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**21G-10-0165**  
**GOV-01-55**  
**ACF-10-0231**

August 18, 2010

Director  
Office of Nuclear Material Safety & Safeguards  
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555.

References: 1) Docket No. 70-143; SNM License 124

Subject: **Biannual Effluent Monitoring Report January through June 2010**

Dear Mr. Reyes:

In accordance with the requirements set forth in 10 CFR, Part 70.59, Nuclear Fuel Services, Inc. (NFS) submits the attached reports. Attachment A reports the Radioactivity in Effluent Liquid for the period January through June 2010. Attachment B reports the Radioactivity in Effluent Air for the period January through June 2010. Attachment C summarizes an evaluation of the dose and air activity concentrations for the maximally exposed offsite individual due to gaseous effluents, during the period January through June 2010.

If you or your staff have any questions, require additional information, or wish to discuss this, please contact me or Mr. Robert Holley, Environmental Safety Manager, at (423) 743-1777. Please reference our unique document identification number (21G-10-0165) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.

A handwritten signature in black ink, appearing to read 'Mark P. Elliott', is written over the printed name.

Mark P. Elliott  
Quality, Safety, & Safeguards  
Director

CJB/rrm  
Enclosure

- A- Report of Radioactivity in Effluent Liquid for the Period January - June 2010
- B- Report of Radioactivity in Effluent Air for the Period of January - June 2010
- C- Report of Gaseous Effluent Dose and Activity Concentrations for the Maximally Exposed Off-Site Individual for the Release Period January - June 2010

JE17

xc: Mr. Manuel Crespo, Project Inspector  
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Director  
Office of Nuclear Material Safety & Safeguards  
U. S. Nuclear Regulatory Commission  
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Mr. Kevin Ramsey, Project Manager  
Fuel Manufacturing Branch  
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Office of Nuclear Material Safety & Safeguards  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Mr. Galen Smith  
Senior Resident Inspector  
U. S. Nuclear Regulatory Commission

***Attachment A***  
***To Letter Dated August 18, 2010***

***Report of Radioactivity in Effluent Liquid for the Period***  
***January – June 2010***

**(Two Pages to Follow)**

## Radioactivity in Effluent Liquid January 1, 2010 to June 30, 2010

| Location          | Total Volume (l) | Activity Concentration ( $\mu\text{Ci/ml}$ ) | Error Estimate ( $\mu\text{Ci/ml}$ ) | LLD ( $\mu\text{Ci/ml}$ ) | Quantity Released (Ci) | Quantity Released (g) | Fraction of ECV <sup>1</sup> |
|-------------------|------------------|--|--------------------------------------|---------------------------|------------------------|-----------------------|------------------------------|
| <b>BLEU Sewer</b> |                  |  |                                      |                           |                        |                       |                              |
| Pu-238            | 1,625,345        | 5.55E-11                                     | 8.96E-11                             | 1.73E-10                  | 9.01E-08               | 5.27E-09              | 2.77E-04                     |
| Pu-239/240        | 1,625,345        | 1.66E-11                                     | 7.30E-11                             | 1.69E-10                  | 2.70E-08               | 4.34E-07              | 8.31E-05                     |
| Tc-99             | 1,625,345        | -1.23E-08                                    | 2.35E-08                             | 4.27E-08                  | -2.00E-05              | -1.18E-03             | -2.05E-05                    |
| Th-228            | 1,625,345        | 3.41E-11                                     | 1.56E-10                             | 3.70E-10                  | 5.54E-08               | 6.76E-11              | 1.70E-05                     |
| Th-230            | 1,625,345        | 1.50E-11                                     | 1.34E-10                             | 2.35E-10                  | 2.45E-08               | 1.21E-06              | 1.50E-05                     |
| Th-232            | 1,625,345        | 3.39E-12                                     | 1.20E-10                             | 2.08E-10                  | 5.51E-09               | 5.06E-02              | 1.13E-05                     |
| U-232             | 1,625,345        | 3.46E-11                                     | 1.15E-10                             | 3.04E-10                  | 5.62E-08               | 2.63E-09              | 5.77E-05                     |
| U-233/234         | 1,625,345        | 3.46E-10                                     | 2.39E-10                             | 1.80E-10                  | 5.62E-07               | 9.01E-05              | 1.15E-04                     |
| U-235/236         | 1,625,345        | 6.40E-11                                     | 9.48E-11                             | 1.62E-10                  | 1.04E-07               | 4.81E-02              | 2.13E-05                     |
| U-238             | 1,625,345        | 7.96E-11                                     | 1.16E-10                             | 1.80E-10                  | 1.29E-07               | 3.86E-01              | 2.65E-05                     |
|                   |                  |  |                                      |                           |                        | <b>Total:</b>         | <b>6.04E-04</b>              |
| <b>Sewer</b>      |                  |  |                                      |                           |                        |                       |                              |
| Pu-238            | 17,469,999       | 1.97E-11                                     | 8.49E-11                             | 1.90E-10                  | 3.44E-07               | 2.01E-08              | 9.86E-05                     |
| Pu-239/240        | 17,469,999       | 7.48E-12                                     | 6.28E-11                             | 1.76E-10                  | 1.31E-07               | 2.10E-06              | 3.74E-05                     |
| Tc-99             | 17,469,999       | -1.06E-08                                    | 2.20E-08                             | 4.00E-08                  | -1.85E-04              | -1.10E-02             | -1.77E-05                    |
| Th-228            | 17,469,999       | 5.83E-11                                     | 1.75E-10                             | 4.09E-10                  | 1.02E-06               | 1.24E-09              | 2.92E-05                     |
| Th-230            | 17,469,999       | 2.58E-10                                     | 2.24E-10                             | 2.37E-10                  | 4.50E-06               | 2.23E-04              | 2.58E-04                     |
| Th-232            | 17,469,999       | -1.31E-11                                    | 1.27E-10                             | 2.48E-10                  | -2.29E-07              | -2.10E+00             | -4.38E-05                    |
| U-232             | 17,469,999       | 7.77E-11                                     | 2.29E-10                             | 2.66E-10                  | 1.36E-06               | 6.34E-08              | 1.29E-04                     |
| U-233/234         | 17,469,999       | 1.49E-08                                     | 1.58E-09                             | 2.15E-10                  | 2.61E-04               | 4.19E-02              | 4.98E-03                     |
| U-235/236         | 17,469,999       | 6.49E-10                                     | 3.15E-10                             | 1.65E-10                  | 1.13E-05               | 5.25E+00              | 2.16E-04                     |
| U-238             | 17,469,999       | 2.23E-09                                     | 6.16E-10                             | 2.08E-10                  | 3.90E-05               | 1.16E+02              | 7.44E-04                     |
|                   |                  |  |                                      |                           |                        | <b>Total:</b>         | <b>6.43E-03</b>              |
| <b>WWTF</b>       |                  |  |                                      |                           |                        |                       |                              |
| Am-241            | 2,435,527        | -1.09E-11                                    | 5.56E-11                             | 1.25E-10                  | -2.65E-08              | -7.72E-09             | -5.43E-04                    |
| Cs-137            | 2,435,527        | -3.48E-11                                    | 1.09E-09                             | 1.84E-09                  | -8.48E-08              | -9.74E-10             | -3.48E-05                    |
| Na-22             | 2,435,527        | 4.58E-10                                     | 1.01E-09                             | 1.77E-09                  | 1.12E-06               | 1.79E-10              | 7.64E-05                     |
| Np-237            | 2,435,527        | -9.14E-11                                    | -1.37E-10                            | 2.46E-10                  | 2.23E-07               | 3.16E-04              | 4.57E-03                     |
| Pb-212            | 2,435,527        | -5.14E-10                                    | 3.47E-09                             | 3.79E-09                  | -1.25E-06              | -9.05E-13             | -2.57E-04                    |
| Pu-238            | 2,435,527        | -1.05E-12                                    | 6.46E-11                             | 1.82E-10                  | -2.57E-09              | -1.50E-10             | -5.27E-05                    |
| Pu-239/240        | 2,435,527        | 2.09E-11                                     | 7.58E-11                             | 1.74E-10                  | 5.09E-08               | 8.19E-07              | 1.05E-03                     |
| Pu-241            | 2,435,527        | -6.45E-10                                    | 7.44E-09                             | 1.30E-08                  | -1.57E-06              | -1.52E-08             | -6.45E-04                    |
| Ra-224            | 2,435,527        | 1.24E-08                                     | 5.03E-09                             | 9.99E-09                  | 3.01E-05               | 1.90E-10              | 6.19E-02                     |
| Tc-99             | 2,435,527        | 1.66E-09                                     | 3.71E-08                             | 6.53E-08                  | 4.04E-06               | 2.39E-04              | 2.76E-05                     |
| Th-228            | 2,435,527        | 4.20E-11                                     | 1.22E-10                             | 2.66E-10                  | 1.02E-07               | 1.25E-10              | 2.10E-04                     |
| Th-230            | 2,435,527        | 1.39E-10                                     | 1.66E-10                             | 2.16E-10                  | 3.37E-07               | 1.67E-05              | 1.39E-03                     |
| Th-231            | 2,435,527        | 5.34E-09                                     | 2.15E-08                             | 2.81E-08                  | 1.30E-05               | 2.44E-11              | 1.07E-04                     |
| Th-232            | 2,435,527        | 1.00E-11                                     | 9.70E-11                             | 2.12E-10                  | 2.44E-08               | 2.23E-01              | 3.33E-04                     |
| U-232             | 2,435,527        | 2.27E-11                                     | 8.77E-11                             | 3.00E-10                  | 5.54E-08               | 2.59E-09              | 3.79E-04                     |
| U-233/234         | 2,435,527        | 3.30E-08                                     | 2.07E-09                             | 1.74E-10                  | 8.03E-05               | 1.29E-02              | 1.10E-01                     |

<sup>1</sup> ECV: Effluent Concentration Value from 10-CFR-20, Appendix B.

## Radioactivity in Effluent Liquid January 1, 2010 to June 30, 2010

| Location    | Total Volume (l) | Activity Concentration ( $\mu\text{Ci/ml}$ ) | Error Estimate ( $\mu\text{Ci/ml}$ ) | LLD ( $\mu\text{Ci/ml}$ ) | Quantity Released (Ci) | Quantity Released (g) | Fraction of ECV <sup>1</sup> |
|-------------|------------------|--|--------------------------------------|---------------------------|------------------------|-----------------------|------------------------------|
| <b>WWTF</b> |                  |  |                                      |                           |                        |                       |                              |
| U-235/236   | 2,435,527        | 1.46E-09                                     | 4.24E-10                             | 1.67E-10                  | 3.56E-06               | 1.65E+00              | 4.87E-03                     |
| U-238       | 2,435,527        | 5.97E-10                                     | 2.91E-10                             | 1.44E-10                  | 1.45E-06               | 4.34E+00              | 1.99E-03                     |
|             |                  |  |                                      |                           |                        | <b>Total:</b>         | <b>1.85E-01</b>              |

<sup>1</sup> ECV: Effluent Concentration Value from 10-CFR-20, Appendix B.

21G-10-0165  
GOV-01-55  
ACF-10-0231

***Attachment B***  
***To Letter Dated August 18, 2010***

***Report of Radioactivity in Effluent Air for the Period***  
***January – June 2010***

**(Five Pages to Follow)**

## Radioactivity in Effluent Air January 1, 2010 to June 30, 2010

| Location                   | Total Volume (m <sup>3</sup> ) | Activity Concentration (μCi/ml)  | Error Estimate (μCi/ml) | LLD (μCi/ml)                   | Quantity Released (Ci) | Quantity Released (g) | Fraction of ECV <sup>1</sup> |
|----------------------------|--------------------------------|----------------------------------|-------------------------|--------------------------------|------------------------|-----------------------|------------------------------|
| <b>Main Stack 416</b>      |                                | <b>1019.11 m<sup>3</sup>/min</b> |                         | <b>16.99 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                      | 265,619,968                    | 7.14E-14                         | 3.71E-14                | 4.88E-14                       | 1.90E-05               | 1.12E-03              | 7.93E-05                     |
| Th-228                     | 265,619,968                    | 1.36E-16                         | 7.26E-17                | 9.52E-17                       | 3.61E-08               | 4.41E-11              | 6.79E-03                     |
| Th-230                     | 265,619,968                    | 7.24E-17                         | 3.87E-17                | 5.08E-17                       | 1.92E-08               | 9.53E-07              | 3.62E-03                     |
| Th-232                     | 265,619,968                    | 4.53E-17                         | 2.42E-17                | 3.17E-17                       | 1.20E-08               | 1.10E-01              | 1.13E-02                     |
| U-234                      | 265,619,968                    | 4.20E-14                         | 2.24E-14                | 2.95E-14                       | 1.12E-05               | 1.79E-03              | 8.40E-01                     |
| U-235                      | 265,619,968                    | 2.67E-15                         | 1.43E-15                | 1.87E-15                       | 7.10E-07               | 3.28E-01              | 4.45E-02                     |
| U-238                      | 265,619,968                    | 3.35E-16                         | 1.79E-16                | 2.35E-16                       | 8.90E-08               | 2.66E-01              | 5.58E-03                     |
|                            |                                |                                  |                         |                                |                        | <b>Total:</b>         | <b>9.12E-01</b>              |
| <b>Stack 185 Bldg. 131</b> |                                | <b>107.60 m<sup>3</sup>/min</b>  |                         | <b>1.79 m<sup>3</sup>/sec</b>  |                        |                       |                              |
| Tc-99                      | 28,045,914                     | 4.95E-14                         | 3.50E-14                | 5.09E-14                       | 1.39E-06               | 8.21E-05              | 5.50E-05                     |
| Th-230                     | 28,045,914                     | 1.40E-19                         | 7.19E-19                | 1.47E-18                       | 3.93E-12               | 1.95E-10              | 7.01E-06                     |
| Th-231                     | 28,045,914                     | 6.32E-16                         | 4.46E-16                | 6.50E-16                       | 1.77E-08               | 3.33E-14              | 7.02E-08                     |
| U-234                      | 28,045,914                     | 3.13E-15                         | 1.61E-14                | 3.29E-14                       | 8.78E-08               | 1.41E-05              | 6.26E-02                     |
| U-235                      | 28,045,914                     | 5.25E-17                         | 2.70E-16                | 5.52E-16                       | 1.47E-09               | 6.82E-04              | 8.76E-04                     |
| U-238                      | 28,045,914                     | 6.05E-20                         | 3.11E-19                | 6.36E-19                       | 1.70E-12               | 5.06E-06              | 1.01E-06                     |
|                            |                                |                                  |                         |                                |                        | <b>Total:</b>         | <b>6.35E-02</b>              |
| <b>Stack 234 Bldg. 234</b> |                                | <b>282.37 m<sup>3</sup>/min</b>  |                         | <b>4.71 m<sup>3</sup>/sec</b>  |                        |                       |                              |
| Am-241                     | 74,003,292                     | 4.41E-16                         | 7.55E-16                | 1.31E-15                       | 3.27E-08               | 9.52E-09              | 2.21E-02                     |
| Pu-238                     | 74,003,292                     | 8.93E-17                         | 1.53E-16                | 2.65E-16                       | 6.61E-09               | 3.87E-10              | 4.47E-03                     |
| Pu-239                     | 74,003,292                     | 7.47E-16                         | 1.28E-15                | 2.22E-15                       | 5.53E-08               | 8.88E-07              | 3.73E-02                     |
| Pu-240                     | 74,003,292                     | 2.63E-16                         | 4.50E-16                | 7.80E-16                       | 1.94E-08               | 8.53E-08              | 1.31E-02                     |
| Pu-241                     | 74,003,292                     | 1.33E-14                         | 5.50E-15                | 7.71E-15                       | 9.87E-07               | 9.58E-09              | 1.67E-02                     |
|                            |                                |                                  |                         |                                |                        | <b>Total:</b>         | <b>9.37E-02</b>              |
| <b>Stack 327 Bldg. 330</b> |                                | <b>727.89 m<sup>3</sup>/min</b>  |                         | <b>12.13 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                      | 188,782,605                    | 1.55E-13                         | 3.79E-14                | 4.50E-14                       | 2.92E-05               | 1.73E-03              | 1.72E-04                     |
| Th-230                     | 188,782,605                    | 5.65E-18                         | 1.22E-18                | 1.24E-18                       | 1.07E-09               | 5.28E-08              | 2.83E-04                     |
| Th-231                     | 188,782,605                    | 1.98E-15                         | 4.84E-16                | 5.75E-16                       | 3.73E-07               | 7.01E-13              | 2.20E-07                     |
| U-234                      | 188,782,605                    | 1.26E-13                         | 2.73E-14                | 2.77E-14                       | 2.38E-05               | 3.82E-03              | 2.53E+00                     |
| U-235                      | 188,782,605                    | 2.12E-15                         | 4.58E-16                | 4.65E-16                       | 4.00E-07               | 1.85E-01              | 3.53E-02                     |
| U-238                      | 188,782,605                    | 2.44E-18                         | 5.28E-19                | 5.35E-19                       | 4.61E-10               | 1.38E-03              | 4.07E-05                     |
|                            |                                |                                  |                         |                                |                        | <b>Total:</b>         | <b>2.56E+00</b>              |
| <b>Stack 421 Bldg. 100</b> |                                | <b>21.01 m<sup>3</sup>/min</b>   |                         | <b>0.35 m<sup>3</sup>/sec</b>  |                        |                       |                              |
| Tc-99                      | 5,476,334                      | 2.55E-13                         | 5.64E-14                | 6.36E-14                       | 1.40E-06               | 8.26E-05              | 2.83E-04                     |
| Th-230                     | 5,476,334                      | 1.01E-17                         | 2.05E-18                | 1.79E-18                       | 5.52E-11               | 2.73E-09              | 5.04E-04                     |
| Th-231                     | 5,476,334                      | 3.26E-15                         | 7.20E-16                | 8.12E-16                       | 1.78E-08               | 3.35E-14              | 3.62E-07                     |
| U-234                      | 5,476,334                      | 2.25E-13                         | 4.58E-14                | 3.99E-14                       | 1.23E-06               | 1.98E-04              | 4.51E+00                     |
| U-235                      | 5,476,334                      | 3.78E-15                         | 7.69E-16                | 6.70E-16                       | 2.07E-08               | 9.59E-03              | 6.30E-02                     |
| U-238                      | 5,476,334                      | 4.35E-18                         | 8.85E-19                | 7.71E-19                       | 2.38E-11               | 7.12E-05              | 7.26E-05                     |
|                            |                                |                                  |                         |                                |                        | <b>Total:</b>         | <b>4.57E+00</b>              |

<sup>1</sup> ECV: Effluent Concentration Value from 10-CFR-20, Appendix B. Fraction of ECV at the stack is provided for reference only. Concentrations at off-site locations are significantly less than those reported here (at stack) due to the atmospheric dispersion that occurs before the effluent exits the site.

## Radioactivity in Effluent Air

### January 1, 2010 to June 30, 2010

| Location                    | Total Volume (m <sup>3</sup> ) | Activity Concentration (μCi/ml) | Error Estimate (μCi/ml) | LLD (μCi/ml)                  | Quantity Released (Ci) | Quantity Released (g) | Fraction of ECV <sup>1</sup> |
|-----------------------------|--------------------------------|---------------------------------|-------------------------|-------------------------------|------------------------|-----------------------|------------------------------|
| <b>Stack 424 Bldg. 100</b>  |                                | <b>25.54 m<sup>3</sup>/min</b>  |                         | <b>0.43 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                       | 6,657,214                      | 6.64E-14                        | 3.62E-14                | 4.83E-14                      | 4.42E-07               | 2.62E-05              | 7.38E-05                     |
| Th-230                      | 6,657,214                      | 3.69E-19                        | 7.48E-19                | 1.40E-18                      | 2.46E-12               | 1.22E-10              | 1.84E-05                     |
| Th-231                      | 6,657,214                      | 8.48E-16                        | 4.62E-16                | 6.17E-16                      | 5.65E-09               | 1.06E-14              | 9.42E-08                     |
| U-234                       | 6,657,214                      | 8.24E-15                        | 1.67E-14                | 3.13E-14                      | 5.49E-08               | 8.79E-06              | 1.65E-01                     |
| U-235                       | 6,657,214                      | 1.38E-16                        | 2.80E-16                | 5.25E-16                      | 9.21E-10               | 4.26E-04              | 2.31E-03                     |
| U-238                       | 6,657,214                      | 1.59E-19                        | 3.23E-19                | 6.04E-19                      | 1.06E-12               | 3.17E-06              | 2.65E-06                     |
|                             |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>1.67E-01</b>              |
| <b>Stack 501 Bldg. 510</b>  |                                | <b>63.29 m<sup>3</sup>/min</b>  |                         | <b>1.05 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                       | 16,403,639                     | 2.91E-14                        | 1.56E-14                | 2.06E-14                      | 4.78E-07               | 2.83E-05              | 3.24E-05                     |
| Th-228                      | 16,403,639                     | 2.47E-16                        | 1.66E-15                | 3.40E-15                      | 4.06E-09               | 4.96E-12              | 1.24E-02                     |
| Th-230                      | 16,403,639                     | 2.78E-16                        | 1.86E-15                | 3.82E-15                      | 4.57E-09               | 2.26E-07              | 1.39E-02                     |
| Th-232                      | 16,403,639                     | 2.60E-16                        | 1.74E-15                | 3.57E-15                      | 4.26E-09               | 3.91E-02              | 6.49E-02                     |
| U-234                       | 16,403,639                     | 8.45E-16                        | 5.66E-15                | 1.16E-14                      | 1.39E-08               | 2.22E-06              | 1.69E-02                     |
| U-235                       | 16,403,639                     | 1.58E-16                        | 1.06E-15                | 2.17E-15                      | 2.59E-09               | 1.20E-03              | 2.63E-03                     |
| U-238                       | 16,403,639                     | 2.74E-16                        | 1.84E-15                | 3.77E-15                      | 4.50E-09               | 1.34E-02              | 4.57E-03                     |
|                             |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>1.15E-01</b>              |
| <b>Stack 502 OCB</b>        |                                | <b>205.54 m<sup>3</sup>/min</b> |                         | <b>3.43 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                       | 53,571,652                     | 1.96E-14                        | 6.59E-15                | 8.06E-15                      | 1.05E-06               | 6.20E-05              | 2.17E-05                     |
| Th-228                      | 53,571,652                     | 5.48E-16                        | 6.81E-16                | 1.29E-15                      | 2.93E-08               | 3.58E-11              | 2.74E-02                     |
| Th-230                      | 53,571,652                     | 6.16E-16                        | 7.66E-16                | 1.46E-15                      | 3.30E-08               | 1.63E-06              | 3.08E-02                     |
| Th-232                      | 53,571,652                     | 5.75E-16                        | 7.15E-16                | 1.36E-15                      | 3.08E-08               | 2.83E-01              | 1.44E-01                     |
| U-234                       | 53,571,652                     | 1.87E-15                        | 2.33E-15                | 4.42E-15                      | 1.00E-07               | 1.61E-05              | 3.74E-02                     |
| U-235                       | 53,571,652                     | 3.50E-16                        | 4.34E-16                | 8.26E-16                      | 1.87E-08               | 8.67E-03              | 5.83E-03                     |
| U-238                       | 53,571,652                     | 6.07E-16                        | 7.54E-16                | 1.43E-15                      | 3.25E-08               | 9.71E-02              | 1.01E-02                     |
|                             |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>2.55E-01</b>              |
| <b>Stack 503 EPB</b>        |                                | <b>5.97 m<sup>3</sup>/min</b>   |                         | <b>0.10 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                       | 1,565,890                      | 2.10E-14                        | 4.98E-15                | 4.14E-15                      | 3.29E-08               | 1.95E-06              | 2.34E-05                     |
| Th-228                      | 1,565,890                      | 1.70E-16                        | 3.70E-16                | 6.85E-16                      | 2.66E-10               | 3.25E-13              | 8.49E-03                     |
| Th-230                      | 1,565,890                      | 1.91E-16                        | 4.16E-16                | 7.71E-16                      | 2.99E-10               | 1.48E-08              | 9.55E-03                     |
| Th-232                      | 1,565,890                      | 1.78E-16                        | 3.89E-16                | 7.20E-16                      | 2.79E-10               | 2.56E-03              | 4.46E-02                     |
| U-234                       | 1,565,890                      | 5.80E-16                        | 1.26E-15                | 2.34E-15                      | 9.09E-10               | 1.46E-07              | 1.16E-02                     |
| U-235                       | 1,565,890                      | 1.08E-16                        | 2.36E-16                | 4.37E-16                      | 1.70E-10               | 7.86E-05              | 1.81E-03                     |
| U-238                       | 1,565,890                      | 1.88E-16                        | 4.10E-16                | 7.60E-16                      | 2.95E-10               | 8.80E-04              | 3.14E-03                     |
|                             |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>7.92E-02</b>              |
| <b>Stack 573 Bldg 306-W</b> |                                | <b>65.04 m<sup>3</sup>/min</b>  |                         | <b>1.08 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                       | 16,953,017                     | 2.79E-14                        | 2.17E-14                | 3.26E-14                      | 4.73E-07               | 2.80E-05              | 3.10E-05                     |
| Th-230                      | 16,953,017                     | 8.74E-20                        | 4.33E-19                | 8.92E-19                      | 1.48E-12               | 7.34E-11              | 4.37E-06                     |
| Th-231                      | 16,953,017                     | 3.56E-16                        | 2.77E-16                | 4.16E-16                      | 6.04E-09               | 1.13E-14              | 3.96E-08                     |
| U-234                       | 16,953,017                     | 1.95E-15                        | 9.68E-15                | 1.99E-14                      | 3.31E-08               | 5.31E-06              | 3.91E-02                     |

<sup>1</sup> ECV: Effluent Concentration Value from 10-CFR-20, Appendix B. Fraction of ECV at the stack is provided for reference only. Concentrations at off-site locations are significantly less than those reported here (at stack) due to the atmospheric dispersion that occurs before the effluent exits the site.



## Radioactivity in Effluent Air January 1, 2010 to June 30, 2010

| Location                     | Total Volume (m <sup>3</sup> ) | Activity Concentration (μCi/ml) | Error Estimate (μCi/ml) | LLD (μCi/ml)                  | Quantity Released (Ci) | Quantity Released (g) | Fraction of ECV <sup>1</sup> |
|------------------------------|--------------------------------|---------------------------------|-------------------------|-------------------------------|------------------------|-----------------------|------------------------------|
| <b>Stack 573 Bldg 306-W</b>  |                                | <b>65.04 m<sup>3</sup>/min</b>  |                         | <b>1.08 m<sup>3</sup>/sec</b> |                        |                       |                              |
| U-235                        | 16,953,017                     | 3.28E-17                        | 1.62E-16                | 3.34E-16                      | 5.56E-10               | 2.57E-04              | 5.46E-04                     |
| U-238                        | 16,953,017                     | 3.78E-20                        | 1.87E-19                | 3.85E-19                      | 6.40E-13               | 1.91E-06              | 6.29E-07                     |
|                              |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>3.96E-02</b>              |
| <b>Stack 600 Bldg. 110</b>   |                                | <b>306.13 m<sup>3</sup>/min</b> |                         | <b>5.10 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                        | 79,790,626                     | 9.75E-14                        | 2.34E-14                | 3.06E-14                      | 7.78E-06               | 4.60E-04              | 1.08E-04                     |
| Th-230                       | 79,790,626                     | 1.00E-18                        | 5.31E-19                | 8.38E-19                      | 8.00E-11               | 3.96E-09              | 5.01E-05                     |
| Th-231                       | 79,790,626                     | 1.24E-15                        | 2.99E-16                | 3.90E-16                      | 9.93E-08               | 1.87E-13              | 1.38E-07                     |
| U-234                        | 79,790,626                     | 2.24E-14                        | 1.19E-14                | 1.87E-14                      | 1.79E-06               | 2.86E-04              | 4.48E-01                     |
| U-235                        | 79,790,626                     | 3.76E-16                        | 1.99E-16                | 3.14E-16                      | 3.00E-08               | 1.39E-02              | 6.27E-03                     |
| U-238                        | 79,790,626                     | 4.33E-19                        | 2.29E-19                | 3.62E-19                      | 3.45E-11               | 1.03E-04              | 7.22E-06                     |
|                              |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>4.54E-01</b>              |
| <b>Stack 615 Bldg. 306-W</b> |                                | <b>27.89 m<sup>3</sup>/min</b>  |                         | <b>0.46 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                        | 7,269,796                      | 2.85E-14                        | 2.21E-14                | 3.32E-14                      | 2.07E-07               | 1.22E-05              | 3.16E-05                     |
| Th-230                       | 7,269,796                      | 9.14E-20                        | 4.43E-19                | 9.09E-19                      | 6.65E-13               | 3.29E-11              | 4.57E-06                     |
| Th-231                       | 7,269,796                      | 3.63E-16                        | 2.82E-16                | 4.24E-16                      | 2.64E-09               | 4.96E-15              | 4.04E-08                     |
| U-234                        | 7,269,796                      | 2.04E-15                        | 9.91E-15                | 2.03E-14                      | 1.49E-08               | 2.38E-06              | 4.09E-02                     |
| U-235                        | 7,269,796                      | 3.43E-17                        | 1.66E-16                | 3.41E-16                      | 2.49E-10               | 1.15E-04              | 5.71E-04                     |
| U-238                        | 7,269,796                      | 3.95E-20                        | 1.91E-19                | 3.92E-19                      | 2.87E-13               | 8.57E-07              | 6.58E-07                     |
|                              |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>4.15E-02</b>              |
| <b>Stack 646 Bldg. 110</b>   |                                | <b>46.16 m<sup>3</sup>/min</b>  |                         | <b>0.77 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                        | 12,030,221                     | 5.44E-14                        | 3.46E-14                | 4.89E-14                      | 6.54E-07               | 3.87E-05              | 6.04E-05                     |
| Th-230                       | 12,030,221                     | 2.86E-19                        | 7.04E-19                | 1.42E-18                      | 3.43E-12               | 1.70E-10              | 1.43E-05                     |
| Th-231                       | 12,030,221                     | 6.94E-16                        | 4.42E-16                | 6.25E-16                      | 8.35E-09               | 1.57E-14              | 7.72E-08                     |
| U-234                        | 12,030,221                     | 6.38E-15                        | 1.57E-14                | 3.17E-14                      | 7.67E-08               | 1.23E-05              | 1.28E-01                     |
| U-235                        | 12,030,221                     | 1.07E-16                        | 2.64E-16                | 5.32E-16                      | 1.29E-09               | 5.96E-04              | 1.78E-03                     |
| U-238                        | 12,030,221                     | 1.23E-19                        | 3.04E-19                | 6.12E-19                      | 1.48E-12               | 4.43E-06              | 2.05E-06                     |
|                              |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>1.29E-01</b>              |
| <b>Stack 649 Bldg. 330</b>   |                                | <b>9.46 m<sup>3</sup>/min</b>   |                         | <b>0.16 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                        | 2,466,148                      | 9.24E-14                        | 1.90E-14                | 2.72E-14                      | 2.28E-07               | 1.35E-05              | 1.03E-04                     |
| Th-230                       | 2,466,148                      | 2.46E-19                        | 3.68E-19                | 7.05E-19                      | 6.06E-13               | 3.00E-11              | 1.23E-05                     |
| Th-231                       | 2,466,148                      | 1.18E-15                        | 2.43E-16                | 3.48E-16                      | 2.92E-09               | 5.48E-15              | 1.31E-07                     |
| U-234                        | 2,466,148                      | 5.50E-15                        | 8.22E-15                | 1.57E-14                      | 1.36E-08               | 2.17E-06              | 1.10E-01                     |
| U-235                        | 2,466,148                      | 9.25E-17                        | 1.38E-16                | 2.65E-16                      | 2.28E-10               | 1.06E-04              | 1.54E-03                     |
| U-238                        | 2,466,148                      | 1.06E-19                        | 1.59E-19                | 3.04E-19                      | 2.62E-13               | 7.82E-07              | 1.77E-06                     |
|                              |                                |                                 |                         |                               |                        | <b>Total:</b>         | <b>1.12E-01</b>              |
| <b>Stack 701 Bldg. 307</b>   |                                | <b>148.47 m<sup>3</sup>/min</b> |                         | <b>2.47 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                        | 38,695,981                     | 4.37E-14                        | 2.45E-14                | 3.33E-14                      | 1.69E-06               | 1.00E-04              | 4.85E-05                     |
| Th-230                       | 38,695,981                     | 6.62E-19                        | 6.03E-19                | 9.14E-19                      | 2.56E-11               | 1.27E-09              | 3.31E-05                     |
| Th-231                       | 38,695,981                     | 5.58E-16                        | 3.12E-16                | 4.25E-16                      | 2.16E-08               | 4.06E-14              | 6.19E-08                     |

<sup>1</sup> ECV: Effluent Concentration Value from 10-CFR-20, Appendix B. Fraction of ECV at the stack is provided for reference only. Concentrations at off-site locations are significantly less than those reported here (at stack) due to the atmospheric dispersion that occurs before the effluent exits the site.

## Radioactivity in Effluent Air January 1, 2010 to June 30, 2010

| Location                              | Total Volume (m <sup>3</sup> ) | Activity Concentration (μCi/ml) | Error Estimate (μCi/ml) | LLD (μCi/ml)                   | Quantity Released (Ci) | Quantity Released (g) | Fraction of ECV <sup>1</sup> |
|---------------------------------------|--------------------------------|---------------------------------|-------------------------|--------------------------------|------------------------|-----------------------|------------------------------|
| <b>Stack 701 Bldg. 307</b>            |                                | <b>148.47 m<sup>3</sup>/min</b> |                         | <b>2.47 m<sup>3</sup>/sec</b>  |                        |                       |                              |
| U-234                                 | 38,695,981                     | 1.48E-14                        | 1.35E-14                | 2.04E-14                       | 5.73E-07               | 9.18E-05              | 2.96E-01                     |
| U-235                                 | 38,695,981                     | 2.48E-16                        | 2.26E-16                | 3.43E-16                       | 9.61E-09               | 4.45E-03              | 4.14E-03                     |
| U-238                                 | 38,695,981                     | 2.86E-19                        | 2.60E-19                | 3.95E-19                       | 1.11E-11               | 3.30E-05              | 4.77E-06                     |
| <b>Total:</b>                         |                                |                                 |                         |                                |                        |                       | <b>3.00E-01</b>              |
| <b>Stack 702 Bldg. 307</b>            |                                | <b>149.34 m<sup>3</sup>/min</b> |                         | <b>2.49 m<sup>3</sup>/sec</b>  |                        |                       |                              |
| Tc-99                                 | 38,924,777                     | 2.93E-14                        | 2.20E-14                | 3.26E-14                       | 1.14E-06               | 6.76E-05              | 3.26E-05                     |
| Th-230                                | 38,924,777                     | 1.80E-19                        | 4.63E-19                | 8.92E-19                       | 7.01E-12               | 3.47E-10              | 9.00E-06                     |
| Th-231                                | 38,924,777                     | 3.75E-16                        | 2.81E-16                | 4.16E-16                       | 1.46E-08               | 2.74E-14              | 4.16E-08                     |
| U-234                                 | 38,924,777                     | 4.02E-15                        | 1.03E-14                | 1.99E-14                       | 1.57E-07               | 2.51E-05              | 8.05E-02                     |
| U-235                                 | 38,924,777                     | 6.75E-17                        | 1.74E-16                | 3.34E-16                       | 2.63E-09               | 1.22E-03              | 1.13E-03                     |
| U-238                                 | 38,924,777                     | 7.78E-20                        | 2.00E-19                | 3.85E-19                       | 3.03E-12               | 9.03E-06              | 1.30E-06                     |
| <b>Total:</b>                         |                                |                                 |                         |                                |                        |                       | <b>8.16E-02</b>              |
| <b>Stack 703 Exhaust Room Air</b>     |                                | <b>739.74 m<sup>3</sup>/min</b> |                         | <b>12.33 m<sup>3</sup>/sec</b> |                        |                       |                              |
| Tc-99                                 | 192,804,611                    | 2.67E-14                        | 2.00E-14                | 2.97E-14                       | 5.16E-06               | 3.05E-04              | 2.97E-05                     |
| Th-228                                | 192,804,611                    | 3.79E-16                        | 6.68E-16                | 1.22E-15                       | 7.31E-08               | 8.92E-11              | 1.90E-02                     |
| Th-230                                | 192,804,611                    | 3.22E-16                        | 5.68E-16                | 1.04E-15                       | 6.21E-08               | 3.07E-06              | 1.61E-02                     |
| Th-232                                | 192,804,611                    | 3.59E-16                        | 6.32E-16                | 1.15E-15                       | 6.92E-08               | 6.35E-01              | 8.97E-02                     |
| U-234                                 | 192,804,611                    | 3.85E-15                        | 6.79E-15                | 1.24E-14                       | 7.43E-07               | 1.19E-04              | 7.71E-02                     |
| U-235                                 | 192,804,611                    | 5.30E-16                        | 9.34E-16                | 1.70E-15                       | 1.02E-07               | 4.73E-02              | 8.83E-03                     |
| U-238                                 | 192,804,611                    | 2.05E-16                        | 3.61E-16                | 6.60E-16                       | 3.95E-08               | 1.18E-01              | 3.42E-03                     |
| <b>Total:</b>                         |                                |                                 |                         |                                |                        |                       | <b>2.14E-01</b>              |
| <b>Stack 704 Process Exhaust (H2)</b> |                                | <b>63.32 m<sup>3</sup>/min</b>  |                         | <b>1.06 m<sup>3</sup>/sec</b>  |                        |                       |                              |
| Tc-99                                 | 16,502,806                     | 3.32E-14                        | 2.36E-14                | 3.45E-14                       | 5.49E-07               | 3.25E-05              | 3.69E-05                     |
| Th-228                                | 16,502,806                     | 2.93E-16                        | 7.44E-16                | 1.43E-15                       | 4.84E-09               | 5.90E-12              | 1.47E-02                     |
| Th-230                                | 16,502,806                     | 2.49E-16                        | 6.32E-16                | 1.22E-15                       | 4.11E-09               | 2.03E-07              | 1.24E-02                     |
| Th-232                                | 16,502,806                     | 2.77E-16                        | 7.04E-16                | 1.35E-15                       | 4.58E-09               | 4.20E-02              | 6.93E-02                     |
| U-234                                 | 16,502,806                     | 2.98E-15                        | 7.56E-15                | 1.46E-14                       | 4.92E-08               | 7.88E-06              | 5.96E-02                     |
| U-235                                 | 16,502,806                     | 4.10E-16                        | 1.04E-15                | 2.00E-15                       | 6.76E-09               | 3.13E-03              | 6.83E-03                     |
| U-238                                 | 16,502,806                     | 1.59E-16                        | 4.02E-16                | 7.74E-16                       | 2.62E-09               | 7.81E-03              | 2.64E-03                     |
| <b>Total:</b>                         |                                |                                 |                         |                                |                        |                       | <b>1.66E-01</b>              |
| <b>Stack 773 Bldg. 440</b>            |                                | <b>175.57 m<sup>3</sup>/min</b> |                         | <b>2.93 m<sup>3</sup>/sec</b>  |                        |                       |                              |
| Tc-99                                 | 45,759,531                     | 9.08E-14                        | 4.59E-14                | 5.97E-14                       | 4.16E-06               | 2.46E-04              | 1.01E-04                     |
| Th-228                                | 45,759,531                     | 7.52E-16                        | 2.37E-15                | 4.67E-15                       | 3.44E-08               | 4.20E-11              | 3.76E-02                     |
| Th-230                                | 45,759,531                     | 8.46E-16                        | 2.67E-15                | 5.26E-15                       | 3.87E-08               | 1.92E-06              | 4.23E-02                     |
| Th-232                                | 45,759,531                     | 7.90E-16                        | 2.49E-15                | 4.91E-15                       | 3.61E-08               | 3.32E-01              | 1.97E-01                     |
| U-234                                 | 45,759,531                     | 2.57E-15                        | 8.10E-15                | 1.60E-14                       | 1.18E-07               | 1.89E-05              | 5.14E-02                     |
| U-235                                 | 45,759,531                     | 4.80E-16                        | 1.51E-15                | 2.98E-15                       | 2.20E-08               | 1.02E-02              | 8.00E-03                     |
| U-238                                 | 45,759,531                     | 8.34E-16                        | 2.63E-15                | 5.18E-15                       | 3.82E-08               | 1.14E-01              | 1.39E-02                     |
| <b>Total:</b>                         |                                |                                 |                         |                                |                        |                       | <b>3.51E-01</b>              |

<sup>1</sup> ECV: Effluent Concentration Value from 10-CFR-20, Appendix B. Fraction of ECV at the stack is provided for reference only. Concentrations at off-site locations are significantly less than those reported here (at stack) due to the atmospheric dispersion that occurs before the effluent exits the site.

## Radioactivity in Effluent Air January 1, 2010 to June 30, 2010

| Location            | Total Volume (m <sup>3</sup> ) | Activity Concentration (μCi/ml) | Error Estimate (μCi/ml)  | LLD (μCi/ml) | Quantity Released (Ci) | Quantity Released (g) | Fraction of ECV <sup>1</sup> |
|---------------------|--------------------------------|---------------------------------|--------------------------|--------------|------------------------|-----------------------|------------------------------|
| Stack 774 Bldg. 301 |                                | 351.24 m <sup>3</sup> /min      | 5.85 m <sup>3</sup> /sec |              |                        |                       |                              |
| Th-230              | 91,547,769                     | 3.04E-17                        | 1.17E-17                 | 2.13E-17     | 2.78E-09               | 1.38E-07              | 1.52E-03                     |
| U-234               | 91,547,769                     | 9.90E-15                        | 3.81E-15                 | 6.93E-15     | 9.06E-07               | 1.45E-04              | 1.98E-01                     |
| U-235               | 91,547,769                     | 1.89E-16                        | 7.28E-17                 | 1.33E-16     | 1.73E-08               | 8.02E-03              | 3.15E-03                     |
|                     |                                |                                 |                          |              |                        | <b>Total:</b>         | <b>2.03E-01</b>              |

<sup>1</sup> ECV: Effluent Concentration Value from 10-CFR-20, Appendix B. Fraction of ECV at the stack is provided for reference only. Concentrations at off-site locations are significantly less than those reported here (at stack) due to the atmospheric dispersion that occurs before the effluent exits the site.

21G-10-0165  
GOV-01-55  
ACF-10-0231

*Attachment C*  
*To Letter Dated August 18, 2010*

*Report of Gaseous Effluent Dose and Activity Concentrations*  
*for the Maximally Exposed*  
*Off-Site Individual for the Release Period*  
*January - June 2010*

**(Three Pages to Follow)**

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**Report of Potential Gaseous Effluent Dose to the Maximally Exposed Offsite Individual and on the Maximum Radionuclide Concentrations for the Period: January through June 2010**

**Introduction**

During this biannual period, NRC License SNM-124, Part I, Section 5.1.1.3 required NFS to assess the total effective dose equivalent (TEDE) to the maximally exposed offsite receptor and the maximum radioactive air concentrations at the site boundary, attributable to NFS' air effluents. The required biannual assessment has been completed and the details of the assessment are provided in the subsequent sections.

**Summary of Methods**

In accordance with SNM-124, Section 5.1.1.4 and internal procedure NFS-HS-A-27, the U.S. Department of Energy's CAP88-PC computer program was used to estimate off-site doses and activity concentrations for gaseous effluents. NFS operated twenty (20)<sup>1</sup> radiological stacks during the 1<sup>st</sup> half of 2010. Based on effluent types and stack physical characteristics, releases from these stacks were grouped into effective stacks for modeling purposes. To accommodate the co-location limitation of the model, the effective stacks were taken to be at the approximate center of the plant site. The distance to the site boundary (nearest model receptor distance) was conservatively taken to be 150 meters for all sectors. Meteorological data were based on five-year average wind speed and direction frequencies as presented in NFS' 1996 Environmental Report. Atmospheric stability class D (neutral atmosphere) was used for all releases (default value recommended by the U.S. Environmental Protection Agency in "User's Guide for COMPLY"). The most conservative inhalation class was assumed for each radionuclide released. A particle size (activity median aerodynamic diameter or AMAD) of 1.0 microns was assumed for modeling purposes since no information on actual particle sizes exists.

Because CAP88-PC models releases over an entire year, the six-month source term (i.e., total curies of each radionuclide released over the period, given in Attachment B) was annualized (i.e., transformed into a 12-month release) so that airborne activity concentrations would not be under-estimated during the release period.

**Summary of Results**

Doses are reported in table 1 below and are derived from the CAP88-PC "Synopsis Report". These doses are at the location of the maximally exposed (off-site) individual (MEI). The results include an adjustment (using the normalization factor mentioned above) to convert the "annualized" doses back to those doses that were actually received in the six-month release period. Activity concentrations reported in table 2 come directly from the CAP88-PC "Concentration Tables" report; no adjustments are needed for these concentrations. The CAP88-PC output reports are available for review at NFS.

Table 1 summarizes the six-month dose to a hypothetical individual at the MEI location, which was determined to be approximately 400 meters North Northeast from the center of the plant site. The TEDE to the MEI was estimated to be 2.1E-03 mrem for gaseous effluents released during the 1<sup>st</sup> half of 2010. The highest organ committed dose equivalent (CDE) to the MEI was estimated to be 2.0E-03 mrem to the spleen. These MEI doses are well below SNM-124 license action levels and applicable regulatory limits/ALARA constraints.

<sup>1</sup> Sampling of stack #234 was initiated to collect background data although operation of the facility is not expected until later in 2010.

**Table 1. Organ Doses and Total Effective Dose Equivalent at the MEI Location**

| <b>Organ</b>                           | <b>Committed Dose Equivalent<br/>(mrem per 1<sup>st</sup> half of 2010)</b> |
|--|---|
| Adrenals                               | 2.6E-05   |
| Bone Surface                           | 8.8E-05   |
| Breasts                                | 4.1E-04   |
| Stomach Wall                           | 2.7E-05   |
| Upper Large Intestine Wall             | 2.9E-05   |
| Kidneys                                | 2.6E-05   |
| Lungs                                  | 1.1E-03   |
| Ovaries                                | 1.0E-04   |
| Red Bone Marrow                        | 6.9E-04   |
| Spleen                                 | 2.0E-03   |
| Thymus                                 | 5.3E-05   |
| Uterus                                 | 6.1E-05   |
| Bladder Wall                           | 6.8E-04   |
| Brain                                  | 2.8E-05   |
| Esophagus                              | 2.9E-05   |
| Small Intestine Wall                   | 2.6E-05   |
| Lower Large Intestine Wall             | 4.3E-05   |
| Liver                                  | 3.9E-05   |
| Muscle                                 | 2.7E-05   |
| Pancreas                               | 3.2E-05   |
| Skin                                   | 2.7E-05   |
| Testes                                 | 5.2E-04   |
| Thyroid                                | 2.6E-05   |
| <b>Total Effective Dose Equivalent</b> | <b>2.1E-03 mrem</b>   |
| Location of MEI:                       | 400 meters North Northeast  |

Table 2 summarizes the maximum radioactive air concentrations at or beyond the site boundary, as determined by CAP88-PC, for the radionuclides released. The total sum of fractions was estimated to be 2.5E-04 and indicates that exposures to offsite public from gaseous effluents were much less than 1% of the 10 CFR 20, Appendix B, Table 2, Col. 1 values for all offsite receptors including the site boundary. It is noted that the location of the maximum airborne concentration for a given radionuclide does not necessarily correspond to the MEI location. This is due primarily to the fact that the maximum concentrations for individual nuclides can vary due to large differences in values input into the dispersion model for each of the effective stacks—such inputs include stack height, stack diameter, flow rate, and total radionuclide activities released per stack. Another reason for the disparity is the fact that the MEI dose includes both inhalation and ingestion pathways.

**Table 2. Maximum Predicted Airborne Concentrations at or Beyond the Site Boundary**

| Maximum Predicted Airborne Concentrations at or Beyond the Site Boundary |                                |                        |           |   |   |
|--|--------------------------------|------------------------|-----------|---|---|
| Nuclide  | Maximum Concentration (µCi/mL) | Concentration Location |           | 10 CFR-20, App. B, Table 2, Col. 1 Value (µCi/mL) | Ratio of Maximum Concentration to 10 CFR-20 Value |
|  |                                | Sector                 | Dist. (m) |   |   |
| <sup>99</sup> Tc   | 2.1E-17                        | NNE                    | 400       | 9.E-10  | 2.3E-08   |
| <sup>228</sup> Th  | 5.8E-20                        | NNE                    | 350       | 2.E-14  | 2.9E-06   |
| <sup>230</sup> Th  | 5.8E-20                        | NNE                    | 350       | 2.E-14  | 2.9E-06   |
| <sup>231</sup> Th  | 1.9E-19                        | NNE                    | 350       | 9.E-09  | 2.1E-11   |
| <sup>232</sup> Th  | 5.7E-20                        | NNE                    | 350       | 4.E-15  | 1.4E-05   |
| <sup>234</sup> U   | 1.1E-17                        | NNE                    | 400       | 5.E-14  | 2.2E-04   |
| <sup>235</sup> U   | 2.7E-19                        | NNE                    | 450       | 6.E-14  | 4.5E-06   |
| <sup>238</sup> U   | 5.3E-20                        | NNE                    | 400       | 6.E-14  | 8.8E-07   |
| <sup>238</sup> Pu  | 7.4E-21                        | NNE                    | 200       | 2.E-14  | 3.7E-07   |
| <sup>239</sup> Pu  | 6.2E-20                        | NNE                    | 200       | 2.E-14  | 3.1E-06   |
| <sup>240</sup> Pu  | 2.2E-20                        | NNE                    | 200       | 2.E-14  | 1.1E-06   |
| <sup>241</sup> Pu  | 1.1E-18                        | NNE                    | 200       | 8.E-13  | 1.4E-06   |
| <sup>241</sup> Am  | 3.7E-20                        | NNE                    | 200       | 2.E-14  | 1.9E-06   |
| <b>Sum of Fractions:</b>   |                                |                        |           |   | <b>2.5E-04</b>                                    |