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Conestoga-Rovers and Associates Report: Evaluation of Hydrogeological Parameters in Support of Zion Restoration Project

Revision 5

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Evaluation of Hydrological Parameters in Support of Dose Modeling for the Zion Restoration Project

Zion Restoration Project Zion, Illinois

Revision 5

Prepared for: ZionSolutions

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Section 1.0 Introduction

Conestoga-Rovers & Associates (CRA) was retained by ZionSolutions, LLC (ZionSolutions) for hydrogeology consulting services related to the Zion Restoration Project at the former Zion Nuclear Power Station in Zion, Lake County, Illinois (Site). This report provides an evaluation of several components of the Conceptual Site Model (CSM) and preliminary estimates of hydrogeological parameters. The parameters are considered accurate but may change as new information becomes available. These parameters are used in radionuclide release, transport, and dose modeling activities performed by ZionSolutions.

Section 2.0 Development of Conceptual Site Model Components for Existing Conditions

This section provides an evaluation of specific components of the CSM applicable to current Site conditions, decommissioning activities, and post-decommissioning use of the Site.

2.1. An Evaluation of the Transport of Groundwater to Lake Michigan

Groundwater at the Site generally flows from areas west of the Zion Station Protected Area (PA) eastward towards Lake Michigan (Lake) within the unconfined upper sand unit which underlies the Site to a depth of approximately 33 feet below ground surface (bgs) (the Shallow Aquifer). There are variations in flow directions and rates due to the presence of subsurface structures (e.g., Reactor, Containment, Auxiliary, Turbine, and Crib House buildings).

The seepage velocity (also called the specific discharge) is the average velocity of groundwater flowing through a porous medium. The average seepage velocity of 137 feet per year (ft/y) is representative of groundwater due to the natural gradient. The seepage velocity of 0 to 104 ft/y is representative of the natural velocity attenuated by the subsurface structures (e.g., building basements and the sheet pile wall) and describes conditions ranging from stagnant (0 ft/y) west of the Crib House to 58 ft/y for groundwater flowing around the edge of the sheet pile wall (see Section 5.8). The estimated travel time of groundwater from the PA to Lake Michigan is on the order of less than 1 year to over 2 years.

The volume of groundwater flowing through the Shallow Aquifer from the PA into Lake Michigan (groundwater flux) can be approximated by the following calculation:

- The saturated thickness = 21.5 ft
- The length of the area of interest = 830 ft (north to south)
- Cross section area is (21.5 ft)×(830 ft) = 1.78E+04 ft²
- Porosity = 0.353
- Saturated pore portion of the cross sectional area = (1.78E+04 ft²)×(0.353) = 6.30E+03 ft²

- Groundwater flux into the Lake using the low end groundwater velocity (assuming structures and basements remain in place) = (6.30E+03 ft²)×(104 ft/y) = 6.58E+05 ft³/y × 7.48 gal/ft³ = 4.92E+06 gal/y
- Groundwater flux into the Lake using the high end groundwater velocity (assuming structures and basements are removed) = (6.30E+03 ft²) × (137 ft/y) = (8.60E+05 ft³/y) × (7.48 gal/ft³) = 6.43E+06 gal/y

2.2. Estimation of the Effects of Dilution on Contaminants Entering Lake Michigan via Groundwater

The total volume of water in Lake Michigan is estimated to be 1,180 cubic miles or about 1.3E+15 gallons (1). The stream flow entering the Lake is approximately 7.92 cubic miles per year (8.72E+12 gallons per year), and the discharge to Lake Huron is approximately 11.8 cubic miles per year (1.30E+13 gallons per year) (2). The average residence time (the time between entry and discharge/evaporation) for water in the Lake is 99 years (1), which is equivalent to an exchange of 3.6E+10 gallons per day. Also, the Lake waters undergo an annual inversion which mixes the water as part of the natural lake processes (3).

Although estimating the dilution requires release-specific information, the general scale of dilution can be illustrated using dilution factors calculated by the mixing of hypothetical Site contaminants in groundwater flux with the surface water volume of Lake Michigan. Two dilution estimation methods are evaluated below. The complete mixing approach is suitable for estimating long term mixing and dilution over a period of many years. The shoreline mixing approach is suitable for estimating the potential impact at the shoreline adjacent to the Site.

2.2.1. Complete Mixing Approach

A release of dissolved contaminants to the Lake would be diluted by mixing with the existing volume of Lake water due to the annual inversion of the Lake and currents. This dilution factor can be estimated for the volume of groundwater flux from the Site as explained above and its mixing each year with Lake Michigan surface water. A conservative dilution factor can be estimated by mixing the Site groundwater flux with the total influx of water to Lake Michigan. Using the lower range of groundwater velocity, this yields a dilution factor of:

$$\frac{\text{Total Influx to Lake Michigan}\left(\frac{gal}{y}\right)}{\text{Site Groundwater Flux}\left(\frac{gal}{y}\right)} = \frac{1.31E + 13\left(\frac{gal}{y}\right)}{4.92E + 06\left(\frac{gal}{y}\right)} = 2.67E + 06$$

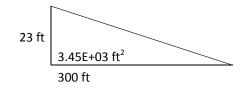
The higher range of groundwater velocity yields a dilution factor of:

$$\frac{\text{Total Influx to Lake Michigan}\left(\frac{gal}{y}\right)}{\text{Site Groundwater Flux}\left(\frac{gal}{y}\right)} = \frac{1.31E + 13\left(\frac{gal}{y}\right)}{6.43E + 06\left(\frac{gal}{y}\right)} = 2.04E + 06$$

This estimates the dilution of a (hypothetical) continuous source of groundwater contamination entering Lake Michigan from the Site.

2.2.2. Shoreline Mixing Approach

The dilution factor was also calculated for the near-shore area of the Lake adjacent to the Site, where recreational swimmers and ecological receptors may be affected. The length along the shore of the area of concern is assumed to be 830 ft, based upon the approximate length of the PA along the shore line. The distance into Lake Michigan of the area of concern was assumed to be 100 yards (300 ft), based upon the distance a recreational swimmer is likely swim into the Lake. The depth of water at 100 yards is 23 ft, based upon the depth of water at B-81, a preconstruction borehole location. The cross-sectional area is 300 ft \times 23 ft / 2 = 3,450 ft² (assuming the lakebed slope is linear).



Surface currents in Lake Michigan are driven by winds and are ephemeral in direction and velocity. Subsurface currents consistent with longshore drift have been described in an Illinois State Water Survey (ISWS) study at Wilmette, Illinois (approximately 30 miles south of Zion) (4). The following median current velocities were described:

- 1.137 cm/s at a station 2.1 meters (m) deep and 107 m from shore
- 1.518 cm/s at a station 5.2 m deep and 213 m from shore (4 p. 17)

Based on the average current velocity of the near shore station (1.137 cm/s or 1.18E+06 ft/y) times the cross-sectional area (3.45E+03 ft²) yields a total volume of water of 4.06E+09 ft³/y (or 3.04E+10 gal/y).

The volume of groundwater discharging into the Lake from the Site was estimated to be 6.43+06 gal/y, assuming the basements and sheet pile wall are removed and 4.92E+06 gal/y assuming the basements and sheet pile wall remain in place (see Section 2.1). The dilution factor for each of these scenarios was calculated to be:

$$\frac{3.04E + 10 \frac{gal}{y}}{6.43E + 06 \frac{gal}{y}} = 4.72E + 03 \qquad \text{(subsurface structures removed)}$$
$$\frac{3.04E + 10 \frac{gal}{y}}{4.92E + 06 \frac{gal}{y}} = 6.18E + 03 \qquad \text{(subsurface structures remaining)}$$

These dilution factors are very conservative and unlikely to represent the true dilution of groundwater into the Lake, since these values do not account for water exiting the near-shore area further into the Lake.

2.3. An Evaluation of the Effectiveness of the Silty Clay Aquitard at the Base of the Shallow Aquifer

The silty clay unit (found under the Shallow Aquifer) (also referred to herein as the Silty Clay Aquitard) is approximately 30 ft thick and overlies the lower sand unit. The silty clay unit is laterally extensive at the Site and the underlying lower sand unit has exhibited a significant confining pressure (artesian pressure at boring B-43) and a strong upward vertical gradient (5). To the extent that groundwater flow can occur through the silty clay unit, the groundwater in the lower sand unit would move upward into the upper sand unit (Shallow Aquifer).

The building foundations for the Containment Buildings, Auxiliary Building, Turbine Building, and Crib House are set in or near the upper portion of the silty clay unit. However, the silty clay unit extends approximately 15 ft below the deepest structural feature at the Site.

The silty clay unit's low permeability and upward vertical gradient limits the potential for the migration of contaminants or radionuclides to the underlying lower sand unit or the regional bedrock aquifers.

Section 3.0 Development of CSM Components for Decommissioning Activities

Several components of the CSM require evaluation or refinement prior to their incorporation into risk assessment and dose modeling for the Site. An evaluation of these components may guide the selection of decommissioning technologies for their use in the CSM.

3.1. Basement Fill Alternatives

The CSM anticipates that the basements will generally remain in place and be filled with 'clean' concrete (no detectable residual radioactivity from Site operations) originating from the demolition of aboveground buildings and structures or other fill material. The scenarios described below are hypothetical.

3.1.1. Riprap Scenario

During the demolition of aboveground concrete structures, large pieces of riprap will be produced (e.g., using an excavator with a pneumatic hammer attachment) and staged at the Site. The basements would then be backfilled with large clean concrete pieces (protruding rebar must be removed), and sand would be used to fill the voids during backfilling.

This fill material would act as a framework gravel, with incomplete infilling of void spaces by sand. The resulting porosity is expected to be high, ranging from 25-40% for riprap-sand mixtures and 40 to 45% for uniform riprap. Groundwater can readily flow through this material. The area of fresh concrete surfaces would be minimized, which would reduce the pH impact due to calcium leaching.

3.1.2. 3-inch Clean Concrete Scenario

Under this scenario, during the demolition of aboveground concrete structures, large pieces of riprap will be produced and staged at the Site. A mobile concrete crusher would be used to reduce the clean concrete to $3'' \times 3''$ pieces. The basements would then be backfilled with $3'' \times 3''$ crushed concrete. Pea gravel may be used to top off partially demolished basement rooms and other enclosed spaces.

This fill material would act as an open framework gravel. The resulting porosity is expected to be high, ranging from 25-40% for 3"×3" concrete-sand mixtures and 40 to 50% for uniform 3"×3" concrete. Groundwater can readily flow through this material. The area of fresh concrete surfaces would be maximized, which would generally increase the pH impact due to calcium leaching.

3.1.3. Sand Scenario

Under this scenario, sand backfill is used as an alternative fill material and may be selected based on the sorption characteristics of the radionuclides of concern. The resulting porosity is expected to be typical of sand, ranging from 25-40%. Groundwater can readily flow through this material. The use of sand backfill would minimize the pH impacts from fresh concrete surfaces. The sand backfill would also minimize the potential for settling over time. However, sand cannot be compacted if it is placed in a room below grade that is not open at the top due to load bearing or similar considerations for the remaining structure.

3.1.4. Riprap and Flowable Fill Scenario

Under this scenario, during demolition of above ground concrete structures, large pieces of riprap are produced and staged at the Site. The basements would then be backfilled with large clean concrete pieces (protruding rebar must be removed), and flowable fill (grout fill) would be used to fill the voids during backfilling.

The flowable fill may be composed of a blend of cement, fly ash, sand and gravel, slag, and/or water. The flowable fill will solidify upon standing. Water in contact with the flowable fill is expected to exhibit an elevated pH due to the chemical makeup of the concrete and fly ash. However, the building foundations and low permeability of the flowable fill will limit the amount of groundwater that can be exposed to the fill.

3.1.5. Surface Cover

The surface cover for the filled building basements is currently proposed to consist of approximately 3 feet of sand/soil.

3.2. Final Disposition of the Sheet Pile Wall

The current decommissioning scenario allows the sheet pile wall to remain intact at the end of the project. It is assumed that the sheet pile wall will not be cut off below grade or damaged during the decommissioning, but will continue in its current use for shoreline erosion control.

3.3. An Evaluation of the Risk of Compromising the Silty Clay Aquitard at the Base of the Shallow Aquifer During Decommissioning Activities

The current decommissioning plan for the Site will allow the deeper building foundations to remain in place. Excavation activities for foundation removal will be limited to slab-on-grade and shallow building foundations.

As previously stated in Section 2.3, the silty clay unit is approximately 30 ft thick and extends at least 15 ft below the deepest building foundations at the Site. Since there will not be any excavation to a depth that the silty clay unit could be affected, the unit is expected to remain intact during and after the decommissioning process. The silty clay unit will continue to act as a laterally extensive aquitard which limits the potential for the vertical movement of groundwater at the Site.

Section 4.0 Development of Post-Decommissioning CSM Components

Several components of the post-decommissioning CSM require evaluation or refinement prior to their incorporation into risk assessment and dose modeling for the Site. An evaluation of these components may guide the selection of decommissioning technologies or their use in the CSM.

4.1. An Evaluation of Groundwater Flow Through and Around Subsurface Structures Left in Place

If the basements and sheet wall are perforated but left in place, the impediment on groundwater flow will be reduced but not completely eliminated. There will be some restrictions and retardation of the overall flow of groundwater from areas to the west toward Lake Michigan. However, the primary flow of groundwater will continue to be toward the Lake. Some vertical migration of groundwater will occur within the Shallow Aquifer as groundwater flows through and around these subsurface structures.

If the buildings and sheet pile wall are left intact (not perforated for flow), then a localized stagnation of groundwater around these barriers will occur since groundwater is prevented from flowing through these structures toward the Lake.

4.1.1. Deterioration of the Sheet Pile Wall Over Time

During construction of the Site in 1968, a cofferdam (also called a sheet pile wall) was built along the Lake side of the Crib House to allow the first sections of circulating water pipe and their easements to be installed dry. The cofferdam was constructed of sheet piling installed parallel to the Lake with sections (called walers) extending about 415 feet north and south of the Crib House. There is no indication that protective coatings or cathodic protection were used. The sheet piling was left in place at the completion of the construction for shore erosion protection. "Should the sheet piling deteriorate there can be no deleterious effect on the Crib House or any other safety-related structures. The Crib House and safety-related structures are self-contained and do not depend on the sheeting for protection" (6 pp. 2.4-14).

The sheet pile wall was constructed of U.S. Steel MZ27 sheet piling (new standard designation PZ27) (7). MZ27 sheet piling is 0.375-inches [9.5 millimeters (mm)] thick.

Corrosion rates for sheet pile walls have been estimated based on available literature.

Table 4.1 presents the estimated loss of thickness due to corrosion, and Table 4.2 presents the loss of thickness due to pitting.

Table 4.1Loss of Thickness in the Sheet Pile Wall Due to Corrosion (mm)					
	Years from Installation				
Installation	5	25	50	75	100
Undisturbed natural soils (sand, silt, clay, schist, etc.) (8)	0.00	0.30	0.60	0.90	1.20
Common fresh water (river, ship canal, etc.) in the zone of	0.15	0.55	0.90	1.15	1.40
high attack (water line) (8)					

Table 4.1Loss of Thickness in the Sheet Pile Wall Due to Corrosion (mm)					
	Years from Installation				
Installation	5	25	50	75	100
Duluth-Superior Harbor accelerated fresh water corrosion	0.50	2.50	5.00	7.50	10.00
(maximum of 0-3 meters) (9)					
Duluth-Superior Harbor accelerated fresh water corrosion	0.20	1.00	2.00	3.00	4.00
(greater than 3 meters) (9)					

Pitting, or localized corrosion, will occur at a more rapid rate (2 to 3 times that of the average corrosion rate) (10).

Table 4.2Loss of Thickness in the Sheet Pile Wall Due	to Pittin	g (mm)			
	Years from Installation				
Installation	5	25	50	75	100
Undisturbed natural soils (sand, silt, clay, schist, etc.) ⁺	0	0.9	1.8	2.7	3.6
Common fresh water (river, ship canal, etc.) in the zone of high attack (water line) †	0.45	1.65	2.7	3.45	4.2
Duluth-Superior Harbor accelerated fresh water corrosion (maximum of 0-3 meters) ‡	1.5	7.5	15	22.5	30
Duluth-Superior Harbor accelerated fresh water corrosion (greater than 3 meters) ‡	0.6	3	6	9	12
Notes: 1. Loss due to pitting is based on 3 times the corrosion ra ⁺ ArcelorMittal 2008 (8 p. 3/6 to 3/7) ⁺ Clark et al. 2009 (9)	ite.				

The sheet pile wall is approximately 45 years old (2013-1968=45). Based on its age and the expected corrosion rates, perforations may be present in the upper 10 ft of the saturated zone if accelerated corrosion rates apply. If normal corrosion rates apply, the upper 10 ft is expected to remain intact for >100 years. The remaining depth, although structurally weakened by corrosion, is generally expected to remain intact for 30 to >100 years. The sheet pile wall will act as a significant barrier to groundwater flow while intact and is expected to slowly pit and corrode over a period of decades or centuries, with failure in the upper 10 feet significantly preceding the remainder of the wall. Once the pitting penetrates the wall, its effectiveness as a hydraulic barrier will decline.

4.2. An Assessment of the Feasibility of a Future Site Occupant Installing a Water Well at the Site

Three potential scenarios exist for the installation and use of a residential water well installed into the Shallow Aquifer at the Site:

- 1) A well installed within the basement of a former building filled with clean concrete pieces
- 2) A well installed between the former buildings and the Lake
- 3) A well installed closer to the Lake

Under the current decommissioning scenario, the basements would be filled with clean concrete pieces. As a practical matter, the drilling of a well through clean concrete pieces is much more difficult and expensive than drilling a well in any other nearby location. In the case where the basements are filled with a grouted mixture, drilling a well is even more difficult. The yield of such a well would be limited to the rate at which water could enter the building through perforations and may not be sufficient to provide for residential use. Additionally, the water in the former basements would exhibit undesirable taste and odor characteristics due to the elevated pH that is anticipated due to the presence of clean concrete pieces.

A hypothetical well installed between the major buildings and the sheet pile wall could easily be installed within the Shallow Aquifer. This well would be in an area of low groundwater flow or even stagnation. Its yield would be somewhat restricted by the approximately 15 to 20 ft of saturated thickness of this aquifer. However, such a well is anticipated to produce sufficient water for a single residential use scenario.

A hypothetical well installed downgradient of the buildings (near the Lake) could be installed and used easily. It would likely yield much more water as the recharge to the well would include Lake water. The quality of water of such a well (located near the Lake) may not make it appropriate for drinking water purposes without treatment due to potential biological contamination.

4.2.1. Potential Capture Zone and Drawdown

The potential capture zone and drawdown were calculated based upon the scenario of a hypothetical water well being installed within the PA, between the buildings and the sheet pile wall. The calculations were performed assuming two conditions: the sheet pile wall remains in place (gradient = 0.0039) and, the sheet pile wall is removed (gradient = 0.0051).

The steady state Todd equation (11) was used for the capture zone calculation. It can be described for an unconfined aquifer as follows:

$$T_{width} = 2Y_{max} = \frac{2QL}{K(h_1^2 - h_2^2)}$$

Where,

 T_{width} is the capture width at an infinite upgradient distance (ft) Y_{max} is one half of the total capture width (ft)

Q is the pumping rate (ft^3/day) h_1 is the measured groundwater elevation above the base of the aquifer upgradient of the pumping well (ft) h_2 is the measured groundwater elevation above the base of the aquifer downgradient of the pumping well (ft)

L is the distance over the two water level measuring locations

K is the hydraulic conductivity for the aquifer (ft/day)

The steady-state Theim equation for an unconfined aquifer (12) was used to determine the drawdown. It can be described as follows:

$$K = \frac{Q}{\pi (b_2^2 - b_1^2)} \ln \left(\frac{r_2}{r_1}\right)$$

Where,

K is the hydraulic conductivity for the aquifer (ft/day)

Q is the pumping rate (ft^3/day)

 b_1 is the saturated thickness at distance r_1 from the pumping well (ft)

b₂ is the saturated thickness at distance r₂ from the pumping well (ft)

Table 4.3 Hypothetical Water Well Parameters						
Parameter	Symbol	Units	Value	Source		
Aquifer thickness	b	ft	21.53	Section 5.1.1		
Hydraulic conductivity	К	cm/s	5 x 10 ⁻³	Section 5.6		
Hydraulic gradient	i	ft/ft	0.0039, 0.0051	Section 5.7		
Pumping Rate	Q	m³/yr	250	RESRAD Default		

The following parameters were utilized to calculate the capture zone and drawdown:

Based upon the parameters listed in Table 4.3 (above), the expected capture zone and drawdown for a well located within the Shallow Aquifer with varying pumping rates are presented in Table 4.4 below. These calculations were performed based upon a gradient of 0.0039 ft/ft to simulate the sheet pile wall in place and a gradient of 0.0051 to simulate the sheet pile wall being removed or degraded over time. The estimated width of the capture zones at the center of pumping are calculated to be 6.77 ft (based upon a gradient with the sheet pile wall in place) and 5.18 ft (based upon a gradient with sheet pile wall being removed or degraded over time). The drawdown as based upon both of these gradients is nominal under this pumping rate. These are the capture zones which can be generally expected in a well located within the Shallow Aquifer when pumped at the average rate of 250 m³/yr [0.13 gallons per minute (gpm)], under their respective conditions.

The average pumping rate within the Shallow Aquifer was determined to be 10.9 gpm. This rate is based upon ISGS water well logs for wells located within 2 miles of the Site with pumping rates provided. The maximum pumping rate with the sheet pile wall in place or removed is expected to be approximately 20 gpm. However, the capture zone and drawdown are expected to be greater with the sheet pile wall in place. This is due to the restricted gradient in place by the sheet pile wall. These calculations do not take into account the close proximity to Lake Michigan and the likely recharge provided by the Lake. Therefore, the actual maximum pumping rate with the sheet pile wall removed is likely to be greater than the estimated rate. The capture zone and drawdown under these scenarios will be further developed with modeling in order to account for complexities outside the reach of these calculations.

Table 4.4Hypothetical Water Well Capture Zone and Drawdown							
		i=0.00	39	i=0.0051			
Pumping Rate		(sheet pile wa	(sheet pile wall in place) (sheet pile wall remove		e wall removed)		
		Capture Zone	Drawdown	Capture Zone	Drawdown		
(gpm)	(m³/yr)	(ft)	(ft)	(ft)	(ft)		
0.13	250	10.2	0.04	8.04	0.03		
0.5	995	40.4	0.20	30.9	0.19		
1	1,991	80.9	0.46	61.9	0.44		
5	9,955	404	3.08	309	2.96		
10	19,910	809	7.20	618	6.92		
15	29,865	1,213	12.4	928	11.9		
20	39,820	1,618	19.3	1,237	18.4		
25	49,774	*	*	*	*		
Notes: *Water well cannot support this pumping rate.							

4.3. Rise in Lake Michigan Surface Water Elevation

Since the Shallow Aquifer and the Lake are directly connected, it is possible for a zone of stagnation to occur if the Lake water level rises above the groundwater level. The pressure from the Lake water entering the groundwater would prevent the groundwater from reaching the Lake.

If the water level in Lake Michigan were to rise, it could cause a reversal of flow westward. The Lake has historical, measured fluctuations of over 6 ft. Even under these extreme conditions, a groundwater flow reversal would be localized and found only near the Lake, as the regional flow would still flow eastward towards Lake Michigan. A zone of stagnation would occur where the two groundwater flow fronts meet. In order for this to occur, the Lake water level would have to be higher than the groundwater level.

Monthly average water levels in Lake Michigan/Huron have been recorded beginning in 1918. Between 1918 and 2013, the average water level in Lake Michigan was 578.8 ft above mean sea level (amsl). The lowest monthly average Lake level was 576.02 ft amsl in January 2013. The highest monthly average Lake level was 582.35 ft amsl in October 1986 (13) (14) (15).

4.4. De Minimus Scenarios

There are several scenarios that are unlikely and have been determined to have minimal consequence. These scenarios are discussed in the following sections.

4.4.1. Basement Overflow Scenario

The basement overflow scenario assumes that the basement walls and floors are left intact during the decommissioning (or alternatively that any building penetrations have been sealed over time). The basements would then fill up over time due to the infiltration of precipitation and eventually overflow.¹ Basement overflow rates were calculated based upon basement depths, precipitation rate, and evaporation rate. These calculations determine how long it will take for the substructures to fill with water assuming substructures are left in place with the superstructure roof removed. This scenario also assumes that no cracks are present in the basement walls. The average annual precipitation rate, as detailed in Section 5.8 below, of 32.61 inches/y was utilized. These calculations for each substructure are presented in the table below. For the purpose of these calculations, 3 ft were subtracted from the building depths to account for the proposed removal of the upper 3 ft of the substructure.

¹ An additional consideration for the scenario where the walls are left intact is the buoyancy of the structure, which must be taken into consideration prior to the removal of the above ground structures and other building loads. The buoyancy of subsurface structures is not evaluated in this report.

Table 4.5 Substructure Dimensions							
		Top of	Adjusted	Adjusted			
		Basement	depth of	depth of			
	Finish Grade	Floor	basement ⁺	basement+	Area	Volume	
	(ft amsl)	(ft amsl)	(ft)	(in)	(ft ²)	(ft ³)	
Unit 1 Containment	591	568	20	240	2.00E+04	4.01E+05	
Unit 2 Containment	591	568	20	240	2.00E+04	4.01E+05	
Fuel Handling Building	591	576	12	144	9.18E+03	1.10E+05	
Auxiliary Building	591	542	46	552	2.90E+04	1.34E+06	
Turbine Building	591	560	28	336	1.21E+05	3.38E+06	
Lake Crib House	591	539	49	588	3.14E+04	1.54E+06	
Wastewater Treatment							
Facility	591	578	10	120	9.45E+03	9.45E+04	
Notes:				•	•	•	

Three feet were subtracted from the building depths to account for the upper 3 feet of basement that will be removed

This scenario was run under four different assumptions: 1) Assuming no evaporation, 2) Assuming a pan evaporation rate, 3) Assuming a lake evaporation rate, and 4) Assuming evapotranspiration.

This scenario only accounts for rainwater falling directly into the substructure and does not account for runoff into the substructure. Further, this scenario was also run assuming each of the following: the basements are open holes with no backfill, the basements are backfilled with sand, and the basements are backfilled with riprap. It was assumed that the sand backfill will have a porosity of 0.35, based upon the September 2013 investigation. The riprap is assumed to have a porosity of 0.45 (16). The sand and riprap backfill were accounted for by multiplying the number of years to fill the open hole by their respective porosities. The backfill to be used on Site will likely be a combination of sand and riprap. These calculations provide a likely range of the years it will take for the unperforated basements to fill with water.

The following basic calculation steps were utilized to determine the fill rates:

t

Step 1: Annual Precipitation Rate – Evaporation Rate = Annual Water Accumulation
Step 2: (Basement Depth)/(Annual Water Accumulation) = Years to Fill Basement
Step 3: (Years to Fill Basement) x (Porosity) = Years to Fill Basement Considering Backfill Material

4.4.1.1. Assumption 1 - No Evaporation

The first scenario assumes that the substructures fill based upon the average precipitation rate and does not take into account any loss of water. This scenario is highly unlikely, since evaporation of water will occur. Based upon these parameters, the expected fill time of each substructure is presented below.

verage Precipitation	Time to Over	Ton the Found					
	pitation Time to Over-Top the Foundation (Years)						
Structure Rate (inches/y) No Fill Sand Fill† Riprap Fi							
32.61	7.36	2.58	3.31				
32.61	7.36	2.58	3.31				
32.61	4.42	1.55	1.99				
32.61	16.93	5.92	7.62				
32.61	10.30	3.61	4.64				
32.61	18.03	6.31	8.11				
32.61	3.68	1.29	1.66				
-	32.61 32.61 32.61 32.61 32.61 32.61 32.61	32.61 7.36 32.61 7.36 32.61 7.36 32.61 4.42 32.61 16.93 32.61 10.30 32.61 18.03	32.61 7.36 2.58 32.61 7.36 2.58 32.61 4.42 1.55 32.61 16.93 5.92 32.61 10.30 3.61 32.61 18.03 6.31				

Notes:

⁺ This calculation assumes the basements are filled with sand. The porosity of sand is assumed to be 0.35, based upon the September 2013 investigation.

[‡] This calculation assumes the basements are filled with riprap. The porosity of riprap is assumed to be 0.45, based upon guidelines from the U.S. Department of the Interior (16).

4.4.1.2. Assumption 2 - Pan Evaporation

Pan evaporation rates are determined from direct loss of water from a pan over time. The pan evaporation rate utilized in this analysis was determined from an Illinois pan evaporation isoline map presented in an ISWS lake evaporation study (17). The ISWS study (17) utilized pan evaporation data from 17 stations in and near Illinois collected between May through October over a 16 year period to derive a state-wide map. This method is limited in that it only accounts for the months of May through October. Evaporation during the winter months is likely to be less.

This scenario assumes that the substructures fill with water based upon the average precipitation rate and accounts for the loss of water due to evaporation. An evaporation rate of 28 inches/y was assumed based upon "Pan Evaporation" studies performed in Illinois (17). Based upon these parameters, the expected fill time of each substructure is presented below. Actual fill times may be less, since this does not account for evaporation between November and April.

	Pan Evaporation		Time to Over-Top the Foundation		
	rate	Water Gain	(Years)		
Structure	(inches/y)	(inches/y)	No Fill	Sand Fill†	Riprap Fill‡
Unit 1 Containment	28	4.61	52.06	18.22	23.43
Unit 2 Containment	28	4.61	52.06	18.22	23.43
Fuel Handling Building	28	4.61	31.24	10.93	14.06
Auxiliary Building	28	4.61	119.74	41.91	53.88
Turbine Building	28	4.61	72.89	25.51	32.80
Lake Crib House	28	4.61	127.55	44.64	57.40
Wastewater Treatment Facility	28	4.61	26.03	9.11	11.71

Notes:

⁺ This calculation assumes the basements are filled with sand. The porosity of sand is assumed to be 0.35, based upon the September 2013 investigation.

[‡] This calculation assumes the basements are filled with riprap. The porosity of riprap is assumed to be 0.45, based upon guidelines from the U.S. Department of the Interior (16).

4.4.1.3. Assumption 3 - Lake Evaporation

The third scenario assumes that the substructures fill with water based upon the average precipitation rate and also accounts for the loss of water due to evaporation. An evaporation rate of 31 in/y was assumed based upon studies performed in Illinois (17). This evaporation rate is an annual average over a 52 year period between 1911 and 1962. Lake evaporation rates were computed in the ISWS study by utilizing air temperature, dew point temperature, wind movement, and solar radiation. Based upon the Lake evaporation rate near the Zion area, the expected fill time of each substructure is presented below.

Table 4.8Time to Over Top the Foundation Assuming Lake Evaporation					
	Lake Evaporation	Water Gain	Time to Over-Top the Foundation (Years)		
Structure	rate (inches/y)	(inches/y)	No Fill	Sand Fill†	Riprap Fill‡
Unit 1 Containment	31	1.61	149.07	52.17	67.08
Unit 2 Containment	31	1.61	149.07	52.17	67.08
Fuel Handling Building	31	1.61	89.44	31.30	40.25
Auxiliary Building	31	1.61	342.86	120.00	154.29
Turbine Building	31	1.61	208.70	73.04	93.91
Lake Crib House	31	1.61	365.22	127.83	164.35
Wastewater Treatment	31	1.61	74.53	26.09	33.54
Facility					
N					

Notes:

⁺ This calculation assumes the basements are filled with sand. The porosity of sand is assumed to be 0.35, based upon the September 2013 investigation.

[‡] This calculation assumes the basements are filled with riprap. The porosity of riprap is assumed to be 0.45, based upon guidelines from the U.S. Department of the Interior (16).

4.4.1.4. Assumption 4 – Evapotranspiration

Evapotranspiration is the evaporation of water from plants, soil, and other surfaces to the atmosphere. This scenario most accurately depicts the filled basement state. The mean annual potential evapotranspiration near the Zion area is expected to be 28 inches/y, based upon a potential evapotranspiration isoline map of Illinois, as presented in an ISWS study (17). Based upon the evapotranspiration rate near the Zion area, the expected fill time of each substructure is presented below.

Table 4.9Time to Over Top the Foundation Assuming Evapotranspiration Rates					
	Evapotranspiration	Water Gain	Time to Over-Top the Foundation (Years)		
Structure	Rate (inches/y)	(inches/y)	No Fill	Sand Fill†	Riprap Fill‡
Unit 1 Containment	28	4.61	52.06	18.22	23.43
Unit 2 Containment	28	4.61	52.06	18.22	23.43
Fuel Handling Building	28	4.61	31.24	10.93	14.06
Auxiliary Building	28	4.61	119.74	41.91	53.88
Turbine Building	28	4.61	72.89	25.51	32.80
Lake Crib House	28	4.61	127.55	44.64	57.40
Wastewater Treatment	28	4.61	26.03	9.11	11.71
Facility					
Notes:					

⁺ This calculation assumes the basements are filled with sand. The porosity of sand is assumed to be 0.35, based upon the September 2013 investigation.

‡ This calculation assumes the basements are filled with riprap. The porosity of riprap is assumed to be 0.45, based upon guidelines from the U.S. Department of the Interior (16).

4.4.2. Hydrogeologic Feasibility of a Pond for Fish Consumption

To receive water containing radionuclides released from the basement fill CSM, a pond would have to be constructed downgradient from the major building basements. Two simple types of surface water impoundments or ponds could hypothetically be constructed at the Site in the area between the former buildings and the Lake. The first type of pond construction would rely on groundwater to seep into the pond and to provide a base level (freeboard) of surface water. The second type of pond would be constructed such that the pond is lined or has some barrier to hold and contain surface water recharge and precipitation infiltration.

Neither of these pond types is likely to be constructed by a single resident due to engineering and cost issues. In addition, if a resident wished to use surface water, Lake Michigan is nearby.

The first type of pond would have to be excavated to a depth of over 10 to 15 ft in order to intercept the groundwater table. This type of construction would require engineered side walls, shoring, and other methods to keep the pond from collapsing (as it is constructed into sands).

The second type of pond, which relies upon surface recharge, would require a liner or bottom of some sort. Without a liner or bottom in the pond, any of the surface water captured in the pond would easily recharge through the Shallow Aquifer and seep to the groundwater table. As such, an engineered liner would have to be constructed.

Given the engineering design and costs to construct either of these pond types, this exposure pathway is highly unlikely.

Section 5.0 Dose Modeling Parameters

This section provides input parameters to be used for dose pathway calculations. These include selected physical and hydraulic property parameters that may be input to the DUST-MS model where the floor of a major building such as a Containment Building includes surface contamination. This contaminated material is instantaneously released into a band of water and the radionuclides are transported in this band through the building into and through the down gradient natural system to receptor locations. The DUST-MS model uses selected parameter values to calculate the water concentration outputs which are then input into the RESRAD or RESRAD OFFSITE code for calculation of the pathway dose. Site specific parameters are based on field studies conducted in 2012 and 2013, which are described in the reports provided in Appendix A through D.

5.1. Thickness of Contaminated Zone

For the RESRAD Family of Codes, "Thickness of the Contaminated Zone" is defined as "the distance between the shallowest and the deepest depth of contamination" (18 pp. 4-25). Thickness of the contaminated zone is an important physical parameter in the RESRAD and RESRAD-OFFSITE codes. This parameter is evaluated for two scenarios: contaminated zone that extends from the water table to the bottom of the saturated zone and a contaminated zone that extends from ground surface to the bottom of the saturated zone.

5.1.1. Scenario 1 – Shallow Aquifer

This potential scenario assumes that contamination extends from the water table to the top of the Silty Clay Aquitard at the base of the Shallow Aquifer. This thickness can be estimated using the boring logs for the wells situated immediately downgradient from the central plant area, as provided in Table 5.1 below:

	March 13, 2013			
	Water Level	Aquitard Surface	Thickness	Thickness
Boring Location	(ft amsl)	(ft amsl)†	(ft)	(meters)
MW-ZN-01S	578.95	562.18	16.8	5.1
MW-ZN-02S	579.43	555.21	24.2	7.4
MW-ZN-03S	579.72	556.54	23.2	7.1
MW-ZN-04S	579.47	557.51	22.0	6.7
Average			21.5	6.6

[†]The Shallow Aquifer includes stratigraphic units containing gravel, sand, and silt with sand.

5.1.2. Scenario 2 – Vadose Zone and Shallow Aquifer

This potential scenario assumes that contamination extends from the ground surface to the top of the Silty Clay Aquitard at the base of the Shallow Aquifer. This thickness can be estimated using the boring logs for the wells situated immediately downgradient from the central plant area, as provided in Table 5.2 below:

Table 5.2Thickness of the Vadose Zone and Shallow Aquifer					
	Ground Surface	Aquitard Surface	Thickness	Thickness	
Boring	(ft amsl)	(ft amsl) <i>†</i>	(ft)	(meters)	
MW-ZN-01S	591.43	562.18	29.3	8.9	
MW-ZN-02S	591.21	555.21	36.0	11.0	
MW-ZN-03S	591.54	556.54	35.0	10.7	
MW-ZN-04S	591.01	557.51	33.5	10.2	
Average			33.4	10.2	
Notes:					
+ The Shallow Aquif	er includes stratigraphic units cont	aining gravel, sand, and s	ilt with sand.		

Note: The subsurface material near the Site buildings is composed of native fill material; as such, the material may be variable across the area. The MW-ZN-03S boring log indicates that a 1 foot thick silty clay till layer is present at 11 feet bgs, followed by a silt and sand layer and a silt with sand layer to a depth of 35 feet bgs. Due to the nature of the source of the soil in the area and the comparable aquifer thicknesses at nearby boring locations, the thickness of the shallow aquifer at MW-ZN-03 is estimated to be 35 feet.

5.2. Contaminated/Saturated Zone Field Capacity

Field capacity is defined as the ratio of the volume of water retained in the soil sample (after all downward gravity drainage has ceased) to the total volume of the sample (19). Laboratory measurements of field capacity typically measure the volumetric water content of a soil sample under a negative pressure of 1/10 or 1/3 bar (20) (21). A volumetric water content greater than the field capacity is not available for plant use because it drains away quickly. The wilting point is the maximum pressure that a plant can exert to overcome the tension of the water adhering to the soil. The wilting point corresponds to a negative pressure of 15 bars. The water content of a soil between the field capacity (1/10 to 1/3 bar) and the wilting point (15 bar) is called the available water content. Literature values of field capacity for different soil textures are provided in the table below:

Soil Texture	Field Capacity at 1/3 bar in percent by volume†	Soil Texture	Field Capacity at 1/3 bar in percent by volume†
Sand	1.8 - 16.4	Sandy Clay Loam	18.6 - 32.4
Loamy sand	6.0 - 19.0	Clay Loam	25.0 - 38.6
Sandy loam	12.6 - 28.8	Silty Clay Loam	30.4 - 42.8
Loam	19.5-34.5	Sandy Clay	24.5 - 43.3
Silt Loam	25.8-40.2	Silty Clay	33.2 - 44.2
Silt		Clay	32.6 - 46.6

Laboratory measurements of field capacity and water retention were determined using a compression/decompression chamber method. This method places a saturated soil sample onto a porous ceramic plate which is then placed in a closed chamber. A known amount of pressure is then established in the chamber, which forces water out of the soil sample and into the porous plate and out of the chamber. The water holding capacity of the soil is determined by the amount of water held in the soil sample versus the dry weight of the sample. The amount of pressure applied during each test ranged from 0.1 bar to 15 bar. Soil water retention curves were developed using the water content at different pressure points. The soil water retention curves are included in Appendix D. The laboratory estimates of field capacity at 1/10 bar and 1/3 bar are shown in the table below:

Table 5.4Field Capacity				
		Field Cap	acity (%)	
Soil Boring Identifier	Sample Identifier	0.1 bar	1/3 bar	
GT2-MW-01S	GT2-MW-01S-5	10.4	4.7	
GT2-MW-01S	GT2-MW-01S-20	3.6	1.2	
GT2-MW-01S	GT2-MW-01S-28	6.5	2.5	
GT2-MW-02S	GT2-MW-02S-5	10.3	4.1	

Table 5.4 Field Capacity				
Field Capacity (%)				
Soil Boring Identifier	Sample Identifier	0.1 bar	1/3 bar	
GT2-MW-02S	GT2-MW-02S-26	8.9	3.8	
GT2-MW-06S	GT2-MW-06S-5	3.9	1.8	
GT2-MW-06S	GT2-MW-06S-20	2.9	1.0	
Arithmetic mean		6.64	2.73	

Typical field capacity values for sand range from 1.8% to 16.4% by volume at 1/3 bar (21). The arithmetic mean of the laboratory values for field capacity at 1/3 bar is 2.73% by volume, which is within the range of the literature values.

The Data Collection Handbook to Support Modeling Impacts of Radioactive Material in Soil (Yu et al., 1993) defines field capacity as the ratio of the volume of water retained in the soil sample (after all downward gravity drainage has ceased) to the total volume of the sample (19). To meet this narrative definition, Romano & Santini (2002) recommend using the volumetric water content at 0.1 bar as the estimate of field capacity for coarse-grained soils (e.g., sands) (20). The average field capacity of the soil samples at 0.1 bar is 6.64% by volume. This is consistent with field capacity values identified by the International Atomic Energy Agency (IAEA) for sand ranging from 6% for coarse sand to 10% for fine sand (22 p. 4).

5.3. Density of Contaminated/Saturated Zone

The proposed model scenario is based on the transport of contaminants in groundwater released from the major building basements in the down-gradient direction toward Lake Michigan. Under this scenario, the contaminants would be transported through both the disturbed sand unit to the west of the sheet pile wall and the native sand unit to the east of the sheet pile wall. Since the transport will encompass both disturbed and undisturbed sands, the average value of laboratory measurements (of saturated zone samples) is used to estimate the bulk density of native sands and fill mixture in the saturated zone². These values are provided in Table 5.5 below:

Table 5.5 Dry Soil Bulk Density				
Soil Boring Identifier	Sample Identifier	Bulk Density (pcf)	BulkDensity (gm/cm³)	
GT2-MW-01S	GT2-MW-01S-5	112.6	1.80	
GT2-MW-01S	GT2-MW-01S-20	118.0	1.89	

² Soil samples collected in the earlier investigation on December 12, 2012 were also submitted for laboratory analysis of dry bulk density. However, a review of the laboratory report resulted in the rejection of the analytical results for dry bulk density due to inconsistency with grain size distribution. The results were comparable to a dense-graded aggregate such as MDOT 21AA rather than the fine to medium sand at the Site. As a result, the dry soil bulk density values from the December 12, 2012 investigation have been excluded from the evaluation.

Table 5.5 Dry Soil	Bulk Density		
Soil Boring Identifier	Sample Identifier	Bulk Density (pcf)	BulkDensity (gm/cm³)
GT2-MW-01S	GT2-MW-01S-28	115.3	1.85
GT2-MW-02S	GT2-MW-02S-5	118.4	1.90
GT2-MW-02S	GT2-MW-02S-26	112.5	1.80
GT2-MW-06S	GT2-MW-06S-5	102.2	1.64
Arithmetic mean		113.2	1.81

5.4. Contaminated/Saturated Zone Total Porosity

The proposed model scenario is based on the transport of contaminants in groundwater released from the major building basements in the down-gradient direction toward Lake Michigan. Under this scenario, the contaminants would be transported through both the disturbed sand unit to the west of the sheet pile wall and the native sand unit to the east of the sheet pile wall. Since the transport will encompass both disturbed and undisturbed sands, the average value of laboratory measurements (from saturated zone samples) is used to estimate the total porosity, as provided in Table 5.6 below:

Table 5.6 Soil Porosity		
Boring Identifier	Sample Identifier	Porosity (% by volume)
GT2-MW-01S	GT2-MW-01S-5	33.2
GT2-MW-01S	GT2-MW-01S-20	29.7
GT2-MW-01S	GT2-MW-01S-28	31.6
GT2-MW-02S	GT2-MW-02S-5	33.4
GT2-MW-02S	GT2-MW-02S-26	36.9
GT2-MW-06S	GT2-MW-06S-5	39.3
GT2-MW-06S	GT2-MW-06S-20	42.7
Arithmetic mean		35.3

5.5. Contaminated/Saturated Zone Effective Porosity

The term "effective porosity" can refer to the retention of water against gravity drainage (also called specific retention) or the portion of porosity that is interconnected and allows the flow of groundwater. The Data Collection Handbook to Support Modeling Impacts of Radioactive Material in Soil (19) defines effective porosity as the total porosity minus the field capacity. This is consistent with the specific retention-based definition of effective porosity as described by Bear (1972):

"In the case of a phreatic aquifer, water is actually drained out of the pore space, and air is substituted as the water table drops. However, not all water contained in the pore space is removed by gravity drainage (say, toward a depression in the ground water table caused by a pumping well). A certain amount of water is held in place against gravity in the interstices between grains under molecular forces and surface tension. Hence, the storativity of a phreatic aquifer is less than the porosity by a factor called specific retention (the ratio of water retained against gravity to the bulk volume of a soil sample). Reflecting this phenomenon, the storativity of a phreatic aquifer is often referred to as specific yield. The term effective porosity is also often used in this context. However, one should be careful not to confuse this usage of the term with that effective porosity referring to flow through a porous medium" (23 p. 8).

Since the effective porosity is used to calculate transport time in groundwater (24 pp. E-19), smaller values are considered more conservative (i.e., they reduce transport time). Total porosity and field capacities determined during the September 30, 2013 investigation were utilized to calculate the effective porosity (specific yield), as described in Table 5.7 below:

Table 5.7 Effe	Table 5.7 Effective Porosity (Specific Yield) Based on Field Capacity						
Boring Identifier	Sample Identifier	Porosity	Field Capacity at 0.1 bar (%)	Effective Porosity (%)			
GT2-MW-01S	GT2-MW-01S-5	33.2	10.4	22.8			
GT2-MW-01S	GT2-MW-01S-20	29.7	3.6	26.1			
GT2-MW-01S	GT2-MW-01S-28	31.6	6.5	25.1			
GT2-MW-02S	GT2-MW-02S-5	33.4	10.3	23.1			
GT2-MW-02S	GT2-MW-02S-26	36.9	8.9	28.0			
GT2-MW-06S	GT2-MW-06S-5	39.3	3.9	35.4			
GT2-MW-06S	GT2-MW-06S-20	42.7	2.9	39.8			
Arithmetic mean		35.3	6.6	28.6			

The average effective porosity value of 28.6% is appropriate to use for RESRAD models.

5.5.1. Effective Porosity with Respect to Flow through a Porous Medium

The second definition of the term "effective porosity" refers to the portion of porosity that is interconnected and allows the flow of groundwater. The average velocity of groundwater can be expressed as (23 pp. 121-122):

V = Q/nA = q/n

where: V is the average groundwater velocity (m/s)

Q is the volumetric flow rate (m^3/s)

q is the specific discharge (m/s)

n is the volumetric porosity

A is the cross sectional area (m²)

However, part of the fluid in the pore space is immobile due to adhesion between the solid surface and the molecules of the fluid or when the porous medium includes a large number of dead-end pores. In this case, the effective porosity with respect to flow through a porous medium is defined as:

 $V = q/\eta_e$

where: V is the average groundwater velocity (m/s) q is the specific discharge (m/s) η_e is the effective porosity (m³/ m³)

Literature values for effective porosity include $\eta_e = 0.85\eta$ for fine sand, and $\eta_e = 0.80\eta$ for coarse sand (25 p. 36). Since the average groundwater velocity is inversely proportional to the effective porosity, smaller values of effective porosity are conservative. Based on the average total porosity of 35% described above, a conservative estimate of the effective porosity with respect to flow through a porous medium is $35 \times 0.80 = 28\%$.

The effective porosity value of 28% is appropriate to use for the Disposal Unit Source Term (DUST) models.

5.6. Contaminated/Saturated Zone Hydraulic Conductivity

Soil samples were collected in December 2012 and September 2013 for hydraulic conductivity analysis using a flexible wall permeameter. The hydraulic conductivity results are shown in Table 5.8 below.

Boring		Hydraulic Conductivity		Saturated Zone Hydraulic Conductivity	
Location	Sample Identifier	(cm/s)	(m/y)	(cm/s)	(m/y)
GT MW 01s	S-121212-LP-01 (S-01)	5.10E-03	1.61E+03		
GT MW 01s	S-121212-LP-02 (S-02)	5.60E-03	1.77E+03	5.60E-03	1.77E+03
GT MW 01s	S-121212-LP-03 (S-03)	9.10E-03	2.87E+03	9.10E-03	2.87E+03
GT MW 02s	S-121212-LP-04 (S-04)	3.30E-03	1.04E+03		
GT MW 02s	S-121212-LP-05 (S-05)	2.40E-03	7.57E+02	2.40E-03	7.57E+02
GT2-MW-01S	GT2-MW-01S-5	5.36E-03	1.69E+03		
GT2-MW-01S	GT2-MW-01S-20	3.94E-03	1.24E+03	3.94E-03	1.24E+03
GT2-MW-01S	GT2-MW-01S-28	3.13E-02	9.88E+03	3.13E-02	9.88E+03
GT2-MW-02S	GT2-MW-02S-5	1.26E-03	3.98E+02		
GT2-MW-02S	GT2-MW-02S-26	1.96E-03	6.19E+02	1.96E-03	6.19E+02
GT2-MW-06S	GT2-MW-06S-5	1.04E-02	3.28E+03		
Geometric Mea	n	4.85E-03	1.53E+03	5.56E-03	1.75E+03

Single well response tests were performed on monitoring wells in September 2013. The single well response tests were performed by introducing an aluminum slug into each well and recording the water level in the well as it equilibrated with the water table. The results of the slug tests are provided in Table 5.9 below.

Table 5.9Hydraulic Conductivity Determined by Single Well Response Test					
			Saturated Zone Hydraulic Conductivity		
Well ID	Test Type	Analytical Method	(cm/s)	(m/y)	
MW-01S	Falling Head	Hvorslev	3.51E-02	1.11E+04	
MW-01S	Rising Head	Hvorslev	2.46E-02	7.77E+03	
MW-02S	Falling Head	Hvorslev	4.36E-03	1.37E+03	
MW-02S	Rising Head	Hvorslev	4.70E-03	1.48E+03	
MW-03S	Falling Head	Hvorslev	2.51E-03	7.91E+02	
MW-03S	Rising Head	Hvorslev	2.49E-03	7.86E+02	
MW-04S	Falling Head	Hvorslev	7.49E-03	2.36E+03	
MW-04S	Rising Head	Hvorslev	7.16E-03	2.26E+03	
MW-06S	Rising Head	Hvorslev	5.18E-03	1.63E+03	
MW-07S	Falling Head	Hvorslev	5.40E-02	1.70E+04	
MW-07S	Rising Head	Hvorslev	2.18E-02	6.88E+03	
	· · · ·	Geometric mean	9.11E-03	2.88E+03	

The geometric mean of the single well response tests is 2.88E+03 m/y. This result is generally consistent with laboratory permeater tests on soil samples collected in December 2012 and September 2013. These data are also in the range of hydraulic conductivity for a sand material based on literature values. The single well response tests are considered to better represent in situ aquifer conditions than laboratory permeater tests.

5.7. Saturated Zone Hydraulic Gradient

Hydraulic gradients were estimated for areas in the central plant area (east of the Turbine Building), the southern plant area (which is generally unaffected by the sheet pile wall) and the western area (upgradient of the PA). The resulting hydraulic gradients are described in Table 5.10 below:

Table 5.10Hydraulic Gradient						
	Western Area Gradient	Southern Area Gradient	Central Area Gradient			
Date	(near MW-ZN-06s)	(near MW-ZN-05s)	(near MW-ZN-01s)			
July 2006	0.0015	0.0054	0.0000 - 0.0040			
October 2007	0.0016	0.0050	0.0000 - 0.0042			
September 2008	0.0020	0.0059	0.0000 - 0.0038			
September 2009	0.0012	0.0027	0.0000 - 0.0038			
September 2010	0.0019	0.0059	0.0000 - 0.0040			
September 2011	0.0021	0.0056	0.0000 - 0.0022			

Table 5.10 Hydraulic Gradient					
Date	Western Area Gradient (near MW-ZN-06s)	Southern Area Gradient (near MW-ZN-05s)	Central Area Gradient (near MW-ZN-01s)		
September 2012	0.0022	0.0044	0.0000 - 0.0053		
March 2013	0.0022	0.0056	0.0000 - 0.0042		
Average	0.0018	0.0051	0.0000 - 0.0039		

Note: The central area is that region that includes the Protected Area of the Site.

The RESRAD model may be used for scenarios where the sheet pile wall is in place (using a conservative gradient of 0.0039 ft/ft). Alternately, if the scenario assumes that the sheet pile wall has been removed or degraded over time, the natural gradient downgradient of the PA is expected to be 0.0051 ft/ft.

5.8. Groundwater Velocity

The groundwater velocity can be calculated by the equation:

$$V = \frac{K \cdot i}{\theta_T}$$

where: K is the hydraulic conductivity

i is the hydraulic gradient

 θ_{T} is the total soil porosity

Groundwater velocities for different scenarios are provided in Table 5.11 below.

Table 5.11Estimates of Groundwater Velocity				
Scenario	Hydraulic Gradient	Groundwater Velocity (m/y)		
Assuming structures and basements remain in place	0.0039	31.8		
Assuming structures and basements are removed	0.0051	41.6		
Notes: 1. Using a hydraulic conductivity of 2.88E+03 m/y and a total porosity of 35.3%				

5.9. Precipitation

The average precipitation for the Site was estimated using weather information from the Waukegan Harbor station (WHRI2), located approximately 5 miles south of the Site, for the period from 2003 through 2012. Table 5.12 presents a summary of the precipitation data:

	Precipitation	Precipitation	
Year	(inches) (26)	(meters)	
012	26.87	0.682	
011	38.28	0.972	
010	30.21	0.767	
009	42.50	1.080	
008	37.69	0.957	
007	32.72	0.831	
006	32.92	0.836	
005	20.63	0.524	
004	33.98	0.863	
003	30.34	0.771	
verage	32.61	0.828	
tandard Deviation	6.19	0.157	

5.10. Runoff Coefficient

A runoff coefficient value of 0.2 is identified as the RESRAD default value. Site-specific runoff coefficients can be developed based on soil type and land use based on the information provided in Table 5.13:

Table	e 5.13 RESRAD Runoff Coefficients		
Envii	ronment	Coefficient	Value
	Flat land with average slopes of 0.3 to 0.9 m/mi	C ₁	0.3
	Hilly land with average slopes of 46 to 76 m/mi	C ₁	0.1
4	Rolling land with average slopes of 4.6 to 6.1 m/mi	C ₁	0.2
ltura	Intermediate combinations of clay and loam	C ₂	0.2
Agricultural [†]	Open sandy loam	C ₂	0.4
	Tight, impervious clay	C ₂	0.1
	Cultivated lands	C ₃	0.1
	Woodlands	C ₃	0.2
	Flat, residential area — about 30% impervious	Cr	0.4
Urban	Moderately steep, residential area — about 50% impervious	Cr	0.65
Ľ.	Moderately steep, built-up area — about 70% impervious	Cr	0.8
Notes †The	s: runoff coefficient for an agricultural environment is given by C _r = 1 - c ₁ - c ₂ - c	с ₃ (18 рр. Е-7).	

A Site-specific runoff coefficient for the post-decommissioning land use of 0.2 has been estimated based on an agricultural environment with flat land, open sandy loam, and cultivated lands (1 - 0.3 - 0.4 - 0.4)

0.1 = 0.2). A runoff coefficient of 0.2 is appropriate for the Site because it is consistent with the proposed post-decommissioning land use of the Site and is also the broadly applicable default value.

Additionally, the RESRAD runoff coefficient appears to be based on the "Rational Method" for calculating peak flows from small watersheds. Tables of runoff coefficients for the Rational Method should be compatible with RESRAD and may be used to develop different model scenarios (27) (12 pp. 61-62).

5.11. Well Pump Intake Depth

The model scenario includes a hypothetical well installed in the shallow sand aquifer with a pump intake at the base of the aquifer. Based on the "Thickness of Contaminated Zone" parameter (Section 5.1), the pump intake depth is 33.44 ft (10.19 meters) for this scenario.

5.12. Contaminated Fraction Below Water Table

The contaminated fraction below the water table is based on the CSM. The following two scenarios are evaluated:

- Scenario 1 contaminated zone from water table to top of aquitard
- Scenario 2 contaminated zone from ground surface to top of aquitard

Under the current CSM, Scenario 1 is the preferred alternative.

5.12.1. Scenario 1 – Contaminated Zone from Water Table to Top of Aquitard

This scenario assumes that contamination extends from the water table to the top of the Silty Clay Aquitard at the base of the Shallow Aquifer. The contaminated fraction below the water table under this scenario is 100%.

5.12.2. Scenario 2 – Contaminated Zone from Ground Surface to Top of Aquitard

This scenario assumes that contamination extends from the ground surface to the top of the Silty Clay Aquitard at the base of the Shallow Aquifer. The contaminated fraction below the water table can be estimated using the boring logs for the wells situated immediately downgradient from the central plant area. This is summarized in Table 5.14:

Table 5.14Contaminated Fraction Below the Water Table				
Boring	Ground Surface (ft amsl)	Groundwater Surface on March 13, 2013 (ft amsl)	Aquitard Surface (ft amsl)	Fraction Below the Water Table
MW-ZN-01S	591.43	578.95	562.18	57%
MW-ZN-02S	591.21	579.43	555.21	67%
MW-ZN-03S	591.54	579.72	556.54	66%
MW-ZN-04S	591.01	579.47	557.51	66%
Average				64%

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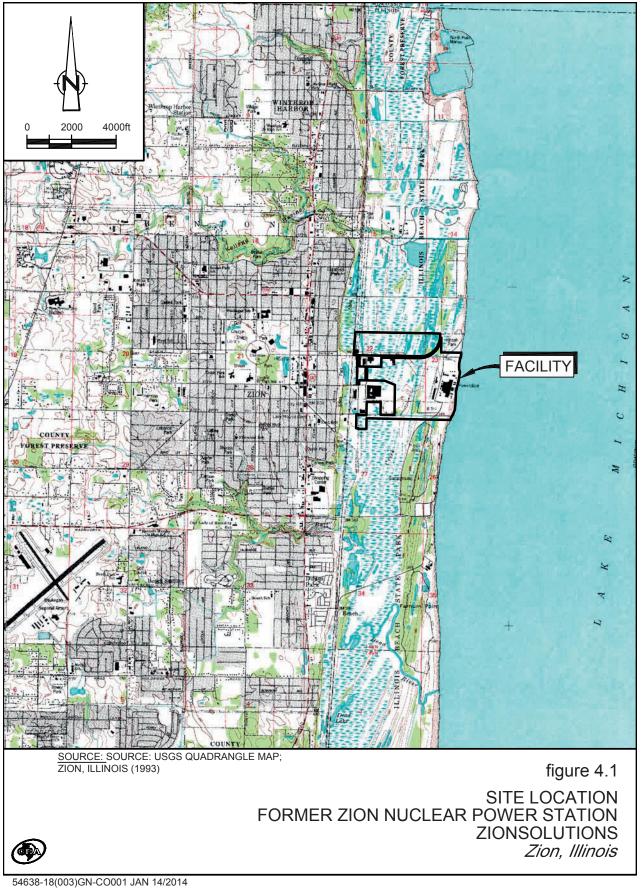
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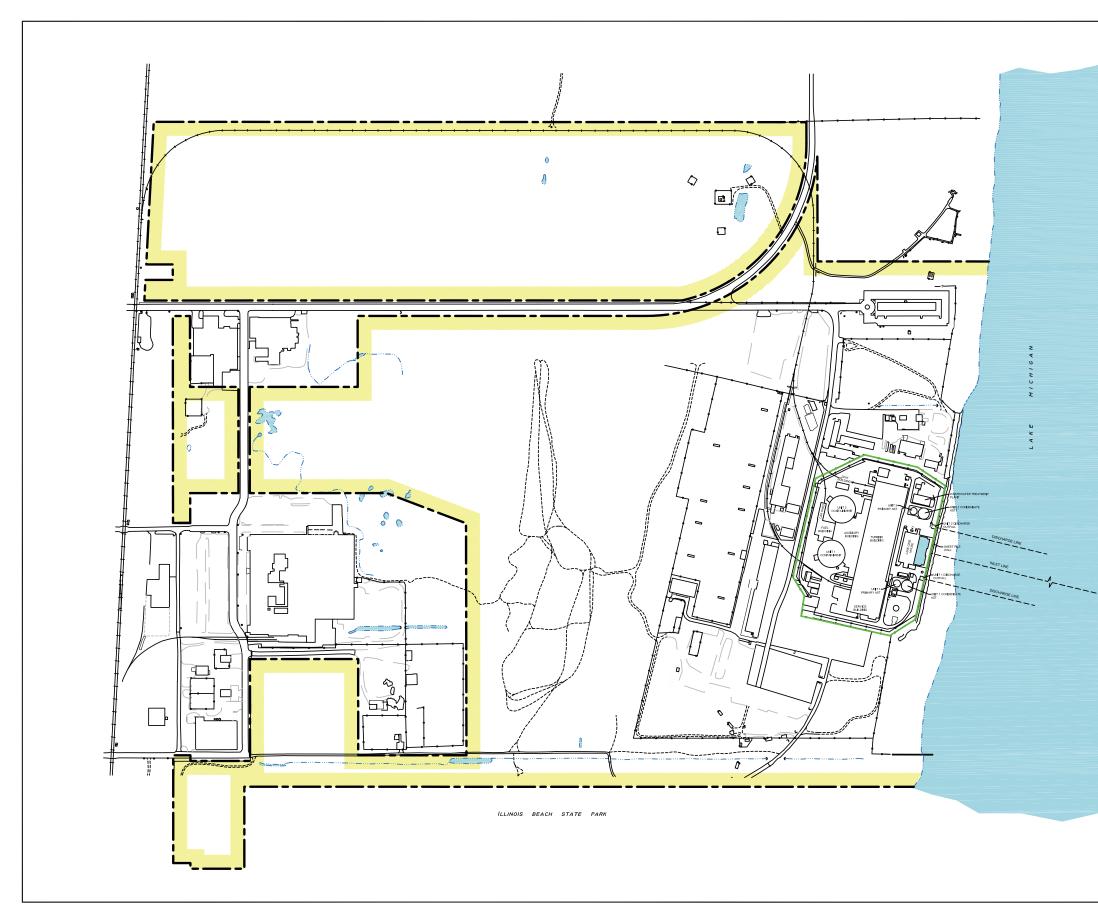
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 SCALE VERIFICATION THIS BAR MEASURES 1° ON ORIGINAL. ADJUST SCALE ACCORDINGLY.
SITE PLAN FORMER ZION NUCLEAR POWER STATION ZION, ILLINOIS
Source Reference: RUSSELL WAID DILLON SURVEYING SERVICES, ZION NUCLEAR GENERATING STATION, 5-3-2000
Project Manager: Reviewed By: Date: AUGUST 2013
Scale: Project N ² : Report N ² : Drawing N ² : AS SHOWN 54638-18 003 figure 4.2

54638-18(003)GN-CO002 JAN 14/2014

Appendix A

August 2012 Subsurface Investigation to Determine Site Specific Partition Coefficient (Kd) Values Letter Report (dated September 17, 2012)



8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631-3501 Telephone: (773) 380-9933 Fax: (773) 380-6421 www.CRAworld.com

September 17, 2012

Reference No. 054638

Mr. Robert Decker ZionSolutions, LLC 101 Shiloh Blvd Zion, IL 60099

Dear Mr. Decker:

Re: Subsurface Investigation to Determine Site-Specific Partition Coefficient (Kd) Values Zion Nuclear Power Station Decommissioning Project

Conestoga-Rovers & Associates (CRA) was retained by ZionSolutions, LLC (ZionSolutions) for hydrogeology consulting services related to the decommissioning of the Zion Nuclear Power Station in Zion, Lake County, Illinois (Site). On August 20-21, 2012, CRA participated in a subsurface investigation to collect samples for laboratory analysis of Site-specific partition coefficients (K_d) for cobalt (⁶⁰Co), cesium (¹³⁷Cs), strontium (⁹⁰Sr), iron (⁵⁵Fe), and nickel (⁶³Ni).

The subsurface investigation included the advancement of three soil borings in the vicinity of existing monitoring wells on the eastern portion of the Site. The location of each soil boring is described in the following table:

Identifier	Narrative Location	Northing	Easting
Kd-SB-MW-1s	Approximately 28 feet east of MW-1s	641831.57	343806.08
Kd-SB-MW-2s	Approximately 10 feet north of MW-2s	641785.68	343788.49
Kd-SB-MW-3s	Approximately 12 feet northwest of MW-3s	641725.42	343770.03

Drilling services were provided by Direct Push Analytical Corp. of St. Charles, Illinois using a Geoprobe 7822DT track mounted rig. Samples were collected continuously using a 2.25-inch outer diameter by 48-inch probe rod equipped with polyethylene terephthalate (PETG) liners. The borings were logged by a CRA geologist. The boring logs are provided in Attachment 1.

Soil samples were selected for laboratory analysis based on the professional judgment of the field geologist to be representative of the following stratigraphic units at the Site:

- **Fill Sand** Sand which originated as natural beach sand excavated during the construction of the facility in the early 1970s and then returned to the excavation as fill material;
- **Native Sand** Beach sand which was not disturbed by construction activities at the facility; and,

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Worldwide Engineering, Environmental, Construction, and IT Services



September 17, 2012

2

Reference No. 054638

• **Silts and Clays** – Low permeability deposits of natural lake bottom and glacial till material which underlie the upper sand units.

The following soil samples were selected for laboratory analysis:

Boring	Depth Interval (feet bgs)	Sample Number	Stratigraphic Unit
Kd-SB-MW-01s	12-16	L112102CJGSSB001B	fill sand (saturated)
Kd-SB-MW-01s	24-28	L112102CJGSSB001C	native sand (saturated)
Kd-SB-MW-01s	32-36	L112102CJGSSB001D	silt
Kd-SB-MW-03s	24-28	L212204CJGSSB002C	silt and clay

The samples were screened for radiological contamination in accordance with ZionSolutions' standard operating procedures prior to shipment to the Brookhaven National Laboratory via overnight courier.

If you have any questions or comment, please feel free to contact me by email (<u>dsoutter@craworld.com</u>) or telephone (773-380-9933).

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Douglas G. Soutter

DS/ko/1 Encl.

cc: Phil Harvey, CRA

ATTACHMENT 1

	STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN) Page 1 of 1								
PROJE	CT NAME: Zion Solutions Facility		DESIGNATION: Kd-SB-N	IW-15	5				
	CT NUMBER: 054638	DATE	COMPLETED: August 20, 201	2					
	: Zion Solutions		NG METHOD: Geoprobe						
	ION: Zion, Illinois		PERSONNEL: D. Soutter						
	NG CONTRACTOR: Direct Push Analytical Corp.		ER: B. Kinzer						
DEPTH		DEPTH				SAMF	PLE		
ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ft BGS	BOREHOLE	Ř	AL	t)	щ		
				NUMBER	NTERVAL	REC (ft)	'N' VALUE		
_	ASPHALT	0.30	Asphalt		4				
-2	GRAVEL (paving base)	•••		1GP	P/S				
F _	SW SAND, trace silt, trace gravel, fine to medium grained sand, poorly sorted, medium								
-4	brown, dry to moist	••••							
È.		· · · ·							
6		••••		2GP	P/S				
-					2 A A				
10	- • •			3GP	P/S				
- 12	- saturated at 12.0ft BGS								
- 12									
14	- dark brown at 13.5ft BGS	•••		4GP 12-16'	P/S				
-				12-10					
— 16	- medium gray-brown at 16.0ft BGS								
	- • •		Bentonite	5GP	P/S				
	- gravel from 19.2 to 19.3ft BGS		Chips						
20									
- 22	GW GRAVEL, sandy, fine grained rounded	21.00		6GP	P/S				
	gravel, fine to coarse grained sand, poorly sorted, medium gray-brown, saturated			UGF					
24	SW SAND, trace fine grained rounded gravel, fine to medium grained sand, poorly sorted,	••••							
-	medium gray-brown, saturated			7GP					
26	- coarse grained sand, some fine grained gravel from 25.5 to 26.0ft BGS	• • • • •		24-28'	P/S				
	- fining upward sequence (native) from 27.2 to	27.90							
E	27.4ft BGS ML SILT, sandy, fine grained sand, low								
- 30	plasticity, gray, moist to saturated			8GP	P/S				
34				9GP 32-36'	P/S				
36	END OF BOREHOLE @ 36.0ft BGS	36.00				1			
5∟ ⊊—38	Survey Unit 12102, Northing 641831.57,								
	Easting 343806.08								
40									
5									
44									
9 – 44 – 44	NOTES: MEASURING POINT ELEVATIONS MAY CHANGE	; REFER TO	CURRENT ELEVATION TABLE	1	I	I]		
5	CHEMICAL ANALYSIS								

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN) Page								e 1 of 1
PROJE	CT NAME: Zion Solutions Facility	HOLE [DESIGNATION: Kd-SB-M	W-28	S			
	CT NUMBER: 054638	DATE (COMPLETED: August 21, 201	2				
CLIENT	T: Zion Solutions	DRILLI	NG METHOD: Geoprobe					
LOCAT	ION: Zion, Illinois	FIELD F	PERSONNEL: D. Soutter					
DRILLI	NG CONTRACTOR: Direct Push Analytical Corp.	DRILLE	R: B. Kinzer					
DEPTH	STRATIGRAPHIC DESCRIPTION & REMARKS	DEPTH	BOREHOLE			SAMF	LE	
ft BGS		ft BGS	BORLINGEE	L H	VAL	(ŧ	Щ	
				NUMBER	INTERVAL	REC (ft)	'N' VALUE	
	GW GRAVEL, sandy, fine to coarse grained gravel, poorly sorted, light brown, dry	0.40	n received					
-2	SW SAND, some silt, trace clay, trace gravel,			1GP	P/S			
	fine to medium grained sand, medium brown,							
-4								
6				2GP	P/S			
	0 0 0 0 0							
8								
- 10	0 0 0 0			3GP	P/S			
				501				
- 12	- saturated at 12.0ft BGS		¥		e e			
-								
14 	- dark brown at 15.0ft BGS			4GP	P/S			
- 16	 							
_	- clay, stiff, brown, saturated from 16.8 to							
— 18 _	0 0 0 0 0			5GP	P/S			
20			Bentonite					
	۰ ۵۵ ۵۵		Chips		5 A A			
-22	- concrete fragments from 21.8 to 22.0ft BGS			6GP	P/S			
	- little gravel at 22.5ft BGS	· · · ·						
	- silty at 24.5ft BGS							
26				7GP	P/S			
	ML SILT, little fine grained sand, low plasticity, medium gray, moist to wet	26.80						
	medium gray, moist to wet							
30				8GP	P/S			
-	- clay from 31.0 to 31.1ft BGS - gravel from 31.3 to 31.4ft BGS				4 C 1			
-32	- graver roll 31.5 to 31.4it boo							
34	- some organic material from 34.2 to 34.4ft			9GP	P/S			
	BGS							
36	- clay from 34.9 to 35.3ft BGS CL CLAY, some silt, trace gravel, stiff,	36.00						
3 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	moderate plasticity, dark gray, moist to wet (lake bottom)	39.00		10GP	P/S			
2 	END OF BOREHOLE @ 39.0ft BGS	- 39.00						
	Survey Unit 12204, Northing 641785.68,							
°°°−42	Easting 343788.49							
2 - 44								
2 - 44	NOTES: MEASURING POINT ELEVATIONS MAY CHANGE	; REFER TO	CURRENT ELEVATION TABLE					
	WATER FOUND ♀ 8/21/12							

(STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN) Page 1 of 1								
F	PROJE	CT NAME: Zion Solutions Facility	HOLE D	DESIGNATION: Kd-SB-M	W-35	6			
F	PROJE	CT NUMBER: 054638	DATE C	COMPLETED: August 20, 2012	2				
0	CLIENT	: Zion Solutions	DRILLIN	NG METHOD: Geoprobe					
L	OCAT	ION: Zion, Illinois	FIELD F	PERSONNEL: D. Soutter					
	ORILLI	NG CONTRACTOR: Direct Push Analytical Corp.	DRILLE	R: B. Kinzer					
	EPTH	STRATIGRAPHIC DESCRIPTION & REMARKS	DEPTH	BOREHOLE			SAMF	PLE	
П	t BGS		ft BGS		ËR	VAL	(#)	ΠŪ	
					NUMBER	INTERVAL	REC (ft)	'N' VALUE	
E		GRAVEL	0.20	Gravel					
E:	2	SW SAND, little silt, trace gravel, fine to medium grained sand, poorly sorted, medium			1GP	P/S			
E		brown, dry to moist							
-	4								
E	6				2GP	P/S			
E	-								
F	8								
E.	10				3GP	P/S			
F	10				00.				
F	12	- saturated at 11.9ft BGS		¥					
E.	14				4GP	P/S			
F	14	0 ° ° ° 0 0 • 0 • 0 0 • 0 • 0 0 • 0 • 0		Bentonite Chips	401				
E	16								
F.	10				500				
E	18				5GP	P/S			
E:	20	ML SILT, clayey, little fine grained sand, trace	20.10						
ŧ.	00	gravel, stiff, moderate plasticity, dark gray, moist (lake bottom)							
E	22	moist (lake bottom)			6GP	P/S			
E	24								
ŧ.	~~				7GP				
Ē	26				24-28'	P/S			
E:	28	END OF BOREHOLE @ 28.0ft BGS	28.00						
ŧ.	~~								
E	30	Survey Unit 12204, Northing 641725.42, Easting 343770.03							
E;	32								
9/6/12	~ /								
	34								
	36								
CRA_CORP.GDT	~~								
	38								
2-	40								
8 CH									
25	42								
일는,	44								
		NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; RE	EFER TO (URRENT ELEVATION TABLE					
RBUI		WATER FOUND ¥ 8/21/12							
OVE		CHEMICAL ANALYSIS							

Appendix B

December 12, 2012 Geotechnical Subsurface Investigation Letter Report (dated March 1, 2013, revised January 14, 2014)



8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631-3501 Telephone: (773) 380-9933 Fax: (773) 380-6421 www.CRAworld.com

January 14, 2014

Reference No. 054638

Mr. Robert Decker ZionSolutions, LLC 101 Shiloh Blvd Zion, IL 60099

Dear Mr. Decker:

Re: December 12, 2012 Geotechnical Subsurface Investigation Zion Nuclear Power Station Decommissioning Project Revision 1

Conestoga-Rovers & Associates (CRA) was retained by ZionSolutions, LLC (ZionSolutions) for hydrogeology consulting services related to the decommissioning of the Zion Nuclear Power Station in Zion, Lake County, Illinois (Site). On December 12, 2012, CRA participated in a subsurface investigation to collect samples for laboratory analysis of the following geotechnical parameters: porosity, bulk density, particle density, hydraulic conductivity, and grain size.

The subsurface investigation included the advancement of two soil borings in the vicinity of existing monitoring wells on the eastern portion of the Site. The location of each soil boring is described in the following table:

Boring	Narrative Location
GT-MW-01s	Approximately 3 feet north of Kd-SB-MW-1s
GT-MW-02s	Approximately 3 feet north of Kd-SB-MW-2s

Drilling services were provided by Direct Push Analytical Corp. of St. Charles, Illinois using a Geoprobe track mounted rig. Samples were collected continuously using a 2.25-inch outer diameter by 48-inch probe rod equipped with polyethylene terephthalate (PETG) liners. The borings were logged by a CRA geologist. The boring logs are provided in Attachment 1.

Five (5) soil samples were selected for geotechnical analysis based on stratigraphic observations made during the August 2012 Site-specific partition coefficient subsurface investigation. The pre-determined soil sample depths were intended to target the following stratigraphic units at the Site:

• Fill Sand – Sand which originated as natural beach sand excavated during the construction of the facility in the early 1970s and then returned to the excavation as fill material.

• **Native Sand** – Beach sand which was not disturbed by construction activities at the facility.

Boring	Depth Interval (feet bgs ¹)	Sample Identifier	Targeted Stratigraphic Unit
GT-MW-01s	2-5	S-121212-LP-01 (S-01)	fill sand (vadose zone)
GT-MW-01s	16-20	S-121212-LP-02 (S-02)	fill sand (saturated zone)
GT-MW-01s	24-28	S-121212-LP-03 (S-03)	native sand (saturated zone)
GT-MW-02s	2-5	S-121212-LP-04 (S-04)	fill sand (vadose zone)
GT-MW-02s	12-16	S-121212-LP-05 (S-05)	fill sand (saturated zone)

The following soil samples were selected for laboratory analysis:

The samples were screened for radiological contamination in accordance with ZionSolutions' standard operating procedures prior to shipment to CRA's laboratory in Plymouth, Michigan via overnight courier.

<u>Results</u>

The results of the geotechnical analyses of each sample collected are summarized in the tables below. The laboratory report is provided as Attachment 2. The dry soil bulk density results were rejected due to laboratory errors.

Boring	Sample Identifier	Hydraulic	Porosity	Particle
		Conductivity	(%)	Density
		(cm/s^2)		(unitless)
GT-MW-01s	S-121212-LP-01 (S-01)	5.1×10-3	9.25	2.64
GT-MW-01s	S-121212-LP-02 (S-02)	5.6×10-3	16.69	2.67
GT-MW-01s	S-121212-LP-03 (S-03)	9.1×10-3	20.40	2.71
GT-MW-02s	S-121212-LP-04 (S-04)	3.3×10-3	23.97	2.74
GT-MW-02s	S-121212-LP-05 (S-05)	2.4×10-3	25.66	2.66
Arithmetic mean	1		19.19	2.68
Geometric mean	l	4.60×10-3		

¹ bgs – below ground surface.

² cm/s – centimeters per second.

Boring	Sample Identifier	Grain Size Distribution					
		% Gravel	% Silt or Clay				
GT-MW-01s	S-121212-LP-01 (S-01)	4.1	84.1	11.8			
GT-MW-01s	S-121212-LP-02 (S-02)	3.1	90.3	6.6			
GT-MW-01s	S-121212-LP-03 (S-03)	7.9	89.2	2.9			
GT-MW-02s	S-121212-LP-04 (S-04)	5.5	73.0	21.5			
GT-MW-02s	S-121212-LP-05 (S-05)	12.8	77.4	9.8			

If you have any questions or comment, please feel free to contact me by email (<u>dsoutter@craworld.com</u>) or telephone (773-380-9933).

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

R _____ 0 11

Douglas G. Soutter

DS/ko/4 Encl.

cc: Phil Harvey, CRA

ATTACHMENT 1

BORING LOGS

STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)							Page	e 1 of 1	
PROJEC	CT NAME: Zion Solutions Facility		HOLE D	ESIGNATION: GT-MW-	01S				
	CT NUMBER: 054638		DATE C	COMPLETED: December 12,	2012				
CLIENT	: Zion Solutions		DRILLIN	NG METHOD: Geoprobe					
LOCATI	ON: Zion, Illinois			PERSONNEL: L. Punch					
	IG CONTRACTOR: Direct Push Analytical Corp.			R: Kevin					
DEPTH			DEPTH				SAMF	۶LE	
ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS		ft BGS	BOREHOLE	ĸ	AL	f)	TEST	
					NUMBER	INTERVAL	REC (ft)	DYE TE	
_	ASPHALT		0.30	Asphalt		4			
- - 2	Sample collected for gamma spectroscopy analysis		2.00		1DPT	P/S	1.6		
- 2	Sample collected for geotechnical analysis		2.00		2DPT				
-					2-5'	P/S	2.5		
-4									
F	SP SAND, fine grained, trace coarse grained	2,52.5	5.00			4			
6	sand and fine grained subangular gravel, brown, slightly moist								
-					3DPT	P/S	3.2		
	 some fine grained subangular gravel from 7.5 to 7.9ft BGS 								
E	 with coarse grained angular gravel from 8.0 to 8.2ft BGS 								
-	10 0.211 1005								
					4DPT	P/S	2.5		
	Not sampled	- 1997	11.00						
-12									
-					5DPT	P/S			
14 				Sand					
- 16	Sample collected for geotechnical analysis		16.00						
-					ODDT				
- 18					6DPT 16-20'	P/S	2.3		
-					10 20		2.0		
-									
20	Not sampled		20.00		1		4		
-									
2-22					7DPT	P/S			
					1				
5-									
24	Sample collected for geotechnical analysis		24.00				4		
					8DPT				
26					24-28'	P/S	3.0		
			00.00						
28 	END OF BOREHOLE @ 28.0ft BGS		28.00			,	1		
- 28 - 28 - 28 	NOTES: MEASURING POINT ELEVATIONS MAY CHAN			LIRRENT ELEVATION TAPLE	1				
	TOTES WEROOKING FOUNT ELEVATIONS WAT CHAP	10L, KI		JUNCENT LEVATION TABLE					
	GRAIN	SIZE A	NALYSIS						

	STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN) Page 1 of 1								
PROJE	CT NAME: Zion Solutions Facility	HOLE D	ESIGNATION: GT-MW-	02S					
PROJE	CT NUMBER: 054638	DATE C	OMPLETED: December 12, 2	2012					
CLIENT	: Zion Solutions	DRILLIN	NG METHOD: Geoprobe						
LOCATI	ION: Zion, Illinois	FIELD F	PERSONNEL: L. Punch						
DRILLIN	NG CONTRACTOR: Direct Push Analytical Corp.	DRILLE	R: Kevin	1					
DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	DEPTH ft BGS	BOREHOLE			SAMF	PLE		
11 BGS		11 BGS		ER	VAL	(#	TEST		
				NUMBER	NTERVAL	REC	DYE T		
	GP GRAVEL, with silt	0.20	Gravel				_		
-	SP SAND, fine grained, trace fine to coarse grained gravel, compact, brown, slightly moist			1DPT	P/S	1.4			
-2	Sample collected for geotechnical analysis	2.00							
_									
				2DPT					
4				2-5'	P/S	2.9			
- 4									
-	SP SAND, fine grained, trace fine to coarse	5.00							
-	grained gravel, compact, brown, slightly moist			-					
-6	SW SAND, fine to coarse grained, little fine to	6.00 6.20							
-	coarse grained gravel, compact, brown, slightly moist	1		3DPT	P/S	2.2			
	SP SAND, fine grained, trace fine to coarse	7.20							
-8	grained gravel, compact, brown, slightly moist CL CLAY, silty, firm, brown, moist	1.50							
-	SP SAND, fine grained, trace fine to coarse		Sand	-					
_	grained gravel, compact, brown, slightly moist CL CLAY, little fine to coarse grained sand								
-	and fine grained gravel, stiff, brown, slightly								
- 10	SP SAND, fine grained, trace fine to coarse	10.00 10.20		4DPT	P/S	2.7			
	grained gravel, compact, brown, slightly moist								
_	- some fine to coarse grained gravel from 9.5 to 9.7ft BGS	성							
- 12	CL CLAY, silty, trace fine to coarse grained	12.00							
-	SP SAND, fine grained, trace fine to coarse								
-	grained gravel, compact, brown, slightly moist Sample collected for geotechnical analysis								
				5DPT		25			
- 14				12-16'	P/S	2.5			
L									
— 16 —	END OF BOREHOLE @ 16.0ft BGS	16.00							
2 - 5 - 18									
040									
	NOTES: MEASURING POINT ELEVATIONS MAY CHANGE;	REFER TO (L CURRENT ELEVATION TABLE	1					
8	GRAIN SIZE	ANALYSIS							

ATTACHMENT 2

GEOTECHNICAL LABORATORY REPORT

				.						She	et 1 of 1
Borehole	Depth ()	Liquid Limit	Plastic Limit	Plasticity Index	Maximum Size (mm)	%<#200 Sieve	Class- ification	Water Content (%)	Dry Density (pcf)	Satur- ation (%)	Void Ratio
S-01	2				12.5	12		6.9	149.7		
S-02	2				12.5	7		14.7	138.8		
S-03	16				18.75	3	SP	17.8	134.6		
S-04	2		T		18.75	21		3.6	130.0		
S-05	12		1		25	10		10.1	123.4		





Summary of Laboratory Results

Project Name: Zion Former Generating Facility Project Number: 054638 Client: Energy Solutions Location: Zion, IL



Project: Zion Former Generating Facility	Project No.: 054638
Boring No.:	Sample No.: S-01
Description of Soil: (SP-SM)	Sample Depth: 2'-5'
Tested By: R. Bentley	1/10/2013

			-
Test No.	1	2	
Method of Air Removal	Vacuum	Vacuum	
Mass fl. + Water + Soil = M _{bws}	390.1	389.6	*after deairing
Temperature, °C	22	22	-
Mass fl. + Water ^b = M _{bw}	358.8	358.8	*flask + water after deairing
Tare No.	N/A	N/A	
Tare Wt.	0	0	
Wt. Tare + Dry Soil	50	50	
Wt. Dry Soil = M _s	50	50	
$M_{w} = M_{s} + M_{bw} - M_{bws}$	18.7	19.2	Mass of water
$\alpha = \rho_{\rm T} / \rho_{20} {}^{\circ}{}_{\rm C}$	0.9996	0.9996	from table below
$G_{s} = \alpha M_{s}/M_{w}$	2.67	2.60	
Average		2.64	Τ (°C)

Average

T (°C)	α
16	1.0007
18	1.0004
20	1
22	0.9996
24	0.9991
26	0.9986

-



Project: Zion Former Generating Facility	Project No.: 054638
Boring No.:	Sample: S-02
Description of Soil: (SP-SM)	Sample Depth: 2'-5'
Tested By: R. Bentley	1/10/2013

			-
Test No.	1	2	
Method of Air Removal	Vacuum	Vacuum	
Mass fl. + Water + Soil = M _{bws}	390.2	389.9	*after deairing
Temperature, °C	22	22	
Mass fl. + Water ^b = M _{bw}	358.8	358.8	*flask + water after deairing
Tare No.	N/A	N/A	_
Tare Wt.	0	0	4
Wt. Tare + Dry Soil	50	50	_
Wt. Dry Soil = M _s	50	50	
$M_{\rm w} = M_{\rm s} + M_{\rm bw} - M_{\rm bws}$	18.6	18.9	*Mass of water
$\alpha = \rho_T / \rho_{20} c$	0.9996	0.9 9 96	*from table below
$G_s = \alpha M_s / M_w$	2.69	2.64	
Average		2.67	<u>T (°C)</u>

T (°C)	α
16	1.0007
18	1.0004
20	1
22	0.9996
24	0.9991
26	0.9986



Project: Zion Former Generating Facility	Project No.: 054638
Boring No.:	Sample No.: S-03
Description of Soil: (SP)	Sample Depth: 16'-20'
Tested By: R. Bentley	1/10/2013

	_		-
Test No.	1	2	
Method of Air Removal	Vacuum	Vacuum	
Mass fl. + Water + Soil = M _{bws}	391	389.6	*after deairing
Temperature, °C	22	22	
Mass fl. + Water ^b ≕ M _{bw}	358.8	358.8	*flask + water after deairing
Tare No.	N/A	N/A	
Tare Wt.	0	0	
Wt. Tare + Dry Soil	50	50	_
Wt. Dry Soil = M _s	50	50	
$M_{\rm w} = M_{\rm s} + M_{\rm bw} - M_{\rm bws}$	17.8	19.2	*Mass of water
$\alpha = \rho_T / \rho_{20} \circ_C^{\circ}$	0.9996	0.9996	*from table below
$G_s = \alpha M_s / M_w$	2.81	2.60	
Average		2.71	T (°C)

T (°C)	α
16	1.0007
18	1.0004
20	1
22	0.9996
24	0.9991
26	0.9986



Project: Zion Former Generating Facility	Project No.: 054638	
Boring No.:	Sample No.: S-04	
Description of Soil: (SP)	Sample Depth: 2'-5'	
Tested By: R. Bentley	1/10/2013	

			•
Test No.	1	2	
Method of Air Removal	Vacuum	Vacuum	
Mass fl. + Water + Soil = M _{bws}	391.2	389.9	*after deairing
Temperature, ⁰C	22	22	
Mass fl. + Water ^b = M _{bw}	358.8	358.8	*flask + water after deairing
Tare No.	N/A	N/A	
Tare Wt.	0	0	
Wt. Tare + Dry Soil	50	50	
Wt. Dry Soil = <u>M_s</u>	50	50	
$M_{w} = M_{s} + M_{bw} - M_{bws}$	17.6	18.9	*Mass of water
$\alpha = \rho_{\rm T} / \rho_{\rm 20 \ G}$	0.9996	0.9996	*from table below
$G_s = \alpha M_s / M_w$	2.84	2.64]
Average		2.74	$\frac{T(^{\circ}C)}{40} = \frac{a}{40}$

.

T (°C)	α
16	1.0007
18	1.0004
20	1
22	0.9996
24	0.9991
26	0.9986



Project: Zion Former Generating Facility	Project No.: 054638
Boring No.:	Sample No.: S-05
Description of Soil: (SP)	Sample Depth: 12'-16'
Tested By: R. Bentley	1/10/2013

			1
Test No.	1	2	
Method of Air Removal	Vacuum	Vacuum	
Mass fl. + Water + Soil = M _{bws}	390.7	390.4	*after deairing
Temperature, °C	22	22	
Mass fl. + Water ⁵ = M _{bw}	359.1	359.6	*flask + water after deairing
Tare No.	N/A	N/A	
Tare Wt.	0	0	4
Wt. Tare + Dry Soil	50	50	4
Wt. Dry Soil = M _s	50	50	
$M_{w} = M_{s} + M_{bw} - M_{bws}$	18.4	19.2	*Mass of water
$\alpha = \rho_T / \rho_{20} \circ_G$	0.9996	0.9996	from table below
$G_s = \alpha M_s / M_w$	2.72	2.60	
Average		2.66	Τ (° C)

Τ (°C)	α
16	1.0007
18	1.0004
20	1
22	0.9996
24	0.9991
26	0.9986

Þ) CON & AS	SOCIA	GA-I TES	ROVE	RS [PERMEABI	LITY TEST ON SOILS ASTM D 2434	GRANULAR
PROJECT: LOCATION CLIE NT : PROJECT	1:	Zion Form Zion, IL Energy Sc 54638		ating Facili	ty			
SAMPLE D SAMPLE L SAMPLE D SAMPLE D SAMPLED	OCATION:	12/12/12 S-01 2' - 5' Lisa Punch				TEST DATE: TESTED BY: LAB No. : CHECKED BY		14-Jan-13 D. Kribs R. Bentley
Descriptio	n of Soil:	(SP-SM) SA	ND, frace s	ilt and grave	1			
Unit Weig)	nt Determina	tion:						
Diameter U		7.62			-	compaction in	the cell:	7%
Area A (cm Sample hei	r): ight H (cm):	<u>45.60</u> 15		Dry Density Ratio of star		of :		112.4
Dry weight		1232.2				-		
Particle Siz	e Summary	Percent						
	Dinus Cine	Finer By						
G	Sieve Size	Weight						
r	3"							
a v	3/4"	100						
e		100						
	#4	95.9						
S	#10	91.4						
a n	#40	81.1						
d								
	#200	11.8						
Permeabil	ity Test Res	ultə						
	Test No.	Head 'h' cm	Q cm ³	t (sec)	Q/At	h/L	Permeability k (cm/sec)	
	1	106	200	86	0.051	7.067	7.2E-03	1
	2	101	200	107	0.041	6.733	6.1E-03	
						1		
	3	96	200	130	0.034	6.400	5.3E 03	
	4	ូ <u></u> ព្រ	200	166	0.026	6.067	4.4E 03	
	5	86	200	194	0.023	5.733	3.9E-03	
	6	81	200	206	0.021	5.400	3.9E-03]
2						AVERAGE	5.1E-03	i

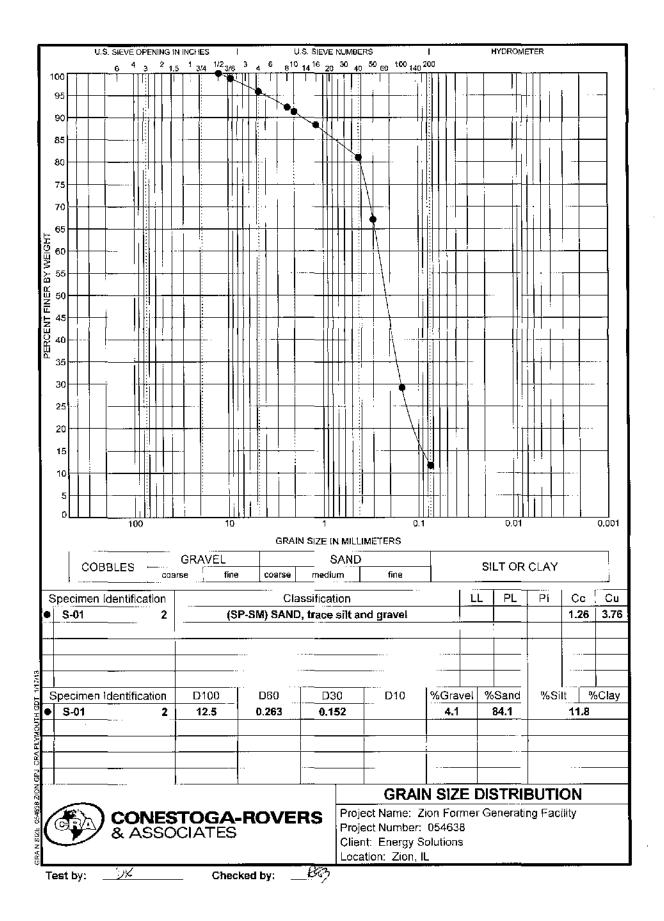
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() A) CON & AS	I ESTO SOCIA	GA-F TES	ROVE	RS [PERMEABI	LITY TEST ON SOILS ASTM D 2434	i
PROJECT: LOCATION CLIENT : PROJECT	ł:	Zion Form Zion, IL Energy So 54638		ating Facili	ty			
SAMPLE D SAMPLE L SAMPLE N SAMPLE D SAMPLED	OCATION: ko.: DEPTH:	12/12/12 S-02 2' -5' Lisa Punch				TEST DATE: TESTED BY: LAB No. : CHECKED B ^V		14-Jan-13 D. Kribs R. Bentley
Descriptio	n of Soil:	(SP-SM) SA	ND, trace s	ilt and grave	I			-
Diameter D Area A (crr		tion: 7.62 45.60 15		Moisture co Dry Density Ratio of star	(lb/ft³):	compaction in	the cell:	15% 117.4
Dry weight Particle Si⊿ G	t (g): 29 Summary Sieve Size 13*	1286.8 Percent Firer By Weight						
r a v e l	3/4" #4	100 96.9						
S a	<i>#</i> 10	92.2						
n d	#40 #200	76.2 6.6						
Permeabil	lity Test Res	· · · · ·						
	Test No.	Head 'h' cm	Q cm³	t (sec)	Q/At	h/L	Permeability k (cm/sec)]
	1	112	200	68	0.064	7.467	8.6E-03]
	2	107	200	94	0.047	7.133	6.5E-03	
	3	102	200	129	0.034	6.800	5.0E-03	
	4	97	200	143	0.031	6.467	4.7E-03	
	5	92	200	153	0.029	6.133	4.7E-03	
	6	87	200	187	0.023	5.800	4.0E-03	
						AVERAGE	5.6E-03	3

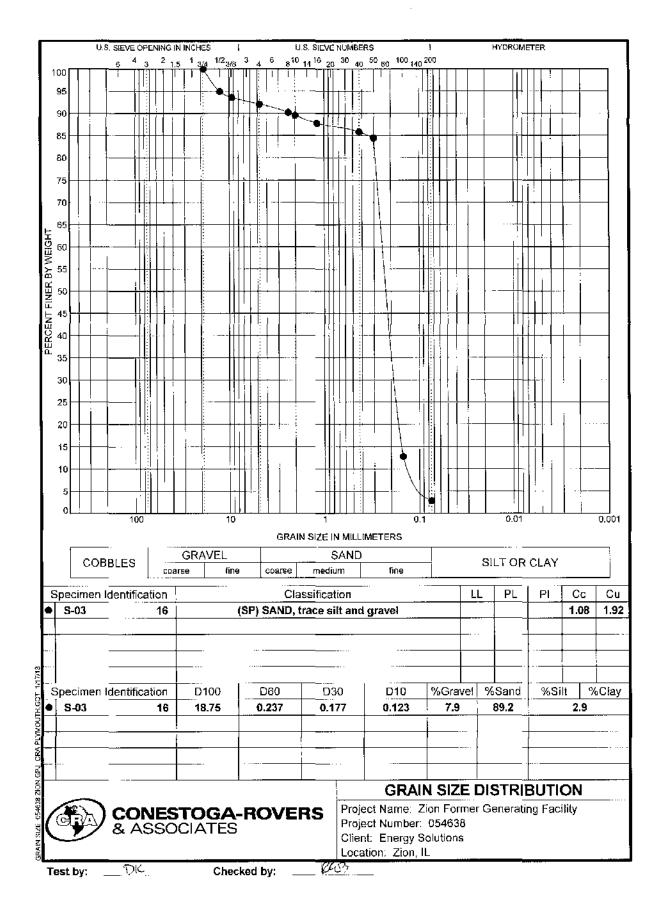
	' & AS	SÕĊIĂ	TES	ROVE	- -	PERMEAB	LITY TEST ON SOILS ASTM D 2434	
PROJECT LOCATICI CLIENT : PROJECT	N;	Zion Form Zion, IL Energy So 54638		eting Facili	ty	····		
SAMPLEI	LOCATION: No.:	<u>12/12/12</u> 5-03				TEST DATE; TESTED BY: LAB No. :		14-Jan-13 D. Kribs
SAMPLE I SAMPLE		16' - 20' Lisa Punch				CHECKED B	Y:	R. Bentley
Descripti	on of Soll:	(SP) SAND,	trac <u>e siit ar</u>	nd gravel				_
Unit Weig	ht Determina	ation:						
Diameter I		6.35			-	compaction in	i the cell:	18%
Area A (cr Samnia be	nf): eight [] (cm):	<u>31.67</u> 15		Dry Density Ratio of star		ar :		119.0
Sample ne Dry weigh	~ ~ /	906		14800013180	walu Procto			
- •								
Particle Si	ze Summary	Percent						
	Sieve Size	Finer By Weight						
G	JOIEVE OIZE							
r	3"							
a v	3" 3/4"	100						
а		100 92.1						
a v e I S	3/4"							
a v e l S a n	3/4" #4	92.1						
a v e I S a	3/4" #4 #10	92.1 89.6						
a vel San d	3/4" #4 #10 #40	92.1 89.6 85.9 2.9						
a vel San d	3/4" #4 #10 #40 #200	92.1 89.6 85.9 2.9	Q cm²	t (sec)	Q/At	h/L	Permeability k {cm/soc)]
a vel San d	3/4" #4 #10 #40 #200	92.1 89.6 85.9 2.9 ulle Head 'h' cm	cm ³				k (cm/sec)	
a vel San d	3/4" #4 #10 #40 #200 Kity Test Res Test No.	92.1 89.6 85.9 2.9 ulte Head 'h' cm 112	cm ³ 200	52	0.1 <u>21</u>	h/L 7.467 7.133	k (cm/sec) 1.6E-02	
a vel San d	3/4" #4 #10 #40 #200 filty Test Res Test No. 1 2	92.1 89.6 85.9 2.9 ulle Head 'h' cm 112_ 107	cm ³ 200 200	52 72	0.1 <u>21</u> 0.088	7.467	k (cm/sec) 1.6E-02 1.2E-02	
a vel San d	3/4" #4 #10 #40 #200 Kity Test Res Test No. 1 2 3	92.1 89.6 85.9 2.9 ullæ Head 'h' cm 112_ 107 102	cm ³ 200 200 200	52 72 84	0.1 <u>21</u> 0. <u>088</u> 0 <u>.075</u>	7.467 7.133 6.800	k (cm/sec) 1.6E-02 1.2E-02 1.1E-02	
a vel San d	3/4" #4 #10 #40 #200 fiity Test Res Test No. 1 2 3 4	92.1 89.6 85.9 2.9 ullæ Head 'h' cm 112_ 107 102_ 97	cm ³ 200 200 200 200	52 72 84 120	0.1 <u>21</u> 0. <u>088</u> 0 <u>.075</u> 0.053	7.467 7.133 6.800 8.467	k (cm/sec) 1.6E-02 1.2E-02 1.1E-02 8.1E-03	
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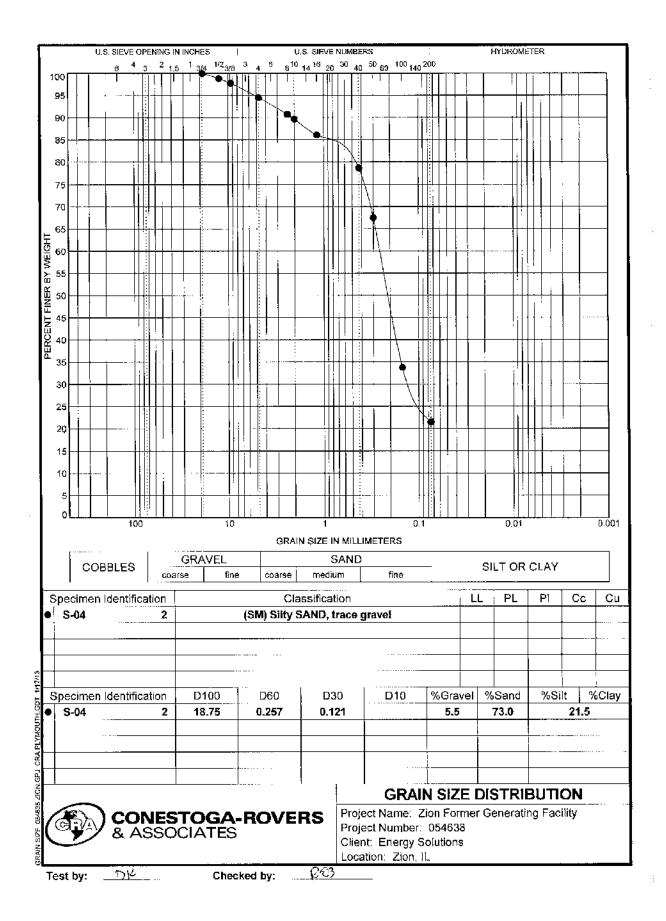
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	3	102	200	193	0.023	6.800	3.3E-03	
	4	97	200	218	0.020	6.467	3.1E-03	
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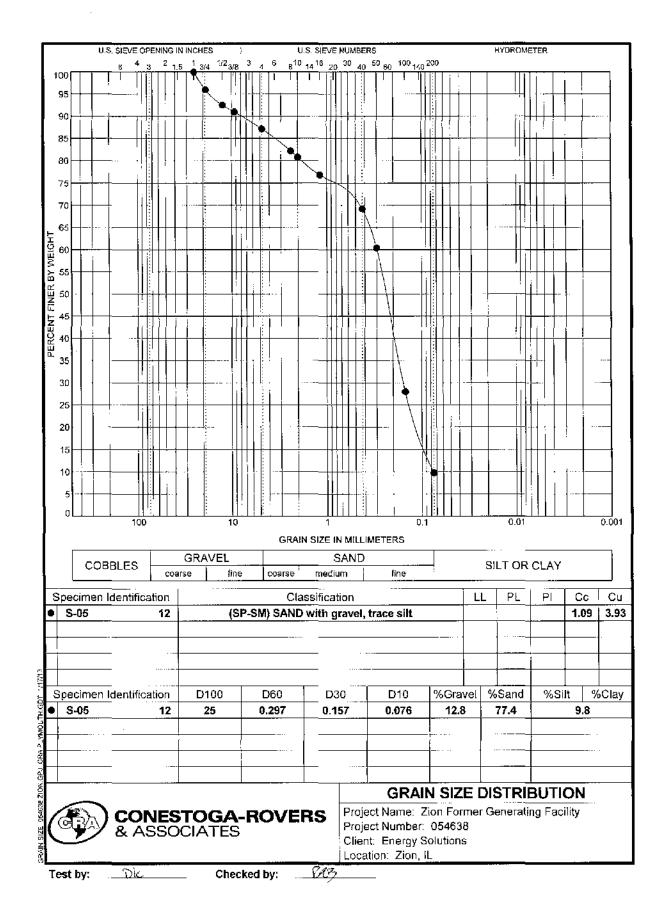
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CRA Project No. 054638 Zion Former Generating Facility Zion, IL Soil Porosity

Sample Date	Sample ID	Dry Unit Weight (pcf)	Specific Gravity	Water Unit Weight (pcf)	Void Ratio	Porosity (%)
12/12/2012	S-01	149.5	2.64	62.4	0.102	9.248737374
12/12/2012	S-02	138.8	2.67	62.4	0.200	16.690675 1 2
12/12/2012	S-03	134.6	2.71	62.4	0.256	20.40401173
12/12/2012	S-04	130	2.74	62.4	0.315	23.96593674
12/12/2012	S-05	123.4	2.66	62.4	0.345	25.65548487

Appendix C

September 30, 2013 Single Well Response Test Letter Report (dated November 13, 2013)



8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631-3501 Telephone: (773) 380-9933 Fax: (773) 380-6421 www.CRAworld.com

November 13, 2013

Reference No. 054638-21

DRAFT

Mr. Robert Decker ZionSolutions, LLC 101 Shiloh Blvd Zion, IL 60099

Dear Mr. Decker:

Re: September 30, 2013 Single Well Response Tests Zion Nuclear Power Station Decommissioning Project

Conestoga-Rovers & Associates (CRA) was retained by ZionSolutions, LLC (ZionSolutions) for hydrogeology consulting services related to the decommissioning of the Zion Nuclear Power Station in Zion, Lake County, Illinois (Site). On September 30, 2013, CRA performed single well response tests (commonly referred to as slug tests) on four onsite monitoring wells located to the east of the Protected Area (PA) (MW-ZN-01S, MW-ZN-02S, MW-ZN-03S, MW-ZN-04S) and two monitoring wells located to the west of the PA (MW-ZN-06S, MW-ZN-07S) to determine the hydraulic conductivity of the shallow sand aquifer. Figure 1 presents the monitoring well locations where single well response tests were conducted. The tests were performed using a slug to rapidly change the water level within the monitoring well. The water level within the well during the test was monitored using a pressure transducer and data logger.

CRA evaluated the data collected by the pressure transducer and data logger to determine the hydraulic conductivity using AQTESOLV software. Groundwater level response data and results from the aquifer test analyses are presented in Attachment A. The Hvorslev method was utilized for analysis. This method is appropriate for unconfined conditions in sand. The calculated hydraulic conductivities for each test and the geometric mean of these values are presented below:

Well ID	Test	Method	Hydraulic Conductivity (ft/sec) ^[1]	Hydraulic Conductivity (cm/sec) ^[2]	Hydraulic Conductivity (m/y) ⁽³⁾
MW-01S	Test 1- Falling	Hvorslev	1.15E-03	3.51E-02	1.11E+04
MW-01S	Test 1- Rising	Hvorslev	8.08E-04	2.46E-02	7.77E+03
MW-02S	Test 2- Falling	Hvorslev	1.43E-04	4.36E-03	1.37E+03
MW-02S	Test 2- Rising	Hvorslev	1.54E-04	4.70E-03	1.48E+03
MW-03S	Test 1- Falling	Hvorslev	8.22E-05	2.51E-03	7.91E+02

¹ ft/sec – feet per second.

² cm/sec – centimeters per second.

 3 m/y – meters per year.

Table Continued

Well ID	Test	Method	Hydraulic Conductivity (ft/sec) ^[1]	Hydraulic Conductivity (cm/sec) ^[2]	Hydraulic Conductivity (m/y) ^[3]
MW-03S	Test 1- Rising	Hvorslev	8.17E-05	2.49E-03	7.86E+02
MW-04S	Test 1- Falling	Hvorslev	2.46E-04	7.49E-03	2.36E+03
MW-04S	Test 1- Rising	Hvorslev	2.35E-04	7.16E-03	2.26E+03
MW-06S	Test 2-2- Rising	Hvorslev	1.70E-04	5.18E-03	1.63E+03
MW-07S	Test 2- Rising	Hvorslev	7.16E-04	2.18E-02	6.88E+03
MW-07S	Test 3- Falling	Hvorslev	1.77E-03	5.40E-02	1.70E+04
Geometric n	nean		2.99E-04	9.11E-03	2.88E+03

The geometric mean of the single well response tests is 2.88E+03 m/y. This result is generally consistent with laboratory permeater tests on soil samples collected in December 2012 and September 2013. The December 2012 hydraulic conductivity laboratory data resulted in a geometric mean of 1.45E+03 m/y and the September 2013 laboratory data resulted in a geometric mean of 1.73E+03 m/y. These data are also in the range of hydraulic conductivity for a sand material based on literature values. The single well response tests are considered to better represent in situ aquifer conditions than laboratory permeater tests.

If you have any questions or comment, please feel free to contact me by email (<u>dsoutter@craworld.com</u>) or telephone (773-380-9933).

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Douglas G. Soutter

DS/ko/13 Encl.

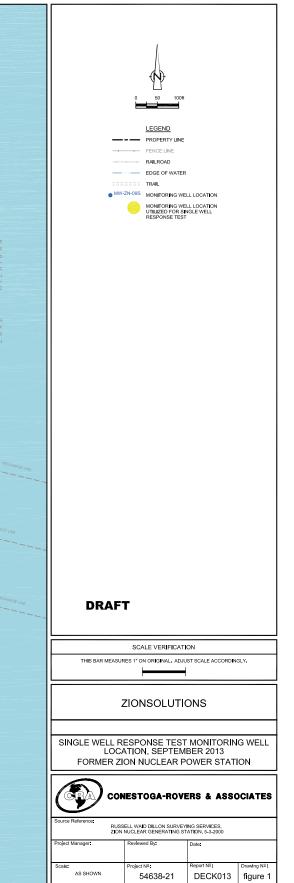
cc: Phil Harvey, CRA

¹ ft/sec – feet per second.

² cm/sec – centimeters per second.

 3 m/y – meters per year.

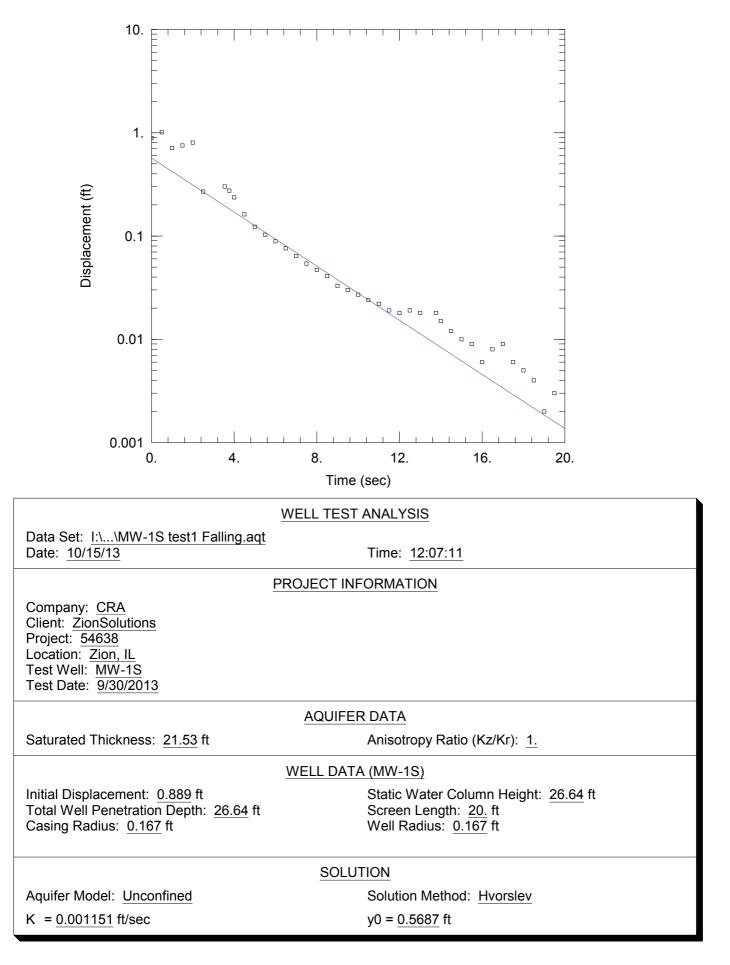


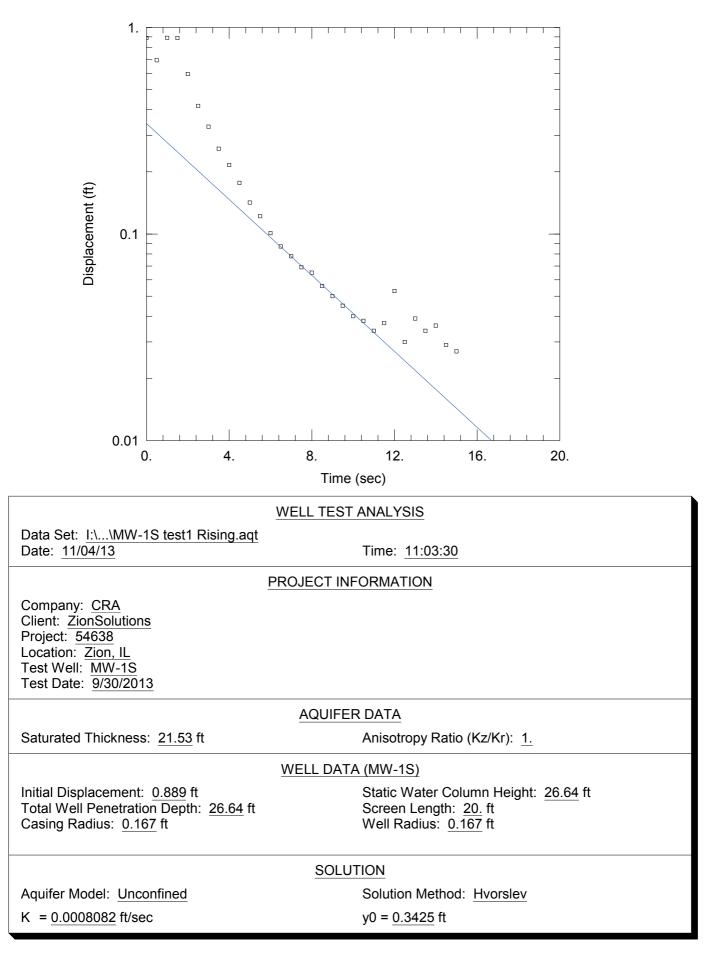


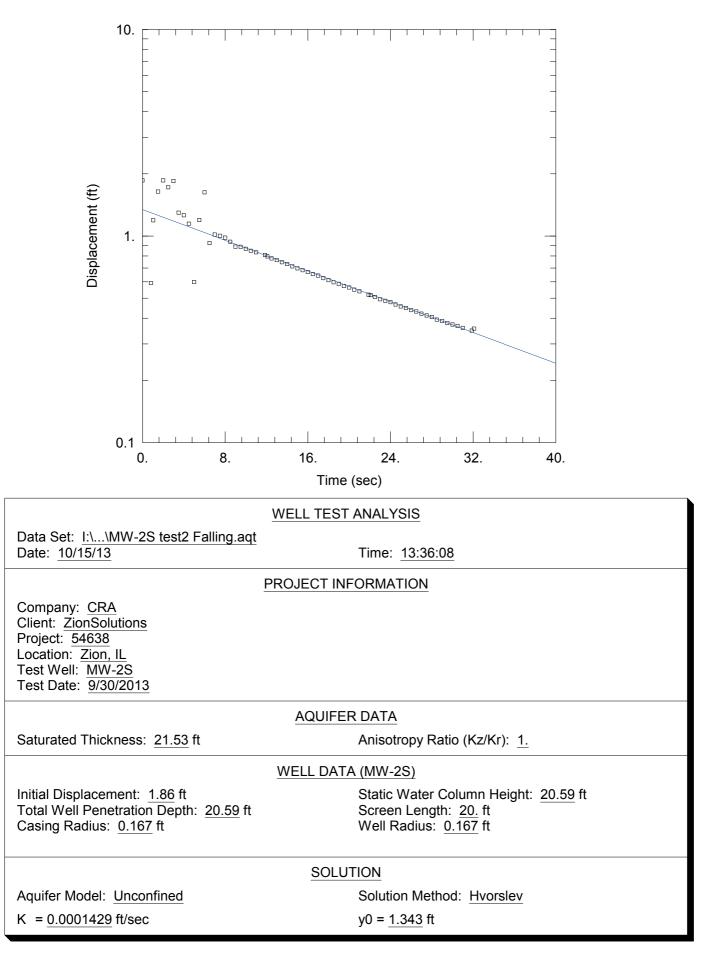
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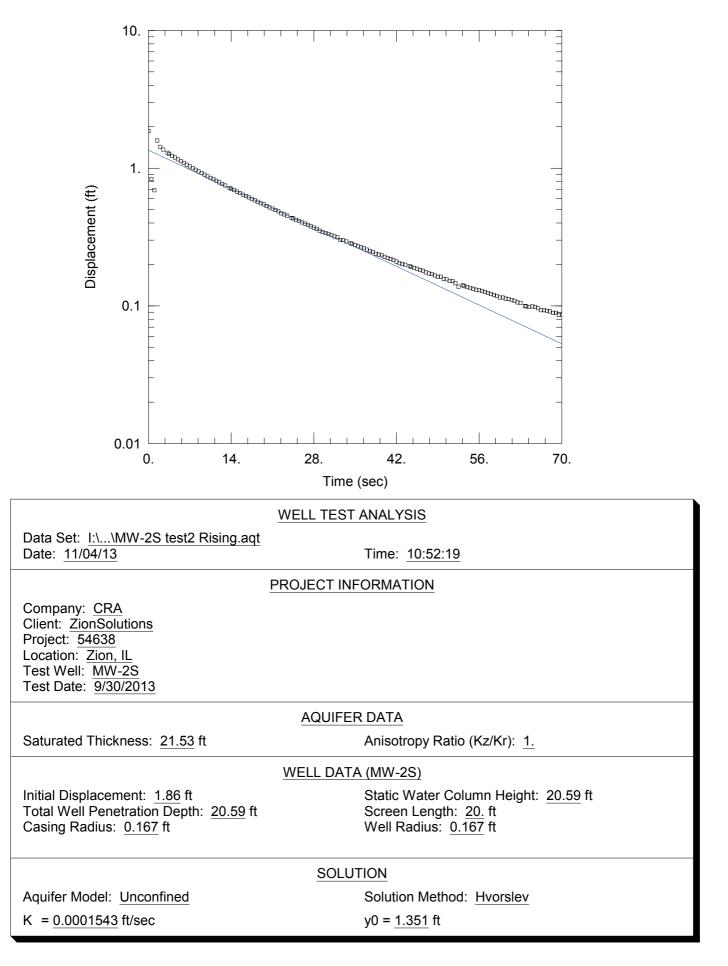
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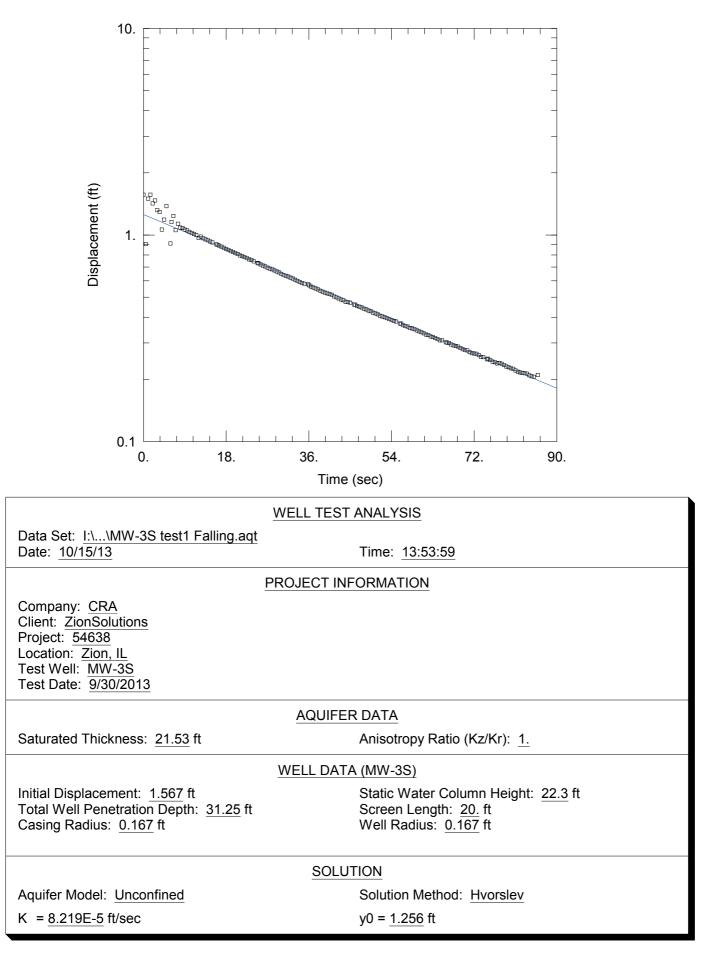
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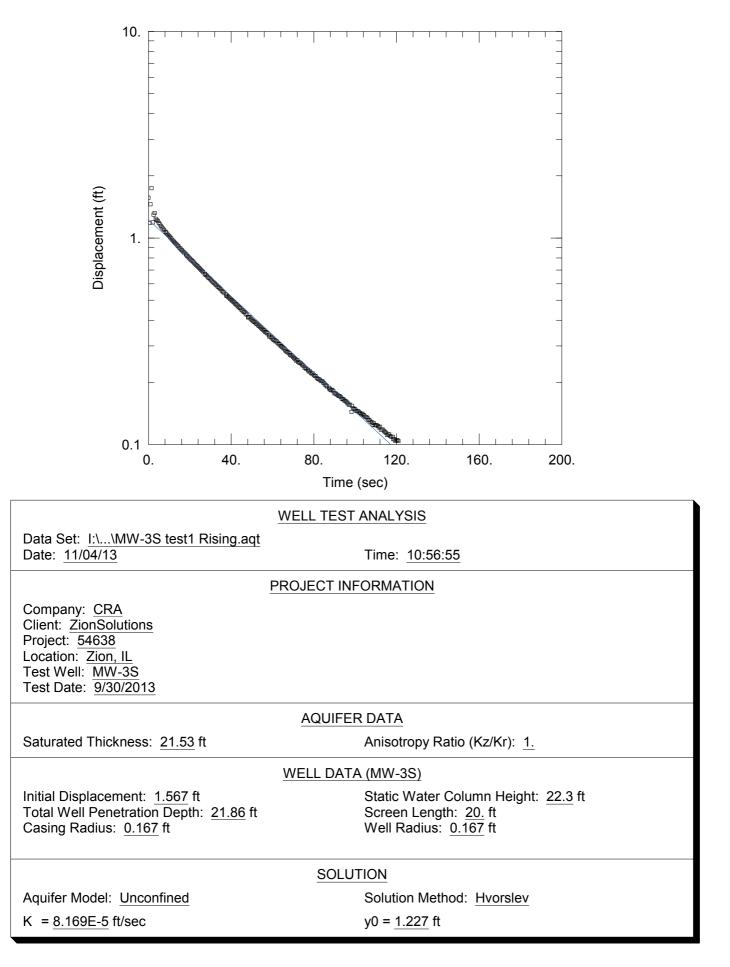


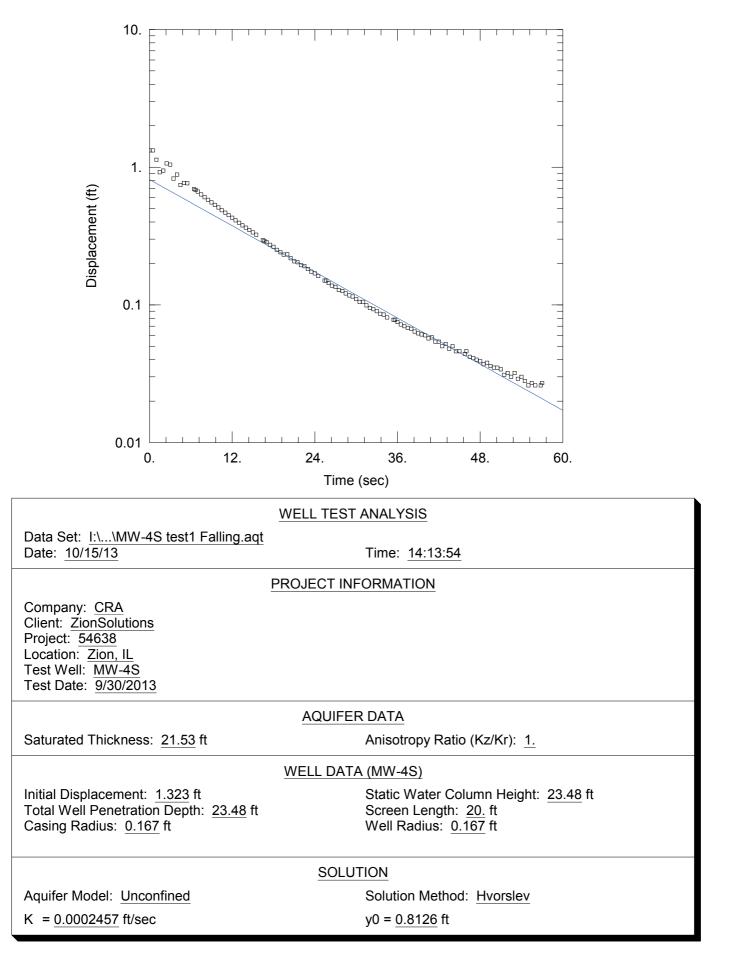


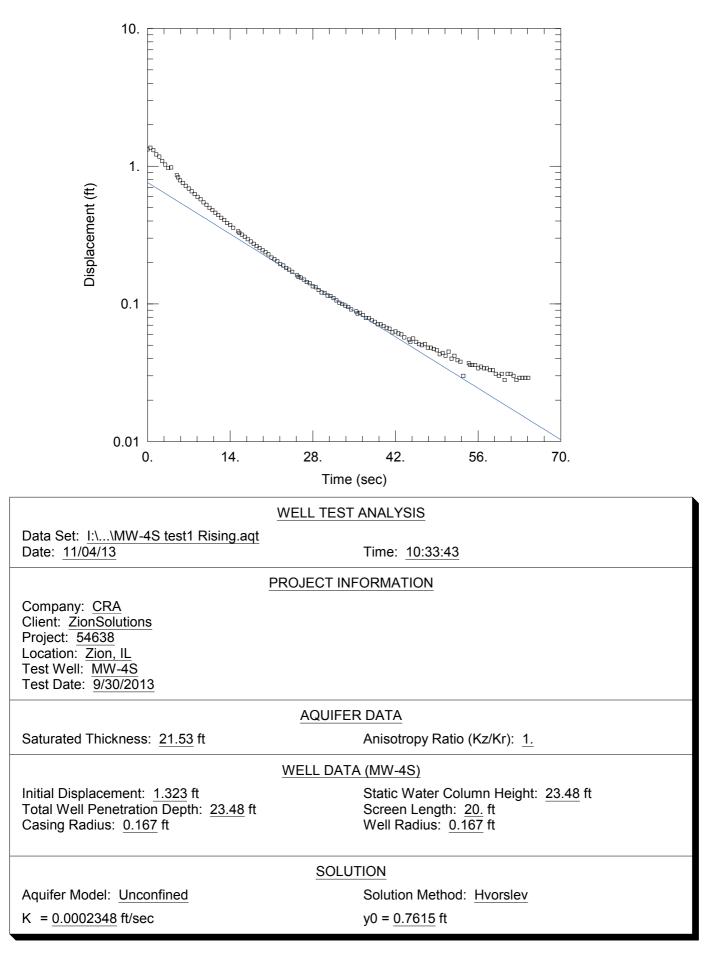


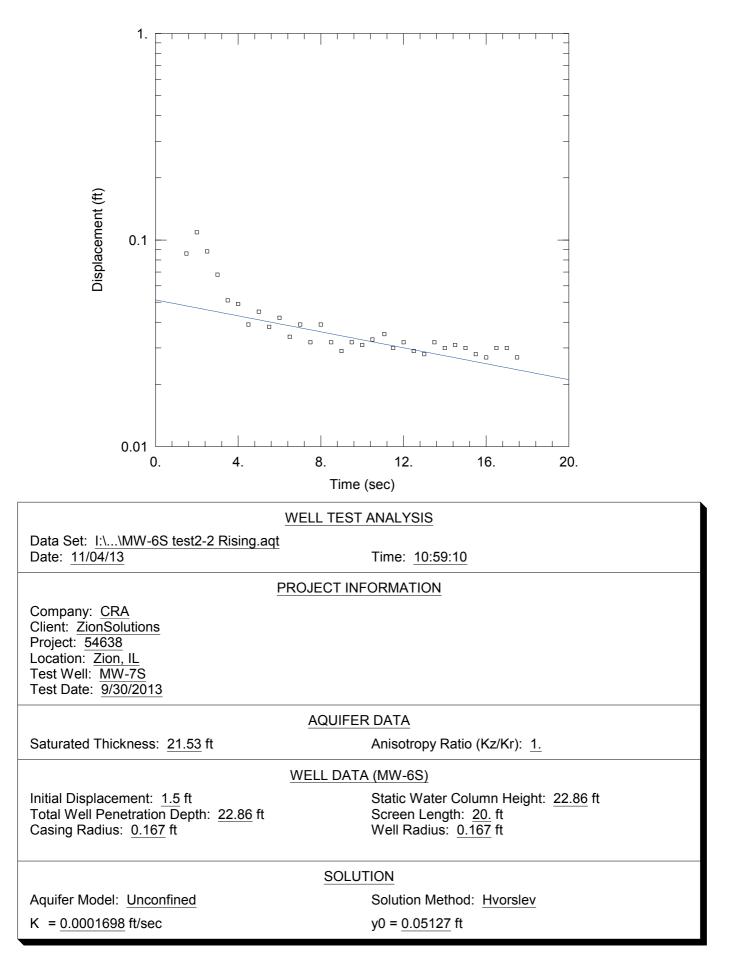


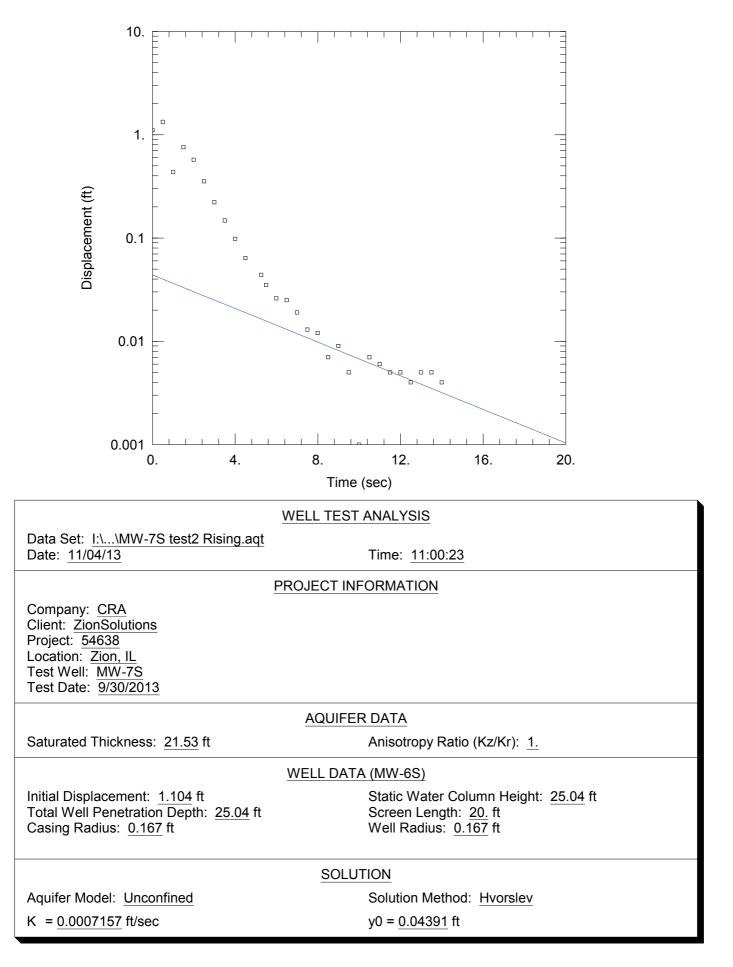


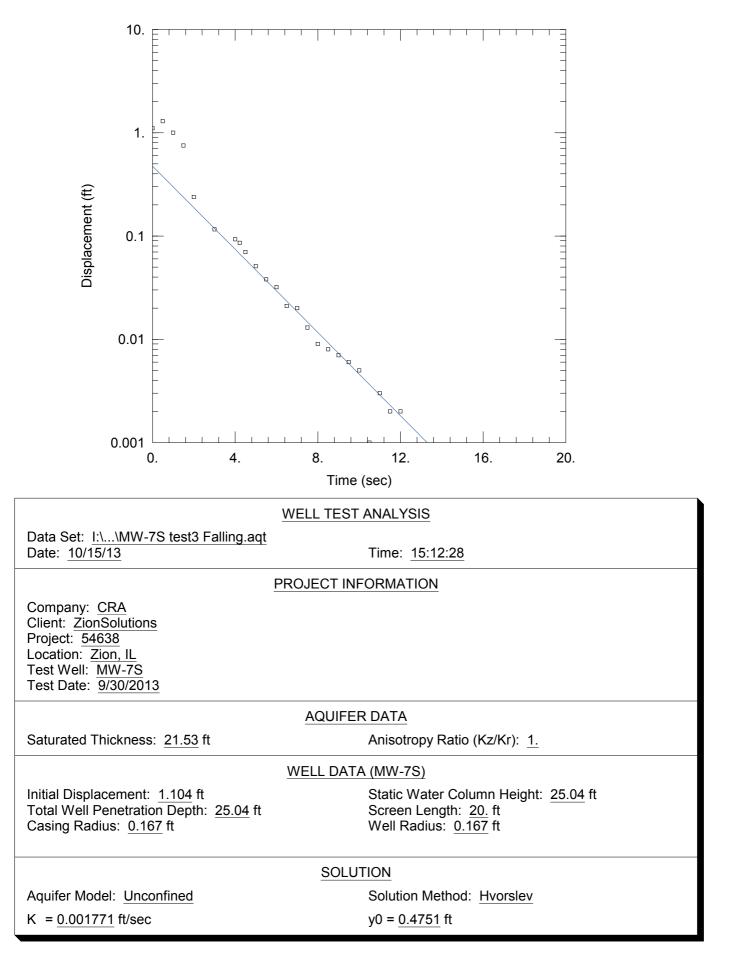












TSD 14-006 Revision 5

Appendix D

September 30, 2013 Geotechnical Subsurface Investigation Letter Report (dated November 15, 2013)



8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631-3501 Telephone: (773) 380-9933 Fax: (773) 380-6421 www.CRAworld.com

November 15, 2013

Reference No. 054638-21

DRAFT

Mr. Robert Decker ZionSolutions, LLC 101 Shiloh Blvd Zion, IL 60099

Dear Mr. Decker:

Re: September 30, 2013 Geotechnical Subsurface Investigation Zion Nuclear Power Station Decommissioning Project

Conestoga-Rovers & Associates (CRA) was retained by ZionSolutions, LLC (ZionSolutions) for hydrogeology consulting services related to the decommissioning of the Zion Nuclear Power Station in Zion, Lake County, Illinois (Site). On September 30, 2013, CRA completed a subsurface geotechnical investigation at the Site. The purpose of the investigation was to collect soil samples for laboratory analysis in an effort to determine Site-specific values for the following geotechnical parameters: bulk density, hydraulic conductivity, porosity, and field capacity.

The subsurface investigation included the advancement of three soil borings in the vicinity of existing monitoring wells on the eastern and western portions of the Site. Figure 1 presents the locations of the three soil borings. The soil boring identifier and the approximate location of each soil boring is described in the following table:

Table 1 – Boring identifiers and approximate locations							
Soil Boring Identifier Easting Northing Narrative Location							
GT2-MW-01s	343,798	641,834	Approximately 5 feet north of MW-01s				
GT2-MW-02s	343,789	641,782	Approximately 5 feet north of MW-02s				
GT2-MW-06s	343,287	641,724	Approximately 7 feet north of MW-06s				

Drilling services were provided by Testing Services Corporation (TSC) of Carol Stream, Illinois using a drill rig equipped with 4.25-inch inside diameter hollow stem augers. Samples were collected at select intervals using Shelby tubes when possible. Samples that could not be contained within the Shelby tubes were collected as bagged samples and remolded by the laboratory. Soil samples were also collected for field capacity analysis. The borings were logged by a CRA geologist. The boring logs are provided in Attachment 1.

A total of seven soil samples from the three soil boring locations were selected for geotechnical analysis to confirm the results of prior analyses at the east side of the Site and to acquire geotechnical data from the west side of the Site. The pre-determined soil sample depths were intended to target the following stratigraphic units at the Site:

- Fill Sand Sand which originated as natural beach sand excavated during the construction of the facility in the early 1970s and then was returned to the excavation as fill material.
- Native Sand Beach sand which was not disturbed by construction activities at the facility.

	Table 2 – Selection of samples for analysis								
Soil Boring Identifier Identifier		Sample Identifier	Target Stratigraphic Unit						
GT2-MW-01s	2-5	GT2-MW-01S-5	fill sand (vadose zone)						
	16-20	GT2-MW-01S-20	fill sand (saturated zone)						
	24-28	GT2-MW-01S-28	native sand (saturated zone)						
GT2-MW-02s	2-5	GT2-MW-02S-5	fill sand (vadose zone)						
	12-26	GT2-MW-02S-26	fill sand (saturated zone)						
GT2-MW-06s	2-5	GT2-MW-06S-5	native sand (vadose zone)						
	16-20	GT2-MW-06S-20	native sand (saturated zone)						

The following soil samples were selected for laboratory analysis:

The samples were screened for radiological contamination in accordance with ZionSolutions' standard operating procedures prior to hand delivery to TSC's laboratory in Carol Stream. Soil samples were shipped to Agvise Laboratory (Agvise) in Northwood, North Dakota via overnight courier.

<u>Results</u>

The laboratory reports are provided as Attachment 2. Hydraulic conductivity, porosity, and bulk density values were determined by TSC. Field capacity values were determined by Agvise.

The following presents an overview of the results compared to literature values.

Hydraulic Conductivity

The hydraulic conductivity for sand is expected to be between 3E-04 to 3E-03 centimeters per second (cm/s) or 1E+02 and 1E+05 meters per year (m/y) based upon the Argonne National Laboratory (ANL) Data Collection Handbook (Yu, et al., 1993). The geometric mean of the laboratory results is 1.73E+03 m/y, which falls within the expected range. The laboratory results are summarized in Table 3 below.

¹ bgs – below ground surface

Soil Porosity

The Illinois Tiered Approach to Corrective Action Objectives (TACO) default value for the total porosity of sand is 32% by volume. Fetter (Fetter, 1994) lists a range of 25 to 50% for well sorted sand or gravel. The arithmetic mean of the laboratory porosity values is 35.3%, which falls within the range of literature values.

Bulk Density

The Illinois TACO default value for the dry bulk density of sand is 1.8 kg/L or 112.4 pounds per cubic foot (pcf). The arithmetic mean of the laboratory bulk density values is 1.82 g/cm^3 (113.6 pcf), which is similar to the literature value.

Table 3 – Hydraulic conductivity, bulk density, and porosity								
Soil Boring Identifier	Sample Identifier	Hydraulic Conductivity (cm/s)	Hydraulic Conductivity (m/y)	Porosity (%)	Bulk Density (pcf)			
GT2-MW-01S	GT2-MW-01S-5	5.36E-03	1.69E+03	33.2	112.6			
GT2-MW-01S	GT2-MW-01S-20	3.94E-03	1.24E+03	29.7	118			
GT2-MW-01S	GT2-MW-01S-28	3.13E-02	9.88E+03	31.6	115.3			
GT2-MW-02S	GT2-MW-02S-5	1.26E-03	3.98E+02	33.4	118.4			
GT2-MW-02S	GT2-MW-02S-26	1.96E-03	6.19E+02	36.9	112.5			
GT2-MW-06S	GT2-MW-06S-5	1.04E-02	3.28E+03	39.3	102.2			
GT2-MW-06S	GT2-MW-06S-20	8.77E-03	2.77E+03	42.7	116.2			
Arithm	ietic mean			35.3	113.6			
Geome	etric mean	5.48E-03	1.73E+03					

Soil Water Retention Curves and Field Capacity

Field capacity is defined as the ratio of the volume of water retained in the soil sample, after all downward gravity drainage has ceased, to the total volume of the sample. For most soils, the field capacity corresponds to a negative pressure of 0.1 bar (sand), 0.2 bar (silty clay loam), or 0.3 bar (loam) (Klocke & Hergert, 1990). Laboratory measurements of field capacity typically use a negative pressure of 1/3 bar (Nachabe, 1998). A volumetric water content greater than the field capacity is not available for plant use because it drains away quickly. The wilting point is the maximum pressure that a plant can exert to overcome the tension of the water adhering to the soil. The wilting point corresponds to a negative pressure of 15 bars.

Typical field capacity values range from 2.8% to 3.9%¹ for sand and loamy sand, respectively (USDA Natural Resources Conservation Service, 2008). The arithmetic mean of the laboratory values for field capacity is 2.7% by volume. Soil water retention curves were developed using the water content under negative pressures of 0-15 bar. The soil water retention curves are included in Attachment 3.

Table 4 – Field Capacity						
Soil Boring	Sample Identifier	Field Capa	city (%)			
Identifier		0.1 bar	1/3 bar			
GT2-MW-01S	GT2-MW-01S-5	10.4	4.7			
GT2-MW-01S	GT2-MW-01S-20	3.6	1.2			
GT2-MW-01S	GT2-MW-01S-28	6.5	2.5			
GT2-MW-02S	GT2-MW-02S-5	10.3	4.1			
GT2-MW-02S	GT2-MW-02S-26	8.9	3.8			
GT2-MW-06S	GT2-MW-06S-5	3.9	1.8			
GT2-MW-06S	GT2-MW-06S-20	2.9	1.0			
	Arithmetic mean	6.64	2.73			

<u>References</u>

Fetter, C. (1994). Applied Hydrogeology, 3rd Edition. New York: Macmillan.

- Klocke, N. L., & Hergert, G. W. (1990). G90-964 How Soil Holds Water. *Historical Materials from University of Nebraska-Lincoln Extension*. University of Nebraska-Lincoln.
- Nachabe, M. H. (1998, August). Refining the Definition of Field Capacity in the Literature. *Journal of Irrigation and Drainage Engineering*, 124(4). American Society of Civil Engineers.
- USDA Natural Resources Conservation Service. (2008, June). Soil Quality Indicators.
- Yu, C., Loureiro, C., Cheng, J. J., Jones, L. G., Wang, Y. Y., Chia, Y. P., & Faillace, E. (1993, April). Data Collection Handbook to Support Modeling Impacts of Radioactive Material in Soil. Argonne, Illinois: Argonne National Laboratory.

¹ 1 to 1.4 inches of water per foot of soil assuming a soil porosity of $30\% (1/(12\times3)=2.8\% \text{ or } 1.4/(12\times3)=3.9\%)$.

If you have any questions or comment, please feel free to contact me by email (<u>dsoutter@craworld.com</u>) or telephone (773-380-9933).

Yours truly,

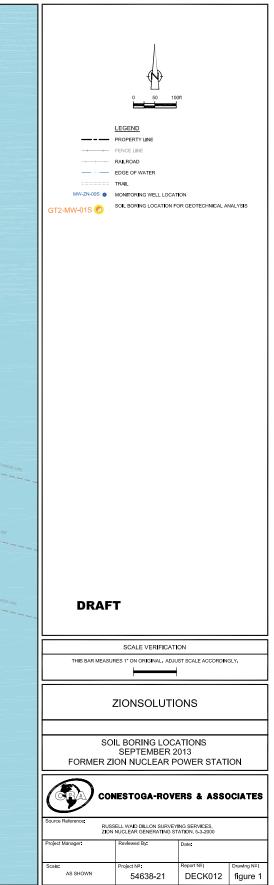
CONESTOGA-ROVERS & ASSOCIATES

Douglas G. Soutter

DS/ko/12 Encl.

cc: Phil Harvey, CRA





54638-21(DECK012)GN-CO001 NOV 13/201

ATTACHMENT 1

BORING LOGS

	STRATIGRAPHIC AND I				Page	e 1 of 1
PROJE CLIENT LOCATI	CT NAME: Zion Solutions Facility CT NUMBER: 054638 C Zion Solutions ION: Zion, Illinois	DATE C DRILLIN	HOLE DESIGNATION: GT2-MW-01S DATE COMPLETED: September 30, 2013 DRILLING METHOD: 41/4" ID HSA FIELD PERSONNEL: K. White			
DRILLIN	NG CONTRACTOR: TSC	DRILLE	R: Francisco			
DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	DEPTH ft BGS	BOREHOLE		MPLE	
				NUMBER INTERVAL	'N' VALUE	
- - - - - - - - - - - - - - - - - - -	SP SAND, some gravel, few stones about 1 inch in diameter, fine to medium grained sand, brown, moist			1SS ST	10 12	
- 6 	Blind drilled	6.00		255	27	
12						
14 16	SP SAND, with gravel, trace silt, loose to compact, fine to medium grained sand, brown, wet	14.00	Z N Z N	14-16'	2	
- - 				ST 1.2	2	
20				20-22'		
22 				22-24'		
24 2 2	- increase in gravel, grayish brown at 24.0ft BGS			24-26'		
26	- stone about 2 inches in diameter at 27.0ft BGS			26-28'		
	- gray at 27.5ft BGS END OF BOREHOLE @ 28.0ft BGS	28.00				
	NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; F	REFER TO (CURRENT ELEVATION TABLE			
	GRAIN SIZE /	ANALYSIS				

	STRATIGRAPHIC AND	INSTRU RBURDE			Page 1 of 1
PROJE	CT NAME: Zion Solutions Facility	HOLE [DESIGNATION: GT2-MW	-02S	
PROJE	CT NUMBER: 054638	DATE (COMPLETED: September 30,	2013	
CLIENT	: Zion Solutions	DRILLI	NG METHOD: 41/4" ID HSA		
LOCATI	ION: Zion, Illinois	FIELD I	PERSONNEL: K. White		
DRILLIN	NG CONTRACTOR: TSC	DRILLE	R: Francisco		
DEPTH	STRATIGRAPHIC DESCRIPTION & REMARKS	DEPTH	BOREHOLE	SAMPL	.E
ft BGS		ft BGS	DOREHOLL	(ff) (AL	Щ.
				NUMBER INTERVAL REC (ft)	'N' VALUE
_	FILL, gravel	0.20		199	
-	SP SAND, trace gravel, loose to compact, fine to medium grained sand, brown			1SS 0-2'	13
2					
				ST 2.0	
-4					
				255	12
-6				4-8'	
-				$\square \times \square$	
	Blind drill	8.00			
-					
- 10					
-			Soil Cuttings		
		12.00			
	SW SAND, some gravel, compact, fine to medium grained sand, brown, wet			3SS 12-14'	14
				12-14	
- 14				ST 0.8	
F 10	 	••••		ST 0.8	
16 	• • • •	* * * • * • •			
-	- some clay from 17.0 to 17.5ft BGS	••••		16-19'	
18 	- some clay, with gravel from 18.0 to 18.5ft	°. °. °. °. °. °. °. °. °. °. °. °. °. °			
-					
20	SM SILT and SAND, trace gravel and clay,	20.00		18-22'	
	loose, fine grained sand, gray/brown, wet	영상 왕성			
22	END OF BOREHOLE @ 22.0ft BGS	22.00			
Ł					
-24					
F					
26					
28					
5 					
=F					
∑ — 32 					
-					
	NOTES: MEASURING POINT ELEVATIONS MAY CHANGE	; REFER TO	CURRENT ELEVATION TABLE		
5	GRAIN SIZE	E ANALYSIS			

	STRATIGRAPHIC AND	INSTRU BURDE			Page 1 of 1
PROJE	CT NAME: Zion Solutions Facility	HOLE [DESIGNATION: GT2-MW	-06S	
PROJE	CT NUMBER: 054638	DATE C	COMPLETED: September 30,	2013	
CLIENT	: Zion Solutions	DRILLI	NG METHOD: 4¼" ID HSA		
LOCAT	ION: Zion, Illinois	FIELD F	PERSONNEL: K. White		
DRILLI	NG CONTRACTOR: TSC		R: Francisco	0.14	
DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	DEPTH ft BGS	BOREHOLE	SAMI	
				NUMBER INTERVAL REC (ft)	'N' VALUE
				NUN RE	> .z
_	SM SAND, with silt, trace gravel, loose, fine grained sand, brown, dry			1 <u>SS</u> 0-2' 1.7	
-2				1.7 0-2'	24
				ST	27
-4	- fine to coarse grained sand at 4.0ft BGS	이는 아직			
-				2SS 4-6'	10
6	Blind drilled	6.00		4-0	
-	Blind drilled				
-8					
-					
- 10					
- 12					
_			Soil Cuttings		
	SP SAND, gravelly, some silt, coarse grained	14.00			
-	sand, brown, wet	0		3SS 14-16	54
16 					
_ 18	α. 				
_ 10		실			
) O			
		\cap			
				20-23'	
-		0			
		d			
-				23-26'	
26	END OF BOREHOLE @ 26.0ft BGS	26.00			
28					
11					
30 					
Слоти 					
┙Ĺ					
	NOTES: MEASURING POINT ELEVATIONS MAY CHANGE	REFER TO	CURRENT ELEVATION TABLE		
	GRAIN SIZE	ANALYSIS			
	510 111 0122				

ATTACHMENT 2

GEOTECHNICAL LABORATORY REPORTS

TSD 14-006 Revision 5

TSC



- CLIENT: Conestoga Rovers & Associates 8615 W. Bryn Mawr Ave. Chicago, IL 60631
- PROJECT: L-80,843 Exploratory Soil Borings Zion Solutions Zion, Illinois

Boring Location	Sample Number	Depth (Feet)	Soil Type	MC %	Density (Bulk) pcf	Specific Gravity (Est)	Porosity (N)	Hydraulic Conductivity cm/sec
GT 2 MW-01S	1	5	SM	4.8	112.6	2.7	33.2	5.36 x 10 ⁻³
GT 2 MW-01S	2	20	SP	10.9	118.0	2.7	29.7	3.94 10 ⁻³
GT 2 MW-01S	3	28	SP - SM	13.7	115.3	2.7	31.6	3.13 x 10 ⁻²
GT 2 MW-02S	1	5	SP - SM	5.5	118.4	2.7	33.4	1.26 x 10 ⁻³
GT 2 MW-02S	2	26	SP - SM	5.8	112.5	2.7	36.9	1.96 x 10⁻³
GT 2 MW-06S	1	5	SM	4.3	102.2	2.7	39.3	1.04 x 10 ⁻²
GT 2 MW-06S	2	20	SP - SM	20.6	116.2	2.7	42.7	8.77 x 10 ⁻³

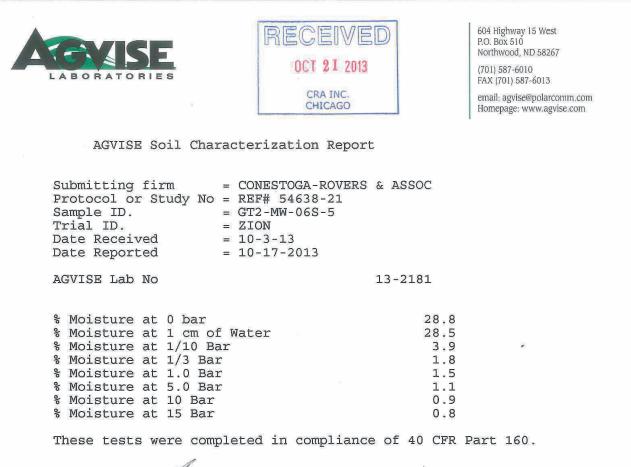
SOIL TESTING SUMMARY

MC Moisture Content

Est Estimated Specific Gravity

N Porosity

AGVISE



Larry Wikoff"/ Analytical Investigator



604 Highway 15 West P.O. Box 510 Northwood, ND 58267

(701) 587-6010 FAX (701) 587-6013

email: agvise@polarcomm.com Homepage: www.agvise.com

AGVISE Soil Characterization Report

= CONESTOGA-ROVERS & ASSOC Submitting firm Protocol or Study No = REF# 54638-21 Sample ID. = GT2-MW-06S-20 = ZION = 10-3-13 Trial ID. Date Received Date Reported = 10 - 17 - 2013

AGVISE Lab No

13-2182

olo	Moisture	at	0 bar	24.1
00	Moisture	at	1 cm of Water	23.8
00	Moisture	at	1/10 Bar	2.9
olo	Moisture	at	1/3 Bar	1.0
oto	Moisture	at	1.0 Bar	0.7
olo	Moisture	at	5.0 Bar	0.6
olo	Moisture	at	10 Bar	0.5
olo	Moisture	at	15 Bar	0.5

These tests were completed in compliance of 40 CFR Part 160.

Larry Wikoff Analytical Investigator

10/18/13

Date



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(701) 587-6010 FAX (701) 587-6013

email: agvise@polarcomm.com Homepage: www.agvise.com

AGVISE Soil Characterization Report

Submitting firm= CONESTOGA-ROVERS & ASSOCProtocol or Study No= REF# 54638-21Sample ID.= GT2-MW-01S-5Trial ID.= ZIONDate Received= 10-3-13Date Reported= 10-17-2013

AGVISE Lab No

13-2183

4.7
2.6
0.4
4.7
3.5
2.0
2.1
2.0
2.

These tests were completed in compliance of 40 CFR Part 160.

Larry Wikoff

Analytical Investigator

10/18/13

Date

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(701) 587-6010 FAX (701) 587-6013

email: agvise@polarcomm.com Homepage: www.agvise.com

AGVISE Soil Characterization Report

Submitting firm= CONESTOGA-ROVERS & ASSOCProtocol or Study No= REF# 54638-21Sample ID.= GT2-MW-01S-20Trial ID.= ZIONDate Received= 10-3-13Date Reported= 10-17-2013

AGVISE Lab No

13-2184

00	Moisture	at	0 bar	25.0
olo	Moisture	at	1 cm of Water	23.5
olo	Moisture	at	1/10 Bar	3.6
00	Moisture	at	1/3 Bar	1.2
olo	Moisture	at	1.0 Bar	0.8
olo	Moisture	at	5.0 Bar	0.6
olo	Moisture	at	10 Bar	0.5
olo	Moisture	at	15 Bar	0.5

These tests were completed in compliance of 40 CFR Part 160.

Larry Wikoff U Analytical Investigator

10/18/13

Date



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email: agvise@polarcomm.com Homepage: www.agvise.com

AGVISE Soil Characterization Report

Submitting firm = CONESTOGA-ROVERS & ASSOC Protocol or Study No = REF# 54638-21 Sample ID.= GT2-MW-01S-28Trial ID.= ZIONDate Received= 10-3-13Date Reported= 10-17-2013

AGVISE Lab No

13-2185

010	Moisture	at	0 bar	24.8
olo	Moisture	at	1 cm of Water	24.4
00	Moisture	at	1/10 Bar	6.5
00	Moisture	at	1/3 Bar	2.5
00	Moisture	at	1.0 Bar	1.7
00	Moisture	at	5.0 Bar	1.1
00	Moisture	at	10 Bar	0.9
00	Moisture	at	15 Bar	0.8

These tests were completed in compliance of 40 CFR Part 160.

h Larry Wikoff

Analytical Investigator

10/18/13 Date

LABORATORIES

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email: agvise@polarcomm.com Homepage: www.agvise.com

AGVISE Soil Characterization Report

Submitting firm Date Received Date Reported

= CONESTOGA-ROVERS & ASSOC Protocol or Study No = REF# 54638-21 Sample ID.= GT2-MW-02S-5Trial ID.= ZIONDate Received= 10-3-13 = 10-18-2013

AGVISE Lab No

13-2186

24.7 24.0 10.3 4.1 2.7 1.8 1.5 1.5

olo	Moisture	at	0 bar
010	Moisture	at	1 cm of Water
olo	Moisture	at	1/10 Bar
olo	Moisture	at	1/3 Bar
olo	Moisture	at	1.0 Bar
00	Moisture	at	5.0 Bar
00	Moisture	at	10 Bar
010	Moisture	at	15 Bar

These tests were completed in compliance of 40 CFR Part 160.

11

Larry Wikoff Analytical Investigator

10/18/13 Date



604 Highway 15 West P.O. Box 510 Northwood, ND 58267

(701) 587-6010 FAX (701) 587-6013

email: agvise@polarcomm.com Homepage: www.agvise.com

AGVISE Soil Characterization Report

Submitting firm= CONESTOGA-ROVERS & ASSOCProtocol or Study No= REF# 54638-21Sample ID.= GT2-MW-02S-26Trial ID.= ZIONDate Received= 10-3-13Date Reported= 10-18-2013

AGVISE Lab No

13-2187

	Moisture			24.4
0	Moisture	at	1 cm of Water	23.2
00	Moisture	at	1/10 Bar	8.9
ofo	Moisture	at	1/3 Bar	3.8
00	Moisture	at	1.0 Bar	2.5
olo	Moisture	at	5.0 Bar	1.7
010	Moisture	at	10 Bar	1.4
olo	Moisture	at	15 Bar	1.4

These tests were completed in compliance of 40 CFR Part 160.

on/ Larry Wikof

Analytical Investigator

10/18/13

Date

METHOD SUMMARY FOR SOIL ANALYSIS

TESTING LABORATORY:

AGVISE LABORATORIES, INC. P.O. Box 510; 604 Highway 15 West Northwood, ND 58267-0510 (701) 587-6010

The following is a summary of analytical methods used by AGVISE Laboratories, Inc. in the determination of soil characteristics and nutrient content. Analytical data of some or all of these analytical methods are presented based upon the testing requested by the firm submitting the soil specimens.

Chemical Properties

Carbonates - Determined by gravimetric loss of Carbon Dioxide (NUT.02.14).

<u>Cation Exchange Capacity</u> – Determined by summing cations and hydrogen (NUT.02.03). The cations of Magnesium, Potassium, Calcium, and Sodium are determined by extraction with 1.0 N Ammonium Acetate (NUT.02.12) or (NUT.02.93). Hydrogen is determined by measuring the pH of the soil in Adams-Evans Buffer Solution (NUT.02.11).

<u>Free Iron Oxide in Soil</u> – Determined by measuring Sodium Citrate/Sodium Bicarbonate/Sodium dithionate extractable Fe (NUT.02.106).

<u>Nitrogen, % Total</u> – Determined by the Kjeldahl method (NUT.02.15) or Combustion Method (NUT.02.107).

<u>Nitrogen, Nitrate and/or Nitrite</u> – Determined using an autoanalyzer with Cadmium Reduction (NUT.02.101).

Nitrogen, Ammoniacal – Determined by the Steam Distillation method (NUT.02.47).

<u>Organic Carbon %</u> - Determined by the Walkley-Black procedure (NUT.02.20) or by Combustion using an Elementar Carbon Analyzer (NUT.02.107).

<u>Organic Matter %</u> - Determined by the Walkley-Black procedure (NUT.02.09) or by the Loss of Weight on Ignition procedure (NUT.02.04).

<u>pH</u> – Determined with a pH electrode in a 1:1 soil: water suspension (NUT.02.05). Alternative procedures include: pH in a 1:1 soil: 1 N KCl suspension (NUT.02.55), pH in a 1:2 soil: 0.01M CaCl₂ suspension (NUT.02.80), pH in a 1:1 soil: 0.01M CaCl₂ suspension (NUT.02.98), or pH in a saturated paste (NUT.02.39).

<u>Phosphorus</u> – Determined by the Olsen method (NUT.02.07). Alternative procedure includes determination by the Bray method (NUT.02.52).

<u>Silver, Total</u> – Determined by ICP analysis (NUT.02.114) of an acid digestion following EPA Method 3050B (NUT.02.102).

Microbial

Soil Microbial Biomass – Determined by the fumigation extraction method (MIC.02.01).

Soil Microbial Count - Determined by the plate count method (MIC.02.03).

Soil and Sediment Anaerobic Microbial Count - Determined by the anaerobic plate count method (MIC.02.06).

Soil Biomass by Solvita - Determined by measuring the CO2 produced during the Haney-Brinton Method Solvita Test (MIC.02.07).

All of the above methods are detailed in the current analytical SOPs used by AGVISE Laboratories, Inc. Characterization testing laboratory.

NUT.05.01 - Long Term Storage of Soil and Water Characterization Specimens: According to this SOP, soil characterization samples will be retained by AGVISE Laboratories. Inc. for at least two years before disposal and water characterization samples will be retained for a period of 60 days before disposal.

ADM.05.01 - Archivist Duties and Archiving Procedures: This SOP states that copies of soil and water characterization reports, original COC's, original raw data and hard copies generated by computer will be archived within 60 days after the signature by the Analytical Investigator. Supplemental data will be archived annually.

QAU.08.01 - Quality Assurance Inspections of Facilities, Studies, and Processes for GLP **Compliance:** Method inspections will be performed on a regular basis at AGVISE Laboratories, Inc. For soil characterization, two methods will be inspected per month and one water characterization inspection will be conducted per month. An annual facility audit will be performed by AGVISE Laboratories, Inc. Quality Assurance Unit.

All of the above methods are detailed in the current analytical SOP's used in AGVISE Laboratories, Inc. Characterization laboratory.

APPROVED BY ANALYTICAL INVESTIGATOR:

Date

Larry Wikoff, Analytical Investigator

COPY OF ORIGINAL AGVISE Laboratories, Inc. Initial FW Date/0-16-13

CONESI OG 8615 8615 Chio	CONESTOGA-ROVERS & ASSOCIATES 8615 W. Bryn Mawr Avenue Chicago, Illinois 60631 (773)380-9933 phone	SHIPPED TO (Laboratory Name): A	Agvise	362	4 Highery 1 5. Bax 510 NO	5 cuest 58267
(173	(773)380-6421 fax	REFERENCE NUMBER:			ME:	
CHAI	CHAIN-OF-CUSTODY RECORD			1010		
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TSD 14-006 Revision 5

ATTACHMENT 3

SOIL WATER RETENTION CURVES

