

PrairieIslandISFSIPem Resource

From: Trefethen, Jean
Sent: Thursday, October 02, 2014 10:50 AM
To: Nguyen, John-Chau
Subject: FW: Finally : the cement studies referenced in the comments to the EA for PINGP.
Attachments: Appendix K.PDF

From: Tom Harlan [mailto:harlan@mdh-law.com]
Sent: Tuesday, September 23, 2014 1:51 PM
To: Trefethen, Jean
Cc: Bianca Chance
Subject: Finally : the cement studies referenced in the comments to the EA for PINGP.

Jean-

The email below to you bounced back because it was too large (too many attachments). So I am going break this up into 4 separate emails, this being the first of four. Thanks and let us know what other information you may need outside of what we have addressed below.

TH

Jean-

Sorry for the delay in getting back to you regarding the information on the concrete studies you requested. We had to look through a number of different files and documents to locate the requested studies. We have located, and I am attaching, two of the reports. These are briefly discussed below. In addition to these reports, there is one more that we need to locate.

Regardless, the two reports that are attached address the degradation of concrete used for the storage (or proposed storage) of spent nuclear fuel and high-level waste. These reports were referenced in an exhibit to the Monticello Certificate of Need for a License to establish an ISFISI but not in that exhibit itself. Regretfully, that exhibit itself was destroyed and, thus, the long time to locate the source of reference and the documents as well.

At the outset, it is referenced, and discussed in passing, in Appendix K to the Yucca Mountain EIS. For your reference, I am attaching Appendix K.

In Appendix K, there are three reports that discuss the degradation of concrete in and around Prairie Island (and Monticello) as well as what is identified (in one report) by the authors of those reports as Region 3. Two of these reports, which are attached, address this generally as follows:

1. The first study is called Documentation of National Weather Conditions Affecting Long-Term Degradation of Commercial Spent Fuel and DOE Spent Fuel and High-Level Waste. It is a 1998 study/report by W. Lee Poe Jr. and Paul F. Wise. Section 2.0 of this report references the Concrete Storage Model Degradation with the sub-parts detailing the conclusion that the freeze/thaw cycle is the most harmful and the quickest form of degradation to above ground cement storage modules. In Table 2-1, St. Cloud is referenced with an indication that there will be a roof collapse, as that term is defined in the report within 81 years. Note that later, in Table 2-2, page 11-13, that reference is made to Prairie Island and that the expected roof collapse is 84 years.

2. The second study is called Regional Binning for Continued Storage of Spent Nuclear Fuel and High-Level Wastes. It is a 1998 study/report conducted by W. Lee Poe, Jr. Section 1.3 analyzes the impacts of regional environmental conditions (weather) that are significant to the useful life of concrete used to store the SNF or HLW. Region 3, which is the region that Prairie Island is located, has an average concrete life of 72 years (mostly impacted by what appears to be the storage facilities on the Great Lakes). I would draw your attention to Table A.1.3-3, which breaks out the proposed or potential storage facilities in Region 3. Prairie Island is about 2/3rds of the way down on that chart, showing a useful life of concrete as being 87 years. I am not sure why there is a difference between the report referenced above and this report. Regardless, it illustrates that the useful life of the concrete storage facility is less than 100 years. It also illustrates that Prairie Island is one of the lowest in terms of useful life for concrete.

In addition to these reports, we are still trying to locate on more report: Long-Term Degradation of Concrete Facilities Presently Used for Storage of Spent Nuclear Fuel and High-Level Waste. This is a 1998 study/report by W. Lee Poe, Jr.. It is a revised report that is referenced in Appendix K so we will be looking for both the original and revised. Since at the time this report was commissioned, HT-40s were already being used for storage at Prairie Island, this will be an interesting report to review and see if it provides any value.

Finally, I am providing to you a portion of the Draft EIS that was conducted by the Minnesota Department of Commerce for the licensing of the Monticello storage facilities. I direct your attention to Section 5.3, on page 37 of the attached document. There, the Draft EIS references the "design lifetime of the cask storage system" identifying it as 60 years. Two points, first, this comment was for, some reason, deleted from the final EIS. Second, while this is not the same storage system as Prairie Island, it was chose by Xcel based on its experience. Why? Was the TN-40 less durable or robust or about the same? If more durable, then why not chosen?

We will continue to look for the Long-Term Degradation report and will provide that to you as soon as we can locate it. Thanks for your patience and feel free to contact Bianca or I if there is more information that you need. Thank you for the work that you are doing.

Regards

TH

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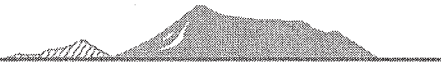
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Appendix K

Long-Term Radiological Impact
Analysis for the No-Action
Alternative

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APPENDIX K. LONG-TERM RADIOLOGICAL IMPACT ANALYSIS FOR THE NO-ACTION ALTERNATIVE

K.1 Introduction

This appendix provides detailed information related to the radiological impact analysis for No-Action Alternative Scenario 2, including descriptions of the conceptual models used for facility degradation, spent nuclear fuel and high-level radioactive waste material degradation, and data input parameters. In addition, this appendix discusses the computer programs and exposure calculations used. The methods described include summaries of models and programs used for radioactive material release, environmental transport, radiation dose, and radiological human health impact assessment. Although the appendix describes No-Action Scenario 1, it focuses primarily on the long-term (100 to 10,000 years) radiological impacts associated with Scenario 2.

NO-ACTION ALTERNATIVE SCENARIOS 1 AND 2

Under the Nuclear Waste Policy Act, the Federal Government has the responsibility to provide permanent disposal of spent nuclear fuel and high-level radioactive waste to protect the public's health and safety and the environment. DOE intends to comply with the terms of existing consent orders and compliance agreements on the management of spent nuclear fuel and high-level radioactive waste. However, the course that Congress, DOE, and the commercial nuclear utilities would take if there was no recommendation to use Yucca Mountain as a repository is highly uncertain.

In light of these uncertainties, it would be speculative to attempt to predict precise consequences. To illustrate one set of possibilities, however, DOE decided to focus the analysis of the No-Action Alternative on the potential impacts of two scenarios:

Scenario 1: Long-term storage of spent nuclear fuel and high-level radioactive waste at the current storage sites, with effective institutional control for at least 10,000 years.

Scenario 2: Long-term storage of spent nuclear fuel and high-level radioactive waste, with the assumption of no effective institutional control after approximately 100 years.

DOE recognizes that neither of these scenarios is likely to occur if there was a decision to not develop a repository at Yucca Mountain. However, the Department selected these two scenarios for analysis because they provide a baseline for comparison to the impacts from the Proposed Action and because they reflect a range of the potential impacts that could occur.

To permit a comparison of the impacts between the construction, operation and monitoring, and eventual closure of a proposed repository at Yucca Mountain and No-Action Scenario 2, the U.S. Department of Energy (DOE) took care to maintain consistency, where possible, with the modeling techniques used to conduct the *Viability Assessment of a Repository at Yucca Mountain* (DIRS 101779-DOE 1998, all) and in the *Total System Performance Assessment – Viability Assessment (TSPA-VA) Analyses Technical Basis Document* (DIRS 100355, 100356, 100357, 100358, 100359, 100362, 100364, 100365, 100366, 100369, 100371-CRWMS M&O 1998, all) for the proposed repository (see Appendix I, Section I.1, for details). In pursuit of this goal, DOE structured this analysis to facilitate an impact comparison with the repository impact analysis. Important consistencies include the following:

- Identical evaluation periods (100 years and 10,000 years)

- Identical spent nuclear fuel and high-level radioactive waste inventories at the reference repository:

- Proposed Action: 63,000 metric tons of heavy metal (MTHM) of commercial spent nuclear fuel; 2,333 MTHM of DOE spent nuclear fuel; 8,315 canisters of high-level radioactive waste. This inventory includes an amount of surplus weapons-usable plutonium

- Module 1: All Proposed Action materials, plus an additional 42,000 MTHM of commercial spent nuclear fuel; 167 MTHM of DOE spent nuclear fuel; and 13,965 canisters of high-level radioactive waste. This would result in a total of approximately 105,000 MTHM of commercial spent nuclear fuel; 2,500 MTHM of DOE spent nuclear fuel; and 22,280 canisters of high-level radioactive waste. This inventory also includes the surplus weapons-usable plutonium (see Appendix A, Figure A-2)

**DEFINITION OF
METRIC TONS OF HEAVY METAL**

Quantities of spent nuclear fuel are traditionally expressed in terms of *metric tons of heavy metal* (typically uranium), without the inclusion of other materials such as cladding (the tubes containing the fuel) and structural materials. A metric ton is 1,000 kilograms (1.1 tons or 2,200 pounds). Uranium and other metals in spent nuclear fuel (such as thorium and plutonium) are called *heavy metals* because they are extremely dense; that is, they have high weights per unit volume. One metric ton of heavy metal disposed of as spent nuclear fuel would fill a space approximately the size of a typical household refrigerator.

- Consistent spent nuclear fuel and high-level radioactive waste corrosion and dissolution models
- Identical radiation dose and risk conversion factors
- Similar assumptions regarding the future habits and behaviors of population groups (that is, that they will not be much different from those of populations today)

Since issuing the Draft EIS, DOE has continued to evaluate design features and operating modes that would improve long-term repository performance and reduce uncertainty. The result of the design evolution process was the development of the flexible design (DIRS 153849-DOE 2001, all), which was evaluated in the Supplement to the Draft EIS. This design focuses on controlling the temperature of the rock between waste emplacement drifts. As a result of these design changes, this Final EIS evaluates a range of repository operating modes (higher- and lower-temperature). The lower-temperature operating mode has the flexibility to remain open and under active institutional control for up to 300 years after emplacement. Although Chapter 4 of this EIS includes an evaluation of impacts for this period, DOE did not evaluate the 300-year institutional control case for the No-Action Alternative. The primary reason for not updating this part of the analysis was because if the institutional control period for the analysis of the No-Action Alternative were extended to 300 years, the short-term environmental impacts would have increased by as much as 3 times. DOE did not want to appear to overstate the impacts from the No-Action Alternative.

Since the publication of the Draft EIS, DOE modified the spent nuclear fuel cladding corrosion rates and failure mechanisms used in the performance analysis in Chapter 5 of the Final EIS. DOE did not update these models for the No-Action Alternative Scenario 2 analysis because the outcome would have been an increase in the long-term radiation doses and potential health impacts, however, the increase would be within the uncertainties discussed in Section K.4. In addition, the radionuclide inventories for commercial spent nuclear fuel were updated for the Final EIS (see Appendix A, Tables A-8 and A-9) to reflect the higher initial enrichments and burnup projected for commercial nuclear facilities. Although these revised inventories were used to estimate potential short-term repository impacts in the Final EIS

(Chapter 4), DOE chose not to update the No-Action inventories because, again, the effect on the outcome would be about a 15-percent increase in health impacts in this chapter.

Affected populations for the No-Action Alternative were, in general, based on 1990 census estimates and not projected to 2035 as was done for the Proposed Action. However, if the population across the Nation had been projected to 2035, the collective impacts resulting from radiation exposure would have increased by less than a factor of 1.5, which is the average expected increase in national population from 1990 to 2035 (DIRS 152471-Bureau of the Census 2000, all).

For commercial facilities, the No-Action analysis estimated short- and long-term radiological impacts for Scenario 1 and short-term impacts for Scenario 2 during the first 100 years for facility workers and the public based on values provided by the U.S. Nuclear Regulatory Commission (DIRS 101898-NRC 1991, p. 21). For DOE facilities, radiological impacts for these periods under Scenarios 1 and 2 were estimated based on analysis by Orthen (DIRS 104596-Orthen 1999, all). To ensure consistency with the repository impact analysis, the long-term facility degradation and environmental releases of radioactive materials were estimated by adapting TSPA-VA process models developed to predict the behavior of spent nuclear fuel and high-level radioactive waste in the repository (DIRS 104597-Battelle 1998, pp. 2.4 to 2.9).

Because DOE did not want to influence the results to favor the repository, it used assumptions that generally resulted in lower predicted impacts (rather than applying the bounding assumptions used in many of the repository impact analyses) if TSPA-VA models were not available or not appropriate for this continuous storage analysis. For example, the No-Action Scenario 2 analysis took into account the protectiveness of the stainless-steel waste canister when estimating releases of radioactive material from the vitrified high-level radioactive waste; the TSPA-VA assumed no credit for material protection or radionuclide retardation by the intact canister. This approach dramatically reduced the release rate of high-level radioactive waste materials to the environment, thereby resulting in lower estimated total doses and dose rates to the exposed populations. Conversely, in many instances the TSPA-VA selected values for input parameters that defined ranges to ensure that there would be no underestimation of the associated impacts. Section K.4 discusses other consistencies and inconsistencies between the TSPA-VA and the No-Action analysis.

The long-term impact analysis used recent climate and meteorological data, assuming they would remain constant throughout the evaluation period (DIRS 101912-Poe and Wise 1998, all). DOE recognizes that there could be considerable changes in the climate over 10,000 years (precipitation patterns, ice ages, global warming, etc.) but, to simplify the analysis, did not attempt to quantify climate changes. Section K.4.1.2 discusses the difficulties of modeling these changes and the potential effect on outcomes resulting from uncertainties associated with predicting potential future climatic conditions.

Although the repository TSPA-VA used probabilistic process models to evaluate the transport of radioactive materials within Yucca Mountain and underlying groundwater aquifers, DOE used the deterministic computer program Multimedia Environmental Pollutant Assessment System (MEPAS; DIRS 101533-Buck et al. 1995, all) for the No-Action Scenario 2 analysis because of the need to model the transport of radioactive material. In addition, it discusses environmental pathways not present at the repository (for example, the movement of contaminants through surface water). The MEPAS program has been accepted and used by DOE and the Environmental Protection Agency for long-term performance assessments (DIRS 101917-Rollins 1998, pp. 1, 10, and 19).

K.2 Analytical Methods

This section describes the methodology used to evaluate the long-term degradation of the concrete facilities, steel storage containers, and spent nuclear fuel and high-level radioactive waste materials. In addition, it discusses the eventual release and transport of radioactive materials under Scenario 2. The

PROBABILISTIC AND DETERMINISTIC ANALYSES

A *probabilistic* analysis represents data input to a model as a range of values that represents the uncertainty associated with the actual or true value. The probabilistic model randomly samples these input parameter distributions many times to develop a possible range of results. The range of results provides a quantitative estimate of the uncertainty of the results.

A *deterministic* analysis uses a best estimate single value for each model input and produces a single result. The deterministic analysis will usually include a separate analysis that addresses the uncertainty associated with each input and provides an assessment of impact these uncertainties could have on the model results.

Analyses can use both approaches to provide similar information regarding the uncertainty of the results.

institutional control assumed under Scenario 1 would ensure ongoing maintenance, repair and replacement of storage facilities, and containment of spent nuclear fuel and high-level radioactive waste. For this reason, assuming the degradation of engineered barriers and the release and transport of radioactive materials is not appropriate for Scenario 1. The Scenario 2 analysis assumed that the degradation process would begin at the time when there was no effective institutional control (that is, after approximately 100 years) and the facilities would no longer be maintained. This section also describes the models and assumptions used to evaluate human exposures and potential health effects, and cost impacts.

K.2.1 GENERAL METHODOLOGY

For the No-Action analysis, the facilities, dry storage canisters, cladding, spent nuclear fuel, and high-level radioactive waste material, collectively known as the *engineered barrier system*, were modeled using an approach consistent (to the extent possible) with that developed for the Viability Assessment (DIRS

101779-DOE 1998, Volume 3). These process models were developed to evaluate, among other things, the performance of the repository engineered barrier system in the underground repository environment. In this analysis, the process models were adapted whenever feasible to evaluate surface environmental conditions at commercial and DOE sites. These models are described below.

Figure K-1 shows the modeling of the degradation of spent nuclear fuel and high-level radioactive waste and the release of radioactive materials over long periods. Five steps describe the process of spent nuclear fuel and high-level radioactive waste degradation; a sixth step, facility radioactive material release, describes the amount and rate of precipitation that would transport the radioactive material or *dissolution products* to the environment. This section describes each process and the results. Additional details are provided in reference documents (DIRS 101910-Poe 1998, all; DIRS 104597-Battelle 1998, all).

Environmental parameters important to the degradation processes include temperature, relative humidity, precipitation chemistry (pH and chemical composition), precipitation rates, number of rain-days, and freeze/thaw cycles. Other parameters considered in the degradation process describe the characteristics and behavior of the engineered barrier system, including barrier material composition and thickness. To simplify the analysis, the United States was divided into five regions (as shown in Figure K-2) for the purposes of estimating degradation rates and human health impacts (see Section K.2.1.6 for additional details).

Under the No-Action Alternative, commercial utilities would manage their spent nuclear fuel at 72 nuclear power generating facilities. DOE would manage its spent nuclear fuel and high-level radioactive waste at five DOE facilities [the Hanford Site (Region 5), the Idaho National Engineering and Environmental Laboratory (Region 5), Fort St. Vrain (Region 5), the West Valley Demonstration Project (Region 1), and the Savannah River Site (Region 2)]. The No-Action analysis evaluated DOE spent

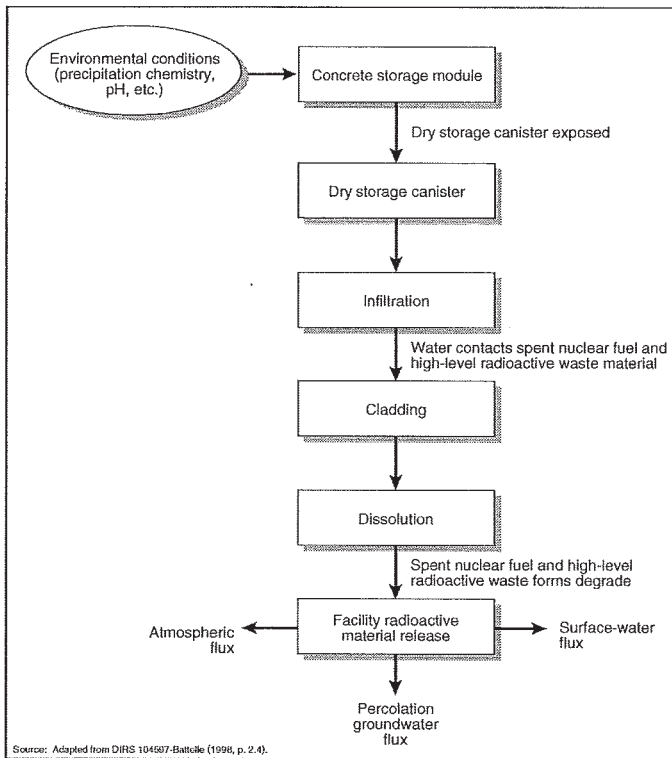
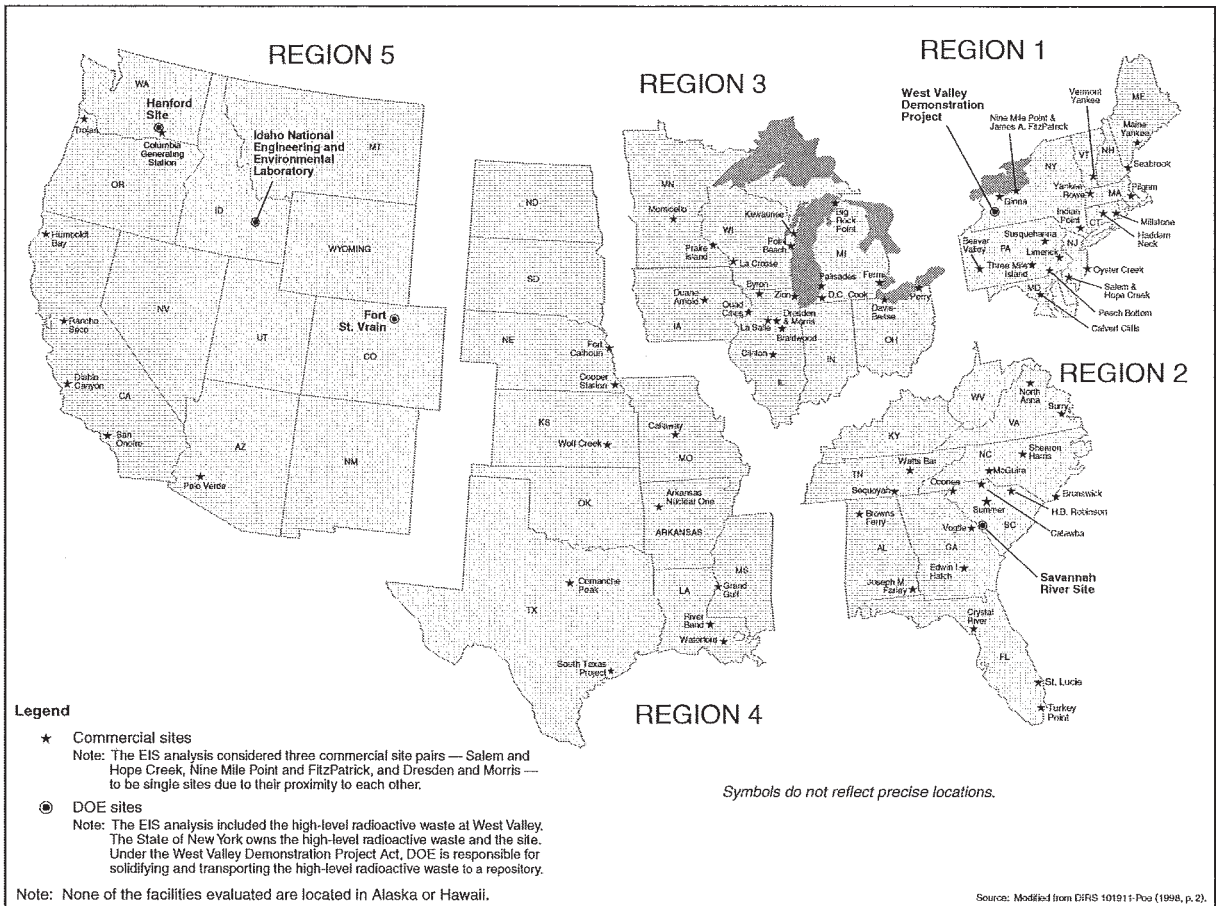


Figure K-1. Primary steps and processes involved in the degradation of the engineered barrier system.

nuclear fuel and high-level radioactive waste at the commercial and DOE sites or at locations where Records of Decision have placed or will place these materials (for example, West Valley Demonstration Project spent nuclear fuel was evaluated at the Idaho National Engineering and Environmental Laboratory (60 FR 28680, June 1, 1995). Therefore, the No-Action analysis evaluated DOE aluminum-clad spent nuclear fuel at the Savannah River Site and DOE non-aluminum-clad fuel at the Idaho National Engineering and Environmental Laboratory. DOE evaluated most of the Fort St. Vrain spent nuclear fuel at the Colorado site. In addition, the analysis evaluated high-level radioactive waste at the West Valley Demonstration Project, the Idaho National Engineering and Environmental Laboratory, the Hanford Site, and the Savannah River Site.

K.2.1.1 Concrete Storage Module Degradation

The first process model analyzed degradation mechanisms related to failure of the concrete storage module. *Failure* is defined as the time when precipitation would infiltrate the concrete and reach the spent nuclear fuel or high-level radioactive waste storage canister. The analysis (DIRS 101910-Poe 1998, Section 2.0) considered degradation due to exposure to the surrounding environment.



K-6

Figure K-2. No-Action Alternative analysis regions.

The primary cause of failure of surface-mounted concrete structures is freeze/thaw cycles that cause the concrete to crack and spall (break off in layers), which allows precipitation to enter the concrete, causing more freeze damage. *Freeze/thaw failure* is defined as the time when half of the thickness of the concrete is cracked and spalled. Some regions (coastal California, Texas, Florida, etc.) are essentially without the freeze/thaw cycle. In these locations the primary failure mechanism is precipitation containing chlorides, which decompose the chemical constituents of the concrete into sand-like materials. This process progresses more slowly than the freeze/thaw process. Figure K-3 shows estimated concrete storage module failure times.

Below-grade concrete structures, such as those used to store some of the DOE spent nuclear fuel and most of the high-level radioactive waste, would be affected by the same concrete degradation mechanisms as surface facilities. Below grade, the freeze/thaw degradation would not be as great because the soil would moderate temperature fluctuations. The primary failure mechanism for below-grade facilities would be the loss of the above-grade roof, which would result in precipitation seeping around shield plugs. The analysis assumed that this would occur 50 years after the end of facility maintenance, and that this would be the reasonable life expectancy of a facility without maintenance and periodic repair (DIRS 101910-Poe 1998, pp. 4-6 to 4-19).

K.2.1.2 Storage Canister Degradation

The second process analyzed was spent nuclear fuel and high-level radioactive waste storage canister degradation. For commercial and DOE spent nuclear fuel, the analysis defined failure of the stainless-steel dry storage canister as the time at which precipitation penetrated the canister and wet the spent nuclear fuel. The analysis defined failure for the high-level radioactive waste as the time at which precipitation penetrated the canisters. This is consistent with the repository definition that failure of the waste package would occur when water penetrated the package and came in contact with the contents. The stainless-steel model used for the No-Action analysis was consistent with the waste package inner layer corrosion model used for the repository TSPA-VA (DIRS 101779-DOE 1998, Volume 3, Section 3.4) with the functional parameters modified to incorporate stainless-steel corrosion data (Section K.4.3.1 discusses the sensitivity of outcome to carbon-steel dry storage containers). In addition, the analysis used parameters appropriate for above-ground conditions, including temperature, meteorological data, and chemical constituents in the atmosphere and precipitation. Although inconsistent with the assumptions used for the TSPA-VA, the analysis took credit for the protectiveness of the high-level radioactive waste canister because (1) it is the only container between the waste material and the environment and, (2) to ignore the protectiveness of this barrier would have resulted in a considerable overestimation of impacts. This approach is consistent with the decision, in the case of the No-Action Scenario 2 analysis, to provide a realistic radionuclide release rate where possible and to preclude the overestimation of the associated radiological human health impacts.

The primary determinants of stainless-steel corrosion for the different regions are the amount, the acidity, and the chloride concentration of the precipitation. The storage canisters degrade faster in the below-grade storage configuration than on the surface due to the higher humidity in the below-grade environment. The high-level radioactive waste canisters degrade faster than the spent nuclear fuel canisters because they are not as thick. The analysis evaluated three corrosion mechanisms—general corrosion, pitting corrosion, and crevice corrosion (DIRS 104597-Battelle 1998, Appendix A). Of the three, crevice corrosion would be the dominant failure mechanism for the regions analyzed. Corrosion rates and penetration times vary among the different regions of the country. The analysis calculated regional penetration times from the time at which it assumed that precipitation first would come in contact with the stainless steel. Table K-1 lists the results.

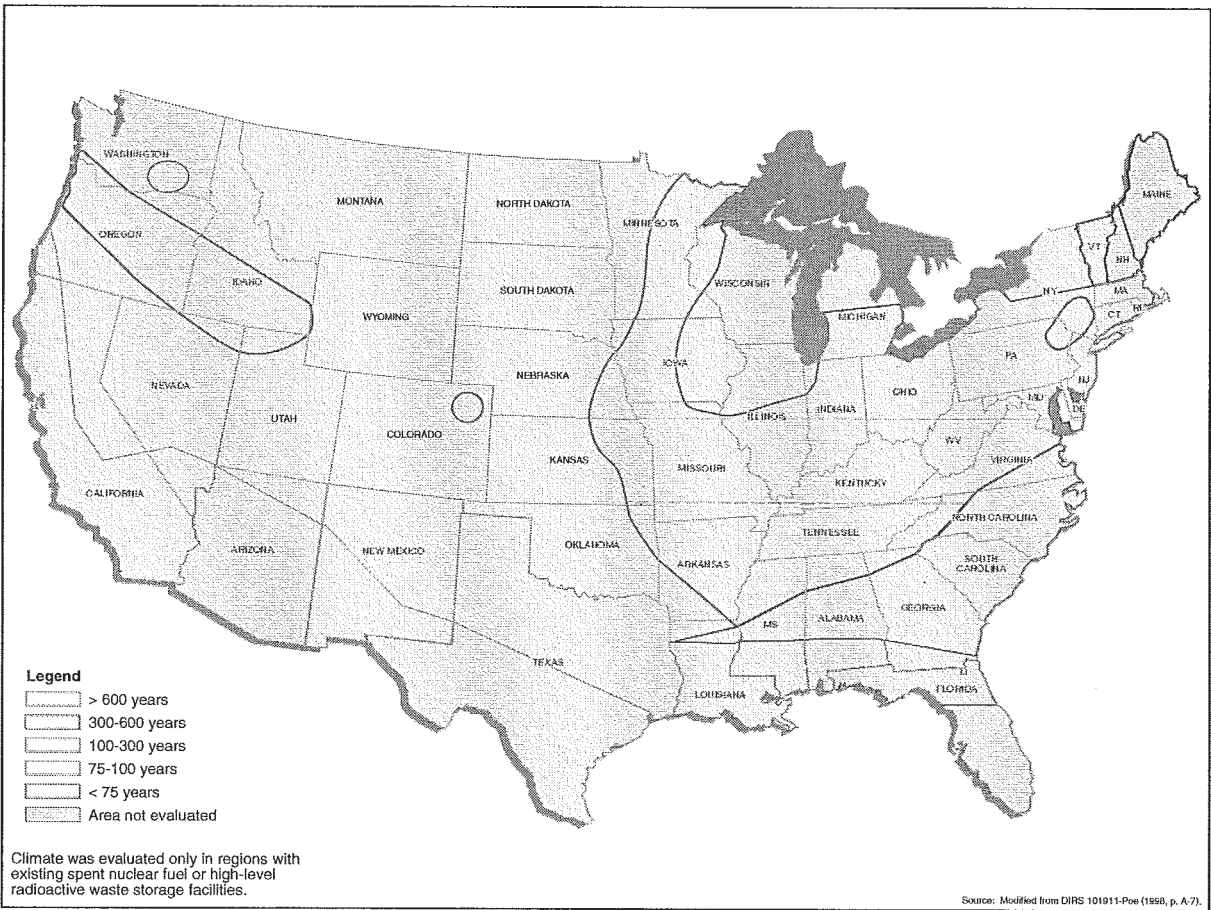


Figure K-3. Failure times for above-ground concrete storage modules.

Table K-1. Time (years) after the assumed loss of effective institutional control at which first failures would occur and radioactive materials could reach the accessible environment.

Material	Region	Storage facility	Weather ^a protection lost	Canister ^b breached (initial material release)
Commercial spent nuclear fuel	1	Surface	100	1,400
	2	Surface	700	1,500
	3	Surface	170	1,100
	4	Surface	750	1,600
	5	Surface	3,500	5,400
DOE spent nuclear fuel	2	Surface	700	1,400
	5	Surface	50	1,400
	5	Below grade	50	800
High-level radioactive waste	1	Surface	100	1,200
	2	Below grade	50	500
	5	Below grade	50	700

a. Source: Adapted from DIRS 101911-Poe (1998, Appendix A).

b. Source: DIRS 104597-Battelle (1998, data files, all); spent nuclear fuel dry storage or high-level radioactive waste canister.

K.2.1.3 Infiltration

The third process analyzes infiltration of water to the spent nuclear fuel and high-level radioactive waste. The amount of water in contact with these materials would be directly related to the size of the dry storage canister footprint and the mean (average) annual precipitation at each storage site. The rate of precipitation varies throughout the United States from extremely low (less than 25 centimeters [10 inches] per year) in the arid portions of the west to high (more than 150 centimeters [60 inches] per year) along the Gulf Coast in the southeast (Table K-2, Figure K-4). Local precipitation rates were used to determine the amount of water available that could cause dry storage canister and cladding failure, and spent nuclear fuel and high-level radioactive waste material dissolution.

Table K-2. Average regional precipitation.^a

Region	Annual precipitation (centimeters) ^b	Percent of days with precipitation
1	110	30
2	130	29
3	80	33
4	110	31
5	30	24

a. Source: Adapted from DIRS 101911-Poe (1998, Appendix A, pp. A-13 to A-16).

b. To convert centimeters to inches, multiply by 0.3937.

K.2.1.4 Cladding

The fourth process analyzed was failure of the cladding, which is a protective barrier, usually metal (aluminum, zirconium alloy, stainless steel, nickel-chromium, Hastalloy, tantalum, or graphite), surrounding the spent nuclear fuel material to contain radioactive materials. For spent nuclear fuel, cladding is the last engineered barrier to be breached before the radioactive material can begin to be released to the environment.

K.2.1.4.1 Commercial Spent Nuclear Fuel Cladding

The principal cladding material used on commercial spent nuclear fuel is zirconium alloy. About 1.2 percent (of MTHM) of commercial spent nuclear fuel is stainless-steel clad (Appendix A,



Figure K-4. Precipitation ranges for regions with existing spent nuclear fuel and high-level radioactive waste storage facilities.

Section A.2.1.5.3). To be consistent with the TSPA-VA, this analysis evaluated two cladding failure mechanisms: (1) so-called *juvenile failures* (failures existing at the start of the analysis period), and (2) *new failures* (failures that occur during the analysis period due to conditions in the storage container). The analysis assumed that juvenile failures existed in 0.1 percent of the zirconium alloy-clad spent nuclear fuel and in all of the stainless-steel-clad fuel at the beginning of the analysis period, and that after failure the cladding would offer no further protection to the radioactive material [this is consistent with the Viability Assessment assumption (DIRS 101779-DOE 1998, Volume 3, p. 3-97)].

Figure K-5 shows new failures (expressed as percent of commercial spent nuclear fuel over time) of zirconium alloy cladding, which were modeled using the median value assumed in the TSPA-VA cladding abstraction (DIRS 100362-CRWMS M&O 1998, pp. 6-19 to 6-54) for zirconium alloy corrosion. The Viability Assessment (DIRS 101779-DOE 1998, Volume 3, all) defines this information as a "fractional multiplier," which is calculated from the fraction of the failed fuel pin surface area. In the No-Action analysis, this corrosion is assumed to commence when weather protection afforded by the waste package is lost and the cladding is exposed to environmental precipitation. The TSPA-VA also considers cladding failure from creep strain, delayed hydride cracking, and mechanical failure from rock falls. These additional mechanisms normally occur after the 10,000-year analysis period and are therefore not considered in the No-Action analysis. As shown in Figure K-5, during the 10,000-year analysis period, less than 0.01 percent of the zirconium alloy-clad spent nuclear fuel would be expected to fail. If the upper limit curve from Figure 4 of the TSPA-VA cladding abstraction (DIRS 100362-CRWMS M&O 1998, pp. 6-19 to 6-54) was used, the value could be as high as 0.5 percent of the zirconium alloy-clad spent nuclear fuel. The lower limit value from the TSPA-VA cladding abstraction curve would be much less than 0.001 percent.

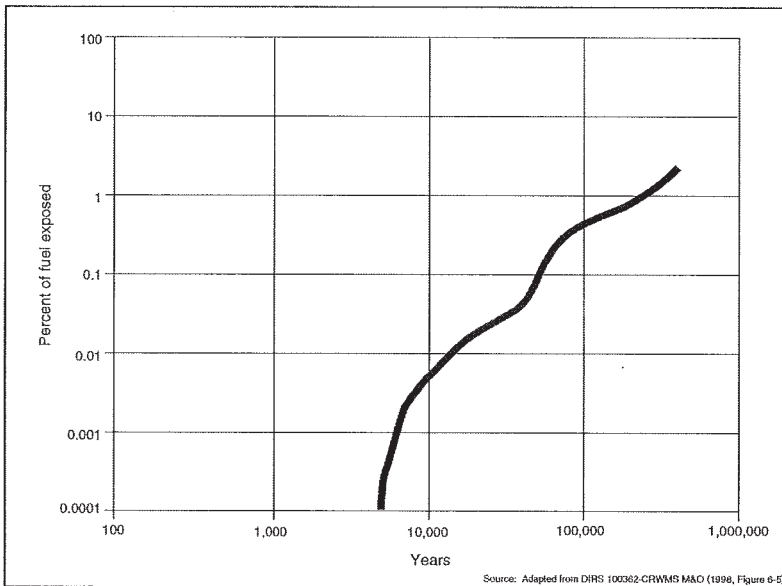


Figure K-5. Percent of commercial spent nuclear fuel exposed over time due to new failures.

K.2.1.4.2 DOE Spent Nuclear Fuel Cladding

The composition and cladding materials of DOE spent nuclear fuel vary widely. The cladding assumption for the surrogate material used in this analysis is identical (no cladding credit) to the assumption used in the TSPA-VA analysis (see Section K.4.3.1 for the discussion of uncertainty in relation to cladding).

K.2.1.5 Dissolution of Spent Nuclear Fuel and High-Level Radioactive Waste

The fifth process analyzed was the dissolution of the spent nuclear fuel and high-level radioactive waste. The rate of release of radionuclides from these materials would be related directly to the amount of surface area exposed to moisture, the quantity and chemistry of available water, and temperature. The TSPA-VA process model, modified to reflect surface environmental conditions (temperature, relative humidity, etc.), was used to estimate release rates from the exposed spent nuclear fuel and high-level radioactive waste. The model and application to surface conditions is described in detail in Battelle (DIRS 104597-Battelle 1998, pp. 2.9 to 2.11).

K.2.1.5.1 Commercial Spent Nuclear Fuel Dissolution

Consistent with the repository impact analysis, this analysis estimated that new zirconium alloy failures would begin late in the 10,000-year period (see Figure K-5). As discussed in Section K.2.1.4.1, only 0.01 percent of the zirconium alloy-clad spent nuclear fuel would be likely to fail during the 10,000-year analysis period. Therefore, most of the exposed material considered in this analysis would result from juvenile failures of zirconium alloy- and stainless-steel-clad spent nuclear fuel.

K.2.1.5.2 DOE Spent Nuclear Fuel Dissolution

The analysis assumed that DOE spent nuclear fuel would be a metallic uranium fuel with zirconium alloy cladding (a representative or surrogate fuel that consisted primarily of N-Reactor fuel). Consistent with the repository input analysis, the No-Action Scenario 2 analysis takes no credit for the cladding. The analysis used the TSPA-VA model for metallic uranium fuel, modified for surface environmental conditions, to predict releases of the DOE spent nuclear fuel.

K.2.1.5.3 High-Level Radioactive Waste Dissolution

Most high-level radioactive waste would be stored in below-grade concrete vaults. As discussed in Section K.2.1.1, these vaults would be exposed to precipitation as soon as weather protection was lost (the model assumed this would occur 50 years after loss of institutional control). After the loss of weather protection and failure of the stainless-steel canisters, the high-level radioactive waste would be exposed to precipitation. The environment in the underground vault would be humid and deterioration would occur. Thus, the material would be exposed to either standing water or humid conditions in the degrading vaults after the canister failed. The borosilicate glass deterioration model used in this analysis was the same as the TSPA-VA model modified to reflect surface conditions (temperature and precipitation chemistry).

K.2.1.6 Regionalization of Sites for Analysis

The climate of the contiguous United States varies considerably across the country. The release rate of the radionuclide inventory would depend primarily on the interactions between environmental conditions (rainfall, freeze-thaw cycles) and engineered barriers. To simplify the analysis, DOE divided the country into five regions (see Figure K-2) (DIRS 101911-Poe 1998, p. 2).

The analysis assumed that a single hypothetical site in each region would store all the spent nuclear fuel and high-level radioactive waste existing in that region. Such a site does not exist but is a mathematical construct for analytical purposes. To ensure that the calculated results for the regional analyses reflect appropriate inventory, facility and material degradation, and radionuclide transport, the spent nuclear fuel and high-level radioactive waste inventories, engineered barriers, and environmental conditions for the hypothetical sites were developed from data for each of the existing sites in the given region. Weighting criteria to account for the amount and types of spent nuclear fuel and high-level radioactive waste at each site were used in the development of the environmental data for the regional site, such that the results of the analyses for the hypothetical site were representative of the sum of the results of each actual site if they had been modeled independently (DIRS 101911-Poe 1998, p. 1). If there are no storage facilities in a particular area of the country, the environmental parameters of that area were not evaluated.

Table K-3 lists the Proposed Action and Module 1 quantities of commercial spent nuclear fuel, DOE spent nuclear fuel, and high-level radioactive waste in each of the five regions. The values in Table K-1 are the calculated results of failures of the various components of the protective engineered barriers and release of radioactive material in each region.

Table K-3. Proposed Action and Module 1 quantities of spent nuclear fuel (metric tons of heavy metal) and canisters of high-level radioactive waste in each geographic region.^{a,b}

Region	Commercial spent nuclear fuel ^c									
	Region total ^d		With juvenile cladding failure		Stainless-steel cladding	DOE spent nuclear fuel ^e		High-level radioactive waste ^f		
	Proposed Action (MTHM)	Module 1 (MTHM)	Proposed Action (MTHM)	Module 1 (MTHM)	Proposed Action and Module 1 (MTHM)	Proposed Action (MTHM)	Module 1 (MTHM)	Proposed Action ^g (canisters)	Module 1 ^g (canisters)	
1	16,800	27,000	16	27	410			300	300	
2	18,900	31,800	19	32	0	30	45	6,000	6,200	
3	15,000	22,900	15	23	170					
4	7,200	14,100	7	14	0					
5	5,400	9,600	5	9	140	2,300	2,455	2,000	15,500	
Totals	63,000	105,000	62	105	720	2,300	2,500	8,300	22,000	

- a. Source: Appendix A.
- b. Totals might differ from sums due to rounding.
- c. All analyzed as stored on surface as shown on Chapter 2, Figures 2-32, 2-33, and 2-34.
- d. Includes plutonium in mixed-oxide spent nuclear fuel, which is assumed to behave like other commercial spent nuclear fuel.
- e. A representative or surrogate fuel that consisted primarily of N-reactor fuel.
- f. Includes immobilized plutonium.
- g. Historically, a canister of high-level radioactive waste has been assumed to be equivalent to about 0.5 MTHM (see Appendix A, Section A.2.3.1).

K.2.2 RADIONUCLIDE RELEASE

The sixth and final step in the process is the release of radioactive materials to the environment. The anticipated release rates (fluxes) were estimated in terms of grams per 70-year period (typical human life expectancy in the United States) of uranium dioxide, uranium metal, or borosilicate glass for commercial spent nuclear fuel, DOE spent nuclear fuel, and high-level radioactive waste, respectively. To assess potential lifetime impacts on human receptors, the amount of fission products and transuranics associated with gram quantities of uranium dioxide, uranium metal, and borosilicate glass were calculated for approximately 140 consecutive 70-year average human lifetimes to determine releases from the 10,000-year analysis period. Weighting criteria were used to ensure appropriate contributions by the different types of spent nuclear fuel and the high-level radioactive waste in each region, as appropriate.

The result was a single release rate for each region that accounted for the different materials (uranium dioxide, uranium metal, and borosilicate glass).

The radionuclide distributions in the spent nuclear fuel and high-level radioactive waste (Appendix A) were used for these analyses. These were expressed as radionuclide-specific curies for storage packages (assembly or canister). The curies per storage package were converted to curies per gram of uranium dioxide, uranium metal, or borosilicate glass (as described above for each spent nuclear fuel and high-level radioactive waste material). This radionuclide distribution was multiplied by release flux (curies of spent nuclear fuel and high-level radioactive waste material per 70-year period) after being corrected for decay and the ingrowth of decay products for various times after disposal. These corrections were determined using the ORIGEN computer program (DIRS 147923-RSIC 1991, all) for each of the approximately 140 consecutive 70-year human lifetimes to determine the release over the 10,000-year period. The results of the ORIGEN runs were used as input to the environmental transport program.

DEFINITIONS

Fission products: Radioactive or non-radioactive atoms that are produced by the fission (splitting) of heavy atoms, such as uranium.

Transuranics: Radioactive elements, heavier than uranium, that are produced in a nuclear reactor when uranium atoms absorb neutrons rather than splitting. Examples of transuranics include plutonium, americium, and neptunium.

Curie: The basic unit of radioactivity. It is equal to the quantity of any radionuclide in which 37 billion atoms are decaying per second.

Specific activity: An expression of the number of curies of activity per gram of a given radionuclide. It is dependent on the half life and molecular weight of the nuclide.

In addition to the isotopes identified in the repository inventory specified in Appendix A, the No-Action Scenario 2 analysis considered 167 other isotopes in the light-water reactor radiological database (DIRS 102588-DOE 1992, p. 1.1-1). Of the 220 isotopes evaluated, six would contribute more than 99.5 percent of the total dose. Table K-4 lists these six isotopes along with technetium-99, which individually would contribute less than 0.003 percent of the total dose. Plutonium-239 and -240 would contribute more than 96 percent of the radiological impacts during the 10,000-year analysis period because of their very large dose conversion factors. Americium-241 and -243 would be minor contributors to the dose. Neptunium-237 and technetium-99 were of tertiary importance (Table K-4).

Table K-4. Radionuclides and relative contributions over 10,000 years to Scenario 2 impacts.^a

Isotope	Percent of total dose
Americium-241	3.2
Americium-243	0.86
Neptunium-237	0.29
Plutonium-238	0.2
Plutonium-239	49.0
Plutonium-240	47.0
Technetium-99	< 0.003

a. Source: DIRS 101935-Toblin (1999, p. 6).

K.2.3 ENVIRONMENTAL TRANSPORT OF RADIOACTIVE MATERIALS

Radioactive materials in degraded spent nuclear fuel and high-level radioactive waste could be transported to the environment surrounding each storage facility by three pathways: groundwater, surface-water runoff, and atmosphere. Figure K-6 shows the potential exposure pathways. The analysis assumed that existing local climates would persist throughout the time of exposure of the spent nuclear fuel and high-level radioactive waste to the environment. The assumed configuration for the

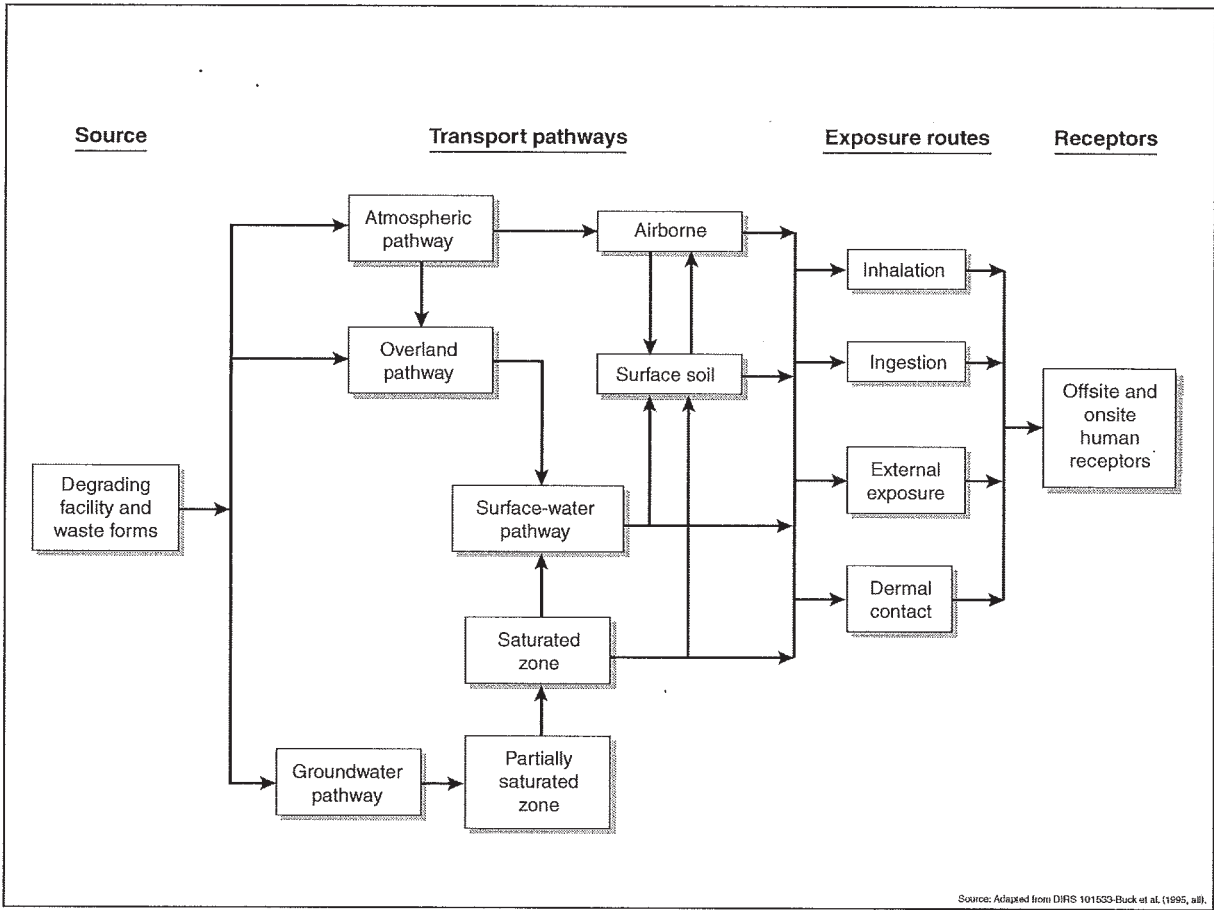


Figure K-6. Potential exposure pathways associated with degradation of spent nuclear fuel and high-level radioactive waste.

degraded storage facilities would have debris covering the radioactive material, which would remain inside the dry storage canisters. While the dry storage canisters could fail sufficiently to permit water to enter, they probably would retain their structural characteristics, thereby minimizing the dispersion of radioactive particulate material to the atmosphere (DIRS 147905-Mishima 1998, p. 4). Based on this analysis, the airborne particulate pathway generally would not be an important source of human exposure. The assumption is that after radionuclides dissolved in the precipitation they would reach the environment either through groundwater or surface-water transport.

The analysis performed environmental fate and transport pathway modeling using the Multimedia Environmental Pollutant Assessment System program (DIRS 101533-Buck et al. 1995, all). The Multimedia Environmental Pollutant Assessment System is an integrated system of analytical, semianalytical, and empirically based mathematical models that simulate the transport and fate of radioactive materials through various environmental media and calculate concentrations, doses, and health effects at designated receptor locations.

The Multimedia Environmental Pollutant Assessment System was originally developed by Pacific Northwest National Laboratory to enable DOE to prioritize the investigation and remediation of the Department's hazardous, radioactive, and mixed waste sites in a scientific and objective manner based on readily available site information. The Multimedia Environmental Pollutant Assessment System has evolved into a widely accepted (by Federal and international agencies) computational tool for calculating the magnitude of environmental concentrations and public health impacts caused by releases of radioactive material from various sources.

The following sections discuss the assumptions and methods used to determine radioactive material transport for groundwater and surface-water pathways. Environmental parameters defined for input to the Multimedia Environmental Pollutant Assessment System program were collected from various sources for specific sites (DIRS 101925-Sinkowski 1998, p. 2) and regionalized parameters were developed (DIRS 101912-Poe and Wise 1998, all). The analysis used long-term averages to represent environmental conditions, and assumed that these parameters would remain constant over the 10,000-year analysis period. The following sections discuss the method for each pathway.

K.2.3.1 Groundwater Transport

Precipitation falling on degrading spent nuclear fuel and high-level radioactive waste material would form a radioactive solution (leachate) that could migrate through the vadose zone (the unsaturated upper layer of soil) to the underlying water table, which would dilute, disperse, and transport the material downgradient through the local aquifer system. As a result, there is a potential for human exposure through the groundwater pathway to downgradient well users and to populations along surface-water bodies where groundwater feeds into surface water.

The groundwater component of the radioactive material fluxes (infiltration) averaged over 70-year (lifetime) increments was entered in the Multimedia Environmental Pollutant Assessment System program. The infiltration would carry the contaminated leachate down through the vadose zone to the saturated zone (aquifer). The contaminants would be diluted and dispersed as they traveled through the aquifer. Radioactive material retardation would occur in both the unsaturated (above the water table) and saturated (below the water table) zones. A distribution adsorption (that is, surface retention) coefficient, K_d , (the amount of material adsorbed to soil particles relative to that in the water) modeled this retardation (DIRS 101935-Toblin 1999, p. 2). This coefficient is radioactive material-specific and varies for each material based on such factors as soil pH and clay content.

Table K-5 lists the adsorption coefficients, K_d , for the elements explicitly modeled for groundwater transport. The coefficients are expressed as a function of the clay content of the soil through which the

Table K-5. Multimedia Environmental Pollutant Assessment System default elemental equilibrium adsorption coefficients (K_d ; milliliters per gram) for soil pH between 5 and 9.^a

Element	Clay content by weight		
	< 10 percent	10 to 30 percent	≥ 30 percent
Actinium	228	538	4,600
Americium	82	200	1,000
Californium	0	0	0
Carbon	0	0	0
Cesium	51	249	270
Chlorine	0	0	0
Cobalt	2	9	200
Curium	82	200	1,000
Iodine	0	0	0
Krypton	0	0	0
Lead	234	597	1,830
Neptunium	3	3	3
Nickel	12	59	650
Niobium	50	100	100
Palladium	0	4	40
Plutonium	10	100	250
Protactinium	0	50	500
Radium	24	100	124
Ruthenium	274	351	690
Samarium	228	538	4,600
Selenium	6	15	15
Strontium	24	100	124
Technetium	3	20	20
Thorium	100	500	2,700
Tin	5	10	10
Tritium	0	0	0
Uranium	0	50	500
Zirconium	50	500	1,000

a. Source: DIRS 101935-Toblin (1999, p. 2).

elements are being transported; the analyses assumed a soil pH between 5 and 9. Note that the K_d values of all isotopes of a given element (for example, plutonium-238, -239, and -240) are the same, because adsorption is a chemical rather than nuclear process.

The time required to traverse the groundwater was determined for each radionuclide. Tables K-6 and K-7 list the range of nuclide groundwater transport times, from source to receptor, for each of the five regions. Times are listed for the important nuclides (see Table K-4). The analysis assumed that the vadose/aquifer flow fields were steady-state, so that the nuclide travel times at a particular site would be constant over the 10,000-year analysis period, although the nuclide release rates were not. Table K-6 lists parameters describing the total (over the analysis period) and maximum nuclide release rates for the same important nuclides. Region 5, dominated by two large DOE sites, is seen to result in the largest nuclide releases of all of the regions.

Table K-7 also lists the number of water systems and people that would obtain water from the affected waterways. Many of these people would be subject to impacts from more than one site because they would obtain their water from affected waterways downstream from multiple sites.

When the groundwater reached the point where it outcropped to surface water, radioactive material transport would be subject to further dilution and dispersion. For most of the regions analyzed, the

Table K-6. Regional source terms and environmental transport data for important isotopes used for collective drinking water radiological impact analysis.^a

Parameter	Plutonium-239/240	Plutonium-238	Americium-241	Americium-243	Neptunium-237	Technetium-99
<i>Nuclide released in 10,000 years (curies)</i>						
Region 1	4,200	20	660	115	8.9	98
Region 2	17,000	97	1,500	240	32	1,200
Region 3	130,000	660	31,000	3,300	260	2,600
Region 4	4,300	17	450	110	9.0	89
Region 5	570,000	180	42,000	1,700	720	6,500
<i>Maximum annual nuclide release (curies per year)</i>						
Region 1	19	0.020	1.2	0.053	0.0031	0.034
Region 2	53	0.035	2.2	0.11	0.0083	0.19
Region 3	60	0.71	56	1.6	0.092	1.0
Region 4	0.20	0.016	0.78	0.054	0.0034	0.035
Region 5	140	0.22	66	0.47	0.14	1.4
<i>Years (from 2016) of maximum annual nuclide release</i>						
Region 1	1,435	1,435	1,435	1,435	1,435	1,435
Region 2	1,575	1,575	1,575	1,575	1,575	1,575
Region 3	1,155	1,155	1,155	1,155	1,155	1,155
Region 4	1,715	1,715	1,715	1,715	1,715	1,715
Region 5	875	875	875	875	875	875
<i>Nuclide reaching receptors in 10,000 year (curies)</i>						
Region 1	3,600	11	130	43	8.8	95
Region 2	13,000	10	1.4	39	31	1,100
Region 3	110,000	250	380	510	250	2,500
Region 4	2,000	3.6	0.66	24	6.0	59
Region 5	180,000	2.6	0.020	1.2	630	5,600
<i>Nuclide transport time^b (years)</i>						
Region 1	10-5,500	10-5,500	10-45,000	10-45,000	10-1,700	10-1,700
Region 2	460-9,000	460-9,000	2,000-36,000	2,000-36,000	43-860	140-1,500
Region 3	65-45,000	65-45,000	410-260,000	410-260,000	31-9,800	31-9,800
Region 4	850-520,000	850-520,000	3,000-1,000,000	3,000-1,000,000	59-16,000	130-100,000
Region 5	1,400-26,000	1,400-26,000	2,700-220,000	2,700-220,000	44-8,000	280-8,000

a. Source: DIRS 101935-Toblin (1999, p. 4).

b. Time from source to receptor.

Table K-7. Transport and population data for drinking water pathway impact analysis.

Parameter	Region 1	Region 2	Region 3	Region 4	Region 5
Groundwater flow time (years) ^a	2.0 - 59	4.6 - 37	1.8 - 420	4.6 - 960	2.9 - 190
Number of people that would obtain domestic water supply from affected waterways (millions) ^b	6.7	5.3	13.1	5.3	0.16
Affected drinking water systems ^c	112	147	137	64	23

a. From source to outcrop; Source: Adapted from DIRS 101852-Jenkins (1998, Table 2).

b. Source: DIRS 101911-Poe (1998, p. 12).

c. Source: Adapted from DIRS 101925-Sinkowski (1998, all).

distance between the storage location and the downgradient surface-water body would be inside the site boundary; therefore, offsite wells generally would not be affected. However, the analysis calculated groundwater concentrations for hypothetical onsite and offsite receptors. The Multimedia Environmental Pollutant Assessment System program calculated groundwater and surface-water concentrations at each receptor location for consecutive 70-year lifetimes in the 10,000-year analysis period.

The parameters necessary for the spent nuclear fuel and high-level radioactive waste storage sites for the Multimedia Environmental Pollutant Assessment System were defined. Pertinent hydrologic and hydrogeologic information was derived from the site-specific Updated Final Safety Analysis Reports for commercial nuclear sites and site-specific data provided by the various DOE sites (DIRS 101852-Jenkins 1998, p. 1).

Table K-8 lists the range (over the individual sites) in each region of the important hydrogeologic parameters that would affect the transport of the radionuclides through the groundwater. These parameters form the basis for the nuclide transport times listed in Table K-7.

Table K-8. Multimedia Environmental Pollutant Assessment System regional groundwater input parameters.^a

Parameter	Region 1	Region 2	Region 3	Region 4	Region 5
<i>Vadose zone</i>					
Contaminated liquid infiltration rate (vertical Darcy velocity) (feet per year) ^b	3.1 - 3.5	4.4	2.7 - 3.1	2.7 - 4.4	0.88 - 3.1
Clay content (percent)	0 - 15	1 - 47	1 - 47	3 - 15	0 - 15
pH of pore water	5 - 9	5 - 9	5 - 9	5 - 9	5 - 9
Thickness (feet)	6 - 40	5 - 70	4 - 31	5 - 50	23 - 250
Bulk density (grams per cubic centimeter)	1.4 - 1.9	1.4 - 1.6	1.4 - 1.6	1.4 - 1.6	1.4 - 1.7
Total porosity (percent)	5 - 46	38 - 49	38 - 49	38 - 46	38 - 49
Field capacity (percent)	2.5 - 28	9 - 42	9 - 42	9 - 28	3 - 28
Saturated hydraulic conductivity (feet per year)	210 - 6,800	27 - 6,800	27 - 6,800	210 - 6,800	72 - 6,800
<i>Aquifer</i>					
Clay content (percent)	0 - 10	0 - 47	0 - 15	0 - 15	0 - 10
pH of pore water	5 - 9	5 - 9	5 - 9	5 - 9	5 - 9
Thickness (feet)	6 - 120	10 - 85	7 - 160	20 - 150	25 - 250
Bulk density (grams per cubic centimeter)	1.6 - 2.1	1.4 - 2.0	1.5 - 1.7	1.4 - 1.7	1.5 - 1.9
Total porosity (percent)	5 - 44	5 - 49	5 - 46	5 - 46	23 - 44
Effective porosity (percent)	2.9 - 22	2.9 - 28	2.9 - 25	2.9 - 27	13 - 25
Saturated hydraulic conductivity (feet per year)	210 - 6,800	27 - 6,800	27 - 6,800	210 - 6,800	72 - 6,800
Darcy velocity (feet per year)	6.8 - 1,400	12 - 170	3.9 - 430	0.58 - 270	33 - 560
Travel distance (feet)	1,900 - 5,600	2,000 - 4,700	1,900 - 23,000	1,600 - 12,000	1,900 - 37,000

a. Source: Adapted from DIRS 101852-Jenkins (1998, Table 2).

b. Annual precipitation rate (through degraded structure).

A simplifying analytical assumption was that radioactive material transport would occur only through the shallowest aquifer beneath the site. Because this assumption limits the interchange of groundwater with underlying aquifers, less radioactive material dilution would occur, and groundwater pathway impacts could be slightly overestimated. However, because impacts from the groundwater pathway would be minor in comparison to surface-water pathways, the total estimated impacts would not be affected by this assumption.

K.2.3.2 Surface-Water Transport

The amount of leachate from degraded spent nuclear fuel and high-level radioactive waste in the surface-water pathway would depend on soil characteristics and the local climate. The Multimedia Environmental Pollutant Assessment System considers precipitation rates (Table K-2), soil infiltration, evapotranspiration, and erosion management practices to determine the amount of leachate that would run off rather than percolate into the soil. The contaminated runoff would travel overland and eventually enter nearby rivers and streams that would dilute it further.

To determine the impacts of the contaminated discharge to surface water on the downstream populations using that water (affected populations), DOE calculated the surface water flow rate and the release rate of contaminants (as curies per year) contributed by each storage location draining to the surface water. Using these values, DOE determined surface-water radionuclide concentrations for each receptor location. DOE applied these concentrations to the respective affected populations to estimate impacts for each region.

K.2.3.3 Atmospheric Transport

If degraded spent nuclear fuel or high-level radioactive waste was exposed to the environment, small particles could become suspended in the air and transported by wind. The Multimedia Environmental Pollutant Assessment System methodology includes formulations for radioactive material (particulate) suspension by wind, vehicular traffic, and other physical disturbances of the ground surface. The impacts from the atmospheric pathways would be small in comparison to surface-water pathways because the cover provided by the degraded structures and the relatively large particle size and density of the materials (see Section K.2.3) would preclude suspension by wind. Therefore, impacts from the transport of radioactive particulate materials were not included in the analysis.

K.2.4 HUMAN EXPOSURE AND DOSE CALCULATIONS

This section describes methods used in the No-Action Scenario 2 analysis to estimate dose rates and potential impacts to individuals and population groups from exposures to radionuclide contaminants in groundwater and surface water and in the atmosphere. As discussed above, these contaminated environmental media would result from the degradation of storage facilities (Sections K.2.1.1), corroding dry storage canisters (Section K.2.1.2), cladding failure (Section K.2.1.4), spent nuclear fuel and high-level radioactive waste dissolution (Section K.2.1.5), leachate percolation and groundwater transport (Section K.2.3.1), surface-water runoff (Section K.2.3.2), and atmospheric suspension and transport (Section K.2.3.3).

For Scenario 1 and the first 100 years of Scenario 2, the presence of effective institutional control would ensure that radiological releases to the environment and radiation doses to workers and the public remained within Federal limits and DOE Order requirements and were maintained as low as reasonably achievable. As a result, impacts to members of the public would be very small. Potential radiological human health impacts that could occur would be due primarily to occupational radiation exposure of onsite workers. The analysts estimated these impacts based on actual operational data from commercial nuclear powerplant sites (DIRS 101898-NRC 1991, pp. 22 to 25) and projected these impacts for the 100- and 10,000-year analysis periods for Scenario 1.

For Scenario 2, impacts to onsite workers and the public during institutional control (approximately 100 years) would be the same as those for Scenario 1. However, because the assumption for Scenario 2 is that there would be no effective institutional control after approximately 100 years, engineered barriers would begin to degrade and eventually would not prevent radioactive materials from the spent nuclear fuel and high-level radioactive waste from entering the environment. During the period of no effective institutional control, there would be no workers at the site. Thus, impacts were calculated only for the public.

For Scenario 2, the potential highest exposures and dose rates over a 70-year lifetime period were evaluated for individuals and exposed populations. In addition, the total integrated dose to the exposed population for the 10,000-year analysis period was estimated. Human exposure parameters (exposure times, ingestion and inhalation rates, agricultural activities, food consumption rates, etc.) were developed based on recommendations from Federal agencies (DIRS 101819-EPA 1988, pp. 113 to 131; DIRS 101820-EPA 1991, Attachment B; DIRS 100067-NRC 1977, pp. 1.109-1 to 1.109-2; DIRS 147925-

Shippers and Harlan 1989, all; DIRS 147915-NRC 1991, Chapter 6) and are reflected as Multimedia Environmental Pollutant Assessment System default values (DIRS 101533-Buck et al. 1995, Section 1.0). Other parameters chosen for this analysis are summarized in supporting documentation (DIRS 101925-Sinkowski 1998, all; DIRS 101935-Toblin 1999, all; DIRS 101936-Toblin 1999, all; DIRS 101937-Toblin 1998, all). Table K-9 lists the exposure and usage parameters for all of the pathways considered in the analysis (see Section K.3.1).

The Scenario 2 analysis evaluated long-term radiation doses and impacts to populations exposed through the surface-water and groundwater pathways. This analysis estimated population impacts only for the drinking water pathway using regionalized effective populations and surface-water dilution factors discussed in Section K.2.3.2. Other pathways were evaluated to determine their potential contribution in relation to drinking water doses. These analyses are discussed in Section K.3.1.

K.2.4.1 Gardener Impacts

To reasonably bound human health impacts resulting from human intrusion, two types of gardener were evaluated—the onsite gardener (10 meters [33 feet] from the degrading storage facility) and the near-site gardener (5 kilometers [3 miles] from the degrading facility). The analysis had both of these hypothetical gardeners residing on the flow path for groundwater. The gardeners would obtain all their drinking water from contaminated groundwater, grow their subsistence gardens in contaminated soils, and irrigate them with the contaminated groundwater. The contaminated garden soils, suspended by the wind, would contaminate the surfaces of the vegetables consumed by the gardeners. The hypothetical onsite gardener would be the maximally exposed individual.

HUMAN INTRUSION

Spent nuclear fuel and high-level radioactive waste in surface or below-grade storage facilities would be readily accessible in the absence of institutional control. For this reason, DOE anticipates that both planned and inadvertent intrusions could occur. An example of the former would be the scavenger who searches through the area seeking articles of value; an example of the latter would be the farmer who settles on the site and grows agricultural crops with no knowledge of the storage structure beneath the soil. Intrusions into contaminated areas also could occur through activities such as building excavations, road construction, and pipeline or utility replacement.

Under the conditions of Scenario 2, intruders could receive external exposures from stored spent nuclear fuel and high-level radioactive waste that would grossly exceed current regulatory limits and, in some cases, could be sufficiently high to cause prompt fatalities. In addition, long-term and repeated intrusions, such as those caused by residential construction or agricultural activities near storage sites, could result in long-term chronic exposures that could produce increased numbers of latent cancer fatalities. These intrusions could also result in the spread of contamination to remote locations, which could increase the total number of individuals potentially exposed.

Calculations were performed using transport models described by DIRS 101533-Buck et al. (1995, all) for gardeners in each of the five analysis regions using regionalized source terms and environmental parameters. Therefore, calculated impacts to the regional gardener (maximally exposed individual) would not represent the highest impacts possible from a single site in a given region, but rather would reflect an average impact for the region. Details of the analysis are provided in DIRS 101937-Toblin (1998, all). The regional hydrogeologic parameters listed in Table K-10, together with transient nuclide release rates (the maximum of which is indicated in the table), were used to determine the radiological impacts to the regional gardener as a result of groundwater transport. The regional parameters were based on a curie-weighting of the individual site parameters for plutonium and americium. The exposure

Table K-9. Multimedia Environmental Pollutant Assessment System human exposure input parameters for determination of all pathways radiological impacts sensitivity analysis (page 1 of 2).^a

Water source ^b	Surface water
Domestic water supply treatment ^c	Yes
Fraction of plutonium removed by water treatment ^d	0.3
Drinking water rate (liters per day per person) ^e	2
Irrigation rate (liters per square meter per month) ^f	100
Leafy vegetable consumption rate (kilograms per day per person) ^g	0.021
Other vegetable consumption rate (kilograms per day per person)	0.13
Meat consumption rate (kilograms per day per person)	0.065
Milk consumption rate (kilograms per day per person)	0.075
Finfish consumption rate (kilograms per day per person)	0.0065
Shellfish consumption rate (kilograms per day per person)	0.0027
Shoreline contact (hours per day per person)	0.033
Americium ingestion dose conversion factor (rem per picocurie) ^h	3.6×10 ⁻⁶
Americium finfish bioaccumulation factor	250
Americium shellfish bioaccumulation factor	1,000
Americium meat transfer factor (days per kilogram)	3.5×10 ⁻⁶
Americium milk transfer factor (days per liter)	4.0×10 ⁻⁷
Neptunium ingestion dose conversion factor (rem per picocurie)	4.4×10 ⁻⁶
Neptunium finfish bioaccumulation factor	250
Neptunium shellfish bioaccumulation factor	400
Neptunium meat transfer factor (days per kilogram)	5.5×10 ⁻⁵
Neptunium milk transfer factor (days per liter)	5.0×10 ⁻⁶
Technetium ingestion dose conversion factor (rem per picocurie)	1.5×10 ⁻⁹
Technetium finfish bioaccumulation factor	15
Technetium shellfish bioaccumulation factor	5
Technetium meat transfer factor (days per kilogram)	8.5×10 ⁻³
Technetium milk transfer factor (days per liter)	1.2×10 ⁻²
Plutonium ingestion dose conversion factor (rem per picocurie) ⁱ	3.5×10 ⁻⁶
Plutonium finfish bioaccumulation factor	250
Plutonium shellfish bioaccumulation factor	100
Plutonium meat transfer factor (days per kilogram)	5.0×10 ⁻⁷
Plutonium milk transfer factor (days per liter)	1×10 ⁻⁷
Yield of leafy vegetables [kilograms (wet) per square meter]	2.0
Yield of vegetables [kilograms (wet) per square meter]	2.0
Yield of meat feed crops [kilograms (wet) per square meter]	0.7
Yield of milk animal feed crops [kilograms (wet) per square meter]	0.7
Meat animal intake rate for feed (liters per day)	68
Milk animal intake rate for feed (liters per day)	55
Meat animal intake rate for water (liters per day)	50
Milk animal intake rate for water (liters per day)	60
Agricultural areal soil density (kilograms per square meter)	240
Retention fraction of activity on plants	0.25
Translocation factor for leafy vegetables	1.0
Translocation factor for other vegetables	0.1
Translocation factor for meat animal	0.1
Translocation factor for milk animal	1.0
Fraction of meat feed contaminated	1.0
Fraction of milk feed contaminated	1.0
Fraction of meat water contaminated	1.0
Fraction of milk water contaminated	1.0
Meat animal soil intake rate (kilograms per day)	0.5

Table K-9. Multimedia Environmental Pollutant Assessment System human exposure input parameters for determination of all pathways radiological impacts sensitivity analysis (page 2 of 2).^a

	Water source ^b	Surface water
Milk animal soil intake rate (kilograms per day)		0.5
Leafy vegetable growing period (days)		60
Other vegetable growing period (days)		60
Beef animal feed growing period (days)		30
Milk animal feed growing period (days)		30
Water intake rate while showering (liters per hour)		0.06
Duration of shower exposure (hours per shower)		0.167
Shower frequency (per day)		1.0
Thickness of shoreline sediment (meters)		0.04
Density of shoreline sediments (grams per cubic meter)		1.5
Shore width factor for shoreline external exposure		0.2

- a. Source: DIRS 101936-Toblin (1999, pp. 4 and 5).
- b. Groundwater for gardener.
- c. No for gardener.
- d. Zero for gardener.
- e. To convert liters to gallons, multiply by 0.26418.
- f. To convert liters per square meter to gallons per square foot, multiply by 0.00025.
- g. To convert kilograms to pounds, multiply by 2.2046.
- h. Sediment ingestion = 0.1 grams per hour (0.000022 pound per hour) during contact.
- i. For plutonium-239/240.

Table K-10. Multimedia Environmental Pollutant Assessment System groundwater transport input parameters for estimating radiological impacts to the onsite and near-site gardener.^a

Parameter	Region 1	Region 2	Region 3	Region 4	Region 5
<i>Vadose zone</i>					
Contaminated liquid infiltration rate (vertical Darcy velocity) (feet per year) ^{b,c}	3.5	4.4	2.7	3.5	0.88
Clay content (percent)	1	10	12	11	2
pH of pore water	5 - 9	5 - 9	5 - 9	5 - 9	5 - 9
Thickness (feet)	11	44	7.1	43	180
Longitudinal dispersivity (feet)	0.11	0.44	0.071	0.43	1.8
Bulk density (grams per cubic meter) ^d	1.6	1.5	1.5	1.5	1.6
Total porosity (percent)	38	42	44	45	41
Field capacity (percent)	9.3	15	23	21	12
Saturated hydraulic conductivity (feet per year)	6,500	660	1,700	1,000	5,900
<i>Aquifer</i>					
Clay content (percent)	1.8	6.5	1.2	4.4	0.69
pH of pore water	5 - 9	5 - 9	5 - 9	5 - 9	5 - 9
Thickness (feet)	45	50	37	64	210
Bulk density (grams per cubic meter)	1.6	1.8	1.6	1.6	1.7
Total porosity (percent)	38	40	38	35	30
Effective porosity (percent)	22	23	22	20	17
Darcy velocity (feet per year)	340	62	69	51	300
Longitudinal dispersivity (feet)	f(x) ^e	f(x)	f(x)	f(x)	f(x)
Lateral dispersivity (feet)	f(x) ÷ 3	f(x) ÷ 3	f(x) ÷ 3	f(x) ÷ 3	f(x) ÷ 3
Vertical dispersivity (feet)	f(x) ÷ 400	f(x) ÷ 400	f(x) ÷ 400	f(x) ÷ 400	f(x) ÷ 400
Maximum annual plutonium-239 and -240 release (curies per year)	4.9	0.24	3.8	0.32	2.1
Years (from 2016) of maximum annual plutonium release	1,365	1,575	1,155	1,715	875

- a. Source: DIRS 101937-Toblin (1998, p. 2-4).
- b. Annual precipitation rate (through degraded structure).
- c. To convert feet to meters, multiply by 0.3048.
- d. To convert grams per cubic meter to pounds per cubic foot, multiply by 0.0000624.
- e. $f(x) = 2.72 \times (\log_{10} 0.3048 \times x)^{2.44}$, where x = downgradient distance.

parameters in Table K-9 describe the radionuclide exposure to the gardener where applicable (for example, exposure parameters related to the fish are not applicable to the gardener).

K.2.4.2 Direct Exposure

The analysis evaluated potential external radiation dose rates to the maximally exposed individual for a commercial independent spent fuel storage installation because this type of facility would provide the highest external exposures of all the facilities analyzed in this appendix. Maximum dose rates over the 10,000-year analysis period were evaluated for each region. The maximally exposed individual was assumed to be 10 meters (about 33 feet) from an array of concrete storage modules containing 1,000 MTHM of commercial spent nuclear fuel. The maximum dose rate varied between regions depending on how long the concrete shielding would remain intact (Table K-1).

The direct gamma radiation levels were calculated (DIRS 101556-Davis 1998, all). To ensure consistency between this analysis and the TSPA-VA, the same radionuclides were used for the design of the Yucca Mountain Repository surface facility shielding (DIRS 104603-CRWMS M&O 1995, Attachment 9.5). Radionuclide decay and radioactive decay product ingrowth over the 10,000-year analysis period were calculated using the ORIGEN computer program (DIRS 147923-RSIC 1991, all).

Neutron emissions were not included because worst-case impacts (death within a short period of exposure) would be the same with or without the neutron component.

K.2.5 ACCIDENT METHODOLOGY

Spent nuclear fuel and high-level radioactive waste stored in above-ground dry storage facilities would be protected initially by the robust surrounding structure (either metal or concrete) and by a steel storage container that contained the material. Normal storage facility operations would be primarily passive because the facilities would be designed for cooling via natural convection. DOE evaluated potential accident and criticality impacts for both Scenario 1 (institutional control for 10,000 years) and Scenario 2 (assumption of no effective institutional control after approximately 100 years with deterioration of the engineered barriers initially protecting the spent nuclear fuel or high-level radioactive waste).

For Scenario 1, human activities at each facility would include surveillance, inspection, maintenance, and equipment replacement when required. The facilities and the associated systems, which would be licensed by the Nuclear Regulatory Commission, would have certain required features. License requirements would include isolation of the stored material from the environment and its protection from severe accident conditions (10 CFR 50.34). The Nuclear Regulatory Commission requires an extensive safety analysis that considers the impacts of plausible accident-initiating events such as earthquakes, fires, high winds, and tornadoes. No plausible accident scenarios have been identified that result in the release of radioactive material from the storage facilities (DIRS 103449-PGE 1996, all; DIRS 103177-CP&L 1989, all). In addition, the license would specify that facility design requirements include features to provide protection from the impacts of severe natural events. These requirements and analyses must demonstrate that the facilities can withstand the most severe wind loading (tornado winds and tornado-generated missiles) and flooding from the Probable Maximum Hurricane with minimal release of radioactive material. This analysis assumed maintenance of these features indefinitely for the storage facilities.

DOE performed a scoping analysis to identify the kinds of events that could lead to releases of radioactive material to the environment prior to degradation of concrete storage modules and found none. The two events determined to be the most challenging to the integrity of the concrete storage modules would be the crash of an aircraft into the storage facility and a severe seismic event.

- DIRS 103711-Davis, Strenge, and Mishima (1998, all) evaluated the postulated aircraft crash and subsequent fire at a storage facility. The analysis showed that falling aircraft components produced by such an event would not penetrate the storage facility and that a subsequent fire would not result in a release of radioactive materials.
- For the seismic event, meaningful damage would be unlikely because storage facilities would be designed to withstand severe earthquakes. Even if such an event caused damage, no immediate release would occur because no mechanism has been identified that would cause meaningful fuel pellet damage to create respirable airborne particles. If this damage did not occur, the source term would be limited to gaseous fission products, carbon-14, and a very small amount of preexisting fuel pellet dust. Subsequent repairs to damaged facilities or concrete storage modules would preclude the long-term release of radionuclides.

Criticality events are not plausible for Scenario 1 because water, which is required for criticality, could not enter the dry storage canister. The water would have to penetrate several independent barriers, all of which would be maintained and replaced as necessary under Scenario 1.

Under Scenario 2, facilities would degrade over time and the structures would gradually deteriorate and lose their integrity. The analysis determined that two events, an aircraft crash and inadvertent criticality, would be likely to dominate the impacts from accidents, as described in the following paragraphs.

K.2.5.1 Aircraft Crash

DOE determined that an aircraft crash into a degraded concrete storage module would be a severe accident-initiating event that could occur at the storage sites. This event would provide the potential for the airborne dispersion of radioactive material to the environment and, as a result, the potential for exposure of individuals who lived in the vicinity of the site. The aircraft crash could result in mechanical damage to the storage casks and the fuel assemblies they contained, and a fire could result. The fire would provide an additional mechanism for dispersion of the radioactive material. The frequency and consequences of this event are described in detail in DIRS 103711-Davis, Strenge, and Mishima (1998, all).

The aircraft assumed for the analysis is a midsize twin-engine commercial jet (DIRS 103711-Davis, Strenge, and Mishima 1998, p. 2). The area affected by a crash was computed using the DOE standard formula (DIRS 101810-DOE 1996, Chapter 6) in which the aircraft could crash directly into the side or top of the concrete storage modules, or could strike the ground in the immediate vicinity of the facility and skid into the concrete storage modules. Using this formula, the dimensions of a typical storage facility as shown in Chapter 2, Figure 2-33, and the aircraft configuration would result in an estimated aircraft crash frequency of 0.0000032 (3 in 1 million) crashes per year (DIRS 103711-Davis, Strenge, and Mishima 1998, p. 5). This frequency is within the range that DOE typically considers the design basis, which is defined by DOE as 0.000001 or greater per year (DIRS 104601-DOE 1993, p. 28).

The analysis estimated the consequences of the aircraft crash on degraded concrete storage modules. The twin-engine jet was assumed to crash into an independent spent fuel storage installation that contained 100 concrete storage modules, each containing 24 pressurized-water reactor fuel assemblies. Using the penetration methodology from DIRS 101810-DOE (1996, Chapter 6), an aircraft crash onto these concrete storage modules could penetrate 0.8 meter (2.6 feet). Because the concrete storage modules have thicker walls, the crash projectiles would not penetrate the reinforced concrete in the as-constructed form. Thus, DOE determined that the aircraft crash would not cause meaningful consequences until the concrete storage modules were considerably degraded, when an aircraft projectile could penetrate a concrete storage module and damage a storage cask (DIRS 103711-Davis, Strenge, and Mishima 1998, p. 7). The degradation process is highly location-dependent, as noted in Section K.2.1.1. For sites in

northern climates, the degradation would be relatively rapid due to the freeze/thaw cycling that would expedite concrete breakup; considerable degradation could occur in 200 to 300 years. For southern climates, the degradation would be much slower. Thus, an aircraft crash probably would not result in meaningful consequences for a few hundred to a few thousand years, depending on location. The timing is of some importance because the radioactive materials in the fuel would decay over time, and the potential for radiation exposure would decline with the decay.

The analysis assumed that the aircraft crash occurred 1,000 years after the termination of institutional control at a facility where the concrete had degraded sufficiently to allow breach of the dry storage canister. Computing public impacts from the air crash event requires estimating the population to a distance of 80 kilometers (50 miles) from a hypothetical site (the distance beyond which impacts from an airborne release would be very small). This analysis considered two such sites, one in an area of a high population site and one in an area of low population. The average population around all of the sites in each of the five regions defined in Figure K-2 was computed based on 1990 census data. The average ranged from a high of 330 persons per square mile in region 1 (high population) to a low of 77 persons per square mile in region 4 (low population). Both of these population densities (assumed to be uniform around the hypothetical sites) were used in the consequence calculation.

Estimating the amount of airborne respirable particles that would result from a crash requires assumptions about the impact and resulting fire. The impact of the jet engines probably would cause extensive damage to the fuel assemblies in the degraded concrete storage module. The fuel tanks in the aircraft would rupture, and fuel would disperse around the site, collect in pools, and ignite into a fire. The estimated fraction of the fuel converted to respirable airborne dust would be 0.12 percent (DIRS 103711-Davis, Strenge, and Mishima 1998, p. 9). The fire would cause a thermal updraft that could loft the fuel pellet dust into the atmosphere.

The consequences from the event were computed with the MACCS2 program (DIRS 101897-Jow et al. 1990, all). This model has been used extensively by the Nuclear Regulatory Commission and DOE to estimate impacts from accident scenarios involving releases of radioactive materials. The model computes dose to the public from the direct radiation by the cloud of radioactive particles released during the accident, from inhaling particles, and from consuming food produced from crops and grazing land that could be contaminated as the particles are deposited on the ground from the passing cloud. The food production and consumption rates are based on generic U.S. values (DIRS 103776-Kennedy and Strenge 1992, pp 6.19 to 6.28; DIRS 103168-Chanin and Young 1998, all). The program computes the dispersion of the particles as the cloud moves downwind. The dispersion would depend on the weather conditions (primarily wind speed, stability, and direction) that existed at the time of the accident. This calculation assumed median weather conditions and used annual weather data from airports near the centers of the regions.

K.2.5.2 Criticality

DOE evaluated the potential for nuclear criticality accidents involving stored spent nuclear fuel. A criticality accident is not possible in high-level radioactive waste because most of the fissionable atoms were removed or the density of fissionable atoms was reduced by the addition of glass matrix. Nuclear criticality is the generation of energy by the fissioning (splitting) of atoms as a result of collisions with neutrons. The energy release rate from the criticality event can be very low or very high, depending on several factors, including the concentration of fissionable atoms, the availability of moderating materials to slow the neutrons to a speed that enables them to collide with the fissionable atoms, and the presence of materials that can absorb neutrons, thus reducing the number of fission events.

Criticality events are of concern because under some conditions they could result in an abrupt release of radioactive material to the environment. If the event were energetic enough, the dry storage canister

could split open, fuel cladding failure could occur, and fragmentation of the uranium dioxide fuel pellets could occur.

The designs of existing dry storage systems for spent nuclear fuel, in accordance with Nuclear Regulatory Commission regulations (10 CFR Part 72) preclude criticality events by various measures, including primarily the prevention of water entering the dry storage canister. If water is excluded, a criticality cannot occur.

If institutional control was maintained at the dry storage facilities (Scenario 1), a criticality is not plausible because the casks would be monitored and maintained such that introduction of water into the canister would not be possible. However, under Scenario 2, eventual degradation (corrosion) of the dry storage canisters could lead to the entry of water from precipitation, at which point criticality could be possible if other conditions were met simultaneously.

The analysis considered three separate criticality events:

- A low-energy event that involved a criticality lasting over an intermediate period (minutes or more). This event would not produce high temperatures or generate large additional quantities of radionuclides. Thus, no fuel cladding failures and no meaningful increase in consequences would be likely.
- An event in which a system went critical but at a slow enough rate so the energy release would not be large enough to produce steam, which would terminate the event. This event could continue over a relatively long period (minutes to hours), and would differ from the low-energy event in that the total number of fissions could be very large, and a large increase in radionuclide inventory could result. This increase could double the fission product content of the spent nuclear fuel. No fuel cladding failures would be likely in this event, so no abrupt release of radionuclides would occur.
- An energetic event in which a system went critical and produced considerable fission energy. This event could occur if seriously degraded fuel elements collapsed abruptly to the bottom of the canister in the presence of water that had penetrated the canister. This event would produce high fuel temperatures that could lead to cladding rupture and fuel pellet oxidation. The radiotoxicity of the radionuclide inventory produced by the fission process would be comparable to the inventory in the fuel before the event.

The probability of a criticality occurring as described in these scenarios is highly uncertain. However, DOE expects the probability would be higher for the first two events, and much lower for the third (energetic energy release). Several conditions would have to be met for any of the three events to occur. The concrete storage module and dry storage canister must have degraded such that water could enter but not drain out. The fuel would have to contain sufficient fissionable atoms (uranium-235, plutonium 239) to allow criticality. This would depend on initial enrichment (initial concentration of uranium-235) and burnup of the fuel in the reactor before storage (which would reduce the uranium-235 concentration). Because a small amount of spent nuclear fuel would be likely to have appropriate enrichment burnup combinations that could enable criticality to occur, none of the criticality events can be completely ruled out. The energetic criticality event is the only one with the potential to produce large impacts. Such an event would be possible, but would be highly unlikely; its consequences would be uncertain. The event could cause a prompt release of radionuclides. However, the amount released would not be likely to exceed that released by the aircraft crash event evaluated above. Thus, this analysis did not evaluate specific consequences of a criticality event.

K.3 Results

K.3.1 RADIOLOGICAL IMPACTS

Impacts to human health from long-term environmental releases and human intrusion were estimated using the methods described in Section K.2 and in supporting technical documents (DIRS 101925-Sinkowski 1998, all; DIRS 101852-Jenkins 1998, all; DIRS 104597-Battelle 1998, all; DIRS 101910, 101911-Poe 1998, all; DIRS 101912-Poe and Wise 1998, all; DIRS 101935-Toblin 1999, all; DIRS 101936-Toblin 1999, all; DIRS 101937-Toblin 1998, all). The radiological impacts on human health would include internal exposures due to the intake of radioactive materials released to surface water and groundwater.

Six of the seven radionuclides listed in Table K-4 would contribute more than 99 percent of the total dose. Table K-11 lists the estimated radiological impacts by region during the last 9,900 years under Scenario 2 for the Proposed Action and Module 1 inventories of spent nuclear fuel and high-level radioactive waste. As noted above, these

impacts would be to the public from drinking water from the major waterways contaminated by surface-water runoff of radioactive materials from degraded spent nuclear fuel and high-level radioactive waste storage facilities (DIRS 101935-Toblin 1999, all; DIRS 101936-Toblin 1999, all).

Figure K-7 shows the locations of all commercial nuclear and DOE waste storage sites in the United States and more than 20 potentially affected major waterways. At present, 30.5 million people are served by municipal water systems with intakes along the potentially affected portions of these waterways. Over the 9,900-year analysis period, about 140 generations would be potentially affected. However, because releases are not estimated to occur during about the first 1,000 years for most regions, the potential affected population could be as high as 3.9 billion.

SCENARIO 2 IMPACTS

The principal long-term human health consequences from the storage of spent nuclear fuel and high-level radioactive waste would result from rainwater flowing through degraded storage facilities where it would dissolve the material. The dissolved material would travel through groundwater and surface-water runoff to rivers and streams where people could use it for domestic purposes such as drinking water and crop irrigation. The Scenario 2 analysis estimated population impacts resulting only from the consumption of contaminated drinking water and exposures resulting from land contamination due to periodic flooding, although other pathways, such as eating contaminated fish, could contribute additional impacts larger than those from drinking water for selected individuals in the exposed population.

Table K-11 indicates the variability of collective doses and potential impacts in the five regions analyzed (see Section K.2.1.6). The variability among regions is due to differences in types and quantities of spent nuclear fuel and high-level radioactive waste, annual precipitation, size of affected populations, and surface-water bodies available to transport the radioactive material.

Table K-11 also indicates that the Proposed Action inventory would produce a collective drinking water dose of 6.6 million person-rem over 9,900 years, which could result in an additional 3,300 latent cancer fatalities in the total potentially exposed population of 3.9 billion, in which about 900 million fatal cancers [using the lifetime fatal cancer risk of 24 percent (DIRS 101849-NCHS 1993, p. 5)] would be likely to occur from all other causes. Figures K-8 and K-9 show the Proposed Action inventory regional collective doses and potential latent cancer fatalities, respectively, for approximately 140 consecutive 70-year lifetimes that would occur during the 9,900-year analysis period. The peaks shown in Figures K-8 and K-9 would result from the combination of the sites that drain to the Mississippi River and the relatively large populations potentially affected along these waterways. These values include

Table K-11. Estimated collective radiological impacts to the public from continued storage of Proposed Action and Module 1 inventories of spent nuclear fuel and high-level radioactive waste at commercial and DOE storage facilities – Scenario 2.^a

Region	9,900-year population dose ^b (person-rem)		9,900-year LCFs		Years until peak impact ^c	
	Proposed Action	Module 1	Proposed Action	Module 1	Proposed Action	Module 1
1	1,800,000	1,820,000	900	900	1,400	1,400
2	760,000	1,260,000	380	630	5,100	8,300
3	3,500,000	3,650,000	1,800	1,830	3,400 ^d	3,400 ^d
4	70,000	138,000	30	69	3,900	3,900
5	460,000	461,000	230	230	7,100	7,000
Totals	6,590,000	7,330,000	3,340	3,700		

- a. Total population (collective) dose from drinking water pathway over 9,900 years.
- b. LCF = latent cancer fatality; additional number of latent cancer fatalities for the exposed population group based on an assumed risk of 0.0005 latent cancer fatality per person-rem of collective dose (DIRS 101857-NCRP 1993, p. 112).
- c. Years after 2116 when the maximum doses would occur.
- d. Year of combined U.S. peak impact would be the same as for Region 3 peak impact, because the predominant impact would be in Region 3.

impacts for the Proposed Action inventory only. Similar curves for the Module 1 inventory are not shown because of their similarity to those for the Proposed Action inventory. As listed in Table K-11, the impacts from the Module 1 inventory would be approximately 20 percent greater than for the Proposed Action inventory.

The additional 3,300 Proposed Action latent cancer fatalities (or 3,700 Module 1 latent cancer fatalities) over the 10,000-year analysis period would not be the only negative impact. Under Scenario 2, more than 20 major waterways of the United States (for example, the Great Lakes, the Mississippi, Ohio, and Columbia rivers, and many smaller rivers along the Eastern Seaboard) that currently supply domestic water to 30.5 million people would be contaminated with radioactive material. The shorelines of these waterways would be contaminated with long-lived radioactive materials (plutonium, uranium, americium, etc.) that would result in exposures to individuals who came into contact with the sediments, potentially increasing the number of latent cancer fatalities. Each of the 72 commercial and 5 DOE sites throughout the United States would have potentially hundreds of acres of land and underlying groundwater systems contaminated with radioactive materials at concentrations that would be potentially lethal to anyone who settled near the degraded storage facilities. The radioactive materials at the degraded facilities and in the floodplains and sediments would persist for hundreds of thousands of years.

As mentioned above, DOE only estimated potential collective impacts resulting from the consumption of contaminated surface water. However, other pathways (food consumption, contaminated floodplains, etc.) that could contribute to collective dose were evaluated (DIRS 101936-Toblin 1999, all; DIRS 150990-Rollins 1998, all) to determine their relative importance to the drinking water pathway. These pathways included the following:

- Consumption of vegetables irrigated with contaminated water
- Consumption of meat and milk from animals that drank contaminated water or were fed with contaminated feed
- Consumption of contaminated finfish and shellfish
- Direct exposure to contaminated shoreline sediments
- Exposures resulting from contamination of floodplains during periods of high stream (river) flow

These analyses determined that an individual living in a contaminated floodplain and consuming vegetables irrigated with contaminated surface water could receive a radiation exposure dose three times

K-30

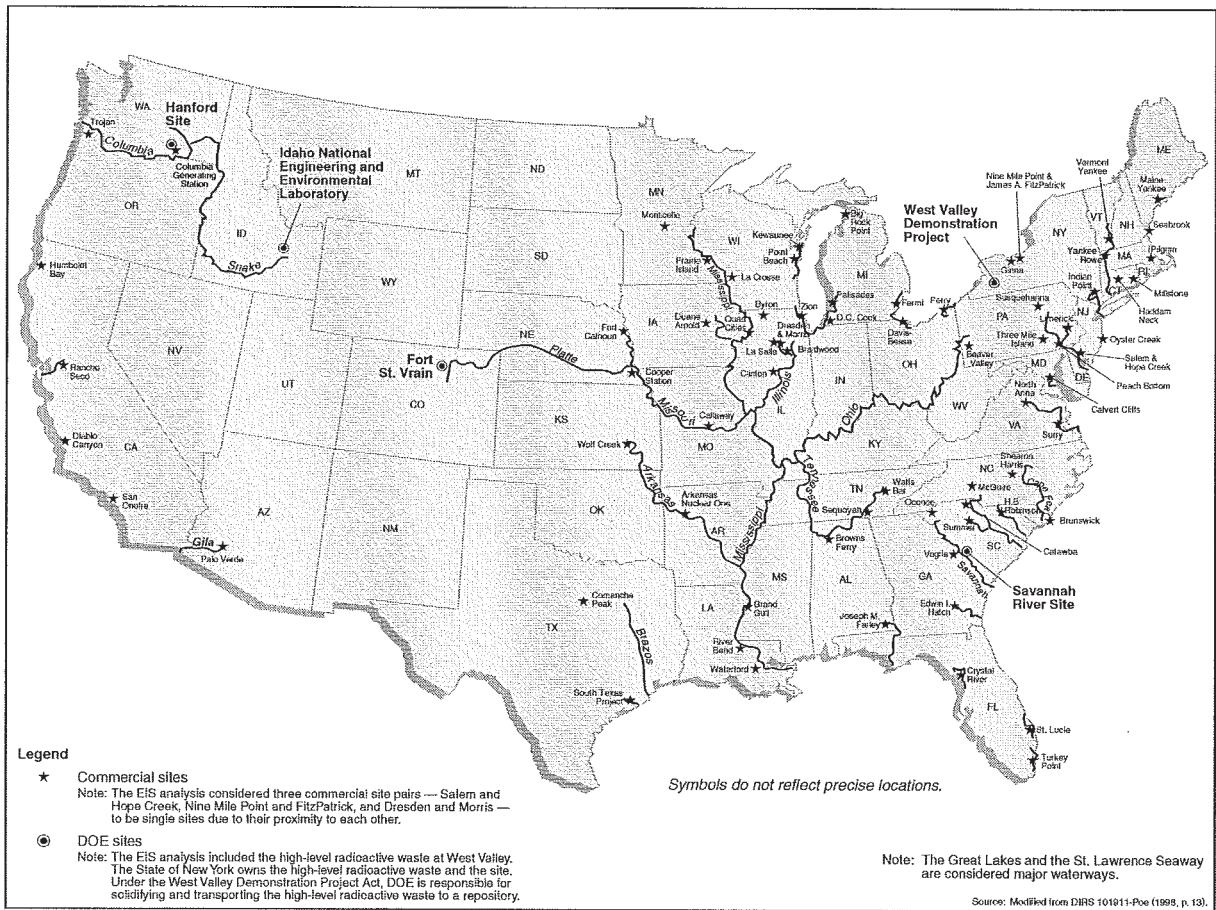


Figure K-7. Major waterways near commercial and DOE sites.

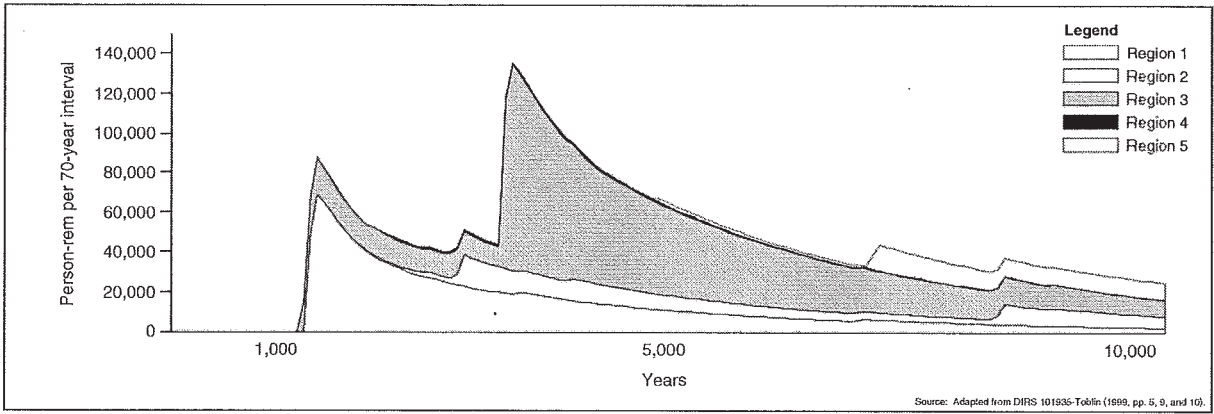


Figure K-8. Regional collective dose from the Proposed Action inventory under No-Action Scenario 2.

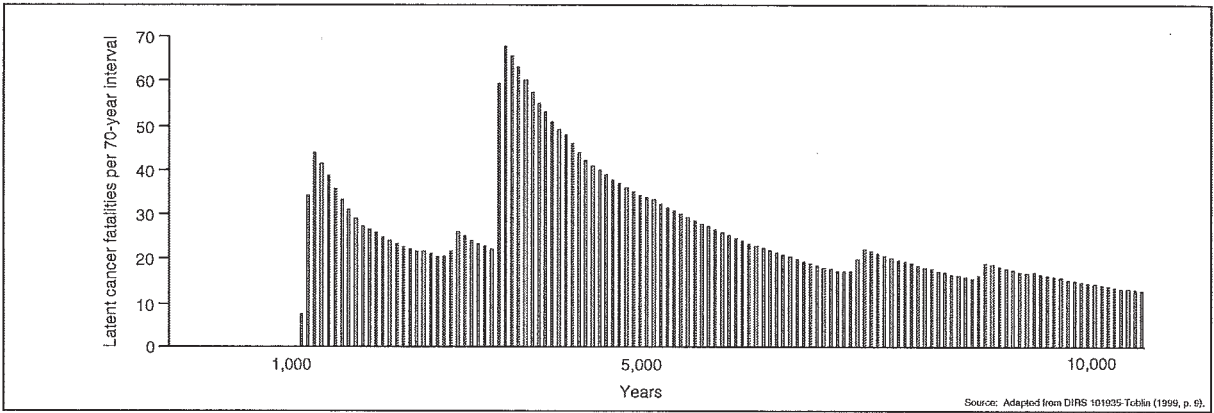


Figure K-9. Total potential latent cancer fatalities throughout the United States from the Proposed Action inventory under No-Action Scenario 2.

higher than that from the consumption of contaminated surface water only (DIRS 101936-Toblin 1999, p. 3). In addition, the analysis determined that impacts to 30 million individuals potentially living in contaminated floodplains would be less than 10 percent of the collective impacts shown in Figure K-9 and, therefore, did not include them in the estimates because DOE did not want to overestimate the impacts from Scenario 2.

DOE evaluated airborne pathways (DIRS 147905-Mishima 1998, all) and judged that potential impacts from those pathways would be very small in comparison to impacts from liquid pathways because the degraded facility structures would protect the radioactive material from winds. To simplify the analysis, impacts to the public from radiation emanating from the degraded storage facilities were not included. Those impacts were judged to represent a small fraction of the impacts calculated for the liquid pathways (Table K-11).

Estimates of localized impacts (DIRS 101937-Toblin 1998, p. 1) assumed that individuals (onsite and near-site gardeners) would take up residence near the degraded storage facilities and would consume vegetables from their gardens irrigated with groundwater withdrawn from the contaminated aquifer directly below their locations. In addition, the onsite gardener would be exposed to external radiation emanating from the exposed dry storage canisters; therefore, the onsite gardener would be the maximally exposed individual.

Table K-12 lists the internal estimated dose rates (see Section K.2.4.1 for details) and the times for peak exposure for each of the five regions.

Table K-12. Estimated internal dose rates (rem per year) and year of peak exposure^a (in parentheses) for the onsite and near-site gardeners – Scenario 2.^b

Region	Maximally exposed individual distances (meters) ^c from storage facilities			
	10 ^d	150	1,000	5,000
1	3,100 (1,800)	670 (2,200)	51 (2,000)	12 (2,600)
2	100 (2,700)	96 (2,000)	12 (2,900)	2 (7,100)
3	3,100 (1,800)	1,800 (2,000)	150 (2,600)	31 (6,000)
4	140 (3,200)	130 (3,900)	14 (4,800)	2 (9,300)
5	3,300 (4,600)	180 (5,300)	59 (5,300)	2 (6,100)

- a. Years after facility maintenance ended.
- b. Source: Adapted from DIRS 101937-Toblin (1998, Table 4, p. 5).
- c. To convert meters to feet, multiply by 3.2808.
- d. The maximally exposed individual would be the onsite gardener.

The regional dose rates listed in Table K-12 would depend on the concentration of contaminants (primarily plutonium) in the underlying aquifer from which water was extracted and used by the gardener for consumption and crop irrigation. These aquifer concentrations, in turn, would be affected by the type and location of stored materials (spent nuclear fuel and high-level radioactive waste) in each region, the rate at which the contaminants were leached from the stored material, the amount of water (precipitation) available for dilution, and the thickness of the aquifer. For example, releases in Region 5 would probably be smaller and would occur later than those in other regions because of the region's lack of precipitation. This is indeed the case for commercial fuel, which is stored in above-grade concrete storage modules, stainless-steel dry storage canisters, and mostly intact corrosion-resistant zirconium alloy cladding.

However, early releases would occur in Region 5 because most DOE spent nuclear fuel is stored in below-grade vaults (see Appendix A, p. A-25) that would stop providing rain protection after 50 years (see Section K.2.1.1 for details). In addition, the analysis assumed no credit for the protectiveness of the DOE spent nuclear fuel cladding (see Section K.2.1.4.2 for details), which would result in releases that

began early (about 800 years after weather protection was lost) and persist at a nearly constant rate for more than 6,000 years (DIRS 101937-Toblin 1998, p. 3).

The 10-meter (33-foot) doses listed in Table K-12 would be due to leachate concentrations from the storage area with no groundwater dilution. Downgradient doses decrease more rapidly in Regions 1 and 5 than in other regions because of greater groundwater dilution. The downgradient decrease in Region 5 would also be due to the relatively thick aquifer, which results in greater vertical plume spread and increases plume attenuation (DIRS 101937-Toblin 1998, pp. 4 to 6).

As shown in Table K-12, an onsite gardener in Region 5 could receive an internal committed dose as high as 3,300 rem for each year of ingestion of plutonium-239 and -240. However, the individual actually would receive only about 70 rem the first year, 140 rem the second year, 210 rem the third year, and so on until reaching an equilibrium annual dose (in approximately 50 years) of 3,300 rem per year. The individual would continue to receive this equilibrium dose as long as the radioactive material uptake remained constant.

If the annual doses are added, in less than 10 years the individual would have received more than 2,000 rem. If the International Commission on Radiological Protection risk conversion factor were applied to this dose, a probability of fatal cancer induction of 1 could be calculated. In other words, the use of this risk conversion would predict that 10 years of exposure would be virtually certain to produce a fatal cancer. This calculated risk is approximately 4 times greater than the lifetime risk of contracting a fatal cancer from all other causes (24 percent).

Table K-13 shows that the direct radiation dose rate to the onsite gardener could be as high as 7,300 rem per year. Unlike internal dose, this dose would actually be delivered during the year of exposure. This maximum value assumes a complete loss of shielding normally provided by the concrete storage module at the same time as the loss of weather protection (see Table K-1). Assuming a dose of 7,300 rem per year, the individual probably would die from acute radiation exposure. This dose would probably cause extensive cell damage in the individual that would result in severe acute adverse health conditions and death within weeks or months (DIRS 106184-NRC 1996, p. 8.29-5). However, these higher radiation dose rates are based on an early estimated time to structural failure of the concrete storage module. If these failure times were extended by as little as 100 years, the associated dose rates would decrease by a factor of 10 because the levels of radiation emanating from the degraded facilities would have decreased by about a factor of 10 due to radioactive decay (DIRS 150990-Rollins 1998, p. 12).

Table K-13. Estimated external peak dose rates (rem per year) for the onsite and near-site gardeners – Scenario 2.

Region	Year of peak exposure ^b	Maximally exposed individual distances (meters) ^a from storage facilities			
		10 ^c	150	1,000	5,000
1	190	7,200	4	0.001	0.0
2	800	28	0.04	0.0	0.0
3	170	7,300	4	0.001	0.0
4	850	31	0.04	0.0	0.0
5	3,600	32	0.05	0.0	0.0

a. To convert meters to feet, multiply by 3.2808.

b. Years after 2116; Source: Adapted from DIRS 101910-Poe (1998, all).

c. Source: Adapted from (DIRS 101556-Davis 1998, all); the maximally exposed individual would be the onsite gardener.

The internal and external dose rates are presented separately because they would occur at different times and are therefore not additive.

K.3.2 UNUSUAL EVENTS

This section includes a quantitative assessment of potential accident impacts and a qualitative discussion of the impacts of sabotage.

K.3.2.1 Accident Scenarios

The analysis examined the impacts of accident scenarios that could occur during the above-ground storage of spent nuclear fuel and high-level radioactive waste and concluded that the most severe accident scenarios would be an aircraft crash into concrete storage modules or a severe seismic event. In Scenario 1, where storage would be in strong rigid concrete storage modules that had not degraded, the accident would not be expected to release radioactive material.

In Scenario 2, the concrete storage modules would deteriorate with time. If a severe natural event (for example, a hurricane) were to strike a degraded facility, a release of radioactive materials could occur earlier than predicted (see Section K.2) because of damage to the engineered barriers (concrete storage modules, dry storage canisters, material cladding, etc.). Section K.4 describes the potential effect of early loss of these barriers (see Table K-15 in Section K.4.3.1). However, DOE concluded that an aircraft crash into degraded concrete storage modules would dominate the consequences. The analysis evaluated the potential for criticality accidents and concluded that an event severe enough to produce meaningful consequences would be extremely unlikely, and that the consequences would be bounded by the aircraft crash consequences. Table K-14 lists the consequences of an aircraft crash on a degraded spent fuel concrete storage module.

Table K-14. Consequences of aircraft crash onto degraded spent nuclear fuel concrete storage module.^a

Factor	High-population site ^b	Low-population site ^c
Frequency (per year)	3.2 x 10 ⁻⁶	3.2 x 10 ⁻⁶
Collective population dose (person-rem)	26,000	6,000
Latent cancer fatalities	13	3

a. Source: DIRS 103711-Davis, Streng, and Mishima (1998, p. 11).

b. 330 persons per square mile.

c. 77 persons per square mile.

K.3.2.2 Sabotage

Storage of spent nuclear fuel and high-level radioactive waste over 10,000 years would entail a continued risk of intruder access at each of the 77 sites. Sabotage could result in a release of radionuclides to the environment around the facility. In addition, intruders could attempt to remove fissile material, which could result in releases of radioactive material to the environment. For Scenario 1, the analysis assumed that safeguards and security measures currently in place would remain in effect during the 10,000-year analysis period at the 77 sites. Therefore, the risk of sabotage would continue to be low. However, the difficulty of maintaining absolute control over 77 sites for 10,000 years would suggest that the cumulative risk of intruder attempts would increase.

For Scenario 2, the analysis assumed that safeguards and security measures would not be maintained at the 77 sites after approximately the first 100 years. For the remaining 9,900 years of the analysis period, the cumulative risk of intruder attempts would increase. Therefore, the risk of sabotage would increase substantially under this scenario.

K.4 Uncertainties

Section K.3 contains estimates of the radiological impacts of the No-Action Alternative, which assumes continued above-ground storage of spent nuclear fuel and high-level radioactive waste at sites across the United States. Associated with the impact estimates are uncertainties typical of predictions of the outcome of complex physical and biological phenomena and of the future state of society and societal institutions over long periods. DOE recognized this fact from the onset of the analysis; however, the predictions will be valuable in the decisionmaking process because they provide insight based on the best information and scientific judgments available.

This analysis considered five aspects of uncertainty:

- Uncertainties about the nature of changes in society and its institutions and values, in the physical environment, and of technology as technology progresses
- Uncertainties associated with future human activities and lifestyles
- Uncertainties associated with the mathematical representation of the physical processes and with the data in the computer models
- Uncertainties associated with the mathematical representation of the biological processes involving the uptake and metabolism of radionuclides and the data in the computer models
- Uncertainties associated with accident scenario analysis

The following sections discuss these uncertainties in the context of possible effects on the impact estimates reported in Chapter 7 and Section K.3.

K.4.1 SOCIETAL VALUES, NATURAL EVENTS, AND IMPROVEMENTS IN TECHNOLOGY

K.4.1.1 Societal Values

History is marked by periods of great social upheaval and anarchy followed by periods of relative political stability and peace. Throughout history, governments have ended abruptly, resulting in social instability, including some level of lawlessness and anarchy. The Scenario 1 assumption is that political stability would exist to the extent necessary to ensure adequate institutional control to monitor and maintain the spent nuclear fuel and high-level radioactive waste to protect the workers and the public for 10,000 years. The Scenario 2 assumption is that in the United States political stability would exist for 100 years into the future and that the spent nuclear fuel and high-level radioactive waste would be properly monitored and maintained and the public would be protected for this length of time. If a political upheaval were to occur in the United States, the government could have difficulty protecting and maintaining the storage facilities, and the degradation processes could begin earlier than postulated in Scenario 2. If institutional control were not maintained for at least 100 years, radioactive materials from the spent nuclear fuel and high-level radioactive waste could enter the environment earlier, which would result in higher estimated impacts due to the higher radiotoxicity of the materials. However, this scenario would probably increase overall impacts by no more than a factor of 2.

K.4.1.2 Changes in Natural Events

Because of the difficulty of predicting impacts of climate change (glaciation, precipitation, global warming), DOE decided to evaluate facility degradation and environmental transport mechanisms based on current climate conditions. For example, glaciation, which many scientists agree will occur again

within 100,000 years, probably would cover the northeastern United States with a sheet of ice. The ice would crush all structures, including spent nuclear fuel and high-level radioactive waste storage facilities, and could either disperse the radioactive materials in the accessible environment or trap the materials in the ice sheet. In addition, large populations would migrate from the northeastern United States to warmer climates, thus changing the population distribution and densities throughout the United States (the coastline could move 100 miles out from its current position due to the reduced water in the oceans). Other scientists predict that global warming could lead to extensive flooding of low-lying coastal areas throughout the world. Such changes would have to be known with some degree of certainty to make accurate estimates of potential impacts associated with the release of spent nuclear fuel and high-level radioactive waste materials to the environment. To simplify the analysis, DOE has chosen not to attempt to quantify the impacts resulting from the almost certain climate changes that will occur during the analysis period.

K.4.1.3 Improvements in Technology

We are living in a time of unparalleled technical advancement. It is possible that cures for many common cancers will be found in the coming decades. In this regard, the National Council on Radiation Protection and Measurements (DIRS 101858-NCRP 1995, p. 51) states that:

One of the most important factors likely to affect the significance of radiation dose in the centuries and millennia to come is the effect of progress in medical technology. At some future time, it is possible that a greater proportion of somatic [cancer] diseases caused by radiation will be treated successfully. If, in fact, an increased proportion of the adverse health effects of radiation prove to be either preventable or curable by advances in medical science, the estimates of long-term detriments may need to be revised as the consequences (risks) of doses to future populations could be very different.

Effective cures for cancer would affect the fundamental premise on which the No-Action Alternative impact analysis is based. However, this technology change was not included in the impact analyses.

Other advancements in technology could include advancements in water purification that could reduce the concentration of contaminants in drinking water supplies. Improved corrosion-resistant materials could reduce package degradation rates, which could reduce the release of contaminants and the resultant impacts. In addition, future technology could enable the detoxification of the spent nuclear fuel and high-level radioactive waste materials, thereby removing the risks associated with human exposure.

K.4.2 CHANGES IN HUMAN BEHAVIOR

General guidance for the prediction of the evolution of society has been provided by the National Research Council in *Technical Bases for Yucca Mountain Standards* (DIRS 100018-National Research Council 1995, pp. 28 and 70), in which the Committee on Technical Bases for Yucca Mountain Standards concluded that there is no scientific basis for predicting future human behavior. The study recommends policy decisions that specify the use of default (or reference) scenarios to incorporate future human behaviors into compliance assessment calculations. This No-Action Alternative analysis followed this approach, based on societal conditions as they exist today. In doing so, the analysis assumed that populations would remain at their present locations and that population densities would remain at the current levels. This assumption is appropriate when estimating impacts for comparison with other proposed actions; however, it does not reflect reality.

Although this analysis did not project the affected populations used in the No-Action Alternative to 2035, as DOE has done in other parts of the EIS, the potential effect on the outcome would be an increase in collective impacts of less than a factor of 1.5, which is the average expected increase in national population from 1990 to 2035 (DIRS 152471-Bureau of the Census 2000, all). In addition to changing in

size, populations are constantly moving. If, for example, populations were to move closer to and increase in size in areas near the storage facilities, the radiation dose and resultant adverse impacts could increase substantially. However, DOE has no way to predict such changes accurately and, therefore, did not attempt to quantify the resultant effects on overall impacts.

Another lifestyle change that could affect the overall impacts would involve food consumption patterns. For example, people might curtail their use of public water supplies derived from rivers if they learned that the river water carried carcinogens. Widespread adoption of such practices could reduce the impacts associated with the drinking water pathway.

K.4.3 MATHEMATICAL REPRESENTATIONS OF PHYSICAL PROCESSES AND OF THE DATA INPUT

The DOE approach for the No-Action Alternative was to be as comparable as possible to the approach used for the predictions of impacts from the proposed Yucca Mountain Repository to enable direct comparisons of the impact estimates for the two cases. Therefore, the analysis either used the process models developed for the TSPA-VA directly or adapted them for the No-Action Alternative impact calculations. For processes that were different from those treated in the TSPA-VA, DOE developed analytical approaches.

In a general sense, the TSPA-VA calculations used a stochastic (random) approach to develop radiological impact estimates. Existing process models were used to generate a set of responses for a particular process. In the TSPA-VA process, the impact calculations sample each set of process responses and calculate a particular impact result. A large number of calculations were performed. From the set of variable results, an expected value can be identified, as can a distribution of results that is an indication of the uncertainties in the calculated expected values.

For the No-Action Alternative analysis, the calculations were based on only a single set of best estimate parameters. No statistical distribution of results was generated as a basis for the quantification of uncertainties. This section describes the uncertainties associated with the input data and modeling used to evaluate the rates of degradation of the materials considered in this document and to estimate the impacts of the resulting releases. It describes the key assumptions, shows where the assumptions are consistent with TSPA-VA assumptions, and qualitatively assesses the magnitude of the uncertainties caused by the assumptions.

Calculating the radiological impacts to human receptors required a mathematical representation of physical processes (for example, water movement) and data input (for example, material porosity). There are uncertainties in both the mathematical representations and in the values of data. The TSPA-VA accommodates these uncertainties by using a probabilistic approach to incorporate the uncertainties, whereas the No-Action analysis uses a deterministic approach in combination with an uncertainty analysis. When done correctly, both approaches yield the same information, although, as in the case of the TSPA-VA, the probabilistic approach provides quantitative information.

K.4.3.1 Waste Package and Material Degradation

The major approaches and assumptions used for the No-Action Scenario 2 analysis are listed in Table K-15. The table indicates where the continued storage calculations followed the basic methods developed for the TSPA-VA. It also indicates the processes for which models other than those used in the TSPA-VA were applied.

DOE analyzed surface storage of commercial spent nuclear fuel in horizontal stainless-steel canisters inside concrete storage modules. There are other probable forms of storage, including horizontal and

Table K-15. Review of approaches, assumptions, and related uncertainties^a (page 1 of 2).

Approach or assumption	Consistent with repository analysis assumptions	Sensitivity of impacts to approach or assumption ^b
Period of analysis – 10,000 years	Yes	None
Commercial spent nuclear fuel, DOE spent nuclear fuel, and high-level radioactive waste quantities equivalent to NWPA specified 70,000 MTHM and Module 1	Yes	None
No credit for stainless-steel cladding on commercial spent nuclear fuel	Yes	If credit were taken for stainless-steel cladding, LCFs ^a could decrease by as much as a factor of 10.
0.1 percent of zirconium alloy cladding is initially failed	Yes	If initial zirconium-alloy-clad fuel cladding failure had been assumed to be as low as zero or as high as 100 percent impacts could have been slightly smaller (additional protection from winds) to a factor of 20 higher, respectively.
Concrete storage module weather protection	This is a primary protective barrier for the No-Action analysis and is not applicable to TSPA	If weather protection from the concrete storage module had not been assumed in the No-Action analysis, LCFs could be higher by less than a factor of 10.
Concrete base pad degradation	Not applicable	Used NRC recommended values (probably overestimated degradation and reduced consequences in the No-Action analysis); increase in LCFs by probably more than a factor of 2 but less than a factor of 10
Credit for stainless-steel canister on high-level radioactive waste	No; TSPA does not take credit for stainless-steel container	If the No-Action analysis had not taken credit for the stainless-steel canister, LCFs would change very little (slight increase) because of the intrinsic stability of the borosilicate glass.
DOE spent nuclear fuel evaluated by a representative surrogate that is based mostly on DOE N-Reactor spent nuclear fuel (other spent nuclear fuel types not evaluated)	Yes	If actual fuel types were evaluated, LCFs could either increase or decrease by less than a factor of 2.
No credit given for zirconium alloy cladding on N-Reactor spent nuclear fuel	Yes	If credit was given for the N-Reactor zirconium alloy cladding, the LCFs would decrease by less than a factor of 2.
Stainless steel deterioration	Model paralleled TSPA approach for Alloy-22	Model based on best information; if incorrect and corrosion proceeds more rapidly and stainless steel offers no protection, LCFs would increase by less than 25 percent.
Zirconium alloy cladding deterioration	Yes, very slow corrosion rate.	If the No-Action analysis had assumed larger or smaller deterioration rates, LCFs could have increased by several orders of magnitude or decreased by less than a factor of 2.
Zirconium alloy cladding credit	Yes	If the No-Action analysis had not taken credit for zirconium alloy cladding, LCFs could have increased by as much as 2 orders of magnitude.
Deterioration of spent nuclear fuel and high-level radioactive waste core materials	Yes	None

Table K-15. Review of approaches, assumptions, and related uncertainties^a (page 2 of 2).

Approach or assumption	Consistent with repository analysis assumptions	Sensitivity of impacts to approach or assumption ^b
Use of recent regional climate conditions to determine deterioration (temperature, precipitation, etc.)	No; No-Action analysis used constant "effective" regional weather parameters weighted for material inventories and potentially affected downstream populations; TSPA used actual weather patterns measured at Yucca Mountain. The TSPA also assumed long-term climate changes would occur in the form of increased precipitation.	If actual site climate data and projected future potential climate changes had been considered in the No-Action analysis, LCFs could have increased or decreased by as much as a factor of 10. Climate change assumptions such as a glacier covering most of the northeastern seaboard of the United States would have made estimating impacts from continued storage virtually impossible.
Surface transport by precipitation	Not applicable; TSPA only considered groundwater transport because there is no surface-water transport pathway possible for the repository.	If the No-Action analysis had not considered the groundwater transport pathway, LCFs could have been as much as a factor of 10 higher.
Regional binning of sites – not specific site parameters	Not applicable; TSPA considered only a single site; the No-Action analysis evaluated potential impacts from 77 sites on a regional basis.	The No-Action analysis binned sites into categories and developed "effective" regional climate conditions such that calculated impacts would be comparable to those which could be calculated by a site-specific analysis.
Atmospheric dose consequences judged to be small when compared to liquid pathways.	Yes	Small impact on LCFs.
Drinking water doses	Yes; primary pathway evaluated	Use of drinking-water-only pathway underestimates total collective LCFs by less than a factor of 3.
Used the Multimedia Environmental Pollutant Assessment System ^c modeling approach for calculating population uptake/ingestion	No; TSPA uses GENII-S. ^d GENII-S uses local survey data; the Multimedia Environmental Pollutant Assessment System uses EPA/NRC exposure/uptake default and actual population data	No impact. The two programs yield comparable results as used in these analyses.
ICRP ^e approach to calculate dose commitment from ingested radionuclides	Yes	No impact.
Human health impacts calculated as LCFs with NCRP ^f conversion factors	NA; TSPA does not estimate LCFs.	Use of other than the linear no-threshold model could result in a change in estimated LCFs from 0.25 to 2 times the nominal value. ^g

- a. Abbreviations: NWPA = Nuclear Waste Policy Act; MTHM = metric tons of heavy metal; LCF = latent cancer fatality; TSPA = Total System Performance Assessment; NRC = Nuclear Regulatory Commission; ICRP = International Commission on Radiological Protection; EPA = Environmental Protection Agency.
- b. Sensitivity of impacts to approach/assumption is based on professional judgement and, if applicable, the effects of the approaches/assumptions on calculations.
- c. DIRS 101533-Buck et al. (1995, all).
- d. DIRS 100464-Leigh et al. (1993, all).
- e. DIRS 110386-ICRP (1979, all).
- f. DIRS 101857-NCRP (1993, p. 112).
- g. DIRS 101884-NCRP (1997, p. 75).

vertical casks made of materials ranging from stainless steel to carbon steel. Degradation and releases from vertical carbon-steel casks were evaluated qualitatively. Such storage units would be likely to fail from corrosion earlier than concrete and stainless steel. The concrete and stainless-steel units were calculated to fail and begin releasing their contents at about 1,000 years after the assumed loss of institutional control. The less-resistant carbon-steel units could begin releasing their contents earlier and their use would result in a longer period of release and increased impacts. This difference is likely to be an increase of 10 to 30 percent in population dose commitment and resultant latent cancer fatalities.

K.4.3.2 Human Health Effects

The dose-to-risk conversion factors typically used to estimate adverse human health impacts resulting from radiation exposures contain considerable uncertainty. The risk conversion factor of 0.0005 latent cancer fatality per person-rem of collective dose for the general public typically used in DOE National Environmental Policy Act documents is based on recommendations of the International Commission on Radiological Protection (DIRS 101836-ICRP 1991, p. 22) and the National Council on Radiation Protection and Measurements (DIRS 101857-NCRP 1993, p. 112). The factor is based on health effects observed in the high dose and high dose rate region (20 to 50 rem per year). Health effects were extrapolated to the low-dose region (less than 10 rem per year) using the linear no-threshold model. This model is generally recommended by the International Commission on Radiological Protection and the National Council of Radiation Protection and Measurements, and most radiation protection professionals believe this model produces a conservative estimate (that is, an overestimate) of health effects in the low-dose region, which is the exposure region associated with continued storage of spent nuclear fuel and high-level radioactive waste. This report summarizes estimates of the impacts associated with very small chronic population doses to enable comparison of alternatives in this EIS.

According to the National Council on Radiation Protection and Measurements, the results of an analysis of the uncertainties in the risk coefficients “show a range (90 percent confidence intervals) of uncertainty values for the lifetime risk for both a population of all ages and an adult worker population from about a factor of 2.5 to 3 below and above the 50th percentile value” (DIRS 101884-NCRP 1997, p. 74).

The National Council on Radiation Protection and Measurements states, “This work indicates that given the sources of uncertainties considered here, together with an allowance for unspecified uncertainties, the values of the lifetime risk can range from about one-fourth or so to about twice the nominal values” (DIRS 101884-NCRP 1997, p. 75).

Because of the large uncertainties that exist in the dose/effect relationship, the Health Physics Society has recommended “...against quantitative estimation of health risks due to radiation exposure below a lifetime dose of 10 rem ...” (DIRS 101835-Mossman et al. 1996, p. 1). In essence, the Society has recommended against the quantification of risks due to individual radiation exposures comparable to those estimated in the No-Action analysis. These uncertainties are due, in part, to the fact that epidemiological studies have been unable to demonstrate that adverse health effects have occurred in individuals exposed to small doses (less than 10 rem per year) over a period of many years (chronic exposures) and to the fact that the extent to which cellular repair mechanisms reduce the likelihood of cancers is unknown.

Other areas of uncertainty in estimation of dose and risk include the following:

- *Uncertainties Related to Plant and Human Uptake of Radionuclides.* There are large uncertainties related to the uptake (absorption) of radionuclides by agricultural plants, particularly in the case where “regionalized,” versus “site-specific” data are used. Also of importance are variations in the absorption of specific radionuclides through the human gastrointestinal tract. Factors that influence the absorption of radionuclides include their chemical or physical form, their concentrations, and the presence of stable

elements having similar chemical properties. In the case of agricultural crops, many of these factors are site-specific.

- *Uncertainties in Dose and Risk Conversion Factors.* The magnitudes and sources of the uncertainties in the various input parameters for the analytical models need to be recognized. In addition to the factors cited above, these include those required for converting absorbed doses into equivalent doses, for calculating committed doses, and for converting organ doses into effective (whole body) doses. Although these various factors are commonly assigned point values for purposes of dose and risk estimates, each of these factors has associated uncertainties.
- *Conservatism in Various Models and Parameters.* In addition to recognizing uncertainties, one must take into account the magnitudes and sources of the conservatism in the parameters and models being used. These include the fact that the values of the tissue weighting factors and the methods for calculating committed and collective doses are based on the assumption of a linear no-threshold relationship between dose and effect. As the International Commission on Radiological Protection and the National Council on Radiation Protection and Measurements have stated, the use of the linear no-threshold hypothesis provides an upper bound on the associated risk (DIRS 147927-ICRP 1966, p. 56). Also to be considered is that the concept of committed dose could overestimate the actual dose by a factor of 2 or more (DIRS 101856-NCRP 1993, p. 25).

K.4.3.3 Accidents and Their Uncertainty

The accident methodology used in this analysis is described in Section K.2.5 for Scenarios 1 and 2. It states that for Scenario 1 an aircraft crash into the storage array would provide the most severe accident scenario and its consequences would not cause a release from the rugged concrete storage module. The analysis placed considerable weight on the quality and strength of the concrete storage module and dry storage canister. For an analysis extending 10,000 years, more severe natural events can be postulated than those used as the design basis for the dry storage canister, and they could cause failure of the canister. This could exceed the consequences estimated for Scenario 1, but it would be unlikely to exceed the consequences for the aircraft accident scenario evaluated for Scenario 2.

Section K.2.5.1 concludes that the aircraft crash on the degraded concrete storage modules would be the largest credible event that could occur. The best estimate impacts from this event ranged from 3 latent cancer fatalities for a low-population site to 13 for a high-population site. The uncertainties in these estimates are very large. As discussed above, the aircraft crash could cause a minimum of no latent cancer fatalities given the uncertainty in the model that converts doses to cancers. The maximum impact could be substantially greater than the estimated values if an aircraft crash involving the largest commercial jet occurred at the time of initial concrete storage module degradation at a specific site under adverse weather conditions (conditions that would maximize the offsite doses) involving spent fuel with the maximum expected inventory of radionuclides.

K.4.4 UNCERTAINTY SUMMARY

The sections above discuss qualitatively and semiquantitatively the uncertainties associated with impact estimates resulting from the long-term storage of spent nuclear fuel and high-level radioactive waste at multiple sites across the United States. As stated above, DOE has not attempted to quantify the variability of estimated impacts related to possible changes in climate, societal values, technology, or future lifestyles. Although uncertainties with these changes could undoubtedly affect the total consequences reported in Section K.3 by several orders of magnitude, DOE did not attempt to quantify these uncertainties to simplify the analysis.

DOE attempted to quantify a range of uncertainties associated with mathematical models and input data, and estimated the potential effect these uncertainties could have on collective human health impacts. By summing the uncertainties discussed in Sections K.4.1, K.4.2, and K.4.3 where appropriate, DOE estimates that total collective impacts over 10,000 years could have been underestimated by as much as 3 or 4 orders of magnitude. However, because there are large uncertainties in the models used for quantifying the relationship between low doses (that is, less than 10 rem) and the accompanying health impacts, especially under conditions in which the majority of the populations would be exposed at a very low dose rate, the actual collective impact could be small.

On the other hand, impacts to individuals (human intruders) who could move to the storage sites and live close to the degraded facilities could be severe. During the early period (200 to 400 years after the assumed loss of institutional control), acute exposures to external radiation from the spent nuclear fuel and high-level radioactive waste material could result in prompt fatalities. In addition, after a few thousand years onsite shallow aquifers could be contaminated to such a degree that consumption of water from these aquifers could result in severe adverse health effects, including premature death. Uncertainties related to these localized impacts are related primarily to the inability to predict accurately how many individuals could be affected at each of the 77 sites over the 10,000-year analysis period. In addition, the uncertainties associated with localized impacts would exist for potential consequences resulting from disruptive events, both manmade and natural.

Therefore, as listed in Table K-15, uncertainties resulting from future changes in natural phenomena and human behavior that cannot be predicted, process model uncertainties, and dose-effect relationships, taken together, could produce the results presented in Section K.3, overestimating or underestimating the impacts by as much as several orders of magnitude. Uncertainties of this magnitude are typical of predictions of the outcome of complex physical and biological phenomena over long periods. However, these predictions (with their uncertainties) are valuable to the decisionmaking process because they provide insight based on the best information available.

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Note: In an effort to ensure consistency among Yucca Mountain Project documents, DOE has altered the format of the references and some of the citations in the text in this Final EIS from those in the Draft EIS. The following list contains notes where applicable for references cited differently in the Draft EIS.

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