NRC-090 Submitted: 6/8/2015



### ISR Wellfield Background and Restoration Ground Water Quality Data: Collection, Statistical Analysis and Public Access

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#### NRC Regulation of Ground Water at ISR Wellfields

NRC Objective: Protect the public health, safety and the environment

To prevent contamination of ground water at ISR wellfields, NRC regulates source and 11e(2) byproduct fluids to ensure the licensee:

- Characterizes, Sites and Designs ISR wellfields to ensure conditions are adequate to contain source and byproduct fluids within the wellfield
- Establishes background water quality to determine the ground water protection standards (GWPS) for the ore zone, overlying and underlying aquifers
- Operates ISR wellfields so that all source and byproduct fluids are contained within the wellfield
- Monitors ISR wellfields so that any ground water contamination outside wellfield from source and byproduct fluids is detected and corrected.
- Restores ISR wellfields to approved ground water protection standards (GWPS)
  and demonstrates the restored water quality is stable.



## What are the GWPS that must be established before operation and met after restoration of an ISR wellfield?

NRC Regulatory Information Summary RIS 90-05.

Licensees and applicants must commit to achieve the ground water quality standards in 10 CFR Part 40, Appendix A Criterion 5B (5) for all restored aquifers which conforms to the standards promulgated by EPA in 40 CFR Part 192 Subpart D 192.32 (2).

These standards state the concentration of a hazardous constituent (Criterion 13) must not exceed:

- (a) the Commission approved background concentration of that constituent in ground water;
- (b) the respective value in the table in paragraph 5C if the constituent is listed in the table and if the background level of the constituent is below the value listed or;
- (c) an alternative concentration limit established by the Commission.



#### I. ISR Wellfield Background Ground Water Quality Collection



### What ground water quality is collected in the ISR wellfield?

- The background water quality of all constituents of concern (COC) in the ore zone aquifer and ore zone perimeter ring monitoring wells in the ISR wellfield.
- The background water quality of all constituents of concern (COC) in the overlying and underlying aquifers in the ISR wellfields.



## Where is the ground water quality collected before operation of an ISR wellfield?

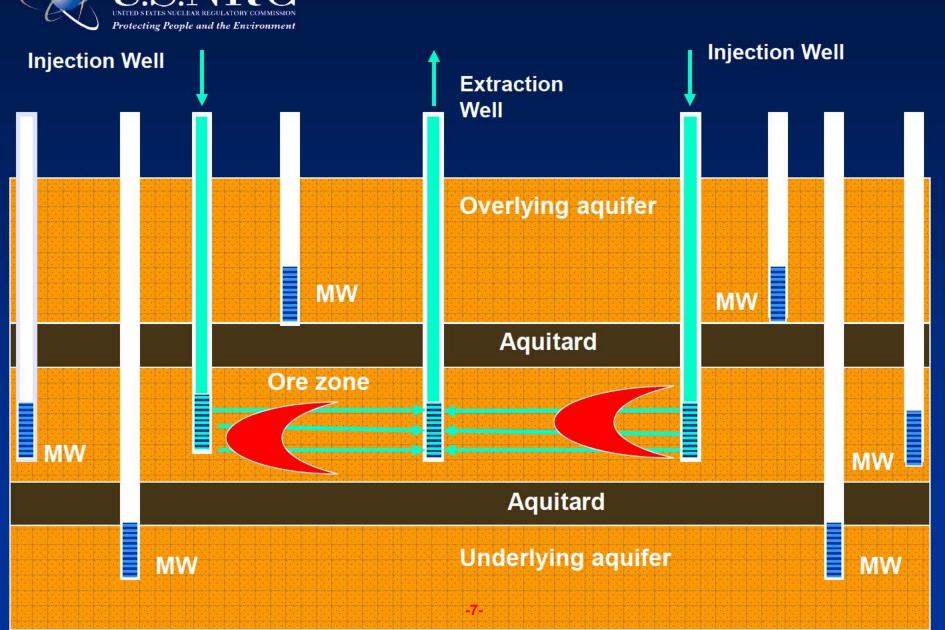


**Example of ISR Wellfield** 





## ISR Extraction, Injection and Overlying, Underlying and Perimeter Monitoring Wells





## How many samples are collected to assess the background ground water quality in an ISR wellfield?

- Production Ore Zone Aquifer (s) 4 samples/well, at least 2 weeks apart
- Perimeter Monitoring Ring Wells- 4 samples/well, at least 2 weeks apart
- Overlying Aquifer(s) 4 samples/well, at least 2 weeks apart
- Underlying Aquifer(s) –4 samples/well, at least 2 weeks apart
- Example: For a forty acre ISR wellfield, the production ore zone aquifer would have 40 samples for each parameter (1 well/4 acres basis).



## What parameters are measured to establish the background ground water quality in an ISR wellfield?

Typically measure NUREG- 1569
Table 2.7.3-1 parameters in each sample, unless non-detect in first two samples

	ng Pre-operational Dat	y Indicators to be Determined ta Collection	
11	A. Trace and Minor El	lements	
Arsenic	Iron	Selenium	
Barium	Lead	Silver	
Boron	Manganese	Uranium	
Cadmium	Mercury	Vanadium	
Chromium	Molybdenum	Zinc	
Copper	Nickel	11 12	
Fluoride	Radium-226 <sup>a</sup>		
	B. Common Constit	uents	
Alkalinity	Chloride	Sodium	
Bicarbonate	Magnesium	Sulfate	
Calcium	Nitrate		
Carbonate	Potassium		
	C. Physical Indica	tors	
Specific Conductivity*		Total Dissolved Solids <sup>#</sup>	
pH*			
	D. Radiological Para	meters	
Gross Alpha†	Gross Beta		

<sup>\*</sup>Field and Laboratory determination.

<sup>#</sup>Laboratory only.

<sup>†</sup>Excluding radon, radium, and uranium.

in If site initial sampling indicates the presence of Th-232 then Ra-228 should be considered in the base line sampling or an atternative may be proposed.



#### II. Statistical Analysis of ISR Wellfield Water Quality



### How should the ISR wellfield water quality be analyzed?

- Apply appropriate statistics to ground water quality measurements
  - Graphical analysis of data distribution to assess if water quality parameter is from same population in a wellfield or different water zones ( different sample populations).
  - Graphical and other tests for same population and outlier determination
  - General statistics- mean, median, standard deviation, etc.
  - Goodness of Fit (GOF) tests to select appropriate probability distribution
  - Upper Tolerance Limits (UTLs) and upper percentiles
  - Upper Confidence Limits (UCLs) of the Mean
- Accepted statistical methods can be found in EPA-530-R-09-007, "Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities: Unified Guidance," March 2009.



## What software applications are useful for statistical analysis of ISR wellfield ground water quality?



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#### ProUCL 4.1.00

Statistical Software for Environmental Applications for Data Sets with and without Nondetect Observations

http://www.epa.gov/osp/hstl/tsc/software.htm

3

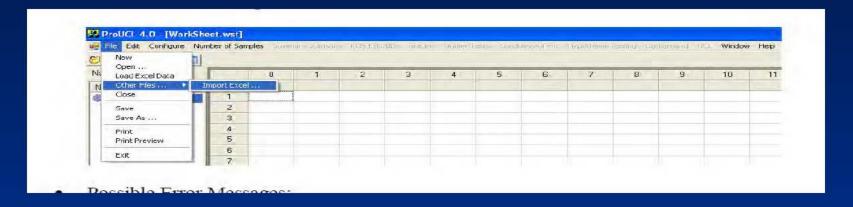
Free Download ProUCL 4.1 (http://www.epa.gov/osp/hstl/tsc/software.htm),

Free Webinar Training can be found at http://www.clu-in.org/conf/tio/ProUCLBasic\_030911/prez/1280x1024/ppframe.cfm?date=504&simul=1

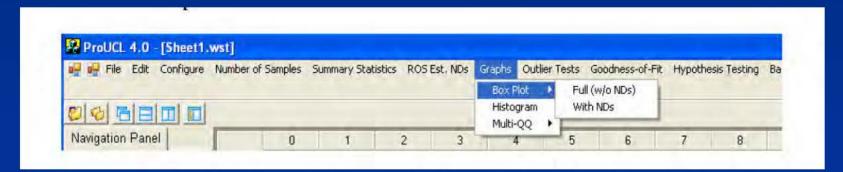


## ProUCL 4.1 Features User Friendly Spreadsheet Interface

#### Import Excel files (Excel 2003 \*.xls format) and export output files

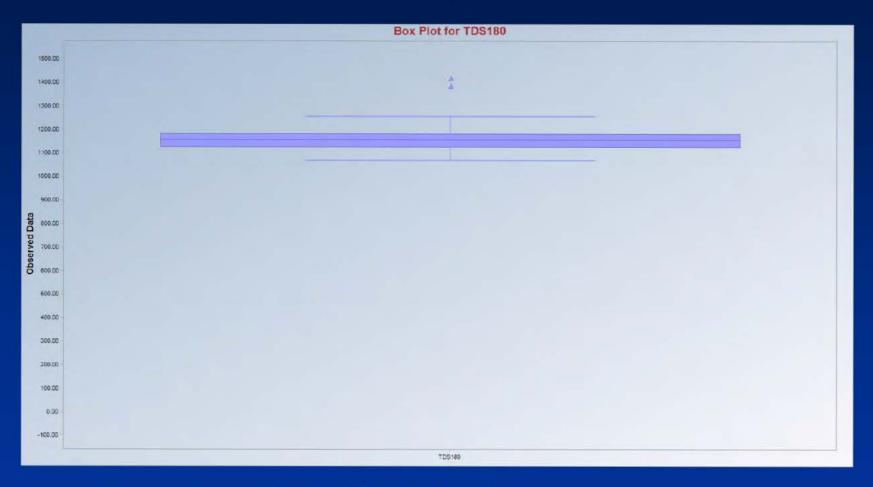


#### Spreadsheet pull-down menus to perform statistical analyses





# Pro UCL 4.1 Example ISR Wellfield Ore Zone TDS data set Box plot to demonstrate distribution, median and presence of outliers



- Apparent normal probability distribution
- Presence of two potential outliers
- TDS appears to come from same water zone (population)



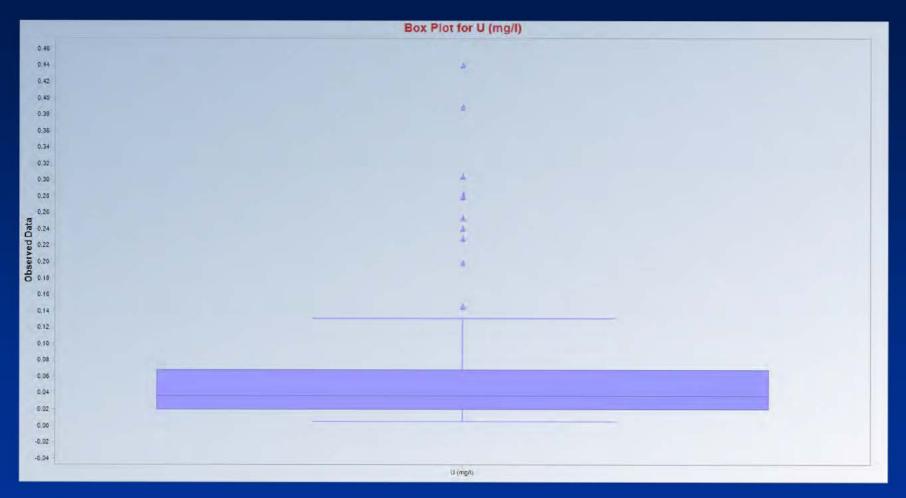
# ProUCL 4.1 Example ISR Wellfield Ore Zone TDS data set QQ plot to demonstrate probability distribution and presence of outliers



Conclusion - can use normal probability distribution to evaluate outliers, mean, standard deviation, etc. for ISR wellfield TDS



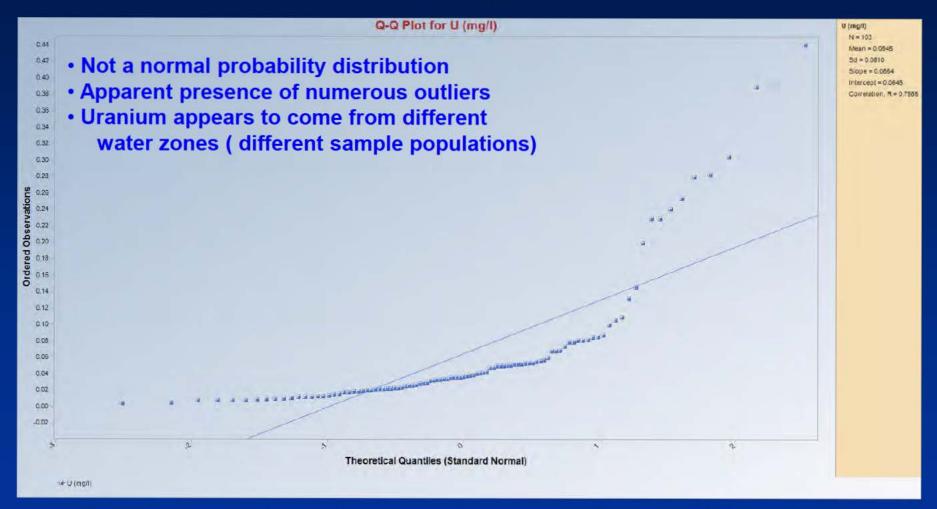
## ProUCL 4.1 Example ISR Wellfield Ore Zone Uranium data set Box Plot for uranium distribution and outliers



- Uranium data do not appear to follow a normal distribution data skewed
- Appear to be numerous potential outliers
- Appear to have different water zones (populations)



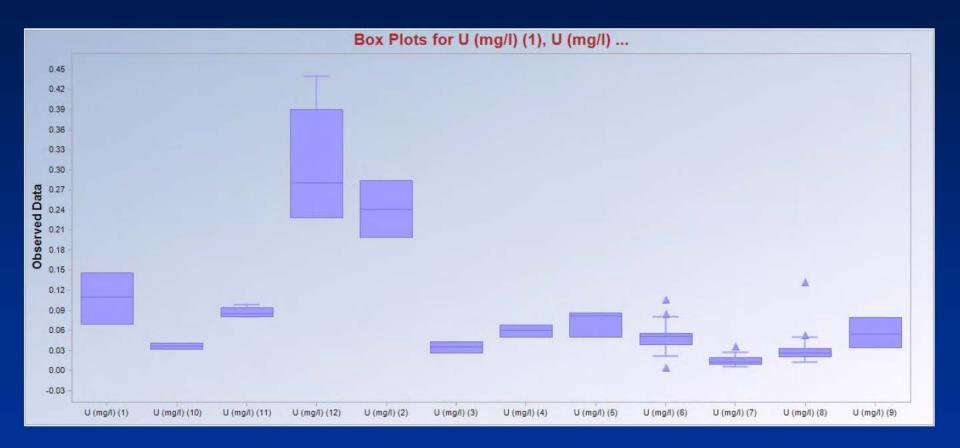
# ProUCL 4.1 Example ISR Wellfield Ore Zone Uranium data set QQ plot to demonstrate probability distribution and presence of outliers



Question – Does that make sense when compared to same TDS data for same ISR wellfield?



# ProUCL 4.1 Example ISR Wellfield Ore Zone Uranium data set Box Plot for uranium distribution and outliers for individual wells



Answer: Yes –would expect large heterogeneity in uranium- individual well data show ore zones are naturally heterogeneous in the wellfield Conclusion- should not use statistics which use normal probability distribution for uranium



ProUCL 4.1 Example
ISR Wellfield Ore Zone
Uranium data setGeneral background statistics
and probability distribution
for uranium

Provides min, max, mean, quartiles, median, standard deviation, etc.

Provides normal, lognormal and Gaussian distribution goodness of fit to choose appropriate probability distribution

Provides nonparametric statistics for skewed data and no underlying distribution

	eneral Background St	atistics fo	r Full Data	Sets			
User Selected Options							
	seine ore body.wst						
Full Precision OF							
Confidence Coefficient	95%						_
Coverage	90%						
Different or Future K Values	1						_
Number of Bootstrap Operations	2000						
U (mg/l)							
General Statistics					recommon and the second		
Total Number of Observations				Distinct Ob	servations		90
Tolerance Factor		1.52					
			_				
Raw Statistics				sformed Sta	tistics		
Minimum	1		Minimum				-5.426
Maximum			Maximum				-0.819
Second Largest			Second La				-0.942
First Quartile	1		First Quart	tile			-3.888
Median			Median				-3.297
Third Quartile	/		Third Qua	tíe			-2.685
Mean		0.0645					-3.25
Geometric Mean		0.0388	SD				0.978
SD /		0.081					
Coefficient of Variation		1.255					
Skewness		2.672					
Background Statistics							
Normal Distribution Test			The state of the s	d Distribution	on Test		/ - / - / - / - / - / - / - / - / - / -
Lilliefors Test Statistic				est Statistic			0.075
Lilliefors Critical Value		0.0872	The state of the s	ritical Value			0.0873
Data not Normal at 5% Significance	Leve	_	Data appe	ar Lognorma	at 5% Si	gnificance Level	
A No Distribution					Distribus		
Assuming Normal Distribution		0.400		Lognormal			0.172
95% UTL with 90% Co				with 90%	Coverage		0.172
			95% UP				0.136
90% Percentile (z)			90% Perce				0.136
95% Percentile (z)			95% Perce				0.194
99% Percentile (z)		0.253	99% Perce	entile (2)			0.378
Gamma Distribution Test			Data Dist	bution Test			
Committee of the Commit		4.000			1 -1 FW O	- Francis I mad	
k star				a Lognorma	a at 5% Si	ignificance Level	
Theta Star		0.059					
MLE of Mean		0.0645					
MLE of Standard Deviation		225.2					
nu star		225.2					
A.D Test Statistic		2.02	Mannagar	antein Ctatio	tion		
				netric Statis	ucs		0.143
5% A-D Critical Value			90% Perce 95% Perce				0.143
K-S Test Statistic			95% Perci				0.253
5% K-S Critical Value  Data not Gamma Distributed at 5%	Cionificance Level	0.091	99% Perci	SHURE			0.368
ata not Gamma Distributed at 5%	aignificance Level						
Assuming Gamma Distribution			Q504 LIT	with 90%	Coverses		0.241
90% Percentile		0.145				with 90% Coverage	0.241
90% Percentile 95% Percentile		0.145				90% Coverage	0.241
		0.187			OTL WITH	90% Coverage	0.241
99% Percentile		0.284					0.419
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95% WH Approx. Gamma UPL				eshold Limit	pased up	ONIGR	0.14
95% HW Approx. Gammel 94	th 000/ Causara -	0.182					
95% WH Approx. Gamma UTL wi		0.164					
95% HW Approx. Gamma UTL wit	n 90% Coverage	0.164					



## ProUCL 4.1 Example ISR Wellfield Uranium Data Set Upper Tolerance Limit (UTL)

Upper Tolerance Limit (UTL)-A UTL 95%-90% represents a 95% Upper Confidence Limit (UCL) of the value of the upper 90<sup>th</sup> percentile.

#### WHAT DOES IT MEAN?

This is upper limit of the interval which contains the measured value for which 90% of the samples will be less, 95% of the time ( WY Guideline 4 outlier "k test" which is based on normal distribution).

Lognormal uranium probability distribution gives UTL95%90% =0.172 mg/l

Non-parametric – no underlying distribution gives UTL95%90% =0.241 mg/l

Choice: You can say with 95% confidence that 90% of the measured values will be less than 0.241 or 0.172 mg/l.

	General Background S	Statistics fo	or Full Data Sets	
User Selected Options				
From File	Baseline ore body.wst			
Full Precision	OFF			
Confidence Coefficient	95%			
Charles and the Charles and th	77 (A)			
Coverage	90%			
Different or Future K Values	1			
Number of Bootstrap Operations	2000			
U (mg/l)				
General Statistics				
Total Number of Observations		103	Number of Distinct Observations	90
Tolerance Factor		1.52		- 00
Raw Statistics			Log-Transformed Statistics	
Minimum		0.0044	4 Minimum	-6.426
Maximum				-0.819
Second Largest				-0.942
First Quartile				-3.888
Median				The second second second
Median Third Quartile				-3.297
				-2.685
Mean		The Laboratory and the	5 Mean	-3.25
Geometric Mean		0.0388		0.978
SD		0.081	1	
Coefficient of Variation		1 255	5	
Skewness		2.672	2	
Background Statistics				
Normal Distribution Test			I Division T	
			Lognormal Distribution Test	
Lilliefors Test Statistic			5 Lilliefors Test Statistic	0.075
Lilliefors Critical Value		0.0873	3 Lilliefors Critical Value	0.0873
Data not Normal at 5% Significan	nce Level		Data appear Lognormal at 5% Significance Level	
Assuming Normal Distribution			Assuming Lognormal Distribution	
		0.400		0.470
95% UTL with 90% Coverage			8 95% UTL with 90% Coverage	0.172
95% UPL (t)			2 95% UPL (t)	0.198
90% Percentile (z)			8 90% Percentile (z)	0.136
95% Percentile (z)		0 198	8 95% Percentile (a)	0.194
99% Percentile (z)		0.253	3 good Scentile (2)	0.378
Gamma Distribution Test			Data Distribution Test	
k star		1 093	3 Data appear Lognormal at 5% Significance Level	
Theta St.		0.059		
WLE of Mean		0.0645		-
MLE of Standard Deviation		0.0645		
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A-D Test Statistic		3.023	Nonparametric Statistics	
5% A-D Critical Value			8 90% Percentile	0.143
K-S Test Statistic			1 95% Percentile	0.253
5% K-S Critical Value			1 99% Percentile	0.388
Data not Samue	W Significance Level	0.0011	1 00/01 Greenule	0.000
			OFFICIAL NA COOL C	
Assuming Gamma Distribution			95% LTL with 90% Coverage	0.241
90% Percentile		0.145	5 95% Percentile Bootstrap UTL with 90% Coverage	0.241
95% Percentile		0.187	7 95% BCA Bootstrap UTL with 90% Coverage	0.241
99% Percentile			4 95% UPL	0.275
			95% Chebyshev UPL	0.419
95% WH Approx. Gamma UPL		0.191	Upper Threshold Limit Based upon IQR	0.14
95% HW Approx. Gan 204PL		0.182		0.14
		0.164		
95% WH Approx. Gamma UTL				
95% HW Approx. Gamma UTL	with 90% Coverage	0.164	1	



ProUCL 4.1 Example
ISR Wellfield Ore Zone Uranium Data Set
Upper Confidence Limit (UCL) of the Mean

Upper Confidence Limit (UCL) of the mean is the upper limit of the interval which contains the mean at some confidence level (e.g. 95%)

Normal Distribution Students t UCL95 of the mean =0.0777 mg/l (not appropriate)

Lognormal Distribution H-UCL95 of the mean = 0.0773 mg/l (not recommended in ProUCL)

> Non-parametric Chebyshev UCL of the mean = 0.0993 mg/l ( recommended for skewed datasets In ProUCL)

	General UCL Statistic	es for Full Da	ata Sets			
User Selected Options						
From File						
Full Precision						
Confidence Coefficient	95%					
Number of Bookstrap Operations	2000					
mg/l)						
		General St	2202			
Nu	mber of Valid Observations	103	Number of Distinct Observations 90	,		
Raw S	Ratistics		Log-transformed Statistics			
	Momun	0.0044	Minimum of Log Data -5.	425		
	Vacoun	0.441	Maximum of Log Data -0.	819		
	Mean	0.0645	Mean of log Data -3.	25		
	Geometric Mean	0.0388	SD of log Data 0:	978		
	Medan	0.037				
	SD	0.081				
	Std. Error of Mean	0.00798				
	Coefficient of Variation					
	Skewness					
	Jaciwiess.	EUL				
		Relevant UCL				
Normal Dis	Inhution Test	200000	Lognormal Distribution, Test			
	Lifiefors Tes Statistic		Liftefors Test Statistic 0			
	Liftefors Critical Value	0.0873	Littefore Critical Value 0.0	0873		
Data not Normal at	5% Significance Level		Data appear Legnormal at 5% Significance Leve	d		
Assuming No	mal Distribution		Assuming Lognormal Distribution			
	95% Student's t UCL	0.0777	95% H-UCL 0	0773		
	sted for Skewness)	0.0177	95% Chebyshev (MVUE) UCL 0			
	ted-CLT UCL (Chen-1995)	0.0700	97.5% Chebyshev (MVUE) UCL 0			
	fied t UCL (Johnson-1978)		99% Chebyshev (MVUE) UCL 0.			
30.4 Mod	med-t OCL (Johnson-1978)	0.0781	59% Chebyanev (NVOE) GCL V.	100		
Gamma Dia	tribution Test		Dela Distribution			
	k star (blas corrected)	1.093	Dat Appear Lognormal at 5% Significance Leve	el .		
	Trete S					
	or Mean	0.0645				
	ac of Standard Deviation	0.0617				
	nu star	225.2				
Anomylin	ate Chi Square Value (05)	191.5	Nonpassetric Statistics			
	isted Level of Sgrificance		95% CLT UCL 0	0776		
	Adjusted Chi Square Value		95% Jackkinfe UCL 0:			
	rajusted Cri Square Value	191	95% standard Bootstrap UCL 0			
4		0.000				
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	n-Daring 5% Ortical Value		95% Hall's Bootstrap UCL 0			
	prov-Smimov Tea Statistic		95% Percentile Bootstrap UCL 0			
	r-Smirnov 5% Cat	0.0911	95% BCA Bootstrap UCL 0			
Data not Gamma Distribut	ed at agrificance	Level	95% Chebyshev(Mean, Sd) UCL 0			
			97.5% Chebyshev(Mean, 5d) UCL 0	114		
wing Gar	mma Distribution		39% Chebyshev (Mean, Sd.) UCL 0	144		
Approximate Gamm	a UCL (Use when n >= 40)	0.0759				
95% Adjusted Gamr	na UCL (Use when n < 40)	0,076				
	ucc - u		FIL APPLICATION IN	6775		
Potential	UCL to Use		Use 95% H-UCL 0	0/13		
1,100,000			based UCLs for historical reasons only.			
	. computes and output	a H-statistic				
ProUCI			s of UCL95 as shown in examples in the Technical Go	uide.		
ProUCI H-statistic often results in It is t	unstable (both high an herefore recommended	d low) value I to avoid th	is of UCL95 as shown in examples in the Technical Go e use of H-statistic based 95% UCLs.			
ProUCI H-statistic often results in It is t	unstable (both high an herefore recommended	d low) value I to avoid th	s of UCL95 as shown in examples in the Technical Go			
ProUCI H-statistic often results in It is t of nonparametric methods	unstable (both high an herefore recommended are preferred to comp	nd low) value I to avoid the oute UCL95 f	s of UCL95 as shown in examples in the Technical Gr e use of H-statistic based 95% UCLs. or skewed data sets which do not follow a gamma dist	tributio		
ProUCI H-statistic often results in It is t a of nenparametric methods	unstable (both high an herefore recommended are proforred to comp he selection of a 95%.)	nd low) value d to avoid the outs UCL95 f	is of UCL95 as shown in examples in the Technical Go e use of H-statistic based 95% UCLs.	tributio		

General UCL Statistics for Full Data Sets



## ProUCL 4.1 Example ISR Wellfield Ore Zone Uranium Data Set Comparison of Mean, UCL, and UTL

General Rule: Sample Mean < UCL 95% of Mean < UTL 95%-90%

1. Normal Distribution for Uranium (not indicated by GOF test):

 $0.0645 \,\mathrm{mg/l} < 0.0777 \,\mathrm{mg/l} < 0.198 \,\mathrm{mg/l}$ 

2. Lognormal Distribution for Uranium (indicated by GOF test):

0.0388 mg/l < 0.0773 mg/l < 0.172 mg/l

3. Non Parametric - No Distribution for Uranium (recommended for skewed data sets):

0.037 (median) mg/l< 0.0993 mg/l < 0.241 mg/l

\* Question: Which is acceptable for GWPS?

\* Answer: NRC accepts GWPS which can be technically justified



### How is restoration ground water quality data collected and analyzed?

#### The licensee collects:

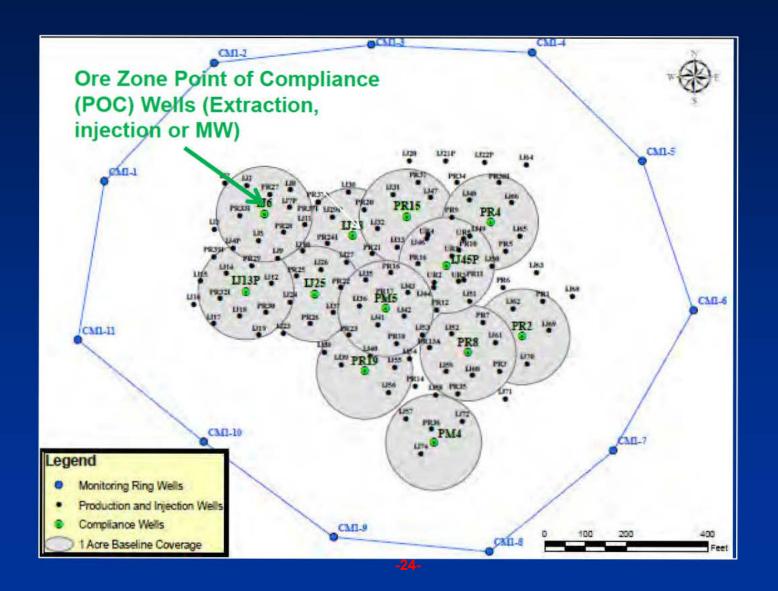
 Restoration ground water quality of all constituents of concern (COC) at all Point of Compliance Wells (POC) for at least four quarters

The licensee demonstrates and NRC reviews that:

- COC meets GWPS background GWPS previously approved.
- No Statistically Significant Increasing (SSI) trend for at least four consecutive quarters to demonstrate each COC GWPS will not be exceeded in POC wells after the restoration is deemed complete



### Where are the restoration water quality data collected in an ISR wellfield?





### How is restoration ground water quality data reviewed?

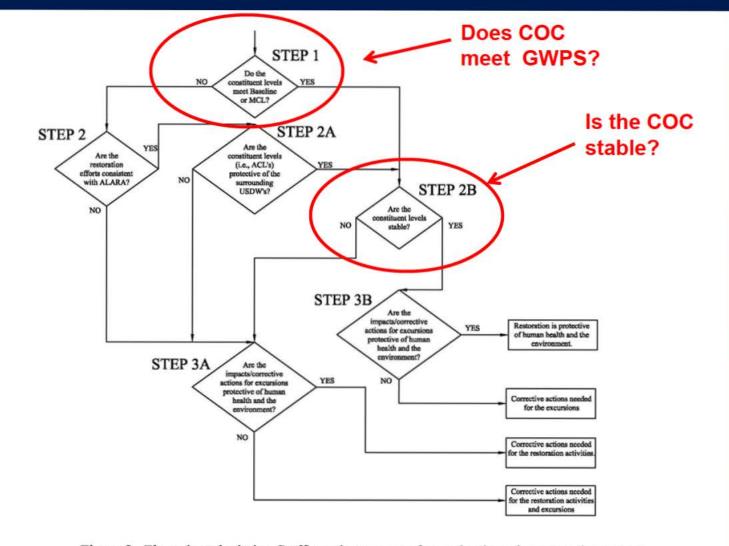
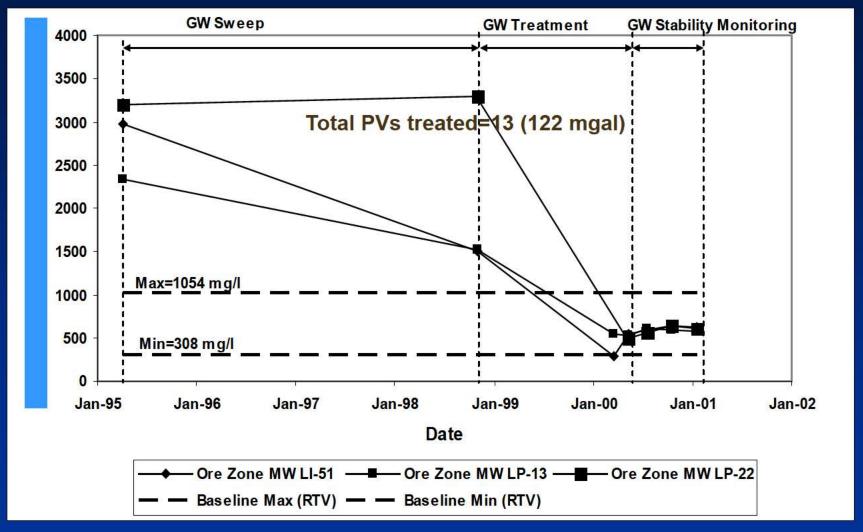


Figure 2. Flow chart depicting Staff's review process for evaluation of a restoration report.



### How is restoration stability at ISR Wellfield POCs demonstrated?



Show no statistically significant increase in constituent for at least four quarters of monitoring



## What are acceptable methods to determine the presence of a Statistically Significant Increase (SSI) trend in a COC?



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Pro UCL 4.1
Trend Analysis

### ProUCL 4.1.00

Trend Analysis: Linear Regression, Mann-Kendall Trend Test, and Theil-Sen Trend Line

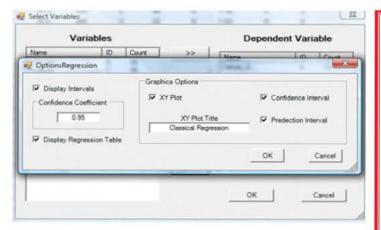
http://www.epa.gov/osp/hstl/tsc/software.htm



## ProUCL 4.1 Trend Analysis using Linear Regression Test

#### Linear Regression Line

Linear regression Line Test



Slope of line determines trend in data

Significant positive slope suggests upward trend

Significant negative slope suggests downward trend

Insignificant slope suggests no evidence of trend in data

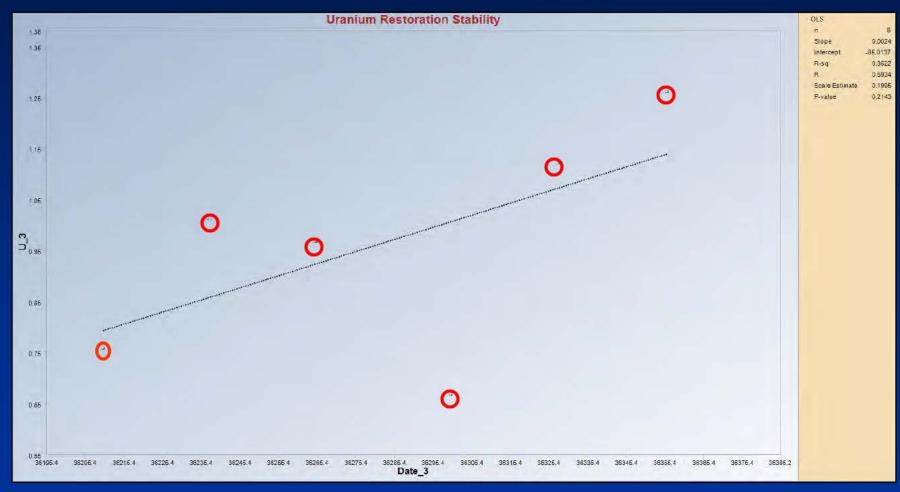
Significance is determined using p-value of slope test



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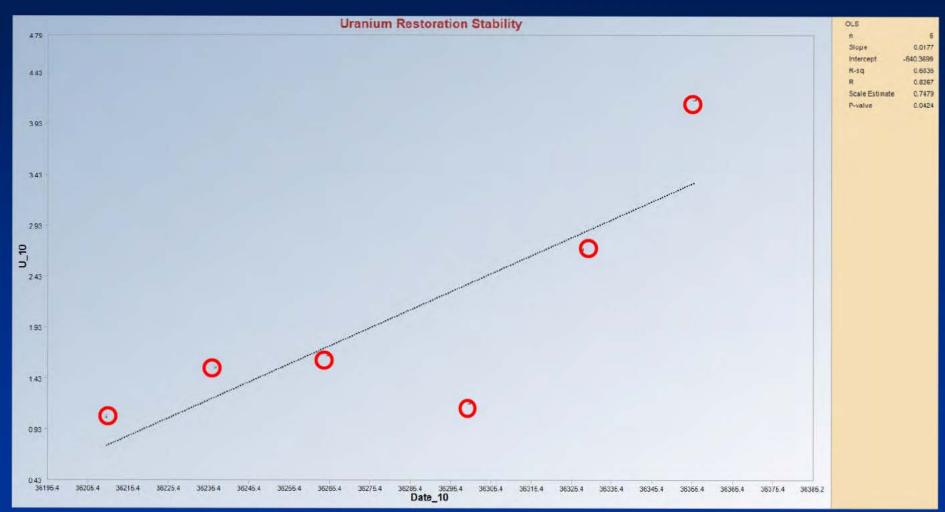
# ProUCL 4.1 Example ISR Wellfield Uranium Restoration Stability Data Trend Analysis No Statistically Significant Increase



Slope is not significantly different than zero (p=0.214)



# ProUCL 4.1 Example ISR Wellfield Uranium Restoration Data Stability Trend Analysis Statistically Significant Increase





# III. Public Access: Excel Spreadsheets for ISR Wellfield Background and Restoration Ground Water Quality



## Public Access Excel Spreadsheets for ISR Wellfield Background and Restoration Ground Water Quality

#### Issue:

Perception by public and others that ISR wellfield ground water quality data has not been measured or is not publicly available.

#### Facts:

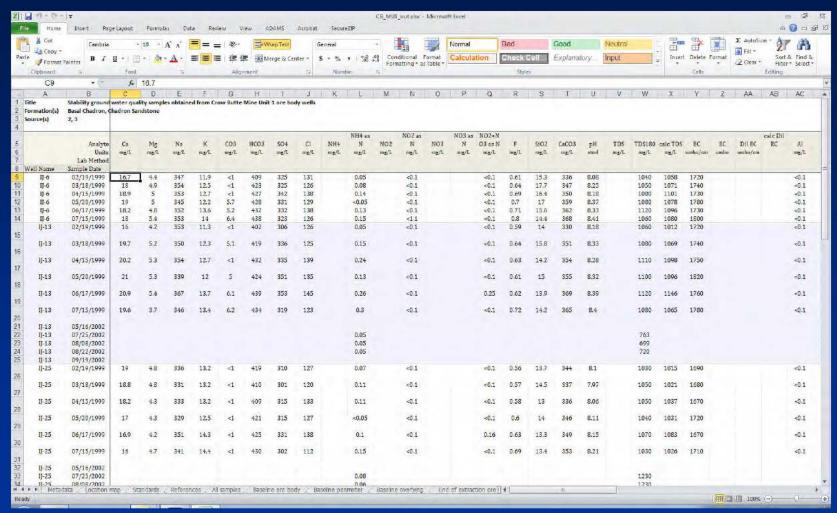
- Large amounts of ISR wellfield ground water quality data has been provided by the licensees to NRC.
- This reported ISR wellfield ground water quality is publicly available in documents in ADAMs.
- Public and others have found access to ISR wellfield ground water quality data difficult as it must be "mined" out of ADAMs documents.

#### NRC Objective: Improve Public Access

- Develop "user friendly" Excel standard format spreadsheets of publicly available ISR wellfield background and restoration water quality data from NRC licensed sites
- Post Excel spreadsheets to public NRC website to improve PUBLIC ACCESS to already publicly available data



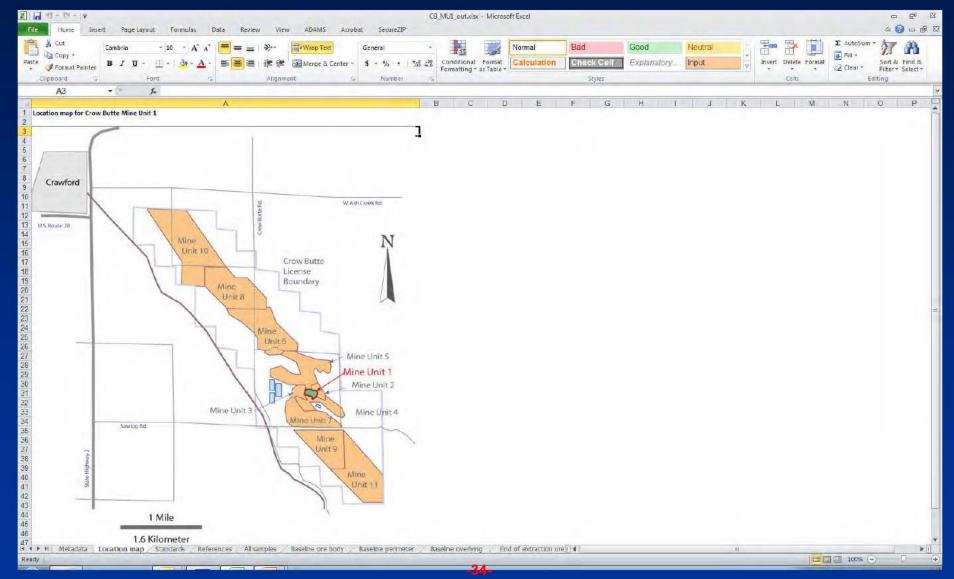
## Public Access Excel Spreadsheets ISR Wellfield Ground Water Quality Data Format



Spreadsheet Tabs for wellfield map, references, background, overlying, underlying, restoration and restoration water quality data, well completion information, etc.

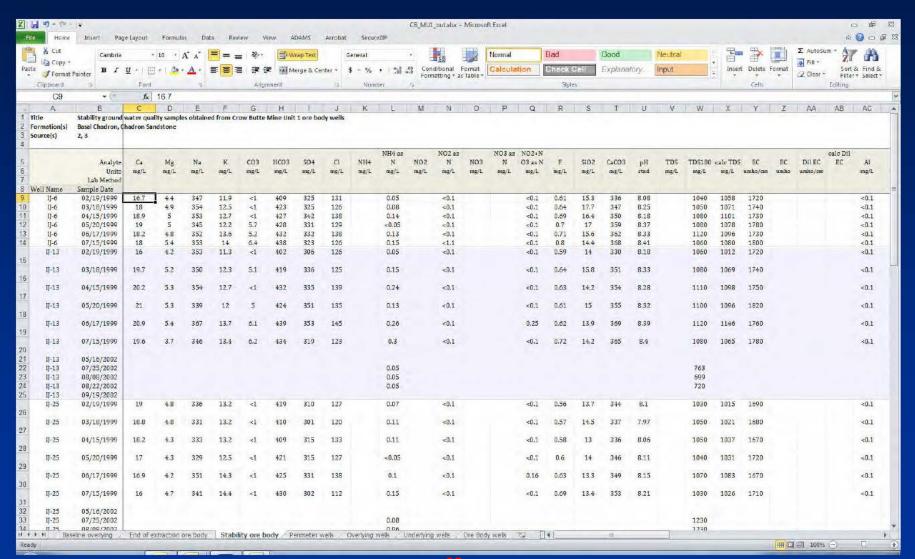


#### Public Access Excel Spreadsheets ISR Wellfield Map



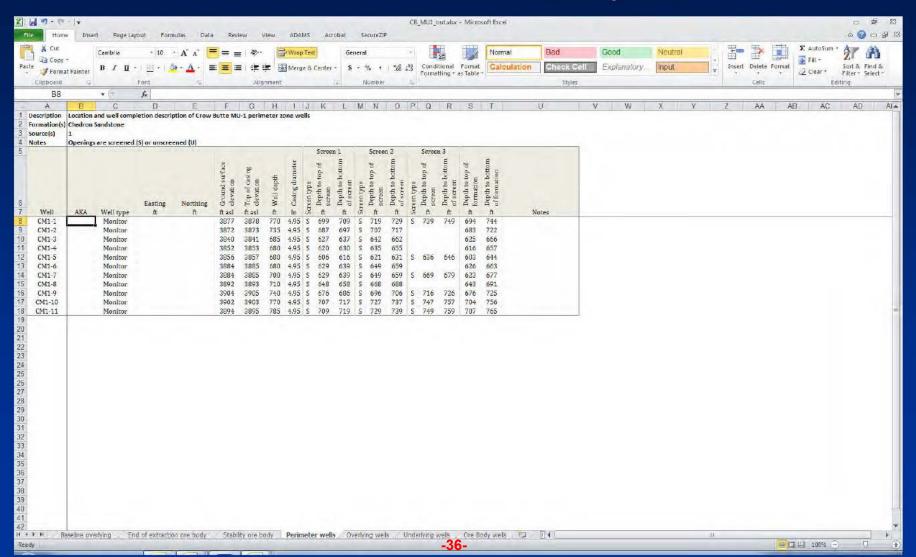


## Public Access Excel Spreadsheets ISR Wellfield Restoration Stability Water Quality



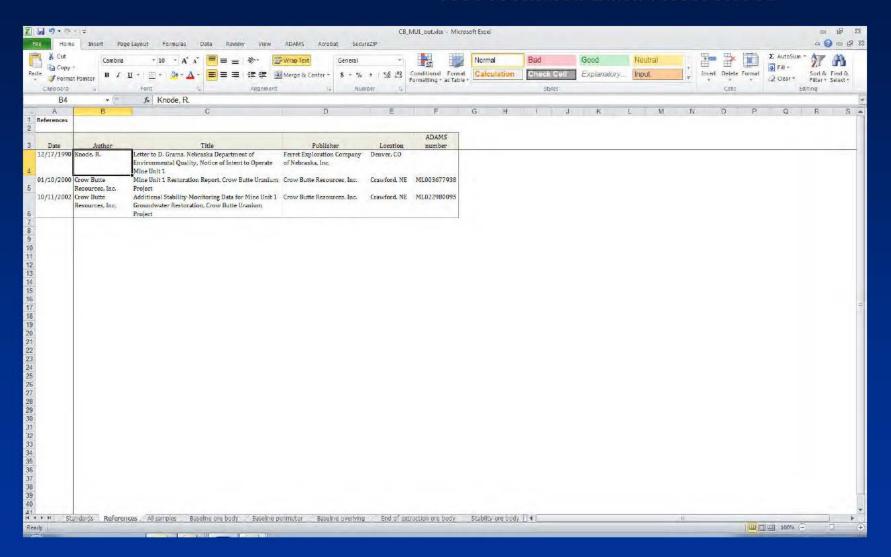


# Public Access Excel Spreadsheets ISR Wellfield Perimeter Monitoring Ring Well Descriptions





#### Public Access Excel Spreadsheets ISR Wellfield Data References





# Public Access Excel Spreadsheets ISR Wellfield Ground Water Quality Status

- 90% of publically available background and restoration ground water quality data for three NRC licensed ISR facilities has been entered into the spreadsheets
- Final data entry ongoing
- All data undergoing extensive quality assurance checks
- Anticipated date for posting of all spreadsheets to NRC public website -September 2013.



# Public Access Excel Spreadsheets ISR Wellfield Ground Water Quality Future Actions

Uranium Recovery Briefing to the Commission February 2013 NRC Staff Requirements Memorandum (SRM) (ML13067A365)

The staff should continue to collect groundwater monitoring well sampling data for in-situ recovery facilities. The staff should make these data publicly available and evaluate these data for insights on performance issues related to groundwater restoration and excursions events.

- Background and restoration stability water quality data will continue to be added to Excel spreadsheets for existing and new licensees.
- Excursion water quality data will be added to Excel spreadsheets for all existing and new licensees.
- All ISR water quality in the spreadsheets will be posted on the NRC public web site for improved public access.
- Staff will evaluate the data for insights on performance issues with respect to meeting GWPS and protecting ground water at ISR wellfields



# Conclusions ISR Wellfield Ground Water Quality Data Collection, Statistical Analysis and Public Access

### NRC Primary Regulatory Objective: Protect the public health, safety and the environment

- Collect adequate ISR wellfield background water quality data
- Use appropriate statistics (e.g. ProUCL4.1) to establish GWPS
- Collect adequate ISR restoration water quality data
- Use appropriate statistics (e.g. ProUCL4.1) to demonstrate restoration meets GWPS
- Use appropriate statistics (e.g. ProUCL4.1) to demonstrate restoration stability

Public Access- ISR wellfield background, restoration and excursion ground water quality provided to NRC by licensees will be posted to NRC public website in Excel spreadsheets