Environmental Report

Revision 3, September 2004
Including Page Removal and Insertion Instructions

NATIONAL ENRICHMENT FACILITY
ENVIRONMENTAL REPORT, REVISION 3
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Depleted uranium material is desublimed at the Tails Low-Temperature Take-Off Station into chilled Uranium Byproduct Cylinders (UBCs), Type 48Y. The product is desublimed into 30B cylinders for shipping or Type 48Y for internal use.

The entire plant process gas system operates at sub-atmospheric pressure. This provides a high degree of safety but also means that the system is susceptible to in-leakage of air. Any in-leakage of air passes through the cascades and is preferentially directed into the product stream. A vent system is provided to remove hazardous contaminants from low levels of light gas (any gas lighter than UF_6) that arise on a regular basis from background in-leakage, routine venting of UF_6 cylinders, and purging of UF_6 lines.

Each Plant Module – consisting of two Cascade Halls - is provided with a cooling water system to remove excess heat at key positions on the centrifuges in order to maintain optimum temperatures within the centrifuges.

The centrifuges are driven by a medium frequency Alternating Current (AC) supply system. A converter produces the medium frequency supply from the AC main supply using high efficiency switching devices for both run-up and continuous operation.

In addition to operating the process at subatmospheric pressure, the other primary difference between the Louisiana Energy Services, Claiborne Enrichment Center, and the NEF cascade systems is that all assay units are now identical, whereas in the Claiborne Enrichment Center, one assay unit was designed to produce low assays - in the region of 2.5%. An additional change is the increase from seven cascades per cascade hall to eight cascades per cascade hall. Maximum cascade hall capacity has been increased to 545,000 SWU/yr.

1.2.3 Comparison of the NEF Design to the LES Claiborne Enrichment Center Design

While the design of the NEF is fundamentally the same as the Claiborne Enrichment Center design reviewed and approved by the NRC in the 1990s (NRC, 1994a), a number of improvements or enhancements have been made in the current design from an environmental and safety perspective. One of these changes is the increase from seven cascades per Assay Unit to eight cascades per Assay Unit. Maximum Assay Unit capacity has been increased from 280,000 SWU/yr to 545,000 SWU/yr.

There are two important differences in the UF_6 Feed System for the NEF as compared to the Claiborne Enrichment Center. First, the liquid UF_6 phase above atmospheric pressure has been eliminated. Sublimation from the solid phase directly to the gaseous phase below atmospheric pressure is the process to be used in the NEF. A sealed autoclave is replaced with a Solid Feed Station enclosure for heating the feed cylinder. A second major difference is the use of chilled air, rather than chilled water, to cool the feed purification cylinder.

The NEF "Product Take-Off System" uses a process similar to the Claiborne Enrichment Center, but there are certain differences. In the current system proposed for the NEF, there is only one product pumping stage, whereas the proposed Claiborne Enrichment Center system used two pumping stages to transport the product for desublimation. In the NEF system, pressures are controlled such that desublimation cannot occur in the piping, eliminating the need for heat tracing and valve hot boxes. In the Claiborne Enrichment Center, the product cylinder stations relied on common chillers to cool the stations, the current system, however, uses a dedicated chiller for each station. The cold traps used to desublime any UF_6 in the vent gases are smaller than those of the Claiborne Enrichment Center design and each is situated on load cells to allow continuous monitoring of accumulation (LES, 1991a).

The NEF "Product Liquid Sampling System" uses a process very similar to Claiborne Enrichment Center, but will have a permanent vent system, the Blending and Sampling Vent Subsystem, rather than a mobile unit as used in Claiborne Enrichment Center (LES, 1991a).

The NEF "Product Blending System" uses a process similar to the proposed Claiborne Enrichment Center. One major difference, however, is the use of Solid Feed Stations to heat the donor cylinders in the NEF. The Claiborne Enrichment Center design required the use of autoclaves to heat the donor cylinders in the Claiborne Enrichment Center. Other differences between the two designs include the use of only four receiver stations in the NEF process versus five in the Claiborne Enrichment Center and the use of a dedicated vacuum pump/trap set in the NEF design versus a mobile set in the Claiborne Enrichment Center (LES, 1991a).

The NEF "Tails Take-Off System" uses a process similar to that proposed for the Claiborne Enrichment Center, but there are certain differences. In the NEF system there is only one tails pumping stage, whereas the Claiborne Enrichment Center would have used two pumping stages to transport the tails for desublimation. UF_6 tails are desublimed in cylinders cooled with chilled air in the current system, the Claiborne Enrichment Center would have used chilled water to cool the cylinders. The Claiborne Enrichment Center design called for a total of ten UBCs in five double cooling stations for each Separation Plant Module (two Cascade Halls), but the NEF current system uses ten cylinders in single cooling stations for each Cascade Hall. Finally, the current system has a dedicated vacuum pump/trap set for venting and does not use the Feed Purification System like the Claiborne Enrichment Center (LES, 1991a).

The major structures and areas of the NEF are described below and shown in Figure 1.2-4, NEF Buildings.

The Security Building serves as the primary access control point for the facility. It also contains the necessary space and provisions for an alternate Emergency Operations Center (EOC) should the primary facility become unusable.

The Separations Building houses three, essentially identical, plant process units. Each Separations Building Module is comprised of a UF_6 Handling Area, two Cascade Halls, and a Process Services Area. UF_6 is fed into the Cascade Halls and enriched UF_6 and depleted UF_6 are removed. The Cylinder Receipt and Dispatch Building (CRDB) is located between Separations Building Modules.

The Centrifuge Assembly Building (CAB) is used to assemble centrifuges before the centrifuges are moved to the Separations Building and installed in the cascades.

The Technical Services Building (TSB) contains various laboratories and maintenance facilities necessary to safely operate and maintain the facility. The TSB also includes a Medical Room and the Control Room. In an emergency, the Control Room serves as the primary Emergency Operations Center (EOC) for the facility. Most site infrastructure facilities (i.e., laboratories for sample analysis) are located in the TSB.

- Nine site groundwater exploration borings (B-1 through B-9)
- Five geotechnical borings (B-1 through B-5).

Other borings depicted on Figure 3.3-5, not on the NEF site, were performed by others.

The Southeast New Mexico-West Texas area presently is structurally stable. The Permian Basin has subsided slightly since the Laramide Orogeny. This is believed to be a result of dissolution of the Permian evaporite layers by groundwater infiltration and possibly from oil and gas extraction (WBG, 1998).

The NEF site lies within the Landreth-Monument Draw Watershed. Site drainage is to the southwest with runoff not able to reach any water body before it evaporates. The only major regional drainage feature is Monument Draw, which is located just over 4 km (2.5 mi) west of the site, between the proposed NEF site and the city of Eunice, New Mexico (USDA, 1974). The draw begins with a southeasterly course to a point north of Eunice where it turns south and becomes a well defined cut approximately 9 m (30 ft) in depth and 550 to 610 m (1,800 to 2,000 ft) in width. The draw does not have through-going drainage and is partially filled with dune sand and alluvium.

Along Red Bed Ridge (TTU, 2000), approximately 1.6 km (1 mi) northeast of the NEF site is Baker Spring (Figure 3.3-5, Site Boring Plan and Profile). The depression contains water only intermittently (see ER Section 3.4.1.1, Major Surface and Subsurface Hydrological Systems). No defined drainage features are present at the site. Rainfall on the site will be collected in detention/retention basins. Rainfall that is not collected is expected to infiltrate, or evaporate without creating any runoff that flows beyond site boundaries.

Within Lea County, New Mexico and Andrews County, Texas there are water-bearing strata used for water production. North and east of the NEF site, beneath the High Plains, the Ogallala Aquifer is the most productive of these regional aquifers. West of the site, in the alluvial deposits of Monument Draw, subsurface flow is also locally used as a minor aquifer. Lastly, the Santa Rosa Formation of the Lower Dockum Group and sandy lenses in the Upper Dockum Chinle formation are occasionally used as aquifers on a regional basis.

The most shallow strata to produce measurable quantities of water is an undifferentiated siltstone seam of the Chinle encountered at approximately 65 to 68 m (214 to 222 ft) below ground surface (WBG, 1998). There is also a 30.5-meter (100-foot) thick water-bearing sandstone layer at about 183 m (600 ft) below ground surface. However, the uppermost aquifer capable of producing significant volumes of water is the Santa Rosa Formation located approximately 340 m (1,115 ft) below ground surface (CJI, 2004).

With respect to the environment, geologic conditions at the NEF site will not be significantly affected by construction or operation of the NEF. (See ER Section 4.3, Geology and Soils Impact.)

3.3.1 Stratigraphy and Structures

The Permian Basin, a massive subsurface bedrock structure, is a downward flexure of a large thickness of originally flat-lying, bedded, sedimentary rock. It dominates the geologic structure of the region. It extends to 4,880 meters (16,000 feet) below msl. The NEF site is located above the Central Basin Platform that divides the Permian Basin into the Midland and Delaware sub-basins, as shown in Figure 3.3-2, Regional Geology of the Permian Basin. The base of the Permian basin sediments extends about 1,525 m (5,000 ft) deep beneath the NEF site.

The top of the Permian deposits are approximately 434 m (1,425 ft) below ground surface. Overlying the Permian are the sedimentary rocks of the Triassic Age Dockum Group. The upper formation of the Dockum Group is the Chinle. Locally, the Chinle Formation consists of red, purple and greenish micaceous claystone and siltstone with interbedded fine-grained sandstone. The Chinle is regionally extensive with outcrops as far away as the Grand Canyon region in Arizona (WBG, 1998). Locally overlying the Chinle Formation in the Permian Basin is either the Tertiary Ogallala, Gatuña or Antlers Formations, or Quaternary alluvium. The Tertiary Ogallala Formation underlies all of the High Plains (to the east) and mantles several ridges in Lea County. Unconsolidated sediments northeast of the NEF site are recognized as the Ogallala and deposits west of the NEF site are mapped as the Gatuña or Antlers Formations. This sediment is described as alluvium (WBG, 1998) and is mined as sand and gravel in the NEF site area.

As shown in Table 3.3-1, Geological Units Exposed At, Near, or Underlying the Site, the uppermost 340 m (1,115 ft) of the subsurface in the NEF site vicinity can include up to 0.6 m (2 ft) of silty fine sand, about 3 m (10 ft) of dune sand, 6 m (20 ft) of caliche, and 16 m (54 ft) of alluvium overlying the Chinle Formation of the Triassic Age Dockum Group. The Chinle Formation is predominately red to purple moderately indurated claystone, which is highly impermeable (WBG, 1998). Red Bed Ridge is a significant topographic feature in this regional plain that is just north and northeast of the NEF site, and is capped by relatively resistant caliche. Ground surface elevation increases about 15 m (50 ft) from +1,045 m (+3,430 ft) to +1,059 m (+3,475 ft) across the ridge.

Recent deposits at the site and in the site area are primarily dune sands derived from Permian and Triassic rocks of the Permian Basin. These so-called Mescalero Sands cover approximately 80% of Lea County, locally as active sand dunes.

Information from recent borings done on the NEF site is consistent with the data shown on the profile in Figure 3.3-5, Site Boring Plan and Profile. This includes a thin layer of loose sand at the surface; about 12 m (40 ft) of high blow count alluvial silty sand and sand and gravel locally cemented with caliche; and the Chinle clay at a depth of about 12 m (40 ft) below the ground surface. No sandy clay layers were reported in the clay.

The boring logs for the NEF site geotechnical borings (Borings B-1 through B-5) are provided in the Safety Analysis Report (SAR) Figures 3.2-10 through 3.2-15.

Two types of faulting were associated with early Permian deformation. Most of the faults were long, high-angle reverse faults with well over a hundred meters (several hundred feet) of vertical displacement that often involved the Precambrian basement rocks. The second type of faulting is found along the western margin of the platform where long strike-slip faults, with displacements of tens of kilometers (miles), are found. The closest fault to the site as defined by the New Mexico Bureau of Geology and Mineral Resources (NMIMT, 2003) is over 161 km (100 mi) to the west and is associated with the deeper portions of the Permian Basin (Machette, 1998).

The large structural features of the Permian Basin are reflected only indirectly in the Mesozoic and Cenozoic rocks, as there has been virtually no tectonic movement within the basin since the Permian period. Figure 3.3-2, Regional Geology of the Permian Basin, shows the structure that

- siltstones and sandstone layers found at various depths with varying thicknesses

The depth to the top of the red beds in borings done for engineering purposes ranged from about 3.6 to 9.1 m (12 to 30 ft).

The dry density of the clay ranges from 1.86 to 2.32 g/cm^3 (116 to 145 lbs/ft^3), averaging 2.11 g/cm^3 (132 lbs/ft^3). The red, reddish-brown or purple silty clays range in moisture content from 2.5% to 25%, averaging 8% to 12% for most samples. Liquid limits for the clays range from 35% to 55% with plasticity indices ranging from 24 to 38. Percent passing the #200 sieve for the clays ranges from 87% to 99.8%.

Permeabilities were measured for the reddish brown silty clays, sandstones and siltstones. Ranges were determined as shown in Table 3.3-2, Measured Permeabilities Near the NEF Site. The values for the clay indicate that it is highly impervious. Siltstones are slightly more permeable, but still having relatively poor permeability.

Unconfined compressive tests on the clay resulted in values from 136,000 kg/m^2 to 485,000 kg/m^2 (13.9 to 49.7 tons/ft^2) with an average value of 293,000 kg/m^2 (30 tons/ft^2).

Given a depth to groundwater of at least 65 to 68 m (214 to 222 ft), there is no potential for liquefaction at the site.

A geotechnical investigation of the site conducted in September 2003 consisted of 5 widely-spaced test borings that extended to depths of about 12 to 30.5 m (40 to 100 ft) using a hollow-stem auger and split-spoon sampling. Based on the boring results, up to 0.6 m (2 ft) of loose eolian sand underlain by dense to very dense, fine- to medium-grained sand and silty sand of the Gatuña/Antlers Formation was encountered. These sands are locally cemented with caliche deposits. Beneath the Gatuña/Antlers Formation is the Chinle claystone, a very hard highly plastic clay, which was encountered at depths of about 10.7 to 12.2 m (35 to 40 ft). One boring extended to 30.5 m (100 ft) deep and ended in the Chinle Formation. Blow-count N-values for about the top 7.6 m (25 ft) of sand and gravel ranged from about 20 to 76. Beneath that horizon the unit becomes denser or contains gravel to the extent that useful blow counts are not obtained. Where caliche cements the sand and gravel, N-values of over 60 are typical. Standard N-values were not available for samples in the underlying clay due to its hardness causing blow counts to range upwards of 100.

For samples from the shallow sand and gravel unit, California Bearing Ratio values of 10.5 and 34.4 were obtained along with a maximum dry density value of 1.97 g/cm^3 (123 lbs/ft^3). Fines in this material were generally non-plastic with 17% to 31% of samples finer than 200 sieve size. Clay samples had relatively high liquid limits of 50% to 60% and plastic limits of 18% to 23%, suggesting high silt content.

Footings bearing in the firm and dense sandy soils below the upper loose eolian soils are estimated to have an allowable bearing pressure of 34,177 kg/m^2 (7,000 lbs/ft^2).

3.3.3 Seismology

The majority of earthquakes in the United States are located in the tectonically active western portion of the country. However, areas within New Mexico and the southwestern United States also experience earthquakes, although at a lower rate and at lower intensities. Earthquakes in the region around the NEF site include: isolated and small clusters of low to moderate size events toward the Rio Grande Valley of New Mexico and in Texas, southeast of the NEF site.

3.3.3.1 Seismic History of the Region and Vicinity

The NEF site is located within the Permian Basin as shown on Figure 3.3-7, Tectonic Subdivisions of the Permian Basin (Talley, 1997). Specifically, the site is located near the northern end of the Central Basin Platform (CBP). The CBP became a distinct dividing feature within the Permian Basin as a result of Pennsylvanian and early Permian compressional stresses. This tectonism resulted in a deeper Delaware Basin to the west and shallower Midland Basin to the east of the ridge-like CBP.

The last episode of tectonic activity centered on the late Cretaceous and early Tertiary Laramide Orogeny that formed the Cordilleran Range to the west of the Permian Basin. The Permian Basin region was uplifted to its present position during this orogenic event. There has not been any further tectonic activity since the early Tertiary. Structurally, the Permian Basin has subsided slightly since the Larmaide tectonic event. Dissolution of Permian evaporate layers by groundwater infiltration or possibly from oil and gas extraction is suggested as a possible cause for this observed subsidence.

The 250-million year old Permian Basin is the source of abundant gas and oil reserves that continue to be extracted. These oil fields in southeast New Mexico are characterized as "in a mature stage of secondary recovery effort" (Talley, 1997). Water flooding began in the late 1970's followed by carbon dioxide (CO_2) flooding now being used to enhance recovery in some fields. Industry case studies describe hydraulic fracturing procedures used in the Queen and San Andres formations near the NEF site that produced fracture half-lengths from 170 to 259 m (560 to 850 ft) in these formations.

No Quaternary faults are mapped for the site locale. The nearest recent faulting is situated more than 161 km (100 mi) west of the site (Machette, 1998).

The study of historical seismicity includes earthquakes in the region of interest known from felt or damage records and from more recent instrumental records (since early 1960's). Most earthquakes in the region have left no observable surface fault rupture.

Figure 3.3-8, Seismicity Map for 322-Kilometer (200-Mile) Radius of the NEF Site indicates the location of earthquakes which have occurred within a 322 km (200 mi) radius of the NEF site with magnitude > 0). The earthquakes are also listed in Table 3.3-3, Earthquakes Within a 322 Kilometer (200 Mile) Radius of the NEF Site. Figure 3.3-9, Seismicity in the Immediate Vicinity of the NEF Site, indicates the location of earthquakes within about 97 km (60 mi) of the NEF site. Earthquakes, which have occurred within a 322 km (200 mi) radius of the NEF site with a magnitude of 3.0 and greater, are listed in Table 3.3-4, Earthquakes of Magnitude 3.0 and Greater Within 322 Kilometers (200 Mile) of the NEF Site.

The data reflected in the above figures and tables are from earthquake catalogs from the University of Texas Institute for Geophysics (UTIG, 2002), New Mexico Tech Historical Catalog (NMIMT, 2002), Advanced National Seismic System (USGS, 2003a) and the New Mexico Tech Regional Catalog, exclusive of Socorro New Mexico events (NMIMT, 2002).

Earthquake data for a 322 km (200 mi) radius of the NEF site were acquired from public domain resources. Table 3.3-5, Earthquake Data Sources for New Mexico and West Texas, lists organizations and data sources that were identified and earthquake catalogs were obtained.

The need to level the site for construction will require some soil excavation as well as soil fill. Fill placed on the site will provide the same characteristics as the existing natural soils thus providing the same runoff characteristics as currently exist due to the presence of natural soils on the site.

During operation, the NEF's stormwater runoff detention/retention system will provide a means to allow controlled release of site runoff from the Site Stormwater Detention Basin only. Stormwater discharge will be periodically monitored in accordance with state and/or federal permits. This system will also be used for routine sampling of runoff as described in ER Section 6.1.1.2, Liquid Effluent Monitoring. A Spill Prevention Control and Countermeasure (SPCC) plan will be implemented for the facility to identify potential spill substances, sources and responsibilities. A SWPP will also be implemented for the NEF to assure that runoff released to the environment will be of suitable quality. These plans are described in ER Section 4.1, Land Use Impacts.

Water discharged to the NEF site septic systems will meet required levels for all contaminants stipulated in any permit or license required for that activity, including the 10 CFR 20 (CFR, 2003q) and a Groundwater Discharge Permit/Plan. The facility's Liquid Effluent Collection and Treatment System provides a means to control liquid waste within the plant. The system provides for collection, treatment, analysis, and processing of liquid wastes for disposal. Effluents unsuitable for release to the Treated Effluent Evaporative Basin are processed onsite or disposed of offsite in a suitable manner in conformance with U.S. EPA and State of New Mexico regulatory requirements. The State of New Mexico has adopted the U.S. EPA hazardous water regulations (40 CFR Parts 260 through 266, 268 and 270) (CFR, 2003cc; CFR, 2003p; CFR, 2003dd; CFR, 2003ee; CFR, 2003v; CFR, 2003ff; CFR, 2003gg; CFR, 2003hh; CFR, 2003ii) governing the generation, handling, storage, transportation, and disposal of hazardous materials. These regulations are found in 20.4.I NMAC, "Hazardous Waste Management" (NMAC, 2000).

The UBC Storage Pad Stormwater Retention Basin, which exclusively serves the UBC Storage Pad and cooling tower blowdown water discharges, is lined to prevent infiltration. It is designed to retain a volume slightly more than twice that for the 24-hour, 100-year frequency storm plus an allowance for cooling tower blowdown. Designed for sampling and radiological testing of the contained water and sediment, this basin has no flow outlet. All discharge is through evaporation.

The Site Stormwater Detention Basin is designed with an outlet structure for drainage. Local terrain serves as the receiving area for this basin. During a rainfall event larger than the design basis, the potential exists to overflow the basin if the outfall capacity is insufficient to pass beyond design basis inflows to the basin. Overflow of the basin is an unlikely event. The additional impact to the surrounding land over that which would occur during such a flood alone, is assumed to be small. Therefore, potential overflow of the Site Stormwater Detention Basin during an event beyond its design basis is expected to have a minimal impact to surrounding land. The Site Stormwater Detention Basin will also receive runoff from a portion of the site stormwater diversion ditch. The purpose of the diversion ditch is to safely divert surface runoff from the area upstream of the NEF around the east and west sides of the NEF structures during extreme precipitation events. There is no retention or attenuation of flow associated with this feature. The east side will divert surface runoff into the Site Stormwater Detention Basin. The basin is designed to provide no flow attenuation for this component of flow The west side will divert surface runoff around the site where it will continue on as overland flow. Since there are no modifications or attenuation of flows, there are no adverse impacts and no mitigative measures are required.

Discharge of operations-generated potentially contaminated waste water is made exclusively to the Treated Effluent Evaporative Basin. Only liquids meeting site administrative limits (based on prescribed standards) are discharged to this basin. The basin is double-lined with leak detection and open to allow evaporation.

Mitigation measures will be in place to minimize potential impact on water resources. These include employing BMPs and the control of hazardous materials and fuels. In addition, the following controls will also be implemented:

- Construction equipment will be in good repair without visible leaks of oil, greases, or hydraulic fluids.
- The control of spills during construction will be in conformance with Spill Prevention Control and Countermeasures (SPCC) plan.
- Use of the BMPs will assure stormwater runoff related to these activities will not release runoff into nearby sensitive areas (EPA, 2003g). See ER Sections 4.1.1 and 4.2.5 for construction BMPs.
- BMPs will also be used for dust control associated with excavation and fill operations during construction. Water conservation will be considered when deciding how often dust suppression sprays will be applied (EPA, 2003g).
- Silt fencing and/or sediment traps will be used.
- External vehicle washing (no detergents, water only).
- Stone construction pads will be placed at entrance/exits if unpaved construction access adjoins a state road.
- All temporary construction and permanent basins are arranged to provide for the prompt, systematic sampling of runoff in the event of any special needs.
- Water quality impacts will be controlled during construction by compliance with the National Pollution Discharge Elimination System – General Permit requirements and by applying BMPs as detailed in the site Stormwater Pollution Prevention (SWPP) plan.
- A Spill Prevention Control and Countermeasure Plan (SPCC), will be implemented for the facility to identify potential spill substances, sources and responsibilities.
- All above-ground diesel storage tanks will be bermed.
- Any hazardous materials will be handled by approved methods and shipped offsite to approved disposal sites. Sanitary wastes generated during site construction will be handled by portable systems, until such time that plant sanitary facilities are available for site use. An adequate number of these portables systems will be provided.
- The NEF Liquid Effluent Collection and Treatment System provides a means to control liquid waste within the plant including the collection, analysis, and processing of liquid wastes for disposal.
- Control of surface water runoff will be required for activities covered by the EPA Region 6 NPDES Construction General Permit.

Collected waste such as trash, compressible dry waste, scrap metals, and other candidate wastes will be volume reduced at a centralized waste processing facility. This facility could be operated by a commercial vendor such as GTS Duratek. This facility would further reduce generated waste to a minimum quantity prior to final disposal at a land disposal facility or potential reuse.

4.13.4.1 Control and Conservation

The features and systems described below serve to limit, collect, confine, and treat wastes and effluents that result from the UF_6 enrichment process. A number of chemicals and processes are used in fulfilling these functions. As with any chemical/industrial facility, a wide variety of waste types will be produced. Waste and effluent control is addressed below as well as the features and systems used to conserve resources.

4.13.4.1.1 Mitigating Effluent Releases

The equipment and design features incorporated in the NEF are selected to keep the release of gaseous and liquid effluent contaminants as low as practicable, and within regulatory limits. They are also selected to minimize the use of depletable resources. Equipment and design features for limiting effluent releases during normal operation are described below:

The process systems that handle UF_6 operate almost entirely at sub-atmospheric pressures. Such operation results in no outward leakage of UF_6 to any effluent stream.

- The one location where UF_6 pressure is raised above atmospheric pressure is in the piping and cylinders inside the sampling autoclave. The piping and cylinders inside the autoclave confine the UF_6. In the event of leakage, the sampling autoclave provides secondary containment of UF_6.
- Cylinders of UF_6 are transported only when cool and when the UF_6 is in solid form. This minimizes risk of inadvertent releases due to mishandling.
- Process off-gas, from UF_6 purification and other operations, is discharged through desublimers to solidify and reclaim as much UF_6 as possible. Remaining gases are discharged through high-efficiency filters and chemical adsorbent beds. The filters and adsorbents remove HF and uranium compounds left in the gaseous effluent stream.
- Liquids and solids in the process systems collect uranium compounds. When these liquids and solids (e.g., oils, damaged piping, or equipment) are removed for cleaning or maintenance, portions end up in wastes and effluent. Different processes are employed to separate uranium compounds and other materials (such as various heavy metals) from the resulting wastes and effluent. These processes are described in ER Section 4.13.4.2 below.
- Processes used to clean up wastes and effluent create their own wastes and effluent as well. Control of these is also accomplished by liquid and solid waste handling systems and techniques, which are described in detail in the Sections below. In general, careful applications of basic principles for waste handling are followed in all of the systems and processes. Different waste types are collected in separate containers to minimize contamination of one waste type with another. Materials that can cause airborne contamination are carefully packaged; ventilation and filtration of the air in the area is provided as necessary. Liquid wastes are confined to piping, tanks, and other containers;

curbing, pits, and sumps are used to collect and contain leaks and spills. Hazardous wastes are stored in designated areas in carefully labeled containers; mixed wastes are also contained and stored separately. Strong acids and caustics are neutralized before entering an effluent stream. Radioactively contaminated wastes are decontaminated insofar as possible to reduce waste volume.

- Following handling and treatment processes to limit wastes and effluent, sampling and monitoring is performed to assure regulatory and administrative limits are met. Gaseous effluent is monitored for HF and is sampled for radioactive contamination before release; liquid effluent is sampled and/or monitored in liquid waste systems; solid wastes are sampled and/or monitored prior to offsite treatment and disposal. Samples are returned to their source where feasible to minimize input to waste streams.

4.13.4.1.2 Conserving Depletable Resources

The NEF design serves to minimize the use of depletable resources. Water is the primary depletable resource used at the facility. Electric power usage also depletes fuel sources used in the production of the power. Other depletable resources are used only in small quantities. Chemical usage is minimized not only to conserve resources, but also to preclude excessive waste production. Recyclable materials are used and recycled wherever practicable.

The main feature incorporated in the NEF to limit water consumption is the use of closed-loop cooling systems.

The NEF is designed to minimize the usage of natural and depletable resources as shown by the following measures:

- The use of low-water consumption landscaping versus conventional landscaping reduces water usage.
- The installation of low flow toilets, sinks and showers reduces water usage when compared to standard flow fixtures.
- Localized floor washing using mops and self-contained cleaning machines reduces water usage compared to conventional washing with a hose twice per week.
- The use of high efficiency washing machines compared to standard machines reduces water usage.
- The use of high efficiency closed cell cooling towers (water/air cooling) versus open cell design reduces water usage.
- Closed-loop cooling systems have been incorporated to reduce water usage.

Power usage is minimized by efficient design of lighting systems, selection of high-efficiency motors, use of appropriate building insulation materials, and other good engineering practices. The demand for power in the process systems is a major portion of plant operating cost; efficient design of components is incorporated throughout process systems.

4.13.4.1.3 Prevention and Control of Oil Spills

The NEF will implement a spill control program for accidental oil spills. The purpose of the spill control program will be to reduce the potential for the occurrence of spills, reduce the risk of

5.2.11 Environmental Justice

No environmental justice mitigation measures are anticipated.

5.2.12 Public and Occupational Health

This section describes the mitigation measures to minimize public and occupational health impacts, from both nonradiological and radiological sources.

5.2.12.1 Nonradiological – Normal Operations

Mitigation measures will be in place to minimize the impact of nonradiological gaseous and liquid effluents to well below regulatory limits. The plant design incorporates numerous features to minimize potential gaseous and liquid effluent impacts including:

- Process systems that handle UF_6 operate at sub-atmospheric pressure minimizes outward leakage of UF_6.
- UF_6 cylinders are moved only when cool and when UF_6 is in solid form minimizing the risk of inadvertent release due to mishandling.
- Process off-gas from UF_6 purification and other operations passes through cold traps to solidify and reclaim as much UF_6 as possible. Remaining gases pass through high-efficiency filters and chemical absorbers removing HF and uranic compounds.
- Waste generated by decontamination of equipment and systems are subjected to processes that separate uranic compounds and various other heavy metals in the waste material.
- Liquid and solid waste handling systems and techniques are used to control wastes and effluent concentrations.
- Gaseous effluent passes through pre-filters, high efficiency particulate air (HEPA) filters, and activated carbon filters, all of which reduce the radioactivity in the final discharged effluent to very low concentrations.
- Liquid waste is routed to collection tanks, and treated through a combination of precipitation, evaporation, and ion exchange to remove most of the radioactive material prior to release of waste water to the onsite Treated Effluent Evaporative Basin (double-lined with leak detection).
- Liquid effluent pathways are monitored and sampled to assure compliance with regulatory discharge limits.
- All UF_6 process systems are monitored by instrumentation, which will activate alarms in the Control Room and will either automatically shut down the plant to a safe condition or alert operators to take the appropriate action (i.e., to prevent release) in the event of operational problems.
- LES will investigate alternative solvents or will apply control technologies for methylene chloride solvent use.

Administrative controls, practices, and procedures are used to assure compliance with the NEFs' Health, Safety, and Environmental Program. This program is designed to ensure safe storage, use, and handling of chemicals to minimize the potential for worker exposure.

5.2.12.2 Radiological – Normal Operations

Mitigation measures to minimize the impact of radiological gaseous and liquid effluents are the same as those listed in ER Section 5.2.12.1, Nonradiological – Normal Operations. Additional measures to minimize radiological exposure and release are listed below.

Radiological practices and procedures are in place to ensure compliance with the NEFs' Radiation Protection Program. This program is designed to achieve and maintain radiological exposure to levels that are "As Low as Reasonably Achievable" (ALARA). These measures include:

- Routine plant radiation and radiological surveys to characterize and minimize potential radiological dose/exposure.
- Monitoring of all radiation workers via the use of dosimeters and area air sampling to ensure that radiological doses remain within regulatory limits and are ALARA.
- Radiation monitors are provided in the gaseous effluent stacks to detect and alarm, and affect the automatic safe shutdown of process equipment in the event contaminants are detected in the system exhaust. Systems will either automatically shut down, switch trains or rely on operator actions to mitigate the potential release.

5.2.12.3 Accidental Releases

Text removed under 10 CFR 2.390.

5.2.13 Waste Management

Mitigation measures will be in place to minimize both the generation and impact of facility wastes. Solid and liquid wastes and liquid and gaseous effluents will be controlled in accordance with regulatory limits. Mitigation measures include:

- System design features are in place to minimize the generation of solid waste, liquid waste, liquid effluents, and gaseous effluent. Liquid and gaseous effluent design features were previously described in ER Section 5.2.12, Public and Occupational Health.

6.0 ENVIRONMENTAL MEASUREMENTS AND MONITORING PROGRAMS

6.1 RADIOLOGICAL MONITORING

6.1.1 Effluent Monitoring Program

The Nuclear Regulatory Commission (NRC) requires, pursuant to 10 CFR 20 (CFR, 2003q) that licensees conduct surveys necessary to demonstrate compliance with these regulations and to demonstrate that the amount of radioactive material present in effluent from the facility has been kept as low as reasonably achievable (ALARA). In addition, the NRC requires pursuant to 10 CFR 70 (CFR, 2003b), that licensees submit semiannual reports, specifying the quantities of the principal radionuclides released to unrestricted areas and other information needed to estimate the annual radiation dose to the public from effluent discharges. The NRC has also issued Regulatory Guide 4.15 – Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment (NRC, 1979) and Regulatory Guide 4.16 – Monitoring and Reporting Radioactivity in Releases of Radioactive Materials in Liquid and Gaseous Effluent from Nuclear Fuel Processing and Fabrication Plants and Uranium Hexafluoride Production Plants (NRC, 1985) that reiterate that concentrations of hazardous materials in effluent must be controlled and that licensees must adhere to the ALARA principal such that there is no undue risk to the public health and safety at or beyond the site boundary.

Refer to Figure 6.1-1, Effluent Release Points and Meteorological Tower, and Figure 6.1-2, Modified Site Features With Proposed Sampling Stations and Monitoring Locations. Effluents are sampled as shown in Table 6.1-1, Effluent Sampling Program. For gaseous effluents, continuous air sampler filters are analyzed for gross alpha and beta each week. The filters are composited quarterly and an isotopic analysis is performed. For liquids, a grab sample is taken for isotopic analysis post-treatment prior to discharge to the Treated Effluent Evaporative Basin.

Public exposure to radiation from routine operations at the National Enrichment Facility (NEF) may occur as the result of discharge of liquid and gaseous effluents, including controlled releases from the uranium enrichment process lines during decontamination and maintenance of equipment. In addition, radiation exposure to the public may result from the transportation and storage of uranium hexafluoride (UF_6) feed cylinders, product cylinders, and Uranium Byproduct Cylinders (UBCs). Of these potential pathways, discharge of gaseous effluent has the highest possibility of introducing facility-related uranium into the environment. The plant's procedures and facilities for solid waste and liquid effluent handling, storage and monitoring result in safe storage and timely disposition of the material. ER Section 1.3, Applicable Regulatory Requirements and Required Consultations, accurately describes all applicable Federal and New Mexico State standards for discharges, as well as required permits issued by local, New Mexico and Federal governments.

Compliance with 10 CFR 20.1301 (CFR, 2003q) is demonstrated using a calculation of the total effective dose equivalent (TEDE) to the individual who is likely to receive the highest dose in accordance with 10 CFR 20.1302(b)(1) (CFR, 2003q). The determination of the TEDE by pathway analysis is supported by appropriate models, codes, and assumptions that accurately represent the facility, site, and the surrounding area. The assumptions are reasonably conservative, input data is accurate, and all applicable pathways are considered. ER Section 4.12, Public and Occupational Health Impacts, presents the details of these determinations.

The computer codes used to calculate dose associated with potential gaseous and liquid effluent from the plant follow the methodology, for pathway modeling, described in Regulatory Guide 1.109 (NRC, 1977c), and have undergone validation and verification. The dose conversion factors used are those presented in Federal Guidance Reports Numbers 11 (EPA, 1988) and 12 (EPA, 1993a).

Administrative action levels are established for effluent samples and monitoring instrumentation as an additional step in the effluent control process. All action levels are sufficiently low so as to permit implementation of corrective actions before regulatory limits are exceeded. Effluent samples that exceed the action level are cause for an investigation into the source of elevated radioactivity. Radiological analyses will be performed more frequently on ventilation air filters if there is a significant increase in gross radioactivity or when a process change or other circumstances cause significant changes in radioactivity concentrations. Additional corrective actions will be implemented based on the level, automatic shutdown programming, and operating procedures to be developed in the detailed alarm design. Under routine operating conditions, radioactive material in effluent discharged from the facility complies with regulatory release criteria.

Compliance is demonstrated through effluent and environmental sampling data. If an accidental release of uranium should occur, then routine operational effluent data and environmental data will be used to assess the extent of the release. Processes are designed to include, when practical, provision for automatic shutdown in the event action levels are exceeded. Appropriate action levels and actions to be taken are specified for liquid effluents and gaseous releases. Data analysis methods and criteria used in evaluating and reporting environmental sample results are appropriate and will indicate when an action level is being approached in time to take corrective actions.

The effluent monitoring program falls under the oversight of the NEF Quality Assurance (QA) program. Therefore, it is subject to periodic audits conducted by the facility QA personnel. Written procedures will be in place to ensure the collection of representative samples, use of appropriate sampling methods and equipment, proper locations for sampling points, and proper handling, storage, transport, and analyses of effluent samples. In addition, the plant's written procedures also ensure that sampling and measuring equipment, including ancillary equipment such as airflow meters, are properly maintained and calibrated at regular intervals. Moreover, the effluent monitoring program procedures include functional testing and routine checks to demonstrate that monitoring and measuring instruments are in working condition. Employees involved in implementation of this program are trained in the program procedures.

The NEF will ensure that isokinetic sampling conditions are maintained in all instances where pitot probes are used to sample for particulates within ducts with moving air streams. This will be accomplished by implementing the following criteria, where practical: 1) calibrating air sampling equipment so that the air velocity in the sampling probe is made equivalent to the air stream velocity in the duct being sampled; 2) maintaining the axis of the sampling probe head parallel to the air stream flow lines in the ductwork; 3) sampling (if possible) at least ten duct diameters downstream from a bend or obstruction in the duct; and 4) using shrouded-head air sampling probes when they are available in the size appropriate to the air sampling situation. Particle size distributions will be determined from process knowledge or measured to estimate and compensate for sample line losses and momentary non-isokinetic conditions.

The NEF will ensure that sampling equipment (pumps, pressure gages and air flow calibrators) are calibrated by qualified individuals. All air flow and pressure drop calibration devices (e.g., rotometers) will be calibrated periodically using primary or secondary air flow calibrators (wet test meters, dry gas meters or displacement bellows). Secondary air flow calibrators will be calibrated annually by the manufacturer(s). Air sampling train flow rates will be verified and/or calibrated with tertiary air flow calibrators (rotometers) each time a filter is replaced or a sampling train component is replaced or modified. Sampling equipment and lines will be inspected for defects, obstructions and cleanliness. Calibration intervals will be developed based on manufacturer's recommendations and nuclear industry operating experience.

6.1.1.1 Gaseous Effluent Monitoring

As a matter of compliance with regulatory requirements, all potentially radioactive effluent from the facility is discharged only through monitored pathways. See ER Section 4.12.2.1, Routine Gaseous Effluent, for a discussion of pathway assessment. The effluent sampling program for the NEF is designed to determine the quantities and concentrations of radionuclides discharged to the environment. The uranium isotopes ^{238}U, ^{236}U, ^{235}U and ^{234}U are expected to be the prominent radionuclides in the gaseous effluent. The annual uranium source term for routine gaseous effluent releases from the plant has been conservatively assumed to be 8.9 MBq (240 μCi) per year, which is equal to twice the source term applied to the 1.5 million SWU plant described in NUREG-1484 (NRC, 1994a). This is a very conservative annual release estimate used for bounding analyses. Additional details regarding source term are provided in ER Section 4.12, Public and Occupational Health Impacts. Representative samples are collected from each release point of the facility. Because uranium in gaseous effluent may exist in a variety of compounds (e.g., depleted hexavalent uranium, triuranium octoxide, and uranyl fluoride), effluent data will be maintained, reviewed, and assessed by the facility's Radiation Protection Manager, to assure that gaseous effluent discharges comply with regulatory release criteria for uranium. Table 6.1-1, Effluent Sampling Program, presents an overview of the effluent sampling program.

The gaseous effluent monitoring program for the NEF is designed to determine the quantities and concentrations of gaseous discharges to the environment.

Gaseous effluent from the NEF, which has the potential for airborne radioactivity (albeit in very low concentrations) will be discharged through the Separations Building Gaseous Effluent Vent System (GEVS), the Technical Services Building (TSB) GEVS, the Centrifuge Test and Post Mortem Facilities Exhaust Filtration System, and portions of the TSB Heating Ventilating and Air Conditioning (HVAC) System that provide the confinement ventilation function for areas of the TSB with the potential for contamination (Decontamination Workshop, Cylinder Preparation Room and the Ventilated Room). Monitoring for each of these systems is as follows:

- Separations Building GEVS: This system discharges to a stack on the TSB roof. The Separations Building GEVS provides for continuous monitoring and periodic sampling of the gaseous effluent in the exhaust stack in accordance with the guidance in NRC Regulatory Guide 4.16 (NRC, 1985). The GEVS stack sampling system provides the required samples. The exhaust stack is equipped with monitors for alpha radiation and HF.

- TSB GEVS: This system discharges to an exhaust stack on the TSB roof. The TSB GEVS provides for continuous monitoring and periodic sampling of the gaseous effluent in the exhaust stack in accordance with the guidance in NRC Regulatory Guide 4.16 (NRC, 1985). The TSB GEVS stack sampling system provides the required samples. The exhaust stack contains monitors for alpha radiation and HF.
- The Centrifuge Test and Post Mortem Facilities Exhaust Filtration System: This system discharges through a stack on the Centrifuge Assembly Building (CAB). The Centrifuge Test and Post Mortem Facilities Exhaust Filtration stack sampling system provides for continuous monitoring and periodic sampling of the gaseous effluent in the exhaust stack in accordance with the guidance in NRC Regulatory Guide 4.16 (NRC, 1985). The exhaust stack is provided with an alpha radiation monitor and an HF monitor.
- TSB HVAC System (confinement ventilation function portions): This system maintains the room temperature in various areas of the TSB, including some potentially contaminated areas. For the potentially contaminated areas (Ventilated Room, Decontamination Workshop and Cylinder Preparation Room), the confinement ventilation function of the TSB HVAC system maintains a negative pressure in these rooms and discharges the gaseous effluent to an exhaust stack on the TSB roof. The stack sampling system provides for continuous monitoring and periodic sampling of the gaseous effluent from the rooms served by the TSB HVAC confinement ventilation function in accordance with the guidance in NRC Regulatory Guide 4.16 (NRC, 1985).

The gaseous effluent sampling program supports the determination of quantity and concentration of radionuclides discharged from the facility and supports the collection of other information required in reports to be submitted to the NRC. A minimum detectable concentration (MDC) of at least 3.7×10^{-11} Bq/ml (1.0×10^{-15} µCi/ml) is a program requirement (NRC, 2002b) for all gross alpha analyses performed on gaseous effluent samples. That MDC value represents <2% of the limit for any uranium isotope. Table 6.1-2, Required Lower Level of Detection for Effluent Sample Analyses, summarizes detection requirements for effluent sample analyses.

6.1.1.2 Liquid Effluent Monitoring

Liquid effluents containing low concentrations of radioactive material, consisting mainly of spent decontamination solutions, floor washings, liquid from the laundry, and evaporator flushes, is expected to be generated by the NEF. Table 6.1-3, Estimated Uranium in Pre-Treated Liquid Waste from Various Sources, provides estimates of the annual volume and radioactive material content in liquid effluent by source prior to processing. Uranium is the only radioactive material expected in these wastes. Potentially contaminated liquid effluent is routed to the Liquid Effluent Collection and Treatment System for treatment. Most of the radioactive material is removed from waste water in the Liquid Effluent Collection and Treatment System through a combination of clean-up processes that includes precipitation, evaporation, and ion exchange. Post-treatment liquid waste water is sampled and undergoes isotopic analysis prior to discharge to assure that the released concentrations are well below the concentration limits established in Table 3 of Appendix B to 10 CFR 20 (CFR, 2003q).

After treatment, the effluent is released to the double-lined Treated Effluent Evaporative Basin, which includes leak detection monitoring. Concentrated radioactive solids generated by the liquid treatment processes at the facility are handled and disposed of as low-level radioactive waste.

The design basis uranium source term for routine liquid effluent discharge to the Treated Effluent Evaporative Basin has been conservatively estimated to be 14.4 MBq (390 μCi) per year. There is no offsite release of liquid effluents to unrestricted areas. ER Section 4.12, Public and Occupational Health Impacts, provides additional details regarding effluent source terms.

Representative sampling is required for all batch liquid effluent releases. Liquid samples are collected from each liquid batch and analyzed prior to any transfer. Isotopic analysis is performed prior to discharge. The MDC for analysis of liquid effluent are presented in Table 6.1-2, Required Lower Level of Detection for Effluent Sample Analyses. The liquid effluent sampling program supports the determination of quantities and concentrations of radionuclides discharged to the Treated Effluent Evaporative Basin and supports the collection of other information required in reports submitted to the NRC.

Periodic sampling of liquid effluent is required since these effluents are treated in batches. Representative sampling is assured through the use of tank agitators and recirculation lines. All collection tanks are sampled before the contents are sent through any treatment process. Treated water is collected in Monitor Tanks, which are sampled before discharge to the Treated Effluent Evaporative Basin.

NRC Information Notice 94-07 (NRC, 1994b) describes the method for determining solubility of discharged radioactive materials. Note that liquid effluents at the NEF are treated such that insoluble uranium is removed as part of the treatment process. Releases are in accordance with the ALARA principle.

General site stormwater runoff is routed to the Site Stormwater Detention Basin. The UBC Storage Pad Stormwater Retention Basin collects rainwater from the UBC Storage Pad as well as cooling tower blowdown water. Approximately 174,100 m^3 (46 million gal) of stormwater are expected to be collected each year by the two basins. Both of these basins will be included in the site Radiological Environmental Monitoring Program. See ER Section 6.1.2.

6.1.2 Radiological Environmental Monitoring Program

The Radiological Environmental Monitoring Program (REMP) at the NEF is a major part of the effluent compliance program. It provides a supplementary check of containment and effluent controls, establishes a process for collecting data for assessing radiological impacts on the environs and estimating the potential impacts on the public, and supports the demonstration of compliance with applicable radiation protection standards and guidelines.

The primary objective of the REMP is to provide verification that the operations at the facility do not result in detrimental radiological impacts on the environment. Through its implementation, the REMP provides data to confirm the effectiveness of effluent controls and the effluent monitoring program. In order to meet program objectives, representative samples from various environmental media are collected and analyzed for the presence of plant-related radioactivity. The types and frequency of sampling and analyses are summarized in Table 6.1-4, Radiological Environmental Monitoring Program. Environmental media identified for sampling consist of ambient air, groundwater, soil/sediment, and vegetation. All environmental samples will be analyzed onsite. However, samples may also be shipped to a qualified independent laboratory for analyses. The MDCs for gross alpha (assumed to be uranium) in various environmental media are shown in Table 6.1-5, Required MDC for Environmental Sample Analyses. Monitoring and sampling activities, laboratory analyses, and reporting of facility-related radioactivity in the environment will be conducted in accordance with industry-accepted and regulatory-approved methodologies.

The Quality Control (QC) procedures used by the laboratories performing the plant's REMP will be adequate to validate the analytical results and will conform with the guidance in Regulatory Guide 4.15 (NRC, 1979). These QC procedures include the use of established standards such as those provided by the National Institute of Standards and Technology (NIST), as well as standard analytical procedures such as those established by the National Environmental Laboratory Accreditation Conference (NELAC).

Monitoring procedures will employ well-known acceptable analytical methods and instrumentation. The instrument maintenance and calibration program will be appropriate to the given instrumentation, in accordance with manufacturers' recommendations.

The NEF will ensure that the onsite laboratory and any contractor laboratory used to analyze NEF samples participates in third-party laboratory intercomparison programs appropriate to the media and analytes being measured. Examples of these third-party programs are: 1) Mixed Analyte Performance Evaluation Program (MAPEP) and the DOE Quality Assurance Program (DOEQAP) that are administered by the Department of Energy; and 2) Analytics Inc, Environmental Radiochemistry Cross-Check Program. The NEF will require that all radiological and non-radiological laboratory vendors are certified by the National Environmental Laboratory Accreditation Program (NELAP) or an equivalent state laboratory accreditation agency for the analytes being tested.

Reporting procedures will comply with the requirements of 10 CFR 70.59 (CFR, 2003b) and the guidance specified in Regulatory Guide 4.16 (NRC, 1985). Reports of the concentrations of principal radionuclides released to unrestricted areas in effluents will be provided and will include the Minimum Detectable Concentration (MDC) for the analysis and the error for each data point.

The REMP includes the collection of data during pre-operational years in order to establish baseline radiological information that will be used in determining and evaluating impacts from operations at the plant on the local environment. The REMP will be initiated at least 2 years prior to plant operations in order to develop a sufficient database. The early initiation of the REMP provides assurance that a sufficient environmental baseline has been established for the plant before the arrival of the first uranium hexafluoride shipment. Radionuclides in environmental media will be identified using technically appropriate, accurate, and sensitive analytical instruments. Data collected during the operational years will be compared to the baseline generated by the pre-operational data. Such comparisons provide a means of assessing the magnitude of potential radiological impacts on members of the public and in demonstrating compliance with applicable radiation protection standards.

8.7 RADIOLOGICAL IMPACTS

The assessment of potential impacts considers the entire population surrounding the proposed NEF within a distance of 80 km (50 mi).

Radiological impacts are regulated under 10 CFR 20 (CFR, 2003q), which specifies a total effective dose equivalent (TEDE) limit for members of the public of 1 mSv/yr (100 mrem/yr) from all sources and pathways from the NEF, excluding natural background sources. In addition, 10 CFR 20.1101(d) (CFR, 2003bb) requires that constraints on atmospheric releases be established for the NEF such that no member of the public would be expected to receive a total effective dose equivalent in excess of 0.1 mSv/yr (10 mrem/yr) from these releases. Further, the NEF would be subject to the Environmental Protection Agency's (EPA) standards, including: standards contained in 40 CFR 190 (CFR, 2003f) that require that dose equivalents under routine operations not exceed 0.25 mSv (25 mrem) to the whole body, 0.75 mSv (75 mrem) to the thyroid, and 0.25 mSv (25 mrem) to any other organ from all pathways.

The general public and the environment may be impacted by radiation and radioactive material from the NEF as the result of discharges of gaseous and liquid effluent discharges, including controlled releases from the uranium enrichment process lines during decontamination and maintenance of equipment. In addition, radiation exposure to the public may result from the transportation and storage of uranium hexaflouride (UF_6) feed cylinders, UF_6 product cylinders, low-level radioactive waste, and depleted UF_6 cylinders.

Potential radiological impacts from operation of the NEF would result from controlled releases of small quantities of UF_6 during normal operations and releases of UF_6 under hypothetical accident conditions. Normal operational release rates to the atmosphere and to the onsite Treated Effluent Evaporative Basin are expected to be less than 8.9 MBq/yr (240 µCi/yr) and 2.1 MBq/yr (56 µCi/yr), respectively. The estimated maximum annual effective dose equivalent and maximum annual organ (lung) committed dose equivalents from discharged gaseous effluent to an adult located at the plant site south boundary are 1.7×10^{-4} mSv (1.7×10^{-2} mrem) and 1.4×10^{-3} mSv (1.4×10^{-1} mrem), respectively. The maximum effective dose equivalent and maximum annual organ (lung) dose equivalent from gaseous effluent to the nearest resident (teenager) located 4.3 km (2.63 mi) in the west sector are expected to be less than 1.7×10^{-5} mSv (1.7×10^{-3} mrem) and 1.2×10^{-4} mSv (1.2×10^{-2} mrem), respectively.

The estimated maximum annual effective dose equivalent and maximum annual organ (lung) committed dose equivalents from liquid effluent to an adult at the south site boundary are 1.7×10^{-5} mSv (1.7×10^{-3} mrem) and 1.5×10^{-4} mSv (1.5×10^{-2} mrem), respectively, assuming the Treated Effluent Evaporative Basin is dry only 10% of the year (i.e., resuspension of dust when dry). The estimated maximum annual effective dose equivalent and maximum annual organ (lung) committed dose equivalents from discharged liquid effluent to an individual (teenager) at the nearest residence are 1.7×10^{-6} mSv (1.7×10^{-4} mrem) and 1.3×10^{-5} mSv (1.3×10^{-3} mrem), respectively, for the same release assumptions.

The maximum annual dose equivalent due to external radiation from the UBC Storage Pad and all other feed, product and byproduct cylinders on NEF property (skyshine and direct) is estimated to be less than 2.0×10^{-1} mSv (< 20 mrem) to the maximally exposed person at the nearest point on the site boundary (2,000 hrs/yr) and 8×10^{-12} mSv (8×10^{-10} mrem) to the maximally exposed resident (8,760 hrs/yr) located 4.3 km (2.63 mi) west of NEF.

With respect to the impact from the transportation of UF_6 as feed, product or depleted material and solid low level waste, the cumulative dose impact has been found to be small. The cumulative dose equivalent to the general public from the "worst-case" combination of all transport categories combined equaled 2.33×10^{-6} person-Sv/year (2.33×10^{-4} person-rem/year). Similarly, the dose equivalent to the onlooker, drivers and workers totaled 1.05×10^{-3}, 9.49×10^{-2}, 6.98×10^{-4} person-Sv/year (1.05×10^{-1}, 9.49×10^{-2}, and 6.98×10^{-2} person-rem/year), respectively.

The dose equivalents due to normal operations are small fractions of the normal background range of 2.0 to 3.0 mSv (200 to 300 mrem) that an average individual receives in the US, and well within regulatory limits. Given the conservative assumptions used in estimating these values, these concentrations and resulting dose equivalents are insignificant, and their potential impacts on the environment and health are inconsequential.

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