

# FORD 1

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SUBJECT: Forwards response to NRC questions needed to be addressed in order to complete review of licensee request for alternate disposal of very low level radioactive mats from plant.

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October 17, 1991

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Disposal of Low Level Radioactive Material

- References:
- 1) Letter from K.H.Evers to Document Control Desk dated September 12, 1989
  - 2) Letter from M.J.Davis to K.H.Evers dated February 13, 1990
  - 3) Letter from L.Sridharon (WDNR) to M.Vandenbusch dated June 13, 1991

In reference 1, pursuant to the regulation of 10 CFR 20.302, Wisconsin Public Service Corporation (WPSC) requested authorization for the alternative disposal of very-low-level radioactive materials from the Kewaunee Nuclear Power Plant. In reference 2, the US NRC identified additional questions that needed to be addressed in order to complete their review. Attachment 1 provides our response to the questions.

WPSC requested the State of Wisconsin Department of Natural Resources (WDNR) to review the disposal options for the service water pretreatment lagoon sludges. In reference 3, the WDNR completed a review of the most appropriate on site disposal methods for the slightly contaminated service water pretreatment lagoon sludges. The two proposed methods that the WDNR evaluated included in-situ capping of the sludge in the wastewater treatment lagoon and on site landspreading. In Attachment 1, Appendix A, WPSC evaluated the on site landspreading

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application which is our preferred disposal method. WPSC does not intend to utilize the in-situ capping of the sludge in the lagoon at this time. However, in the letter the WDNR agreed that either disposal method was acceptable provided:

- if the material is to be left in the lagoon, it would be capped in accordance with Wisconsin State statutes.
- if the on site landspreading option is utilized, the material would be spread by either disking into the soil or by spiking into the ground.

WPSC will abide by the WDNR landspreading requirements which include locational and performance standards. Should there be any additional questions please feel free to contact a member of my staff.

Sincerely,



C. A. Schrock  
Manager - Nuclear Engineering

DJM/jms

Attach.

cc - US NRC - Region III  
Mr. Patrick Castleman, US NRC

LIC\DJM\N492

ATTACHMENT 1

To

Letter from K. H. Evers (WPSC) to Document Control Desk (NRC)

Dated

October 17, 1991

- References 1) Letter from K. H. Evers to Document Control Desk dated September 1, 1989.

**NRC Question #1**

On page 4 of your submittal, the average input to the Sewage Treatment System is approximately 11,000 gallons per day. In the Final Environmental Statement, this system is to be operated below its design capacity of 9,000 gallons per day. Discuss this deviation from the design capacity, and provide information to justify the higher output for this system.

**WPSC Response**

The original Sewage Treatment System installed at the Kewaunee Nuclear Power Plant (KNPP) was replaced in 1986 with a higher capacity system. The original system was designed for an onsite work force of around 150 people. It was a limited capacity aerobic treatment system which included the onsite lagoon for additional retention. Because of this limited capacity and more stringent conditions on system effluent to Lake Michigan, an aerobic digester system was installed, which has a higher capacity, and uses current technology.

The estimated input volume to the Sewage Treatment System used in the September 12, 1989 application was 11,000 gallons per day. This value was based on past operating data. The increase in influent from the original design basis included in the Final Environmental Statement is due mainly to an increase in the number of individuals and facilities (e.g., training and simulator building) located onsite. Design changes to the system were required to accommodate these new facilities.

The current volumes of sewage sludge were used as the basis for the potential dose analysis and corresponding radionuclide concentration limits. This increase has no significant effect on the dose modeling. (Refer to the response to NRC Question #2, below.)

#### **NRC Question #2**

Provide information regarding how the disposal plan assures that the annual dose to any exposed individual will be kept below 1 mrem per year.

#### **WPSC Response**

The dose pathway modeling used for determining the radioactive material concentration limits was based on NRC modeling. The computer code IMPACTS-BRC was used as the basis for calculating the potential doses from the alternative disposal methods. This modeling includes reasonable conservative exposure pathway scenarios for the various disposal methods.

Administrative controls will be established to ensure that the actual disposal of any slightly contaminated materials from KNPP are within the bounds of the evaluation. Samples from each of the waste streams will be collected and analyzed by gamma spectroscopy prior to release for disposal. A system lower limit of detection (LLD) of  $5E-07 \mu\text{Ci/ml}$  for the principal gamma emitting radionuclides will be required. This LLD ensures the identification of any contaminated materials at a fraction of the allowable concentration limits for the alternative disposal.

The results of these analyses will be used to ensure that any detectable levels of radioactive material are within the limits for alternative disposal. Any materials with levels of radioactive material above the concentration limits

(and of plant origin) will be treated as a radioactive waste and appropriately controlled.

Records will be maintained to ensure that the cumulative disposal of any contaminated materials are maintained within the bounds of the evaluation. In addition to a comparison of the individual radionuclide concentration limits, a record of the total amount of radioactive material disposed of will be maintained. Cumulative totals will be maintained to ensure that the total activity does not exceed the quantity assumed in the derivation of the limits.

In developing the concentration limits presented in Table 1 of reference 1, it was assumed the total annual design basis volume of 27,000 ft<sup>3</sup> would be contaminated at the derived limit. The dose commitment from each radionuclide was individually evaluated as if it were the only radioactive material present. To determine if a mixture of radionuclides meets the limit, the sum-of-the-fractions rule should be applied (i.e., the sum of each radionuclide's concentration divided by its limiting concentration must be less than one).

The concentration limits of Table 1 of reference 1 also have an implied total activity limit. This limit is determined by multiplying the individual radionuclide concentration limit by the total estimated waste volume of 27,000 ft<sup>3</sup>. These total activity limits are presented in Table A of this response, for each radionuclide individually. For a mixture of radionuclides, a total annual activity limit may be determined by normalizing the concentrations so that the sum-of-the-fractions for the mixture equals one (1). These resultant adjusted concentrations may be multiplied by the 27,000 ft<sup>3</sup> waste volume to determine the corresponding total activity limit of the mixture.

A Disposal Log will be maintained on a calendar year basis for all disposals of any very-low-level radioactive materials. The log will contain as a minimum the following information:

- Disposal location
- Description of waste
- Shipment/disposal date
- Waste volume
- Radionuclide concentrations (gamma emitters)
- Year-to-date radionuclide activity
- Year-to-date waste volume

In addition to the above Disposal Log, a record file will be kept for each individual disposal. This file will contain, as a minimum, the following information:

- Waste identification
- Sample gamma spectroscopy results
- Identified radionuclide concentrations and total activity

### **NRC Question #3**

Revise Appendix B, Section A of your submittal, "Radiation Exposure During Transport," by adding the cumulative dose to the exposed population per reactor year for both the transportation worker and the general public (onlookers along route).

### **WPSC Response**

The potential exposure to the general public (onlookers along route) is modeled by the IMPACTS-BRC code. As addressed in NUREG/CR-3585, this modeling is based on an integration of the source strength, an assumed

population density along route and vehicular speed. For a conservative evaluation of the potential exposure to the general public from the transport of the KNPP waste, a population density of 610 persons/mi<sup>2</sup> was assumed. This value is conservative for the KNPP site area where the average population density is less than 53 persons/mi<sup>2</sup>. A transport distance of 45 miles was assumed. The IMPACTS-BRC modeling assumes five (5) tons of material are transported per shipment. For the assumed KNPP waste volume, this shipment weight translates into a total of 167 shipments per year. With a vehicular speed of 20 miles per hour, the resultant total population exposure time is 375 person-hours per year. At the concentration limits established for the alternative disposal, the potential onlooker doses during transport will be less than 0.01 person-rem per year. For the modeling of the exposure to the transport worker, the IMPACTS-BRC model assumes two drivers per vehicle. As presented in the September 12, 1989 submittal, the maximum dose to the driver is less than 1 mrem per year (<0.001 rem/yr). Therefore, the total collective dose to the transport workers will be twice the individual dose, i.e., less than 0.002 person-rem. Including the population dose of <0.01 person-rem per year, the total collective dose to both the transport workers and the population is less than 0.02 person-rem (0.002 person-rem + 0.01 person-rem < 0.02 person-rem).

For the disposal of the existing 15,000 ft<sup>3</sup> of contaminated sludges, the population dose due to the transportation of the waste is calculated to be 0.0002 person-rem. The estimated collective exposure to the transport worker is 0.00007 person-rem. The total collective dose due to transport of the waste is 0.00027 person-rem.

### **Additional Potential Disposal Method**

The Wisconsin Department of Natural Resources has requested Wisconsin Public Service to examine the feasibility of land application of the lagoon sludges in lieu of disposal in the Kewaunee County Landfill. Land application is also an option for the disposal of the sewage sludges. Therefore, WPS requests that the option for onsite disposal at the KNPP site by land application be included in the alternative disposal methods which was determined to be acceptable in our September 12, 1989 submittal.

The potential pathways of exposure as evaluated in the September 12, 1989 submittal conservatively bound any additional pathways of exposure that would result from onsite land spreading of the waste. Attachment A to this response provides an overview of the land spreading disposal method. Also, the pathways of exposure applicable to the onsite land application are evaluated; and a comparison to the controlling pathways and radionuclide concentrations as presented in the September 12, 1989 submittal are discussed. From a modeling standpoint, the two exposure scenarios, "Radiation Exposure During Transport" and "Radiation Exposure to Landfill Operator," appropriately characterize any potential exposure to workers involved with the land spreading of the waste. The other post-disposal exposure scenarios, "Intruder Scenario", "Intruder Well", and "Exposed Waste Scenario," as described in NUREG/CR-3585 (and as discussed in Appendix C of the submittal) reasonably bound any potential exposures from either ground waste migration or post-release from the Kewaunee site. In no case is there a higher potential for exposure from land application than the pathways and potential exposures that were used for the derivation of the limits for alternative disposal. Therefore, no revisions are needed to the radionuclide concentration limits proposed in the September 12, 1989 submittal to include the option for disposal by onsite land spreading of the waste.

**Table A**  
**Radionuclide Quantity Limits**  
**for Alternative Disposal**

Nuclide	Limiting Concentration ( $\mu\text{Ci/ml}$ )	Limiting Annual Quantity (Ci)
H-3	9.65E-04	0.7382
C-14	4.55E-05	0.0348
Cr-51	3.13E-04	0.2394
Mn-54	1.14E-05	0.0087
Fe-55	1.00E-02	7.6500
Fe-59	7.90E-06	0.0060
Co-58	1.16E-05	0.0089
Co-60	3.74E-06	0.0029
Ni-63	1.00E-02	7.6500
Sr-90	3.45E-03	2.6393
Zr-95	6.28E-06	0.0048
Nb-95	1.23E-05	0.0094
Mo-99	6.73E-05	0.0515
Tc-99	2.70E-04	0.2066
I-129	2.50E-06	0.0019
I-131	2.68E-05	0.0205
Cs-134	6.16E-06	0.0047
Cs-137	1.71E-05	0.0131
Ba-140	5.52E-05	0.0422
La-140	4.17E-06	0.0032
Transuranics		
TRU ( $T_{1/2} > 5$ yrs)	8.91E-05	0.0682
Pu-241	2.85E-03	2.1803
Cm-242	1.00E-02	7.6500

Assumes annual quantity of KNPP wastes is 27,000 ft<sup>3</sup> or 7.65E8 mls.

## Appendix A

### Evaluation of Onsite Land Application for Alternative Disposal of Very-Low-Level Contaminated Materials

#### **Overview**

Land spreading of lagoon sludges onsite at the Kewaunee Nuclear Power Plant has been recommended by personnel from the Wisconsin Department of Natural Resources (DNR) as a desirable alternative to the use of the Kewaunee County Landfill for disposal. This method of disposal is also a recommended practice for disposing of sewage treatment facility sludges. Therefore, WPS requests that this disposal method be included in the options available for the alternative disposal of very-low-level radioactively contaminated materials from KNPP.

#### **Description of Disposal Method**

The disposal of KNPP sludges will be performed by beneficial land application to a dedicated disposal area located onsite at the Kewaunee Nuclear Power Plant. Typical methods of land spreading will be employed. KNPP sludges will be loaded onto appropriate vehicles (e.g., tanker truck, sludge spreader, etc.) and applied to the dedicated disposal area. The dedicated disposal area will be periodically plowed to a depth of 6 inches.

Onsite disposal of water treatment and sewage sludges are allowed by EPA and State of Wisconsin Department of Natural Resources with the criteria and limits for land spreading being specified by the potential use of the land. The two land use criteria are 1) Agricultural land that covers any lands upon which food crops are grown or animals are grazed for human consumption, and 2) Non-Agricultural land that covers lands which do not represent ingestion pathways to man. To be conservative, the Agricultural Land Application limits of sludge contaminants will be applied to the KNPP wastes even though the less restrictive Non-Agricultural Land Application sludge contamination limits are allowed. Therefore, no more than 50 metric tons of sludge per hectare will be applied to the dedicated disposal site. This limit will ensure that any land application will not exceed the bounds of the dose analysis as

performed previously. In addition, other limitations as applied to land application by the State of Wisconsin Department of Natural Resources will be followed (e.g., control of runoff/erosion, proximity to wells/residences/surface water, etc.).

### **Applicable Pathways of Exposure**

The pathways of exposure applicable for land spreading are not appreciably different from the pathways evaluated for the disposal methods at the Kewaunee County Landfill or the Green Bay Metropolitan Sewerage District facilities. The major exposure pathways are discussed below:

#### **Direct Exposure to Workers**

Any potential exposures to workers involved in the removal, transport and land spreading of the sludges are reasonably bound by the evaluation of the exposure to the transport worker in the September 12, 1989 submittal. The transport worker has been assumed to be exposed for 460 hours per year at one (1) meter from unshielded waste. For the land spreading of these wastes, it is estimated that the total exposure time for the removal and disposal of the lagoon sludges will require no longer than a three week period per year (i.e., 120 hours).

The potential exposure to a worker onsite after land spreading, has been estimated at no more that 100 hours per year. Such an individual would be involved in land maintenance activities, such as plowing and mowing. As modeled in the September 12, 1989 submittal, an exposure of 2000 hours per year to the landfill operator has been assumed. For this exposure, the KNPP materials are mixed with other landfill waste: a 1:13 mixing of KNPP materials to other waste is assumed. This mixing is not significantly different from the type of mixing that will occur in the field with the sludges being

plowed into the soil to a depth of six (6) inches. With a land spreading of 50 metric tons per hectare per year, a mixing ratio of 1:30 will be achieved. Therefore, the resultant dose to the exposed worker would be less than the 1 mrem per year dose to the transport worker as evaluated in the September 12, 1989 submittal.

### **Post Disposal Exposure - Intruder Scenario**

The IMPACTS-BRC model, as applied to the disposal of the KNPP waste, assumes a loss of institutional controls 10 years after closure of the site (See Appendix B of the September 12, 1989 submittal). An individual is assumed to reside in a house built on the disposal area. This individual receives a direct exposure (from the uncovered waste), an inhalation exposure (from resuspension), and an ingestion exposure (from growing 1/2 of his food crops). For modeling purposes, it is assumed that the waste is mixed at a ratio of 1:13 with other soils during the resident's construction process.

The onsite land application of KNPP waste will be limited by the Agricultural Land Application sludge concentrations even though the less restrictive Non-Agricultural Land Application sludge concentrations are applicable since a "dedicated land disposal" site will be used (i.e., no crops will be grown on the disposal site). Therefore, provided the KNPP waste does not exceed the Non-Agricultural maximum sludge concentrations for heavy metal or organic chemicals, unlimited application of waste to the dedicated land disposal site is allowed. However, to be conservative, the land application of KNPP wastes will be limited to 5 metric tons per hectare per year. The intruder scenario as evaluated in the September 12, 1989 submittal conservatively bounds this exposure pathway for the on-site land spreading.

### **Post Disposal - Intruder Well**

The intruder well pathway for onsite land disposal is essentially the same as the intruder well pathway as evaluated by the IMPACTS-BRC model. It is conservatively assumed that the well is located at the edge of the disposal site. As modeled, locating the well at the disposal site edge in "downstream flow" direction maximizes the calculated hypothetical dose. (Additional discussion of this modeling is presented in NUREG/CR-3585, Volume 2).

The potential dose for the intruder well scenario for the land spreading disposal would be less than 0.001 mrem per year. The modeling as presented in the September 12, 1989 submittal reasonably bounds any hypothetical well water exposure pathway.

In summary, the modeling of the exposure scenarios, as presented in the September 12, 1989 submittal, conservatively bounds the hypothetically exposures for the on-site land spreading. In no case is it likely that any individual, either on-site or off-site, will receive a dose in excess of 1 mrem per year from the disposal of the slightly contaminated materials.