3.69E+00	0.00E+00	3.63E+00	3.68E-02	2.40E+00	1.21E+00
Child	3.12E+00	8.31E+00	6.22E+00	0.00E+00	5.24E+00	2.95E-02	1.46E+00	1.21E+00
Infant	2.95E+00	1.01E+01	5.71E+00	0.00E+00	4.91E+00	1.92E-02	8.54E+00	1.21E+00

Dose factor - airborne release pathway (mrem/Ci released)								
Zn-69								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.01E-06	5.76E-06	4.01E-07	0.00E+00	3.74E-06	2.73E-05	1.35E-06	0.00E+00
Teen	4.64E-06	8.83E-06	6.18E-07	0.00E+00	5.77E-06	4.70E-05	2.47E-05	0.00E+00
Child	1.08E-05	1.56E-05	1.45E-06	0.00E+00	9.49E-06	4.22E-05	1.29E-03	0.00E+00
Infant	1.93E-05	3.48E-05	2.59E-06	0.00E+00	1.45E-05	4.36E-05	3.23E-03	0.00E+00

Dose factor - airborne release pathway (mrem/Ci released)								
Zn-69m								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.99E-05	1.20E-04	3.07E-03	0.00E+00	7.26E-05	5.65E-04	1.13E-02	5.74E-03
Teen	7.60E-05	1.79E-04	3.07E-03	0.00E+00	1.09E-04	9.30E-04	1.49E-02	5.74E-03
Child	1.76E-04	3.00E-04	3.09E-03	0.00E+00	1.74E-04	8.08E-04	1.27E-02	5.74E-03
Infant	3.11E-04	6.35E-04	3.12E-03	0.00E+00	2.57E-04	7.93E-04	1.00E-02	5.74E-03

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)

Br-82

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	0.00E+00	5.44E-02	0.00E+00	0.00E+00	0.00E+00	8.47E-03	6.41E-02
Teen	0.00E+00	0.00E+00	5.89E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.41E-02
Child	0.00E+00	0.00E+00	7.04E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.41E-02
Infant	0.00E+00	0.00E+00	8.32E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	6.41E-02

Dose factor - airborne release pathway (mrem/Ci released)

Br-83

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	0.00E+00	1.65E-05	0.00E+00	0.00E+00	0.00E+00	6.89E-06	2.84E-03
Teen	0.00E+00	0.00E+00	1.96E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.84E-03
Child	0.00E+00	0.00E+00	2.34E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.84E-03
Infant	0.00E+00	0.00E+00	2.07E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.84E-03

Dose factor - airborne release pathway (mrem/Ci released)

Br-84

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	0.00E+00	2.59E-02	0.00E+00	0.00E+00	0.00E+00	1.11E-09	2.49E-01
Teen	0.00E+00	0.00E+00	2.60E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.49E-01
Child	0.00E+00	0.00E+00	2.63E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.49E-01
Infant	0.00E+00	0.00E+00	2.66E-02	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.49E-01

Dose factor - airborne release pathway (mrem/Ci released)

Br-85

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	0.00E+00	4.95E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.63E-04
Teen	0.00E+00	0.00E+00	7.06E-06	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.63E-04
Child	0.00E+00	0.00E+00	2.02E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.63E-04
Infant	0.00E+00	0.00E+00	4.21E-05	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.63E-04

Dose factor - airborne release pathway (mrem/Ci released)

Rb-86

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	8.21E-01	3.95E-01	0.00E+00	0.00E+00	0.00E+00	1.61E-01	1.44E-02
Teen	0.00E+00	1.23E+00	5.92E-01	0.00E+00	0.00E+00	0.00E+00	1.82E-01	1.44E-02
Child	0.00E+00	2.18E+00	1.35E+00	0.00E+00	0.00E+00	0.00E+00	1.40E-01	1.44E-02
Infant	0.00E+00	4.17E+00	2.07E+00	0.00E+00	0.00E+00	0.00E+00	1.07E-01	1.44E-02

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)

Rb-88

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	1.15E-05	5.22E-05	0.00E+00	0.00E+00	0.00E+00	9.92E-17	5.31E-05
Teen	0.00E+00	1.62E-05	5.45E-05	0.00E+00	0.00E+00	0.00E+00	8.66E-13	5.31E-05
Child	0.00E+00	1.67E-05	5.73E-05	0.00E+00	0.00E+00	0.00E+00	5.12E-07	5.31E-05
Infant	0.00E+00	1.65E-05	5.50E-05	0.00E+00	0.00E+00	0.00E+00	1.01E-05	5.31E-05

Dose factor - airborne release pathway (mrem/Ci released)

Rb-89

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	7.60E-06	1.78E-04	0.00E+00	0.00E+00	0.00E+00	2.75E-19	2.07E-04
Teen	0.00E+00	1.04E-05	1.80E-04	0.00E+00	0.00E+00	0.00E+00	1.00E-14	2.07E-04
Child	0.00E+00	1.02E-05	1.81E-04	0.00E+00	0.00E+00	0.00E+00	5.61E-08	2.07E-04
Infant	0.00E+00	9.51E-06	1.79E-04	0.00E+00	0.00E+00	0.00E+00	2.02E-06	2.07E-04

Dose factor - airborne release pathway (mrem/Ci released)

Sr-89

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	7.63E+00	0.00E+00	2.19E-01	0.00E+00	0.00E+00	4.15E-02	1.23E+00	3.53E-05
Teen	1.16E+01	0.00E+00	3.34E-01	0.00E+00	0.00E+00	7.17E-02	1.40E+00	3.53E-05
Child	2.77E+01	0.00E+00	7.90E-01	0.00E+00	0.00E+00	6.40E-02	1.08E+00	3.53E-05
Infant	3.66E+00	0.00E+00	1.05E-01	0.00E+00	0.00E+00	6.02E-02	7.69E-02	3.53E-05

Dose factor - airborne release pathway (mrem/Ci released)

Sr-90

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	5.10E+02	0.00E+00	1.25E+02	0.00E+00	0.00E+00	2.85E-01	1.47E+01	0.00E+00
Teen	6.33E+02	0.00E+00	1.56E+02	0.00E+00	0.00E+00	4.89E-01	1.77E+01	0.00E+00
Child	1.05E+03	0.00E+00	2.65E+02	0.00E+00	0.00E+00	4.38E-01	1.41E+01	0.00E+00
Infant	7.33E+01	0.00E+00	1.84E+01	0.00E+00	0.00E+00	3.34E-01	9.04E-01	0.00E+00

Dose factor - airborne release pathway (mrem/Ci released)

Sr-91

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	2.29E-04	0.00E+00	3.03E-03	0.00E+00	0.00E+00	1.08E-03	6.76E-03	3.53E-03
Teen	2.20E-04	0.00E+00	3.03E-03	0.00E+00	0.00E+00	1.80E-03	8.68E-03	3.53E-03
Child	4.09E-04	0.00E+00	3.03E-03	0.00E+00	0.00E+00	1.58E-03	6.06E-03	3.53E-03
Infant	5.29E-05	0.00E+00	3.02E-03	0.00E+00	0.00E+00	1.56E-03	2.24E-03	3.53E-03

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)

Sr-92

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	5.04E-07	0.00E+00	1.65E-03	0.00E+00	0.00E+00	4.89E-04	1.28E-03	3.15E-03
Teen	5.66E-07	0.00E+00	1.65E-03	0.00E+00	0.00E+00	8.14E-04	3.54E-03	3.15E-03
Child	9.08E-07	0.00E+00	1.65E-03	0.00E+00	0.00E+00	7.12E-04	7.20E-03	3.15E-03
Infant	3.12E-07	0.00E+00	1.65E-03	0.00E+00	0.00E+00	7.06E-04	4.15E-03	3.15E-03

Dose factor - airborne release pathway (mrem/Ci released)

Y-90

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	7.17E-05	0.00E+00	8.23E-06	0.00E+00	0.00E+00	5.03E-03	1.19E-01	7.45E-06
Teen	9.77E-05	0.00E+00	8.93E-06	0.00E+00	0.00E+00	8.69E-03	9.20E-02	7.45E-06
Child	1.39E-04	0.00E+00	1.00E-05	0.00E+00	0.00E+00	7.76E-03	5.63E-02	7.45E-06
Infant	9.77E-05	0.00E+00	8.93E-06	0.00E+00	0.00E+00	7.98E-03	3.26E-03	7.45E-06

Dose factor - airborne release pathway (mrem/Ci released)

Y-91

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.78E-02	0.00E+00	1.98E-03	0.00E+00	0.00E+00	5.06E-02	2.26E+00	1.70E-03
Teen	2.55E-02	0.00E+00	2.19E-03	0.00E+00	0.00E+00	8.71E-02	2.44E+00	1.70E-03
Child	4.10E-02	0.00E+00	2.60E-03	0.00E+00	0.00E+00	7.79E-02	1.86E+00	1.70E-03
Infant	1.75E-02	0.00E+00	1.97E-03	0.00E+00	0.00E+00	7.27E-02	3.72E-03	1.70E-03

Dose factor - airborne release pathway (mrem/Ci released)

Y-91m

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.58E-06	0.00E+00	2.31E-04	0.00E+00	0.00E+00	5.70E-05	1.05E-05	4.33E-04
Teen	6.15E-06	0.00E+00	2.31E-04	0.00E+00	0.00E+00	9.49E-05	2.91E-04	4.33E-04
Child	1.50E-05	0.00E+00	2.31E-04	0.00E+00	0.00E+00	8.34E-05	2.94E-02	4.33E-04
Infant	1.21E-08	0.00E+00	2.31E-04	0.00E+00	0.00E+00	8.27E-05	6.98E-05	4.33E-04

Dose factor - airborne release pathway (mrem/Ci released)

Y-92

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.35E-05	0.00E+00	4.38E-04	0.00E+00	0.00E+00	4.65E-04	5.83E-01	2.90E-02
Teen	5.80E-05	0.00E+00	4.39E-04	0.00E+00	0.00E+00	7.95E-04	1.58E+00	2.90E-02
Child	1.42E-04	0.00E+00	4.41E-04	0.00E+00	0.00E+00	7.09E-04	4.09E+00	2.90E-02
Infant	4.86E-07	0.00E+00	4.37E-04	0.00E+00	0.00E+00	7.27E-04	3.76E-03	2.90E-02

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Y-93								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.08E-04	0.00E+00	4.43E-04	0.00E+00	0.00E+00	1.44E-03	3.35E+00	6.58E-02
Teen	1.86E-04	0.00E+00	4.45E-04	0.00E+00	0.00E+00	2.47E-03	5.59E+00	6.58E-02
Child	4.53E-04	0.00E+00	4.52E-04	0.00E+00	0.00E+00	2.21E-03	6.69E+00	6.58E-02
Infant	4.45E-06	0.00E+00	4.40E-04	0.00E+00	0.00E+00	2.27E-03	4.95E-03	6.58E-02

Dose factor - airborne release pathway (mrem/Ci released)								
Zr-95								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.79E-03	1.54E-03	3.45E-01	0.00E+00	2.42E-03	5.25E-02	1.64E+00	3.98E-01
Teen	6.16E-03	1.94E-03	3.45E-01	0.00E+00	2.85E-03	7.98E-02	1.35E+00	3.98E-01
Child	9.47E-03	2.08E-03	3.45E-01	0.00E+00	2.97E-03	6.62E-02	8.81E-01	3.98E-01
Infant	3.43E-03	8.27E-04	3.44E-01	0.00E+00	9.23E-04	5.19E-02	9.12E-04	3.98E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Zr-97								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.12E-06	6.31E-07	4.16E-03	0.00E+00	9.56E-07	2.34E-03	3.09E-02	4.84E-03
Teen	4.31E-06	8.52E-07	4.16E-03	0.00E+00	1.29E-06	3.85E-03	3.09E-02	4.84E-03
Child	5.98E-06	8.66E-07	4.16E-03	0.00E+00	1.24E-06	3.36E-03	1.95E-02	4.84E-03
Infant	4.45E-06	7.60E-07	4.16E-03	0.00E+00	7.69E-07	3.27E-03	4.16E-03	4.84E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Nb-95								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.39E-03	7.75E-04	1.92E-01	0.00E+00	7.67E-04	1.50E-02	3.30E+00	2.26E-01
Teen	1.39E-03	7.72E-04	1.92E-01	0.00E+00	7.48E-04	2.23E-02	1.99E+00	2.26E-01
Child	2.22E-03	8.65E-04	1.93E-01	0.00E+00	8.13E-04	1.82E-02	1.10E+00	2.26E-01
Infant	6.08E-04	2.49E-04	1.92E-01	0.00E+00	1.82E-04	1.42E-02	4.99E-02	2.26E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Nb-97								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	2.05E-06	5.17E-07	4.17E-04	0.00E+00	6.03E-07	7.12E-05	1.91E-03	3.20E-03
Teen	3.50E-06	8.68E-07	4.17E-04	0.00E+00	1.02E-06	1.17E-04	2.07E-02	3.20E-03
Child	8.49E-06	1.53E-06	4.17E-04	0.00E+00	1.70E-06	1.01E-04	4.73E-01	3.20E-03
Infant	1.01E-08	2.16E-09	4.17E-04	0.00E+00	1.69E-09	9.84E-05	7.98E-04	3.20E-03

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Mo-99								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	0.00E+00	9.10E-03	7.34E-03	0.00E+00	2.06E-02	2.71E-03	2.85E-02	6.50E-03
Teen	0.00E+00	1.24E-02	7.97E-03	0.00E+00	2.84E-02	4.56E-03	3.02E-02	6.50E-03
Child	0.00E+00	2.06E-02	1.07E-02	0.00E+00	4.41E-02	4.02E-03	2.08E-02	6.50E-03
Infant	0.00E+00	3.82E-02	1.31E-02	0.00E+00	5.70E-02	4.00E-03	1.40E-02	6.50E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Tc-99m								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	2.92E-09	8.24E-09	2.59E-04	0.00E+00	1.25E-07	2.27E-05	1.28E-04	2.96E-04
Teen	3.11E-09	8.68E-09	2.59E-04	0.00E+00	1.29E-07	3.42E-05	1.87E-04	2.96E-04
Child	5.95E-09	1.17E-08	2.59E-04	0.00E+00	1.69E-07	2.82E-05	1.49E-04	2.96E-04
Infant	5.14E-09	1.06E-08	2.59E-04	0.00E+00	1.14E-07	2.41E-05	6.33E-05	2.96E-04

Dose factor - airborne release pathway (mrem/Ci released)								
Tc-101								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.16E-05	1.67E-05	2.08E-04	0.00E+00	3.01E-04	2.04E-05	5.06E-17	5.80E-04
Teen	1.99E-05	2.83E-05	3.23E-04	0.00E+00	5.12E-04	3.71E-05	4.87E-12	5.80E-04
Child	4.89E-05	5.12E-05	6.93E-04	0.00E+00	8.72E-04	4.44E-05	1.63E-04	5.80E-04
Infant	1.93E-12	2.44E-12	4.44E-05	0.00E+00	2.90E-11	1.73E-05	2.50E-05	5.80E-04

Dose factor - airborne release pathway (mrem/Ci released)								
Ru-103								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.36E-02	0.00E+00	1.71E-01	0.00E+00	1.66E-01	1.50E-02	5.08E+00	1.77E-01
Teen	3.76E-02	0.00E+00	1.68E-01	0.00E+00	1.33E-01	2.32E-02	3.14E+00	1.77E-01
Child	7.01E-02	0.00E+00	1.79E-01	0.00E+00	1.77E-01	1.97E-02	1.81E+00	1.77E-01
Infant	6.20E-05	0.00E+00	1.52E-01	0.00E+00	1.30E-04	1.64E-02	5.05E-04	1.77E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Ru-105								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	6.19E-04	0.00E+00	2.07E-03	0.00E+00	7.99E-03	3.25E-04	3.80E-01	1.02E-02
Teen	1.06E-03	0.00E+00	2.23E-03	0.00E+00	1.34E-02	5.39E-04	8.59E-01	1.02E-02
Child	2.59E-03	0.00E+00	2.76E-03	0.00E+00	2.28E-02	4.72E-04	1.69E+00	1.02E-02
Infant	3.63E-08	0.00E+00	1.82E-03	0.00E+00	2.67E-08	4.65E-04	1.44E-03	1.02E-02

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Ru-106								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.65E+00	0.00E+00	8.01E-01	0.00E+00	3.18E+00	2.78E-01	1.06E+02	7.11E-01
Teen	1.49E+00	0.00E+00	7.81E-01	0.00E+00	2.88E+00	4.77E-01	7.16E+01	7.11E-01
Child	2.93E+00	0.00E+00	9.58E-01	0.00E+00	3.96E+00	4.25E-01	4.55E+01	7.11E-01
Infant	2.67E-03	0.00E+00	5.93E-01	0.00E+00	3.28E-03	3.43E-01	5.60E-03	7.11E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Rh-105								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.81E-02	3.52E-02	2.47E-02	0.00E+00	1.50E-01	5.72E-04	5.61E+00	7.74E-03
Teen	8.33E-02	6.02E-02	4.10E-02	0.00E+00	2.56E-01	9.71E-04	7.66E+00	7.74E-03
Child	2.04E-01	1.10E-01	9.53E-02	0.00E+00	4.37E-01	8.59E-04	6.80E+00	7.74E-03
Infant	7.15E-04	4.68E-04	1.83E-03	0.00E+00	1.30E-03	8.64E-04	1.22E-02	7.74E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Ag-110m								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.10E-02	3.80E-02	4.85E+00	0.00E+00	7.47E-02	1.37E-01	1.54E+01	5.63E+00
Teen	6.28E-02	5.94E-02	4.86E+00	0.00E+00	1.13E-01	2.00E-01	1.66E+01	5.63E+00
Child	1.34E-01	9.04E-02	4.90E+00	0.00E+00	1.68E-01	1.62E-01	1.07E+01	5.63E+00
Infant	1.93E-01	1.41E-01	4.92E+00	0.00E+00	2.02E-01	1.09E-01	7.31E+00	5.63E+00

Dose factor - airborne release pathway (mrem/Ci released)								
Sb-124								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.44E-01	2.73E-03	1.36E+00	3.50E-04	0.00E+00	1.85E-01	4.09E+00	4.02E+00
Teen	2.22E-01	4.09E-03	1.39E+00	5.03E-04	0.00E+00	3.07E-01	4.46E+00	4.02E+00
Child	5.11E-01	6.63E-03	1.48E+00	1.13E-03	0.00E+00	3.79E-01	3.19E+00	4.02E+00
Infant	6.72E-02	9.90E-04	1.32E+00	1.78E-04	0.00E+00	1.20E-01	2.06E-01	4.02E+00

Dose factor - airborne release pathway (mrem/Ci released)								
Sb-125								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.07E-01	1.20E-03	5.38E+00	1.09E-04	0.00E+00	1.33E-01	1.17E+00	9.11E+00
Teen	1.61E-01	1.76E-03	5.39E+00	1.54E-04	0.00E+00	2.21E-01	1.24E+00	9.11E+00
Child	3.69E-01	2.84E-03	5.43E+00	3.42E-04	0.00E+00	2.73E-01	8.75E-01	9.11E+00
Infant	8.33E-02	8.05E-04	5.37E+00	1.04E-04	0.00E+00	9.99E-02	1.09E-01	9.11E+00

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Te-125m								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.87E-01	1.40E-01	6.67E-02	1.16E-01	1.57E+00	9.30E-03	1.55E+00	3.96E-02
Teen	5.11E-01	1.84E-01	8.32E-02	1.43E-01	0.00E+00	1.59E-02	1.51E+00	3.96E-02
Child	1.17E+00	3.16E-01	1.70E-01	3.27E-01	0.00E+00	1.42E-02	1.13E+00	3.96E-02
Infant	5.10E-02	1.71E-02	2.18E-02	1.72E-02	0.00E+00	1.33E-02	2.46E-02	3.96E-02

Dose factor - airborne release pathway (mrem/Ci released)								
Te-127								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.47E-06	1.61E-06	5.15E-06	3.31E-06	1.82E-05	1.93E-04	2.05E-03	4.60E-06
Teen	4.34E-06	1.55E-06	5.12E-06	3.00E-06	1.76E-05	3.32E-04	2.73E-03	4.60E-06
Child	8.13E-06	2.20E-06	5.93E-06	5.63E-06	2.31E-05	2.98E-04	1.98E-03	4.60E-06
Infant	1.25E-06	4.25E-07	4.45E-06	1.02E-06	3.03E-06	3.07E-04	7.48E-04	4.60E-06

Dose factor - airborne release pathway (mrem/Ci released)								
Te-127m								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.19E+00	4.26E-01	1.54E-01	3.05E-01	4.84E+00	2.85E-02	4.00E+00	6.16E-02
Teen	1.48E+00	5.26E-01	1.85E-01	3.52E-01	6.01E+00	4.91E-02	3.70E+00	6.16E-02
Child	3.32E+00	8.94E-01	4.03E-01	7.94E-01	9.47E+00	4.39E-02	2.69E+00	6.16E-02
Infant	1.96E-01	6.50E-02	3.26E-02	5.66E-02	4.82E-01	3.89E-02	7.96E-02	6.16E-02

Dose factor - airborne release pathway (mrem/Ci released)								
Te-129								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.48E-09	7.10E-10	3.68E-05	1.16E-09	5.56E-09	5.74E-05	4.65E-06	4.36E-05
Teen	2.11E-09	1.00E-09	3.68E-05	1.54E-09	7.88E-09	9.78E-05	4.79E-05	4.36E-05
Child	2.90E-09	1.04E-09	3.68E-05	2.12E-09	7.62E-09	8.71E-05	7.56E-04	4.36E-05
Infant	2.34E-09	1.03E-09	3.68E-05	2.00E-09	5.19E-09	8.89E-05	7.81E-04	4.36E-05

Dose factor - airborne release pathway (mrem/Ci released)								
Te-129m								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.39E+00	5.19E-01	2.35E-01	4.78E-01	5.80E+00	3.44E-02	7.01E+00	9.07E-01
Teen	1.94E+00	7.20E-01	3.22E-01	6.26E-01	8.12E+00	5.86E-02	7.30E+00	9.07E-01
Child	4.53E+00	1.26E+00	7.18E-01	1.46E+00	1.33E+01	5.23E-02	5.53E+00	9.07E-01
Infant	1.39E-01	4.77E-02	3.66E-02	5.34E-02	3.48E-01	4.98E-02	8.46E-02	9.07E-01

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Te-131								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.47E-03	6.14E-04	5.56E-04	1.21E-03	6.43E-03	4.13E-05	2.09E-04	1.63E-03
Teen	2.52E-03	1.04E-03	8.80E-04	1.94E-03	1.10E-02	6.93E-05	2.07E-04	1.63E-03
Child	6.19E-03	1.89E-03	1.93E-03	4.73E-03	1.87E-02	6.09E-05	3.25E-02	1.63E-03
Infant	5.15E-10	2.44E-10	9.27E-05	4.69E-10	1.18E-09	6.11E-05	2.44E-04	1.63E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Te-131m								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.30E-01	6.34E-02	7.45E-02	1.00E-01	6.43E-01	4.32E-03	6.32E+00	3.77E-02
Teen	2.21E-01	1.06E-01	1.10E-01	1.60E-01	1.11E+00	7.05E-03	8.53E+00	3.77E-02
Child	5.38E-01	1.86E-01	2.20E-01	3.83E-01	1.80E+00	6.10E-03	7.56E+00	3.77E-02
Infant	6.34E-04	2.56E-04	2.18E-02	5.18E-04	1.76E-03	5.90E-03	7.81E-03	3.77E-02

Dose factor - airborne release pathway (mrem/Ci released)								
Te-132								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.92E-01	1.24E-01	1.27E-01	1.37E-01	1.20E+00	8.55E-03	5.89E+00	1.32E-02
Teen	3.19E-01	2.02E-01	2.00E-01	2.13E-01	1.94E+00	1.33E-02	6.42E+00	1.32E-02
Child	7.61E-01	3.37E-01	4.17E-01	4.91E-01	3.13E+00	1.12E-02	3.39E+00	1.32E-02
Infant	3.94E-03	1.95E-03	1.17E-02	2.88E-03	1.22E-02	1.01E-02	8.50E-03	1.32E-02

Dose factor - airborne release pathway (mrem/Ci released)								
I-131								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	7.16E-02	1.02E-01	8.29E-02	3.36E+01	1.76E-01	0.00E+00	2.69E-02	2.93E-02
Teen	6.57E-02	9.19E-02	7.35E-02	2.68E+01	1.58E-01	0.00E+00	1.81E-02	2.93E-02
Child	1.44E-01	1.45E-01	1.07E-01	4.80E+01	2.38E-01	0.00E+00	1.29E-02	2.93E-02
Infant	2.04E-01	2.40E-01	1.30E-01	7.89E+01	2.80E-01	0.00E+00	8.56E-03	2.93E-02

Dose factor - airborne release pathway (mrem/Ci released)								
I-132								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.44E-05	9.67E-05	1.78E-03	3.40E-03	1.54E-04	0.00E+00	1.21E-05	2.06E-03
Teen	4.73E-05	1.30E-04	1.80E-03	4.49E-03	2.05E-04	0.00E+00	3.78E-05	2.06E-03
Child	6.28E-05	1.21E-04	1.80E-03	5.74E-03	1.86E-04	0.00E+00	9.50E-05	2.06E-03
Infant	5.03E-05	1.05E-04	1.79E-03	5.03E-03	1.17E-04	0.00E+00	5.65E-05	2.06E-03

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
I-133								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.46E-03	2.53E-03	4.21E-03	3.71E-01	4.41E-03	0.00E+00	2.14E-03	4.19E-03
Teen	1.49E-03	2.52E-03	4.21E-03	3.53E-01	4.42E-03	0.00E+00	1.75E-03	4.19E-03
Child	2.87E-03	3.55E-03	4.78E-03	6.61E-01	5.91E-03	0.00E+00	1.35E-03	4.19E-03
Infant	3.16E-03	4.59E-03	4.79E-03	8.37E-01	5.40E-03	0.00E+00	7.45E-04	4.19E-03

Dose factor - airborne release pathway (mrem/Ci released)								
I-134								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.91E-05	5.13E-05	6.45E-04	8.85E-04	8.17E-05	0.00E+00	2.99E-08	7.45E-04
Teen	2.63E-05	6.88E-05	6.52E-04	1.17E-03	1.09E-04	0.00E+00	6.05E-07	7.45E-04
Child	3.48E-05	6.41E-05	6.57E-04	1.50E-03	9.79E-05	0.00E+00	2.83E-05	7.45E-04
Infant	2.73E-05	5.57E-05	6.47E-04	1.32E-03	6.19E-05	0.00E+00	3.83E-05	7.45E-04

Dose factor - airborne release pathway (mrem/Ci released)								
I-135								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	9.31E-05	2.43E-04	3.64E-03	1.56E-02	3.87E-04	0.00E+00	1.96E-04	4.14E-03
Teen	1.22E-04	3.12E-04	3.66E-03	2.05E-02	4.92E-04	0.00E+00	2.41E-04	4.14E-03
Child	1.69E-04	3.00E-04	3.69E-03	2.72E-02	4.61E-04	0.00E+00	1.63E-04	4.14E-03
Infant	1.23E-04	2.43E-04	3.64E-03	2.22E-02	2.70E-04	0.00E+00	6.06E-05	4.14E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Cs-134								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	6.68E+00	1.59E+01	2.26E+01	0.00E+00	5.15E+00	1.71E+00	2.78E-01	1.12E+01
Teen	1.06E+01	2.49E+01	2.12E+01	0.00E+00	7.90E+00	3.02E+00	3.09E-01	1.12E+01
Child	2.39E+01	3.93E+01	1.79E+01	0.00E+00	1.22E+01	4.37E+00	2.12E-01	1.12E+01
Infant	1.96E+01	3.66E+01	1.33E+01	0.00E+00	9.42E+00	3.86E+00	9.94E-02	1.12E+01

Dose factor - airborne release pathway (mrem/Ci released)								
Cs-134m								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	8.36E-04	1.76E-03	9.41E-04	0.00E+00	9.54E-04	1.50E-04	6.19E-04	6.90E-05
Teen	1.40E-03	2.89E-03	1.53E-03	0.00E+00	1.61E-03	2.83E-04	1.92E-03	6.90E-05
Child	3.30E-03	4.89E-03	3.24E-03	0.00E+00	2.58E-03	4.27E-04	6.18E-03	6.90E-05
Infant	5.48E-06	8.72E-06	4.70E-05	0.00E+00	3.53E-06	8.31E-07	4.82E-06	6.90E-05

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Cs-136								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.31E-01	1.31E+00	1.28E+00	0.00E+00	7.27E-01	9.97E-02	1.48E-01	4.73E-01
Teen	5.12E-01	2.02E+00	1.70E+00	0.00E+00	1.10E+00	1.73E-01	1.62E-01	4.73E-01
Child	1.14E+00	3.14E+00	2.38E+00	0.00E+00	1.67E+00	2.49E-01	1.10E-01	4.73E-01
Infant	3.54E-01	1.04E+00	7.33E-01	0.00E+00	4.15E-01	8.48E-02	1.58E-02	4.73E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Cs-137								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	9.52E+00	1.30E+01	2.30E+01	0.00E+00	4.42E+00	1.47E+00	2.52E-01	1.69E+01
Teen	1.57E+01	2.09E+01	2.18E+01	0.00E+00	7.12E+00	2.77E+00	2.97E-01	1.69E+01
Child	3.73E+01	3.57E+01	1.97E+01	0.00E+00	1.16E+01	4.18E+00	2.23E-01	1.69E+01
Infant	2.99E+01	3.49E+01	1.70E+01	0.00E+00	9.38E+00	3.80E+00	1.09E-01	1.69E+01

Dose factor - airborne release pathway (mrem/Ci released)								
Cs-138								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	2.17E-03	4.28E-03	2.70E-03	0.00E+00	3.14E-03	3.10E-04	1.82E-08	4.39E-03
Teen	3.69E-03	7.08E-03	4.13E-03	0.00E+00	5.23E-03	6.08E-04	3.21E-06	4.39E-03
Child	8.93E-03	1.24E-02	8.46E-03	0.00E+00	8.73E-03	9.40E-04	5.71E-03	4.39E-03
Infant	1.50E-05	2.32E-05	5.97E-04	0.00E+00	1.22E-05	1.94E-06	2.60E-05	4.39E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Ba-139								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.78E-03	2.69E-06	1.38E-04	0.00E+00	2.52E-06	4.62E-05	6.71E-03	6.76E-03
Teen	6.56E-03	4.61E-06	2.18E-04	0.00E+00	4.35E-06	8.00E-05	5.86E-02	6.76E-03
Child	1.61E-02	8.60E-06	4.95E-04	0.00E+00	7.51E-06	7.37E-05	9.31E-01	6.76E-03
Infant	1.76E-08	1.17E-11	2.75E-05	0.00E+00	7.04E-12	7.07E-05	6.06E-04	6.76E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Ba-140								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.09E-01	1.37E-04	3.60E-02	0.00E+00	4.67E-05	3.78E-02	2.29E-01	3.29E-02
Teen	1.19E-01	1.46E-04	3.65E-02	0.00E+00	4.94E-05	6.04E-02	1.88E-01	3.29E-02
Child	2.39E-01	2.10E-04	4.28E-02	0.00E+00	6.83E-05	5.18E-02	1.23E-01	3.29E-02
Infant	4.46E-02	4.46E-05	3.11E-02	0.00E+00	1.06E-05	4.74E-02	1.17E-02	3.29E-02

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
Ba-141								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.83E-03	1.39E-06	2.01E-04	0.00E+00	1.29E-06	2.38E-05	8.66E-13	1.55E-03
Teen	3.16E-03	2.36E-06	2.45E-04	0.00E+00	2.19E-06	4.07E-05	6.75E-09	1.55E-03
Child	7.79E-03	4.36E-06	3.92E-04	0.00E+00	3.77E-06	6.03E-05	4.44E-03	1.55E-03
Infant	1.86E-09	1.28E-12	1.39E-04	0.00E+00	7.72E-13	3.53E-05	5.64E-05	1.55E-03

Dose factor - airborne release pathway (mrem/Ci released)								
La-140								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.17E-05	5.91E-06	2.70E-02	0.00E+00	0.00E+00	4.04E-03	6.96E-02	3.06E-02
Teen	1.57E-05	7.71E-06	2.70E-02	0.00E+00	0.00E+00	6.36E-03	5.51E-02	3.06E-02
Child	2.18E-05	7.60E-06	2.70E-02	0.00E+00	0.00E+00	5.42E-03	3.26E-02	3.06E-02
Infant	1.56E-05	6.17E-06	2.70E-02	0.00E+00	0.00E+00	4.98E-03	5.27E-03	3.06E-02

Dose factor - airborne release pathway (mrem/Ci released)								
La-142								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.98E-06	2.27E-06	1.97E-03	0.00E+00	0.00E+00	7.52E-05	1.65E-02	9.71E-03
Teen	8.44E-06	3.75E-06	1.97E-03	0.00E+00	0.00E+00	1.21E-04	1.14E-01	9.71E-03
Child	2.04E-05	6.50E-06	1.97E-03	0.00E+00	0.00E+00	1.03E-04	1.29E+00	9.71E-03
Infant	1.22E-08	4.48E-09	1.97E-03	0.00E+00	0.00E+00	9.77E-05	7.07E-04	9.71E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Ce-141								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	7.38E-04	5.01E-04	1.93E-02	0.00E+00	2.32E-04	1.07E-02	3.84E-01	2.16E-02
Teen	1.05E-03	7.02E-04	1.93E-02	0.00E+00	3.29E-04	1.82E-02	4.02E-01	2.16E-02
Child	1.65E-03	8.20E-04	1.93E-02	0.00E+00	3.59E-04	1.61E-02	3.02E-01	2.16E-02
Infant	8.32E-04	5.00E-04	1.92E-02	0.00E+00	1.58E-04	1.53E-02	3.79E-03	2.16E-02

Dose factor - airborne release pathway (mrem/Ci released)								
Ce-143								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	6.71E-05	4.80E-02	4.80E-03	0.00E+00	2.18E-05	9.48E-04	1.80E+00	6.60E-02
Teen	1.15E-04	8.10E-02	4.81E-03	0.00E+00	3.74E-05	1.55E-03	2.44E+00	6.60E-02
Child	2.77E-04	1.48E-01	4.82E-03	0.00E+00	6.31E-05	1.37E-03	2.17E+00	6.60E-02
Infant	3.55E-06	5.06E-05	4.80E-03	0.00E+00	6.85E-07	1.38E-03	8.73E-04	6.60E-02

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)

Ce-144

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.26E-01	5.24E-02	1.04E-01	0.00E+00	3.10E-02	2.31E-01	8.05E+00	1.13E-01
Teen	1.83E-01	7.56E-02	1.07E-01	0.00E+00	4.51E-02	3.96E-01	9.46E+00	1.13E-01
Child	2.91E-01	9.10E-02	1.13E-01	0.00E+00	5.04E-02	3.55E-01	7.37E+00	1.13E-01
Infant	9.58E-02	3.64E-02	1.03E-01	0.00E+00	1.61E-02	2.92E-01	6.97E-02	1.13E-01

Dose factor - airborne release pathway (mrem/Ci released)

Pr-143

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	5.11E-04	2.05E-04	2.53E-05	0.00E+00	1.18E-04	3.34E-03	1.75E+00	3.77E-01
Teen	8.14E-04	3.25E-04	4.05E-05	0.00E+00	1.89E-04	5.74E-03	2.16E+00	3.77E-01
Child	1.82E-03	5.46E-04	9.02E-05	0.00E+00	2.96E-04	5.15E-03	1.73E+00	3.77E-01
Infant	1.67E-04	6.23E-05	8.32E-06	0.00E+00	2.35E-05	5.14E-03	5.83E-04	3.77E-01

Dose factor - airborne release pathway (mrem/Ci released)

Pr-144

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	8.93E-10	3.70E-10	2.58E-06	0.00E+00	2.09E-10	3.01E-05	6.39E-16	2.96E-06
Teen	1.27E-09	5.22E-10	2.58E-06	0.00E+00	2.99E-10	5.20E-05	6.98E-12	2.96E-06
Child	1.77E-09	5.48E-10	2.58E-06	0.00E+00	2.90E-10	4.64E-05	5.84E-06	2.96E-06
Infant	1.42E-09	5.48E-10	2.58E-06	0.00E+00	1.99E-10	4.78E-05	1.27E-04	2.96E-06

Dose factor - airborne release pathway (mrem/Ci released)

Nd-147

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	8.95E-05	1.03E-04	2.00E-02	0.00E+00	6.04E-05	2.62E-03	1.51E-01	2.00E-01
Teen	1.22E-04	1.33E-04	2.00E-02	0.00E+00	7.80E-05	4.42E-03	1.15E-01	2.00E-01
Child	1.85E-04	1.49E-04	2.00E-02	0.00E+00	8.22E-05	3.90E-03	7.33E-02	2.00E-01
Infant	9.45E-05	9.69E-05	2.00E-02	0.00E+00	3.75E-05	3.83E-03	4.73E-04	2.00E-01

Dose factor - airborne release pathway (mrem/Ci released)

Eu-152

	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.32E-02	2.45E-01	3.62E+01	0.00E+00	4.67E-02	3.26E-02	1.38E+00	6.86E+01
Teen	4.20E-02	1.02E-02	3.62E+01	0.00E+00	4.73E-02	4.76E-02	1.23E+00	6.86E+01
Child	6.02E-02	1.10E-02	3.62E+01	0.00E+00	4.64E-02	3.96E-02	8.25E-01	6.86E+01
Infant	1.30E-02	2.95E-03	3.62E+01	0.00E+00	9.90E-03	2.46E-02	5.31E-04	6.86E+01

Table 5.1-2

Dose factor - airborne release pathway (mrem/Ci released)								
W-187								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.08E-03	3.41E-03	7.22E-03	0.00E+00	0.00E+00	3.45E-04	1.12E+00	2.79E-02
Teen	6.98E-03	5.69E-03	8.03E-03	0.00E+00	0.00E+00	5.63E-04	1.54E+00	2.79E-02
Child	1.69E-02	1.00E-02	1.05E-02	0.00E+00	0.00E+00	4.88E-04	1.41E+00	2.79E-02
Infant	1.13E-05	7.88E-06	6.04E-03	0.00E+00	0.00E+00	4.71E-04	8.79E-04	2.79E-02

Dose factor - airborne release pathway (mrem/Ci released)								
U-235								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	4.06E+01	0.00E+00	1.04E+01	0.00E+00	9.47E+00	4.66E+00	3.87E+00	1.06E+01
Teen	6.45E+01	0.00E+00	1.19E+01	0.00E+00	1.51E+01	8.03E+00	4.59E+00	1.06E+01
Child	1.54E+02	0.00E+00	1.73E+01	0.00E+00	2.53E+01	7.17E+00	3.58E+00	1.06E+01
Infant	1.17E+01	0.00E+00	8.84E+00	0.00E+00	2.49E+00	5.46E+00	1.90E-01	1.06E+01

Dose factor - airborne release pathway (mrem/Ci released)								
U-238								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	3.88E+01	0.00E+00	2.33E+00	0.00E+00	8.86E+00	4.36E+00	2.72E+00	2.47E-01
Teen	6.17E+01	0.00E+00	3.70E+00	0.00E+00	1.41E+01	7.50E+00	3.23E+00	2.47E-01
Child	1.48E+02	0.00E+00	8.79E+00	0.00E+00	2.37E+01	6.73E+00	2.53E+00	2.47E-01
Infant	1.12E+01	0.00E+00	8.63E-01	0.00E+00	2.33E+00	5.09E+00	1.34E-01	2.47E-01

Dose factor - airborne release pathway (mrem/Ci released)								
Np-239								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	5.00E-05	4.92E-06	5.54E-03	0.00E+00	1.53E-05	4.47E-04	9.55E-01	9.52E-03
Teen	8.79E-05	8.29E-06	5.55E-03	0.00E+00	2.60E-05	7.71E-04	1.27E+00	9.52E-03
Child	2.11E-04	1.52E-05	5.55E-03	0.00E+00	4.39E-05	6.91E-04	1.10E+00	9.52E-03
Infant	4.42E-06	3.95E-07	5.54E-03	0.00E+00	7.88E-07	7.07E-04	3.14E-04	9.52E-03

Dose factor - airborne release pathway (mrem/Ci released)								
Am-241								
	Bone	Liver	T. Body	Thyroid	Kidney	Lungs	GI-LLI	Skin
Adult	1.34E+02	4.76E+01	1.03E+01	0.00E+00	6.70E+01	5.76E+00	3.48E+00	2.94E+00
Teen	1.46E+02	5.59E+01	1.11E+01	0.00E+00	7.31E+01	9.99E+00	4.12E+00	2.94E+00
Child	1.37E+02	6.14E+01	1.11E+01	0.00E+00	5.98E+01	8.88E+00	3.22E+00	2.94E+00
Infant	3.07E+01	1.41E+01	3.56E+00	0.00E+00	1.32E+01	6.76E+00	2.58E-03	2.94E+00

5.1.3 Atmospheric Release Mode: Noble Gases

The dose calculations for demonstration of compliance with the 10 CFR 50, Appendix I dose limits for noble gases released to the atmosphere will be done in the manner similar to the liquid release dose calculations described in Section 5.1.1. The total doses to the air, skin, and whole body resulting from the release of noble gases is compared to the corresponding Appendix limits. Noble gases released in liquids are to be added to the atmospherically released noble gases for Appendix I dose compliance calculations.

The doses are calculated using the following formula:

$$API = \Sigma\, Dose_{ti} = \Sigma\,(TDF_{ti} \times C_i) \leq K_t \text{ mrem}$$

where

API = the Appendix I dose for compliance evaluation in mrem

$Dose_{ti}$ = the dose to the applicable target (t) from radionuclide (i)

TDF_{ti} = total dose factor from Table 5.1-3 in mrem/Ci for the specific target (t) from radionuclide (i) based on the maximum annual average χ/Q at the site boundary

C_i = curies of radionuclide (i) released

K_t = the noble gas Appendix I dose limit for target (t)

The methodology used to obtain the TDF values are given in Appendix C.

Instead of using the precalculated total dose factors, the Appendix I dose calculation may be modified to reflect actual χ/Q values during the release using the methodology of Appendix C.

TABLE 5.1-3
ACTIVITY TO DOSE CONVERSION FACTORS FOR NOBLE GASES

(Highest Annual Average χ/Q)				
Nuclide	Beta Air (mrad/Ci)	Gamma Air (mrad/Ci)	Skin (mrem/Ci)	Whole Body (mrem/Ci)
AR-41	1.56E-04	4.42E-04	6.19E-04	4.20E-04
KR-83M	1.37E-05	9.18E-07	1.02E-06	3.59E-09
KR-85M	9.37E-05	5.85E-05	1.34E-04	5.56E-05
KR-85	9.27E-05	8.18E-07	6.46E-05	7.66E-07
KR-87	4.90E-04	2.93E-04	7.88E-04	2.81E-04
KR-88	1.39E-04	7.23E-04	9.15E-04	6.99E-04
KR-89	5.04E-04	8.23E-04	1.39E-03	7.89E-04
KR-90	3.72E-04	7.75E-04	1.21E-03	7.42E-04
XE-131M	5.28E-05	7.42E-06	3.09E-05	4.35E-06
XE-133M	7.04E-05	1.55E-05	6.45E-05	1.19E-05
XE-133	4.99E-05	1.68E-05	3.32E-05	1.40E-05
XE-135M	3.51E-05	1.60E-04	2.11E-04	1.48E-04
XE-135	1.17E-04	9.13E-05	1.90E-04	8.61E-05
XE-137	6.04E-04	7.18E-05	6.60E-04	6.75E-05
XE-138	2.26E-04	4.38E-04	6.82E-04	4.20E-04

6.0 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Requirements for the PBNP environmental monitoring program are detailed in Technical Specification 15.7.8.3. A complete description of the PBNP radiological environmental monitoring program, including procedures and responsibilities, is contained in the PBNP Environmental Manual. The latter is hereby incorporated into the Offsite Dose Calculation Manual (ODCM) by reference.

7.0 RADIOLOGICAL IMPACT EVALUATION OF SEWAGE TREATMENT SLUDGE DISPOSAL

The methodology for determining the radiological impact of contaminated sewage treatment sludge is presented in this section. The evaluation must be made prior to every land application of sewage treatment plant (STP) sludge that contains licensed material. Sludge and other STP material which does not contain licensed materials may be disposed of by any legal method without prior radiological analysis.

7.1 Basis, Commitments, and Actions

7.1.1 Basis

With the discovery that the PBNP STP sludge contained licensed material, Wisconsin Electric applied for NRC approval to dispose of the sludge by land application on land within the PBNP site boundary pursuant to 10 CFR 20.302(a). Wisconsin Electric committed to gamma isotopic analysis (GIA) of the sludge to measure the concentrations of licensed material in the STP sludge and to compare the results to concentration limits prior to each disposal [letter dated October 8, 1987 (VPNPD-87-430, NRC-87-104)]. In addition, the dose to the maximally exposed individual of the general public and to the inadvertent intruder would be evaluated for the appropriate exposure pathways.

7.1.2 Basis for NRC Commitment Modification

Pursuant to NRC guidance, the sludge is clean if no licensed materials are found when analyzed under conditions necessary to achieve the environmental LLDs (NRC HPPOS 221). Clean sludge is not under NRC jurisdiction and may be disposed of by any legal method without prior radioanalyses. Therefore, if the sludge is clean and there is no pathway to the STP from the RCA, or pathways are administratively controlled to prevent the transfer of licensed materials to the STP, there is no need to analyze the sludge prior to any disposal.

Since the 1987 commitment, engineering modifications and administrative controls have eliminated the pathways from the RCA to the STP. Three subsequent sludge GIAs (a total of eight STP samples) utilizing the analytical parameters required to achieve environmental lower limit of detection (LLD) found only naturally occurring radionuclides. In each analysis, the licensed materials were below the minimum detectable activity for the particular measurement and below the required LLDs. These results verify the efficiency of the modifications and administrative controls in eliminating pathways from the RCA to the STP. Therefore, because there is no longer any reason to believe that the PBNP STP sewage contains licensed material and there are no pathways from the RCA to the STP, the sewage may be disposed of by any legal method without GIA prior to each disposal.

7.1.3 Modification

Periodic gamma isotopic analyses (GIA) of the STP sludge shall occur at a frequency set forth in the Environmental Standing Orders (ESO). This may include analyses prior to disposal depending on the results from the periodic analyses. The GIA of the STP sludge shall meet the LLD criteria of normal liquid effluents. The detection of any licensed material in the sludge during the periodic GIA shall necessitate returning to the GIA prior to disposal in order to evaluate the radiological consequences of the disposal. The GIA prior to each disposal shall continue until such time that the sludge can be shown, using environmental LLD criteria, not to contain licensed material.

Also, re-initiation of the 1987 commitment to analyze the STP sludge prior to each disposal shall be required if plant conditions change in a manner which would lead one to believe that the STP sludge may be contaminated. An example of such a condition is the opening of valve STP-009 which is controlled by a danger tag. Again, reversion to an ESO controlled frequency can occur only upon verification that no licensed material is in the sludge pursuant to the environmental LLD criteria.

7.1.4 Exposure Evaluations

If the sludge contains licensed material, the 1987 commitment requires that the appropriate exposure pathways be evaluated prior to each application of sludge to insure that the dose to the maximally exposed member of the general public is maintained at less than 1 mrem/year and that to the inadvertent intruder, at less than 5 mrem/year. Also, the measured concentration shall be compared to the liquid maximum effluent concentrations of Appendix B to 10 CFR 20.

The exposure pathways evaluated for the maximally exposed individual are the following:

1. External whole body exposure due to a ground plane source of radionuclides.
2. Milk ingestion pathway from cows fed alfalfa grown on plot.
3. Meat ingestion pathway from cows fed alfalfa grown on plot.

4. Vegetable ingestion pathway from vegetables grown on plot.

5. Inhalation of radioactivity resuspended in air above plot.

6. Pathways associated with a release to Lake Michigan. These pathways are ingestion of potable water at the Two Rivers, Wisconsin municipal water supply, ingestion of fish from edge of initial mixing zone of radionuclide release, ingestion of fresh and stored vegetables irrigated with water from Lake Michigan, ingestion of milk and meat from cows utilizing Lake Michigan as drinking water source, swimming and boating activities at the edge of the initial mixing zone, and shoreline deposits.

The exposure pathways evaluated for the inadvertent intruder are the same as items 1, 4, 5, and 6 identified above for the maximally exposed individual.

7.2 Procedure

The following steps are to be performed by the responsible Radiological Engineer for each contaminated sewage treatment sludge disposal:

7.2.1 Obtain from PBNP-Chemistry the radionuclide concentrations in each representative sewage treatment sludge sample. The minimum number of representative samples required is three from each sludge storage tank. The average of all statistically valid concentration determinations will be utilized in determining the sludge storage tank concentration values.

7.2.2 Verify that the concentration of each radionuclide meets the concentration and activity limit criteria. The methodology for determining compliance with the concentration and activity limit criteria are contained in Appendix E.

7.2.3 Verify that the proposed disposal of the sewage treatment sludge will maintain doses within the applicable limits. This calculation will include radionuclides disposed of in previous sludge applications. The activity from these prior disposals will be corrected for radiological decay prior to performing dose calculations for the meat, milk, and vegetable ingestion pathways, the inhalation of resuspended radionuclides, and all pathways associated with a potential release to Lake Michigan. The residual radioactivity will be corrected, if applicable, for the mixing of radionuclides in the soil prior to performing external exposure calculations.

Wisconsin Electric utilizes QAD, a nationally recognized computer code, to perform shielding and dose rate analyses. QAD will be used to calculate the dose rate due to standing on a plot of land utilized for sludge disposal in which the radionuclides from prior disposals have been incorporated into the plot by plowing. This calculated dose rate will be used to assess the radiological consequences from prior disposals with the consequences of proposed future disposals. The total radiological dose consequence of the past and the proposed disposal will be compared to the applicable limits to insure the dose is maintained at or below the limits.

The methodology for calculating the radiological impact of the sewage treatment sludge disposal is contained in Appendix E.

7.2.4 Inform PBNP - Chemistry that the sewage treatment sludge disposal may proceed after verifying that the sewage treatment sludge meets the concentration, activity, and dose limits.

7.2.5 Forward all calculations to PBNP - Chemistry to be included with the sewage treatment sludge disposal record.

7.3 Administrative Requirements

7.3.1 Complete records of each contaminated disposal shall be kept as follows:

a. Radionuclide concentration of the sludge.

b. Total volume of sludge disposed.

c. The identity of the plot used for the disposal.

d. Dose calculation results.

e. Results of annual chemical composition determination.

7.3.2 Modifications to the October 8, 1987, NRC submittal

a. Modification 1 - Appendix F

Section 3.2 of Attachment II of the submittal states that physical and chemical properties of the sludge would be determined prior the each land application. Pursuant to a change in the PBNP WPDES Permit, non-radiological properties are now determined annually instead of per application. The frequency for radiological characterization did not change.

b. Modification 2 - Appendix G

In Section 3.3 of Attachment II of the submittal letter, the annual disposal rate was…" limited to 4,000 gallons/acre, provided WDNR chemical composition, NRC dose guidelines and activity limits are maintained...." Modification 2 removes the 4,000 gallon limit and makes the application unlimited provided the WDNR and NRC constraints are met.

c. Modification 3 - Appendix H

In Section 3.2 of Attachment II of NRC submittal letter dated October 8, 1987, Wisconsin Electric committed to gamma isotopic analysis (GIA) to determine the concentration of licensed material in sewage treatment plant (STP) sludge prior to each disposal. Pursuant to NRC HPPOS-221 guidance, the sludge has been shown to be clean on three different occasions after pathways from the RCA to the STP were eliminated by plant modifications and administrative controls. Pursuant to HPPOS, the sludge analyses were done under the conditions necessary to achieve the environmental LLDs. Only naturally occurring radionuclides were found and licensed material was below the minimum detectable concentration. This indicates that the former pathways from the RCA to the STP had been eliminated. Therefore, there is not need to continue the analyses because there is no RCA to STP pathway and there is no reason to believe that the sewage contains licensed material. Hence, the commitment to analyze STP sludge prior to every disposal is modified and replaced with periodic analyses at a frequency set by ESO-104. However, if plant conditions change in a manner which places the STP sewage outside the guidance parameters which allowed for the discontinuance of analyses, the sewage must be analyzed prior to each disposal until it again is shown not to contain licensed material.

APPENDIX A

DERIVATION OF LIQUID RELEASE PATHWAY

EFFECTIVE MAXIMUM EFFLUENT CONCENTRATION

A.1.0 Derivation of Liquid Release Effective Maximum Effluent Concentration

A.1.1 Source Term

The effective maximum effluent concentration is calculated from the annual releases via liquids for the years 1985-1991 (Table A-1). Although Na-24 was discharged in 1985, it was excluded from the isotopic mixture because it is not a radionuclide which would be normally found in PBNP effluent. Na-24 appears in the effluent because it was used for tests run on the steam system. Tritium also was omitted from the initial calculation because its production is largely independent from the appearance of the fission products in the effluent.

A.1.2 Effective Maximum Effluent Concentration

The effective maximum effluent concentration (EMEC) was calculated using the formula given in Section 3.6

$$EMEC = \Sigma C_i \;/\; \Sigma\,(C_i/MEC_i) \text{ or } \Sigma C_i * 1/SOF$$

where:

SOF = $\Sigma\, C_i/MEC_i$ is the summation of fractions for the annual effluent isotopic release

C_i = concentration of radionuclide "i" (μCi/ml) in effluent (annual discharge/total volume of discharge)

MEC_i = maximum effluent concentration for unrestricted areas from Appendix B, Table 2, Column 2 of the revised 10 CFR 20.

The SOF for radionuclides in liquid effluent for the years 1985 through 1991 were calculated with and without H-3 and used to calculate the EMEC for the same years (Table B-2). The average EMEC without H-3 is 4.29E-06 μCi/cc. This is the maximum concentration of non H-3 radionuclides in a mixture that could be released in liquid effluent without the SOF exceeding one (1).

However, the 10 CFR 20 Appendix B criterion is that the SOF for all radionuclides, including H-3 which can not be measured by the liquid effluent NaI RMS monitors, be less than or equal to one (1). Therefore, the above equation, modified by a factor of 0.70 to account for H-3, becomes

$$EMEC = 0.70\, \Sigma C_i \;/\; \Sigma\,(C_i/MEC_i) \text{ or } \Sigma C_i * 0.70/SOF.$$

The EMEC becomes

EMEC = 0.70 * 4.29E-06 = 3.00E-06 μCi/cc.

Only three radionuclides identified in PBNP liquid effluent have a lower MEC (10 CFR 20, Appendix B, Table 2). They are I-131 (1E-06), Cs-134 (9E-07), and Cs-137 (1E-06).

By restricting the non-tritium radionuclides to 70% of their calculated EMEC, the H-3 concentration can be discharged at 30% of its MEC or 3.00E-04 μCi/cc without exceeding the SOF criterion of 10 CFR 20, Appendix B for the total liquid effluent isotopic mixture.

TABLE A-1
CURIES RELEASED IN LIQUIDS

LIQUID RELEASES								
NUCLIDE	MEC uCi/cc	1985	1986	1987	1988	1989	1990	1991
H-3	1.00E-03	8.05E+02	8.11E+02	7.09E+02	3.57E+02	5.59E+02	8.72E+02	7.87E+02
I-131	1.00E-06	1.02E-01	3.74E-02	1.04E-02	1.40E-03	1.77E-03	1.53E-04	1.83E-03
I-132	1.00E-04	6.15E-02	7.25E-02	5.82E-02	1.03E-03	8.15E-04	4.45E-05	9.41E-03
I-133	7.00E-06	1.27E-01	1.49E-01	1.04E-01	1.21E-02	8.11E-03	3.01E-03	1.01E-02
I-134	4.00E-04	3.18E-02	4.39E-02	3.97E-02	2.29E-04	6.83E-04		
I-135	3.00E-05	1.04E-01	1.34E-01	1.23E-01	4.48E-04	8.21E-04		
AG-110M	6.00E-06	2.55E-05	2.84E-04	3.09E-03	9.85E-04	4.70E-04	1.71E-04	4.06E-04
BA-133	2.00E-05							
BA-139	2.00E-04			8.63E-06	2.47E-04			
BA-140	8.00E-06	6.90E-06		4.45E-05	6.13E-05			
CD-109	6.00E-06		6.33E-05	1.31E-04				
CE-139	7.00E-05							
CE-141	3.00E-05	1.31E-03		7.50E-04				
CE-144	3.00E-06		1.37E-03	2.08E-03	4.76E-04	1.59E-04	9.47E-06	9.64E-06
CO-56	6.00E-06							
CO-57	6.00E-05	2.52E-03	1.33E-04	3.21E-04	5.07E-05	6.90E-07	4.08E-06	
CO-58	2.00E-05	4.05E-01	9.02E-03	3.36E-02	6.81E-03	3.12E-03	3.25E-04	2.93E-03
CO-60	3.00E-06	2.88E-01	2.85E-02	6.34E-02	2.04E-02	1.54E-02	1.41E-03	5.53E-03
CR-51	5.00E-04	2.71E-02	3.16E-04	1.58E-02	5.31E-05	4.44E-04	8.71E-05	
CS-134	9.00E-07	4.76E-02	6.92E-03	1.18E-03	4.96E-04			1.49E-03
CS-134M	2.00E-03				3.59E-04	5.97E-06		4.67E-04
CS-136	6.00E-06							
CS-137	1.00E-06	9.60E-02	2.11E-02	7.54E-03	8.63E-03	2.80E-03	1.94E-03	8.93E-03
CS-138	4.00E-04	1.11E-03	5.48E-03	3.24E-03				
F-18	7.00E-04		1.00E-02	1.67E-02	7.56E-04	1.66E-03	2.26E-03	4.06E-04
FE-59	1.00E-05			2.76E-04				
LA-140	9.00E-06							
MN-54	3.00E-05	7.46E-03	1.18E-03	4.68E-03	1.54E-04	2.68E-04	3.10E-05	1.96E-04
M0-99	2.00E-05				3.70E-05			
NB-95	3.00E-05	6.28E-03	6.65E-04	3.21E-03	1.61E-04	2.33E-06	8.68E-05	
NB-97	3.00E-04	1.35E-03	5.22E-04	6.16E-05	1.06E-05	3.90E-06	8.80E-06	5.30E-06
RB-88	4.00E-04	8.46E-05	1.11E-02	3.33E-03				
RB-89	9.00E-04		7.98E-04	2.34E-04				
RU-103	3.00E-05	3.59E-03	1.68E-06	8.41E-04	5.86E-05			
RU-106	3.00E-06	8.07E-04	2.88E-03	7.33E-03	1.04E-04			
SB-124	7.00E-06	3.86E-02	2.96E-04	1.42E-04	2.34E-04			
SB-125	3.00E-05	1.12E-02	1.20E-03	1.95E-03	1.00E-03	2.12E-02	1.28E-05	1.08E-02
SN-113	3.00E-05	1.07E-03	4.20E-05	5.13E-04	3.21E-04			3.07E-06
SR-89	8.00E-06	2.27E-04	3.46E-05	3.89E-03	2.68E-03	8.69E-06		
SR-90	5.00E-07	1.29E-03	2.28E-04	2.80E-04	3.50E-04	2.55E-04		
TC-99M	1.00E-03	1.75E-05	3.75E-06		3.30E-05			
TC-101	2.00E-03			1.10E-05				
TE-131	8.00E-05				7.98E-05			
TE-132	9.00E-06	5.83E-07	6.94E-05	2.74E-05	7.19E-06			1.74E-04
W-187	3.00E-05				3.41E-05			
Y-91M	2.00E-03							
ZN-65	5.00E-06			5.15E-05				
ZR-95	2.00E-05	7.95E-05	2.61E-04	2.45E-03		1.58E-05		
ZR-97	9.00E-06	1.49E-06	3.09E-06		1.74E-05			
TOTAL CI		8.06E+02	8.12E+02	7.10E+02	3.57E+02	5.59E+02	8.72E+02	7.87E+02
TOTAL W/O H-3		1.37E+00	5.39E-01	5.12E-01	5.99E-02	5.65E-02	9.57E-03	5.42E-02

TABLE A-2
FRACTIONAL MEC IN LIQUID EFFLUENT

NUCLIDE	MEC uCi/cc	1985	1986	1987	1988	1989	1990	1991
H-3	1.00E-03	1.27E-03	1.25E-03	1.04E-03	5.17E-04	8.36E-04	1.26E-03	1.22E-03
I-131	1.00E-06	1.61E-04	5.75E-05	1.52E-05	2.03E-06	2.65E-06	2.21E-07	2.84E-06
I-132	1.00E-04	9.70E-07	1.12E-06	8.53E-07	1.49E-08	1.22E-08	6.43E-10	1.46E-07
I-133	7.00E-06	2.86E-05	3.27E-05	2.18E-05	2.51E-06	1.73E-06	6.21E-07	2.24E-06
I-134	4.00E-04	1.25E-07	1.69E-07	1.46E-07	8.30E-10			2.65E-09
I-135	3.00E-05	5.47E-06	6.87E-06	6.01E-06	2.16E-08			4.24E-08
AG-110M	6.00E-06	6.70E-09	7.28E-08	7.55E-07	2.38E-07	1.17E-07	4.12E-08	1.05E-07
BA-133	2.00E-05							
BA-139	2.00E-04			6.33E-11	1.79E-09			
BA-140	8.00E-06	1.36E-09	0.00E+00	8.16E-09	1.11E-08			
CD-109	6.00E-06		1.62E-08		3.16E-08			
CE-139	7.00E-05							
CE-141	3.00E-05	6.89E-08		3.67E-08				
CE-144	3.00E-06		7.03E-07	1.02E-06	2.30E-07	7.92E-08	4.56E-09	4.98E-09
CO-56	6.00E-06							
CO-57	6.00E-05	6.62E-08	3.41E-09	7.84E-09	1.22E-09	1.72E-11	9.83E-11	
CO-58	2.00E-05	3.19E-05	6.94E-07	2.46E-06	4.93E-07	2.33E-07	2.35E-08	2.27E-07
CO-60	3.00E-06	1.51E-04	1.46E-05	3.10E-05	9.86E-06	7.67E-06	6.79E-07	2.86E-06
CR-51	5.00E-04	8.55E-08	9.72E-10	4.63E-08	1.54E-10	1.33E-09	2.52E-10	
CS-134	9.00E-07	8.34E-05	1.18E-05	1.92E-06	7.99E-07			2.57E-06
CS-134M	2.00E-03				2.60E-10	4.46E-12		3.62E-10
CS-136	6.00E-06							
CS-137	1.00E-06	1.51E-04	3.25E-05	1.11E-05	1.25E-05	4.19E-06	2.80E-06	1.38E-05
CS-138	4.00E-04	4.38E-09	2.11E-08	1.19E-08				
F-18	7.00E-04		2.20E-08	3.50E-08	1.57E-09	3.54E-09	4.67E-09	8.99E-10
FE-59	1.00E-05			4.05E-08				
LA-140	9.00E-06							
MN-54	3.00E-05	3.92E-07	6.05E-08	2.29E-07	7.44E-09	1.34E-08	1.49E-09	1.01E-08
M0-99	2.00E-05				2.68E-09			
NB-95	3.00E-05	3.30E-07	3.41E-08	1.57E-07	7.78E-09	1.16E-10	4.18E-09	
NB-97	3.00E-04	7.10E-09	2.68E-09	3.01E-10	5.12E-11	1.94E-11	4.24E-11	2.74E-11
RB-88	4.00E-04	3.34E-10	4.27E-08	1.22E-08				
RB-89	9.00E-04		1.36E-09	3.81E-10				
RU-103	3.00E-05	1.89E-07	8.62E-11	4.11E-08	2.83E-09			
RU-106	3.00E-06	4.24E-07	1.48E-06	3.58E-06	5.02E-08			
SB-124	7.00E-06	8.70E-06	6.51E-08	2.97E-08	4.84E-08			
SB-125	3.00E-05	5.89E-07	6.15E-08	9.53E-08	4.83E-08	1.06E-06	6.17E-10	5.58E-07
SN-113	3.00E-05	5.63E-08	2.15E-09	2.51E-08	1.55E-08			1.59E-10
SR-89	8.00E-06	4.48E-08	6.65E-09	7.13E-07	4.86E-07	1.62E-09		
SR-90	5.00E-07	4.07E-06	7.02E-07	8.21E-07	1.01E-06	7.62E-07		
TC-99M	1.00E-03	2.76E-11	5.77E-12		4.78E-11			
TC-101	2.00E-03			8.06E-12				
TE-131	8.00E-05				1.45E-09			
TE-132	9.00E-06	1.02E-10	1.19E-08	4.46E-09	1.16E-09			3.00E-08
W-187	3.00E-05				1.65E-09			
Y-91M	2.00E-03							
ZN-65	5.00E-06			1.51E-08				
ZR-95	2.00E-05	6.27E-09	2.01E-08	1.80E-07			1.14E-09	
ZR-97	9.00E-06	2.61E-10	5.28E-10		2.80E-09			

TABLE A-2, (cont.)
FRACTIONAL MEC IN LIQUID EFFLUENT

	1985	1986	1987	1988	1989	1990	1991
ANNUAL VOL(CCs)	6.34E+14	6.50E+14	6.82E+14	6.90E+14	6.69E+14	6.92E+14	6.45E+14
TOT FRACTION	1.90E-03	1.41E-03	1.14E-03	5.48E-04	8.54E-04	1.26E-03	1.25E-03
FRACT W/O H-3	6.29E-04	1.61E-04	9.83E-05	3.04E-05	1.85E-05	4.41E-06	2.55E-05
TOTAL CI	8.06E+02	8.12E+02	7.10E+02	3.57E+02	5.59E+02	8.72E+02	7.87E+02
TOTAL W/O H-3	1.37E+00	5.39E-01	5.12E-01	5.99E-02	5.65E-02	9.57E-03	5.42E-02
TOT CONC(uCi/CC)	1.27E-06	1.25E-06	1.04E-06	5.17E-07	8.36E-07	1.26E-06	1.22E-06
TCON W/O H-3	2.16E-09	8.30E-10	7.51E-10	8.69E-11	8.44E-11	1.38E-11	8.40E-11
EMEC	6.70E-04	8.86E-04	9.14E-04	9.45E-04	9.78E-04	9.97E-04	9.80E-04
EMEC W/O H-3	3.43E-06	5.14E-06	7.64E-06	2.85E-06	4.56E-06	3.14E-06	3.30E-06

APPENDIX B

DERIVATION OF ATMOSPHERIC RELEASE MODE

EFFECTIVE MAXIMUM EFFLUENT CONCENTRATION

B.1.0 Derivation of Atmospheric Release Effective Maximum Effluent Concentration

B1.1 Source Term

The effective maximum effluent concentration (EMEC) for atmospheric effluents is calculated from the annual releases for the years 1985-1991 (Table B-1). Unlike liquid releases, tritium was not omitted from the EMEC calculation. Instead, the EMEC was calculated with H-3 and then modified by the fraction of non-tritium radionuclides in the effluent.

B1.2 Effective Maximum Effluent Concentration

The maximum concentration of a radionuclide mixture that is allowable at the site boundary is called the effective maximum effluent concentration (EMEC). The EMEC for an effluent mixture is defined by the equation

$$EMEC = \Sigma C_i \ / \ \Sigma(C_i \ / \ MEC_i)$$

where

C_i = concentration of radionuclide "i"

MEC_i = maximum effluent concentration for radionuclide "i" from 10 CFR 20, Appendix B, Table 2, Column 1

$\Sigma (C_i \ / \ MEC_i)$ = summation of fractions (SOF), as discussed in Section 3.6, applied to atmospheric releases

The EMEC is calculated from the reference radionuclide mixture which is the radionuclides released during the years 1985 - 1991. The average annual site boundary concentration for each year was calculated using the highest annual average χ/Q of 1.56E-06 sec/m^3. Then the total EMEC was calculated for each year (Table C-2). The average total EMEC is 8.04E-08±1.31E-08 μCi/cc with a range of 5.84E-08 to 9.50E-08 μCi/cc. Next, the annual EMEC was modified for the presence of H-3, which is not detected by the atmospheric RMS, by multiplying each EMEC by the ratio of the non H-3 concentration to the total concentration. The annual H-3 corrected EMECs were averaged to obtain a value of 1.92E-08±1.23E-08 μCi/cc with a range of 5.02E-09 to 3.70E-08 μCi/cc.

TABLE B-1
CURIES IN ATMOSPHERIC EFFLUENT

NUCLIDE	MEC uCi/ml	1985	1986	1987	1988	1989	1990	1991
H-3	1.00E-07	6.71E+01	1.20E+02	1.18E+02	1.26E+02	1.42E+02	1.28E+02	1.13E+02
AR-41	1.00E-08	1.27E+00	6.81E-01	2.17E+00	1.96E+00	1.57E+00	1.11E+00	1.07E+00
KR-85M	1.00E-07	1.84E+01	6.77E-01	1.18E+00	7.31E-01	2.24E-01	1.85E-01	1.03E-01
KR-85	7.00E-07	1.67E+01	1.32E+00	7.11E-01	9.84E-01	3.58E-01	1.78E-01	2.74E-01
KR-87	2.00E-08	4.78E+00	1.01E+00	2.37E+00	1.48E+00	4.94E-01	4.05E-01	2.31E-01
KR-88	9.00E-09	5.73E+00	1.30E+00	2.72E+00	1.69E+00	5.64E-01	4.49E-01	2.56E-01
XE-131M	2.00E-06	8.54E-02						
XE-133M	6.00E-07	3.30E-01	1.38E-01	2.12E-01	3.35E-01	4.94E-03	2.06E-02	3.97E-02
XE-133	5.00E-07	3.45E+01	1.53E+01	2.06E+01	6.04E+01	7.54E+00	1.96E+00	1.60E+01
XE-135M	4.00E-08	5.76E+00	1.27E+00	3.68E+00	2.54E+00	7.37E-01	6.49E-01	3.44E-01
XE-135	7.00E-08	1.19E+01	3.21E+00	5.64E+00	3.53E+00	1.08E+00	1.09E+00	6.03E-01
XE-138	2.00E-08	1.65E+01	2.91E+00	8.87E+00	7.19E+00	2.45E+00	1.99E+00	1.06E+00
AG-110M	1.00E-10				2.31E-07			
BA-133	9.00E-10							
BA-139	4.00E-08							1.17E-07
BA-140	2.00E-09			3.41E-07				
CD-109	2.00E-10	8.92E-06	1.26E-06	2.28E-04				
CE-139	9.00E-10							
CE-141	8.00E-10	8.48E-09						
CE-144	2.00E-11		2.04E-06			3.92E-07		3.94E-09
CO-57	9.00E-10	2.10E-07		2.52E-11	1.13E-08		1.23E-06	4.80E-07
CO-58	1.00E-09	1.57E-04	1.33E-05	1.01E-04	3.59E-05	1.69E-04	2.74E-05	3.85E-06
CO-60	5.00E-11	7.94E-05	1.11E-04	1.18E-05	3.64E-04	1.63E-04	3.56E-06	1.06E-04
CR-51	3.00E-08					5.28E-04		7.58E-09
CS-134	2.00E-10	1.18E-03	9.49E-04	5.86E-05	7.27E-05			1.10E-03
CS-136	9.00E-10							
CS-137	2.00E-10	4.02E-03	2.94E-04	3.08E-04	6.74E-04	2.10E-03	1.91E-04	1.90E-03
CS-138	8.00E-08	9.64E-07	1.92E-06	1.85E-03	1.26E-07	3.44E-06		1.92E-02
F-18	1.00E-07		1.08E-05	2.52E-04	3.87E-05	3.31E-04	1.10E-05	6.60E-04
FE-59	7.00E-10							4.87E-09
MN-54	1.00E-09	1.99E-06	1.70E-06		4.86E-05			
M0-99	2.00E-09			7.27E-09	2.71E-08			
NA-24	7.00E-09	1.39E-04		4.32E-04	4.29E-04			
NB-95	2.00E-09	2.52E-06	7.70E-07	5.97E-07	6.25E-08		9.56E-10	
NB-97	1.00E-07				1.60E-08			1.65E-09
RB-88	9.00E-08	4.63E-05	3.46E-05	1.03E-02	4.00E-06	1.81E-05		1.62E-01
RB-89	2.00E-07					4.30E-09		
RU-103	9.00E-10	1.91E-08	1.89E-05					
SB-125	7.00E-10	1.25E-07		3.68E-06	9.39E-08			
SN-113	8.00E-10	2.16E-08			4.80E-10			
SR-89	2.00E-10	4.87E-08	1.54E-06	7.70E-07	3.71E-06			
SR-90	6.00E-12			1.68E-10	4.30E-06			
SR-91	5.00E-09							
TC-99M	3.00E-07			6.43E-08	2.20E-07	9.24E-07		
TC-101	5.00E-07							
TE-132	9.00E-10				3.07E-06	7.33E-08		2.34E-06
Y-88	3.00E-10			1.28E-10				
ZN-65	4.00E-10				9.27E-06			
ZR-95	4.00E-10	1.31E-06			3.56E-09		7.43E-10	
ZR-97	2.00E-09	2.97E-10						

TABLE B-1, (cont.)
CURIES IN ATMOSPHERIC EFFLUENT

NUCLIDE	MEC uCi/ml	1985	1986	1987	1988	1989	1990	1991
I-131	2.00E-10	3.44E-03	1.11E-03	3.08E-03	5.43E-04	3.18E-04	7.85E-05	3.46E-04
I-132	2.00E-08	3.75E-03	1.79E-03	2.42E-03	4.78E-04	4.20E-05	1.09E-05	2.95E-05
I-133	1.00E-09	1.37E-03	6.80E-04	3.04E-03	1.53E-03	1.19E-03	1.13E-04	1.13E-04
I-134	6.00E-08	1.33E-05		9.32E-04				
I-135	6.00E-09	5.79E-04	1.09E-04	2.19E-03	9.18E-05	1.26E-05	3.15E-08	1.58E-05

TABLE B-2
FRACTIONAL MEC FOR ATMOSPHERIC EFFLUENT

NUCLIDE	1985	1986	1987	1988	1989	1990	1991
H-3	3.20E-05	5.71E-05	5.62E-05	6.00E-05	6.76E-05	6.10E-05	5.38E-05
AR-41	6.05E-06	3.24E-06	1.03E-05	9.33E-06	7.48E-06	5.29E-06	5.10E-06
KR-85M	8.76E-06	3.22E-07	5.62E-07	3.48E-07	1.07E-07	8.81E-08	4.90E-08
KR-85	1.14E-06	8.98E-08	4.84E-08	6.69E-08	2.44E-08	1.21E-08	1.86E-08
KR-87	1.14E-05	2.40E-06	5.64E-06	3.52E-06	1.18E-06	9.64E-07	5.50E-07
KR-88	3.03E-05	6.88E-06	1.44E-05	8.94E-06	2.98E-06	2.38E-06	1.35E-06
XE-131M	2.03E-09						
XE-133M	2.62E-08	1.10E-08	1.68E-08	2.66E-08	3.92E-10	1.63E-09	3.15E-09
XE-133	3.29E-06	1.46E-06	1.96E-06	5.75E-06	7.18E-07	1.87E-07	1.52E-06
XE-135M	6.86E-06	1.51E-06	4.38E-06	3.02E-06	8.77E-07	7.73E-07	4.10E-07
XE-135	8.10E-06	2.18E-06	3.84E-06	2.40E-06	7.35E-07	7.41E-07	4.10E-07
XE-138	3.93E-05	6.93E-06	2.11E-05	1.71E-05	5.83E-06	4.74E-06	2.52E-06
AG-110M				1.10E-10			
BA-139							1.39E-13
BA-140			8.12E-12				
CD-109	2.12E-09	3.00E-10	5.43E-08				
CE-141	5.05E-13						
CE-144		4.86E-09			9.33E-10		9.38E-12
CO-57	1.11E-11		1.33E-15	5.98E-13		6.51E-11	2.54E-11
CO-58	7.48E-09	6.33E-10	4.81E-09	1.71E-09	8.05E-09	1.30E-09	1.83E-10
CO-60	7.56E-08	1.06E-07	1.12E-08	3.47E-07	1.55E-07	3.39E-09	1.01E-07
CR-51					8.38E-10		1.20E-14
CS-134	2.81E-07	2.26E-07	1.40E-08	1.73E-08			2.62E-07
CS-136							
CS-137	9.57E-07	7.00E-08	7.33E-08	1.60E-07	5.00E-07	4.55E-08	4.52E-07
CS-138	5.74E-13	1.14E-12	1.10E-09	7.50E-14	2.05E-12		1.14E-08
F-18		5.14E-12	1.20E-10	1.84E-11	1.58E-10	5.24E-12	3.14E-10
FE-59							3.31E-13
MN-54	9.48E-11	8.10E-11		2.31E-09			
M0-99			1.73E-13	6.45E-13			
NA-24	9.46E-10		2.94E-09	2.92E-09			
NB-95	6.00E-11	1.83E-11	1.42E-11	1.49E-12		2.28E-14	
NB-97				7.62E-15			7.86E-16
RB-88	2.45E-11	1.83E-11	5.45E-09	2.12E-12	9.58E-12		8.57E-08
RB-89					1.02E-15		
RU-103	1.01E-12	1.00E-09					
SB-125	8.50E-12		2.50E-10	6.39E-12			
SN-113	1.29E-12			2.86E-14			
SR-89	1.16E-11	3.67E-10	1.83E-10	8.83E-10			
SR-90			1.33E-12	3.41E-08			
SR-91							
TC-99M			1.02E-14	3.49E-14	1.47E-13		
TC-101							
TE-132				1.62E-10	3.88E-12		1.24E-10
Y-88			2.03E-14				
ZN-65				1.10E-09			
ZR-95	1.56E-10			4.24E-13		8.85E-14	
ZR-97	7.07E-15						

TABLE B-2, (cont.)
FRACTIONAL MEC FOR ATMOSPHERIC EFFLUENT

NUCLIDE	1985	1986	1987	1988	1989	1990	1991
I-131	8.19E-07	2.64E-07	7.33E-07	1.29E-07	7.57E-08	1.87E-08	8.24E-08
I-132	8.93E-09	4.26E-09	5.76E-09	1.14E-09	1.00E-10	2.60E-11	7.02E-11
I-133	6.52E-08	3.24E-08	1.45E-07	7.29E-08	5.67E-08	5.38E-09	5.38E-09
I-134	1.06E-11		7.40E-10				
I-135	4.60E-09	8.65E-10	1.74E-08	7.29E-10	1.00E-10	2.50E-13	1.25E-10
TOTALFRAC	1.49E-04	8.29E-05	1.20E-04	1.11E-04	8.83E-05	7.62E-05	6.67E-05
TOTAL-H3	1.17E-04	2.57E-05	6.34E-05	5.13E-05	2.07E-05	1.52E-05	1.29E-05
EFF MEC	5.84E-08	8.49E-08	6.62E-08	8.85E-08	8.46E-08	8.50E-08	9.50E-08
W/O H-3	3.70E-08	1.60E-08	1.92E-08	3.46E-08	8.10E-09	5.02E-09	1.44E-08

APPENDIX C

CALCULATION OF TOTAL DOSE FACTORS

USING

REGULATORY GUIDE 1.109, REV. 1

C.1.0 Calculation of Total Dose Factors Using Regulatory Guide 1.109 Methodology

C.1.1 Liquid Release Dose Factors

The equations and values used to calculate the total dose to the maximum exposed individual for each of the liquid release mode pathways evaluated according to Regulatory Guide 1.109, Rev. 1, 1977 methodology is shown below. The total dose factor in mrem/Ci released is the sum of all pathway doses in mrem/Ci for the following pathways: milk, meat, fish, potable water, and shoreline deposits. The results for an organ is summed for each pathway and the total presented by age group and target organ in a matrix format for each radionuclide in Section 5, Table 5.1.1. The derivation of dilution factors used in the calculations is presented in Appendix D. The highest dose in each matrix is used as the dose tracking factor to be used for the monthly tracking of release doses. These values are found in Section 5, Table 5.2.

Note that all of the liquid release dose calculations assume that the discharge rate is 677,000 gpm. Whenever the average discharge rate for the month or year differs, the final dose calculated must be multiplied by the correction factor CF where:

CF = 677,000 gpm / actual average discharge gpm

This correction will produce a greater change during the winter months when the circ water flow rates are lower.

C1.1.1 Aquatic Foods

The dose from the eating of fresh fish caught at the edge of the initial mixing zone was calculated using the equation:

$$Dose_{apj} = 1100 \frac{M_p U_{ap}}{F} \sum_i Q_i B_{ip} D_{aipj} e^{-\lambda_i t_p}$$

where:

$Dose_{apj}$ = the dose to the organ j of an individual of age group a from all of the nuclides i in pathway p, in mrem/year;

1100 = a factor to convert from Ci-sec/yr-ft^3 to pCi/liter;

M_p = the mixing ratio (reciprocal of the dilution factor) at the point of harvest of aquatic food, dimensionless;

U_{ap} = a usage factor that specifies the intake rate for an individual of age group a associated with pathway p, in kg/year;

F = the flow rate of the liquid effluent, in ft^3/sec;

Q_i = the release rate of nuclide i, in Ci/year;

B_{ip} = the equilibrium bioaccumulation factor for nuclide i in pathway p, expressed as the ratio of the concentration in biota (in pCi/kg) to the radionuclide concentration in water (in pCi/l), in liters/kg;

D_{aipj} = the dose factor, specific to a given age group a, nuclide i, pathway p, and organ j, which is used to calculate the radiation dose from an intake of a nuclide, in mrem/pCi;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_p = the average transit time required for nuclides to reach the point of exposure. For internal dose, t_p is the total time elapsed between release of the nuclides and the ingestion of the water, in days.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{aipj}}{Q_i} = 1100 \frac{M_p U_{ap}}{F} B_{ip} D_{aipj} e^{-\lambda_i t_p}$$

The values used in the equation above are:

M_p = 0.1136 (Point of harvest of the fresh fish is taken at a point 1000 m downstream. The plume centerline dilution factor at this location is 8.8 using RG 1.111 methodology. The dilution factor calculations are attached. The factor of 2 allowed for current reversals was not used.);

U_{ap} = Infant - 0, Child - 6.9, Teen - 16, and Adult - 21 kg/year;

F = 1507 ft^3/sec. (677000 gpm);

B_{ip} = Values used are taken from Table A-1 of RG 1.109;

D_{aipj} = Values used are taken from Tables E-11 through E-14 of RG 1.109;

t_p = 0.5 days.

C1.1.2 Irrigated Foods (Meat From Watered Cattle)

The dose from the ingestion of meat from cattle which have been given contaminated water was calculated using the equation:

$$Dose_{apj} = 1100 \frac{M_p U_{ap} Q_{Aw}}{F} \sum_i Q_i F_{iA} D_{aipj} e^{-\lambda_i t_s}$$

where:

$Dose_{apj}$ = the dose to the organ j of an individual of age group a from all of the nuclides i in pathway p, in mrem/year;

1100 = factor to convert from Ci-sec/yr-ft^3 to pCi/liter;

U_{ap} = a usage factor that specifies the intake rate for an individual of age group a associated with pathway p, in kg/year;

M_p = the mixing ratio (reciprocal of the dilution factor) at the point of exposure, dimensionless;

Q_{Aw} = consumption rate of contaminated water by an animal, in liters/day;

F = the flow rate of the liquid effluent, in ft^3/sec;

Q_i = the release rate of nuclide i, in Ci/year;

F_{iA} = the stable element transfer coefficient that relates the daily intake rate by an animal to the concentration in an edible portion of animal product, in pCi/liter of meat per pCi/day;

D_{aipj} = the dose factor, specific to a given age group a, nuclide i, pathway p, and organ j, which is used to calculate the radiation dose from an intake of a nuclide, in mrem/pCi;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_s = the average time from slaughter to consumption, in days.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{aipj}}{Q_i} = 1100 \frac{M_p U_{ap} Q_{Aw}}{F} F_{iA} D_{aipj} e^{-\lambda_i t_s}$$

The values used in the equation above are:

M_p = 0.1111 (Point at which water is taken from the lake is taken as plume centerline 1 mile downstream. The plume centerline dilution factor at this location is 9 using RG 1.111 methodology.);

U_{ap} = Infant - 0, Child - 41, Teen - 65, and Adult - 110 kg/year;

Q_{Aw} = 60 liters/day;

F = 1507 ft^3/sec. (677000 gpm);

F_{iA} = Values used are taken from Table E-1 of RG 1.109;

D_{aipj} = Values used are taken from Tables E-11 through E-14 of RG 1.109;

t_s = 20 days.

C1.1.3 Irrigated Foods (Milk From Watered Cattle)

The dose from the ingestion of milk from cows which have been given contaminated water was calculated using the equation:

$$Dose_{apj} = 1100 \frac{M_p U_{ap} Q_{Aw}}{F} \sum_i Q_i F_{iA} D_{aipj} e^{-\lambda_i t_f}$$

where:

$Dose_{apj}$ = the dose to the organ j of an individual of age group a from all of the nuclides i in pathway p, in mrem/year;

1100 = factor to convert from Ci-sec/yr-ft^3 to pCi/liter;

M_p = the mixing ratio (reciprocal of the dilution factor) at the point of exposure, dimensionless;

U_{ap} = a usage factor that specifies the intake rate for an individual of age group a associated with pathway p, in liters/year;

Q_{Aw} = consumption rate of contaminated water by an animal, in liters/day;

F = the flow rate of the liquid effluent, in ft^3/sec;

Q_i = the release rate of nuclide i, in Ci/year;

F_{iA} = the stable element transfer coefficient that relates the daily intake rate by an animal to the concentration in an edible portion of animal product, in pCi/liter of milk per pCi/day;

D_{aipj} = the dose factor, specific to a given age group a, nuclide i, pathway p, and organ j, which is used to calculate the radiation dose from an intake of a nuclide, in mrem/pCi;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_f = the average transport time of the activity from the feed into the milk and to the receptor, in days.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{aipj}}{Q_i} = 1100 \frac{M_p U_{ap} Q_{Aw}}{F} F_{iA} D_{aipj} e^{-\lambda_i t_f}$$

The values used in the equation above are:

M_p = 0.1111 (Point at which water is taken from the lake is taken as plume centerline 1 mile downstream. The plume centerline dilution factor at this location is 9 using RG 1.111 methodology. the dilution factor calculations are attached. The factor of 2 allowed for current reversals was not used. This is a conservative assumption.);

U_{ap} = Infant - 330, Child - 330, Teen - 400, and Adult - 310 liters/year;

Q_{Aw} = 60 liters/day;

F = 1507 ft^3/sec. (677000 gpm);

F_{iA} = Values used are taken from Table E-1 of RG 1.109;

D_{aipj} = Values used are taken from Tables E-11 through E-14 of RG 1.109;

t_f = 2 days.

C1.1.4 Potable Water

The dose from ingestion of water was calculated using the equation:

$$Dose_{apj} = 1100\frac{M_p U_{ap}}{F} \sum_i Q_i D_{aipj} e^{-\lambda_i t_p}$$

where:

$Dose_{apj}$ = the dose to the organ j of an individual of age group a from all of the nuclides i in pathway p, in mrem/year;

1100 = a factor to convert from Ci-sec/yr-ft^3 to pCi/liter;

M_p = the mixing ratio (reciprocal of the dilution factor) at the point of withdrawal of drinking water, dimensionless;

U_{ap} = a usage factor that specifies the intake rate for an individual of age group a associated with pathway p, in l/year;

F = the flow rate of the liquid effluent, in ft^3/sec;

Q_i = the release rate of nuclide i, in Ci/year;

D_{aipj} = the dose factor, specific to a given age group a, nuclide i, pathway p, and organ j, which is used to calculate the radiation dose from an intake of a nuclide, in mrem/pCi;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_p = the average transit time required for nuclides to reach the point of exposure. For internal dose, t_p is the total time elapsed between release of the nuclides and the ingestion of the water, in days.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{aipj}}{Q_i} = 1100 \frac{M_p U_{ap}}{F} D_{aipj} e^{-\lambda_i t_p}$$

The values used in the equation above are:

M_p = 0.0384 (Withdrawal point is taken as the Two Rivers municipal water intake located a distance of 12 miles downstream. The plume centerline dilution factor at this location is 26 using RG 1.111 methodology and the factor of 2 allowed for current reversals. The dilution factor calculations are attached.);

U_{ap} = Infant - 330, Child - 510, Teen - 510, and Adult - 730 liters/year;

F = 1507 ft^3/sec. (677000 gpm);

D_{aipj} = Values used are taken from Tables E-11 through E-14 of RG 1.109

t_p = 2 days (This was calculated using a current speed of 12.2 cm/s plus 12 hours to reflect the transport of the water through the water purification plant and distribution system.)

C1.1.5 Shoreline Deposits

The dose from exposure to radioactive materials deposited on the shoreline of the lake was calculated using the equation:

$$Dose_{apj} = 110000 \frac{M_p U_{ap} W}{F} \sum_i Q_i T_i D_{aipj} e^{-\lambda_i t_p} \left(1 - e^{-\lambda_i t_b}\right)$$

where:

$Dose_{apj}$ = the dose to the organ j of an individual of age group a from all of the nuclides i in pathway p, in mrem/year;

110000 = a factor to convert from Ci-sec/yr-ft^3 to pCi/liter and to account for the proportionality constant used in the sediment radioactivity model;

M_p	=	the mixing ratio (reciprocal of the dilution factor) at the point of exposure, dimensionless;
U_{ap}	=	a usage factor that specifies the exposure time for an individual of age group a associated with pathway p, in hours/year;
W	=	shoreline width factor, dimensionless;
F	=	the flow rate of the liquid effluent, in ft^3/sec;
Q_i	=	the release rate of nuclide i, in Ci/year;
T_i	=	the radioactive half life of nuclide i, in days;
D_{aipj}	=	the dose factor, specific to a given age group a, nuclide i, pathway p, and organ j, which is used to calculate the radiation dose from an intake of a nuclide, in mrem/pCi;
λ_i	=	the radioactive decay constant of nuclide i, in day^{-1};
t_p	=	the average transit time required for nuclides to reach the point of exposure. For internal dose, t_p is the total time elapsed between release of the nuclides and the ingestion of the water, in days;
t_b	=	the period of time for which the sediment or soil is exposed to the contaminated water, in days.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{aipj}}{Q_i} = 110000 \frac{M_p U_{ap} W}{F} B_{ip} T_i D_{aipj} e^{-\lambda_i t_p} \left(1 - e^{-\lambda_i t_b}\right)$$

The values used in the equation above are:

M_p = 0.01821 (Point of exposure is taken as the Point Beach State Park beach which is located 8000 meters downstream. The plume shoreline dilution factor at this location is 54.9 using RG 1.111 methodology. The dilution factor calculations are attached. The factor of 2 allowed for current reversals was not used.);

U_{ap} = Infant - 0, Child - 14, Teen - 67, and Adult - 12 hours/year;

W = 0.3;

B_{ip} = Values used are taken from Table A-1 of RG 1.109;

F = 1507 ft^3/sec. (677000 gpm);

D_{aipj} = Values used are taken from Table E-6 of RG 1.109;

t_p = 0.5 day;

t_b = 5458 days.

C1.2 Atmospheric Release Dose Factors: Non-Gaseous

The equations and values used to calculate the total dose to the maximum exposed individual factors for non-gaseous radionuclides released to the atmosphere using Regulatory Guide 1.109, Rev. 1, 1977 is shown below. The total dose factor in mrem/Ci released is the sum of all airborne effluent doses in mrem/Ci for the following pathways: milk, meat, leafy vegetables, potable water, and shoreline deposits. A summary of totals is presented by age group and target organ in matrix format for each radionuclide in Section 5, Table 5-1. The highest dose in each matrix is used as the dose tracking factor to be used for the monthly tracking of release doses. These values are found in Section 5, Table 5-2.

Note that Section C1.2.1 applies to both tritium and particulates. Sections C1.2.2 through C1.2.6 apply only to particulates released to the atmosphere. Atmospheric tritium releases are treated differently. Sections C1.2.7 through C1.2.10 apply to tritium.

C1.2.1 Inhalation of Nuclides In Air

The dose from the inhalation of nuclides in the air was calculated using the equation:

$$Dose_{ja} = 3.17E+04\, R_a \left(\frac{\chi}{Q}\right) \sum_i Q_i\, DFI_{ija}$$

where:

$Dose_{ja}$ = the annual dose to organ j of an individual of age group a due to inhalation, in mrem/year;

3.17E+04 = the number of pCi/Ci divided by the number of sec/year;

R_a = the annual air intake for individuals in the age group a, in m^3/year;

χ/Q = the annual average atmosphere dispersion factor, in sec/m^3 (The location at which the dose was calculated was the site boundary in the south sector - a distance of 1270 meters.);

Q_i = the release rate of nuclide i, in Ci/year;

DFI_{ija} = the inhalation dose factor for radionuclide i, organ j, and age group a, mrem/pCi.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{ija}}{Q_i} = 3.17E+04 \; R_a \left(\frac{\chi}{Q}\right) DFI_{ija}$$

The values used in the equation above are:

R_a = Infant - 1400, Child - 3700, Teen - 8000, and Adult - 8000 m^3/year;

χ/Q = 9.36E-07 seconds/m^3 (This value taken from Table I.4-2 of the FSAR, release mode 1B, annual average, site boundary.);

DFI_{ija} = Values used are taken from Tables E-7 through E-10 of RG 1.109.

C1.2.2 Annual Organ Dose From External Irradiation From Nuclides Deposited On the Ground

The organ dose from external irradiation from nuclides deposited on the ground was calculated using the equation:

$$Dose_j = 1E+12 \; (8760) \; \delta_i \; S_F \sum_i \frac{Q_i\left(1 - e^{-\lambda_i t_b}\right)}{\lambda_i} DFG_{ij}$$

where:

$Dose_j$ = the annual dose to the organ j, in mrem/year;

1E+12 = the number of pCi per Ci;

8760 = the number of hours in a year;

δ_i = the annual average relative deposition of nuclide i, considering depletion of the plume during transport, in m^{-2}, (The location at which the dose is calculated is the site boundary in the south sector - a distance of 1300 meters.);

S_F = the attenuation factor that accounts for the dose reduction due to shielding provided by residential structures, dimensionless;

Q_i = the release rate of nuclide i, in Ci/year;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_b = the time period over which the accumulation is evaluated, in days;

DFG_{ij} = the open field ground plane dose conversion factor for organ j from nuclide i, in mrem-m^2/pCi-hour.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{ij}}{Q_i} = 1E+12\ (8760)\ \delta_i\ S_F \frac{\left(1 - e^{-\lambda_i t_b}\right)}{\lambda_i} DFG_{ij}$$

The values used in the equation above are:

δ_i = 31E-09 m^{-2} (This value taken from Table I.4-2 of the FSAR, release mode 1B, annual average, site boundary.);

S_F = 1 (No structural shielding is assumed.);

t_b = 5479 days (15 years);

DFG_{ij} = Values used are taken from Table E-6 of RG 1.109.

C1.2.3 Annual Organ Dose From Atmospherically Released Nuclides In Milk

The organ dose from atmospherically released nuclides in milk was calculated using the equation:

$$\text{Dose}_{ja} = 2.7\text{E}{+}09 \; U_a Q_F \delta_i \sum_i Q_i F_{im} DFI_{ija} e^{-\lambda_i t_f} \left\{ f_p f_s + e^{-90\lambda_i}\left(1 - f_p f_s\right) \right\} \times \left\{ \frac{r\left(1 - e^{-\lambda_{Ei} t_e}\right)}{Y_V \lambda_{Ei}} + \frac{B_{iv}\left(1 - e^{-\lambda_i t_b}\right)}{P \lambda_i} \right\}$$

where:

Dose_{ja} = the annual dose to the organ j of an individual in age group a from a dietary intake of atmospherically released nuclides, in mrem/year;

2.7E+09* = the number of pCi per Ci divided by the number of days per year;

U_a = the ingestion rate of milk for individuals in age group a, in liters/year;

Q_F = the amount of feed consumed by a cow per, in kg/day;

δ_i = the annual average relative deposition of nuclide i, considering depletion of the plume during transport, in m^{-2}, (The location at which the dose is calculated is the nearest animal location in the south-southeast sector - a distance of 1300 meters.);

Q_i = the release rate of nuclide i, in Ci/year;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_b = the time period over which the accumulation is evaluated, in days;

DFI_{ija} = the dose conversion factor for the ingestion of nuclide i, organ j, and age group a, in mrem/pCi;

F_{im} = the average fraction of the animal's daily intake of nuclide i which appears in each liter of milk, in days/liter;

t_f = the average transport time of the activity from the feed into the milk and to the receptor, in days;

f_p = the fraction of the year that the animals graze on pasture, dimensionless;

f_s = the fraction of the daily feed that is pasture grass when the animal grazes on pasture, dimensionless;

r = the fraction of the deposited activity retained on crops, dimensionless;

λ_{Ei} = the effective removal rate constant for nuclide i from crops, in days^{-1}, where $\lambda_{Ei} = \lambda_i + \lambda_w$, and λ_w is the removal rate constant for physical loss by weathering;

λ_w = 0.0504 day^{-1};

t_e = the time period that crops are exposed to contamination during the growing season, in days;

Y_V = the agricultural productivity, in kg (wet weight)/m^2;

B_{iv} = the concentration factor for the uptake of nuclide i in pathway p, expressed as the ratio of the concentration in biota (in pCi/kg) to the nuclide concentration in water (in pCi/liter), in liters/kg;

P = the effective surface density for soil, in kg (dry soil)/m^2.

* For iodines, this factor is changed to 1.4E+09.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{ija}}{Q_i} = 2.7E+9 \; U_a Q_F \delta_i \sum_i F_{im} DFI_{ija} e^{-\lambda_i t_f} \left\{ f_p f_s + e^{-90\lambda_i}\left(1 - f_p f_s\right)\right\} \times \left\{ \frac{r\left(1 - e^{-\lambda_{Ei} t_e}\right)}{Y_V \lambda_{Ei}} + \frac{B_{iv}\left(1 - e^{-\lambda_i t_b}\right)}{P \lambda_i} \right\}$$

The values used in the equation above are:

U_a = Infant - 330, Child - 330, Teen - 400, and Adult - 310 liters/year;

Q_F = 50 kg/day;

δ_i = 18.8E-09 m^{-2} (This value taken from Table I.4-2 of the FSAR, release mode 1B, grazing season, site boundary.);

F_{im} = Values used are taken from Table E-1 of RG 1.109;

DFI_{ija} = Values used are taken from Tables E-11 through E-14 of RG 1.109;

t_f = 2 days;

f_p = 0.5;

f_s = 0.5;

r = 0.25, 1.0 for iodines, and 0.20 for noble gases, tritium, and carbon-14;

t_e = 30 days;

Y_V = 0.7 kg/m^2;

B_{iv} = Values used are taken from Table E-1 of RG 1.109;

P = 240 kg/m^2;

t_b = 5458 days (15 years).

C1.2.4 Annual Organ Dose From Atmospherically Released Nuclides In Meat

The organ dose from atmospherically released nuclides in meat was calculated using the equation:

$$Dose_{ja} = 2.7E+9 \; U_a Q_F \delta_i \sum_i Q_i F_{if} DFI_{ija} e^{-\lambda_i t_s} \left\{ f_p f_s + e^{-90\lambda_i}\left(1 - f_p f_s\right)\right\} \times \left\{ \frac{r\left(1 - e^{-\lambda_{Ei} t_e}\right)}{Y_V \lambda_{Ei}} + \frac{B_{iv}\left(1 - e^{-\lambda_i t_b}\right)}{P \lambda_i} \right\}$$

where:

$Dose_{ja}$ = the annual dose to the organ j of an individual in age group a from a dietary intake of atmospherically released nuclides, in mrem/year;

$2.7E+9^*$ = the number of pCi per Ci divided by the number of days per year;

U_a = the ingestion rate of meat for individuals in age group a, in liters/year;

Q_F = the amount of feed consumed by a cow per, in kg/day;

δ_i = the annual average relative deposition of nuclide i, considering depletion of the plume during transport, in m^{-2}, (The location at which the dose is calculated is the nearest animal location in the south-southeast sector - a distance of 1300 meters.);

Q_i = the release rate of nuclide i, in Ci/year;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_b = the time period over which the accumulation is evaluated, in days;

DFI_{ija} = the dose conversion factor for the ingestion of nuclide i, organ j, and age group a, in mrem/pCi;

F_{if}	=	the average fraction of the animal's daily intake of nuclide i which appears in each kilogram of flesh, in days/kg;
t_s	=	the average time from slaughter to consumption, in days;
f_p	=	the fraction of the year that the animals graze on pasture, dimensionless;
f_s	=	the fraction of the daily feed that is pasture grass when the animal grazes on pasture, dimensionless;
r	=	the fraction of the deposited activity retained on crops, dimensionless;
λ_{Ei}	=	the effective removal rate constant for nuclide i from crops, in days^{-1}, where $\lambda_{Ei} = \lambda_i + \lambda_w$, and λ_w is the removal rate constant for physical loss by weathering;
t_e	=	the time period that crops are exposed to contamination during the growing season, in days;
Y_V	=	the agricultural productivity, in kg (wet weight)/m^2;
B_{iv}	=	the concentration factor for the uptake of nuclide i in pathway p, expressed as the ratio of the concentration in biota (in pCi/kg) to the nuclide concentration in water (in pCi/liter), in liters/kg;
P	=	the effective surface density for soil, in kg (dry soil)/m^2.

* For iodines, this factor is changed to 1.4E+09.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{ija}}{Q_i} = 2.7E+9\ U_a Q_F \delta_i \sum_i F_{if}\, DFI_{ija}\, e^{-\lambda_i t_s} \left\{ f_p f_s + e^{-90\lambda_i}\left(1 - f_p f_s\right)\right\} \times \left\{ \frac{r\left(1 - e^{-\lambda_{Ei} t_e}\right)}{Y_V \lambda_{Ei}} + \frac{B_{iv}\left(1 - e^{-\lambda_i t_b}\right)}{P \lambda_i} \right\}$$

The values used in the equation above are:

U_a = Infant - 0, Child - 41, Teen - 65, and Adult - 110 kg/year;

Q_F = 50 kg/day;

δ_i = 18.8E-09 m^{-2} (This value taken from Table I.4-2 of the FSAR, release mode 1B, grazing season, site boundary.);

F_{if} = Values used are taken from Table E-1 of RG 1.109;

DFI_{ija} = Values used are taken from Tables E-11 through E-14 of RG 1.109;

t_s = 20 days;

f_p = 0.5;

f_s = 1.0;

r = 0.25, 1.0 for iodines, and 0.20 for noble gases, tritium, and carbon-14;

t_e = 30 days;

B_{iv} = Values used are taken from Table E-1 of RG 1.109;

Y_V = 0.7 kg/m^2;

P = 240 kg/m^2;

λ_w = 0.0504 day^{-1};

t_b = 5458 days (15 years).

C1.2.5 Annual Organ Dose From Atmospherically Released Nuclides In Produce

The organ dose from atmospherically released nuclides in produce was calculated using the equation:

$$Dose_{ja} = 2.7E+9 \; U_a f_g \delta_i \sum_i Q_i \, DFI_{ija} \, e^{-\lambda_i t_h} \left\{ \frac{r\left(1 - e^{-\lambda_{Ei} t_e}\right)}{Y_V \lambda_{Ei}} + \frac{B_{iv}\left(1 - e^{-\lambda_i t_b}\right)}{P \lambda_i} \right\}$$

where:

$Dose_{ja}$ = the annual dose to the organ j of an individual in age group a from a dietary intake of atmospherically released nuclides, in mrem/year;

2.7E+9* = the number of pCi per Ci divided by the number of days per year;

U_a = the ingestion rate of produce for individuals in age group a, in kg/year;

f_g = fraction of produce ingested grown in garden of interest, dimensionless;

δ_i = the annual average relative deposition of nuclide i, considering depletion of the plume during transport, in m^{-2}, (The location at which the dose is calculated is the nearest garden location in the south-southwest sector - a distance of 1460 meters.);

Q_i = the release rate of nuclide i, in Ci/year;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_b = the time period over which the accumulation is evaluated, in days;

DFI_{ija} = the dose conversion factor for the ingestion of nuclide i, organ j, and age group a, in mrem/pCi;

t_h = the holdup time that represents the time interval between harvest and consumption of the food, in days;

r = the fraction of the deposited activity retained on crops, dimensionless;

λ_{Ei} = the effective removal rate constant for nuclide i from crops, in days^{-1}, where $\lambda_{Ei} = \lambda_i + \lambda_w$, and λ_w is the removal rate constant for physical loss by weathering;

t_e = the time period that crops are exposed to contamination during the growing season, in days;

Y_V = the agricultural productivity, in kg (wet weight)/m^2;

B_{iv} = the concentration factor for the uptake of nuclide i in pathway p, expressed as the ratio of the concentration in biota (in pCi/kg) to the nuclide concentration in water (in pCi/liter), in liters/kg;

P = the effective surface density for soil, in kg (dry soil)/m^2.

* For iodines, this factor is changed to 1.4E+09.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{ija}}{Q_i} = 2.7E+9\ U_a f_g \delta_i \sum_i DFI_{ija} e^{-\lambda_i t_h} \left\{ \frac{r\left(1 - e^{-\lambda_{Ei} t_e}\right)}{Y v \lambda_{Ei}} + \frac{B_{iv}\left(1 - e^{-\lambda_i t_b}\right)}{P \lambda_i} \right\}$$

The values used in the equation above are:

U_a = Infant - 0, Child - 520, Teen - 630, and Adult - 520 kg/year;

f_g = 0.76;

δ_i = 18.8E-09 m^{-2} (This value taken from Table I.4-2 of the FSAR, release mode 1B, growing season, site boundary.);

DFI_{ija} = Values used are taken from Tables E-11 through E-14 of RG 1.109;

t_h = 60 days;

r = 0.25, 1.0 for iodines, and 0.20 for noble gases, tritium, and carbon-14;

λ_w = 0.0504 day^{-1};

t_e = 60 days;

Y = 0.7 kg/m^2;

B_{iv} = Values used are taken from Table E-1 of RG 1.109;

P = 240 kg/m^2;

t_b = 5458 days (15 years).

C1.2.6 Annual Organ Dose From Atmospherically Released Nuclides In Leafy Vegetables

The organ dose from atmospherically released nuclides in leafy vegetables was calculated using the equation:

$$Dose_{ja} = 2.7E+9 \; U_a f_l \delta_i \sum_i Q_i DFI_{ija} e^{-\lambda_i t_h} \left\{ \frac{r(1 - e^{-\lambda_{Ei} t_e})}{Y_V \lambda_{Ei}} + \frac{B_{iv}(1 - e^{-\lambda_i t_b})}{P \lambda_i} \right\}$$

where:

$Dose_{ja}$ = the annual dose to the organ j of an individual in age group a from a dietary intake of atmospherically released nuclides, in mrem/year;

2.7E+9* = the number of pCi per Ci divided by the number of days per year;

U_a = the ingestion rate of produce for individuals in age group a, in kg/year;

f_l = fraction of leafy vegetables ingested grown in garden of interest, dimensionless;

δ_i = the annual average relative deposition of nuclide i, considering depletion of the plume during transport, in m^{-2}, (The location at which the dose is calculated is the nearest garden location in the south-southwest sector - a distance of 1460 meters.);

Q_i = the release rate of nuclide i, in Ci/year;

λ_i = the radioactive decay constant of nuclide i, in day^{-1};

t_b = the time period over which the accumulation is evaluated, in days;

DFI_{ija} = the dose conversion factor for the ingestion of nuclide i, organ j, and age group a, in mrem/pCi;

t_h = the holdup time that represents the time interval between harvest and consumption of the food, in days;

r = the fraction of the deposited activity retained on crops, dimensionless;

λ_{Ei} = the effective removal rate constant for nuclide i from crops, in days^{-1}, where $\lambda_{Ei} = \lambda_i + \lambda_w$, and λ_w is the removal rate constant for physical loss by weathering;

t_e = the time period that crops are exposed to contamination during the growing season, in days;

Y_V = the agricultural productivity, in kg (wet weight)/m^2;

B_{iv} = the concentration factor for the uptake of nuclide i in pathway p, expressed as the ratio of the concentration in biota (in pCi/kg) to the nuclide concentration in water (in pCi/liter), in liters/kg;

P = the effective surface density for soil, in kg (dry soil)/m^2.

* For iodines, this factor is changed to 1.4E+09.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_{ija}}{Q_i} = 2.7E{+}9\ U_a f_l \delta_i \sum_i DFI_{ija} e^{-\lambda_i t_h} \left\{ \frac{r\left(1 - e^{-\lambda_{Ei} t_e}\right)}{Y_V \lambda_{Ei}} + \frac{B_{iv}\left(1 - e^{-\lambda_i t_b}\right)}{P \lambda_i} \right\}$$

The values used in the equation above are:

U_a = Infant - 0, Child - 26, Teen - 42, and Adult - 64 kg/year;

f_l = 1;

δ_i = 18.8E-09 m^{-2} (This value taken from Table I.4-2 of the FSAR, release mode 1B, growing season, site boundary.);

DFI_{ija} = Values used are taken from Tables E-11 through E-14 of RG 1.109;

t_h = 1 day;

r = 0.25, 1.0 for iodines, and 0.20 for noble gases, tritium, and carbon-14;

λ_w = 0.0504 day^{-1};

t_e = 60 days;

Y_V = 0.7 kg/m^2;

B_{iv} = Values used are taken from Table E-1 of RG 1.109;

P = 240 kg/m^2;

t_b = 5458 days (15 years).

C1.2.7 Doses from Airborne Tritium other than Inhalation

The calculation methodolgy for doses from airborne H-3 via the meat, milk and vegetation pathways is different from that of particulates because tritium is a vapor and not a particle. The concentrations of tritium in vegetation are based on the concentrations found in the air surrounding the vegetation; and, all other vegetation based pathway doses are calculated from this quantity. The concentration in vegetation (forage, produce and leafy vegetables) is calculated from the formula (Reg. Guide 1.109, Rev. 1, p.1.109-27):

$$C_{tv} = 3.17E+07\ Q_T[\chi/Q](0.75)(0.5/H)$$

where:

Q_T = annual release rate of tritium in Ci/year;

$[\chi/Q]$ = annual average atmosphere dispersion factor, in sec/m^3 (The location at which the dose was calculated was the site boundary in the south sector, a distance of 1270m);

3.17E+07 = (1.0E+12 pCi/Ci) (1.0E+03 g/Kg) / (3.15E+07 sec/yr)

0.75 = fraction of plant mass which is water;

0.5 = fraction of concentration of tritium in plant water to concentration of tritium in atmospheric water;

H = absolute humidity of atmosphere in g/m^3

Inserting the following values into the formula:

$[\chi/Q]$ = 9.36E-07 sec/m^3 (from Table I.4-2 of the FSAR, release mode 1B, annual average site boundary);

H = 5.5 g/m^3 (from E. L. Entier (1980), Health Physics 39:318-320).

yields

$$C_{tv} = 2.0230\ Q_T$$

which then is used to calculate doses from leafy vegetables and produce as well as from milk and meat results for cattle ingestion of vegetation with the H-3 concentration.

C1.2.8 Annual Organ Dose from Atmospherically Released Tritium in Produce

Concentrations of tritium in vegetation are based on its concentration in the air surrounding the vegetation as defined above in C1.2.7. The doses are calculated using the equation:

$$Dose_{ja} = DFI_{ja}U_a f_g C_{tv}$$

where:

$Dose_{ja}$ = the annual dose to the organ j of an individual in age group a from a dietary intake of atmospherically released nuclides in mrem/yr;

DFI_{ja} = the dose conversion factor for the ingestion of tritium in organ j and age group a in mrem/yr;

U_a = ingestion rate for produce for individuals in age group a;

f_g = fraction of produce ingested;

C_{tv} = concentration of tritium in vegetation, defined as 2.023 Q_T.

To calculate the dose per curie released, the equation above is rearranged and the calculation performed. The rearranged equation is shown below:

$$\frac{Dose_{ja}}{Q_T} = 2.023\ DFI_{ja}U_af_g$$

The values used in the equation above are:

DFI_{ja} = values taken from Tables E-11 through E-14 of RG 1.109;

U_a = Infant-0, Child-520, Teen-630, Adult-520;

f_g = 0.76;

C1.2.9 Annual Organ Dose from Atmospherically Released Tritium in Milk

The organ dose is calculated using the equation:

$$Dose_{ja} = DFI_{ja}U_aC_{tm}$$

where C_{tm} is the concentration of tritium in milk which is calculated using the formula:

$$C_{tm} = F_mC_{tv}Q_F\exp(-\lambda_tt_f).$$

Substituting C_{tm} into the dose formula, the following equation results:

$$Dose_{ja} = DFI_{ja}U_aF_mC_{tv}Q_F\ \exp(-\lambda_tt_f)$$

where:

$Dose_{ja}$ = the annual dose to the organ j of an individual in age group a from a dietary intake of atmospherically released nuclides in mrem/yr;

DFI_{ja} = the dose conversion factor for the ingestion of tritium in organ j and age group a in mrem/yr;

U_a = ingestion rate for produce for individuals in age group a;

F_m = average fraction of animal's daily intake of tritium which appears in milk (days/liter);

C_{tv} = concentration of tritium in animal's feed (since the formula for the concentration of tritium in vegetation does not depend on time, there is no distinction made between pasture grass and stored feeds);

Q_F = amount of feed consumed by animal per day;

t_f = average transport time from feed into milk and to receptor;

λ_t = radiological decay constant for tritium.

To calculate the dose per curie released, the equation above is rearranged and the calculation performed. The rearranged equation is shown below:

$$\frac{Dose_{ja}}{Q_T} = 2.023\ DFI_{ja}U_aF_mQ_F\ \exp(-\lambda_t t_f)$$

The values used in the above equation are:

DFI_{ja} = values taken from Tables E-11 through E-14 of RG 1.109;

U_a = Infant-330, Child-330, Teen-400, Adult-310;

F_m = 1.0E-02 days/liter (from RG 1.109 Table E-1);

C_{tv} = 2.0230 Q_T pCi/g;

Q_F = 50 kg/day;

t_f = 2 days;

λ_t = 0.000154 days^{-1}.

C1.2.10 <u>Annual Organ Dose from Atmospherically Released Tritium in Meat</u>

The organ dose is calculated using the equation:

$$Dose_{ja} = DFI_{ja}U_aC_{tf}$$

where C_{tf} is defined as the concentration of tritium in meat which is calculated using the formula:

$$C_{tf} = F_f C_{tv}Q_F\ \exp(-\lambda_t t_s)$$

When this is inserted into the dose formula, the following equation results:

$$Dose_{ja} = DFI_{ja}U_aF_f C_{tv}Q_F\ \exp(-\lambda_t t_s)$$

where:

$Dose_{ja}$ = the annual dose to the organ j of an individual in age group a from a dietary intake of atmospherically released nuclides in mrem/yr;

DFI_{ja} = the dose conversion factor for the ingestion of tritium in organ j and age group a in mrem/yr;

U_a = ingestion rate for produce for individuals in age group a;

F_f = fraction of animal's daily intake of tritium which appears in each kilogram of flesh (days/kg);

C_{tv} = concentration of tritium in animal's feed (since the formula for the concentration of tritium in vegetation does not depend on time, there is no distinction made between pasture grass and stored feeds);

Q_F = amount of feed consumed by animal per day;

t_s = average time from slaughter to consumption;

λ_t = radiological decay constant for tritium.

To calculate the dose per curie released, the equation above is rearranged and the calculation performed. The rearranged equation is shown below:

$$\frac{Dose_{ja}}{Q_T} = 2.023\ DFI_{ja}U_aF_fQ_F\exp(-\lambda_t t_s)$$

The values used in the equation above are:

DFI_{ja} = values taken from Tables E-11 through E-14 of RG 1.109;

U_a = Infant-0, Child-41, Teen-65, Adult-110;

F_f = 1.2E-02 days/kg;

C_{tv} = 2.0230 Q_T pCi/g;

Q_F = 50 kg/day;

t_s = 20 days;

λ_t = 0.000154 $days^{-1}$.

C1.3 Atmospheric Release Dose Factors: Noble Gases

The equations and values used to calculate the total dose factors for noble gases released to the atmosphere using Regulatory Guide 1.109, Rev. 1, 1977 is shown below. The dose factor in mrem/Ci and mrad/Ci released for each radionuclide is presented in Section 5, Table 5-1.

C1.3.1 Annual Gamma and Beta Air Dose From All Noble Gas Releases

The dose from the submersion of individuals in air containing noble gases was calculated using the equation:

$$\text{Dose}^{\gamma} \text{ or } \text{Dose}^{\beta} = 3.17\text{E}{+}04\left(\frac{\chi}{Q}\right)\sum_{i} Q_i\left(DF_i^{\gamma} \text{ or } DF_i^{\beta}\right)$$

where:

Dose^{γ} or Dose^{β} = the annual gamma and beta air dose, in mrad/year;

3.17E+04 = the number of pCi/Ci divided by the number of sec/year;

χ/Q = the annual average atmosphere dispersion factor, in sec/m^3 (The location at which the dose was calculated was the site boundary in the south sector-a distance of 1270 meters.);

Q_i = the release rate of nuclide i, in Ci/year;

DF_i^{γ} or DF_i^{β} = the gamma and beta air dose factors for a uniform semi-infinite cloud of radionuclide i, in mrad-m^3/pCi-year.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_i^{\gamma} \text{ or } Dose_i^{\beta}}{Q_i} = 3.17E+04 \left(\frac{\chi}{Q}\right)\left(DF_i^{\gamma} \text{ or } DF_i^{\beta}\right)$$

The values used in the equation above are:

χ/Q = 9.36E-07 seconds/m^3 (This value taken from Table I.4-2 of the FSAR, release mode 1B, intermittent, annual average, site boundary.);

DE_i^{γ} or DF_i^{B} = Values used are taken from Table B-1 of RG 1.109.

C1.3.2 Annual Skin Dose From All Noble Gas Releases

The skin dose from the submersion of individuals in air containing noble gases was calculated using the equation:

$$Dose = 3.17E+04 \left(\frac{\chi}{Q}\right)\left(1.11 S_F \sum_i Q_i DF_i^{\gamma} + \sum_i Q_i DFS_i\right)$$

where:

Dose = the annual skin dose due to immersion in a semi-infinite cloud, in mrem/year;

3.17E+04 = the number of pCi/Ci divided by the number of sec/year;

1.11 = the average ratio of tissue to air energy absorption coefficients;

S_F = the attenuation factor that accounts for the dose reduction due to shielding provided by residential structures, dimensionless;

χ/Q = the annual average atmosphere dispersion factor, in sec/m^3 (The location at which the dose was calculated was the site boundary in the south sector - a distance of 1270 meters.);

Q_i = the release rate of nuclide i, in Ci/year;

DF_i^{γ} = the annual gamma air dose factor for a uniform semi-infinite cloud of nuclide i, in mrad-m^3/pCi-year;

DFS_i = the beta skin dose factor for a semi-infinite cloud of nuclide i, which includes the attenuation by 7 mg/cm^2 of skin, in mrem-m^3/pCi-year.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_i}{Q_i} = 3.17E+04 \left(\frac{\chi}{Q}\right)\left(1.11\ S_F DF_i^{\gamma} + DFS_i\right)$$

The values used in the equation above are:

S_F = 1 (No structural shielding is assumed.);

χ/Q = 9.36E-07 seconds/m^3 (This value taken from Table I.4-2 of the FSAR, release mode 1B, annual average, site boundary.);

DF_i^{γ} = Values used are taken from Table B-1 of RG 1.109;

DFS_i = Values used are taken from Table B-1 of RG 1.109.

C1.3.3 <u>Annual Total Body Dose From All Noble Gas Releases</u>

The total body dose from the submersion of individuals in air containing noble gases was calculated using the equation:

$$Dose = 3.17E+04\ S_F \left(\frac{\chi}{Q}\right) \sum_i Q_i DFB_i$$

where:

Dose = the annual total body dose due to immersion in a semi-infinite cloud, in mrem/year;

3.17E+04 = the number of pCi/Ci divided by the number of sec/year;

S_F = the attenuation factor that accounts for the dose reduction due to shielding provided by residential structures, dimensionless;

χ/Q = the annual average atmosphere dispersion factor, in sec/m^3 (The location at which the dose was calculated was the site boundary in the south sector - a distance of 1270 meters.);

Q_i = the release rate of nuclide i, in Ci/year;

DFB_i = the total body dose factor for a uniform semi-infinite cloud of nuclide i, which includes the attenuation of 5 g/cm^2 of tissue, in mrem-m^3/pCi-year.

To calculate the dose per curie released, the equation above was rearranged and the calculation performed for each nuclide. The rearranged equation is shown below:

$$\frac{Dose_i}{Q_i} = 3.17E+04\ S_F \left(\frac{\chi}{Q}\right) DFB_i$$

The values used in the equation above are:

S_F = 1 (No structural shielding is assumed.);

χ/Q = 9.36E-07 seconds/m^3 (This value taken from Table I.4-2 of the FSAR, release mode 1B, annual average, site boundary.);

DFB_i = Values used are taken from Table B-1 of RG 1.109.

APPENDIX D

DERIVATION OF DILUTION FACTORS

USING

REGULATORY GUIDE 1.113

D1.0 Liquid Effluent Dilution Factor Calculations

D1.1 Methodology

The dilution factors used for calculating the doses from liquid effluent released to Lake Michigan were calculated using the methodology of Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I." The parameters used in the calculation and the results of the calculation are given in Table D-1. The results are presented graphically in Figure D-1.

The centerline and shoreline values were calculated using Reg Guide 1.113 formulae 17 and 18 which apply to discharges to the Great Lakes. (The formulae are not presented here. See Section 5 of the PBNP FSAR for the formulae and origin of values used.) These results are applied as calculated for fish caught near PBNP. But for other pathways, an extra factor of two (2) is applied to account for current reversals which occur in Lake Michigan as described in the Appendix I, Section 5, of the PBNP FSAR.

TABLE D-1
SURFACE DILUTION FACTORS
LIQUID EFFLUENTS IN A LARGE LAKE

Downstream Distance (meters)	Plume Centerline	Shoreline
10	8.81	
20	8.81	
30	8.81	
40	8.81	
50	8.81	
60	8.81	
70	8.81	
80	8.81	
90	8.81	
100	8.81	
200	8.81	
300	8.81	
400	8.81	
500	8.81	
600	8.81	
700	8.81	
800	8.81	
900	8.81	
1000	8.81	122000
2000	8.86	1758
3000	9.01	401
4000	9.25	186
5000	9.53	116
6000	9.85	83.8
7000	10.2	65.9
8000	10.5	54.9
9000	10.8	47.4
10000	11.1	42.1
20000	14.0	24
30000	16.1	20.1
40000	17.7	18.7
50000	18.8	18.3
60000	19.6	18.2
70000	20.3	18.3
80000	20.9	18.6
90000	21.4	18.9
100000	21.9	19.2
200000	25.9	23.2
300000	29.2	26.9
400000	32.3	30.3
500000	35.2	33.3
600000	37.8	36.0
700000	40.2	38.6
800000	42.6	41.0
900000	44.8	43.3
1000000	46.9	45.5

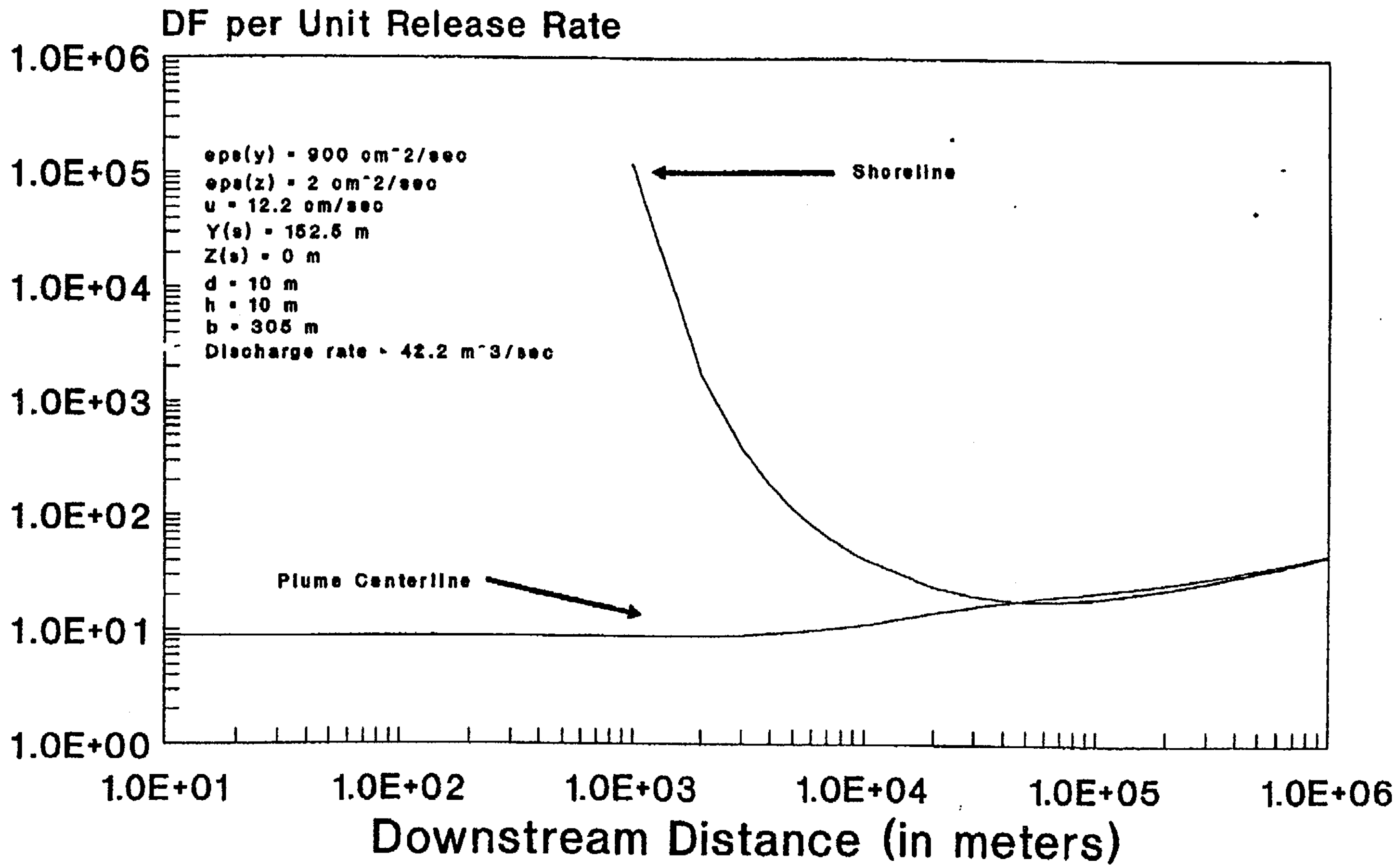
NOTE: *These values were calculated using the equation described in Section 5.2 of the PBNP FSAR and the following values:*

ϵ_y	=	*900 cm²/sec*	z_s	=	*0 meters*
ϵ_z	=	*2 cm²/sec*	d	=	*10 meters*
u	=	*12.2 cm/sec*	h	=	*10 meters*
y_s	=	*152.5 meters*	b	=	*305 meters*

and a discharge rate of 42.2 m^3/sec.

FIGURE D-1
DILUTION FACTOR AT SURFACE

Dilution Factor at Surface
Liquid Effluents in a Large Lake



Area source, width 305 m and height 10 m

D1.2 Dilution Factor Twelve Miles Downstream: Two Rivers Water Intake

The dilution factor used at the Two Rivers water intake twelve miles downstream from PBNP included the factor of two described in Section D1.1. However, instead of using the straight centerline dilution factor shown in Table 1, the weighted average dilution factor calculated over the width of the plume was used.

This approach was used for the following reasons. First, the path that the current takes to reach the Two Rivers water intake is not straight. In order to reach Two Rivers, the water must flow southeast around Point Beach State Park, which juts into Lake Michigan, and then curves back 90 degrees towards Two Rivers. As a result of this deviation from straight line flow, any part of the plume or possibly none of the plume would impinge upon the intake structure.

Second, there is a difference in the distance offshore of the PBNP discharge and the Two Rivers water intake. The Two Rivers water intake is located 5080 feet offshore. By contrast, PBNP discharges close to the shoreline through two flumes, one directed north and one directed south, and is modeled as a source that extends 1000 feet out into the lake from the shoreline.

Based on these two considerations, it was concluded that the weighted average dilution across the width of the plume as it diverges while flowing south would constitute a better estimate of the dilution factor instead of the calculated for the centerline of an area source as is assumed for the FSAR calculation. The calculation and the values used are shown below.

The average dilution factor at 12 miles downstream was calculated in the following manner:

1. The standard deviation of the radionuclide concentration in the y direction at 12 miles downstream on the surface of the lake was calculated. This calculation used the following formula:

$$\sigma_y = \sqrt{\frac{2 \times \varepsilon_y \times x}{u}}$$

where

ϵ_y = lateral turbulent diffusion coefficient in cm^2/sec

x = the downstream distance in cm

u = current in cm/sec

Substituting the values for $\in_y$, x, and u of 900 cm^2/sec, 19308 m, and 12.2 cm/sec, respectively, into the equation yields

$$\sigma_y = \frac{\sqrt{\dfrac{2 \times 900 \dfrac{cm^2}{sec} \times 19308\ m \times 100 \dfrac{cm}{m}}{12.2 \dfrac{cm}{sec}}}}{100 \dfrac{cm}{m}} = 168.8 \text{ meters}$$

2. At distances of 0.1σ, 0.2σ, etc., off the plume centerline, the dilution factor was calculated using the equation shown in Section 5.2 of the PBNP FSAR. The distances off the plume centerline, the calculated dilution factor, and the fraction of the area under the normal distribution curve is listed below.

Distance Off Plume Centerline

Fraction of Standard Deviation	Equivalent Distance (m)	Fraction of Total Area Under the Curve for Interval	Dilution Factor
0.1σ	16.9	0.080	13.8
0.2σ	33.8	0.080	14.0
0.3σ	50.6	0.078	14.3
0.4σ	67.5	0.075	14.7
0.5σ	84.4	0.072	15.2
0.6σ	101.3	0.068	15.8
0.7σ	118.1	0.065	16.6
0.8σ	135.0	0.060	17.6
0.9σ	151.9	0.056	18.8
1.0σ	168.8	0.051	20.2
1.1σ	185.6	0.046	21.9
1.2σ	202.5	0.042	23.9
1.3σ	219.4	0.037	26.3
1.4σ	236.3	0.032	29.2
1.5σ	253.2	0.028	32.6
1.75σ	295.4	0.053	44.7
2.0σ	337.6	0.035	64.7
2.25σ	379.8	0.021	98.4
2.5σ	421.9	0.012	158.4
3.0σ	506.3	0.010	482
Totals		1.00	

* It is assumed that the standard deviation of the radionuclide concentrations across the plume can be represented by a normal distribution curve. The fraction of the total area under the curve is that fraction of the area under the curve that lies between, for example, the interval 0.1σ and 0.2σ which also includes the area of the curve in the interval -0.1σ and -0.2σ.

The average dilution factor over the width of the plume was calculated by multiplying the dilution factor at each of the locations off of the plume centerline by the fraction of the total area of the curve occupied by that interval and then summing over all the intervals. An average dilution actor of 29 was calculated.

APPENDIX E

Wisconsin Electric submittal to the United States Nuclear Regulatory Commission, dated October 8, 1987 (VPNPD-87-430, NRC-87-104)

The submittal consists of the letter and two Attachments. Attachment II contains Appendices A-G.

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VPNPD-87-430
NRC-87-104

October 8, 1987

U.S. NUCLEAR REGULATORY COMMISSION
Document Control Desk
Washington, D.C. 20555

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
FOR 10 CFR 20.302 APPLICATION
POINT BEACH NUCLEAR PLANT

On July 14, 1987, Wisconsin Electric Power Company submitted an application, under the provisions of 10 CFR 20.302, for approval of a proposed procedure to dispose of sewage treatment sludge containing minute quantities of radioactive materials. Subsequent to the application, Mr. Ted Quay of the NRC staff requested additional information regarding the environmental characteristics of the area surrounding the Point Beach Nuclear Plant. The responses to this request were furnished in our submittal dated August 6, 1987.

By letter dated September 9, 1987, the NRC has requested Wisconsin Electric supply additional information in order to complete the review of our application. This Request for Additional Information (RAI) contains ten specific items which require responses or commitments from Wisconsin Electric. In addition, the NRC requests the previously submitted information and the information supplied in response to the RAI be compiled into "one complete, extensive, and self-contained package". To facilitate your review, Attachment I is included to provide direct responses to the ten items contained in the RAI. Attachment II is provided as the complete application, including the information from our letters dated July 14, 1987, and August 6, 1987, and information supplied in response to the NRC RAI.

We request that you complete your review of this complete, self-contained package and issue an approval of our application as soon as possible. In order to facilitate your review and to expedite processing, we would be pleased to discuss these matters or provide additional information by telephone. Please feel free to contact us.

Very truly yours,

C. W. Fay
Vice President
Nuclear Power

bjm

Attachments

Copies to NRC Resident Inspector
NRC Regional Administrator, Region III

Blind copies to Britt/Gorske/Finke, Burstein, Charnoff,
Fay, Krieser, Lipke, Newton, Zach

ATTACHMENT I

RESPONSES TO QUESTIONS CONTAINED IN THE REQUEST FOR ADDITIONAL INFORMATION (RAI) ON POINT BEACH 1 AND 2 REQUEST FOR DISPOSAL OF LOW LEVEL RADIOACTIVITY CONTAMINATED SEWAGE SLUDGE BY LAND APPLICATION WISCONSIN ELECTRIC POWER COMPANY UNDER 10 CFR 20.302(a)

The numbering system used in these responses corresponds directly to numbering used in the NRC RAI, dated September 9, 1987.

1. a. This request is for multiple applications, approximately 2 to 4 per year.
   b. This request is for multiple years, expiration to coincide with conclusion of decommissioning activities associated with retirement of PBNP Units 1 & 2.
   c. Please refer to the response to question number 10.

2. The pathways used to determine doses to both the maximally exposed individual and the inadvertent intruder are documented in Attachment II, Appendices D and E.

   Due to the extremely low concentrations of radionuclides in the sewage sludge and the associate low doses, Wisconsin Electric will control access to the disposal sites by conditions of use defined in lease agreements with the lease. Use of the land is not controlled beyond the conditions of the lease, thereby not restraining a casual visitor from the disposal site. However continuous occupancy would be readily observed, and remedial action would be taken.

3. Information contained in previous submittals has been included in Attachment II with modifications to provide specific commitments to the NRC.

4. Please refer to the response to question number 10.

5. Site maps have been updated and are included in Attachment II, Appendix C.

6. The direct grazing of cattle on the proposed disposal sites is controlled by restrictions contained in the lease agreement.

   There will be no restrictions placed on fishermen on Lake Michigan. Calculations of doses due to all pathways associated with a release to Lake Michigan (Attachment II, Appendix E) do not indicate a need to apply restrictions to fishermen.

7. Please refer to revised site maps included in Attachment II, Appendix C. Site number 5 is located on company owned land beyond the PBNP site boundary. All other sites are within the PBNP site boundary area.

8. a. Please refer to Attachment II, Section 3.2, Disposal Procedure.
   b. Please refer to Attachment II, Section 3.2, Disposal Procedure.
   c. Please refer to Attachment II, Section 3.2, Disposal Procedure.
   d. Please refer to Attachment II, Appendix A.

9. Please refer to Attachment II, including Appendix D and Appendix E for additional pathways analyzed for this submittal. These identified pathways will be analyzed prior to all subsequent disposals to insure doses are maintained within prescribed limits, i.e., 1 mrem/year to the maximally exposed individual and 5 mrem/year to the inadvertent intruder.

10. A limiting concentration level for the sludge contained in the storage tank is discussed, in Attachment II, Appendix F. Since this application is for multiple applications over multiple years, Attachment II, Appendix F also addresses an activity limit.

ATTACHMENT II

COMPLETE ANALYSIS AND EVALUATION
POINT BEACH NUCLEAR PLANT
10 CFR 20.302(a) APPLICATION

1.0 Purpose

By this submittal Wisconsin Electric Power Company requests approval of the U.S. Nuclear Regulatory Commission for a proposed procedure to dispose of sewage treatment sludge containing trace quantities of radionuclides generated at the Point Beach Nuclear Plant. This request is submitted in accordance with the provisions of 10 CFR 20.302(a).

2.0 Waste Description

The waste involved in this disposal process consists of the residual solids remaining in solution upon completion of the aerobic digestion sewage treatment process utilized at PBNP. The PBNP sewage treatment plant is used to process waste water from the plant sanitary and potable water systems. These systems produce non-radioactive waste streams with the possible exception of wash basins located in the radiologically controlled area of the plant. These wash basins are believed to be the primary source of the extremely small quantities of radionuclides in the sludge.

The sewage sludge generated at PBNP is allowed to accumulate in the sewage plant digestor and aeration basin. Two to four times annually, depending on work activities and corresponding work force at PBNP, the volume of the sludge in the digestor and aeration basin needs to be reduced to allow continued efficient operation of the treatment facility. The total volume of sludge removed during each disposal operation is typically on the order of 15,000 gallons. The maximum capacity for the entire PBNP treatment facility and hence the maximum disposal volume is about 30,000 gallons. In the case of a maximum capacity disposal, doses would not necessarily increase in proportion to the volume, since more than one disposal site may be used.

Trace amounts of radionuclides have been identified in PBNP sludge currently being stored awaiting disposal. The radionuclides identified and their concentrations in the sludge are summarized below:

Nuclide	Concentration (μCi/cc)
Co-60	2.33E-07
Cs-137	1.50E-07

The total activity of the radionuclides in the stored sludge, based on the identified concentrations and a total volume of 15,000 gallons of sewage sludge, are as follows:

Nuclide	Activity (μCi)
Co-60	13.2
Cs-137	8.5

These concentrations and activities are consistent with expected values based on prior analyses of sewage sludge. The radionuclide concentration in the sewage sludge has remained relatively constant during sampling conducted since December 30, 1983. A detailed summary of the results of this sampling program are contained in Appendix A for your review.

In addition to monitoring for the radionuclide content of the sludge, the WDNR requires several other physical and chemical properties of the sludge to be determined. These properties are the percent total solids, percent total nitrogen, percent ammonium nitrogen, pH, percent total phosphorus, percent total potassium, cadmium, copper, lead, nickel, mercury, zinc, and boron. An example of a typical sludge sample analysis is included in Appendix B.

3.0 Disposal Method

In the context of this application, Wisconsin Electric commits to the following methodology. No distinction is made or intended between "shall" or "will", as used in the descriptions contained in this section.

3.1 Transport of Sludge

The method used to dispose of the sludge shall utilize a technique approved by the WDNR. The process of transporting the sewage sludge for disposal involves pumping the sludge from the PBNP sewage treatment plant storage tanks into a truck mounted tank. The truck mounted tank shall be required to be maintained tightly closed to prevent spillage while in transit to the disposal site. The sludge shall be transported to one or more of the six sites approved by the WDNR for land application of the sewage sludge from PBNP.

3.2 Disposal Procedure

The radionuclide concentrations in the sludge shall be determined prior to each disposal by obtaining three representative samples from each of the sludge storage tanks. The sludge contained in the sludge tanks is prevented from going septic by a process known as complete mix and continuous aeration. This process completely mixes the sludge allowing for representative samples to be obtained.

The samples shall be counted utilizing a GeLi detector and multi-channel analyzer with appropriate geometry. The detection system is routinely calibrated and checked to ensure the lower limits of detection are within values specified in the Radiological Effluent Technical Specifications (RETS).

To insure the samples are representative of the overall concentration in the storage tanks, the radionuclide concentration determination for each of the three samples shall be analyzed to insure each sample is within two standard deviations of the average value of the three samples. If this criteria is not met, additional samples will be obtained and analyzed to insure a truly representative radionuclide concentration is utilized for dose calculations and concentration limit determinations. The average of all statistically valid concentration determinations will be utilized in determining the storage tank concentration values.

Prior to disposal the waste stream will be monitored to determine the physical and chemical properties of the sludge, as discussed in the last paragraph of Section 2.0, Waste Description. The results will be compared to State of Wisconsin limits to insure the sludge does not pose a chemical hazard to people or to the environment.

The radionuclides identified in the sludge, along with their respective concentrations, will be compared to concentration limits prior to disposal. The methodology discussed in Appendix F will be used in determining compliance with the proposed concentration limit. The total activity of the proposed disposal will be compared to the proposed activity limit as described in Appendix F.

If the concentration and activity limit criteria are met, the appropriate exposure pathways (as described in Appendix D) will be evaluated prior to each application of sludge. These exposures will be evaluated to insure the dose to the maximally exposed individual will be maintained less than 1 mrem/year and the dose to the inadvertent intruder is maintained less than 5 mrem/year. The exposures will be calculated utilizing the methodology used in Appendix E, including the current activity to be landspread along with the activity from all prior disposal. The remaining radioactivity from prior disposals will be corrected for radiological decay prior to performing dose calculations for the meat, milk, and vegetable ingestion pathways, the inhalation of resuspended radionuclides, and all pathways associated with a release to Lake Michigan. The residual radioactivity will be corrected for radiological decay and, if appropriate, the mixing of the radionuclides in the soil by plowing prior to performing external exposure calculations.

The sewage sludge is applied on the designated area of land utilizing the WDNR approved technique and adhering to the following requirements of WPDES Permit Number WI-0000957-3.

- Discharge to the land disposal system shall be limited so that during surface spreading all of the sludge and any precipitation falling onto or flowing onto the disposal field shall not overflow the perimeter of the system.
- Sludge shall not be land spread on land with a slope greater than 12%. During the period from December 15 through March 31 sludge shall not be land spread on land with a slope greater than 6% unless the wastes are injected immediately into the soil.
- Sludge shall not be surface spread closer than 500 feet from the nearest inhabited dwelling except that this distance may be reduced with the dwelling owner's written consent.
- Sludge shall not be spread closer than 1,000 feet from a public water supply well or 250 feet from a private water supply well.
- Sludge shall not be land spread within 200 feet of any surface water unless a vegetative buffer strip is maintained between the surface watercourse and the land spreading system, in which case a minimum separation distance of at least 100 feet is required between the system and the surface watercourse.

- Depth to groundwater and bedrock shall be greater than 3 feet from the land surface elevation during use of any site.
- Sludge shall not be land spread in a floodway.
- Sludge shall not be land spread within 50 feet of a property line road or ditch unless the sludge is incorporated with the soil, in which case a minimum separation distance of at least 25 feet is required.
- The pH of the sludge-soil mixture shall be maintained at 6.5 or higher.
- Low areas of the approved fields, subject to seasonally high groundwater levels, are excluded from the sludge application.
- Crops for human consumption shall not be grown on the land for up to one year following the application of the sludge.
- The sludge shall be plowed, disked, injected or otherwise incorporated into the surface soil layer at appropriate intervals.

The flexibility implied in the latter provision for soil incorporation is intended to allow for crops which require more than a one year cycle. For the Point Beach disposal sites, alfalfa is a common crop which is harvested for several years after a single planting. Sludge disposal on an alfalfa plot constitutes good fertilization, but the plot cannot be plowed without destroying the crop. The alfalfa in this case aids in binding the layer of sludge on the surface of the plot. At a minimum, however, plowing (or disking or other method of injection and mixing to a nominal depth of 6 inches) shall be done prior to planting any new crop, regardless of the crop.

3.3 Administrative Procedures

Complete records of each disposal will be maintained. These records will include the concentration of radionuclides in the sludge, the total volume of sludge disposed, the total activity, the plot on which the sludge was applied, the results of the chemical composition determinations, and all dose calculations.

The annual disposal rate for each of the approved land spread sites will be limited to 4,000 gallons/acre, provided WDNR chemical composition, NRC dose guidelines, and concentration and activity limits are maintained within the appropriate values.

The farmer leasing the site used for the disposal will be notified of the applicable restrictions placed on the site due to the land spreading of sewage sludge.

4.0 Evaluation of Environmental Impact

4.1 Site Characteristics

4.1.1 Site Topography

The disposal sites are located in the Town of Two Creeks in the northeast corner of Manitowoc County, Wisconsin, on the west shore of Lake Michigan about 30 miles southeast of the center of the city of Green Bay, and 90 miles NNE of Milwaukee. This site is located at longitude 87° 32.5'W and latitude 44° 17.0'N. The six sites are on property owned and controlled by Wisconsin Electric and are within or directly adjacent to the Point Beach site boundary. The sites are described below and are outlined on the map contained in Appendix C as Figure 3.

Site No. PB-01 - The approximately 15 acres located in the NE 1/4 of the NE 1/4 of Section 23, T. 21N - R. 24E.

Site No. PB-02 - The approximately 20 acres located in the SE 1/4 of the SE 1/4 of Section 14, T. 21N - R. 24E.

Site No. PB-03 - The approximately 5 acres located in the NW 1/4 of Section 24, T. 21N - R. 24E.

Site No. PB-04 - The approximately 5 acres located in the NW 1/4 of the SW 1/4 of Section 24, T. 21N - R. 24E.

Site No. PB-05 - The approximately 5 acres located in the NE 1/4 of the NW 1/4 of Section 25, T. 21N - R. 24E.

Site No. PB-06 - The approximately 5 acres located in the NE 1/4 of the SW 1/4 of Section 14, T. 21N - R. 24E.

The overall ground surface at the site of the Point Beach Nuclear Plant is gently rolling to flat with elevations varying from 5 to 60 feet above the level of Lake Michigan. Subdued knob and kettle topography is visible from aerial photographs. The land surface slopes gradually toward the lake from the higher glacial moraine areas west of the site. Higher ground adjacent to the lake, however, diverts the drainage to the north and south.

The major surface drainage features are two small creeks which drain to the north and south. One creek discharges into the lake about 1500 feet above the northern corner of the site and the other near the center of the site. During the spring, ponds of water may occupy the shallow depressions. As mentioned in Section 3.2, Disposal Procedure, these low areas are excluded from the sludge application.

A site topographic map covering details out to a 5 mile radius may be found in the FSAR at Figure 2.2-3 and is included in Appendix C as Figure 2.

The disposal of sewage sludge at these six sites will have no impact on the topography of this area.

4.1.2 Site Geology

Prior to construction of the Point Beach Nuclear Plant, an evaluation of the geological characteristics of the area in and surrounding the site was made. The geologic structure of the region is essentially simple. Gently dipping sedimentary rock strata of Paleozoic age outcrop in a horseshoe pattern around a shield of Precambrian crystalline rock which occupies the western part of the region. The site is located on the western flank of the Michigan Basin, which is a broad downwarp ringed by discontinuous outcrops of more resistant formations. The bedrock formations are principally limestones, dolomites, and sandstones with subordinate shale layers. The rocks form a succession of extensive layers that are relatively uniform in thickness. The bedrock strata dip very gently towards Lake Michigan at rates from 15 to 35 feet per mile.

The uppermost bedrock under the site is Niagara Dolomite. Bedrock does not outcrop on the site but is covered by glacial till and lake deposits. The soils contain expansive clay minerals and have moderately high base exchange capacity.

In the area of the site, the overburden soils are approximately 70 to 100 feet in thickness. Although the character of the glacial deposits may vary greatly within relatively short distances, a generalized section through the overburden soils adjacent to Lake Michigan at the site consists of the following sequence:

1. An upper layer of brown clay silt topsoil underlain with several feet of brown silty clay with layers of silty sand;
2. A layer of 20 feet of reddish-brown silty clay with some sand and gravel and occasional lenses of silt;
3. A layer of 25 feet of reddish-brown silty clay with layers of silty sand and lenses of silt;
4. A layer of 50 feet of reddish-brown silty clay with some sand and gravel, the lower portion of which contains gravels, cobbles, and boulders resting on a glacial eroded surface of Niagara dolomite bedrock.

Site drainage is poor due to the high clay content of the soil combined with the pock-marked surface. Additional information on site geology may be found in Section 2.8 of the FSAR.

The use of these sites for disposal of sewage sludge will not impact the geology of the area.

4.2 Area Characteristics

4.2.1 Meteorology

The climate of the site region is influenced by the general storms which move eastward along the northern tier of the United States and by those which move northeastward from the southwestern part of the country to the Great Lakes. This continental type of climate is modified by Lake Michigan. During spring, summer, and fall months the lake temperature differs markedly from the air temperature. Wind shifts from westerly to easterly directions produce marked cooling of day-time temperatures in spring and summer. In autumn the relatively warm water to the lake prevents night-time temperatures from falling as low as they do a few miles inland from the shoreline. Summer time temperatures exceed 90°F for six days on the average. Freezing temperatures occur 147 days and below zero on 14 days of the winter on the average. Rainfall averages about 28 inches per year with 55 percent falling in the months of May through September. Snowfall averages about 45 inches per year. Sludge spreading shall be managed such that the surface spreading together with any precipitation falling on the field shall not overflow the perimeter of the field. Additional information on site meteorology may be found in Section 2.6 of the FSAR.

There will be no impact on the meteorology of the area due to the disposal of the sewage sludge.

4.2.2 Hydrology

The dominant hydrological feature of this site is Lake Michigan, one of the largest of the Great Lakes. The normal water level in Lake Michigan is approximately 580 feet above mean sea level. In the general vicinity of the site, the 30 foot depth contour is between 1 and 1-1/2 miles offshore and the 60 foot contour is 3 to 3-1/2 miles off shore. The disposal sites are twenty or more feet above the normal lake level. There is no record that the sites have been flooded by the lake during modern times. There are no rivers or large streams which could create a flood hazard at or near the sites.

The subsurface water table at the Point Beach site has a definite slope eastward toward the lake. The gradient indicated by test drilling on the site is approximately 30 feet per mile. It is therefore extremely unlikely that any release of radioactivity on the site could spread inland. Furthermore, the rate of subsurface flow is small due to the relative impervious nature of the scil and will not promote the spread of releases. Further information on site hydrology is detailed in the PBNP FSAR Section 2.5.

There will be no adverse impact on hydrology of the area due to disposal of sewage sludge by land spreading.

4.3 Water Usage

4.3.1 Surface Water

Lake Michigan is used as the source of potable water supplies in the vicinity of the site for the cities of Two Rivers (12 miles south), Manitowoc (16 miles sourth), Sheboygan (40 miles south), and Green Bay (intake at Rostok 1 mile north of Kewaunee, 13 miles north). No other potable water uses are recorded within 50 miles of the site along the lake shore. All public water supplies drawn from Lake Michigan are treated in purification plants. The nearest surface water used for drinking other than Lake Michigan are the Fox River 30 miles NW and

Lake Winnebago 40 miles W of the site.

Lake Michigan is also utilized by various recreational activities, including fishing, swimming and boating.

There will be no impact on surface water usage due to the disposal of sewage sludge.

4.3.2 Ground Water

Ground water provides the remaining population with potable supplies. Public ground water supplies within a 20 mile radius of the site are listed in Table 2.5-3 of the FSAR. Additional wells for private use are in existence throughout the region. The location of private wells within a two mile radius of PBNP are indicated on Figure 3, Appendix C.

The potable water for use at the Point Beach Nuclear Plant is drawn from a 257 feet deep well located at the southwest corner of the plant yard. Water from this well is routinely sampled as part of the environmental monitoring program.

There will be no adverse impact on ground water usage due to the disposal of sewage sludge.

4.4 Land Usage

Manitowoc County, in which the site is located, and the adjacent counties of Kewaunee, Brown, Calumet, and Sheboygan are predominantly rural. Agricultural pursuits account for approximately 90% of the total county acreage. With the exception of the Kewaunee Nuclear Plant located 4.5 miles north, the region within a radius of five miles of the site is presently devoted exclusively to agriculture. Dairy products and livestock account for 85% of the counties' farm production, with field crops and vegetables accounting for most of the remainder. The principal crops are grain corn, silage corn, oats, barley, hay, potatoes, green peas, lima beans, snap beans, beets, cabbage, sweet corn, cucumbers, and cranberries. Within the township of Two Creeks surrounding the site (15 sq. miles), there are about 800 producing cows on about 40 dairy farms. Some beef cattle are raised 2.5 miles north of the site. Cows are on pasture from the first of June to late September or early October. During the winter, cows are fed on locally produced hay and silage. Of the milk produced in this area, about 25 percent is consumed as fluid milk and 50 percent is converted to cheese, with the remainder being used in butter making and other by-products.

It has been the policy of Wisconsin Electric to permit the controlled use of crop land and pasture land on company owned property. No direct grazing of dairy or beef cattle or other animals is permitted on these company owned properties. Crops intended for human consumption shall not be grown on the disposal sites for at least one year following the application of the sludge.

The proposed land application of sewage sludge will not have any direct effect on the adjacent facilities. Additional land use information may be found in Section ?.4 of the FSAR.

4.5 Radiological Impact

The rate of sewage sludge application on each of the six proposed sites will be monitored to insure doses are maintained within applicable limits. These limits are based on NRC Nuclear Reactor Regulation (NRR) staff proposed guidance (described in AIF/NESP-037, August, 1986). These limits require doses to the maximally exposed member of the general public to be maintained less than 1 mrem/year due to the disposal material. In addition, NRR guidance requires doses of less than 5 mrem/year to an inadvertent intruder.

To assess the doses received by the maximally exposed individual and the inadvertent intruder, six credible pathways have been identified for the maximally exposed individual and four credible pathways for the inadvertent intruder. The identified credible pathways are described in Appendix D.

Calculations detailed in Appendix E demonstrate the disposal of the currently stored PBNP sewage sludge would remain below these limits. The total annual exposure to the maximally exposed individual based on the identified exposure pathways is equal to 0.072 mrem. The dose to a hypothetical intruder assuming an overly conservative occupancy factor of 100% is calculated to be 0.115 mrem/year. By definition, the inadvertent intruder would not be exposed to the processed food pathways (meat and milk).

The calculational methodology used in determining doses for the proposed disposal of sludge stored at PBNP shall be utilized prior to each additional land application to insure doses are maintained less than those proposed by NRR. This calculation will include radionuclides disposed of in previous sludge applications. The activity from these prior disposals will be corrected for radiological decay prior to performing dose calculations for the meat, milk, and vegetable ingestion pathways, the inhalation of resuspended radionuclides, and all pathways associated with a potential release to Lake Michigan. The residual radioactivity will be corrected for radiological decay and, if applicable, the mixing of radionuclides in the soil prior to performing external exposure calculations. In addition, the dose to a farmer potentially leasing more than one application site will be addressed by summing the doses received from the external exposure from a ground plane source and resuspension inhalation pathways for each leased site. In addition, the maximum site specific dose due to the other pathways identified in Appendix D, will be utilized in the total exposure estimation.

5.0 Radiation Protection

The disposal operation will follow the applicable PBNP procedures to maintain doses as low as reasonably achievable. Technical review and guidance will be provided by the PBNP Superintendent - Health Physics.

APPENDIX A

SUMMARY OF RADIOLOGICAL ANALYSES OF SEWAGE SLUDGE SINCE DECEMBER 30, 1983

Sample Date	Tank	Tank Volume (Gallons)	Radionuclide	Concentration (μCi/cc)
12-30-83	Digester	8400	Co-58	5.58E-07
			Co-60	1.87E-06
			Cr-51	4.88E-07
			Cs-134	1.59E-07
			Cs-137	3.57E-07
4-06-84	Digester	7560	Co-60	7.89E-07
	Aeration	6667	Co-60	1.87E-07
12-05-84	Digester	7560	Co-58	1.75E-07
	Aeration	6667	Co-60	8.29E-07
6-03-85	Digester	7560	Co-60	8.29E-07
			Cs-137	2.46E-07
	Aeration	6700	Co-60	3.27E-07
			Cs-137	1.33E-07
4-10-86	Digester	7560	Co-60	6.79E-07
			Cs-137	1.72E-07
			Mn-54	4.91E-08
			Co-60	1.65E-07
11-04-86	Digester	7560	Co-58	8.04E-08
	Aeration & Clarifier	25100	Co-58	1.37E-07
			Co-60	2.18E-07
			Cs-137	1.64E-07

APPENDIX B

CHEMICAL COMPOSITION ANALYSIS OF SEWAGE SLUDGE

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

SLUDGE CHARACTERISTIC
Wisconsin Statute 147.02(1) and
Wisconsin Administrative Code NR 110.27(6)
FORM 3400-49 REV. 10-80

ewage Treatment Plant Sludge

. lease complete this form and send to the Department of Natural Resources appropriate District/Area Office. Keep one copy for your records.
For additional forms, please contact your appropriate District/Area Office.

PERMITTEE Wisconsin Electric Power Company	WPDES PERMIT NUMBER WI 00 0 0 9 5 7
STREET OR ROUTE 231 W. Michigan Street	COUNTY Milwaukee
CITY, STATE, ZIP CODE Milwaukee, WI 53203	TELEPHONE NUMBER (INCLUDE AREA CODE) 414-277-2153

1. Please report laboratory testing results for the following parameters:

*Parameter	Abbreviation	Result	*Parameter	Abbreviation	Result
Total Solids, %	–	1.6[illegible]	Chromium, ppm	Cr	[illegible]
Total Nitrogen, %	TOT N	1.0	Copper, ppm	Cu	2200
Ammonium Nitrogen, %	NH_4^+–N	0.34	Lead, ppm	Pb	190
Total Phosphorous, %	P	< 0.01	Mercury, ppm	Hg	3.6
Total Potassium, %	K	0.25	Nickel, ppm	Ni	12
Arsenic, ppm	As	1.0	Zinc, ppm	Zn	2800
Cadmium, ppm	Cd	12.	pH	–	7.0

*Suggested analysis procedures for the above parameters can be found in NR 219, analytical tests and procedures, Wisconsin Administrative Code. All parameters other than percent solids and pH shall be reported on a dry weight basis.

2. What is the name of the laboratory that did the analysis and when was it performed?

Laboratory Name Wisconsin Electric Power Co. Laboratory Services Division Date sent to lab April 12, 1983

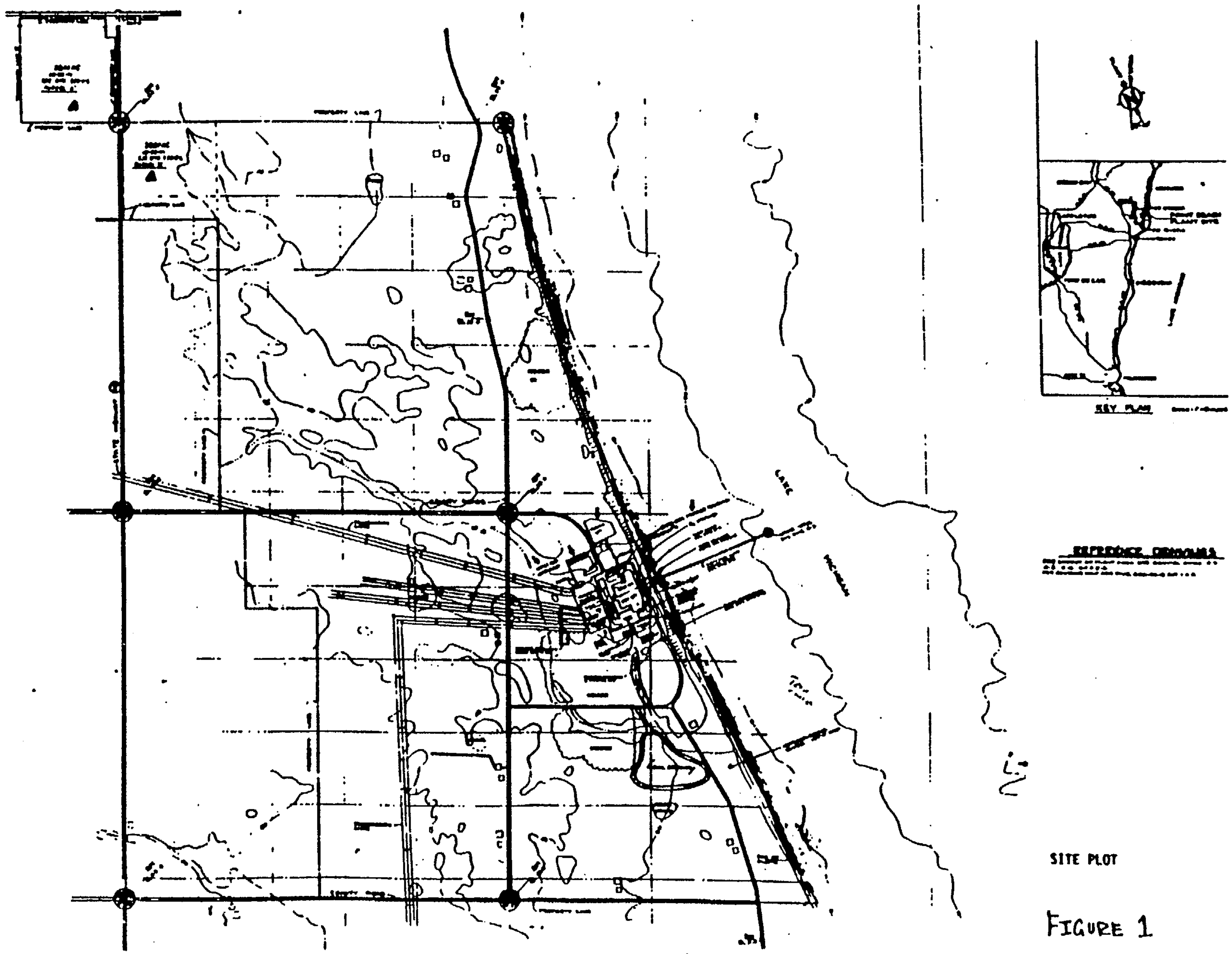
Where at the treatment plant was the sample taken? From sludge holding tank prior to hauling

When was the sample taken? April 12, 1983

SIGNATURE	TITLE	DATE
[illegible]	Water Quality Engineer	

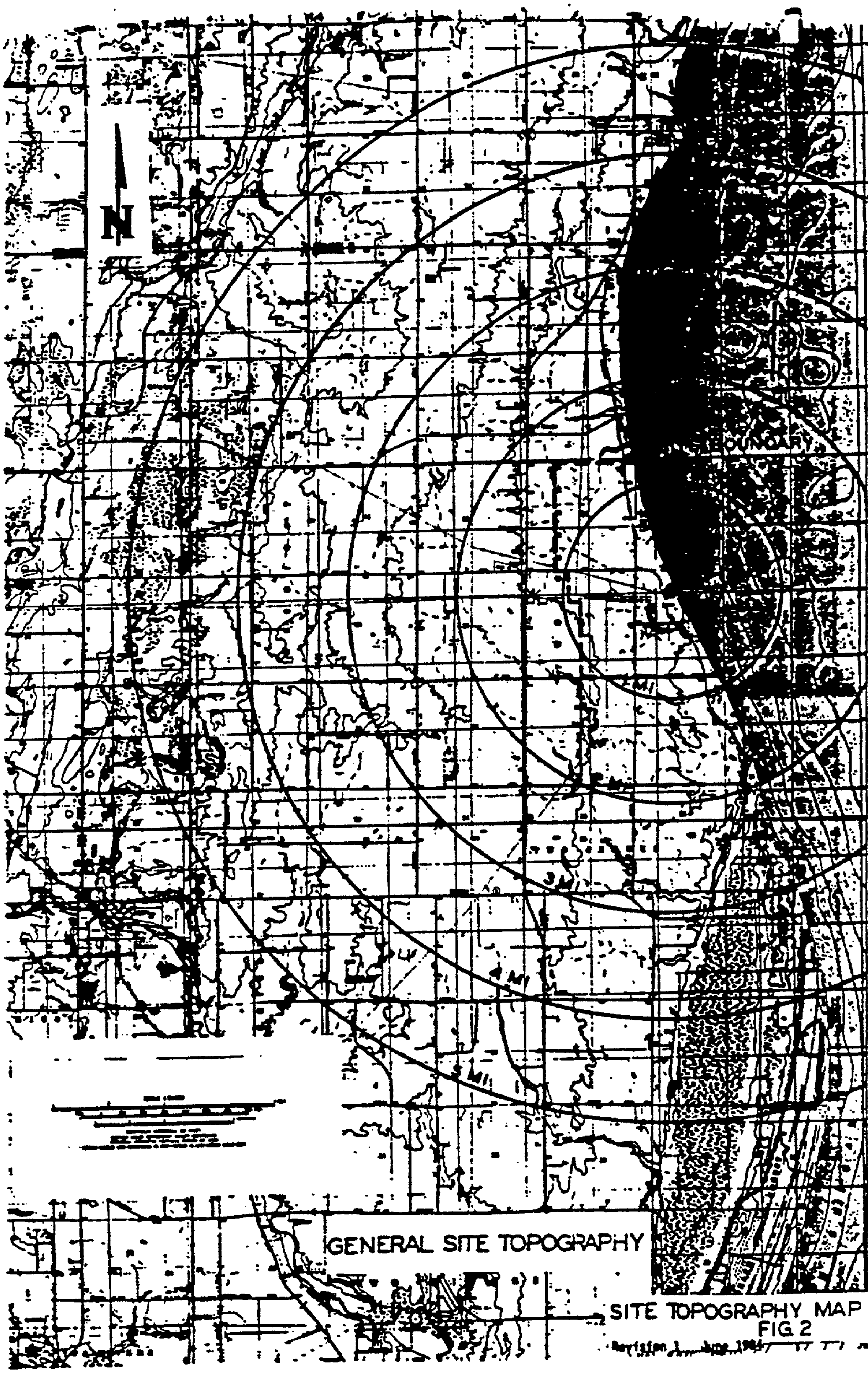
APPENDIX C

SITE MAPS



SITE PLOT

FIGURE 1



SITE TOPOGRAPHY MAP
FIG 2

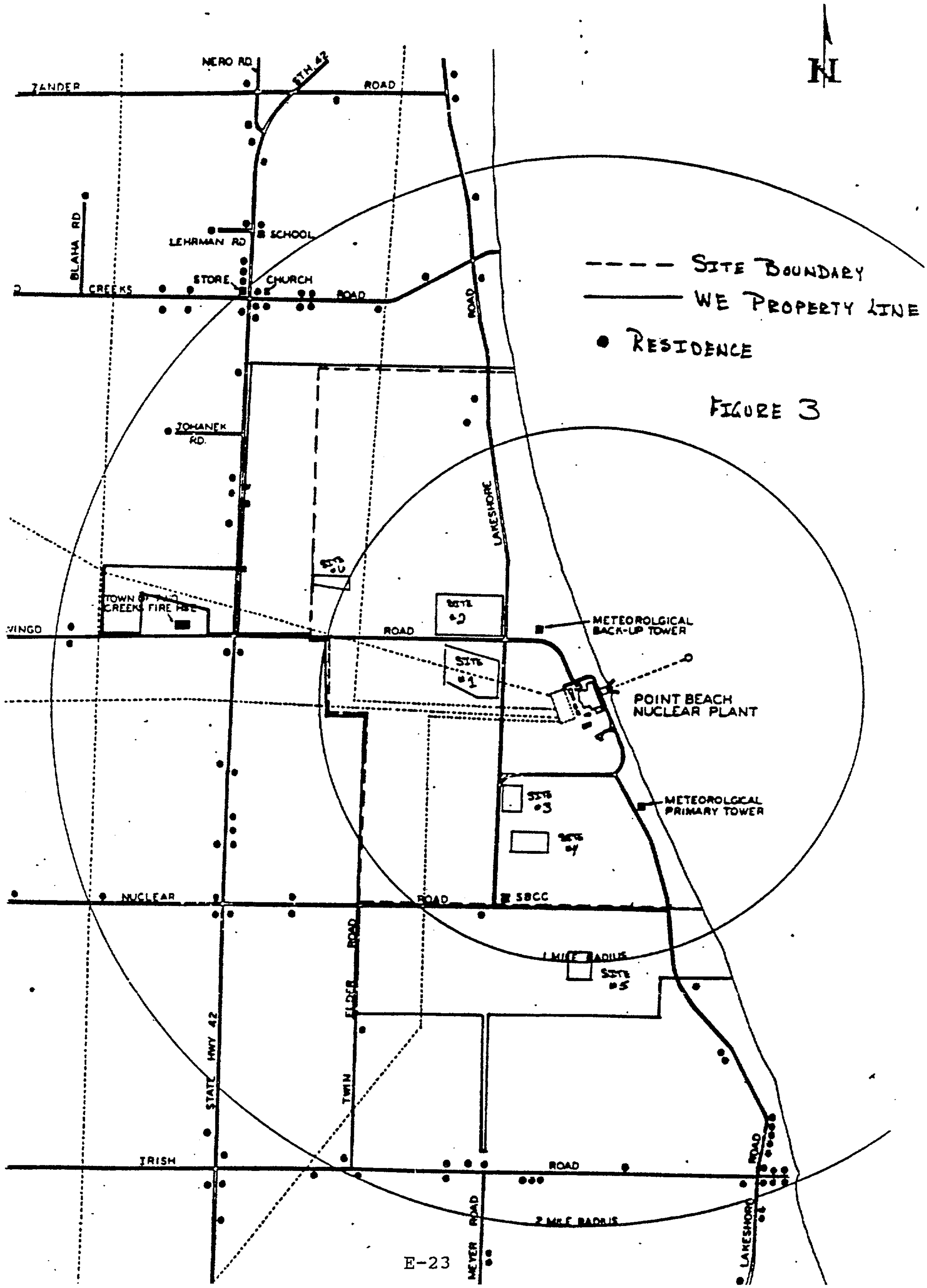

N
ZANDER ROAD
NERO RD.
STH 42
BLAHA RD
LEHMAN RD
SCHOOL
STORE
CHURCH
CREEKS ROAD
JOHANEK RD.
TOWN OF TWO CREEKS FIRE HSE
VINGO ROAD
LAKESHORE ROAD
SITE #1
SITE #2
SITE #3
SITE #4
SITE #5
SITE #6
METEOROLGICAL BACK-UP TOWER
POINT BEACH NUCLEAR PLANT
METEOROLGICAL PRIMARY TOWER
NUCLEAR ROAD
SBCC
1 MILE RADIUS
2 MILE RADIUS
STATE HWY 42
TWIN ELDER ROAD
IRISH ROAD
MEYER ROAD
LAKESHORE ROAD
---- SITE BOUNDARY
—— WE PROPERTY LINE
● RESIDENCE

FIGURE 3

APPENDIX D

EXPOSURE PATHWAYS

I. EXPOSURE PATHWAYS - MAXIMALLY EXPOSED INDIVIDUAL

1. External whole body exposure due to a ground plane source of radionuclides.

2. Milk ingestion pathway from cows fed alfalfa grown on plot.

3. Meat ingestion pathway from cows fed alfalfa grown on plot.

4. Vegetable ingestion pathway from vegetables grown on plot.

5. Inhalation of radioactivity resuspended in air above application site.

6. Pathways associated with a release to Lake Michigan. Ingestion of potable water at Two Rivers, Wisconsin municipal water supply, ingestion of fish from edge of initial mixing zone of radionuclide release, ingestion of fresh and stored vegetables irrigated with water source as Lake Michigan, ingestion of milk and meat from cows utilizing Lake Michigan as drinking water source, swimming and boating activities at edge of initial mixing zone, and shoreline deposits.

II. EXPOSURE PATHWAYS - INADVERTENT INTRUDER

1. External whole body exposure due to a ground plane source of radionuclides.

2. Vegetable ingestion pathway from vegetables grown on plot.

3. Inhalation of radioactivity resuspended in air above application site.

4. Pathways associated with a release to Lake Michigan. Ingestion of potable water at Two Rivers, Wisconsin municipal water supply, ingestion of fish from edge of initial mixing zone of radionuclide release, ingestion of fresh and stored vegetables irrigated with water source as Lake Michigan, ingestion of milk and meat from cows utilizing Lake Michigan as drinking water source, swimming and boating activities at edge of initial mixing zone, and shoreline deposits.

The milk and meat pathways are not included in calculating the dose to the inadvertent intruder. The doses due to these pathways are calculated based on feeding the cows alfalfa grown on the sludge applied land. Since direct grazing on these lands is prohibited, the alfalfa must be cropped prior to being used as feed. This effectively removes the availability of these pathways to the inadvertent intruder, who by definition occupies the sludge applied land continuously.

III. GROUND WATER PATHWAY

The ingestion of groundwater is not a credible exposure pathway. The two factors contributing to this determination are as follows:

1. The site map in Appendix C, Figure 3 details the spatial relationship between the proposed disposal sites and the local ground water wells. The flow gradient of ground water was determined for the PBNP FSAR to be towards Lake Michigan. Reviewing the sites and local wells shows no private well located in the path of radionuclide migration towards Lake Michigan.

   The PBNP site well is located on the plant site, potentially in a path of radionuclide migration. The PBNP well is routinely sampled as a requirement of the PBNP environmental monitoring program.

2. The cation exchange capacity (CEC) of the soils at each site has been determined.

Site	Cation Exchange Capacity (MEQ/100g)
1	16
2	11
3	11
4	10
5	8
6	9

   The cation exchange capacity of soil is dependent on the valance of the radionuclides and is determined by the relation:

$$MEQ = \frac{\text{ATOMIC WEIGHT}}{\text{VALANCE}} * 1.0E\text{-}03$$

Radionuclide	Valance	CEC (MEQ/100g)
Co-60	+2	3.00E-02
Co-58	+2	2.90E-02
Cs-137	+1	1.37E-01
Mn-54	+2	2.70E-02
Cr-51	+3	1.70E-02
Cs-134	+1	1.34E-01

   Using the values for Cs-137 and site 5 which has the lowest CEC, the total exchange capacity of the soil is

$$\frac{\text{1.10 grams of Cs-137}}{\text{100 grams of soil}}$$

   Calculating the specific activity of Cs-137,

$$\text{Specific Activity} = \frac{3.578E+05}{T_{1/2}(\text{yrs.}) \cdot \text{ATOMIC MASS}} = \frac{3.578E+05}{30 \cdot 137}$$

$$= 87.1 \text{ Ci/gram}$$

The cation exchange capacity of the soil expressed in the number of Curies of radionuclide per 100 grams of soil is

$$\frac{95.8 \text{ Ci Cs-137}}{100 \text{ grams of soil}}$$

Since the proposed disposal of sewage sludge contains quantities of radionuclides on the order of 10-100 μCi the soil at each site has the capacity to effectively eliminate the migration of the radionuclide to ground water.

APPENDIX E

EXPOSURE ANALYSIS

GENERAL ASSUMPTIONS

1. Sewage sludge is uniformly applied over plot acreage.

2. Sewage sludge is applied to one of the 5 acre plots, site PB-03, PB-04, PB-05, or PB-06. (Assuming the smallest site size is conservative for the calculation methodology herein.)

3. Based on the sewage sludge currently stored at PBNP, the following data is used in the calculations.

Radionuclide	Sludge Volume (Gallons)	Sludge Volume (cm^3)	Activity (μCi)	Concentration ($\mu Ci/cm^3$)	Ground Plane Concentration ($\mu Ci/cm^2$)
Co-60	15,000	5.68E+07	13.2	2.33E-07	6.53E-08
Cs-137	15,000	5.68E+07	8.5	1.50E-07	4.21E-08

I. CALCULATION OF EXTERNAL EXPOSURES

A. Specific Assumptions

1. Conservatively assume radioactivity remains on surface of land plot. Calculation ignores any plowing or mixing of radioactivity within soil. Calculations for the proposed disposal will therefore ignore self absorption or shielding from soil.

   The external exposure at the application site due to prior disposals will be calculated utilizing the methodology in Appendix G and added to that calculated for the proposed disposal.

2. The plots are owned by Wisconsin Electric and have been approved by the Wisconsin Department of Natural Resources (DNR) as disposal sites. The land is leased and potentially farmed. Occupancy of the land can be realistically expected only during plowing, planting and harvesting. Occupancy has been estimated to be 64 hours per year.

B. Summary of Calculational Methodology

1. Calculate ground plane radionuclide concentrations in pCi/cm^2.

2. The dose from a plane of uniformly deposited radionuclides is calculated using Regulatory Guide 1.109, Revision 1, Appendix C, Formula C-2.

3. Dose rates were calculated assuming continuous occupancy then adjusted for realistic occupancy factors.

C. External Exposure Rate Calculations

The dose from a plane of uniformly deposited radionuclides is calculated using Regulatory Guide 1.109, Revision 1, Appendix C, formula C-2

$$D_j^G(r,\theta) = 8760\ S_F \sum_i C_i^G(r,\theta)\ DFG_{ij}$$

where

$D_j^G(r,\theta)$ = yearly dose

8760 = hours per year

S_F = 1.0, since no dose reduction due to residential shielding is applicable.

$C_i^G(r,\theta)$ = ground plane radionuclide concentration (pCi/m²)

DFG(i,j) = external dose factor for standing on contaminated ground as given in Table E-6 of Regulatory Guide 1.109, Revision 1.

Radionuclide	γ Dose Factor (mrem/hr per pCi/m²)	Ground Plane Concentration (μCi/cm²)	Ground Plane Concentration (pCi/m²)	γ Dose Rate (mrem/yr)
Co-60	1.70E-08	6.53E-08	6.53E+02	9.72E-02
Cs-137	4.20E-09	4.21E-08	4.21E+02	1.55E-02

TOTAL: 1.13E-01 mrem/year

These calculated dose rates assume continuous occupancy. In reality, these sites will be occupied only during plowing, planting, and harvesting. Assuming an occupancy of 2 hours per day, 1 day per week, and 32 weeks (8 month growing season) per year, the occupancy factor becomes

2 hr/day * 1 day/week * 32 weeks/yr * 1/8760 hours/yr = 7.3E-03.

EXTERNAL EXPOSURE DOSE RATE (mrem/year)

Radionuclide	Continuous Occupancy	Realistic Occupancy
Co-60	9.72E-02	7.10E-04
Cs-137	1.55E-02	1.13E-04
TOTAL:	1.13E-01	8.23E-04

II. CALCULATION OF MEAT AND MILK INGESTION PATHWAY EXPOSURES

A. Specific Assumptions

1. All feed consumed by cow is grown on sludge applied acreage.

2. All meat and milk consumed by human is from cattle exclusively fed feed from sludge applied land.

3. Stable element transfer coefficients (B_{iv}) are utilized from Regulatory Guide 1.109 to estimate the fraction of radioactivity which is transferred from the soil to the feed.

Radionuclide	B_{iv}
Co-60	9.4E-03
Cs-137	1.0E-02

4. Alfalfa has typically been grown on the plots. Soil tests have indicated a minimum alfalfa yield of 4.1 tons per acre can be expected.

B. Summary of Calculational Methodology

1. The concentration of radionuclides in feed grown on the disposal plots is estimated. Transfer coefficients (B_{iv}) from Table E-1 of Regulatory Guide 1.109 were used to estimate the fraction of radionuclide which may be expected to transfer to the feed from the soil.

2. Concentrations of radionuclides in milk and meat were estimated using Formula A-11 from Regulatory Guide 1.109.

3. Ingestion dose rates were estimated using Formula A-12 from Regulatory Guide 1.109.

C. Milk and Meat Ingestion Pathway Dose Rate Calculation

1. Concentration in feed.

Activity in Feed = B_{iv} * Activity in Soil

Concentration in Feed = Activity in Feed/($\frac{\text{kg of Feed}}{\text{Acre}}$ * 5 Acres)

Radionuclide	Activity in Soil (μCi)	Activity in Feed (μCi)	Radionuclide Concentration in Feed (pCi/kg)
Co-60	13.2	1.24E-01	6.67E+00
Cs-137	8.5	8.50E-02	4.57E+00

2. Concentration in Milk and Meat

Calculate concentrations of radionuclides in milk and meat using

Formula A-11 in Regulatory Guide 1.109, Revision 1 which is

$$C_{iA} = F_{iA} * C_{iF} * Q_F$$

where C_{iA} = radionuclide concentration of i in component A
F_{iA} = stable element transfer coefficient whose values are in Table E-1 of the Regulatory Guide
C_{iF} = radionuclide concentration in feed
Q_F = consumption rate of feed = 50 kg/d (wet weight) from Regulatory Guide 1.109

Use the following Regulatory Guide 1.109 values for F_{iA}

Element	$F_{iA}=_m$ (d/l) for milk	$F_{iA}=F_f$ (d/kg) for meat
Co	1.0E-03	1.3E-02
Cs	1.2E-02	4.0E-03

Radionuclide	Concentration in Milk (pCi/l)	Concentration in Meat (pCi/kg)
Co-60	3.34E-01	4.34E+00
Cs-137	2.74E+00	9.14E-01

3. Calculated Dose rates

The formula for total dose from eating animal products fed vegetation (alfalfa) grown on PBNP sludge applied land is given by Regulatory Guide 1.109, Revision 1, Formula A-12, page 1.109-16. But, as noted following equation A-13, it is necessary to compute separately the milk and meat portions of the dose.

$$DOSE = \Sigma(U_{ap} * D_{iapg} * exp(-\lambda_i t_s))$$

where U_{ap} = consumption rate of animal product
C_{iA} = conc of radionuclide i in animal product A
D_{iapg} = dose factor
t_s = average time between milking or slaughtering and consumption

	U_{ap} by Age Group			
	Infant	Child	Teenager	Adult
Milk (l/yr)	330	330	400	310
Meat (kg/yr)	-	41	65	110

C_{iA} = concentration calculated above

D_{iapg} = DF whole body dose factors, Regulatory Guide 1.109, Revision 1.

Whole Body Dose Factors (mrem/pCi Ingested)

Nuclide	Infant Ingestion	Child Ingestion	Teenager Ingestion	Adult Ingestion
Co-60	2.55E-05	1.56E-05	6.33E-06	4.72E-06
Cs-137	4.33E-05	4.62E-05	5.19E-05	7.14E-05

T_s = 0 for milk (assume consumption on farm)
= 20 days for meat (Regulatory Guide 1.109, Revision 1, Table E-15)

MILK INGESTION DOSE RATE (mrem/year)

Radionuclide	Infant	Child	Teenager	Adult
Co-60	2.81E-03	1.72E-03	8.46E-04	4.89E-04
Cs-137	3.92E-02	4.18E-02	5.69E-02	6.06E-02
TOTALS:	4.20E-02	4.35E-02	5.77E-02	6.11E-02

MEAT INGESTION DOSE RATE (mrem/year)

Radionuclide	Infant	Child	Teenager	Adult
Co-60	-	2.76E-03	1.77E-03	2.24E-03
Cs-137	-	1.73E-03	3.08E-03	7.18E-03
TOTALS:	-	4.49E-03	4.85E-03	9.42E-03

MEAT AND MILK INGESTION PATHWAY DOSE RATES (mrem/year)

Infant - 4.20E-02
Child - 4.80E-02
Teenager - 6.26E-02
Adult - 7.05E-02

III. CALCULATION OF VEGETABLE INGESTION PATHWAY EXPOSURES

A. Specific Assumptions

1. The WPDES permit issued to PBNP for the disposal of sewage sludge prohibits the growing of crops for human consumption for one year following the application of the sewage sludge. Therefore, prior to planting vegetables on the application site, the soil would be plowed. Plowing is assumed to uniformly mix the top 6 inches of soil.

2. The soil density is assumed to be 1.3 grams/cm^3.

3. All vegetables consumed by the individual of interest are grown on the sludge applied acreage.

4. Stable element transfer coefficients (B_{iv}) from Regulatory Guide 1.109 are used to estimate the fraction of radioactivity transfered from the soil to the vegetables.

Radionuclide	B_{iv}
Co-60	9.4E-03
Cs-137	1.0E-02

5. The consumption factors of food medium (U_{ap}) and the mass basis distributions from Regulatory Guide 1.109, Table E-5 are used to determine annual consumption of vegetables.

U_{ap} by Age Group*

Infant	Child	Teen	Adult
-	280 kg/yr	340 kg/yr	280 kg/yr

*Based on 54% vegetable consumption by mass of fruit, vegetable, and grain.

6. The Ingestion Dose Factors by age group are from Regulatory Guide 1.109, Tables E-11, E-12, E-13, and E-14.

Whole Body Ingestion Dose Factors (mrem/pCi ingested)

Radionuclide	Infant	Child	Teen	Adult
Co-60	2.55E-05	1.56E-05	6.33E-06	4.72E-06
Cs-137	4.33E-05	4.62E-05	5.19E-05	7.14E-05

7. Radiological decay of the radionuclides applied to the plot is not taken into account in these calculations.

B. Summary of Calculational Methodology

1. The radionuclide concentration in the soil is calculated in units of pCi/kg based on uniform application over 5 acre plot, plowing to a depth of 6 inches, and a soil density of 1.3 g/cm^3.

2. The B_{iv} values are applied to the soil concentration values to obtain the radionuclide concentration in the vegetables.

3. The consumption factors (U_{ap}) for each age group are then used to determine the annual radionuclide intake by age group due to eating these vegetables.

4. Finally, the age dependent ingestion dose factors are used to obtain annual doses by age group.

C. Vegetable Pathway Ingestion Dose Rate Calculations

1. Concentration in soil

Radionuclide	Activity Applied (μCi)	Soil Volume (cm^3)	Soil Mass (kg)	Concentration In Soil (pCi/kg)
Co-60	13.2	3.08E+09	4.00E+06	3.30E+00
Cs-137	8.5	3.08E+09	4.00E+06	2.13E+00

2. Concentration in vegetables

Radionuclide	Concentration In Soil (pCi/kg)	B_{iv}	Concentration In Vegetables (pCi/kg)
Co-60	3.30E+00	9.4E-03	3.10E-02
Cs-137	2.13E+00	1.0E-02	2.13E-02

3. Calculated Dose Rates

The dose rate for direct ingestion of vegetables grown on the sludge applied land is given by the equation.

$$\text{DOSE RATE} = \Sigma\, U_{ap} * D_{iapj} * \text{EXP}\,(-\lambda_i t) * C_i$$

where

U_{ap} = consumption rate of food medium
D_{iapj} = dose factor for radionuclide, i
λ_i = radiological decay constant
t = time between harvest and consumption
C_i = concentration of radionuclide, i, in food medium.

t, the time between harvest and ingestion, is assumed to be zero for this calculation.

VEGETABLE INGESTION DOSE RATE (mrem/year)

Radionuclide	Infant	Child	Teen	Adult
Co-60	-	1.35E-04	6.67E-05	4.10E-05
Cs-137	-	2.75E-04	3.76E-04	4.26E-04
TOTAL	-	4.11E-04	4.43E-04	4.67E-04

IV. CALCULATION OF INHALATION OF RESUSPENDED RADIONUCLIDES PATHWAY EXPOSURE

A. Specific Assumptions

1. The model used to determine the radionuclide concentration in air above the sludge applied land is taken from WASH-1400, USNRC, Reactor Safety Study - An Assessment of Accident Risks in Commercial Nuclear Power Plants, Appendix VI.

2. The radionuclide concentration in air remains constant for year of interest, i.e., radiological decay and decrease in resuspension factor are not taken into account for this calculation.

3. The maximally exposed member of the general public is assumed to be the farmer using the plot of land with an occupancy of 64 hours per year.

4. The inadvertent intruder is assumed to occupy the plot of land for the entire year.

5. The Inhalation Dose Factors by age group are from Regulatory Guide 1.109, Tables E-7, E-8, E-9, and E-10.

WHOLE BODY INHALATION DOSE FACTORS (mrem/pCi inhaled)

Radionuclide	Infant	Child	Teen	Adult
Co-60	8.41E-06	6.12E-06	2.48E-06	1.85E-06
Cs-137	3.25E-05	3.47E-05	3.89E-05	5.35E-05

LUNG INHALATION DOSE FACTORS (mrem/pCi inhaled)

Radionuclide	Infant	Child	Teen	Adult
Co-60	3.22E-03	1.91E-03	1.09E-03	7.46E-04
Cs-137	5.09E-05	2.81E-05	1.51E-05	9.40E-06

6. The age dependent inhalation rates are obtained from Regulatory Guide 1.109, Table E-5.

Inhalation Rates (m^3/yr)

Infant	Child	Teen	Adult
1400	3700	8000	8000

B. Summary of Calculational Methodology

1. The ground plane radionuclide concentrations in pCi/m².

2. Calculate the resuspension factor utilizing equation given in WASH-1400.

3. Obtain the radionuclide concentration in air (pCi/m³) above plot utilizing methodology in WASH-1400.

4. Using parameters contained in Regulatory Guide 1.109, calculate annual dose for continuous occupancy and for realistic occupancy.

C. Inhalation of Resuspended Radionuclides in Air Pathway Dose Rate Calculations - Resuspension of Radionuclide in Air

1. Ground plane radionuclide concentration

Radionuclide	Ground Plane Concentration (µCi/cm²)	Ground Plane Concentration (pCi/m²)
Co-60	6.53E-08	6.53E+02
Cs-137	4.21E-08	4.21E+02

2. Calculation of resuspension factor, K (m^{-1})

From WASH-1400,
K(t) = 1.0E-09 + 1.0E-05 * EXP [-0.6769 * t]

where t = time since radionuclides were deposited on ground surface.

t is assumed to be 0 for these calculations, thereby maximizing the resuspension factor.

Therefore,

$$K = 1.0E\text{-}05\ m^{-1}$$

3. Calculate radionuclide concentration (pCi/m³) in air.

From WASH-1400,

$$K(m^{-1}) = \frac{\text{air concentration (pCi/m}^2)}{\text{surface deposit (pCi/m}^2)}$$

or

Air Concentration (pCi/m³) = surface deposit (pCi/m²) * K(m^{-1})

AIR CONCENTRATIONS

Radionuclide	Air Concentrations (pCi/m³)
Co-60	6.53E-03
Cs-137	4.21E-03

4. Dose Rate Calculations

Dose Rate (mrem/yr) = Inhalation Rate (m^3/yr) * Air Conc. (pCi/m^3) * Dose Conversion Factor (mrem/pCi)

WHOLE BODY INHALATION DOSE RATE (mrem/year)

Radionuclide	Infant	Child	Teen	Adult
Co-60	7.69E-05	1.48E-04	1.30E-04	9.66E-05
Cs-137	1.92E-04	5.41E-04	1.31E-03	1.80E-03
TOTAL	2.69E-04	6.89E-04	1.44E-03	1.90E-03

LUNG INHALATION DOSE RATE (mrem/year)

Radionuclide	Infant	Child	Teen	Adult
Co-60	2.94E-02	4.61E-02	5.69E-02	3.90E-02
Cs-137	3.00E-04	4.38E-04	5.09E-04	3.17E-04
TOTAL	2.97E-02	4.65E-02	5.74E-02	3.93E-02

INHALATION OF RESUSPENDED RADIONUCLIDES IN AIR DOSE RATES

WHOLE BODY DOSE RATE (mrem/year)

Occupancy	Infant	Child	Teen	Adult
Continuous	2.69E-04	6.89E-04	1.44E-03	1.90E-03
Realistic	1.96E-06	5.03E-06	1.05E-05	1.39E-05

LUNG DOSE RATE (mrem/year)

Occupancy	Infant	Child	Teen	Adult
Continuous	2.97E-02	4.65E-02	5.74E-02	3.93E-02
Realistic	2.17E-04	3.39E-04	4.19E-04	2.87E-04

V. CALCULATION OF WHOLE BODY EXPOSURES DUE TO RELEASE TO LAKE MICHIGAN

A. Specific Assumptions

1. The methodology contained in the PBNP Offsite Dose Calculation Manual (ODCM) is used to perform this calculation.

2. The entire activity contained in the sludge is released into Lake Michigan.

3. The exposure pathways addressed by the ODCM methodology are ingestion of potable water from Two Rivers, WI water supply, ingestion of fish at edge of initial mixing zone, ingestion of fresh and stored vegetables, irrigated with Lake Michigan as source of water, ingestion of milk and meat from cows utilizing Lake Michigan as drinking water source, swimming and boating activities at edge of initial mixing zone, and shoreline deposits.

B. Summary of Calculational Methodology

1. The activity released in the sludge is converted into Co-60 dose equivalent Curies.

2. The annual design release limit from the ODCM is 94.7 Co-60 equivalent curies.

3. The annual design release limit is based on a limiting dose of 6 mrem adult whole body. The annual dose due to sewage sludge is calculated by a ratio of calculated release compared to release limit.

C. Whole Body Exposure Calculations

1. Co-60 equivalent Curies

Radionuclide	Activity (μCi)	DF_i/DF_{Co-60}	Co-60 eq. Activity (μCi)
Co-60	13.2	1.00E+00	13.2
Cs-137	8.5	1.51E+01	128.4
		TOTAL	141.6μCi Co-60 equivalent

2. Ratio of dose limit to annual design release limit

$$\frac{6 \text{ mrem}}{94.7 \text{ Co-60 equivalent curies}}$$

3. Whole Body Dose Calculation

$$\frac{\text{Dose}}{141.6\mu\text{Ci}} = \frac{6 \text{ mrem}}{94.7\times10^{6}\mu\text{Ci}}$$

Dose = 8.97E-06 mrem

WHOLE BODY DOSE RATE (mrem/year)

DOSE SUMMARY

Maximally Exposed Individual

The identified credible exposure pathways for the maximally exposed individual are:

1.) External exposure from ground plane source (realistic occupancy)
2.) Milk ingestion pathway
3.) Meat ingestion pathway
4.) Vegetable ingestion pathway
5.) Resuspension inhalation pathway (realistic occupancy)
6.) Pathways identified due to release to Lake Michigan.

	AGE GROUP			
Pathway	Infant	Child	Teen	Adult
External	8.23E-04	8.23E-04	8.23E-04	8.23E-04
Milk	4.20E-02	4.35E-02	5.77E-02	6.11E-02
Meat	-	4.49E-03	4.85E-03	9.42E-03
Vegetable	-	4.11E-04	4.43E-04	4.67E-04
Inhalation	1.96E-06	5.03E-06	1.05E-05	1.39E-05
Water	8.97E-06	8.97E-06	8.97E-06	8.97E-06
TOTAL: (mrem/year)	0.043	0.049	0.064	0.072

Inadvertent Intruder

The identified credible exposure pathways for the inadvertent intruder are:

1.) External exposure from ground plane source (continuous occupancy)
2.) Vegetable ingestion pathway
3.) Resuspension inhalation pathway (continuous occupancy)
4.) Pathways identified due to release to Lake Michigan.

	AGE GROUP			
Pathway	Infant	Child	Teen	Adult
External	1.13E-01	1.13E-01	1.13E-01	1.13E-01
Vegetable	-	4.11E-04	4.43E-04	4.67E-04
Inhalation	2.96E-04	6.89E-04	1.44E-03	1.90E-03
Water	8.97E-06	8.97E-06	8.97E-06	8.97E-06
TOTAL: (mrem/year)	0.113	0.114	0.115	0.115

Reviewing these tables, the calculated limiting doses for both the maximally exposed individual and the inadvertent intruder occur for the adult age group. These doses are:

Maximally Exposed Individual:	0.072 mrem/year
Inadvertent Intruder:	0.115 mrem/year

APPENDIX F

BASIS FOR SETTING CONCENTRATION LIMITS AND ACTIVITY LIMIT FOR DISPOSAL OF SLUDGE

Analyses of previously disposed sewage sludge have identified six different radionuclides in the sludge. All six radionuclides did not occur in each disposal. Therefore, it is difficult to determine a single concentration limit for regulating the disposal of the sludge from the storage tanks.

To provide a basis to regulate the disposal of the sewage sludge based on identified radionuclide concentrations, the following relation is proposed.

$$\sum_{i=1}^{N} \frac{C_i}{0.1 * MPC_i} \leq 1$$

where

N = number of different radionuclides identified in the sewage sludge.

C_i = concentration of the ith radionuclide in the sewage sludge.

MPC_i = the MPC value of the ith radionuclide in the sewage sludge, as listed in 10 CFR Part 20 Appendix B, Table II, Column 2.

If this criteria is met, the sewage sludge may be disposed of by land spreading provided the dose calculations (as identified in Appendix E) indicate dose rates within the prescribed limits.

The attachment to this Appendix details calculations performed to determine doses from four radionuclides identified in the sludge. The calculations are based on an identified concentration equal to 10% of the 10 CFR Part 20, Appendix B, Table II, Column 2 valves. The calculations use the methodology in Appendix E along with the exposure pathways identified in Appendix D to determine the dose rates. These calculations indicate the use of this methodology will maintain radiation doses within the appropriate limits.

The maximum allowable activity disposed of per year per acre is calculated utilizing 10% of the MPC value, 10 CFR Part 20, Appendix B, Table II, Column 2, for Co-58. Volume limit per acre has been proposed at 4,000 gallons/acre/year. Then,

$$1.0E\text{-}05\ \mu Ci/cc * 4{,}000\ gallons/acre/year \times 3.785.43\ cc/gallon$$
$$= 151.4\ \mu Ci/acre/year$$

Cs-134

Concentration in Sludge: 9.0E-07 mCi/ml

Sludge Volume (Gallons)	(cm³)	Concentration (μCi/cm³)	Activity (μCi)	Ground Plane Concentration (μCi/cm²)
15000	5.68E+07	9.00E-07	5.11E+01	2.53E-07

External Exposure

γ Dose Factor (mrem/hr. per pCi/m²)	Ground Plane Concentration (pCi/m²)	γ Dose Rate (mrem/year)
1.20E-08	2.53E+03	2.66E-01

Continuous Occupancy: 2.66E-01 mrem/year
Realistic Occupancy: 1.94E-03 mrem/year

Meat & Milk Pathway

Activity in Soil (μCi)	Activity in Feed (μCi)	Concentration in Feed (pCi/Kg)	Concentration in Milk (pCi/ℓ)	Concentration in Meat (pCi/kg)
5.22E+01	5.11E-01	2.75E+01	1.65E+01	5.50E+00

Milk Dose Rates (mrem/year)

Infant	Child	Teenager	Adult
3.87E-01	4.41E-01	6.03E-01	6.19E-01

Meat Dose Rate (mrem/year)

Infant	Child	Teenager	Adult
-	1.83E-02	3.27E-02	7.32E-02

Vegetable Pathway

Activity (μCi)	Soil Volume (Cm³)	Soil Mass (Kg)	Concentration in Soil (pCi/Kg)	Concentration in Vegetables (pCi/Kg)
5.11E+01	3.08E+09	4.00E+06	1.28E+01	1.28E-01

Vegetable Pathway Dose Rates (mrem/year)

Infant	Child	Teenager	Adult
-	2.90E-03	3.98E-03	4.34E-03

Inhalation Pathway

Ground Plane Concentration (pCi/m²)	K_1 (m^{-1})	Air Concentration (pCi/m³)
2.53E+03	1.0E-05	2.53E-02

Inhalation Pathway Dose Rates (mrem/year)

	Infant	Child	Teenager	Adult
Continuous Occupancy	1.88E-03	5.68E-03	1.39E-02	1.84E-02
Realistic Occupancy	1.38E-05	4.15E-05	1.01E-04	1.35E-04

Release to Lake Michigan

Activity (µCi)	DF_i/DF_{Co-60}	Co-60 eq. activity (µCi)
5.11E+01	2.56E+01	1.31E+03

$$\frac{6\ \text{mrem}}{94.7\ \text{Ci}} * 1.31E+03 * \frac{1\ \text{Ci}}{1.0E+06\ \mu\text{Ci}} = 8.29E-05\ \text{mrem}$$

Maximally Exposed Individual

	Infant	Child	Teenager	Adult
External	1.94E-03	1.94E-03	1.94E-03	1.94E-03
Milk	3.87E-01	4.41E-01	6.03E-01	6.19E-01
Meat	-	1.83E-02	3.27E-02	7.32E-02
Vegetable	-	2.90E-03	3.98E-03	4.34E-03
Inhalation	1.38E-05	4.15E-05	1.01E-04	1.35E-04
Water	8.29E-05	8.29E-05	8.29E-05	8.29E-05
Totals:	3.89E-01	4.64E-01	6.42E-01	6.99E-01

Inadvertent Intruder

	Infant	Child	Teenager	Adult
External	2.66E-01	2.66E-01	2.66E-01	2.66E-01
Vegetable	-	2.90E-03	3.98E-03	4.34E-03
Inhalation	1.88E-03	5.68E-03	1.39E-02	1.84E-02
Water	8.29E-05	8.29E-05	8.29E-05	8.29E-05
Totals:	2.68E-01	2.75E-01	2.84E-01	2.89E-01

Cs-137

Concentration in Sludge: 2.0E-06 μCi/ml

Sludge Volume (Gallons)	Sludge Volume (cm^3)	Concentration (μCi/cm^3)	Activity (μCi)	Ground Plane Concentration (μCi/cm^2)
15000	5.68E+07	2.00E-06	1.14E+02	5.62E-07

External Exposure

γ Dose Factor (mrem/hr. per pCi/m^2)	Ground Plane Concentration (pCi/m^2)	γ Dose Rate (mrem/year)
4.20E-09	5.62E+03	2.07E-01

Continuous Occupancy: 2.07E-01 mrem/year
Realistic Occupancy: 1.51E-03 mrem/year

Meat & Milk Pathway

Activity in Soil (μCi)	Activity in Feed (μCi)	Concentration in Feed (pCi/Kg)	Concentration in Milk (pCi/ℓ)	Concentration in Meat (pCi/kg)
1.14E+02	1.14E+00	6.13E+01	3.68E+01	1.23E+01

Milk Dose Rates (mrem/year)

Infant	Child	Teenager	Adult
5.26E-00	5.61E-01	7.64E-01	8.15E-01

Meat Dose Rate (mrem/year)

Infant	Child	Teenager	Adult
-	2.33E-02	4.15E-02	9.56E-02

Vegetable Pathway

Activity (μCi)	Soil Volume (Cm^3)	Soil Mass (Kg)	Concentration in Soil (pCi/Kg)	Concentration in Vegetables (pCi/Kg)
1.14E+02	3.08E+09	4.00E+06	2.85E+01	2.85E-01

Vegetable Pathway Dose Rates (mrem/year)

Infant	Child	Teenager	Adult
-	3.69E-03	5.03E-03	5.70E-03

Inhalation Pathway

Ground Plane Concentration (pCi/m²)	K_{-1} (m^{-1})	Air Concentration (pCi/m³)
5.62E+03	1.0E-05	5.62E-02

Inhalation Pathway Dose Rates (mrem/year)

	Infant	Child	Teenager	Adult
Continuous Occupancy	2.56E-03	7.22E-03	1.75E-02	2.41E-02
Realistic Occupancy	1.87E-05	5.27E-05	1.28E-04	1.76E-04

Release to Lake Michigan

Activity (μCi)	DF_i/DF_{Co-60}	Co-60 eq. activity (μCi)
1.14E+02	1.51E+01	1.72E+03

$$\frac{6\ mrem}{94.7\ Ci} * 1.72E+03 * \frac{1\ Ci}{1.0E+06\ \mu Ci} = 1.09E-04\ mrem$$

Maximally Exposed Individual

	Infant	Child	Teenager	Adult
External	1.51E-03	1.51E-03	1.51E-03	1.51E-03
Milk	5.26E-01	5.61E-01	7.64E-01	8.15E-01
Meat	-	2.33E-02	4.15E-02	5.70E-03
Vegetable	-	3.69E-03	5.03E-03	5.70E-03
Inhalation	1.87E-05	5.27E-05	1.28E-04	1.76E-04
Water	1.09E-04	1.09E-04	1.09E-04	1.09E-04
Totals:	5.28E-01	5.90E-01	8.12E-01	9.19E-01

Inadvertent Intruder

	Infant	Child	Teenager	Adult
External	2.07E-01	2.07E-01	2.07E-01	2.07E-01
Vegetable	-	3.69E-03	5.03E-03	5.70E-03
Inhalation	2.56E-03	7.22E-03	1.75E-02	2.41E-02
Water	1.09E-04	1.09E-04	1.09E-04	1.09E-04
Totals:	2.10E-01	2.18E-01	2.30E-01	2.37E-01

Co-58

Concentration in Sludge: 1.00E-05 μCi/ml

Sludge Volume (Gallons)	(cm³)	Concentration (μCi/cm³)	Activity (μCi)	Ground Plane Concentration (μCi/cm²)
15000	5.68E+07	1.00E-05	5.68E+02	2.81E-06

External Exposure

γ Dose Factor (mrem/hr. per pCi/m²)	Ground Plane Concentration (pCi/m²)	γ Dose Rate (mrem/year)
7.00E-09	2.81E+04	1.72E+00

Continuous Occupancy: 1.72E+00 mrem/year
Realistic Occupancy: 1.26E-02 mrem/year

Meat & Milk Pathway

Activity in Soil (μCi)	Activity in Feed (μCi)	Concentration in Feed (pCi/Kg)	Concentration in Milk (pCi/ℓ)	Concentration in Meat (pCi/kg)
5.68E+02	5.34E+00	2.87E+02	1.44E+01	1.87E+02

Milk Dose Rates (mrem/year)

Infant	Child	Teenager	Adult
4.27E-02	2.62E-02	1.29E-02	7.45E-03

Meat Dose Rate (mrem/year)

Infant	Child	Teenager	Adult
-	4.22E-02	2.72E-02	3.44E-02

Vegetable Pathway

Activity (μCi)	Soil Volume (Cm³)	Soil Mass (Kg)	Concentration in Soil (pCi/Kg)	Concentration in Vegetables (pCi/Kg)
5.68E+02	3.08E+09	4.00E+06	1.42E-04	1.33E+00

Vegetable Pathway Dose Rates (mrem/year)

Infant	Child	Teenager	Adult
-	2.05E-03	1.01E-03	6.22E-04

Inhalation Pathway

Ground Plane Concentration (pCi/m²)	K_1 (m^{-1})	Air Concentration (pCi/m³)
2.81E+04	1.0E-05	2.81E-01

Inhalation Pathway Dose Rates (mrem/year)

	Infant	Child	Teenager	Adult
Continuous Occupancy	5.11E-04	8.89E-04	7.80E-04	5.82E-04
Realistic Occupancy	3.74E-06	6.49E-06	5.70E-06	4.25E-06

Release to Lake Michigan

Activity (μCi)	DF_i/DF_{Co-60}	Co-60 eq. activity (μCi)
5.68E+02	3.54E-01	2.01E+02

$$\frac{6 \text{ mrem}}{94.7 \text{ Ci}} * 2.01E{+}02 \ \mu Ci * \frac{1 \text{ Ci}}{1.0E{+}06 \ \mu Ci} = 1.27E{-}05 \text{ mrem}$$

Maximally Exposed Individual

	Infant	Child	Teenager	Adult
External	1.26E-02	1.26E-02	1.26E-02	1.26E-02
Milk	4.27E-02	2.62E-02	1.29E-02	7.45E-03
Meat	-	4.22E-02	2.72E-02	3.44E-02
Vegetable	-	2.05E-03	1.01E-03	6.22E-04
Inhalation	3.74E-06	6.49E-06	5.70E-06	4.25E-06
Water	1.27E-05	1.27E-05	1.27E-05	1.27E-05
Totals:	5.53E-02	8.31E-02	5.37E-02	5.51E-02

Inadvertent Intruder

	Infant	Child	Teenager	Adult
External	1.72E+00	1.72E+00	1.72E+00	1.72E+00
Vegetable	-	2.05E-03	1.01E-03	6.22E-04
Inhalation	5.11E-04	8.89E-04	7.80E-04	5.82E-04
Water	1.27E-05	1.27E-05	1.27E-05	1.27E-05
Totals:	1.72E+00	1.72E+00	1.72E+00	1.72E+00

Co-60

Concentration in Sludge: 5.0E-06 μCi/ml

Sludge Volume (Gallons)	Sludge Volume (cm^3)	Concentration ($\mu Ci/cm^3$)	Activity (μCi)	Ground Plane Concentration ($\mu Ci/cm^2$)
15000	5.68E+07	5.00E-06	2.84E+02	1.41E-06

External Exposure

γ Dose Factor (mrem/hr. per pCi/m^2)	Ground Plane Concentration (pCi/m^2)	γ Dose Rate (mrem/year)
1.70E-08	1.41E+04	2.09E+00

Continuous Occupancy: 2.09E+00 mrem/year
Realistic Occupancy: 1.53E-02 mrem/year

Meat & Milk Pathway

Activity in Soil (μCi)	Activity in Feed (μCi)	Concentration in Feed (pCi/Kg)	Concentration in Milk (pCi/ℓ)	Concentration in Meat (pCi/kg)
2.84E+02	2.67E+00	1.44E+02	7.18E+00	9.33E+01

Milk Dose Rates (mrem/year)

Infant	Child	Teenager	Adult
6.04E-02	3.70E-02	1.82E-02	1.05E-02

Meat Dose Rate (mrem/year)

Infant	Child	Teenager	Adult
-	5.97E-02	3.84E-02	4.84E-02

Vegetable Pathway

Activity (μCi)	Soil Volume (Cm^3)	Soil Mass (Kg)	Concentration in Soil (pCi/Kg)	Concentration in Vegetables (pCi/Kg)
2.84E+02	3.08E+09	4.00E+06	7.10E+01	6.67E-01

Vegetable Pathway Dose Rates (mrem/year)

Infant	Child	Teenager	Adult
-	2.91E-03	1.44E-03	8.82E-04

Inhalation Pathway

Ground Plane Concentration (pCi/m²)	K_1 (m^{-1})	Air Concentration (pCi/m³)
1.41E+04	1.0E-05	1.41E-01

Inhalation Pathway Dose Rates (mrem/year)

	Infant	Child	Teenager	Adult
Continuous Occupancy	1.66E-03	3.19E-03	2.80E-03	2.09E-03
Realistic Occupancy	1.21E-05	2.33E-05	2.05E-05	1.53E-05

Release to Lake Michigan

Activity (μCi)	DF_i/DF_{Co-60}	Co-60 eq. activity (μCi)

$$\frac{6\ \text{mrem}}{94.7\ \text{Ci}} * 2.84\text{E+02}\mu\text{Ci} * \frac{1\ \text{Ci}}{1.0\text{E+06}\ \mu\text{Ci}} = 1.80\text{E-05 mrem}$$

Maximally Exposed Individual

	Infant	Child	Teenager	Adult
External	1.53E-02	1.53E-02	1.53E-02	1.53E-02
Milk	6.04E-02	3.70E-02	1.82E-02	1.05E-02
Meat	-	5.97E-02	3.84E-02	4.84E-02
Vegetable	-	2.91E-03	1.44E-03	8.82E-04
Inhalation	1.21E-05	2.33E-05	2.05E-05	1.53E-05
Water	1.80E-05	1.80E-05	1.80E-05	1.80E-05
Totals:	7.57E-02	1.15E-01	7.34E-02	7.51E-02

Inadvertent Intruder

	Infant	Child	Teenager	Adult
External	2.09E+00	2.09E+00	2.09E+00	2.09E+00
Vegetable	-	2.91E-03	1.44E-03	8.82E-04
Inhalation	1.66E-03	3.19E-03	2.80E-03	2.09E-03
Water	1.80E-05	1.80E-05	1.80E-03	1.80E-03
Totals:	2.09E+00	2.10E+00	2.10E+00	2.09E+00

APPENDIX G

CALCULATIONAL METHODOLOGY FOR DETERMINING EXTERNAL DOSE RATES FROM RADIONUCLIDES AFTER INCORPORATION INTO SOIL

Wisconsin Electric utilizes QAD, a nationally recognized computer code, to perform shielding and dose rate analyses. The QAD computer code utilizes a point kernel methodology to calculate the dose rate at a specified point due to a given source of radiation.

QAD will be used to calculate the dose rate due to standing on a plot of land utilized for sludge disposal after the radionuclides have been incorporated into the plot by plowing. The following parameters will be used in the calculation:

- The total activity from all previous disposals will be corrected for radiological decay and used as the radionuclide source term.
- Appropriate values will be used to represent the surface area of the plot.
- The radionuclides will be assumed to be incorporated uniformly into the top six inches of soil.
- The dose rate will be calculated at a height of 1 meter above the ground plane at a depth of 5 centimeters in tissue. (Regulatory Guide 1.109 values).
- The density of the soil will be assumed to be 1.3 grams/cubic centimeter.

This calculated dose rate will be used to assess the radiological consequences of past disposals in conjunction with the consequences of proposed future disposals. The total radiological dose consequence of the past and the proposed disposal will be compared to the applicable limits to insure the dose is maintained at or below the limits.

APPENDIX F

Modifications to the Wisconsin Electric submittal to the United States Nuclear Regulatory Commission dated October 8, 1987 (VPNPD-87-430, NRC-87-104), Disposal by Land Application of Sewage Sludge Containing Minute Quantities of Radioactive Material.

MODIFICATION #1 TO NRC SUBMITTAL

CHANGE TO ORIGINAL SUBMITTAL

Section 3.2, Disposal Procedure (page 3)

Section 3.3, Administrative Procedure (page 4)

The requirements for sludge characterization (the determination of the chemical and physical properties of the sludge) contained in the sections referenced above are modified to allow characterization of the sludge on an annual basis.

BASIS/EXPLANATION

The October 8, 1987 submittal to the USNRC for permission to dispose of sewage treatment sludge containing minute quantities of radioactive material requires that, "prior to disposal the waste stream will be monitored to determine the physical and chemical properties of the sludge. ..." Subsequent to the submittal and the approval by the NRC, a new Wisconsin Pollutant Discharge Elimination System (WPDES) permit was issued to the Point Beach Nuclear Plant by the Wisconsin Department of Natural Resources on November 30, 1988. Both the new WPDES permit and the Point Beach Nuclear Plant Sludge Management Plan specify an annual required frequency for the evaluation of the sludge characteristics.

The original requirement to perform the characterization of the chemical and physical properties of the sewage sludge prior to each disposal has proven time consuming and costly for Wisconsin Electric Lab Services. Preparation of special analytical standards are required to complete the characterization study. The preparation of these standards, sample preparation, and the actual analyses are all manpower intensive and difficult to perform on a timely basis. This has led to requiring overtime for Lab Services personnel and support from outside companies. In order to better utilize the resources of Lab Services while maintaining the requirements of the WPDES permit, the frequency of sludge characterization in the October 8, 1987 submittal to the NRC should be changed to an annual requirement.

This change in the required frequency for determination of the sludge characteristics does not change the requirement to analyze the sewage sludge for radionuclide content or perform dose evaluations prior to each disposal.

APPENDIX G

Modifications to the Wisconsin Electric submittal to the United States Nuclear Regulatory Commission dated October 8, 1987 (VPNPD-87-430, NRC-87-104), Disposal by Land Application of Sewage Sludge Containing Minute Quantities of Radioactive Material.

MODIFICATION #2

CHANGE TO ORIGINAL SUBMITTAL

Section 3.3, Administrative Procedures (Page E-10)

The limitation on the annual volume of sludge disposal per acre contained in the section referenced above is modified to allow unlimited disposal provided the other requirements of this submittal are met.

BASIS/EXPLANATION

The October 8, 1987, submittal to the USNRC for permission to dispose of sewage treatment sludge containing minute quantities of radioactive material requires that "the annual disposal rate for each of the approved land spread sites will be limited to 4,000 gallons/acre, provided WDNR chemical composition, NRC dose guidelines, and concentration and activity limits are maintained within the appropriate values."

The original requirement to limit sewage sludge disposal to 4,000 gallons per acre is based on the assumption that the sewage sludge is contaminated with Co-58 at a concentration that is ten percent of the 10 CFR Part 20 Appendix B Table 2 Column 2 value. Past sewage sludge disposal experience has shown that the sludge may or may not be contaminated and, if it is, at concentrations far below ten percent of the performed prior to each sewage sludge disposal. With the removal of some of the land spread sites due to their use as a storage site for dry storage of spent fuel, this requirement is limiting our ability to dispose of the sewage sludge on the remaining approved land spread sites.

This removal of the annual volume of sewage sludge that may be disposed of per acre on approved land spread sites does not change the requirement to analyze the sewage sludge for radionuclide content or perform dose evaluations prior to each disposal.

This change was evaluated under SER 95-057, "Removal of licensee Commitment Involved With Sewage Sludge Disposal," 4/20/95.

MODIFICATION #2

- Depth to groundwater and bedrock shall be greater than 3 feet from the land surface elevation during use of any site.
- Sludge shall not be land spread in a floodway.
- Sludge shall not be land spread within 50 feet of a property line road or ditch unless the sludge is incorporated with the soil, in which case a minimum separation distance of at least 25 feet is required.
- The pH of the sludge-soil mixture shall be maintained at 6.5 or higher.
- Low areas of the approved fields, subject to seasonally high groundwater levels, are excluded from the sludge application.
- Crops for human consumption shall not be grown on the land for up to one year following the application of the sludge.
- The sludge shall be plowed, disked, injected or otherwise incorporated into the surface soil layer at appropriate intervals.

The flexibility implied in the latter provision for soil incorporation is intended to allow for crops which require more than a one year cycle. For the Point Beach disposal sites, alfalfa is a common crop which is harvested for several years after a single planting. Sludge disposal on an alfalfa plot constitutes good fertilization, but the plot cannot be plowed without destroying the crop. The alfalfa in this case aids in binding the layer of sludge on the surface of the plot. At a minimum, however, plowing (or disking or other method of injection and mixing to a nominal depth of 6 inches) shall be done prior to planting any new crop, regardless of the crop.

3.3 Administrative Procedures

Complete records of each disposal will be maintained. These records will include the concentration of radionuclides in the sludge, the total volume of sludge disposed, the total activity, the plot on which the sludge was applied, the results of the chemical composition determinations, and all dose calculations.

The annual unlimited disposal rate for each of the approved land spread sites will be ~~limited to 4,000 gallons/acre~~, provided WDNR chemical composition, NRC dose guidelines, and concentration and activity limits are maintained within the appropriate values.

The farmer leasing the site used for the disposal will be notified of the applicable restrictions placed on the site due to the land spreading of sewage sludge.

4.0 Evaluation of Environmental Impact

4.1 Site Characteristics

4.1.1 Site Topography

The disposal sites are located in the Town of Two Creeks in the northeast corner of Manitowoc County, Wisconsin, on the

E-10

APPENDIX H

Modifications to the Wisconsin Electric submittal to the US Nuclear Regulatory Commission dated October 8, 1987 (VPNPD-87-430, NRC-87-104), Disposal by Land Application of Sewage Sludge Containing Minute Quantities of Radioactive Material.

MODIFICATION #3 TO NRC SUBMITTAL

Change to Original Submittal

Section 3.2 of Attachment II of the October 8, 1987 letter to the NRC contains the commitment to perform a gamma isotopic analysis of sewage sludge samples prior to every sludge disposal on land surrounding PBNP. The analytical results are to be used to evaluate the dose consequences of the radionuclides entering the environment via this disposal pathway. As described in ODCM Section 7, the requirement for a radioisotopic analysis of the sewage sludge prior to every disposal on land surrounding PBNP is modified if the sludge has been shown to be clean and there is no reason to believe that the sludge is contaminated.

Basis/Explanation

Small μCi quantities of PBNP licensed materials (Co-58/60, Cs-134/137, Cr-51, and Mn-54) were found in PBNP sewage treatment plant (STP) sludge. Pursuant to of 10 CFR 20.302(a), Wisconsin Electric applied to the NRC for permission to dispose of the licensed material by applying the sludge to Wisconsin Electric land surrounding PBNP. In the October 8, 1987 application letter, Wisconsin Electric committed to gamma isotopic analysis of the sludge prior to every disposal in order to evaluate the dose consequences of this disposal and to compare radionuclide concentrations to the 10 CFR 20, Appendix B, maximum effluent concentrations. However, such analyses are not required if the sludge does not contain licensed material. If there is no reason to believe that the sludge is contaminated and if there is no pathway from the RCA to the STP, then there is no reason to analyze the sludge for radionuclides once it has been shown to be clean. Administrative controls and engineering modifications to PBNP have removed the pathway from the RCA to the STP as verified by subsequent analyses of the sludge under conditions required to obtain the environmental LLDs. These analyses have not revealed radionuclides attributable to PBNP. Pursuant to NRC HPPOS-221, a substance is clean if analyses under analytical parameters necessary to achieve the environmental LLDs does not reveal any licensed material. These LLDs define how hard you have to look. Below this detection level, ". . .the probability of undetected radioactivity is negligible and can be disregarded when considering the practicality of detecting such potential radioactivity from natural background. . ." (Docket No. 50-206, letter to J. E. Dyer from L. J. Cunningham dated September 6, 1991). Therefore the NRC criteria are met and there is no longer any reason to believe that the STP sludge is contaminated. However if plant conditions should change in a manner compromising the NRC criteria, radiological analysis must be made prior to each STP sludge land application until such time that the clean criteria are satisfied pursuant to subsequent NRC guidance.

RECM

RADIOLOGICAL EFFLUENT CONTROL MANUAL

Wisconsin
Electric
Power Company

DOCUMENT TYPE: Controlled Reference

CLASSIFICATION: MAJOR

REVISION: 1

EFFECTIVE DATE: April 15, 1999

PROCEDURE OWNER: Radiation Protection

TABLE OF CONTENTS

1.0 RADIOLOGICAL EFFLUENT CONTROL PROGRAM

1.1 Basis

The Radiological Effluent Control Program (RECP) shall conform to 10 CFR 50.36a for the control of radioactive effluents and maintaining doses to members of the public from radioactive effluents as low as reasonably achievable (ALARA). The RECP also is established to control the amount and concentrations of radioactivity in PBNP effluent pursuant to the following documents:

1.1.1 10 CFR 50.34a-Design objectives for equipment to control releases of radioactive material in effluents-nuclear power reactors,

1.1.2 10 CFR 50, Appendix A, Criterion 60-Control of releases of radioactive material to the environment,

1.1.3 10 CFR 50, Appendix A, Criterion 63-Monitoring fuel and waste storage,

1.1.4 10 CFR 50, Appendix A, Criterion 64-Monitoring radioactivity releases,

1.1.5 10 CFR 20.1302-Compliance with dose limits for individual members of tl public,

1.1.6 10 CFR 20.1501-General,

1.1.7 PBNP General Design Criterion 17-Monitoring Radioactivity Releases, and

1.1.8 PBNP General Design Criterion 70-Control of releases of radioactivity to the environment.

1.2 Basis Statement

Liquid effluent from the radioactive waste disposal system are diluted by the circulating water system prior to release to Lake Michigan. With two pumps operating per unit, the rated flow of the circulating water system is approximately 340,000 gpm per unit. Operation of a single circulating water pump per unit reduces the nominal flow rate by about 40%. Liquid waste from the waste disposal system may be discharged to the circulating water system of either unit via the service water return header. Because of the low radioactivity levels in the circulating water discharge, the concentrations of liquid radioactive effluents at this point are not measured directly. Instead, the concentrations in the circulating water discharge are calculated from the measured concentration of the liquid effluent, the discharge flow rate of the effluent and the nominal flow in the circulating water system.

The release of radioactive materials in liquid effluents to unrestricted areas is monitored and controlled to conform to the dose objectives in Section II.A of Appendix I to 10 CFR 50 and will be as low as reasonably achievable (ALARA) in accordance with the requirements of 10 CFR Parts 50.34a and 50.36a. The monitoring and control also is undertaken to keep the concentrations of radionuclides in PBNP liquid effluent released to unrestricted areas conforming to ten times the maximum effluent concentration (MEC) values specified in Table 2, Column 2 of Appendix B to 10 CFR 20.1001-20.2402. Furthermore, the appropriate portions of the liquid radwaste treatment systems will be used as required to keep the releases ALARA.

These actions provide reasonable assurance that the resulting average annual dose or dose commitment from liquid effluent from each unit of the Point Beach Nuclear Plant for any individual in an unrestricted area from all pathways of exposure will not exceed the 10 CFR 50, Appendix I dose objectives. Thus, discharge of liquid wastes not exceeding these release limits will not result in significant exposure to members of the public as a result of consumption of drinking water from the lake, even if the effect of potable water treatment systems on reducing radioactive concentrations of the water supply is conservatively neglected.

Prior to release to the atmosphere, gaseous wastes are mixed in the auxiliary building vent with the flow from at least one of two auxiliary building exhaust fans. Further dilution then occurs in the atmosphere. Release of radionuclides to the atmosphere is monitored and controlled so that effluents to unrestricted areas conform to the dose objectives of Sections II.B and C of Appendix I to 10 CFR 50. Monitoring and control also is undertaken to ensure that at the point of maximum ground concentration at the site boundary, the radionuclide concentrations in the atmosphere will conform to the limits specified in Table 2, Column 1 of Appendix B to 10 CFR 20. Furthermore, the appropriate portions of the gaseous radwaste treatment system are used as required to keep the radioactive releases to the atmosphere ALARA.

In order to achieve the dose objectives of Appendix I to 10 CFR 50 and the aforementioned concentration limits, the setpoints for releases to the atmosphere and to Lake Michigan utilize the methodology found in the Offsite Dose Calculation Manual. Setpoints for releases to the atmosphere are based on the dilution provided by building vents as well as the highest annual average χ/Q at the site boundary. Setpoints for releases to Lake Michigan are based only on dilution by circulation water. Together, control and monitoring provide reasonable assurance that the annual dose from each unit's effluents, to an individual in an unrestricted area will not exceed the dose objectives of Appendix I to 10 CFR 50.

Implementation of the RECP will keep average annual releases of radioactive material in PBNP effluents and their resultant committed effective dose equivalents at small percentages of the dose limits specified in 10 CFR 20.1301. At the same time, the methodology of implementing the RECP permits the flexibility of operation, compatible with considerations of health and safety, to assure that the public is provided with a dependable source of power even under unusual operating conditions which may temporarily result in releases higher than such numerical guides for design objectives set forth in Appendix I but still within levels that assure that the average population exposure is equivalent to small fractions of doses from natural background radiation.

Compliance with the provisions of Appendix I to 10 CFR Part 50 constitutes adequate demonstration of conformance to the standards set forth in 40 CFR Part 190 regarding dose commitment to individuals from the uranium fuel cycle.

1.3 Responsibilities

All required actions of the Radiological Effluent Control Program shall be conducted using approved procedures. The responsibility for the implementation of the approved procedures reside with the Manager-PBNP.

1.4 Manual Revisions

1.4.1 Revisions of the RECM shall be documented and reviews performed of the revisions shall be retained as required by TS 15.7.8.6. The review documentation shall contain:

a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the revision, and

b. A determination that the change will maintain the levels of radioactive effluent control required pursuant to 10 CFR 20.1302, 10 CFR 50.36a, Appendix I to 10 CFR 50, and 40 CFR 190.

1.4.2 Revisions shall become effective after review and approval pursuant to the appropriate PBNP administrative procedure and T.S. 15.7.8.7.

1.4.3 Revisions shall be submitted to the NRC in the form of a complete, legible copy of the entire manual either as part of, or concurrent with, the Annual Monitoring Report for the period of the report in which the revision was made. Each change shall be identified by markings in the margin of the affected pages, clearly indication the area of the page that was changed. Each copy shall indicate the date the revision was implemented.

1.5 RECP Parameters Reportable in the Annual Monitoring Report

Information relative to the monthly quantities of liquid, gaseous, and solid radioactive effluents released from PBNP and effluent volumes used in maintaining the releases within 10 CFR 20 limits shall be reported in the Annual Monitoring Report as follows:

1.5.1 Liquid Releases

a. Total radioactivity in curies released and average diluted discharge concentrations of the following release categories: gamma isotopic, gross alpha, tritium, and strontium (beta emitters other than tritium).

b. Total volume (in gallons) of liquid waste released into circulating water discharge.

c. Total volume (in gallons) of dilution water used.

d. The maximum concentration of tritium and gross gamma radioactivity released (averaged over the period of a single release).

e. Estimated monthly total radioactivity in curies of individual radionuclic released based on representative isotopic analyses.

f. Semiannual and annual totals of monthly quantities of individual radionuclides, as determined by isotopic analyses.

1.5.2 Releases to the Atmosphere

a. Total gross radioactivity (in Curies), by month, released of:

1. Noble Gases.

2. Halogens.

3. Particulates, subdivided into beta emitters (strontium, etc.), gross alpha, and gamma emitters.

4. Tritium.

b. Maximum release rate (for any one-hour period).

c. Estimated monthly total radioactivity (in Curies) released, by nuclide, i I-131, I-133, H-3, and radioactive particulates with half-lives greater than eight days, based on representative analyses performed by beta and by gamma isotopic analyses.

d. Semiannual and annual totals of monthly isotopic radionuclide quantities.

1.5.3 Solid Waste

a. The total amount of solid waste shipped, buried, or stored (in cubic feet).

b. Estimated total radioactivity and isotopic content (in Curies) determined by scaling factors, gamma isotopic and/or other suitable analyses.

c. The dates of shipment and burial site if shipped for burial.

d. The type of waste shall be indicated, i.e., dry activated waste, resins, evaporator concentrates, filters, scrap metal, asbestos, etc.

1.5.4 Doses

The air doses and the doses to the hypothetical maximum exposed individual calculated following the ODCM methodology shall be reported.

1.5.5 Explosive Gas Monitoring

In accordance with Note 7 to Table 3-2, a Special Circumstance Report shall be included in the Annual Monitoring Report if the Waste Gas Holdup System Explosive Gas Monitor is out of service for greater than 14 consecutive days.

1.6 Other RECP Reportable Events

1.6.1 Radioactive Effluent Non-Treatment

If the effluent treatment system for radioactive liquids or for releases to the atmosphere is inoperable and effluents are being discharged for 31 consecutive days without the treatment required to meet the release limits specified in Section 5.0, a special report shall be prepared and submitted to the Commission within thirty days which includes the following information:

a. Identification of the inoperable equipment or subsystem and the reason for inoperability.

b. Actions taken to restore the inoperable equipment to operable status.

c. Summary description of actions taken to prevent a recurrence.

1.6.2 Radioactive Effluent Release Limit Exceedence

If the quantity of radioactive material actually released in liquid or gaseous effluents during any calendar quarter exceeds twice the quarterly limit as specified in Section 5.0, a special report shall be prepared and submitted to the Commission within thirty days of determination of the release quantity.

The report must describe the extent of exposure of individuals to radiation or radioactive material, including as appropriate:

a. the corrective action(s) to be taken to reduce subsequent releases to prevent recurrence of exceeding the limits, including the schedule for achieving conformance with applicable limits, ALARA constraints, generally applicable environmental standards, and associated license conditions,

b. estimates of exposures to a member of the public, including the dose from any external storage units, such as the ISFSI and the SGSF, for compliance with 40 CFR 190 limits,

c. the levels of radiation and concentrations of radioactive materials involved, and

d. the cause of the elevated exposures, dose rates, or concentrations.

If the dose to any member of the public exceeds 75 mrem to the thyroid or 25 mrem to the whole body or any organ other than the thyroid, pursuant to 40 CFR 190, the report shall also contain a request for a variance from this standard pursuant to 40 CFR 190.11.

1.6.3 Major Change to Radioactive Liquid, Gaseous and Solid Waste Treatment Systems

Licensee initiated major changes to the radioactive waste treatment systems (liquid, gaseous, and solid) shall be reported to the U.S. Nuclear Regulatory Commission with the annual update to the FSAR for the period in which the major change was complete. The discussion of each change shall include:

a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59;

b. Information necessary to support the reason for the change;

c. A description of the equipment, components and processes involved and the interfaces with other plant systems;

d. An evaluation of the change, which shows how the predicted releases of radioactive materials in liquid effluents and gaseous effluents and/or quantity of solid waste will differ from those previously predicted in the license application and amendments thereto;

e. An evaluation of the change, which shows the expected maximum exposures to an individual in the unrestricted area and to the general population that differ from those previously estimated in the license application and amendments thereto;

f. An estimate of the exposure to plant operating personnel as a result of the change.

2.0 RADIOACTIVE EFFLUENT CONTROL

2.1 Liquid Radioactive Effluent Treatment System

The liquid radioactive effluent treatment system consists of those components or devices used to reduce radioactive material in liquid effluent. The system consists of the following:

2.1.1 blowdown evaporator or waste evaporator,

2.1.2 polishing demineralizers,

2.1.3 boric acid evaporator feed demineralizers,

2.1.4 boric acid evaporators,

2.1.5 boric acid evaporator condensate demineralizers.

2.2 Gaseous Radioactive Effluent Treatment System

The gaseous radioactive effluent treatment system consists of those components or devices utilized to reduce radioactive material in effluent released to the atmosphere. The system consists of the following:

2.2.1 gas decay tanks,

2.2.2 drumming area ventilation exhaust duct filter assembly,

2.2.3 Unit 1 and 2 containment purge exhaust filter assemblies,

2.2.4 air ejector decay duct filter assembly,

2.2.5 auxiliary building ventilation filter assembly (nominal 11,214 cfm exhaust pathway),

2.2.6 chemistry laboratory exhaust duct filter assembly, 2.2.7 service building ventilation exhaust duct filter assembly,

2.2.8 auxiliary building ventilation filter assemblies (nominal 34,150 cfm exhaust pathway).

2.3 Effluent Control and Accountability

2.3.1 Radiation Monitoring System

a. Description

The computerized Radiation Monitoring System (RMS) at Point Beach Nuclear Plant consists of area and process monitors. The effluent monitors are those process monitors that are designed to detect and measure radioactivity in liquid and gaseous releases from PBNP. A description of the liquid and gaseous effluent monitors and associated isolation and control functions are presented in Tables 2-1 and 2-2.

b. Calibration

Calibration of the RMS detectors is accomplished according to the procedures of the PBNP Health Physics Calibration Manual.

c. Setpoints

The methodology for determining effluent RMS detector setpoints is described in the ODCM.

d. Alarms

Response to alarms received from RMS effluent detectors is described in the PBNP RMS Alarm Setpoint and Response Book.

e. Effluent Detector Operability and Surveillance

Detector operability and surveillance requirements are addressed in Sections 3.0 and 4.0 of this manual.

2.3.2 Effluent Treatment Schematic

The liquid and gaseous waste processing flow paths, equipment, and radiation monitors are depicted in Figures 2-1 and 2-2.

TABLE 2-1
RADIOACTIVE LIQUID WASTE EFFLUENT MONITORS

CHANNEL NUMBER	NAME	CONTROL FUNCTION	DETECTOR TYPE
1 (2) RE-216	Containment Fan Coolers Liquid Monitors	None	Scintillation
RE-218	Waste Disposal System Liquid Monitor	Shuts waste liquid overboard	Scintillation
1 (2) RE-219	Steam Generator Blowdown Liquid Monitors	Shuts steam generator blowdown isolation valves, blowdown tank outlet valves and steam generator sample valves	Scintillation
RE-220	Spent Fuel Pool Liquid Monitor	None	Scintillation
RE-223	Waste Distillate Overboard Liquid Monitor	Shuts waste distillate overboard isolation valve	Scintillation
1 (2) RE-229	Service Water Discharge Monitors	None	Scintillation
RE-230	Retention Pond Discharge Liquid Monitor	None	Scintillation
1 (2) RE-222	Steam Generator Blowdown Tank Outlet Monitor	Shuts steam generator blowdown isolation valves and blowdown tank outlet valves	GM Tube

FIGURE 2-1

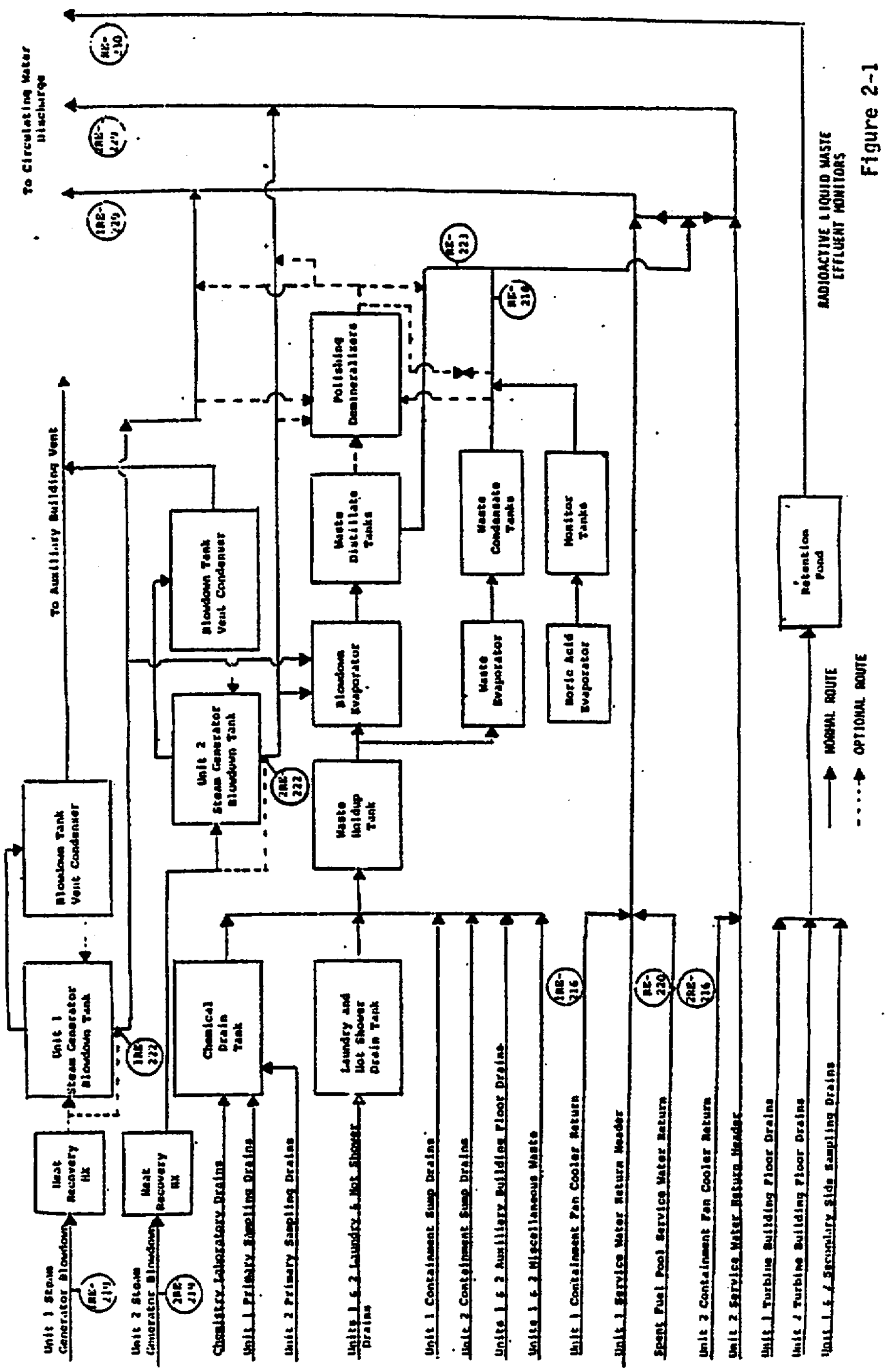
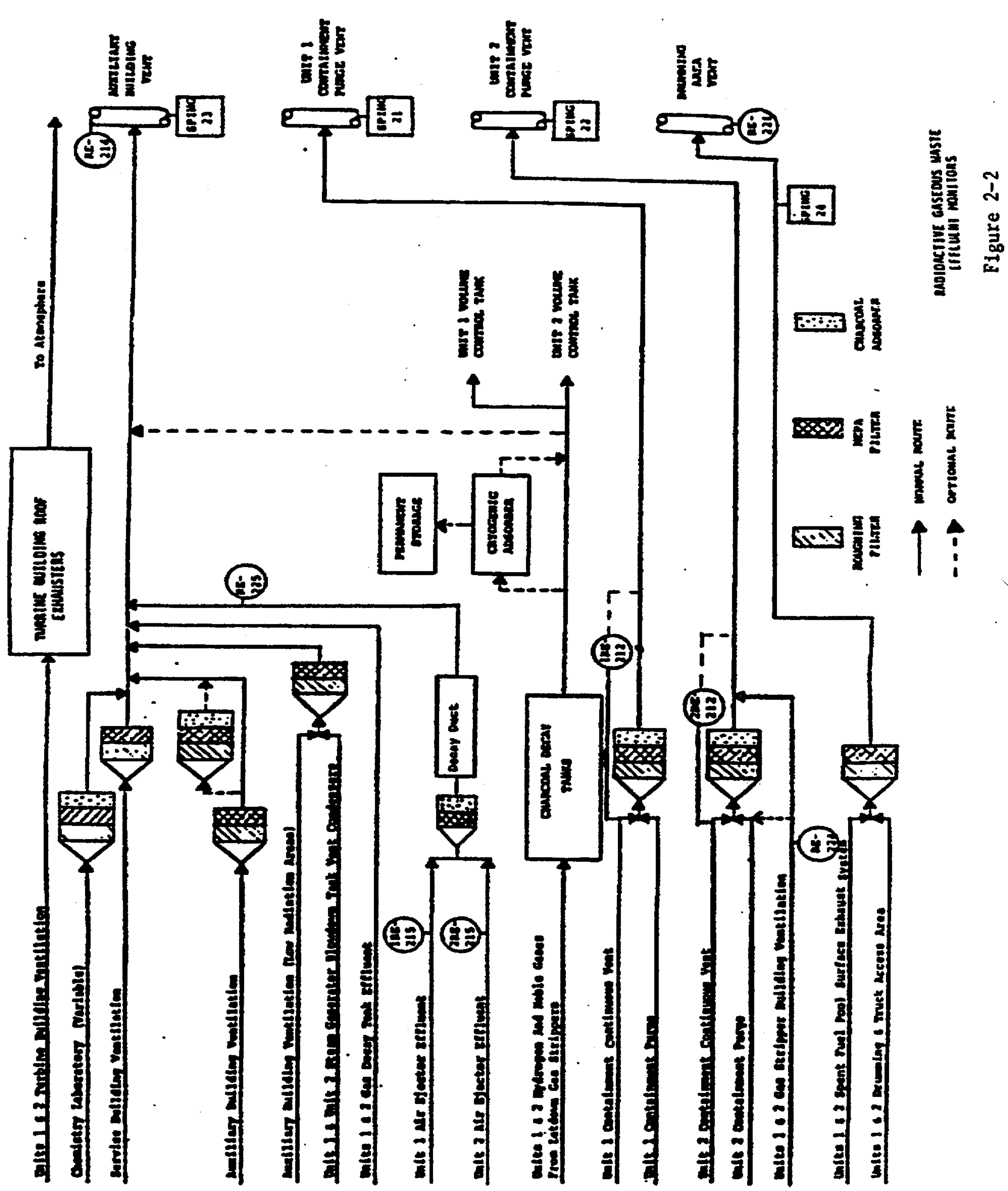

To Circulating Water Discharge
To Auxiliary Building Vent
Polishing Demineralizers
Waste Distillate Tanks
Waste Condensate Tanks
Monitor Tanks
Blowdown Tank Vent Condenser
Blowdown Evaporator
Waste Evaporator
Boric Acid Evaporator
Unit 2 Steam Generator Blowdown Tank
Waste Holdup Tank
Blowdown Tank Vent Condenser
Unit 1 Steam Generator Blowdown Tank
Chemical Drain Tank
Laundry and Hot Shower Drain Tank
Heat Recovery HX
Heat Recovery HX
Retention Pond
Unit 1 Steam Generator Blowdown
Unit 2 Steam Generator Blowdown
Chemistry Laboratory Drains
Unit 1 Primary Sampling Drains
Unit 2 Primary Sampling Drains
Units 1 & 2 Laundry & Hot Shower Drains
Unit 1 Containment Sump Drains
Unit 2 Containment Sump Drains
Units 1 & 2 Auxiliary Building Floor Drains
Units 1 & 2 Miscellaneous Waste
Unit 1 Containment Fan Cooler Return
Unit 1 Service Water Return Header
Spent Fuel Pool Service Water Return
Unit 2 Containment Fan Cooler Return
Unit 2 Service Water Return Header
Unit 1 Turbine Building Floor Drains
Unit 2 Turbine Building Floor Drains
Unit 1 & 2 Secondary Side Sampling Drains
NORMAL ROUTE
OPTIONAL ROUTE
RADIOACTIVE LIQUID WASTE EFFLUENT MONITORS
Figure 2-1

TABLE 2-2
RADIOACTIVE GASEOUS WASTE EFFLUENT MONITORS

CHANNEL NUMBER	NAME	CONTROL FUNCTION	DETECTOR TYPE
1 (2) RE-212	Containment Noble Gas Monitor	Actuates containment ventilation isolation	Scintillation
RE-214	Auxiliary Building Exhaust Ventilation Noble Gas Monitor	Shuts gas release valve and shifts auxiliary building exhaust through carbon filters	Scintillation
1 (2) RE-215	Condenser Air Ejector Noble Gas Monitors	None	Scintillation
RE-225	Combined Air Ejector Low-Range Noble Gas Monitor	None	Scintillation
RE-221	Drumming Area Vent Noble Gas Monitor	None	Scintillation
RE-224	Gas Stripper Building Exhaust Noble Gas Monitor	None	Scintillation
1 (2) RE-305	Unit 1 and 2 Purge Exhaust Noble Gas Monitors (Channel 5 on SPING Units No. 21 and No. 22)	Containment ventilation isolation	Scintillation
RE-315	Auxiliary Building Exhaust Ventilation Noble Gas Monitor (Channel 5 on SPING Unit No. 23)	None	Scintillation
RE-325	Drumming Area Ventilation Noble Gas Monitor (Channel 5 on SPING Unit No. 24)	None	Scintillation

FIGURE 2-2


To Atmosphere
TURBINE BUILDING ROOF EXHAUSTERS
UNIT 1 VOLUME CONTROL TANK
UNIT 2 VOLUME CONTROL TANK
PERMANENT STORAGE
CRYOGENIC ADSORBER
Decay Duct
CHARCOAL DECAY TANKS
ROUGHING FILTER
HEPA FILTER
CHARCOAL ADSORBER
NORMAL ROUTE
OPTIONAL ROUTE
RADIOACTIVE GASEOUS WASTE EFFLUENT MONITORS
Figure 2-2

2.3.3 Release Accountability

Control and accountability of radioactivity in PBNP effluents is accomplished by the RMS in conjunction with the characterization of radionuclide distributions by laboratory analyses of grab samples from the various waste streams. Sampling frequencies and analysis requirements are set forth in Section 6.0 of this manual. Additional aspects of grab sampling and release accountability are described in the PBNP Release Accountability Manual.

3.0 RADIOACTIVE EFFLUENT MONITORING INSTRUMENTATION OPERABILITY REQUIREMENTS

3.1 Objective

The operability of detectors is specified in order to ensure that liquid and gaseous radioactive effluents are adequately monitored and to ensure that alarm or trip setpoints are established such that effluent releases do not exceed the values cited in Section 5.0.

3.2 Operability Specifications

3.2.1 The radioactive effluent monitoring instrumentation channels listed in Tables 3-1 and 3-2 shall be operable. The alarm or trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

3.2.2 If fewer than the minimum number of radioactive effluent monitoring channels are operable, the action statement listed in either Table 3-1 or 3-2 opposite the channel shall be taken. Best effort shall be made to return an inoperable channel to operable status within 30 days. If the channel is not returned to an operable status within 30 days, the circumstances of the instrument failure and schedule for repair shall be reported to the NRC Resident Inspector.

3.2.3 If a radioactive effluent monitoring instrumentation channel alarm or trip setpoint is found less conservative than required by the ODCM, the channel shall be declared inoperable or the setpoint shall be changed to the ODCM value or a more conservative value.

TABLE 3-1
RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

Instrument			Minimum Channels Operable	Action
1.	Liquid Radwaste System			
	a.	RE-223, Waste Distillate Tank Discharge, or RE-229, Service Water Discharge (for applicable unit)	1	Note 1
	b.	RE-218, Waste Condensate Tank Discharge, or RE-229, Service Water Discharge (for applicable unit)	1	Note 1
	c.	Waste Condensate Tank Discharge Flow Meter	1	Note 4
	d.	Waste Distillate Tank Flow Rate Recorder	1	Note 4
2.	Steam Generator Blowdown System			
	a.	For Each Unit; RE-219, Steam Generator Blowdown Liquid Discharge, or RE-222, Blowdown Tank Monitor, or RE-229, Service Water Discharge	1	Note 2
	b.	Steam Generator Blowdown Flow Indicators (1 per steam generator)	1	Note 9
3.	Service Water System			
	a.	RE-229, Service Water Discharge (1 per unit)	1	Note 3
	b.	For Each Unit; RE-216, Containment Cooling Fan Service Water Return, or RE-229, Service Water Discharge	1	Note 3
	c.	RE-220, Spent Fuel Pool Heat Exchanger Service Water Outlet or RE-229, Service Water Discharge (for applicable unit)	1	Note 3

Table 3-1

4. Retention Pond Discharge System

a.	RE-230, Retention Pond Discharge	1	Note 3
b.	Retention Pond Discharge Composite Sampler	1	Note 8
c.	Retention Pond Discharge Flow Determination	NA	*

* Retention pond discharge flow may be determined from pump run time and pump performance curves.

RADIOLOGICAL EFFLUENT CONTROL MANUAL

TABLE 3-2
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

Instrument			Minimum Channels Operable	Action
1.	Gas Decay Tank System			
	a.	RE-214, Noble Gas (Auxiliary Building Vent Stack), or RE-315 Noble Gas (Auxiliary Building Vent SPING)	1	Note 1
	b.	Gas Decay Tank Flow Measuring Meter	1	Note 4
2.	Auxiliary Building Ventilation System			
	a.	RE-214, Noble Gas (Auxiliary Building Vent Stack) or Re-315, Noble Gas (Auxiliary Building Vent SPING)	1	Note 6
	b.	Isokinetic Iodine and Particulate - Continuous Air Sampling System	1	Note [illegible]
3.	Condenser Air Ejector System			
	a.	RE-225, Noble Gas (Combined Air Ejector Discharge Monitor); or RE-215, Noble gas (Air Ejector Monitors - 1 per unit); or RE-214, Noble Gas (Auxiliary Building Vent Stack); or RE-315, Noble Gas (Auxiliary Building Vent SPING)	1	Note 6
	b.	Flow Rate Monitor - Air Ejectors	1	Note 9

Table 3-2

Instrument		Minimum Channels Operable	Action
4.	Containment Purge and Vent System		
a.	RE-212, Noble Gas Monitors (1 per unit); or RE-305, Noble Gas (Purge Exhaust SPING - 1 per unit)	1	Note 6
b.	30 cfm Forced Vent Path Flow Indicators	1	Note 6
c.	Iodine and Particulate - Continuous Air Samplers	1	Note 5
d.	Sampler Flow Rate Measuring Device	1	Note 6
5.	Fuel Storage and Drumming Area Ventilation System		
a.	RE-221, Noble Gas (Drumming Area Stack), or RE-325, Noble Gas (Drumming Area SPING)	1	Note 6
b.	Isokinetic Iodine and Particulate - Continuous Air Sampling System	1	Note 5
6.	Gas Stripper Building Ventilation		
a.	RE-224, Noble Gas (Gas Stripper Building), or RE-305, (Unit 2 Purge Exhaust SPING)	1	Note 6
b.	Iodine and Particulate - Continuous Air Sampler	1	Note 5
c.	Sampler Flow Rate Measuring Device	1	Note 9
7.	Waste Gas Holdup System Explosive Gas Monitoring System		
a.	Oxygen Monitor	1	Note 7

NOTATIONS FOR TABLES 3-1 AND 3-2

Note 1: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided that prior to initiating a release, two separate samples are analyzed by two technically qualified people in accordance with the applicable part of Tables 6-1 and 6-2 and the release rate is reviewed by two technically qualified people.

Note 2: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided grab samples are analyzed for gamma radioactivity in accordance with Table 6-1 at least once every 24 hours when the secondary coolant specific activity is less than 0.01 μCi/cc dose equivalent I-131 or once every 12 hours when the activity is greater than 0.01 μCi/cc dose equivalent I-131.

Note 3: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided that at least once every 12 hours grab samples are collected and analyzed in accordance with Table 6-1.

Note 4: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided the flow rate is estimated at least once every four hours during actual gaseous or liquid batch releases.

Note 5: If the number of channels operable is fewer than the minimum required, effluent relea via the affected pathway may continue provided samples are continuously collected wi auxiliary sampling equipment.

Note 6: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided grab samples are collected at least once per 12 hours and are analyzed in accordance with Table 6-2.

Note 7: If the number of channels operable is fewer than the minimum required, addition of waste gas to the Waste Gas Holdup System may continue for up to 14 days, provided grab samples are taken from the on-service gas decay tank and analyzed either daily during normal operations or every four hours when the primary system is being degassed (other than normal gas stripping of the letdown flow). If the monitoring system is out of service for greater than 14 days, in addition to the above sampling, a report of the cause and corrective action for failure and repair of the gas monitor shall be included in the Annual Monitoring Report.

Note 8: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided grab samples are collected twice per week and analyzed in accordance with Table 6-1.

Note 9: If the number of channels operable is fewer than the minimum required, effluent releases via this pathway may continue provided the flow is estimated or determined with auxiliary indication at least once every 24 hours.

4.0 RADIOACTIVE EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

4.1 Objective

To verify that radioactive liquid and gaseous effluent monitoring instrumentation is demonstrated to be operable by periodic inspection, testing, and calibration.

4.2 Radioactive Monitoring Instrumentation Surveillance Requirements

Each radioactive effluent monitoring instrumentation channel shall be demonstrated operable by performance of the channel check, calibration, functional test, and source check at the frequencies shown in Tables 4-1 and 4-2.

4.3 Definitions

4.3.1 Source Check

The assessment of channel response by exposing the channel detector to a source of increased radiation.

4.3.2 Channel Check

A qualitative determination of acceptable operability by observing channel behavior during operation. This shall include comparison of the channel with other independent channels measuring the same variable.

4.3.3 Functional Test

The injection of a simulated signal into the channel to verify that it is operable, including alarm and/or trip initiating action.

TABLE 4-1
RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

Instrument Description	Channel Check	Calibrate	Functional Test	Source Check
1. Liquid Radwaste System				
a. RE-223, Waste Distillate Tank Discharge	D	R	Q	P
b. RE-218, Waste Condensate Tank Discharge	D	R	Q	P
c. Waste Condensate Tank Discharge Flow Meter	P/D	R	NA	NA
d. Waste Distillate Tank Flow Rate Recorder	P/D	R	NA	NA
2. Steam Generator Blowdown System				
a. RE-219, Steam Generator Blowdown Liquid Discharge (1 per unit)	D	R	Q	M
b. RE-222, Blowdown Tank Monitor (1 per unit)	D	R	Q	M
c. Steam Generator Blowdown Flow Indicator (1 per steam generator)	D	R	NA	NA

Table 4-1

Instrument Description	Channel Check	Calibrate	Functional Test	Source Check
3. Service Water System				
a. RE-229, Service Water Discharge (1 per unit)	D	R	Q	M
b. RE-216, Containment Cooling Fan Service Water Return (1 per unit)	D	R	Q	M
c. RE-220, Spent Fuel Pool Heat Exchanger Service Water Outlet	D	R	Q	M
4. Retention Pond Discharge System				
a. RE-230, Retention Pond Discharge	D	R	Q	M
b. Retention Pond Discharge Composite Sampler	W	NA	NA	NA
c. Retention Pond Discharge Effluent Sump Pumps	W	R	NA	NA

TABLE 4-2
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

Channel Description	Channel Check	Calibrate	Functional Test	Source Check
1. Gas Decay Tank System				
a. RE-214, Noble Gas (Auxiliary Building Vent Stack	D	R	Q	M
b. Gas Decay Tank Flow Measuring Device	P	R	NA	NA
2. Auxiliary Building Ventilation System				
a. RE-214, Noble Gas (Auxiliary Building Vent Stack)	D	R	Q	M
b. RE-315, Noble Gas (Auxiliary Building SPING	D	R	Q	M
c. Isokinetic Iodine and Particulate Continuous Air Sampling System	W	R	NA	NA

Table 4-2

Channel Description	Channel Check	Calibrate	Functional Test	Source Check
3. Condenser Air Ejector System				
a. RE-225, Noble Gas (Combined Air Ejector Discharge)	D	R	Q	M
b. RE-215, Noble Gas (Air Ejectors - 1 per unit)	D	R	Q	M
c. Flow Rate Monitor - Air Ejectors (1 per unit)	D	R	NA	NA
4. Containment Purge and Vent System				
a. RE-212, Noble Gas (1 per unit)	D	R	Q	M*
b. 30 cfm Vent Path Flow Indicator	P/D	R	NA	NA
c. RE-305, Noble Gas (Purge Exhaust SPING - 1 per unit)	D	R	Q	M*
d. Iodine and Particulate Continuous Air Sampler	P/W	NA	NA	NA
e. Sampler Flow Rate Measuring Device	P/D	R	NA	NA

Table 4-2

Channel Description			Channel Check	Calibrate	Functional Test	Source Check
5.	Fuel Storage and Drumming Area Ventilation Stack					
	a.	RE-221, Noble Gas (Drumming Area Vent Stack)	D	R	Q	M
	b.	RE-325, Noble Gas (Drumming Area SPING)	D	R	Q	M
	c.	Isokinetic Iodine and Particulate Continuous Air Sampling System	W	NA	NA	NA
6.	Gas Stripper Building Ventilation System					
	a.	RE-224 Noble Gas	D	R	Q	M
	b.	Iodine and Particulate Continuous Air Sampler	W	NA	NA	NA
	c.	Sampler Flow Rate Measuring Device	W	R	NA	NA
7.	Waste Gas Holdup System Explosive Gas Monitoring System					
	a.	Oxygen Monitor	D	Q**	Q	NA

NOTATIONS FOR TABLES 4-1 AND 4-2

D	=	Daily
W	=	Weekly
M	=	Monthly
Q	=	Quarterly
R	=	Each Refueling Interval
P/D	=	Prior to or immediately upon initiation of a release or daily if a release continues for more than one day
P/W	=	Prior to or immediately upon initiation of a release or weekly if a release continues for more than one week
P	=	Prior to or immediately upon initiation of a release
*	=	Source check required prior to containment purge
**	=	The channel calibration shall include the use of standard gas samples appropriate to the recommendations of the manufacturer of the gas analyzer equipment in use and include calibration points in the range of interest.
NA	=	not applicable

5.0 RADIOACTIVE EFFLUENT RELEASE LIMITS

5.1 Objective

To ensure controlled releases of radioactive materials in liquid and gaseous effluents to unrestricted areas are within applicable 10 CFR 20 concentration limits and to ensure the quantities of radioactive material released during any calendar year are such that resulting radiation exposures do not exceed the dose objectives of 10 CFR 50, Appendix I.

5.2 Radioactive Liquid Effluent Concentrations

5.2.1 Alarm setpoints for liquid effluent monitors shall be determined and adjusted utilizing the methodologies and parameters given in the ODCM.

5.2.2 The liquid effluent monitor setpoints shall be established to ensure that radioactive materials released as effluents shall not result in concentrations to unrestricted areas in excess of ten times the concentration values specified in Appendix B, Table 2, Column 2, of 10 CFR 20.1001-20.2402.

5.2.3 During release of radioactive liquid effluents, at least one condenser circulating water pump shall be in operation and the service water return header shall be lined up only to the unit whose circulating water pump is operating.

5.3 Radioactive Liquid Effluent Release Limits

5.3.1 The annual calculated total quantity of radioactive material above background released from PBNP in liquid effluents shall not result in an unrestricted area estimated annual dose or dose commitment from all exposure pathways to any individual in excess of 6 millirem to the total body or 20 millirem to any organ.

5.3.2 For the purpose of initiating the use of the liquid effluent treatment system whenever the projected dose for a period of 31 days will exceed 2% of the dose guidelines of Appendix I to 10 CFR 50, the 2% of the Appendix I values, as given in Section 5.3.1, are 0.12 mrem for the whole body and 0.4 mrem for any organ.

5.3.3 Quarterly limits are defined as one-half of the annual limits.

5.3.4 Compliance with these release limits will be demonstrated by periodic dose calculations utilizing the methodology of the ODCM.

5.4 Radioactive Gaseous Effluent Concentrations

5.4.1 Alarm setpoints for the gaseous effluent monitors shall be determined and adjusted utilizing the methodologies and parameters given in the ODCM.

5.4.2 The gaseous effluent monitor setpoints are established to ensure that radioactive materials released shall not result in concentrations to unrestricted areas in excess of the values specified in 10 CFR 20, Appendix B, Table 2.

5.4.3 During the release of radioactive gaseous effluents from the gas decay tanks through the auxiliary building vent, at least one auxiliary building exhaust fan shall be in operation.

5.5 Radioactive Gaseous Effluent Release Limits

5.5.1 The annual calculated total quantity of radioactive materials above background released from PBNP to the atmosphere shall not result in an unrestricted area estimated annual dose or dose commitment from all exposure pathways to any individual in excess of the following:

a. 10 millirem to the total body or 30 millirem to the skin from gaseous effluents near ground level;

b. 30 millirem to any organ from all I-131, I-133, H-3 and radioactive materials in particulate form whose half-life is > 8 days; and

c. Furthermore, the annual air dose from gaseous effluents at any location near ground level which could be occupied by individuals in unrestricted areas shall not exceed 20 millirads for gamma radiation or 40 millirads for beta radiation.

5.5.2 For the purpose of initiating the use of the atmospheric effluent treatment system whenever the projected dose for a period of 31 days will exceed 2% of the dose guidelines of Appendix I to 10 CFR 50, the 2% of the Appendix I values, as given in Section 5.5.1, are:

a. 0.2 mrem to the total body and 0.6 mrem to the skin, and

b. 0.6 mrem to any organ.

5.5.3 Quarterly limits are defined as one-half of the annual limits.

5.5.4 Compliance with these release limits will be demonstrated by periodic dose calculations utilizing the methodology of the ODCM.

5.6 Atmospheric Release Rate Limitations

The rate of release of radioactive effluents to the atmosphere from the site, which if continued for one year, shall not result in dose rates at or beyond the site boundary that exceed the following values.

5.6.1 For noble gases:

a. 500 mrem/yr to the total body

b. 3000 mrem/yr to the skin

5.6.2 For I-131, I-133, H-3, and all particulate form radionuclides with a half-life > 8 days:

1500 mrem/yr to any organ

5.6.3 The instantaneous, limiting release rates for the above annual rates, are calculated in Section 3.10 of the ODCM for various release types. Below are default values for various releases. Check the ODCM for the methodology to calculate release rates for more specific radionuclide mixtures or contact the cognizant Radiological Engineer.

a. For noble gases, the whole body dose is limiting yielding a rate of 8.73E-02 Ci/sec.

b. For particulates, radioiodines and H-3, as described above, the release rates are

1.14E-06 Ci/sec for radioiodines

1.30E-06 Ci/sec for cesiums

2.16E-05 Ci/sec for cobalts

3.62E-01 Ci/sec for H-3

As a conservative measure, the limiting release rate should be applied to the whole radionuclide mixture based upon the presence or absence of the above major dose contributors.

5.7 Cumulative and Projected Doses

5.7.1 Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year, in accordance with the methodology and parameters of the ODCM, shall be made at least every 31 days.

5.7.2 Because of the length of time required to complete all facets of the required calculations and to obtain the radioanalytical results for effluent samples sent to a contracted analytical laboratory, the determination of the current quarter dose may not be finished until the following quarter.

5.7.3 If the calculations required by Sections 5.3.4 or 5.5.4 exceed the corresponding quarterly limit during any calendar quarter, a special report will be prepared and submitted per Technical Specification 15.7.8.4.D.

5.7.4 If the calculations required by Sections 5.3.4 or 5.5.4 demonstrate that quarterly releases exceed the quarterly limit, corrective actions shall be taken to ensure that subsequent releases in that calendar year will be in compliance with quarterly and annual limits.

5.8 Radioactive Effluent Treatment

5.8.1 The gaseous radioactive effluent treatment system shall be operated whenever the projected dose for a 31 day period, from I-131, I-133, H-3, and radioactive particulates with a half-life > 8 days, exceeds the values of Section 5.5.2 (2% of the Appendix I values). If the gaseous effluent treatment system becomes inoperable, the effluent reporting requirements of Section 1.6 shall apply.

a. A gas decay tank(s) shall be operated whenever required to maintain gaseous releases within the limits of Section 5.5.2.a.

b. The auxiliary building ventilation exhaust charcoal filter shall be operated when required to maintain gaseous releases within the limit of Section 5.5.2.b for radioiodines.

c. The air ejector charcoal filter shall be operated when required to maintain releases within the limit of Section 5.5.2.b for radioiodines.

5.8.2 The liquid radioactive effluent treatment system shall be operated whenever the projected dose for a 31 day period exceeds the values of Section 5.3.4 (2% of the Appendix I values). If the liquid effluent treatment system becomes inoperable, the effluent reporting requirements of Section 1.6 shall apply.

5.9 Total Dose

5.9.1 Compliance with the provisions of Appendix I to 10 CFR 50 is adequate demonstration of conformance to the standards set forth in 40 CFR 190.

5.9.2 If the calculations required by 5.3.4 or 5.5.4 exceed twice the annual dose objectives of Sections 5.3 and 5.5 , dose calculations shall be performed as described in the ODCM and shall include direct radiation contributions from reactor units and from any outside storage tanks in addition to effluent pathways.

5.9.3 A report will be submitted to the Commission within 30 days upon completion of the dose calculations required by Section 5.9.2, if the calculated dose to any member of the general public exceeds the 40 CFR 190 annual dose limits.

5.10 Explosive Gas Mixture

5.10.1 The concentration of oxygen in the on-service gas decay tank shall be limited to less than or equal to 4% by volume.

5.10.2 If the concentration of oxygen in the on-service gas decay tank is greater th 4% by volume, immediately suspend all additions of waste gases to the on-service gas decay tank.

5.10.3 Reduce the oxygen concentration to less than 4% oxygen by volume as soon as possible. If the on-service gas decay tank is at or near capacity and the tank must be isolated to permit the required decay time to conform with dose objectives of Appendix I to 10 CFR 50, it will not be possible to immediately reduce the oxygen concentration. In this case, the tank will be isolated and the oxygen concentration reduced as soon as the gas decay requirements are satisfied.

5.11 Solid Radioactive Waste

The solid radwaste system shall be used in accordance with the Process Control Program to process radioactive wastes to meet all shipping and burial ground requirements. If the provisions of the Process Control Program are not satisfied, shipments of defectively processed or defectively packaged radioactive waste from the site will be suspended. The Process Control Program shall be used to verify solidification of radwaste.

6.0 RADIOACTIVE EFFLUENT SAMPLING AND ANALYSIS REQUIREMENTS

6.1 Purpose

Pursuant to the requirements of 10 CFR 20.1302, the purpose of this section is to specify the sampling frequency, the analysis frequency, and analysis requirements for radioactive liquid and gaseous effluents in order to verify that the concentrations and quantities of radioactive material released from the site in liquid and gaseous effluents do not exceed the objectives specified in Section 5.0.

6.2 Radioactive Liquid Waste Sampling and Analysis

The concentration of radioactivity in liquid waste shall be determined by sampling and analysis in accordance with Table 6-1.

6.3 Radioactive Gaseous Waste Sampling and Analysis

The concentration of radioactivity in gaseous wastes shall be determined by sampling and analyses in accordance with Table 6-2.

TABLE 6-1
RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

Liquid Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis[5]	Lower Level of Detection[1] (µCi/cc)
1. Batch Releases[2] a. Waste Condensate Tank b. Waste Distillate Tank c. Monitor Tanks d. Other tanks containing radioactivity to be discharged	Prior to Release	Prior to Release	Gamma Emitters I-131	5×10^{-7} 1×10^{-6}
		Monthly on composites obtained from batches released during the current month	Gross Alpha Tritium	1×10^{-7} 1×10^{-5}
		Quarterly on composites obtained from batches released during the current quarter	Sr-89/90	5×10^{-8}

Table 6-1

2. Continuous Releases[3]

a. Steam Generator Blowdown	Grab Samples Twice Weekly	Twice Weekly	Gamma Emitters I-131	5×10^{-7} 1×10^{-6}
b. Service Water		Monthly on Grab Composites	Gross Alpha Tritium	1×10^{-7} 1×10^{-5}
		Quarterly on Grab Composites	Sr-89/90	5×10^{-8}
c. Retention Pond	Continuous Composite[4]	Weekly	Gamma Emitters I-131	5×10^{-7} 1×10^{-6}
		Monthly on Weekly Composite	Gross Alpha Tritium	1×10^{-7} 1×10^{-5}
		Quarterly on Monthly Composite	Sr-89/90	5×10^{-8}

NOTES FOR TABLE 6-1

1. The principal gamma emitter for which the gamma isotopic LLD applies is Cs-137. Because gamma isotopic analyses are performed, the LLDs for all other gamma emitters are inherently determined by the operating characteristics of the counting system. All identifiable gamma emitters will be reported in the Annual Monitoring Report.

2. A batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses each batch shall be isolated and mixed to assure representative sampling.

3. A continuous release is the discharge of liquid wastes of a non-discrete volume; e.g., from a volume of a system that has an input flow during the release.

4. A continuous composite is one in which the method of sampling employed results in a specimen that is representative of the liquids released.

5. Identified entrained noble gases shall be reported as gaseous effluents.

TABLE 6-2
RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

Gaseous Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Level of Detection[1] (μCi/cc)
1. Gas Decay Tank	Prior to Release	Prior to Release	Gamma Emitters	1×10^{-4}
2. Containment Purge or Continuous Vent	Prior to Purge[2] or Vent	Prior to Purge or Vent	Gamma Emitters Tritium	1×10^{-4} 1×10^{-6}
3. Continuous Releases: a. Unit 1 Containment Purge and Vent b. Unit 2 Containment Purge and Vent c. Drumming Area Vent d. Gas Stripper Building Vent e. Auxiliary Building Vent	Continuous[3]	Weekly Analysis of Charcoal and Particulate Samples	Gamma Emitters I-131	1×10^{-11} 1×10^{-12}
		Monthly Composite of Particulate Sample	Gross Alpha	1×10^{-11}
		Quarterly Composite of Particulate Sample	Sr-89/90	1×10^{-11}
		Noble Gas Monitor	Noble gases Gross Beta or gamma	1×10^{-6}
	Monthly[4] (Grab)	Monthly	Gamma Emitters	1×10^{-4}
		Monthly	Tritium	1×10^{-6}

NOTES FOR TABLE 6-2

1. The principal gamma emitters for which the LLD specification applies are Cs-137 in particulates and Xe-133 in gases. Because gamma isotopic analyses are performed, the LLDs for all other gamma emitters are inherently determined by the operating characteristics of the counting system. All identifiable gamma emitters will be reported in the Annual Monitoring Report.

2. Tritium grab samples will be taken every 24 hours when the refueling cavity is flooded.

3. The ratio of the sample flow rate to the release flow rate shall be known or estimated for the time period covered by each sampling interval.

4. Tritium grab samples will be taken every seven days from the drumming area ventilation exhaust/spent fuel pool area whenever there is spent fuel in the spent fuel pool.