(8,000 PCi/1) is about one chance in 3 million per reactor year for the Schuylkill and less than one chance in a billion per year for the Delaware (Ref. 3, p. 19; see Second PID p. 258). If the source term revisions discussed in paragraph 15 are considered, the probability that the 90sr thirty day PAG would be exceeded in the Schuylkill could be as low as one chance in a hundred million per year (factor of 5) or less than one chance in a billion per year (factor of 10 or more). It is estimated that the isotopes of iodine might be significant contributors to the dose (330 mrem in one month) which constitutes PEMA's PAG. The calculation of the rate at which iodine, deposited on a watershed, leaches into the river is discussed in paragraph 10. Using the model described there, there would be a chance of about one chance in 100,000 per reactor year that the PEMA short-term PAGs for 1311 (3000 pCi/1) might be exceeded in the Schuylkill River, and about one chance in 150,000 per reactor year that they might be exceeded in the Delaware River. These probabilities are the same as the upper bound probabilities given in the previous written testimony (Ref. 3, p. 19) and on page 258 of the Second PID even though the calculation given there assumed that the fraction of the deposited iodine that would enter the drinking water source in the short term would be 50 times that of the strontium (i.e., close)

DR ADOCK 05000352

16