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Via E-Mail and U.S. Mail

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Mr. Steve Tarlton, Radiation Program Manager
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246

Re: Comments of Parker Water & Sanitation District on CDPHE Proposed Guidance to Lower Generic Dose Limits for TENORM

Dear Mr. Tarlton:

This letter provides comments on behalf of Parker Water & Sanitation District ("PWSD") on the proposed revisions to the February 2007 "Interim Policy and Guidance Pending Rulemaking for Control and Disposition of Technologically Enhanced Naturally Occurring Radioactive Material ("TENORM"), Rev. 2.1" (the "Guidance"), as summarized by the "TENORM Policy and Guidance, Revision 2013, draft overview of 10/1/2013" ("Draft Revision").

PWSD provides water supplies and wastewater services for residents in Douglas County, including the Town of Parker and Town of Lonetree. Currently, the primary water source for PWSD is groundwater. Parker Water and Sanitation District water facilities include thirty-seven deep wells, eight alluvial wells, and five water storage tanks. PWSD has completed the construction of Rueter-Hess Reservoir, a reservoir with storage capacity of 72,000 acre feet which will allow PWSD and other water supply partners to shift toward renewable surface water supplies. Additionally, PWSD is completing construction of a new 1-MGD water treatment plant which will use state-of-the-art ceramic filters to produce high quality drinking water.

For wastewater, PWSD operates two tertiary (advanced) wastewater treatment plants which produce effluent that meets state requirements, including the ultra-low phosphorus effluent limit of 0.05 μg/l. The treated water, after mixing and storage in regional reservoir, is released to Cherry Creek. Because PWSD customers are primarily residential and related commercial, there are no industrial sources of anthropogenic radioactive materials to their water and wastewater systems. Any de minimis radioactive particles are from naturally occurring background sources.

Biosolids from PWSD's treatment facilities meet the criteria for land application; the biosolids are transported and applied by Parker Ag. Services to agricultural lands in Eastern Colorado.

PWSD neither generates nor receives TENORM in concentrations of concern under the current Guidance. Moreover, to the extent that any technologies implemented by PWSD were to enhance TENORM, such technologies for water and wastewater treatments are specifically required, and approved, by Colorado Department of Public Health and Environment ("CDPHE"). CDPHE cannot, on one hand, require treatment, and by another agency complain that the required treatment has side effects which now must be regulated.

Summary of PWSD Comments

As has been expressed by numerous parties at the public meetings for the Draft Revision, there is no demonstrated need for a proposal to lower the generic dose limit (from 100 mrem/yr to 25 mrem/yr). CDPHE has not conducted a risk or exposure analysis, no public or private group requested the modification to the guidance, no study has been conducted to demonstrate the costs and benefits of the proposal, and there is no information from CDPHE on the quantifiable decreased risk of exposure. Environmental requirements are not driven by a "less must be better" approach, there must be a demonstrated regulatory need in order to require new compliance protocols. Instead of conducting the necessary research and studies to demonstrate the need for the Draft Revision, CDPHE has asked the stakeholders to submit information. In other words, CDPHE has proposed a solution and is asking the impacted regulatory community to demonstrate the problems to justify regulation.

The Draft Revision also shifts the Guidance from a material specific approach to a media specific approach. In so doing CDPHE would cast a much broader net over the currently regulated community, and potentially regulated community, to capture every source of TENORM. The potential costs are staggering, but again, CDPHE has done nothing to demonstrate the need for change in approach.

Finally, this is a clear attempt to regulate through guidance. CDPHE is well aware that it cannot issue regulations more stringent than federal standards. See C.R.S. §§ 25-11-104(b) and 24-4-103. There is no federal standard in this instance, merely a suggestion from EPA and the NRC that a lower generic dose standard is appropriate. CDPHE's attempt to side-step this prohibition fails, as the Draft Revision is a clear attempt to regulate through guidance. Federal guidelines are not intended to, and do not, become regulatory limits in the operational permits of the Colorado regulated community. The Draft Revision would change that, effectively making the drastically reduced generic dose limit a permit cap on most facilities.

No Demonstration of Need for Reduction in Generic Dose Limit

It is now the widely accepted protocol that new environmental policy and regulation will be driven by sound science, supporting cost-benefit analyses, and a demonstrated need for the change. If it was ever acceptable, the environmental regulatory community long ago abandoned the "less must be better" approach to environmental regulation in favor of scientifically demonstrated risk reduction and cost benefit analyses to support the increased costs of regulation. The increased costs of compliance are always passed on the to the end user or tax payer, so the premise is that the additional regulatory cost burden must have a demonstrated benefit.

In this case, CDPHE has not even attempted to demonstrate that the benefits outweigh the costs. Instead of conducting a risk analysis, CDPHE generally states that lower levels of exposure are better. CDPHE is perhaps attempting to rely on the "as low as is reasonably achievable" (ALARA) approach to reducing the generic dose limit, but has not shown, or even attempted to show, that the proposed 25 mrem/yr limit is reasonable or achievable.

The bottom line is that CDPHE has no scientific studies to support a purported need for the reduction in the generic dose limit. If implemented, the generic dose limit could be prohibitively expensive to implement, difficult or impossible to achieve, and therefore not reasonable. CDPHE needs to scrap this unsupported, sub rosa attempt to regulate TENORM.

No Demonstration of Need to Shift to Media Specific Approach

The clear intent of the Draft Revision is to cast a wider regulatory net by shifting the Guidance from a material specific approach to a media specific approach. As with the reduction in the generic dose limit, CDPHE has not provided scientific data to justify this shift in policy. The apparent proposition is that regulating on a media specific basis will do a more thorough job of reducing exposure, and will therefore be better.

CDPHE does not have the resources to take this media specific approach, and basically admitted as much at the public meetings. Shifting the focus from industries with known material specific handling and disposal requirements to a disperse focus on any potential TENORM media will overwhelm the various regulatory agencies. TENORM, as the name itself makes clear, is naturally occurring radioactive material, contained in virtually every material that comes from the earth. Changing to a media specific approach could potentially require massive amounts of new sampling and monitoring to "prove the negative" for currently regulated and potentially regulated entities.

The much more effective approach would be to continue to focus on the industries where known TENORM materials are handled and disposed.

No Legal Authority to Regulate

As many parties at the public meetings have pointed out, this is a clear attempt to regulate through guidance. The Draft Revision uses language of mandatory compliance, more similar to a regulation than a policy document. CDPHE itself makes clear that these standards are expected to be incorporated into facility permits by divisions of the agency, including for example the Water Quality Control Division.

CDPHE cannot issue regulations more stringent than federal standards. See C.R.S. §§ 25-11-104(b) and 24-4-103. The Draft Revision recites in detail that there is no federal standard in this instance, merely a suggestion from EPA and the NRC that a lower generic dose standard is appropriate. The regulation, camouflaged as guidance, is therefore illegal.

Additional General Comments

By its own terms, TENORM is naturally occurring material, yet nothing in the guidance recognizes background quantities, or would allow reduction for source contamination. Issues may occur at the source, well outside of PWSD's control. The Draft Revision could potentially require PWSD to clean up background waters to levels that are significantly below currently adopted standards.

The Draft Revision also provides a significant disincentive for land application of beneficial use of wastes. The Draft Revision proposes to require new post application characterization and periodic monitoring, instead of the current sampling prior to application. These new standards may make beneficial uses cost prohibitive and therefore obsolete. Any policy changes should avoid a shift to wholesale landfilling of TENORM.

Conclusion

With so little information on why this policy is necessary or how it will be implemented, it is impossible to provide any more information to CDPHE at this time. PWSD respectfully requests that CDPHE reconsider this approach and simply stick with the current Guidance.

Respectfully Submitted,

COUNSEL FOR PARKER WATER & SANITATION DISTRICT

Ronda Sandquist
Adam DeVoe
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cc: Ron Redd, District Manager, Parker Water & Sanitation District
James Roche, Utilities Director, Parker Water & Sanitation District

THE COLORADO WASTEWATER UTILITY COUNCIL

COLORADO WATER UTILITY COUNCIL
Rocky Mountain Section of AWWA

January 13, 2014

Via Email and U.S. Mail
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And steve.tarlton@state.co.us

Mr. Steve Tarlton, Radiation Program Manager
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Hazardous Materials and Waste Management Division
3400 Cherry Creek Drive South
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Dear Mr. Tarlton,

This letter provides comments from the Colorado Wastewater Utility Council and the Colorado Water Utility Council (Councils). The Councils are comprised of municipal and quasi-municipal entities that provide water and wastewater treatment services to the citizens of Colorado. The Councils, through their members, are funded by rate payers. It is our mission to protect public health and the environment, while being good stewards of the financial resources entrusted to us. We appreciate the opportunity to comment on the Colorado Department of Public Health and Environment's (CDPHE) proposed changes presented in the TENORM Policy and Guidance Draft Revisions (Draft).

Existing Guidance

The Councils strongly encourage the Division to answer the regulatory questions raised during the stakeholder process regarding the existing Interim Policy and Guidance Pending Rulemaking for Control and Disposition of Technologically Enhanced Naturally Occurring Radioactive Materials in Colorado, Rev. 2.1, Final Draft for Comment (Guidance) prior to continuation of additional meetings through the stakeholder workgroup process. The questions that have been raised include the following:

- Conflict within the Radiation Control Act regarding the regulation of radioactive materials and the regulation of naturally occurring radioactive materials, which is prohibited until EPA promulgates rules for the disposal of naturally occurring radioactive materials.
- Concern over the Guidance having been and continuing to be used as a *de facto* regulation in place of initiating a rulemaking process in accordance with the Administrative Procedures Act.
- Issues raised in items 1, 4, and 9 by Metro Wastewater Reclamation District in their letter dated December 11, 2013.

We request CDPHE respond expeditiously and in writing to concerns regarding the guidance as a *de facto* rule, the regulatory authority to control TENORM, and coordination with the 'Suggested State Regulations for Control of Radiation' issued by the Conference of Radiation Control Program Directors. We do not share the view that the only alternative to this version of the Guidance is the requirement of radioactive materials licenses for TENORM.

Furthermore, the Councils note that the current Guidance has been applied inconsistently among utilities. Those wishing to build new drinking water treatment plants must address residual management and TENORM concentrations, again through policy (Design Criteria for Potable Water Systems), but no mechanism is employed by which existing water treatment plants are required to adhere to the Guidance. On the other hand, utilities which voluntarily comply with the Guidance are drawn into yet another workgroup process while others are not complying. Some utilities are incurring large costs and lengthy delays waiting on approvals to dispose of Tier 3 residuals, while others are allowed to land apply material with the same concentrations without use restrictions. Clarification of the regulatory questions above may resolve these inconsistencies. The absence of a clear and defensible interpretation of the regulations increases concerns regarding liability, misuse of public funds, and inhibition of the beneficial reuse of biosolids.

The Councils believe these issues should be resolved prior to further expenditures and efforts via the workgroup process.

As Low as Reasonably Achievable (ALARA) Dose

The Councils recommend revisiting the basis and components of the 25 mrem/yr dose limit. ANSI N13.12-1999 states "Relevant U.S. radiation regulations provide criteria for limiting radiation dose to the public to annual doses from about 40 μSv to 1 mSv/y (4 mrem/y to 100 mrem/y) although there are specific instances that are both above and below this range. The primary guidance for radiation doses to the general population is 1 mSv/y (100 mrem/y), based on the guidance of the NCRP and the regulations of the NRC". The Guidance also provides a 100 mrem/yr limit for the sum of all doses to the individual (Total Effective Dose Equivalent or TEDE), excluding radon, background, and medical sources.

ANSI N13.12-1999 states that the NRC allows for doses above 25 mrem/yr when "meeting the 0.25 mSv (25 mrem) limit would result in net public or environmental harm, or would be technically impracticable or prohibitively expensive. Such alternative standards would have to be shown to be ALARA". The Guidance says "The As Low as Reasonably Achievable (ALARA) concept is also applied to reduce the potential dose as far below the limit as is feasible, economic, social, and logistical concerns taken into account."

Disposal Options

The Councils have requested information from their members regarding the disposition of residuals, and approximately 35% of respondents discharge water treatment plant residuals to the sanitary sewer. A cost benefit analysis should be conducted to determine the aggregate costs and benefits to the State of Colorado for the alternative TENORM disposal methods. However, there does not appear to be a statewide dataset that allows for analysis of disposal costs or the determination of environmental impact. This information must be collected and considered to comply with ALARA. In the long run, Colorado must address the absence of disposal sites in state that will accept TENORM with concentrations above the tier limits in the existing Guidance. The Councils request a discussion about amending the landfill tier concentration limits to make them more realistic using a pragmatic dose assessment, including a discussion about how variances may be obtained to these tier limits without great effort and expense.

Indoor Radon

In the Guidance, indoor radon is not included in the 100 mrem/yr TEDE. However, the RESRAD scenarios presented at the December workgroup include indoor radon, which comprises the vast majority of the dose. The inclusion of indoor radon is a major change in the Guidance; however it is not mentioned in the Draft. Since indoor radon constitutes such a large component of the effective dose, the impact of this change is significant, and requires further consideration. In addition, we recommend a subgroup work on the dose modeling to ensure the parameters reflect realistic scenarios.

The SSRCR's rationale section for Part N of the TENORM model state regulations (Attachment 1) explains why indoor radon inhalation is excluded from Part N.5.c, the dose assessment of the TEDE. The rationale says that there are many factors such as construction methods that make it nearly impossible to accurately predict radon levels. It says that transfer of TENORM should be done in accordance with EPA's indoor radon guidance. This can be done with "the adherence to building codes." "As such, implementation of the Agency's radon program should provide adequate protection of the public from indoor radon." In other words, compliance with building codes for new buildings and with EPA's guidance is likely to address indoor radon so it is not necessary to include indoor radon in the TEDE. The Implementation Guide for the SSRCR model TENORM regulations (Attachment 2) says essentially the same thing.

Most local jurisdictions in Colorado who regulate buildings use the International Building Code and the International Residential Code as models for their local building codes. Both Codes (residential and commercial) require a perimeter foundation drain with gravel or crushed stone that provide a preferential pathway for radon to be diverted away from the interior of the building (see IBC 1805.4.2 and IRC R405.1 in Attachments 3 and 4, respectively). This is one example of how compliance with one provision of the Codes would act as an incidental passive radon mitigation system (see schematic in Attachment 5.) Moreover, buyers of homes inspect homes and indoor radon tests are routine elements of those inspections. If inspections find elevated radon levels, radon mitigation systems are typically installed consistent with EPA guidance. CDPHE should follow the SSRCR model code to exclude indoor radon from its dose assessments and from its Guidance.

The Implementation Guide discusses the variables to use in the dose assessment and encourages the use of realistic site-specific parameters to avoid overestimating doses. It notes that the RESRAD model has limited options for customizing the assessment. This is another reason to not use the default indoor radon dose modeled by RESRAD. The Councils note the vast differences between the SSRCR's approach to dose assessment and CDPHE's approach to dose assessment as demonstrated by the dose assessment distributed at the December 11 stakeholder meeting. The Councils encourage CDPHE to use realistic parameters and make pragmatic risk management decisions, like the SSRCR does. This should be addressed in a dose assessment sub-work group.

Dilution

The Councils recommend that the Guidance differentiate between incidental dilution and purposeful dilution, and specify which forms of purposeful dilution are acceptable. The Draft notes that dilution of higher-activity materials with clean material in not an acceptable path to achieving disposal levels. However, dilution has been allowed and is occurring when water plant residuals are being discharged to the sanitary sewer and subsequently mixed with wastewater and treated by Wastewater Treatment Facilities. Interestingly, this practice is suggested and encouraged in the Guidance. In addition, the long time practice of tilling biosolids into soil could also be considered a method of dilution, for POTWs who accept TENORM materials, because it effectively dilutes any TENORM which may be present. These examples may be forms of incidental dilution, not purposeful dilution. If the revisions were to prohibit this form of incidental dilution in the future, it may inhibit the ability of those POTW's to beneficially use their biosolids. The Councils believe that both incidental and purposeful dilution may be very cost effective ways to achieve safe concentrations of TENORM.

The model SSRCR regulations N.8.c and N.9 distinguish between purposeful dilution to meet criteria for exemption from TENORM disposal requirements and incidental dilution from normal product processing. Incidental dilution is not prohibited. Purposeful dilution is prohibited unless the regulating agency approves it. Some examples listed in the SSRCR for Agency-approved purposeful dilution include TENORM as an ingredient in asphalt, contaminated soil as a soil amendment, and treated sludge as material to melt snow on roadways (SSRCR N.8.c). We request further discussion of dilution as a method to achieving lower disposal levels, the types of activities that CDPHE considers to be incidental dilution (which should not be prohibited by the Guidance), and which forms of purposeful dilution that CDPHE will approve in advance.

Other Changes to the Guidance

The Councils appreciate the desire to simplify the Guidance, but are concerned that some changes will make the Guidance more difficult. The guidance needs to provide adequate detail to understand and use the document.

Changing from a material specific to a media specific approach may be problematic. Given a dose based approach, the distribution coefficients, food transfer factors, and emanation rates of radon (if included) are material specific. These factors may vary by orders of magnitude.

In addition, the manner of reuse or disposal of the material directly affects the dose. Biosolids that are applied to cropland and tilled to a depth of 6 inches are diluted by a factor of approximately 500. However, biosolids may be surface applied to rangeland, or applied to reclamation sites at higher rates.

The testing and analysis requirements should be clearly defined. The Solid Waste and (previously) Biosolids regulations have used a screening tool of 40 pci/gm gross alpha, which is a much less expensive analysis than speciation of radionuclides. The Councils recommend the Division include the ability for utilities with TENORM material to conduct gross alpha screening or some other appropriate screening mechanism of biosolids/residuals rather than straight speciation to achieve the goal in a cost effective manner. The Councils also recommend minimal or no testing/screening requirements for utilities that do not accept sewer disposal of water treatment plant residuals, as they have already addressed this issue in another mechanism.

Conclusion

Colorado has a long history of protecting our environment. The Councils wish to facilitate the development of clearly defined and beneficial environmental regulations. TENORM is a complex issue which requires knowledge of health based risk assessments, radiochemistry, environmental fate and transport, drinking water production, oil and gas production, and wastewater treatment, etc. The Councils recommend the regulatory questions be answered first, prior to dedicating large amounts of resources to the rest of the workgroup process. Thank you for the opportunity to provide comments.

Respectfully Submitted by:

Martha Hahn, Chair
Colorado Wastewater Utility Council

Lisa Voytko, Chair
Colorado Water Utility Council

2004
RATIONALE FOR REVISIONS

PART N
REGULATION AND LICENSING OF TECHNOLOGICALLY ENHANCED NATURALLY OCCURRING RADIOACTIVE MATERIAL (TENORM)

Introduction

The following are reasons for changes made to the April 1999 version of Part N:

Specific Provisions

Sec. N.1 - Purpose.

Changes clarify the activities for which radiation standards or licensing criteria have been established by Part N.

Sec. N.2 - Scope.

N.2a. The minor editorial change is for clarification that some TENORM is excluded, such as the TENORM that is exempt.

N.2b. and N.2c. The order of these two sections was swapped. Because "Beneficial attribute" and "Beneficial to the product" had the same meaning, the first term was replaced by the second in the text. The "and/or its" words were deleted from N.2b. because the item being covered is covered well in N.2c. The words "neither the TENORM, nor" were deleted because Part N addresses radiation hazards.

N.2d. Here and elsewhere specific references to the Atomic Energy Act (AEA) definitions of source material and byproduct material were used because the NORM radionuclides for which NRC retains exclusive jurisdiction are defined by the terms used in SR-N's revised language rather than by radionuclide. Work is being done that may change the concentrations at which these materials are regulated by the NRC and Agreement States.

N.2e. The reference to location of transportation requirements has been moved here from N.4e. because the requirements are not exemptions.

Sec. N.3 - Definitions.

The term "Beneficial attribute" has been deleted because the identically defined term "Beneficial to the product" is now used throughout to be clearer.

The term "Conditional release" has been defined because it was used in N.7.

The term "Consumer" has been defined to clarify requirements in N.10, N.20, and N.22.

The term "Consumer or retail product" has been defined because it has been used in several sections including N.10, N.20, and N.22. The definition is a slight modification of the definition in the Consumer Product Safety Act (15 USC Section 2052).

The term "Critical group" has been defined as it is used in N.7b.

The terms "General environment" and "Institutional controls" are not used in the text so these terms have been deleted.

The definition for "Product" had a word that is not the generally accepted term of art for the affected industries so it was replaced with the generally accepted word -- "beneficiated."

The term "Residual radioactivity" has been defined as it is used in N.7. The definition was taken from 10 CFR 20.1003.

The definition of "Technologically Enhanced Naturally Occurring Radioactive Material (TENORM)" including the pre-1978 tailings of waste produced by the extraction or concentration of uranium or thorium has been modified to match the language used in N.2d. See the comment for N.2d. above for the reason.

A footnote was added to address the EPA's concern regarding the definition of TENORM.

The definition of "Transfer" was revised for clarity.

<u>Sec. N.4 - Exemptions.</u>

N.4 formatting was revised.

N.4a. Minor editorial changes were made for clarification. The last sentence was moved to N.8e. because it is a prohibition rather than an exemption. Disposal is not the only issue here because dilution could be done to become or remain exempt. NOTE: SR-N also introduced a section, N.9, to address the prohibition. A footnote has been added to clarify that the concentration of TENORM may not be averaged over the weight of the contaminated article. The word "own" was deleted because ownership is addressed in Part C. The last sentence was clarified to indicate that consumer or retail products having greater than 5 pCi/g of radium are subject to specific licensing.

N.4b. Because the reference is to TENORM distributed in accordance with N.20a. and such TENORM is only regulated by Part N, "these regulations" has been changed to "this Part" for clarity.

N.4c. The word "fertilizer" was preceded by "phosphate or potash ore-based" to distinguish phosphate or potash fertilizers from organic-based fertilizers.

N.4d. The optional exemption for zircon, zirconia and zircon products was added after evaluation of information submitted demonstrated that the dose criteria specified in N.4f. would not be exceeded. The zircon exemption was added as a new N.4d.

N.4d. through N.4f. were relettered due to the insertion of the new N.4d.

N.4e. To be consistent the words have been spelled for the acronym CERCLA as was done for RCRA. The statutory references for the two federal statutes have been added as a user friendly item for persons desiring the information.

N.4e. The transportation provision has been moved to N.2e. because it is not an exemption. Transportation of TENORM is covered by the same regulations as all other radioactive material.

N.4f. The criterion upon which exemptions from Part N are to be based has been added.

N.4g. A section was added to address land spreading of water treatment plant and sewage treatment plant liquid or sludge.

A footnote was added for clarification in response to U.S. EPA's comments.

Sec. N.5 - Standards for Radiation Protection for Members of the Public.

The title has been changed for clarity because radiation protection for workers is addressed in N.6.

N.5a. This provision includes standards for radiation protection for TENORM that are consistent with Part D. N.5a. refers to controlling exposure to the general public from activities licensed or registered by the Agency. For clarity minor editorial changes were made to include words used in the referenced sections.

N.5b. For clarity the words were changed to correspond with the title of Part D.

N.5c. The dose from inhalation of radon and its short half-life decay products is excluded from the dose to members of the public, except when the dose is due to effluent releases from licensed operations from handling or processing TENORM. For licensed facilities that cause the release of radon from materials being processed the impact on the public is controlled by the effluent release criteria of Part D, and the dose from the released radon should be included in dose to workers.

N.5c. The standards for radiation protection exclude doses from indoor radon and its progeny. Radon, a radioactive gas, can accumulate to elevated levels inside buildings. Isotopes of radon are formed by the decay of uranium and thorium. There are many factors such as construction methods that make it nearly impossible to accurately predict the level of radon expected from a given concentration of uranium or thorium in soils or building materials. SR-N recommends that use, transfer or disposal of TENORM be done in such a manner to be consistent with EPA/HHS 1994 indoor radon guidance. This may be achieved by institutional controls or the adherence to building codes. As such, implementation of the Agency's radon program should provide adequate protection of the public from indoor radon.

Sections N.5b. and N.5c. have been revised to clarify that the TEDE dose from radon and its short half-life progeny for effluent emissions from licensed sites is included based on Part D, but that the indoor inhalation dose from diffusion of radon from subsurface residual radium is excluded from calculations of the TEDE dose.

N.5d.of 1999 has been deleted, due to revisions in N.5b. and N.5c.

Sec. N.6 - Protection of Workers During Operations.

Words have been changed for clarification.

Sec. N.7 - Unrestricted Use and Conditional Release.

The title has been changed to reflect changes in what is now covered by this section and the section has been rewritten. The section has been rephrased to state what can be done rather than what cannot. New subsections have been added to clarify criteria for transfer, unrestricted use and conditional release.

To be consistent with N.4 and for clarity "^{226}Ra or ^{228}Ra" has been changed to "^{226}Ra and ^{228}Ra". A provision was added to cover TENORM other than ^{226}Ra or ^{228}Ra and its associated progeny. The 25 millirem/y criterion for the average member of the critical group is added to apply when ^{226}Ra or ^{228}Ra is not present.

N.7b. A footnote was added, in response to U.S. EPA comments.

N.7e. A new footnote denoties the emphasis of CERCLA policies on permanent solutions is added to N.7e. A limit has been added for application to results from environmental pathways dose assessments to ensure the engineering design of sites, when remediation is performed, and the assumptions used in the dose assessment modeling meet the longevity requirements of Part D (equivalent to 10 CFR 20 and corresponding to the requirements of the EPA for radioactivity with similar characteristics).

N.7f. The screening criterion, which is for conditional release, has been rephrased to clearly state that such release is for metal recycle only. This eliminates the apparent contradiction with the concentration criterion. Also, SR-N is specifically stating a 50 microroentgen per hour screening level in an effort to encourage uniformity of this level nationwide. Specification in this manner eliminates arguments regarding what the true value of background was for each measurement.

Sec. N.8 - Disposal and Transfer of Waste for Disposal.

N.8a. Several words have been changed for purposes of clarity.

These options include, but are not limited to, disposal at sites licensed by the Nuclear Regulatory Commission or Agreement States and also provide the option for disposal of waste at sites that have been permitted for receipt and disposal of appropriate waste by other applicable regulatory agencies. Part N is not intended to foreclose the option of transferring TENORM waste to regulated waste disposal facilities, including RCRA-permitted solid waste disposal facilities. N.8a.iii. clarifies acceptance and disposal of TENORM waste is conditioned on the absence of express prohibition, e.g., by the disposal facility's operating permit, and must not be contrary to applicable federal and state law governing the type of TENORM waste to be disposed.

For example; WCS (Waste Control Specialists), in Texas, does not have a license for disposal of radioactive waste or TENORM, but under the Texas regulatory structure, it has permits for disposal of NORM exempt from the Texas NORM regulations (30 pCi/g of radium). Also, there are two sites in California with permits for disposal of geothermal NORM waste. The SR-N group does not wish the Part N rules to restrict these permitted options.

N.8a.iv. Provides the option for disposal in injection wells approved by applicable government authority, without Agency action.

N.8a.v. In N.8a.v. changes have been made to clarify that use of a disposal site is appropriately a function of the permitting agency for that disposal site not another Agency issuing the license to use the TENORM. This change eliminates potential conflicts with existing regulatory structure in some states. It also increases the options likely to be available to TENORM licensees.

N8a.vi. In response to U.S.EPA comments, N.8a.iii. is reinstated in this section.

N.8b. This is the N.8d. of the 1999 Part N.

N.8c. This section was added to prohibit dilution for the purpose of making waste exempt, without regulatory approval. A footnote was added giving examples of approved uses.

<u>Sec. N.9 - Prohibition.</u>

This section has been added to clarify that dilution is not allowed to be used to avoid regulation by an Agency. This section applies to materials that are not waste, because waste is covered by a similar provision in N.8c. A footnote was added explaining that normal product processing is not considered purposeful dilution.

<u>Sec. N.10 - General License.</u>

N.10a. Words were added to clarify that a specific license and a general license are mutually exclusive for the same TENORM. A footnote was added concerning ownership.

N.10b. The words "consumer or retail" have been added to clarify that a general license is required for industrial products manufacturing but a specific license is required to manufacture consumer or retail products.

N.10c. Minor editing has been done for clarification.

N.10d. Minor editing has been done for clarification. A time limit for the notification has been added. A footnote was added indicating Agency options.

N.10e. The title was revised for clarity to include the item covered by the provisions that was not previously indicated in the title. The order of the subsections has been changed for clarity.

N.10e.i. Clarifications were made. A footnote was added for notification of local governments.

N.10e.ii. Minor editing has been performed to change to a clear positive requirement rather than a negative statement.

N.10e.iii. This section was formerly N.10e.iv.

N.10e.iv. . This provision has been rewritten to clarify that the prior approval must be in writing to transfer property and equipment in a manner other than the same person for the same purpose or there is an ownership/possession of property change. The criteria used to grant approval has been added. A record keeping provision has been added that conforms to decommissioning record keeping requirements. Another option has been added to the optional methods for documentation.

N.10f. Words were changed to allow more flexibility. A footnote was added to identify options for providing notification of recipients.

N.10g. A phrase has been added to clarify that radiation exposure concerns are the basis for an Agency to require a general licensee to apply for a license and become a specific licensee. This should be a rare event. An example of such would be some Florida facilities that have already been specifically licensed because of concerns for personnel exposures.

<u>Sec. N.20 - Specific Licenses.</u>

N.20 Editorial rephrasing has been done for clarity. We tried to eliminate some of the confusion caused by use of "unless", "except" and "not."

N.20a. The words "consumer or retail" have been added to clarify the type of manufacturing and distribution operations that require a specific license rather than a general license.

N.20b. Editorial rephrasing was done for clarity.

N.20c. Added storage and treatment to cover other waste management practices.

<u>Sec. N.21 - Filing Application for Specific License.</u>

N.21a. Words were added to require an application for a license to be in English.

N.21b. The word "expiration" was changed to "termination" to conform to regulatory practice. This change also has been made in other appropriate sections of the rule.

<u>Sec. N.22 - Requirements for the Issuance of Specific Licenses.</u>

A footnote has been added for clarity.

N.22a.v. The legally correct term has been used by changing "surety" to "assurance".

N.22a.vii. Because the land owner is or can be ultimately held liable for contamination existing on the property, this provision has been added. It may reduce potential liability for the licensing Agency.

N.22c. The words "consumer or retail" have been added to clarify the type of manufacturing and distribution operations that require a specific license rather than a general license. Defining "consumer or retail product" also indicated the need to delete "material or" where it was used with "product" for clarity.

N.22c.iii.(4) The word "radionuclides" replaced "TENORM" to clarify that solubility analysis will be for each form of each element.

N.22c.iii.(6) The word "material" has been replaced with "TENORM", because that is the material we are concerned with and want to keep isolated.

N.22c.iii.(14) The term "processing" seemed clearer than "production" before "production lots."

N.23. The words "consumer and retail" were added as adjectives for "products" for clarity to match new defined terms.

<u>Sec. N.24 - Table of Doses.</u>

N.24 The word "Organ" has been deleted because the doses are not all organ doses.

<u>Sec.'s N.25 through N.40</u> These generic sections of licensing are found in Part C and basically applied to all kinds of licensees. An Agency may choose to reference appropriate sections of Part C rather than repeat them. The Agency should carefully review the recommended changes included in Part N before deciding to reference Part C provisions. The sections have been placed in Part N so that Part N can stand alone for most of the affected licensees.

N.26a.i., ii., iii. and iv. The word "specific" or "specifically" has been added for clarity.

N.26a.iv. N.5 has been added to the referenced sections to provide a comprehensive list of applicable sections.

N.26a.v. Editorial changes have been made for clarification and accuracy in reference to the definition of "entity".

N.26a.vi. and vii. These are updated requirements from N.32 (equivalent to NRC's License Termination Rulemaking).

N.26a.viii. The temporary jobsite provision from Part C has been modified to cover the lack of jurisdiction under the Atomic Energy Act of 1954, as amended.

<u>Sec. N.27 - Expiration and Termination of Specific Licenses.</u>

This section has been rewritten to more clearly indicate the distinction between expiration and termination of a license. It also more clearly indicates the licensees continuing responsibility for licensed material when a license has expired but has not been terminated by the Agency. Radiation monitoring reporting requirements are more clearly specified. Procedural requirements are more detailed for clarity.

Sec. N.31 - Modification and Revocation of Specific Licenses.

Minor editorial changes have been made for clarity.

Sec. N.32 - Record Keeping Requirements for Site Reclamation.

These are updated requirements from (equivalent to NRC's License Termination Rulemaking).

Sec. N.40 - Reciprocal Recognition of Specific Licenses.

The section has been revised to make it more user friendly and for clarity.

N.40b. This provision has been added to advise licensees who have been licensed under a less restrictive set of conditions that conditions or limitations can be imposed by the Agency with authority to grant the reciprocal recognition.

Sec. N.50 - Financial Surety Arrangements.

In the title and N.50a., the term "financial surety arrangements" has been revised to the technically correct term "financial assurance arrangements."

Matters for Future Consideration

1. TENORM Definition In letters dated April 2001 and May 3, 2002, the U.S. Environmental Protection Agency (EPA) recommended that the National Academy of Sciences (NAS) TENORM definition be adopted in Part N to address those circumstances where exposure risk to TENORM is increased without radionuclide concentration increasing. The NAS definition of TENORM is very broad, and could include trivial situations, such as plowing a field, or the use of granite in countertops. The SR-N Committee believes that the definition of TENORM proposed in this model rule will meet the needs of most States, as well as, address the major portions of the TENORM problems. The Committee agrees with EPA's comments that the definition will not address all situations, such as the potential TENORM problems associated with waste rock or drill cuttings. In those few situations, the individual state may wish to consider altering the model rule to address its specific TENORM problems. With the additional experience that the states will gain in the regulation of TENORM using the model rule and any additional TENORM studies that may be conducted, the definition of TENORM and EPA's comments should be reexamined during the next revision of Part N.

2. Release of Solid Materials (Clearance) and Conditional Release The NRC staff, as directed by the Commission, is currently proceeding with enhanced participatory rulemaking on the control of solid materials. The Conference of Radiation Control Program Directors, through a resolution, recommended that NRC move forward with the rulemaking process by developing national standards for the control of solid materials and that the technical bases developed by NRC include considerations of naturally-occurring and accelerator-produced

radioactive material and TENORM. The EPA and DOE are also currently working on developing standards for the release of solid materials. In addition to federal agencies, the National Council on Radiation Protection and Measurements (NCRP), is preparing a report with recommendations on alternatives for disposition and possible recycling of solid material. In this revision of Part N, the SR-N Committee only addressed the conditional release of metal for recycle of equipment contaminated with a maximum exposure level of 50 microroentgen per hour including background. However, with the additional information that should be forthcoming from these current studies by federal agencies and other organizations, the release of solid materials should be reexamined during the next revision of Part N.

3. Disposal of TENORM The EPA expressed concerns that the provisions in N.8a. addressing the disposal of TENORM were not adequate for the protection of groundwater. This concern was addressed by stating that SR-N believed that the 25 millirem per year all pathways criteria is protective of the environment with an adequate margin of safety. The SR-N committee believes that TENORM contamination of groundwater is very unlikely with the exception of uranium mining, rare earth metals extraction industries, or a few other metals mining and extraction industries where NORM is known to exist in significant concentrations (e.g., copper). These types of industries are currently subject to existing federal and state statues that address the protection of groundwater. However, this issue should be considered a matter for future consideration. EPA should identify for SR-N situations in which TENORM contamination of groundwater occurred that was not amenable to regulatory intervention under the existing environmental laws.

4. Table of Doses The Table of Doses and the dose terminology in N.22c.iii.(12) and N.23b. were revised to include the present terminology used in Part D and 10 CFR Part 20.

5. Concentration Limits Concentrations limits for other radionuclides should be developed for N.4 (Exemptions) and N.10b. (General License).

6. Regulatory Guidance A regulatory guide identifying the procedures for obtaining Agency approval as specified in N.10e.ii. for the transfer of material, equipment or real property not made in accordance with N.10e.i. should be developed.

7. Appendix A When NRC and the Agreement States adopt a dose based criteria for acceptable levels of surface contamination, Appendix A should be replaced using similar criteria. (e.g., ANSI/HPS N13.12-1999 *Surface and Volume Radioactivity Standards for Clearance*)

8. RSO Requirements Additional provisions to N.21 and N.22 should be considered to address RSO requirements and responsibilities consistent with anticipated changes to Part C.

Implementation Guidance for Regulation and Licensing of Technologically Enhanced Naturally Occurring Radioactive Material (TENORM) Part N of the Suggested State Regulations for Control of Radiation (SSRCR)

Prepared by the
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TABLE OF CONTENTS

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1.0 Introduction

This document is intended to assist both regulatory authorities and the regulated community with interpreting and implementing the provisions of Part N of the Suggested State Regulations for Control of Radiation (SSRCR), entitled, “Regulation and Licensing of Technologically Enhanced Naturally Occurring Radioactive Materials (TENORM).” No requirements are added in this document beyond those established in Part N. The concept of as low as reasonably achievable (ALARA) shall be considered in application of Part N. ALARA is a basic principal of radiation protection, but is best applied as guidance for implementation, rather than explicit regulation. As defined in 10 CFR 20, ALARA means making every reasonable effort to maintain exposures to radiation as far below the dose limits as is practical consistent with the purpose for which the licensed activity is undertaken, taking into account the state of technology, the economics of improvements in relation to state of technology, the economics of improvements in relation to benefits to the public health and safety, and other societal and socioeconomic considerations. The National Council on Radiation Protection and Measurements (NCRP) provides a more extensive discussion of the principles of ALARA (NCRP93). The regulatory standards contained in Part N are based on those established by the United States Nuclear Regulatory Commission (NRC) and the United States Environmental Protection Agency (U.S. EPA). TENORM is generated as part of processes in many industries, and companies in these industries must assure that adequate controls are in place to prevent contamination of the environment, and to protect public and employee safety. Realizing this diversity, the Conference of Radiation Control Program Directors, Inc. (CRCPD) has developed a flexible model state regulation (SSRCR) that can be adapted by the regulator to the TENORM hazards of the state. When utilizing Part N as a model for their TENORM regulations, each state must establish standards and regulations that are consistent with their current standards for protection of public health and the environment.

Different standards for radiation dose to the general public apply during a company’s operations than for exposures from post operational and disposal activities. The NRC standard for dose to the general public from operational or licensed activities is an annual limit of 1 millisievert (mSv) [100 millirem (mrem)], total effective dose equivalent (TEDE). This standard has also been adopted by the Agreement States as a matter of compatibility with NRC. NRC in 10 CFR 61 established 250 microsieverts (µSv) (25 mrem) per year whole body as the limit for the reasonably maximally exposed individual from disposal of radioactive material. It is important to note that this limit is based on dosimetry published in an ICRP Committee 2 Report of 1958 and is not a TEDE. The U.S. EPA recommends an annual dose limit to members of the general public of 100 µSv (10 mrem) TEDE from any single source in the environment. The U.S. EPA also has established a recommendation of 150 µSv (15 mrem) per year TEDE for decontamination of sites. Although the NRC limits were established for Atomic Energy Act (AEA) material, there is consensus among the authors of this document that these TEDE limits of the SSRCR should apply to all licensed or registered sources of radiation. Furthermore, the radiation protection standards of the NRC (10 CFR 20), adopted by the CRCPD (SSRCR Part D) limit the total dose from all licensed and/or registered sources of radiation, which will include TENORM. The NRC limits are endorsed by Part N and this document. Having considered all aspects, the CRCPD has taken a position that the current Part N allows flexibility in the regulation of TENORM. Part N specifies that the public dose (as defined in SSRCR Part A) TEDE limit of 100 mrem for a member of the public should be applied to the total for all specific and general licensed sources of radiation, including TENORM. Part N also applies the USNRC license termination rule of 25 mrem (10 CFR 20) for decontamination and termination of license for land and facilities. Part D of the SSRCR (10 CFR 20) governs both occupational and public doses from exposure to TENORM. Training requirements for workers are addressed in Part J.12 of the SSRCR (10 CFR 19.12).

The exemption level for TENORM under Part N is 0.18 becquerels (Bq) [5 picocuries (pCi)] of radium per gram (any combination of radium-226 and radium-228). This is the same exemption level established for the clean up of property contaminated with uranium mill tailings. It is important to note that this concentration is an exemption level below which most materials are exempt from regulation. It does not mean that every material above this level must necessarily be regulated. Since most TENORM is in the form of scales or sludges with a lower radon emanation fraction than uranium mill tailings, the exempting of soil or media contaminated to this level is considered protective of public health.

The exemption of 5 pCi/g of total radium (i.e., Ra-226 and Ra-228) in Section N.4a.i. is based on the net concentration above natural background. Although there are large variations in the natural background of total radium in geological materials, the average background is about 2 pCi/g (NCRP87, Myrick83, MARSSIM00). Although outcrops of minerals with elevated concentrations of radium (e.g., phosphate ore with concentrations around 30 pCi/g, bastnasite rare earth ore with concentrations of over 50 pCi/g, and uranium ore with concentrations exceeding hundreds of picocuries per gram) exist, they are relatively uncommon where the exemption level of 5 pCi/g is applicable.   Background concentrations of total radium, appropriate for applying the radium exemption of up to 5 pCi/g, will generally range from 2 to 5 pCi/g. The application of higher background values will be subject to approval by the Agency. Extensive information and procedures for determining natural background are provided in *the Multi-Agency Radiation Survey and Site Investigation Manual* (MARSSIM00).

Other naturally occurring radionuclides, e.g., tritium, carbon-14, and potassium-40, may also be concentrated as TENORM. Part N does not attempt to regulate and should not be applied to any material that is defined as source material or uranium by-product material (which includes thorium by-product material) regulated pursuant to the Uranium Mill Tailings Radiation Control Act of 1978 (UMTRCA).

Of the diverse companies that generate TENORM and accumulate TENORM waste, many may not have personnel familiar with radiation safety. They will, nevertheless, be required to comply with state regulations based on Part N of the SSRCR and to demonstrate basic radiation safety and environmental control. To do this they will need to have an understanding of Part N requirements and methods of complying with these requirements to prevent the spread of contamination and to assure employee and public safety. In addition, states may need more detailed information than is contained in Part N to properly draft and implement their own TENORM regulations. This document was developed to address these needs by providing guidance, in regard to TENORM, on the following topics:

1. standards for the use of radioactive material;
2. standards for disposal of radioactive material;
3. selection of dose assessment models;
4. selection of parameters for dose assessment models; and,
5. a framework for common understanding among state regulatory agencies, companies, workers, and the general public regarding adequate measures for compliance with Part N.

This document has seven sections, followed by appendices and citations of references. Topics covered are: the material regulated; the types of licenses required; how materials contaminated with TENORM may be transferred from one person to another; TENORM disposal issues; suggested dose assessment models and parameters of the models; the decommissioning of TENORM licensed facilities; considerations for measurement of TENORM; and financial assurance considerations for TENORM. The radiation protection standards for TENORM are discussed in Sections 1.1 and 1.2.

Part N is not intended to revisit past activities or operations that were performed in accordance with what had been accepted practice or regulations or activities approved by the state regulatory agency prior to the effective date of implementation of Part N by the Agency. Accepted practice or activities approved by the Agency refer only to those practices or activities associated with the subject state that has implemented Part N. However, the regulations of Part D would also have general applicability. Where intervention takes place under other appropriate environmental remediation statutes, the principal of justification will apply (see NCRP93, p. 50)

1.1 Basic Radiation Protection Standards

The general standards for radiation protection for TENORM are consistent with Part D and are incorporated by reference in Part N. The standards for workers during operations are those of Part D.

The standards for radiation protection for members of the public, also from Part D, are given in N.5.

The standard for members of the public is a public dose from all licensed or registered sources of radiation of 100 mrem per year. N.5a. refers to controlling exposure to the general public from activities licensed or registered by the Agency or other radioactive materials licensing agencies (e.g., NRC). The 100 mrem per year limit includes exposures from all licensed or registered sources, including TENORM. This follows the National Council on Radiation Protection and Measurements assertion that exposure to more than one source at a substantial fraction of the annual limit is not likely for any particular individual.

The as low as is reasonably achievable (ALARA) principle shall be applied in implementing Part N. Procedures shall be followed, to the extent practicable, based upon sound radiation protection principles to achieve occupational doses and public doses that are ALARA. As low as is reasonably achievable (ALARA) is defined in Part A of the SSRCR. ALARA is not to be construed as a radiation protection standard, as has been indicated by the NRC in 52 Federal Register 2822, 2826 (1987).

Determination of the radiation dose for compliance with Part N from operational or licensed activities is based on assessments of the dose for the “reasonably maximally exposed individual.” The NRC uses the dose to the “average member of the critical group” for decommissioning and termination of license actions for 10 CFR 20. Licensees and agencies should be aware of the potential presence of AEA materials (i.e., special nuclear, source, by-product, 11e(2), material) and, when performing decommissioning and termination of license actions, ensure that cleanup actions and any related radiation dose assessments meet all regulatory requirements. For application to decommissioning and license termination activities, N.7b. specifies that the dose to the average member of the critical group will not exceed 25 mrem per year.

The exemption of 5 pCi/g of radium applies both to operations and for termination of licenses. Under some scenarios, the potential dose from 5 pCi/g may exceed the license termination criterion of 25 mrem per year. This is similar to the situation for uranium and thorium recovery facilities (i.e., milling sites), where the NRC has recognized that the dose of 25 mrem per year may be exceeded after remediation. The remediation standards for uranium and thorium recovery facilities are taken from the EPA regulations in 40 CFR 192, as implemented by NRC in 10 CFR 40 (i.e., Appendix A Criterion 6). In 10 CFR 20.1401(a), the license termination criterion of 25 mrem per year specifically excludes uranium and thorium recovery facilities already subject to Appendix A of 10 CFR 40.

N.7b.iii. specifies that when both radium and other licensed radionuclides are present, that the "unity rule" shall be applied to ensure the sum of fractions of the 25 mrem TEDE dose and 5 pCi/g radium criteria are less than or equal to one.

Environmental pathways radiation dose assessments for residual concentrations of 5 pCi/g of radium, using the normal default parameters of risk assessment models, may indicate potential radiation doses greater than 25 mrem per year. The example given in Chapter 5 of this guidance demonstrates this. However, the use of reasonable site specific parameters for occupancy times, actual pathway scenarios, and other parameters will often indicate potential doses, for sites with residual radium at or less than the exemption concentration of 5 pCi/g, of less than 25 mrem per year. Furthermore, prudent remediation at a licensed site and application of ALARA will generally result in average residual concentrations related to license termination below the exemption level of 5 pCi/g of radium.

ALARA shall be applied in implementing Part N. An example of applying ALARA is the determination of land areas that meet the exemption of N.7c., which specifies that characterization shall be based on averages for areas of 100 m^2 and depth increments of 15 cm. It is suggested that proper application of ALARA for this situation would require remediation of areas of about 1 m^2 or more which have concentrations of radium greater than three (3) times the exemption of 5 pCi/g (above background). That is, even though a concentration of radium of 50 pCi/g in an area of 1 m^2 (assuming a depth increment of 15 cm) may result in an average of less than 5 pCi/g over the 100 m^2 area, consideration of ALARA requires reasonable efforts to remove the elevated material. Hence, a specific example of ALARA is that reasonable effort should be applied to remove residual contamination more than three (3) times the exemption criterion, even if the average for a 100 m^2 area meets the exemption criterion.

If termination of a license or unrestricted release of TENORM is likely to result in a TEDE of greater than the license termination criterion of 25 mrem per year or the 5 pCi/g radium criterion (also unity rule), the state can consider options of alternate dose criteria, such as presented in the license termination rule, or require additional cleanup.

Furthermore, the state may want to consider the guidance of the National Council on Radiation Protection and Measurements, "Limitation of Exposure to Ionizing Radiation," NCRP Report No. 116, Chapter 16, Remedial Action Levels for Naturally Occurring Radiation for Members of the Public ((NCRP93) for case-by-case application.

In summary, the exemption of 5 pCi/g of radium, above natural background, is intended for application to sites contaminated with radium. However, radiation dose assessments should be performed for contaminated licensed sites that are remediated for termination of license. The license termination criterion of 25 mrem per year is generally applicable for termination of licenses at all TENORM sites, but case-by-case determinations may demonstrate the need to use alternative dose criteria for sites where the 5 pCi/g radium exemption limit is used.

N.7e. specifies that actions to confine TENORM on sites or remediate sites shall be based on expected longevity of the controls for 1,000 years, with an option that a longer time may be specified. The expectation for longevity refers to prudent application of institutional controls, the engineering design of the remediated site, and radioactive decay of residual contamination. The expectation for longevity should encompass all these aspects of the project. Institutional controls could include government ownership and regulations regarding land or resource use, and annotation of deeds to limit future land use. The potential for erosion, intrusion, and potential flooding shall be considered. Part N emphasizes the need for permanent solutions to minimize the potential for future CERCLA involvement.

1.2 Radiation Dose from Radon and Its Decay Products

N.5c. notes that doses from inhalation of indoor radon and its short half-life (less than 1 hour) progeny shall not be included in determination of the TEDE, except when the dose is due to effluent releases from licensed operations involving handling or processing of TENORM. These exclusions of the dose from radon and its decay products are for both radon-222 and radon-220. The exclusions only apply to the radiation dose from inhalation of radon and its short half-life (i.e., less than one day) decay products indoors for the standards for the members of the public. These exclusions do not apply to the inhalation dose for radiation workers, for which Part D provides Derived Air Concentrations (DAC's) and effluent limits for releases from licensed sites, for which Part D also provides concentration limits. It is suggested that the U.S. EPA guidance for indoor air of 4 pCi/l be applied for off-site buildings; e.g., residences, schools, etc.

The exclusion of the dose from radon and its short half-life progeny is only for the inhalation dose. The dose from external gamma is included for both radiation measurements and for environmental pathways modeling.

2.0 Do I have TENORM?

Companies may question whether material they have is TENORM. TENORM may accumulate to significant levels in process operations involving the extraction, purification, filtration, smelting, or pipeline transport of virtually any material of geologic origin. Surface and groundwater, metals, petroleum, natural gas, and process treatment sludges are among such materials. The underlying principle that distinguishes naturally occurring radioactive material (NORM) from TENORM is that, with TENORM, an increased concentration of radionuclides over that found in the same material in nature has resulted from human activity. This section gives guidance on determining whether a material is TENORM or is NORM that is not regulated under Part N, or is radioactive material regulated under other federal or state regulations. The guiding principle for distinguishing TENORM from NORM is if there has been an increase in the concentration of radionuclides that has resulted from human activity over that found in the same material in nature. The concentrations of radioactive material are not the guiding issue.

Industries that use naturally occurring radioactive materials must assess their processes to determine where NORM material could be concentrated so that it becomes TENORM. To make this determination industries must analyze the materials they are using, understand the chemical and physical properties of naturally occurring radionuclides, and analyze their products and waste streams to determine if NORM has been concentrated into material that would be considered TENORM. See the NORM 3 Report (CRCPD94-2) for discussion of industrial practices that result in concentration of NORM. The concentration of NORM may increase or decrease during various phases of processing material. The facility should protect workers from radiation exposures and control any releases of material to the environment, during that stage of operations, to the standards applicable to a general licensee as specified in N.10. Where NORM material is concentrated at intermediate stages of a process, but the NORM concentration in the final products or waste is not more than the NORM concentration in the natural material used as feedstock, the final products or waste are not TENORM. The regulation of waste streams and final products should be based on the assessment of those wastes and products. However, a regulatory authority may elect to consider specific stages of a process to trigger the application of criteria for a general license.

2.1 Is my material source material or uranium or thorium by-product material?

Part N applies to naturally occurring radioactive material, other than source material, whose concentration has been technologically enhanced. Source material is defined in Part A.2 of the -SSRCR and in 10 CFR 40.4 as “uranium or thorium, or any combination thereof, in any physical or chemical form; or, ores that contain by weight one-twentieth of one percent (0.05 percent) or more of uranium or thorium, or any combination of uranium or thorium.” The definition of TENORM specifically excludes source material and by-product material as both are defined in the Atomic Energy Act of 1954, as amended, as implemented by the Nuclear Regulatory Commission.

Some source material by-products and mill tailings defined by 10 CFR 40 are regulated by NRC and Agreement States. This preempts states from regulating these materials as TENORM. Some source material by-products and mill tailings processed prior to 1978 may not be regulated by the NRC and therefore, may be regulated by states as TENORM. Uranium by-product is defined as waste material that has become contaminated from the fuel cycle or uranium recovery operations. UMTRCA also sets standards for cleanup of lands and facilities that have become contaminated from the fuel cycle industry. Waste material and tailings that were generated from recovery of source material either under the Atomic Energy Act or an NRC or Agreement State license are controlled and regulated under existing regulations for uranium mill tailings. The federal regulations established under 10 CFR 40 and UMTRCA have established clean-up standards and standards for disposal of uranium mill tailings and by-product materials.

Part N of the Suggested State Regulations for Control of Radiation establishes model regulations for “technologically enhanced” naturally occurring radioactive material. Materials that are radioactive, but in which the radioactive constituents have not been concentrated through human intervention, are not addressed by Part N. Soil and rocks that are naturally radioactive and materials made from these, provided that human intervention has not concentrated the naturally occurring radioactive materials, are not regulated by Part N. Removal of NORM from its natural mineralogical state does not of itself increase the concentration of radionuclides in the NORM.

2.2 How do I know if my TENORM is included or exempted from regulations?

After determining that NORM has been or could be concentrated in a process, the company must refer to N.4 to determine if the material is exempted by regulation. Part N recognizes that the societal benefit of some materials, such as fertilizers, outweigh the radiation associated risks presented by the materials and exempts these materials from regulations. Some TENORM materials are adequately controlled under other regulations such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Resources Conservation and Recovery Act (RCRA) and have been exempted from regulation by Part N for that reason. Part N does not address the regulation of TENORM while the material is in transport. Regulation of storage incident to transport and transport are addressed by Parts D and T of the SSRCR's. N.4 exempts persons who receive TENORM products or materials that are manufactured and distributed as exempt products under a specific license.

N.4a.i. presents the most difficult case for determining whether materials are exempt or regulated by Part N. This exemption applies to materials such as soil, scales and sludges containing TENORM that is dispersed throughout the materials. This exemption does not apply to surface contamination on equipment, such as pumps, valves and piping, that is contaminated with scales or other material containing TENORM.

To apply this exemption to equipment such as pipe, it must be determined that the concentration of total radium is less than 0.18 Bq (5 pCi) per gram in the scales excluding the weight of the pipe or object contaminated with scales or other TENORM containing material. The release of equipment for unrestricted use is addressed in N.7.

N.4a. does not explicitly prohibit the purposeful dilution of waste to render the waste exempt from regulation, but this is covered in N.8c. and N.9. Purposeful dilution to render TENORM exempt shall not be performed without regulatory agency approval. This definition of purposeful dilution does not include reductions in TENORM concentrations incidental to normal product processing. The definition of waste has been generally accepted as being material that has no further useful purpose. Waste streams must be analyzed separately to determine if the concentration is greater than the exempt limit prior to mixing the waste streams. Waste materials subject to regulation under Part N by virtue of their TENORM concentrations may not be commingled with materials that are exempted by N.4 unless authorized by the Agency. The Agency may consider relative volumes, radionuclides and their concentrations, and chemical and physical characteristics of waste streams in approving commingling of wastes for management.

There are varying definitions of waste; however, wastes encompass materials that have low financial value to those who possess them. If material is recycled it is not a waste. The NRC's rulings concerning "Alternate Feed Policy," allowing materials with recoverable source material to be processed at uranium mills, with subsequent disposal of the remaining material as mill tailings, is an option for management of pertinent TENORM materials.

This subsection disallows soil mixing, spreading, or landfarming of contaminated materials to achieve exempt concentrations unless the regulatory agency has previously authorized the activity. States may allow landfarming or on-site disposal of regulated material under N.8a.iii. However, alternate methods of disposal for materials that are not exempted must be approved by the regulatory authority and should not be initiated without such approval. Further discussion of landfarming is contained in Section 4 of this document. If a determination is made that the TENORM or TENORM contaminated material is regulated under Part N, then it must be determined whether the material is subject to Part N's general license or specific license provisions.

Section N.4d. denotes that distribution, including custom blending, possession, and use and disposal of zircon, zirconia, and zircon products may be exempt. The concentrations of uranium and thorium in these materials are less than 0.05 percent and conservative radiation dose assessments have indicated that the radiation dose to workers is less than 1 mSv per year (100 mrem/year) TEDE. The critical radiation dose pathway for workers is inhalation. The potential dose from inhalation is reduced from prior analyses by consideration of the physical size of airborne material. For example, the high density of zircon particles, which results in an average equivalent aerodynamic diameter (EAD) of greater than 5 micrometers, versus the usual default particle size of 1 micrometer EAD. The revised dose assessments have used the dosimetry of International Commission on Radiological Protection (ICRP) Publication 68 (ICRP94) which has been accepted by the NRC Commissioners and Technical Staff (NRC 99-077, April 1999) in a license amendment and by the Illinois Department of Nuclear Safety in a license amendment for the West Chicago Rare Earths Facility. The Commission has approved the staff granting exemptions on a case-by-case basis for those licensees requesting to use the ICRP revised internal dosimetry models. The dosimetry information is available through the CRCPD web page (www.crcpd.org). The exemption of zircon related materials is specifically denoted as an option that may be incorporated by a state.

The exemption for fertilizer, zircon, zirconia, and zircon products is for distribution, including custom blending, possession, and use and disposal of the materials. The manufacturing or processing (i.e., mining or extraction of zirconium metal) of these materials is not explicitly exempted. The Agency should evaluate the manufacturing facility and process to determine whether a general or a specific license is necessary. Furthermore, the option of licensing specific equipment or processes, versus total facilities, can be considered.

3.0 Licensing

3.1 Introduction

TENORM is widely distributed and exists in conjunction with other materials desired for their non-radioactive attributes. As a result there are many products, materials and sites that contain TENORM at concentrations that require some level of control. This realization has been the driving force behind the development of Part N and requires a fundamentally different approach to regulating TENORM compared to other activities addressed in the SSRCR. An applicant for a radioactive material license issued under Part C (or comparable regulations) typically intends to possess and use radiation sources for their radioactive properties and has to affirmatively seek to acquire the necessary sources, whereas the possessor of TENORM often, but not always, acquired the TENORM "passively", i.e., as an unintended, unnecessary adjunct to the material or facility acquired for its other attributes.

On the other hand, basic principles of radiation protection imply that some level of mandatory controls is necessary at many facilities possessing or contaminated with TENORM. In an attempt to strike the proper balance, the drafters of Part N concluded that the majority of facilities possessing TENORM should be subject to a general license, with provisions for specific licenses for those facilities and activities for which more stringent controls are appropriate.

3.2 What is a general license and do I need one?

Part N establishes a general license for anyone who possesses TENORM unless that person is exempted or required to obtain a specific license. A state adopting Part N should r ensure that the procedures for issuing the TENORM general license and making it applicable to a specific facility are consistent with the States administrative procedures.

N.10d. provides the option of a notice to the state of a facility's intent to be covered under the general license. The state may elect to require notice of intent as a prerequisite for coverage; under such a regulatory scheme, facilities which possess TENORM, but which do not notify the state TENORM licensing agency, are then operating in violation of regulations and may be subject to enforcement of the regulatory requirement. On the other hand, a state having many TENORM facilities, in order to reduce the regulatory burden and the administrative overhead, may elect not to require notification as a prerequisite, or even not to provide for notification at all.

Enforcement is one factor influencing this decision. Each state must determine how compliance with the regulation and the general license will be assessed. If routine inspections are contemplated, some mechanism to identify and locate TENORM facilities is required, and building a notification requirement into the general license provisions is one way to do so. However, if the state elects only to respond to incidents reported through other channels, notification may not be required.

Most TENORM is produced incidental to an industry’s main products. Examples are scale in oil and gas production, resins in water treatment, some phosphate wastes in the fertilizer industry and wastes in the rare earths and metal industries. Other industries also may concentrate NORM that would be regulated under Part N. N.10 issues a general license to possess, use, transfer, distribute or dispose of TENORM subject to the requirements of Sections N.5 through N.10.

A general licensee may continue operations with minimal burdens from regulation. The general licensee must control TENORM to the extent that the spread of contamination and excessive exposure to workers and the general public is prevented. N.10d. requires each general licensee to notify the regulatory agency of TENORM in custody. This is an option that a state may choose to impose or not impose depending upon its regulatory philosophy.

A general licensee may perform routine maintenance on TENORM contaminated equipment, facilities, and land that the general licensee controls. However, N.10c. prohibits the general licensee from performing decontamination. Routine maintenance differs from decontamination in that it does not generally involve the potential for significantly increased exposure of workers to TENORM contamination and radiation. The general licensee should therefore review all aspects of the operation to determine which activities may increase the potential for additional radiation exposure and contamination of workers. For example, confined space entries per 29 CFR 1910 should be evaluated to determine if special procedures are required to prevent the workers from receiving a dose in excess of 10% of the occupational limits (e.g., 5 mSv [500 mrem] per year TEDE) specified in Part D of the SSRCR (see N.5b). For purposes of radiation protection, any recurring activity that increases the worker’s exposure in excess of 10% of the occupational limit is considered a significant dose and may require a specific license. Any activity conducted for the specific purpose of removing TENORM, such as scale contaminated with radium at concentrations not exempt, must be conducted by personnel operating under a specific license. Pipe and equipment released for use based on an approved screening procedure should be used in the same condition in which it was received. A person under a general license who accepts the pipe or equipment is not authorized to perform decontamination of the pipe or equipment received. The Agency’s approval of screening methods includes an assessment of the radiation levels on the equipment or pipe and a determination that a release of the pipe or equipment, as it exists at time of release, is consistent with N.5. Activities that remove TENORM contaminated scales from pipe or equipment generate waste that may exceed the exempt concentration of radium and increase the potential for internal and/or external exposure. Therefore, a specific license is required to perform this activity.

Contaminated equipment, facilities and land may be transferred from one general licensee to another general license under the following conditions: The transferor must notify the recipient that the facilities, equipment or land is contaminated with TENORM that is subject to regulation; and the transferor must determine that the recipient has committed to use contaminated facilities and/or equipment for a similar purpose. For example, the transfer of equipment like a drier or separator from a niobium producer to a tin producer or transfer of contaminated oilfield pipe to another person if the contaminated pipe is to be used in oil and gas production constitute "similar purpose." However, the recipient of contaminated pipe is prohibited from using the pipe for irrigation or transport of drinking water and shall not use the pipe for construction purposes unless it has been released for unrestricted use in accordance with a method acceptable to the regulatory agency for releasing the pipe.

N.10e. provides two options for transfer of land, Sections N.10e.i. and N.10e.ii. N.10e.i. provides the basis for transfer of land with either annotation of the deed records or notice to be given to owners of surface and mineral rights. N.10e.ii. notes that if the requirements of N.10e.i. are not met, prior written approval must be obtained from the Agency. To obtain this approval, the general licensee shall submit information that demonstrates compliance with N.7 where, N.7 requires demonstrating that the site meets requirements for unrestricted use, or written approval by the Agency for alternative criteria. Records of such compliance shall be maintained by the general licensee as specified and submitted to the Agency upon request.

N.7f. provides for conditional release of metal, with limited contamination, for recycle. It is clarified that this is not to be a means of waste disposal without written approval of the Agency. However, the Agency has the option, by a rule-making or administrative decision, to make this a viable management alternative at a permitted disposal site.

Land that is contaminated above release limits may be transferred from one licensee to another as authorized by the regulatory agency. N.10e.i.(2) provides for the state to require annotation of the deed or, at a minimum, a disclosure to the recipient that the land is contaminated with TENORM above the concentrations allowable for release.

Release of bulk material (e.g., truckloads) must be evaluated to assure that the release of such material complies with the criteria for release as set forth in Part N.

N.10e.iv. prohibits the release of any equipment, facilities, or land for unrestricted use unless the general licensee complies with the requirements of N.7. The person who transfers contaminated equipment or property may be required under N.10e.iii. to make measurements that confirm the contamination is within the limits of N.7 and to retain the documentation of these measurement results. Recipients of equipment, facilities, or land not meeting the requirements of N.7 become general licensees. It then becomes their responsibility to restrict access to the contaminated property, maintain it to prevent contamination and/or exposure, and prevent unauthorized use. N.10f. requires written disclosure of the type and amount of TENORM. The disclosure may be MSDS certification or equivalent information describing the identity of the TENORM material, e.g., pipe scale, 55 gallons, not exceeding 1 Bq per gram (27 pCi/g). N.10g. gives the Agency the authority to require in writing that a general licensee apply for and obtain a specific license. The Agency shall state the reason for determining that a specific license is required.

N.9 provides prohibitions, noting that purposeful dilution to avoid regulation as TENORM is prohibited without prior Agency approval. This definition of purposeful dilution does not include reductions in TENORM concentrations incidental to normal product processing.

3.3 What is a specific license and do I need one?

A specific license requires the submission of an application to the Agency and the issuance of a licensing document by the Agency. The licensee is subject to all applicable portions of the Agency's regulations and any limitations specified in the licensing document. The requirements for a specific license with regard to TENORM are contained in N.20 through N.31. Anyone who wishes to receive, possess, use, process, transfer, distribute, or dispose of TENORM that is not exempt from regulation, and who does not qualify for a general license, must apply for and receive a specific license. These activities include the manufacture and distribution of consumer or retail products containing TENORM the possession and use of which are exempt under N.4a. Manufacture and distribution of other products (e.g., commercial products) should be evaluated by the licensing authority to determine if a license is required. A transfer of products containing TENORM between general licensees under N.10f. does not require a specific license, nor do persons exempted under N.4 require a specific license. Anyone who decontaminates equipment, facilities or land that is the property of someone else, unless performing routine maintenance under contract and in accordance with Section N.10c., must apply for and receive a specific license. Anyone who receives TENORM waste from other persons for storage, treatment and/or disposal must apply for and receive a specific license or a general license based on an applicable permit (disposal only) from other agencies (e.g., N.8a.iii. and N.8a.v.).

Labeling requirements under N.22c.iii.(9) are required to ensure that adequate information is provided with the transfer of items. The licensee may propose alternative labeling procedures for approval by the Agency.

3.4 On-site waste management

Concern should be given to proper management of TENORM waste. Good practices for managing TENORM waste on site include an evaluation of the following areas:

- erosion prevention such as use of bermed areas;
- preventing migration and infiltration with such methods as lined areas [e.g., concrete, clay or high density polyethylene liner (HDPE)];
- prevention of wind blown migration by use of covers or containers.

In summary, following sound principles of pollution prevention and minimization that are established in other waste management programs should result in minimizing worker and public exposure to TENORM wastes managed on site.

4.0 How do I transfer or dispose of TENORM waste?

Disposal and transfer of TENORM waste is covered in N.8. The transfer of TENORM waste is a separate matter from the release of equipment or facilities contaminated with TENORM that is covered in N.7. The discussion that follows is intended to give guidance on:

- disposal options;
- types of TENORM that are appropriately disposed via each option;
- methods for evaluating the disposal of TENORM using each option;
- key issues to evaluate when considering TENORM disposal via each option.

4.1 What are the disposal options under Part N?

Section N.8 contains the following options for disposing of TENORM:

1. Transfer of the wastes for disposal to a facility licensed pursuant to 40 CFR 192 under requirements for uranium or thorium byproduct materials in either 10 CFR 40 Appendix A or equivalent regulations of an Agreement State; or
2. Transfer of the wastes for disposal to a disposal facility licensed by the NRC, an Agreement State, or a Licensing State; or
3. By an alternate method authorized by the permitting agency for the disposal site upon application or upon the agency's initiative. The authorized method must ensure that no member of the public receives an annual TEDE from TENORM in excess of dose criteria. The disposer is also responsible for compliance with applicable Clean Water Act, Safe Drinking Water Act and other US EPA requirements for disposal of such wastes.

These options include disposal at sites licensed by the NRC or Agreement States and also provide the option for disposal of waste at sites that have been permitted for receipt and disposal of appropriate waste by other applicable regulatory agencies. Part N is not intended to foreclose the option of transferring TENORM waste to regulated waste disposal facilities, including RCRA-permitted solid waste disposal facilities. N.8a. clarifies that acceptance and disposal of TENORM waste is conditional upon the absence of express prohibition, e.g., by the disposal facility's operating permit, and must not be contrary to applicable federal and state law governing the type of TENORM waste to be disposed.

Depending upon the type, physical and chemical form, and the quantities of radionuclides, there are other specific disposal options that a state may consider under N.8a. These include, but are not limited to: landfills permitted under RCRA, Subtitle C and D or state equivalent; injection wells permitted under federal or state regulations, e.g., 40 CFR 144 (Underground Injection Control Program); and land application of TENORM materials.

TENORM disposal within impoundments meeting the requirements for disposal of byproduct materials under provisions providing protection equivalent to regulations developed under 40 CFR 192 is consistent with Part N and should be acceptable to state regulatory agencies. This method for disposal of TENORM waste should also be sanctioned within facilities operating under a specific license issued by NRC or an Agreement State. Final decisions must be approved by the appropriate regulatory agencies.

As of the publication of this guidance, U.S. EPA has issued draft guidance on disposal of drinking water treatment wastes and regulations on uranium mill tailings, but no requirements for TENORM disposal.

Under N.8a., states may authorize alternative methods for disposal of TENORM wastes. While relatively high hazard TENORM wastes may be appropriate for disposal within specifically licensed facilities, wastes with relatively low TENORM concentrations may more appropriately be disposed of in general licensed facilities such as specially designed and controlled landfills. On-site disposal, in conjunction with institutional controls, may be the most feasible option where large volumes of mildly contaminated materials are involved. Some states have approved down-hole disposal of certain oil field wastes as an appropriate option. N.8a. is intended to provide states with considerable flexibility in determining acceptable disposal methods for unique TENORM materials as long as the Agency agrees the dose criteria in N.5 will be met. State approval of disposal options can be based on *de novo* proposals by applicants or on generic evaluations of various processes or disposal options which have been previously evaluated as acceptable by a state regulatory agency, U.S. EPA or NRC.

Equipment which is contaminated with TENORM in excess of levels specified in Appendix A to Part N, and which is to be disposed of as waste, has separate requirements. The disposal method must prevent any reintroduction into commerce or unrestricted use; and, the disposal area and methods must meet the same criteria as other types of TENORM wastes.

Records of disposal, including manifests if appropriate, must meet the same requirements as other types of radioactive wastes. These requirements can be found in Part D of the SSRCR. Methods involving disposal on-site, such as land farming and down-hole disposal, do not require manifests.

4.2 How do I evaluate a proposed transfer of TENORM waste for disposal?

If the TENORM for disposal is being transferred to an appropriate disposal facility licensed or with an appropriate permit to accept the type of waste in question, evaluation is greatly simplified. Handling, packaging and transport of the waste will be governed by state regulations for radioactive waste in general and by the disposal facility's permit requirements for acceptance of TENORM waste and by 49 CFR for transport outside the confines of the TENORM waste generators facility.

If the TENORM in question is to be managed and disposed of in accordance with N.8a. (i.e., an alternative method approved by the regulatory agency) the evaluative process becomes very important and much more formal. In this situation, TENORM waste evaluation presents some special difficulties. First, TENORM comes from a variety of sources, can take many different chemical and physical forms, and can contain many radionuclides in widely differing amounts. The CRCPD NORM 3 Report (CRCPD94-2) reviews many of the types of TENORM and their characteristics. Second, states can have differing performance criteria and dosimetric approaches for evaluating TENORM waste. So the method of evaluation will depend to a certain extent on the characteristics of specific TENORM waste under consideration and the criteria established by the particular state in which the disposal is being proposed.

An evaluation begins with the dose criteria that have been established by the host state of the disposal site. The maximum allowable annual public dose from all licensed and registered sources established by N.5a. is a TEDE of 1 mSv (100 mrem). States may elect to adopt some fraction of 1 mSv (100 mrem) per year as the dose criteria that must be met during the evaluation.

Once dose criteria have been established by a state, there is a need for specific guidance on modeling, sampling, analysis, etc., that will be acceptable to the Agency in support of the proposed disposal methodology. The goal of the analyses is to make realistic projections of dose that indicate that the reasonably maximally exposed individual will not receive an annual TEDE in excess of the state's standard. The evaluation necessarily involves assumptions, methods of calculation and analyses of uncertainties that are compatible with the Agency's expectations. Therefore, detailed guidance on these aspects should be made available by the Agency. The evaluation process, as assisted by currently available computer models, is discussed in the next section of this guidance document.

5.0 How do I evaluate my site for release under Part N?

This section provides information on computer assisted radiation dose forecast techniques currently in use. The objective of these computational models is to use the available information to make a good approximation of the radiological health risk to the population affected, and on that basis to make informed risk management decisions about the action under consideration. In practice, state risk management decisions under Part N are governed by the projected annual dose (TEDE) to the reasonably maximally exposed individual. Section N.5a. adopts 1 mSv (100 mrem) as the annual dose permitted to the reasonably maximally exposed individual from all regulated uses of radioactive materials and ionizing radiation.

Determination of the radiation dose for compliance to Part N is based on assessments of the dose for the "reasonably maximally exposed individual." The NRC uses the dose to the "average member of the critical group" for decommissioning and termination of license actions for 10 CFR 20. Licensees and agencies should be aware of the potential presence of AEA materials when performing decommissioning and termination of license actions and ensure that cleanup actions and any related radiation dose assessments meet all regulatory requirements. For application to decommissioning and license termination activities, especially for sites with AEA materials, Agencies and licensees should ensure that the dose limit applied to a specific site will result in a dose to the average member of the critical group from that site that will not exceed the dose limit of 25 mrem for decommissioning and license termination found in SSRCR Part O (See O.9, O.10 and O.11). N.7b. recognizes that potential radiation doses subsequent to license termination may occur from both residual radium that is below the exemption criterion of 5 pCi/g (N.7b.) and other residual radioactive material (i.e., N.7a. limited by the license termination criterion of 25 mrem TEDE), and specifies that the unity rule or sum of fractions for both of these criteria shall be implemented. Please refer back to 1.1 for further discussion.

Dose forecast techniques depend upon pathway modeling to translate environmental concentrations or radiation measurements into doses, and/or risks, to selected populations or individuals. They involve calculations often based on hypothetical situations and are intended to be an aid to decision making.   Since conservative assumptions are usually involved, they may overestimate what will actually occur. There have been extensive efforts over the last decade to develop user-friendly computer programs that incorporate multiple-pathways models. Several programs currently available do not require special expertise in modeling, but should only be used by personnel with professional radiation protection experience. Computer programs are available which calculate the radiation dose and health risk from a broad spectrum of radionuclides for numerous environmental pathways and exposure scenarios. Although some computer programs incorporate models that have extensive flexibility and can be used for assessing the doses from numerous exposure scenarios, generally, they are focused on a limited number of scenarios. Table 1 identifies several models and indicates their primary applications. Since the initial preparation of this Implementation Guidance, the NRC has issued a series of multiple pathway codes, denoted as NRC DandD, which are not listed in Table 1 or addressed in this document. The DandD codes are similar to RESRAD, but use different algorithms (e.g., exclude the inhalation dose due to radon) and use different default parameters. The DandD codes support NUREG 5512, which is mentioned in Table 1. The initial edition was DandD Version 1 and a later edition is Version 2.1.

5.1 What are environmental exposure pathways and exposure scenarios?

The term "environmental exposure pathway" refers to a relationship among contaminated environmental media, various pathways and mechanisms for contaminant transport resulting in human exposure. Figure 1 provides an illustration of environmental exposure pathways. TENORM exposure primarily occurs via direct exposure to external gamma radiation and via inhalation of TENORM contaminated particles. Other modes of potential exposure include ingestion of contaminated water and food. Indoor radon may also be a pathway for radiation dose, but is excluded from the radiation dose criteria of Part N, except when the dose is due to effluent releases from licensed operations from handling or processing of TENORM. See Section 1.2 concerning the exclusion of the inhalation dose from radon and short half-life decay products. The external gamma dose from the short half-life decay products of radon (i.e., less than one day) and the dose from food pathways are included in the dose assessment for the TEDE dose.

The term "exposure scenario" refers to the environmental setting in which people may be exposed via an environmental exposure pathway to a contaminant. Possible scenarios include an infant living in a residential environment where there is TENORM contamination, adults living in a "residential farming" situation, children exposed to TENORM in metal pipes used for playground equipment, and people working in a building contaminated with TENORM. The detailed modeling (RESRAD) example discussed later in this section of the guidance document focuses on the "residential farmer" setting. However, models applicable to other settings, to the general population, and to commercial or industrial settings, are also discussed. RESRAD-Build code (RESRAD94) is a software package designed for assessing the radiation dose to people working in contaminated buildings, and MicroShield (Grove96) is a computer program used for calculating the external gamma dose for various geometries of radiation sources containing various radionuclides.

5.2 Which computer programs for dose assessment are useful for TENORM evaluations?

Table 1 provides a representative list of computer programs available for radiation dose assessment under different scenarios. References for each program, the agency for whom the program was developed and the company developing the program are given. Selected comments on each program are also provided. Most of these programs use multiple pathway models to provide assessments for all of the environmental exposure pathways shown in Figure 1. MicroShield and RESRAD-Build, unlike the multiple pathway models, can be customized to a greater extent and have special applications. However, it should be emphasized that while all computer dose models are useful tools, each has its own limitations and needs to be applied with professional judgment.

5.3 What special use programs can be applied to TENORM evaluations?

MicroShield (Grove96) and RESRAD-Build (RESRAD94) incorporate unique coding that has special capabilities not present in most multiple pathway models. While relatively user-friendly, these programs require that the modeler have a reasonable understanding of the proposed dose scenarios in order to select the proper input parameters. In contrast, the multiple pathways programs have default parameters to cover most required inputs. MicroShield can be used to calculate external gamma dose for numerous source geometries. For example, the program can be used to calculate the external gamma dose from a single pipe containing TENORM (Bernhardt96, Rogers95), from configurations of multiple pipes, and from various geometries of slabs. MicroShield has a WIN95 (Version 5.01) and a Microsoft DOS version.

RESRAD-Build provides the ability to determine the external gamma dose, inhalation dose, and ingestion dose from occupancy of buildings with residual contamination. The assessments require the modeler to provide "knowledgeable" input parameters for the residual contamination and parameters related to inhalation and ingestion. The ingestion scenario can be structured as a dirty-hands concept, where a person interacts with removable contamination and accidentally ingests it.

5.4 What multiple environmental exposure pathways programs are useful for TENORM evaluations?

The RESRAD family of computer programs, developed by Argonne National Laboratory for the United States Department of Energy (DOE), has received wide use due to courses and consultation provided by DOE for state and other agencies. Since its inception, the model has had a user-friendly, menu-driven interface, which has made it relatively easy to use. The programs have been continuously upgraded since their introduction in the early 1990's. The RESRAD programs feature a relatively complete set of input parameters. The positive aspect of this feature is the relative ease of using the model. The negative aspect is the possibility of performing a dose assessment without understanding the underlying model and without having gone through the "thought process" which takes place when developing input values.

The PRESTO and PATHRAE families of computer programs have been developed by Rogers and Associates Engineering (RAE) of Salt Lake City, Utah for the U.S. EPA (RAE is now a member of URS Corp). Most of the versions of these programs are oriented towards assessing the performance of waste disposal sites. Although the PRESTO program listed in Table 1 has a menu interface for use in WIN95, these programs generally require users to be very familiar with the underlying models and with the concepts involved in pathway models. The PRESTO and PATHRAE programs include some of the basic modeling parameters, but generally require the user to provide most of the input data. This family of programs has been used mostly by its developer and U.S. EPA and is not in general use.

The GEN II computer program evolved out of a series of models developed by the Pacific Northwest Laboratory, Richland, Washington. The program has a user interface requiring a detailed knowledge of numerous parameters and is not user-friendly. It requires extensive interpretation of underlying parameters and exposure scenarios.

The National Council on Radiation Protection and Measurements (NCRP) developed a comprehensive catalog of screening values that can be used to estimate radiation doses for a spectrum of pathways and exposure scenarios. The models and screening levels are provided as extensive tabular listings in NCRP Report 123 (NCRP96). The report allows for the assessment of doses from environmental exposure pathways for numerous radionuclides, including TENORM radionuclides.

The NRC has developed extensive models to support its recent rule making on decommissioning and decontamination (D&D) of nuclear facilities. The pathway models and screening levels have been issued as several drafts and interim screening values, and have not been finalized. Screening criteria and the basis models are provided in NUREG 5512 (NRC92).

Training on various pathway models may be available through the DOE National Low-Level Waste Management Program at Idaho National Engineering and Environmental Lab (www. inel.gov/national/national.html) and the computer code developers (see CRCPD web site).

5.5 How do I use the RESRAD computer program for TENORM dose assessments?

Although the basic RESRAD program (Version 5.82, more recently Version 6) does not have the sophistication and flexibility for custom calculations exhibited by the PRESTO, PATHRAE, and GEN II models, it is much more user-friendly. RESRAD (version 5.82, subsequent Version 6 is available on the Argonne National Laboratory Internet Site http://web.ead.anl.gov/resrad) is used as the example tool to discuss the details of performing dose assessments for purposes of complying with TENORM regulations patterned after Part N. However, much of the information is also applicable to other programs. Modelers should confirm that they are using current versions and appropriate models for their assessments.

5.5.1 In general, what information do I need for RESRAD?

You will need to select pathways, scenarios, and modeling parameters for estimating the radiation dose from residual TENORM on a site. The RESRAD program allows you to determine the radiation dose from a broad spectrum of radionuclides, and allows you to "turn on or off" the various environment pathways (e.g., radon in a residence or eating fish from a farm pond). Therefore, the RESRAD program, with appropriate insight and understanding by the modeler, can be used to customize the dose assessment to specific exposure scenarios (e.g., a home built on a contaminated lot without intake of contaminated food or water). The relative significance of some parameters is dependent on the scenarios being included in the dose assessment. For example, food-pathway parameters do not affect the dose if food is not raised on the site. Similarly, the radon modeling parameters have little pertinence if buildings are not being built on a site, or the radon dose is not included in decision criteria.

The proper selection of the exposure scenario, including the basic criteria for characterizing the site, is of foremost importance. If there is residual contamination on the site, an important decision is whether the residual contamination is on the surface, or eventually will be on the surface due to erosion. Some of the alternative considerations related to external gamma dose include:

1. <u>Contamination beneath the surface with surface conditions such that the material will likely remain beneath the surface.</u> In this situation the external gamma radiation will be largely mitigated by shielding from the surface material, and possibly not be significant.

2. Cover with uncontaminated soil. There may be soil with residual contamination on the surface, but constraints on future uses may allow covering the site with a layer of uncontaminated soil. Depending on the specifications for the cover and the longevity of the cover, the external gamma dose and other pathways will be reduced and may be eliminated.

3. Retention of contaminated soil on the surface. The specifications may allow for soil with residual contamination to remain on the surface. Depending on the specifics of the scenario, the external gamma dose may be the primary dose pathway.

Some of the alternative considerations related to dose from use of groundwater include:

1. No use of groundwater: The specified use of the site or availability of groundwater may exclude the use of groundwater as a viable pathway.

2. No well actually located on the site: Due to the characteristics of the site or proposed controls of the site, the closest possible use of groundwater may be at a location outside of the site boundary; e.g., 15 meters away from the site.

3. Well for potable water on a contaminated site: The proposed site uses may include full unrestricted use and the site characteristics may make it viable to place a well for human consumption in the center of the site or at the down-gradient boundary of the site. These two options are the basic scenarios modeled by the RESRAD Pathways code.

Present and future land use restrictions, as agreed with the licensing authority, may exclude residential uses including growing of food crops, and placement of wells for recovery of groundwater on the site. These restrictions, if they are accepted for long-term enforcement, allow excluding the food and groundwater pathways.

5.5.2 What input parameters do I use with RESRAD?

Table 2 identifies the various categories of parameters that may be used as input data. These include parameters for the basic description of the site (area and depth of contamination), geological parameters (thicknesses and characteristics of the geological structure of the site), parameters for transfer of contaminants from TENORM to food, and parameters specifying the uptake through food, drinking water, and inhalation of air. The parameters are organized into categories in the menu, and default values are given for most of them. As noted in Table 2, early versions of RESRAD used default dose parameters from DOE references. With Version 5.61, RESRAD adapted the U. S. EPA dose factors from Federal Guidance Report No.11 (EPA88) as defaults. However, RESRAD, version 5.82 can use user-specific dose parameters, if desired. If default parameters are used exclusively, the only parameters that the user must provide are the radionuclides of concern and the concentrations for these radionuclides. The default parameters in the basic RESRAD code (version 5.82) are generally conservative, and the use of site-specific parameters will generally result in lower, more realistic radiation doses.

In setting up an assessment, one must first decide which pathways are to be included and the time frames for which calculations are to be performed. The available pathways are identified at the bottom of Table 2 and include “external gamma” exposure, “indoor radon” dose, and doses from contamination of groundwater. The groundwater and radon-dose pathways in RESRAD have limited options for customizing assessments, although the radon-dose pathway incorporates many of the features of the Rogers and Associates Engineering Corp. (RAE) radon diffusion codes (Nielson92, Rogers84). The present version of RESRAD offers only two options for calculating the groundwater dose: in the center of the site; or at the down-gradient edge of the site. Supplemental calculations are required to determine the dose at an off-site location. The PRESTO model (PRESTO98) provides more sophisticated radon and groundwater calculations than RESRAD. A RESRAD-groundwater model, which provides more comprehensive treatment of groundwater, allowing direct assessment of off-site locations, has been released since these assessments were performed.

Table 3 identifies selected parameters related to site-specific conditions and scenarios. It provides information on specific parameters which can significantly impact the environmental exposure-pathways modeling and provides some references for obtaining parameter values.

Table 4 provides selected distribution coefficients (K_d), i.e., ratios of concentrations in soil divided by concentrations in water (units of milliliters per gram), used for determining the leaching of contaminants from TENORM residues and for modeling the flow of groundwater. Although there is extensive literature on K_d’s, it is difficult to accurately specify K_d values for materials and sites without performing site specific analyses. K_d values are needed for the contaminated material (residual TENORM), the unsaturated zone, and the saturated zone. A very good general reference for K_d’s is provided by Sheppard (Sheppard90). This reference and additional Sheppard references on K_d’s are listed in the Reference section of this Guidance (Sheppard85 , Sheppard84, Sheppard80). Additional information on K_d’s can be found in the support documents for RESRAD (Yu93). Table 4 provides a range of K_d values including those of Auxier and Associates (Auxier96), which are based on measurements of TENORM from oil and gas production. The American Society for Testing & Materials publishes an empirical method (ASTM84) for determining K_d’s. There are also various leaching procedures used for K_d calculation involving analysis of the leachate. The U.S. EPA TCLP leach procedure (40 CFR 264) is an example of a procedure that can be used to obtain data for K_d’s. The chemistry of the site being modeled should be reconciled with the pH requirements of the TCLP leach test.

5.5.3 What output reports are available from RESRAD?

RESRAD can produce several output reports of which the most useful and concise is the summary report, denoted as “Summary.rpt”. Other reports include the “Concentration Report,” and the “Detailed Report.” The listing of the groups of parameters in the second column of Table 2 is based on the sequence of parameters listed in a typical RESRAD “Summary Report.” The sequence of parameters, examples of typical input parameters (mostly default values), and examples of the dose results for a demonstration run using RESRAD are included as Appendix D, which has a sample “Summary Report.”

5.5.4 What are the results of a typical RESRAD dose assessment?

Table 5 provides the results for an example of a RESRAD dose assessment for residual TENORM on a property. The input parameters used for this assessment are the default parameters from

RESRAD. The assumed depth of residual TENORM is 15 cm, with an average concentration of 0.15 Bq (4 pCi) per gram of Ra-226 and Pb-210, and 0.04 Bq (1 pCi) per gram of Ra-228 above natural background. Options in the RESRAD model include the short half-life decay products. Also, it is assumed that the radioactive decay products are in secular equilibrium with their respective parents (e.g., Ra-226). The environmental scenario is that of a resident farmer. The assessment is for all of the environmental exposure pathways, assuming that the family obtains all of its food from the site. The results for the indoor radon assessment are given on the right-hand side of the Table, and are not included in the totals, since the dose from radon is excluded from the dose specification of the Part N regulations. Although the dose for the groundwater pathway is slightly higher at 500 years, the time frame of 1,000 years is used because many other scenarios produce a higher dose at 1,000 years, and 1000 years is often the longest time used for dose assessment.

Table 6 gives the doses from five assessment scenarios. The totals in the table, both for the doses at 1 year and the doses at 1,000 years are for all of the pathways except indoor radon. Indoor radon dose, although a separate consideration under Part N, is not included in the dose standard contained in N.5a.

<u>Scenario #1</u> is for the base scenario given in Table 5.

<u>Scenario #2</u> is for the same basic scenario with a depth of residual TENORM of 30 cm (1 foot) instead of 15 cm (0.5 foot).

<u>Scenario #3</u>, uses parameters similar to those for the Scenario #2, except that K_d's specific to oil and gas TENORM scale are used (see Table 4). Material specific K_d's are generally higher than defaults, and their use generally gives lower doses than with default K_d's. However, in this case they result in increases in doses for several of the pathways, with the notable exception of the groundwater pathway. This happens because the RESRAD code uses K_d's, which are distribution coefficients, not only to estimate diffusion in groundwater, but also to estimate leaching of the contamination from the source term into the groundwater. With the higher material specific K_d's, there is less removal of the source term by infiltrating precipitation. This results in higher doses than for Scenario #2, which uses "more conservative default parameters." This example illustrates why, for accurate assessments, the user needs more than a casual understanding of the modeling process. What appears to be conservative is not always conservative and the most health protective.

<u>Scenario #4</u> introduces a 1 millimeter (0.04 inch) per year decrease in the depth to the groundwater table. This may represent the historic depletion of the groundwater table, or in the case of remediation of a site, it may represent changes in the water table due to excavations or other changes in site conditions. Incorporating this parameter generally produces a significant decrease in the groundwater related dose. For the parameter values used in this assessment the change is minimal.

<u>Scenario #5</u> introduces a 30-cm (1-foot) layer of clean material over the residual TENORM. This is equivalent to a layer of TENORM 1 foot beneath the surface. The layer of clean material greatly reduces the external gamma dose and the inadvertent soil ingestion dose since the TENORM is not accessible. However, these doses increase with time as the clean material diminishes by surface erosion (assumed to be 1 millimeter [0.04 inch] per year). Proper design and stabilization of the cover material can eliminate erosion, thereby preserving the cover. Assessments of erosion can be performed using the Universal-Soil-Loss Equation and other evaluations (Corbitt99, PRESTO98).

Inspection of the range of results in Table 6 illustrates the impact of varying selected parameters. The interactions between parameters are many and complex, and the impacts of changing parameters are not always self-evident. In dose assessment, conservative assumptions for modeling do not necessarily lead to conservative results. Even a relatively simple model like RESRAD requires a professional understanding of the concepts of the model and interaction of the parameters.

An example of the conservatism that can result from the use of generic input parameters is the impact of using what appears to be reasonable default parameters for infiltration of precipitation. RESRAD calculates the infiltration rate using a water-balance equation at the ground surface. While that equation takes the soil type into account in a general way, it does not consider the ability or inability of the soil to move the water downward from the surface. The downward water movement from the surface is limited to the value of the saturated hydraulic conductivity of those soils. Unfortunately, RESRAD does not limit the water infiltration rate to this parameter value. For sites designed to prevent ponding and for soils with a low permeability (e.g., 10^{-9} m/sec), RESRAD allows more water to move downward from the surface than can often be transmitted through the soil once it leaves the surface. This often results in unrealistically high peak annual doses within the first one thousand years. One can compensate for this aspect of RESRAD by using a site-specific infiltration fraction (fraction of precipitation that infiltrates), rather than the default value. A site-specific infiltration fraction can be calculated using equation E.4 on p.198 of reference Yu93. This overly conservative treatment of infiltration of water has been corrected in the more recent versions of RESRAD (e.g., RESRAD 6).

The dose estimates in Table 5 are generally based on using the RESRAD default parameters for pathway scenarios. As addressed in Section 1.1, the use of reasonable site-specific parameters may result in lower doses. The primary site-specific parameters of concern include the site occupancy times for the presence of critical receptors inside and outside of structures, the depth of the residual contamination, and the specific scenarios applicable to the site. Use of site specific occupancy times for exposures over residual contamination may reduce the dose estimates by a factor of two or more. That is, although the illustrations in Table 5 and Table 6 indicate that potential radiation doses from residual radium concentrations of 5 pCi/g, the Part N exemption level, exceed the license termination criterion of 25 mrem per year, this will not be the case for many sites.

6.0 What radiation measurements are required for complying with Part N?

States adopting TENORM regulations will be faced with a variety of exposure scenarios depending upon the type of material processed and the processes involved. To accommodate this diversity Part N gives states the option of setting criteria for the release of equipment based on screening methodologies. These methods must assure protection of the health and safety of the general public and protection of the environment consistent with existing state regulations.

Appendix A of Part N provides criteria for unrestricted release of equipment. These criteria are basically taken from NRC Regulatory Guide 1.86 and modified for TENORM. Although these criteria were not originally dose based, the radiation dose to the general population from the use of these criteria can be determined from recent standards that have been developed by the Health Physics Society Standards Group for the American National Standards Institute. Due to the limited number of radionuclides of primary concern for TENORM the categories from Regulatory Guide 1.86 have been condensed to provide a single basic criterion of 5,000 dpm per 100 square centimeters for total surface contamination, with the related criteria for maximum values and removable contamination. Whereas, Regulatory Guide 1.86 provides separate categories for uranium (with its decay products present) and radium-226 (with its decay products present), due to the relative number of alpha and beta decay products (e.g., fourteen decay products for uranium and nine decay products for radium-226) for both uranium and radium, for simplicity a single category is used in Part N. The relative ratios of the individual alpha and beta decay products (excluding decay products with low beta energies that are difficult to detect) are similar. The radiation dose assessments performed for ANSI 13-12 (ANSI99) indicate that the potential doses associated with the criteria of Appendix A are about 10 microsievert per year (1 mrem per year), or under some circumstances may be conservatively as much as 50 microsievert per year (5 mrem per year).

Part N establishes surface contamination criteria for alpha contamination and separate criteria for beta/gamma contamination. When determining which criterion applies, there must first be a determination as to which radionuclides are involved with the process. For example, in gas production the gas flow lines and separators may only be contaminated with radon progeny that decay to the longer half-life lead-210. Lead-210 is a beta emitter requiring that beta sensitive equipment be used to determine the surface contamination. In operations where scale deposits from water circulation are a problem, the contaminants may include radium and radium progeny. The person responsible for operations where TENORM is accumulated must understand the chemical and physical characteristics of the particular radionuclides involved with the materials and processes, where they are likely to accumulate, and how to properly evaluate resulting radiation hazards. This section discusses the radioactive elements and the selection of equipment that should be used to detect and/or measure the radioactive constituents.

6.1 What instruments are available for conducting radiation measurements?

Alpha detectors and beta/gamma detectors are used in the evaluation of TENORM contamination. Several types of alpha detectors are available. The most popular are the gas filled detector, the gas flow detector and the silver activated zinc sulfide scintillation detector. The simplest detector to use is the zinc sulfide scintillation detector. The radiation sensitive area of this instrument is a mylar foil externally coated with aluminum to exclude light, and internally coated with a thin layer of silver activated zinc sulfide that faces a photomultiplier tube. Alpha particles can pass through the foil and stimulate the zinc sulfide to emit photons of light that interact with the photomultiplier tube producing an electrical pulse that may be registered as a count. As this type of instrument counts approximately 30% of incident alpha particles, it has a 30% “detection efficiency”.

The gas flow and gas filled detectors operate on the same principle, ionization of the gas by alpha particles. Some of the gas filled detectors must have the gas replenished by purging and refilling of the active volume of the detector. The gas flow detector has a gas cylinder attached, which provides a continuous flow of gas through the detector at a regulated pressure, so this apparatus is not as mobile as the two previously mentioned detectors.

Several types of beta/gamma detectors are available. When measuring beta/gamma, efficiencies for these types of instruments are generally in the range of 25%. However, the efficiency for gamma detection alone is generally less than one percent.

Another popular gamma detector is the sodium iodide crystal, a scintillation detector. Sodium iodide crystals come in different sizes referred to as 1 by 1, 2 by 2, etc. The numbers refer to the diameter and length of the crystal in inches. The larger the crystal, the higher the efficiency for higher energy photon gamma and x-ray emissions. These detectors only detect photons. The high-energy sodium iodide detectors are covered with a metal cap, usually aluminum, that attenuates the alpha and beta particles before they reach the crystal. A low energy gamma probe using sodium iodide is available. This detector has a thin wafer crystal with an end window made of mylar. The mylar allows low energy photons to enter the detector through the end window. The thin wafer crystal has a relatively high efficiency for lower energy photons. Conversely, it has a relatively low efficiency for high-energy photons. When using the low energy sodium iodide detector, the surveyor must be aware that the detector will also detect alpha and beta particles. Due to the thin mylar window, alpha and/or beta particles can enter the active volume of the detector, give up their energy in the crystal, and emit photons.

The manufacturer's literature provides approximate values of an instrument's radiation detection efficiency for each radiation type. These values serve for rough survey work; but, for measurements relative to regulatory limits, each instrument must be calibrated to a known radiation source traceable to a standard certified by the National Institute of Standards and Technology (NIST). Persons unfamiliar with radiation detection instruments should consult radiation professionals before selecting instruments.

6.2 What are the procedures for releasing equipment for unrestricted use?

Equipment released for unrestricted use must meet the levels of contamination indicated in Appendix A of Part N. Alpha contamination should be measured using a detector that has an active surface area of 100 square centimeters. If a detector with a smaller surface area is used, the surveyor needs several measurements to determine if the maximum contamination level is exceeded. If the total contamination indicated within any 100 square centimeter area exceeds 83 Bq [5,000 disintegrations per minute (dpm)], the surveyor must determine if the average contamination over a square meter exceeds the 83 Bq (5000 dpm) criterion. If the level of contamination is greater than 83 Bq (5,000 dpm) per 100 square centimeters after averaging the contamination over a square meter, the equipment may not be released for unrestricted use without decontaminating to below the specified criteria. If any single 100 square centimeter area exceeds 250 Bq (15,000 dpm), the equipment may not be released for unrestricted use.

When using survey equipment, the readings should be acquired at the closest point to the contamination. The surveyor should be aware that windows on gas filled, as well as scintillation, probes can be easily ruptured. A tear in the mylar film window of a scintillation detector allows stray light to enter the probe causing pulses to be generated in the photomultiplier tube. A tear in the mylar film of a gas filled detector allows gas to escape causing the detector to cease acquiring information. The presence of a magnetic field poses another problem when using a scintillation detector because the photomultiplication and associated count rate can be affected. This can occur when surveying drill stem that has become slightly magnetized from the vibration and rotation of the drill stem during the drilling process.

As described in Appendix A to Part N, a wipe sample is collected for evaluation of removable contamination. Generally, the wipe is submitted to a laboratory for analysis; however, the wipe analysis may be performed on site if the analytical instrument used is of laboratory quality. Analytical control samples must be part of the quality assurance program to assure that the instrument and procedures are precise and accurate. The analytical procedures must include calibration of the equipment with known radiation sources that are traceable to standards certified by the NIST. Operational checks must be performed with each day of use to verify that calibration is within control boundaries. Duplicate samples and blind standards must be analyzed along with the routine samples to assure that reproducible and accurate results are being obtained. Quality assurance data must be plotted and remedial action taken when controls are not within the limits of variation established for the analytical procedure. For release of equipment, wipe analyses must verify that removable contamination is less than 17 Bq (1,000 dpm) per 100 square centimeters for gross alpha and 17 Bq (1000 dpm) per 100 square centimeters for gross beta and gamma.

As an alternative to the above procedure for release of equipment, a state may adopt a screening procedure for release of equipment. Generally screening limits will be established based on exposure levels measured in micrograys (µGy) or microroentgen (µR) per hour at the surface of the equipment. It is more difficult to adequately screen equipment that is internally contaminated since the activity may be either removable or fixed, inside the equipment, and not easily accessible. Many µGy (µR) per hour instruments use sodium iodide crystals for which the radiation detection efficiency varies with the radiation energy. The instrument used to verify compliance with screening limits should be calibrated to the radiation energies that are being measured. The screening method should, within reason, assure that the equipment is adequately characterized. Should any portion of the equipment exceed the screening level, the equipment cannot be released unless a wipe sample analysis and surface survey of the equipment indicates that the limits specified in Appendix A to Part N are met. Appendix C contains information on release criteria adopted by various states.

Conditional release based on screening of equipment is an alternative that some regulatory jurisdictions may wish to consider. Screening methods may not clearly determine whether the concentration of contaminants contained within the equipment, e.g., pumps or pipe, meet the exemption level specified in N.4. Such factors as inconsistent geometry, uneven scale thickness and uneven wall thickness make it difficult to relate a dose rate to a concentration of contaminant. As a result, some regulatory jurisdictions may be reluctant to release equipment for unrestricted use based on screening measurements. Also, some jurisdictions may wish to consider requests to use various screening levels dependent upon the intended disposition of the equipment. For instance, pipe could be conditionally released for such purposes as smelting, construction of fences or other use that will not result in an exposure to the public that exceeds 1 mSv (100 mrem) and reasonable application of ALARA under N.5.

N.7c. provides for conditional release for metal recycle based on a screening level of 50 μR/hr (microroentgen per hour). The screening level of 50 μR/hr includes natural background. N.7c denotes that the screening level is not to be used for processing or use of materials in a manner that constitutes disposal, without approval of the Agency.

6.3 What are the procedures for the release of facilities for unrestricted use?

Released facilities refer to buildings, other structures, and building rubble that are to be left in place, released for unrestricted use or disposed of at an industrial or municipal landfill.

When preparing a survey of a building for potential release, divide the inside and outside walls, and the floors and roof of the building into one-meter grid squares identifying each square with a reference code. Make a historical review of the use of the building to determine the most likely areas of contamination. With an appropriate survey instrument, measure the contamination levels of a minimum of ten percent of the grid squares with special attention to areas such as TENORM storage areas, used equipment storage areas, equipment cleaning areas and septic systems. Evaluate each area that has an elevated measurement for compliance with Appendix A to Part N in accordance with the following. If the total contamination is less than 17 Bq (1,000 dpm) per 100 square centimeters, a wipe sample analysis is not required. However, for compliance with Appendix A of Part N, any surface contamination exceeding 17 Bq (1,000 dpm) per 100 square centimeters must be evaluated to determine if the contamination is removable. Should the survey indicate that greater than 10% of the grids surveyed are above the criteria for release, a more thorough survey is required.

Survey concrete slabs using a grid pattern as previously described. Give special attention to cracks and joints where contamination may have a conduit to the soil beneath the slab. Should a determination be made that contamination has accumulated in cracks posing the potential for contamination of the surface or subsurface soil, core samples may be required to show compliance with the regulations.

6.4 What are the procedures for release of open land for unrestricted use?

A general or specific licensee responsible for land known or suspected to be TENORM-contaminated must follow and document compliance with applicable procedures established by the regulatory agency before land may be released for unrestricted use. The licensee should perform a review of historical use of the land to determine areas that could be affected by TENORM. For areas greater than one acre, the licensee should perform a survey that is statistically defensible. For guidance in performing large open land surveys, the licensee may refer to the *Multi-Agency Radiation Survey and Site Investigation Manual* (MARSSIM00). For areas less than one acre, the licensee should grid the area in no more than 100 square meter sample areas with not less than five meters on any one side.

The determination of how many soil samples to collect and where to collect them should only be made after conducting an instrument survey and a review of the historical use of the land. Since it is difficult to determine actual concentrations of a contaminant in the soil based on instrument surveys, a correlation study should be undertaken. Soil samples from several areas should be analyzed and compared with instrument readings for those areas to determine at what instrument reading all samples are below the release criterion. Instrument readings above this level can then be used to identify areas in need of soil analysis. For areas requiring soil analyses it is impractical to analyze the entire volume of the sampling area, 100 square meter by 15 centimeters deep. Therefore, for any area that has elevated readings, a representative sampling of the 100 square meter area must be performed and analyzed. The individual samples collected from the sampling area may be commingled prior to analysis or they may be analyzed separately and averaged to determine the average concentration.

Using the results of the survey described above, the licensee must estimate an annual total effective dose equivalent (TEDE) to the reasonably maximally exposed individual should the land be released for unrestricted use. Dose modeling for this purpose is discussed in Section 5 of this document. The licensee is responsible for assuring that the average member of the critical group is unlikely to receive a TEDE greater than the criteria established by the regulatory authority.

6.5 What are the requirements for documentation of surveys and sample analyses, and what must be submitted for release concurrence?

All surveys for releasing equipment, facilities, and land must be documented. The documentation should include: The exact location of the survey samples and measurements; instrument readings; identification of the individual performing the survey and the survey instruments; and, date the survey was performed. Documentation of each sample should include: The date and time of collection; identification of the individual collecting the sample; location of sampling (for soil samples include depth of sample); and, the results of sample analyses. The use of chain of custody procedures should be considered.

The regulatory authority may require that the licensee notify the authority of any proposed release of equipment, facilities, and/or land for unrestricted use and receive the authority's concurrence prior to release. This notification should include copies of all documentation supporting the proposal. The licensee should maintain the documentation until authorization to dispose of the documentation is granted.

7.0 Financial Assurance

Under what circumstances should someone possessing TENORM have to provide financial assurance? The following does not address financial assurance that might be required of someone who distributes products containing TENORM; rather, financial assurance that may be required of licensees who possess TENORM is discussed.

Authority to require provision of financial assurance is predicated on the authority to require a license. An entity required by regulations modeled on Part N, or by regulations promulgated in conformance with another Part (for example, a manufacturer licensed under Part C) to obtain and maintain a license may be required to maintain financial assurance as a prerequisite for the license. A 'license' is an authorization to do something. The regulations provide for general and specific licenses. The regulation could have been drafted to include a requirement for demonstration of financial assurance as a precondition for acquiring coverage under a general license. However, since the general license is unilaterally imposed on anyone who possesses TENORM without any precondition for notice or request or election, it is doubtful that financial assurance can be required of general licensees. If an Agency requires general licensees to provide a notice of intent and or register (see Section 3.2 and optional item N.10d.), the Agency may also be able to require financial assurance.

Specific licenses are required for manufacture of products containing TENORM, decontamination of equipment or land, or receipt of TENORM for storage, treatment, or disposal. With the proper regulatory authority, any applicant for a specific license for any of these activities can be required to provide proof of financial assurance in such form and amount as the licensing agency deems appropriate.

Examples of frameworks for financial assurance include Part S of the SSRCR and the following provisions of 40 CFR Part 264.143 (RCRA):

> (a) Coverage for sudden accidental occurrences. An owner or operator of a hazardous waste treatment, storage, or disposal facility, ... must demonstrate financial

> responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator must have and maintain liability coverage for sudden accidental occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million, exclusive of legal defense costs. This liability coverage may be demonstrated as specified in paragraphs (a) (1), (2), (3), (4), (5), or (6) of this section:
> (1) An owner or operator may demonstrate the required liability coverage by having liability insurance as specified in this paragraph.
> (i) Each insurance policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in § 264.151(i). The wording of the certificate of insurance must be identical to the wording specified in § 264.151(j). ...
> (2) An owner or operator may meet the requirements of this section by passing a financial test or using the guarantee for liability coverage as specified in paragraphs (f) and (g) of this section.
> (3) An owner or operator may meet the requirements of this section by obtaining a letter of credit for liability coverage as specified in paragraph (h) of this section.
> (4) An owner or operator may meet the requirements of this section by obtaining a surety bond for liability coverage as specified in paragraph (i) of this section.
> (5) An owner or operator may meet the requirements of this section by obtaining a trust fund for liability coverage as specified in paragraph (j) of this section.
> (6) An owner or operator may demonstrate the required liability coverage through the use of combinations of insurance, financial test, guarantee, letter of credit, surety bond, and trust fund, ...

Other sections specify the amount of financial assurance required for closure and for post-closure maintenance and monitoring. These regulations also spell out, in great detail, the form and content of the various financial instruments that may be used to satisfy the requirement.

To put this in perspective, U.S. EPA designed the RCRA land disposal regulations to ensure that there would be a “reasonable degree of certainty” that a land disposal unit would not allow migration of hazardous constituents through the final barrier during the post-closure period. The post-closure period is defined as 30 years, unless the licensee can demonstrate that a lesser period is equally protective, 40 CFR Part 264.117(a). The choice of a 30-year period for post-closure monitoring is not based on a technical determination that the wastes in question will decay away; it is more a policy decision that in 30 years we will know more about the behavior of the disposal facility and the fate of the contaminants, and that 30 years, compared to the span of social and political institutions, is a period of time over which control can reasonably be assured and after which the situation can be reevaluated.

Inasmuch as the effective half-lives of most TENORM radionuclides are long compared to 30 years, the same considerations should be applied to a choice of post-closure monitoring. Most TENORM radionuclides will not decay away; however, the behavior of the facility should be better understood and the potential for eventual exposure to the radioactive constituents should be better defined after 30 years. Requirements for financial assurance and the amount of assurance should consider the concentrations of radioactivity and the chemical and physical form of TENORM.

8.0 Matters for Future Consideration

In preparing Part N and this Implementation Guidance several matters and comments have come up that were not fully resolved at this time or are more appropriately being held for future consideration. These include:

1. TENORM Definition In letters dated April 2001 and May 3, 2002, the EPA recommended that the National Academy of Sciences (NAS) TENORM definition be adopted in Part N to address those circumstances where exposure risk to TENORM is increased without radionuclide concentration increasing. The NAS definition of TENORM is very broad, and could include trivial situations, such as plowing a field, or the use of granite in countertops. With the additional experience that the states will gain in the regulation of TENORM using the model rule and any additional TENORM studies that may be conducted, the definition of TENORM and EPA's comments should be reexamined during the next revision of Part N.

2. Release of Solid Materials (Clearance) and Conditional Release The NRC staff, as directed by the Commission, is currently proceeding with enhanced participatory rulemaking on the control of solid materials. The CRCPD Directors, through a resolution, recommended that NRC move forward with the rulemaking process by developing national standards for the control of solid materials and that the technical bases developed by NRC include considerations of naturally-occurring and accelerator-produced radioactive material and TENORM. The EPA and DOE are also currently working on developing standards for the release of solid materials. In addition to federal agencies, the National Council on Radiation Protection and Measurements (NCRP), is preparing a report with recommendations on alternatives for disposition and possible recycling of solid material. In this revision of Part N, the SR-N Committee only addressed the conditional release of metal for recycle of equipment contaminated with a maximum exposure level of 50 microroentgen per hour including background. However, with the additional information that should be forthcoming from these current studies by federal agencies and other organizations, the release of solid materials should be reexamined during the next revision of Part N.

3. Disposal of TENORM and Termination of Licenses The EPA expressed concerns that the provisions in N.8a. addressing the disposal of TENORM were not adequate for the protection of groundwater. This concern was addressed by stating that SR-5 believed that the 25 millirem per year all pathways criterion is protective of the environment with an adequate margin of safety. CRCPD Part N drafters believe that TENORM contamination of groundwater is very unlikely with the exception of uranium mining, rare earth metals extraction industries, or a few other metals mining and extraction industries where NORM is known to exist in significant concentrations (e.g., copper). These types of industries are currently subject to existing federal and state statues that address the protection of groundwater. However, this issue should be considered a matter for future consideration.

4. Table of Doses The Table of Doses and the dose terminology in N.22c.iii.(12) and N.23b. were revised to include the present terminology used in Part D and 10 CFR Part 20.

5. Concentration Limits Concentrations limit for other radionuclides should be developed for N.4 (Exemptions) and N.10b. (General License).

6. Regulatory Guidance A regulatory guide identifying the procedures for obtaining Agency approval as specified in N.10e.ii. for the transfer of material, equipment or real property not made in accordance with N.10e.i. should be developed.

7. Appendix A When NRC and the Agreement States adopt a dose based criteria for acceptable levels of surface contamination, Appendix A should be replaced using similar criteria. (e.g., ANSI/HPS N13.12-1999 *Surface and Volume Radioactivity Standards for Clearance*)

8. RSO Requirements Additional provisions to N.21 and N.22 should be considered to address RSO requirements and responsibilities consistent with anticipated changes to Part C.

Appendix A: Figures and Tables

Figure 1. Environmental Transport Pathways

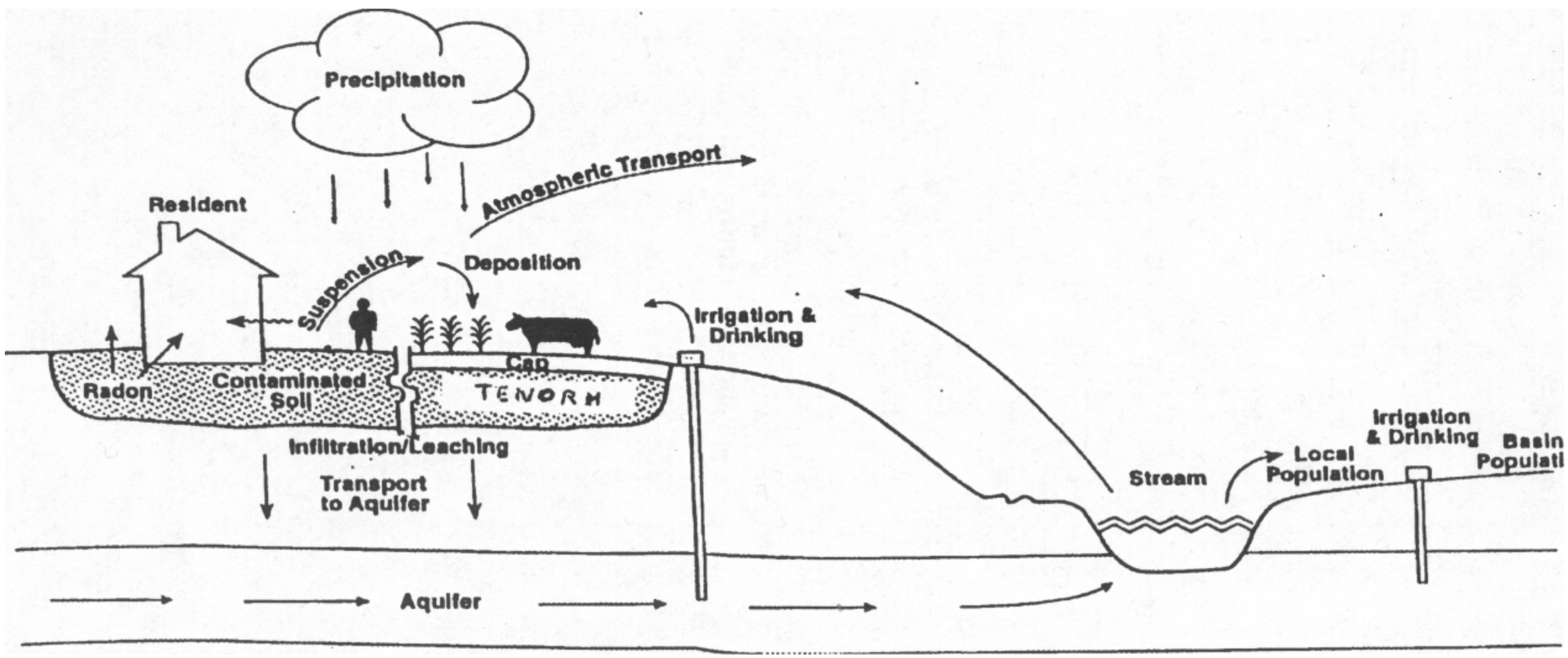

Table 1. Selected Models for Assessing the Radiation Exposure from Residual Radioactivity

Name of Model	Developer of Model	Basic Application of Model	Comment on Model
RESRAD (RESRAD93)	Argonne National Laboratory, for the DOE	People living on contaminated sites. Models numerous pathways.	DOS or Win95 Menu driven, relatively user friendly and easy to use. User should understand pathway models.
RESRAD-Build (RESRAD94)	Argonne National Laboratory, for the DOE	Personnel occupying buildings contaminated with residual radioactivity.	DOS menu driven, relatively user friendly, harder to use than RESRAD.
PRESTO (Presto98)	Rogers and Associates Engineering for U.S. EPA	People living on contaminated sites. Models numerous pathways.	Win95 menu driven, but requires knowledgeable person. Relatively hard to use.
PATHRAE (EPA87)	Rogers and Associates Engineering for U.S. EPA	People living on contaminated sites. Models numerous pathways	Not menu driven. Requires knowledgeable person with insight.
GEN II	Pacific Northwest Laboratory	People living on contaminated sites. Models numerous pathways	Not menu driven, relatively hard to use. Many options, sometimes hard to interpret the definition of scenarios and the results.
NCRP Report No. 123 (NCRP96)	Prepared by a committee of the National Council on Radiation Protection and Measurements (NCRP96)	People living on contaminated sites. Models numerous pathways.	Parameters and results published in tables, allowing extraction of values to perform assessments.
NRC NUREG 5512 (NRC92)	Prepared for NRC	People living on contaminated sites. Models numerous pathways.	Tends towards using default values and providing very conservative results.
MicroShield (Grove93)	Grove Engineering	External gamma dose for various source geometries and exposure geometries.	Commercial model, versions available for DOS and WIN95, relatively easy to use.

Table 2. Summary of Parameters Used in RESRAD

Menu Identifier	Source or Description of Factor	Reference	Comment
B-1	Dose Conv. Factors, Inhalation	Fed Guidance 11	Previous versions used DOE factors, current versions use Fed Guide 11. Users can develop case specific results.
D-1	Dose Conv. Factors, Ingestion	Fed Guidance 11	Previous versions used DOE factors, current versions use Fed Guide 11.
D-34	Food transfer factors	RESRAD default	Generally conservative, factors for soil to humans via food chain. Users can develop case specific results.
D-5	Fresh water bioaccumulation factors	RESRAD default	
R011	Site characterization parameters	Default/site specific	Default values given, can provide site specific data
RO12	Specification of radionuclides & conc.		
R013	Site characterization parameters	Default/site specific	Default values given, can provide site specific data
RO14	Groundwater site parameters	Default/site specific	Default values given, can provide site specific data
R015	Groundwater parameters, unsat zone	Default/site specific	Default values given, can provide site specific data
R016	Distribution coefficients; K_d	Default/site specific	Default values given, generally conservative, select site specific when possible
R017	Inhalation pathway parameters	Default/site specific	Default values given, generally conservative, select site specific when possible
	Site size parameters	Default/site specific	Default values given, used to modify pathway doses, based on size of site
R018	Food consumption and intake param	Default values given	Default values given, can change to U.S. EPA or site specific.
R019	Livestock pathway parameters	Default values given	
	Depth of mixing layer and root depth	Default values given	Important to use site specific parameters for root depth.
	Drinking water and water use param.	Default values given	
R19B	Food pathway parameters	Default values given	
C14	C-14 modeling parameters	Default values given	Not pertinent to TENORM
STOR	Storage times for food products	Default values given	Generally not pertinent to TENORM
R021	Radon pathway parameters	Default values given	

Additional input decisions:

Time increments for calculating doses and maximum time to which doses will be calculated; recommend maximum of 1,000 years.

Which pathways are included in calculations:

- a External gamma
- b Inhalation
- c Radon/indoor
- d Food, vegetables, fruits, meat and milk
- e Water dependent pathways (Drinking water/well water & Fish)

Table 3. Specific Parameters for Site Specific Conditions

Menu Identifier	Parameter	Alternate References	Comment
	Parameters Specifying the Depth Distribution of Residual TENORM or Site Contamination		
R011	Thickness of contaminated zone		Thickness of zone effects external gamma dose, depth of material for root uptake, and radon emission.
R013	Thickness of cover		A cover of 15 cm significantly reduces the external gamma. A concern is longevity of the cover.
R013	Cover depth erosion rate		Proper design of the cover can minimize erosion. The default parameter erodes a 1 m cover in 1000 years.
		Universal soil loss	Assessments can be performed for site-specific parameters using the Universal-Soil-Loss Equation.
	Erosion rate for contaminated material	equation, Corbitt99	The default value results in elimination of the source TENORM over time; should be assessed.
	Parameters of Special Concern related to Groundwater		
R011,13,14	Parameters defining dimensions related to the site	Site measurements	These parameters can generally be measured as physical dimensions or conservative assumptions made.
R014	Water table drop rate	7th value in R014	This is an extremely important parameter. It is used to adjust to changes in the depth of the water table. The water table can be modeled to drop faster than material is transported in groundwater, resulting in contamination not reaching the groundwater.
R016	Distribution coefficients; Kd	Default/site specific	Default values given, generally conservative, select site specific when possible. Separate values for contaminated zone and for neutral zone.
		ASTM84, Sheppard90 Sheppard85,84,80; Y93	See Table 4 and related text.
R013	Precipitation parameters	Meteorological refs Mathe 64	The precipitation rate and fraction infiltrating the surface determine the source term of water infiltrating the site.

Food Pathway Parameters and Ingestion

D-34	Food transfer factors	RESRAD default Yu93, Oztunali84, EPA91	Generally conservative, factors for soil to humans via food chain. Default values can be modified to correspond to Kds.
R011	Site dimensions		Determine the amount of food that can be raised on a site and the viability of the resident-farmer scenario.
R018	Soil Ingestion, #7 of R018	EPA 91	One of the ingestion pathways is accidental soil ingestion, which can be characterized as the "dirty hands" scenario.
R018	Food consumption and intake parameter	Default values given	Default values given, can change to U.S. EPA or site specific.

Inhalation of Airborne Material

R017		EPA88, Yu93	RESRAD uses a mass loading resuspension concept which is very conservative. The code specifies an airborne concentration of 100 micrograms per cubic meter of contaminated soil. U.S. EPA ambient air standards specify an annual average of about 60 micrograms per cubic meter, and all of the material would not have originated from the site.

Indoor Radon

RQ21	Radon emanating power	Material/site specific Rogers84, Nielson92	Fraction of radon released from material to pore space, material specific.
RQ21	Design of Buildings	Site specific	Contact of building with contaminated soil and building design.
RQ21	Building ventilation rate	Site specific	Air exchange rate of building

Table 4. Alternative K_d Values

K_d's in Units of ml/gram							
Reference	Material	U	Th	Ra	Pb	Pa	Ac
Sheppard, H.P., Jr	Sand	35	3200	500	270	550	450
Oct 90 59/4,p471	Loss	15	3300	36000	16000	1800	150
	Clay	1600	5800	9100	550	2700	2400
	Organic	410	89000	2400	22000	6600	5400
Geometric Mean, Sand & Clay	Average	237	4308	2133	385	1219	1039
RESRAD V 5.61 Default		50	60000	70	100	50	20
Example of Site Specific; Clay		900	110000	94000			
Auxier96 Oil & Gas NORM Waste							
Soil contaminated with NORM				6000	5600		
Scale from Pipe				79000	72000		

Table 5. RESRAD Assessment of Residual TENORM for a Resident Farmer

Dose Per Year At 1 Year After Placement of Radioactive Contaminant							
Nuclide	pCi/g	Ext Gam mrem	Ingestion mrem	Inhalation mrem	Total Dose At 1 Year mrem	1000 yr Water mrem	Radon At 1 yr mrem
Ra-226	4	21.8	3.7	0.002	25	4	100
Pb-210	4	0.01	5.4	0.003	5	0	0.0
Ra-228	1	7.5	1.7	0.01	9	0	0.3
Total		29	11	0.01	40	4	101

Notes: Default parameters
15-cm depth of TENORM; 1 pCi/g of Ra-228 and 4 pCi/g of Ra-226

Table 6. Comparison of Doses from Selected Scenarios

Scenario	Characteristics of Scenario	Doses At 1 Year After Placement of Materials (mrem/yr)						Doses At 1,000 Year After Placement of Materials (mrem/yr)					
		External Gamma	Inadvert Soil Ingestion	Food Ingestion	Indoor Radon	Ground Water	No Radon Total	External Gamma	Inadvert Soil Ingestion	Food Ingestion	Indoor Radon	Ground Water	No Radon Total
#1	Default Parameters, 15 cm depth of contamination	29.3	1.0	9	100	0.0	40	0.0	0.0	0.0	0	4.1	4
#2	Default Parameters, 30 cm depth of contamination	33.4	1.0	17	148	0.0	52	0.0	0.0	0.0	0	7.9	8
#3	Material Specific Kd's 30 cm depth, no cover	33.9	1.0	18	150	0.0	53	13.0	0.5	5.9	66	0.7	20
#4	Material Specific Kd's 30 cm depth, no cover 0.001 m/yr decrease in water table	33.9	1.0	18	150	0.0	53	13.0	0.5	5.9	66	0.6	20
#5	Material Specific Kd's 30 cm depth, 30 cm cover	0.8	0	17	150	0	18	13.3	0.5	6.8	71	0.7	21

Appendix B: References and Information Sources

General References

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NCRP93 *Limitation of Exposure to Ionizing Radiation.* National Council on Radiation Protection and Measurements, NCRP Report No. 116, March 31, 1993.

NRC99 Committee on Evaluation of EPA Guidelines for Exposure to NORM, National Research Council. *Evaluation of Guidelines for Exposure to Technologically Enhanced Naturally Occurring Radioactive Materials*. 1999.

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USEPA96-1 *Technology Screening Guide for Radioactively Contaminated Sites EPA/402-R-96-017*. November 1996. Office of Radiation and Indoor Air (6601J), U.S. Environmental Protection Agency.

USEPA96-2 *Radiation Exposure and Risks Assessment Manual (RERAM) EPA/402-R-96-016 Stabilization/Solidification Processes for Mixed Waste, EPA/402-R-96-014.* June 1996. , Office of Radiation and Indoor Air (6601J), U.S. Environmental Protection Agency.

USEPA96-3 *Documenting Ground Water Modeling at Sites Contaminated with Radioactive Substances EPA/540-R-96-003*. January 1996. Office of Radiation and Indoor Air (6601J), U.S. Environmental Protection Agency.

USEPA96-4 *Three Multimedia Models Used at Hazardous and Radioactive Waste Sites EPA/540-R-96-004*. January 1996. Office of Radiation and Indoor Air (6601J), U.S. Environmental Protection Agency.

CRCPD94-1 *CRCPD Recognition of Licensing States for the Regulation and Control of NARM. CRCPD Publication 94-8.* August 1994. Conference of Radiation Control Program Directors, Inc., Frankfort, KY.

USEPA94 *A Technical Guide to Ground Water Model Selection at Sites Contaminated with Radioactive Substances EPA/402-R-94-012.* June 1994. Office of Radiation and Indoor Air (6601J), U.S. Environmental Protection Agency,

CRCPD94-2 *Report of the E-4 Committee on NORM Contamination and Decontamination/Decommissioning, Report 3. CRCPD Publication 94-6*. April 1994. Conference of Radiation Control Program Directors, Inc., Frankfort, KY

USEPA93-1 *Incineration of Low-Level Radioactive and Mixed Wastes: Waste Handling and Operational Issues* EPA/402-R-93-012. April 1993 Office of Radiation and Indoor Air (6601J), U.S. Environmental Protection Agency.

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USEPA90 *Assessment of Technologies for the Remediation of Radioactively Contaminated Superfund Sites* EPA/540/2-90/001. January 1990. Office of Radiation and Indoor Air (6601J), U.S. Environmental Protection Agency.

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NCRP96 National Council Radiation Protection and Measurements, *Screening Models for Releases of Radionuclides to Atmosphere, Surface, Water, and Ground*, NCRP Report No. 123 (2 volumes), 1996.

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USEPA88 U.S. Environmental Protection Agency, *Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion*, Federal Guidance Report 11. 1988. Authored by Eckerman, K.F., A.B. Wolbarst, and A.C.B. Richardson, EPA-520/1-88-020.

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Information Sources

Regulations:

Summaries of state and federal regulations on NORM, including radiation and radioactivity limits for release of materials, are published by Peter Gray in his quarterly newsletter, *The NORM Report* Ph. 501/646-5142 (CRCPD does not compile regulations.)

A summary of radioactive waste acceptance criteria is available on the U.S. DOE National Low-Level Waste Management Program web site, www.inel.gov/national/ national.html .

A glossary of terms used in the regulation of TENORM and other radioactive material is available from CRCPD.

Available on the CRCPD web site, www.crcpd.org:

Summary of CRCPD assistance with unwanted radioactive material.

"Dealing with Discovered Radioactive Material" a 1 page overview

"Notes on the Scope and Use of the DOT Exemptions, E10656 & 11406" for moving scrap or trash, shipment approval forms, and telephone directory of radiation control program staff who issue shipment approvals.

List of publications, with ordering capability.

Radiation control program telephone numbers, accessed through a map on the web site.

Directory of commercial services for site inspection, decon and waste disposal: “Radioactive Waste Brokers” for small jobs, and “Providers of Radioactive Site Investigation and Decontamination” for larger jobs.

A directory of commercial laboratories for assay of radioactivity in samples of materials.

Manufacturers of portal radiation monitors, and portable equipment. Most manufacturers provide installation, training and calibration services

Directory of developers of computer codes for radiation dose from residual radioactivity. These companies provide training and assistance.

Information on radioactive waste disposal facilities.

Appendix C: Screening Limits Adopted by Various States for Release of Contaminated Equipment

State	Screening Level (µR/hr)	Comments
Georgia	50	Includes background
Louisiana	50	Includes background
Mississippi	25	Above background
New Mexico	50	Includes background
South Carolina	50	Includes Background
Texas	50	Includes Background

Source: The NORM Report, May 1999 (See Reference GRAY99

Appendix D:

Example of a RESRAD Run for TENORM

Using: Default parameters
15 cm depth of TENORM
Constant depth of water table

```
RESRAD, Version 5.82     T½ Limit = 0.5 year                    05/07/99  19:01    Page   1
Summary : RESRAD CRCPD Part N--Example                                          File: Site1.RAD
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Table of Contents

Part I: Mixture Sums and Single Radionuclide Guidelines

Dose Conversion Factor (and Related) Parameter Summary
File: DOSFAC.BIN

Menu	Parameter	Current Value	Default	Parameter Name
B-1	Dose conversion factors for inhalation, mrem/pCi:			
B-1	Pb-210+D	2.320E-02	2.320E-02	DCF2(1)
B-1	Ra-226+D	8.600E-03	8.600E-03	DCF2(2)
B-1	Ra-228+D	5.080E-03	5.080E-03	DCF2(3)
B-1	Th-228+D	3.450E-01	3.450E-01	DCF2(4)
D-1	Dose conversion factors for ingestion, mrem/pCi:			
D-1	Pb-210+D	7.270E-03	7.270E-03	DCF3(1)
D-1	Ra-226+D	1.330E-03	1.330E-03	DCF3(2)
D-1	Ra-228+D	1.440E-03	1.440E-03	DCF3(3)
D-1	Th-228+D	8.080E-04	8.080E-04	DCF3(4)
D-34	Food transfer factors:			
D-34	Pb-210+D , plant/soil concentration ratio, dimensionless	1.000E-02	1.000E-02	RTF(1,1)
D-34	Pb-210+D , beef/livestock-intake ratio, (pCi/kg)/(pCi/d)	8.000E-04	8.000E-04	RTF(1,2)
D-34	Pb-210+D , milk/livestock-intake ratio, (pCi/L)/(pCi/d)	3.000E-04	3.000E-04	RTF(1,3)
D-34				
D-34	Ra-226+D , plant/soil concentration ratio, dimensionless	4.000E-02	4.000E-02	RTF(2,1)
D-34	Ra-226+D , beef/livestock-intake ratio, (pCi/kg)/(pCi/d)	1.000E-03	1.000E-03	RTF(2,2)
D-34	Ra-226+D , milk/livestock-intake ratio, (pCi/L)/(pCi/d)	1.000E-03	1.000E-03	RTF(2,3)
D-34				
D-34	Ra-228+D , plant/soil concentration ratio, dimensionless	4.000E-02	4.000E-02	RTF(3,1)
D-34	Ra-228+D , beef/livestock-intake ratio, (pCi/kg)/(pCi/d)	1.000E-03	1.000E-03	RTF(3,2)
D-34	Ra-228+D , milk/livestock-intake ratio, (pCi/L)/(pCi/d)	1.000E-03	1.000E-03	RTF(3,3)
D-34				
D-34	Th-228+D , plant/soil concentration ratio, dimensionless	1.000E-03	1.000E-03	RTF(4,1)
D-34	Th-228+D , beef/livestock-intake ratio, (pCi/kg)/(pCi/d)	1.000E-04	1.000E-04	RTF(4,2)
D-34	Th-228+D , milk/livestock-intake ratio, (pCi/L)/(pCi/d)	5.000E-06	5.000E-06	RTF(4,3)
D-5	Bioaccumulation factors, fresh water, L/kg:			
D-5	Pb-210+D , fish	3.000E+02	3.000E+02	BIOFAC(1,1)
D-5	Pb-210+D , crustacea and mollusks	1.000E+02	1.000E+02	BIOFAC(1,2)
D-5				
D-5	Ra-226+D , fish	5.000E+01	5.000E+01	BIOFAC(2,1)
D-5	Ra-226+D , crustacea and mollusks	2.500E+02	2.500E+02	BIOFAC(2,2)
D-5				
D-5	Ra-228+D , fish	5.000E+01	5.000E+01	BIOFAC(3,1)
D-5	Ra-228+D , crustacea and mollusks	2.500E+02	2.500E+02	BIOFAC(3,2)
D-5				
D-5	Th-228+D , fish	1.000E+02	1.000E+02	BIOFAC(4,1)
D-5	Th-228+D , crustacea and mollusks	5.000E+02	5.000E+02	BIOFAC(4,2)

Site-Specific Parameter Summary

Menu	Parameter	User Input	Default	Used by RESRAD (If different from user input)	Parameter Name
R011	Area of contaminated zone (m**2)	1.000E+04	1.000E+04	---	AREA
R011	Thickness of contaminated zone (m)	1.500E-01	2.000E+00	---	THICK0
R011	Length parallel to aquifer flow (m)	1.000E+02	1.000E+02	---	LCZPAQ
R011	Basic radiation dose limit (mrem/yr)	1.000E+02	3.000E+01	---	BRDL
R011	Time since placement of material (yr)	0.000E+00	0.000E+00	---	TI
R011	Times for calculations (yr)	1.000E+00	1.000E+00	---	T(2)
R011	Times for calculations (yr)	1.000E+01	3.000E+00	---	T(3)
R011	Times for calculations (yr)	5.000E+02	1.000E+01	---	T(4)
R011	Times for calculations (yr)	1.000E+03	3.000E+01	---	T(5)
R011	Times for calculations (yr)	not used	1.000E+02	---	T(6)
R011	Times for calculations (yr)	not used	3.000E+02	---	T(7)
R011	Times for calculations (yr)	not used	1.000E+03	---	T(8)
R011	Times for calculations (yr)	not used	0.000E+00	---	T(9)
R011	Times for calculations (yr)	not used	0.000E+00	---	T(10)
R012	Initial principal radionuclide (pCi/g): Pb-210	4.000E+00	0.000E+00	---	S1(1)
R012	Initial principal radionuclide (pCi/g): Ra-226	4.000E+00	0.000E+00	---	S1(2)
R012	Initial principal radionuclide (pCi/g): Ra-228	1.000E+00	0.000E+00	---	S1(3)
R012	Initial principal radionuclide (pCi/g): Th-228	1.000E+00	0.000E+00	---	S1(4)
R012	Concentration in groundwater (pCi/L): Pb-210	not used	0.000E+00	---	W1(1)
R012	Concentration in groundwater (pCi/L): Ra-226	not used	0.000E+00	---	W1(2)
R012	Concentration in groundwater (pCi/L): Ra-228	not used	0.000E+00	---	W1(3)
R012	Concentration in groundwater (pCi/L): Th-228	not used	0.000E+00	---	W1(4)
R013	Cover depth (m)	0.000E+00	0.000E+00	---	COVER0
R013	Density of cover material (g/cm**3)	not used	1.500E+00	---	DENSCV
R013	Cover depth erosion rate (m/yr)	not used	1.000E-03	---	VCV
R013	Density of contaminated zone (g/cm**3)	1.500E+00	1.500E+00	---	DENSCZ
R013	Contaminated zone erosion rate (m/yr)	1.000E-04	1.000E-03	---	VCZ
R013	Contaminated zone total porosity	4.000E-01	4.000E-01	---	TPCZ
R013	Contaminated zone effective porosity	2.000E-01	2.000E-01	---	EPCZ
R013	Contaminated zone hydraulic conductivity (m/yr)	1.000E+01	1.000E+01	---	HCCZ
R013	Contaminated zone b parameter	5.300E+00	5.300E+00	---	BCZ
R013	Average annual wind speed (m/sec)	2.000E+00	2.000E+00	---	WIND
R013	Humidity in air (g/m**3)	not used	8.000E+00	---	HUMID
R013	Evapotranspiration coefficient	5.000E-01	5.000E-01	---	EVAPTR
R013	Precipitation (m/yr)	1.000E+00	1.000E+00	---	PRECIP
R013	Irrigation (m/yr)	2.000E-01	2.000E-01	---	RI
R013	Irrigation mode	overhead	overhead	---	IDITCH
R013	Runoff coefficient	2.000E-01	2.000E-01	---	RUNOFF
R013	Watershed area for nearby stream or pond (m**2)	1.000E+06	1.000E+06	---	WAREA
R013	Accuracy for water/soil computations	1.000E-03	1.000E-03	---	EPS
R014	Density of saturated zone (g/cm**3)	1.500E+00	1.500E+00	---	DENSAQ
R014	Saturated zone total porosity	4.000E-01	4.000E-01	---	TPSZ
R014	Saturated zone effective porosity	2.000E-01	2.000E-01	---	EPSZ
R014	Saturated zone hydraulic conductivity (m/yr)	1.000E+02	1.000E+02	---	HCSZ
R014	Saturated zone hydraulic gradient	2.000E-02	2.000E-02	---	HGWT
R014	Saturated zone b parameter	5.300E+00	5.300E+00	---	BSZ
R014	Water table drop rate (m/yr)	0.000E+00	1.000E-03	---	VWT
R014	Well pump intake depth (m below water table)	1.000E+01	1.000E+01	---	DWIBWT

Site-Specific Parameter Summary (continued)

Menu	Parameter	User Input	Default	Used by RESRAD (If different from user input)	Parameter Name
R014	Model: Nondispersion (ND) or Mass-Balance (MB)	ND	ND	---	MODEL
R014	Well pumping rate (m**3/yr)	2.500E+02	2.500E+02	---	UW
R015	Number of unsaturated zone strata	1	1	---	NS
R015	Unsat. zone 1, thickness (m)	4.000E+00	4.000E+00	---	H(1)
R015	Unsat. zone 1, soil density (g/cm**3)	1.500E+00	1.500E+00	---	DENSUZ(1)
R015	Unsat. zone 1, total porosity	4.000E-01	4.000E-01	---	TPUZ(1)
R015	Unsat. zone 1, effective porosity	2.000E-01	2.000E-01	---	EPUZ(1)
R015	Unsat. zone 1, soil-specific b parameter	5.300E+00	5.300E+00	---	BUZ(1)
R015	Unsat. zone 1, hydraulic conductivity (m/yr)	1.000E+01	1.000E+01	---	HCUZ(1)
R016	Distribution coefficients for Pb-210				
R016	Contaminated zone (cm**3/g)	1.000E+02	1.000E+02	---	DCNUCC(1)
R016	Unsaturated zone 1 (cm**3/g)	1.000E+02	1.000E+02	---	DCNUCU(1,1)
R016	Saturated zone (cm**3/g)	1.000E+02	1.000E+02	---	DCNUCS(1)
R016	Leach rate (/yr)	0.000E+00	0.000E+00	2.217E-02	ALEACH(1)
R016	Solubility constant	0.000E+00	0.000E+00	not used	SOLUBK(1)
R016	Distribution coefficients for Ra-226				
R016	Contaminated zone (cm**3/g)	7.000E+01	7.000E+01	---	DCNUCC(2)
R016	Unsaturated zone 1 (cm**3/g)	7.000E+01	7.000E+01	---	DCNUCU(2,1)
R016	Saturated zone (cm**3/g)	7.000E+01	7.000E+01	---	DCNUCS(2)
R016	Leach rate (/yr)	0.000E+00	0.000E+00	3.165E-02	ALEACH(2)
R016	Solubility constant	0.000E+00	0.000E+00	not used	SOLUBK(2)
R016	Distribution coefficients for Ra-228				
R016	Contaminated zone (cm**3/g)	7.000E+01	7.000E+01	---	DCNUCC(3)
R016	Unsaturated zone 1 (cm**3/g)	7.000E+01	7.000E+01	---	DCNUCU(3,1)
R016	Saturated zone (cm**3/g)	7.000E+01	7.000E+01	---	DCNUCS(3)
R016	Leach rate (/yr)	0.000E+00	0.000E+00	3.165E-02	ALEACH(3)
R016	Solubility constant	0.000E+00	0.000E+00	not used	SOLUBK(3)
R016	Distribution coefficients for Th-228				
R016	Contaminated zone (cm**3/g)	6.000E+04	6.000E+04	---	DCNUCC(4)
R016	Unsaturated zone 1 (cm**3/g)	6.000E+04	6.000E+04	---	DCNUCU(4,1)
R016	Saturated zone (cm**3/g)	6.000E+04	6.000E+04	---	DCNUCS(4)
R016	Leach rate (/yr)	0.000E+00	0.000E+00	3.704E-05	ALEACH(4)
R016	Solubility constant	0.000E+00	0.000E+00	not used	SOLUBK(4)
R017	Inhalation rate (m**3/yr)	8.400E+03	8.400E+03	---	INHALR
R017	Mass loading for inhalation (g/m**3)	5.000E-05	1.000E-04	---	MLINH
R017	Exposure duration	3.000E+01	3.000E+01	---	ED
R017	Shielding factor, inhalation	4.000E-01	4.000E-01	---	SHF3
R017	Shielding factor, external gamma	7.000E-01	7.000E-01	---	SHF1
R017	Fraction of time spent indoors	5.000E-01	5.000E-01	---	FIND
R017	Fraction of time spent outdoors (on site)	2.500E-01	2.500E-01	---	FOTD
R017	Shape factor flag, external gamma	1.000E+00	1.000E+00	>0 shows circular AREA.	FS

Site-Specific Parameter Summary (continued)

Menu	Parameter	User Input	Default	Used by RESRAD (If different from user input)	Parameter Name
R017	Radii of shape factor array (used if FS = -1):				
R017	Outer annular radius (m), ring 1:	not used	5.000E+01	---	RAD_SHAPE(1)
R017	Outer annular radius (m), ring 2:	not used	7.071E+01	---	RAD_SHAPE(2)
R017	Outer annular radius (m), ring 3:	not used	0.000E+00	---	RAD_SHAPE(3)
R017	Outer annular radius (m), ring 4:	not used	0.000E+00	---	RAD_SHAPE(4)
R017	Outer annular radius (m), ring 5:	not used	0.000E+00	---	RAD_SHAPE(5)
R017	Outer annular radius (m), ring 6:	not used	0.000E+00	---	RAD_SHAPE(6)
R017	Outer annular radius (m), ring 7:	not used	0.000E+00	---	RAD_SHAPE(7)
R017	Outer annular radius (m), ring 8:	not used	0.000E+00	---	RAD_SHAPE(8)
R017	Outer annular radius (m), ring 9:	not used	0.000E+00	---	RAD_SHAPE(9)
R017	Outer annular radius (m), ring 10:	not used	0.000E+00	---	RAD_SHAPE(10)
R017	Outer annular radius (m), ring 11:	not used	0.000E+00	---	RAD_SHAPE(11)
R017	Outer annular radius (m), ring 12:	not used	0.000E+00	---	RAD_SHAPE(12)
R017	Fractions of annular areas within AREA:				
R017	Ring 1	not used	1.000E+00	---	FRACA(1)
R017	Ring 2	not used	2.732E-01	---	FRACA(2)
R017	Ring 3	not used	0.000E+00	---	FRACA(3)
R017	Ring 4	not used	0.000E+00	---	FRACA(4)
R017	Ring 5	not used	0.000E+00	---	FRACA(5)
R017	Ring 6	not used	0.000E+00	---	FRACA(6)
R017	Ring 7	not used	0.000E+00	---	FRACA(7)
R017	Ring 8	not used	0.000E+00	---	FRACA(8)
R017	Ring 9	not used	0.000E+00	---	FRACA(9)
R017	Ring 10	not used	0.000E+00	---	FRACA(10)
R017	Ring 11	not used	0.000E+00	---	FRACA(11)
R017	Ring 12	not used	0.000E+00	---	FRACA(12)
R018	Fruits, vegetables and grain consumption (kg/yr)	1.600E+02	1.600E+02	---	DIET(1)
R018	Leafy vegetable consumption (kg/yr)	1.400E+01	1.400E+01	---	DIET(2)
R018	Milk consumption (L/yr)	9.200E+01	9.200E+01	---	DIET(3)
R018	Meat and poultry consumption (kg/yr)	6.300E+01	6.300E+01	---	DIET(4)
R018	Fish consumption (kg/yr)	5.400E+00	5.400E+00	---	DIET(5)
R018	Other seafood consumption (kg/yr)	9.000E-01	9.000E-01	---	DIET(6)
R018	Soil ingestion rate (g/yr)	3.650E+01	3.650E+01	---	SOIL
R018	Drinking water intake (L/yr)	5.100E+02	5.100E+02	---	DWI
R018	Contamination fraction of drinking water	1.000E+00	1.000E+00	---	FDW
R018	Contamination fraction of household water	1.000E+00	1.000E+00	---	FHHW
R018	Contamination fraction of livestock water	1.000E+00	1.000E+00	---	FLW
R018	Contamination fraction of irrigation water	1.000E+00	1.000E+00	---	FIRW
R018	Contamination fraction of aquatic food	5.000E-01	5.000E-01	---	FR9
R018	Contamination fraction of plant food	-1	-1	0.500E+00	FPLANT
R018	Contamination fraction of meat	-1	-1	0.500E+00	FMEAT
R018	Contamination fraction of milk	-1	-1	0.500E+00	FMILK
R019	Livestock fodder intake for meat (kg/day)	6.800E+01	6.800E+01	---	LFI5
R019	Livestock fodder intake for milk (kg/day)	5.500E+01	5.500E+01	---	LFI6
R019	Livestock water intake for meat (L/day)	5.000E+01	5.000E+01	---	LWI5
R019	Livestock water intake for milk (L/day)	1.600E+02	1.600E+02	---	LWI6
R019	Livestock soil intake (kg/day)	5.000E-01	5.000E-01	---	LSI
R019	Mass loading for foliar deposition (g/m**3)	1.000E-04	1.000E-04	---	MLFD

Site-Specific Parameter Summary (continued)

Menu	Parameter	User Input	Default	Used by RESRAD (If different from user input)	Parameter Name
R019	Depth of soil mixing layer (m)	1.500E-01	1.500E-01	---	DM
R019	Depth of roots (m)	9.000E-01	9.000E-01	---	DROOT
R019	Drinking water fraction from ground water	1.000E+00	1.000E+00	---	FGWDW
R019	Household water fraction from ground water	1.000E+00	1.000E+00	---	FGWHH
R019	Livestock water fraction from ground water	1.000E+00	1.000E+00	---	FGWLW
R019	Irrigation fraction from ground water	1.000E+00	1.000E+00	---	FGWIR
R19B	Wet weight crop yield for Non-Leafy (kg/m**2)	7.000E-01	7.000E-01	---	YV(1)
R19B	Wet weight crop yield for Leafy (kg/m**2)	1.500E+00	1.500E+00	---	YV(2)
R19B	Wet weight crop yield for Fodder (kg/m**2)	1.100E+00	1.100E+00	---	YV(3)
R19B	Growing Season for Non-Leafy (years)	1.700E-01	1.700E-01	---	TE(1)
R19B	Growing Season for Leafy (years)	2.500E-01	2.500E-01	---	TE(2)
R19B	Growing Season for Fodder (years)	8.000E-02	8.000E-02	---	TE(3)
R19B	Translocation Factor for Non-Leafy	1.000E-01	1.000E-01	---	TIV(1)
R19B	Translocation Factor for Leafy	1.000E+00	1.000E+00	---	TIV(2)
R19B	Translocation Factor for Fodder	1.000E+00	1.000E+00	---	TIV(3)
R19B	Dry Foliar Interception Fraction for Non-Leafy	2.500E-01	2.500E-01	---	RDRY(1)
R19B	Dry Foliar Interception Fraction for Leafy	2.500E-01	2.500E-01	---	RDRY(2)
R19B	Dry Foliar Interception Fraction for Fodder	2.500E-01	2.500E-01	---	RDRY(3)
R19B	Wet Foliar Interception Fraction for Non-Leafy	2.500E-01	2.500E-01	---	RWET(1)
R19B	Wet Foliar Interception Fraction for Leafy	2.500E-01	2.500E-01	---	RWET(2)
R19B	Wet Foliar Interception Fraction for Fodder	2.500E-01	2.500E-01	---	RWET(3)
R19B	Weathering Removal Constant for Vegetation	2.000E+01	2.000E+01	---	WLAM
C14	C-12 concentration in water (g/cm**3)	not used	2.000E-05	---	C12WTR
C14	C-12 concentration in contaminated soil (g/g)	not used	3.000E-02	---	C12CZ
C14	Fraction of vegetation carbon from soil	not used	2.000E-02	---	CSOIL
C14	Fraction of vegetation carbon from air	not used	9.800E-01	---	CAIR
C14	C-14 evasion layer thickness in soil (m)	not used	3.000E-01	---	DMC
C14	C-14 evasion flux rate from soil (1/sec)	not used	7.000E-07	---	EVSN
C14	C-12 evasion flux rate from soil (1/sec)	not used	1.000E-10	---	REVSN
C14	Fraction of grain in beef cattle feed	not used	8.000E-01	---	AVFG4
C14	Fraction of grain in milk cow feed	not used	2.000E-01	---	AVFG5
STOR	Storage times of contaminated foodstuffs (days):				
STOR	Fruits, non-leafy vegetables, and grain	1.400E+01	1.400E+01	---	STOR_T(1)
STOR	Leafy vegetables	1.000E+00	1.000E+00	---	STOR_T(2)
STOR	Milk	1.000E+00	1.000E+00	---	STOR_T(3)
STOR	Meat and poultry	2.000E+01	2.000E+01	---	STOR_T(4)
STOR	Fish	7.000E+00	7.000E+00	---	STOR_T(5)
STOR	Crustacea and mollusks	7.000E+00	7.000E+00	---	STOR_T(6)
STOR	Well water	1.000E+00	1.000E+00	---	STOR_T(7)
STOR	Surface water	1.000E+00	1.000E+00	---	STOR_T(8)
STOR	Livestock fodder	4.500E+01	4.500E+01	---	STOR_T(9)
R021	Thickness of building foundation (m)	1.500E-01	1.500E-01	---	FLOOR
R021	Bulk density of building foundation (g/cm**3)	2.400E+00	2.400E+00	---	DENSFL
R021	Total porosity of the cover material	not used	4.000E-01	---	TPCV
R021	Total porosity of the building foundation	1.000E-01	1.000E-01	---	TPFL
R021	Volumetric water content of the cover material	not used	5.000E-02	---	PH2OCV
R021	Volumetric water content of the foundation	3.000E-02	3.000E-02	---	PH2OFL

Site-Specific Parameter Summary (continued)

Menu	Parameter	User Input	Default	Used by RESRAD (If different from user input)	Parameter Name
R021	Diffusion coefficient for radon gas (m/sec):				
R021	in cover material	not used	2.000E-06	---	DIFCV
R021	in foundation material	3.000E-07	3.000E-07	---	DIFFL
R021	in contaminated zone soil	2.000E-06	2.000E-06	---	DIFCZ
R021	Radon vertical dimension of mixing (m)	2.000E+00	2.000E+00	---	HMIX
R021	Average building air exchange rate (1/hr)	5.000E-01	5.000E-01	---	REXG
R021	Height of the building (room) (m)	2.500E+00	2.500E+00	---	HRM
R021	Building interior area factor	0.000E+00	0.000E+00	code computed (time dependent)	FAI
R021	Building depth below ground surface (m)	-1.000E+00	-1.000E+00	code computed (time dependent)	DMFL
R021	Emanating power of Rn-222 gas	2.500E-01	2.500E-01	---	EMANA(1)
R021	Emanating power of Rn-220 gas	1.500E-01	1.500E-01	---	EMANA(2)

Summary of Pathway Selections

Pathway	User Selection
1 -- external gamma	active
2 -- inhalation (w/o radon)	active
3 -- plant ingestion	active
4 -- meat ingestion	active
5 -- milk ingestion	active
6 -- aquatic foods	active
7 -- drinking water	active
8 -- soil ingestion	active
9 -- radon	active
Find peak pathway doses	suppressed

RESRAD, Version 5.82 T½ Limit = 0.5 year 05/07/99 19:01 Page 8
Summary : RESRAD CRCPD Part N--Example File: Site1.RAD

Contaminated Zone Dimensions

Area: 10000.00 square meters
Thickness: 0.15 meters

Cover Depth: 0.00 meters

Initial Soil Concentrations, pCi/g

Pb-210	4.000E+00
Ra-226	4.000E+00
Ra-228	1.000E+00
Th-228	1.000E+00

Total Dose TDOSE(t), mrem/yr

Basic Radiation Dose Limit = 100 mrem/yr

Total Mixture Sum M(t) = Fraction of Basic Dose Limit Received at Time (t)

t (years):	0.000E+00	1.000E+00	1.000E+01	5.000E+02	1.000E+03
TDOSE(t):	1.448E+02	1.399E+02	1.011E+02	4.590E+00	4.142E+00
M(t):	1.448E+00	1.399E+00	1.011E+00	4.590E-02	4.142E-02

Maximum TDOSE(t): 1.448E+02 mrem/yr at t = 0.000E+00 years

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 0.000E+00 years
Water Independent Pathways (Inhalation excludes radon)

Radio-	Ground		Inhalation		Radon		Plant		Meat		Milk		Soil	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	1.420E-02	0.0001	2.969E-03	0.0000	0.000E+00	0.0000	4.220E+00	0.0291	4.497E-01	0.0031	2.375E-01	0.0016	7.961E-01	0.0055
Ra-226	2.250E+01	0.1554	1.101E-03	0.0000	1.037E+02	0.7158	3.086E+00	0.0213	1.598E-01	0.0011	2.122E-01	0.0015	1.456E-01	0.0010
Ra-228	3.057E+00	0.0211	1.625E-04	0.0000	0.000E+00	0.0000	8.354E-01	0.0058	4.326E-02	0.0003	5.743E-02	0.0004	3.942E-02	0.0003
Th-228	4.954E+00	0.0342	1.104E-02	0.0001	2.934E-01	0.0020	1.180E-02	0.0001	1.302E-03	0.0000	9.467E-05	0.0000	2.212E-02	0.0002
Total	3.052E+01	0.2108	1.527E-02	0.0001	1.040E+02	0.7179	8.153E+00	0.0563	6.541E-01	0.0045	5.072E-01	0.0035	1.003E+00	0.0069

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 0.000E+00 years
Water Dependent Pathways

Radio-	Water		Fish		Radon		Plant		Meat		Milk		All Pathways*	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	5.720E+00	0.0395
Ra-226	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	1.298E+02	0.8961
Ra-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	4.032E+00	0.0278
Th-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	5.293E+00	0.0366
Total	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	1.448E+02	1.0000

*Sum of all water independent and dependent pathways.

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 1.000E+00 years
Water Independent Pathways (Inhalation excludes radon)

Radio-	Ground		Inhalation		Radon		Plant		Meat		Milk		Soil	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	1.346E-02	0.0001	2.813E-03	0.0000	0.000E+00	0.0000	4.001E+00	0.0286	4.269E-01	0.0031	2.252E-01	0.0016	7.543E-01	0.0054
Ra-226	2.178E+01	0.1557	1.154E-03	0.0000	1.004E+02	0.7174	3.129E+00	0.0224	1.703E-01	0.0012	2.132E-01	0.0015	1.646E-01	0.0012
Ra-228	4.015E+00	0.0287	3.235E-03	0.0000	8.234E-02	0.0006	7.261E-01	0.0052	3.806E-02	0.0003	4.943E-02	0.0004	4.004E-02	0.0003
Th-228	3.447E+00	0.0246	7.679E-03	0.0001	2.042E-01	0.0015	8.209E-03	0.0001	9.059E-04	0.0000	6.585E-05	0.0000	1.539E-02	0.0001
Total	2.926E+01	0.2092	1.488E-02	0.0001	1.006E+02	0.7195	7.865E+00	0.0562	6.361E-01	0.0045	4.879E-01	0.0035	9.743E-01	0.0070

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 1.000E+00 years
Water Dependent Pathways

Radio-	Water		Fish		Radon		Plant		Meat		Milk		All Pathways*	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	5.424E+00	0.0388
Ra-226	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	1.258E+02	0.8995
Ra-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	4.954E+00	0.0354
Th-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	3.684E+00	0.0263
Total	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	1.399E+02	1.0000

*Sum of all water independent and dependent pathways.

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 1.000E+01 years
Water Independent Pathways (Inhalation excludes radon)

Radio-	Ground		Inhalation		Radon		Plant		Meat		Milk		Soil	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	8.334E-03	0.0001	1.732E-03	0.0000	0.000E+00	0.0000	2.463E+00	0.0244	2.627E-01	0.0026	1.386E-01	0.0014	4.642E-01	0.0046
Ra-226	1.629E+01	0.1612	1.393E-03	0.0000	7.490E+01	0.7411	3.089E+00	0.0306	2.078E-01	0.0021	2.015E-01	0.0020	2.657E-01	0.0026
Ra-228	2.298E+00	0.0227	3.657E-03	0.0000	9.692E-02	0.0010	1.865E-01	0.0018	9.950E-03	0.0001	1.251E-02	0.0001	1.580E-02	0.0002
Th-228	1.319E-01	0.0013	2.927E-04	0.0000	7.831E-03	0.0001	3.129E-04	0.0000	3.453E-05	0.0000	2.510E-06	0.0000	5.864E-04	0.0000
Total	1.873E+01	0.1853	7.074E-03	0.0001	7.501E+01	0.7422	5.739E+00	0.0568	4.805E-01	0.0048	3.526E-01	0.0035	7.463E-01	0.0074

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 1.000E+01 years
Water Dependent Pathways

Radio-	Water		Fish		Radon		Plant		Meat		Milk		All Pathways*	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	3.338E+00	0.0330
Ra-226	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	9.496E+01	0.9396
Ra-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	2.624E+00	0.0260
Th-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	1.410E-01	0.0014
Total	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	1.011E+02	1.0000

*Sum of all water independent and dependent pathways.

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 5.000E+02 years
Water Independent Pathways (Inhalation excludes radon)

Radio-	Ground		Inhalation		Radon		Plant		Meat		Milk		Soil	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	3.722E-14	0.0000	5.393E-15	0.0000	0.000E+00	0.0000	7.670E-12	0.0000	8.182E-13	0.0000	4.317E-13	0.0000	1.446E-12	0.0000
Ra-226	2.083E-06	0.0000	3.930E-10	0.0000	8.553E-06	0.0000	6.697E-07	0.0000	5.928E-08	0.0000	4.045E-08	0.0000	9.461E-08	0.0000
Ra-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000
Th-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000
Total	2.083E-06	0.0000	3.930E-10	0.0000	8.553E-06	0.0000	6.697E-07	0.0000	5.928E-08	0.0000	4.045E-08	0.0000	9.461E-08	0.0000

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 5.000E+02 years
Water Dependent Pathways

Radio-	Water		Fish		Radon		Plant		Meat		Milk		All Pathways*	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	1.041E-11	0.0000
Ra-226	3.983E+00	0.8677	5.673E-02	0.0124	1.652E-01	0.0360	3.076E-01	0.0670	3.599E-02	0.0078	4.183E-02	0.0091	4.590E+00	1.0000
Ra-228	4.026E-28	0.0000	1.945E-30	0.0000	0.000E+00	0.0000	3.114E-29	0.0000	4.312E-30	0.0000	9.405E-30	0.0000	4.494E-28	0.0000
Th-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000
Total	3.983E+00	0.8677	5.673E-02	0.0124	1.652E-01	0.0360	3.076E-01	0.0670	3.599E-02	0.0078	4.183E-02	0.0091	4.590E+00	1.0000

*Sum of all water independent and dependent pathways.

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 1.000E+03 years
Water Independent Pathways (Inhalation excludes radon)

Radio-	Ground		Inhalation		Radon		Plant		Meat		Milk		Soil	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	8.579E-26	0.0000	7.346E-27	0.0000	0.000E+00	0.0000	1.045E-23	0.0000	1.115E-24	0.0000	5.880E-25	0.0000	1.969E-24	0.0000
Ra-226	1.544E-13	0.0000	2.122E-17	0.0000	0.000E+00	0.0000	3.616E-14	0.0000	3.201E-15	0.0000	2.184E-15	0.0000	5.108E-15	0.0000
Ra-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000
Th-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000
Total	1.544E-13	0.0000	2.122E-17	0.0000	0.000E+00	0.0000	3.616E-14	0.0000	3.201E-15	0.0000	2.184E-15	0.0000	5.108E-15	0.0000

Total Dose Contributions TDOSE(i,p,t) for Individual Radionuclides (i) and Pathways (p)
As mrem/yr and Fraction of Total Dose At t = 1.000E+03 years
Water Dependent Pathways

Radio-	Water		Fish		Radon		Plant		Meat		Milk		All Pathways*	
Nuclide	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.	mrem/yr	fract.
Pb-210	1.364E-13	0.0000	2.286E-15	0.0000	0.000E+00	0.0000	1.051E-14	0.0000	1.168E-15	0.0000	9.587E-16	0.0000	1.513E-13	0.0000
Ra-226	3.598E+00	0.8687	5.153E-02	0.0124	1.446E-01	0.0349	2.779E-01	0.0671	3.247E-02	0.0078	3.740E-02	0.0090	4.142E+00	1.0000
Ra-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000
Th-228	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000	0.000E+00	0.0000
Total	3.598E+00	0.8687	5.153E-02	0.0124	1.446E-01	0.0349	2.779E-01	0.0671	3.247E-02	0.0078	3.740E-02	0.0090	4.142E+00	1.0000

*Sum of all water independent and dependent pathways.

Dose/Source Ratios Summed Over All Pathways

Parent and Progeny Principal Radionuclide Contributions Indicated

Parent (i)	Product (j)	Branch Fraction*	DSR(j,t) (mrem/yr)/(pCi/g) t= 0.000E+00	1.000E+00	1.000E+01	5.000E+02	1.000E+03
Pb-210	Pb-210	1.000E+00	1.430E+00	1.356E+00	8.346E-01	2.602E-12	3.782E-14
Ra-226	Ra-226	1.000E+00	3.244E+01	3.141E+01	2.345E+01	2.763E-01	2.418E-01
Ra-226	Pb-210	1.000E+00	0.000E+00	4.650E-02	2.918E-01	8.713E-01	7.937E-01
Ra-226	ΣDSR(j)		3.244E+01	3.145E+01	2.374E+01	1.148E+00	1.036E+00
Ra-228	Ra-228	1.000E+00	4.032E+00	3.463E+00	8.778E-01	4.474E-28	0.000E+00
Ra-228	Th-228	1.000E+00	0.000E+00	1.491E+00	1.746E+00	2.483E-30	0.000E+00
Ra-228	ΣDSR(j)		4.032E+00	4.954E+00	2.624E+00	4.499E-28	0.000E+00
Th-228	Th-228	1.000E+00	5.293E+00	3.684E+00	1.410E-01	0.000E+00	0.000E+00

*Branch Fraction is the cumulative factor for the j't principal radionuclide
daughter: CUMBRF(j) = BRF(1)*BRF(2)* ... BRF(j).
The DSR includes contributions from associated (half-life ≤ 0.5 yr) daughters.

Single Radionuclide Soil Guidelines G(i,t) in pCi/g
Basic Radiation Dose Limit = 100 mrem/yr

Nuclide (i)	t= 0.000E+00	1.000E+00	1.000E+01	5.000E+02	1.000E+03
Pb-210	6.993E+01	7.375E+01	1.198E+02	3.843E+13	*7.631E+13
Ra-226	3.082E+00	3.179E+00	4.212E+00	8.714E+01	9.657E+01
Ra-228	2.480E+01	2.019E+01	3.811E+01	*2.726E+14	*2.726E+14
Th-228	1.889E+01	2.715E+01	7.094E+02	*8.192E+14	*8.192E+14

*At specific activity limit

Summed Dose/Source Ratios DSR(i,t) in (mrem/yr)/(pCi/g)
and Single Radionuclide Soil Guidelines G(i,t) in pCi/g
at tmin = time of minimum single radionuclide soil guideline
and at tmax = time of maximum total dose = 0.000E+00 years

Nuclide (i)	Initial pCi/g	tmin (years)	DSR(i,tmin)	G(i,tmin) (pCi/g)	DSR(i,tmax)	G(i,tmax) (pCi/g)
Pb-210	4.000E+00	0.000E+00	1.430E+00	6.993E+01	1.430E+00	6.993E+01
Ra-226	4.000E+00	0.000E+00	3.244E+01	3.082E+00	3.244E+01	3.082E+00
Ra-228	1.000E+00	2.381 ± 0.005	5.309E+00	1.883E+01	4.032E+00	2.480E+01
Th-228	1.000E+00	0.000E+00	5.293E+00	1.889E+01	5.293E+00	1.889E+01

Individual Nuclide Dose Summed Over All Pathways
Parent Nuclide and Branch Fraction Indicated

Nuclide (j)	Parent (i)	BRF(i)	DOSE(j,t), mrem/yr t= 0.000E+00	1.000E+00	1.000E+01	5.000E+02	1.000E+03
Pb-210	Pb-210	1.000E+00	5.720E+00	5.424E+00	3.338E+00	1.041E-11	1.513E-13
Pb-210	Ra-226	1.000E+00	0.000E+00	1.860E-01	1.167E+00	3.485E+00	3.175E+00
Pb-210	ΣDOSE(j):		5.720E+00	5.610E+00	4.506E+00	3.485E+00	3.175E+00
Ra-226	Ra-226	1.000E+00	1.298E+02	1.256E+02	9.379E+01	1.105E+00	9.672E-01
Ra-228	Ra-228	1.000E+00	4.032E+00	3.463E+00	8.778E-01	4.474E-28	0.000E+00
Th-228	Ra-228	1.000E+00	0.000E+00	1.491E+00	1.746E+00	2.052E-30	0.000E+00
Th-228	Th-228	1.000E+00	5.293E+00	3.684E+00	1.410E-01	0.000E+00	0.000E+00
Th-228	ΣDOSE(j):		5.293E+00	5.174E+00	1.887E+00	2.052E-30	0.000E+00

BRF(i) is the branch fraction of the parent nuclide.

Individual Nuclide Soil Concentration
Parent Nuclide and Branch Fraction Indicated

Nuclide (j)	Parent (i)	BRF(i)	S(j,t), pCi/g t= 0.000E+00	1.000E+00	1.000E+01	5.000E+02	1.000E+03
Pb-210	Pb-210	1.000E+00	4.000E+00	3.793E+00	2.348E+00	1.090E-11	2.969E-23
Pb-210	Ra-226	1.000E+00	0.000E+00	1.191E-01	8.130E-01	6.340E-07	6.847E-14
Pb-210	ΣS(j):		4.000E+00	3.912E+00	3.161E+00	6.340E-07	6.847E-14
Ra-226	Ra-226	1.000E+00	4.000E+00	3.874E+00	2.902E+00	4.319E-07	4.664E-14
Ra-228	Ra-228	1.000E+00	1.000E+00	8.588E-01	2.183E-01	8.931E-34	0.000E+00
Th-228	Ra-228	1.000E+00	0.000E+00	2.806E-01	3.303E-01	1.540E-33	0.000E+00
Th-228	Th-228	1.000E+00	1.000E+00	6.960E-01	2.669E-02	0.000E+00	0.000E+00
Th-228	ΣS(j):		1.000E+00	9.767E-01	3.570E-01	1.540E-33	0.000E+00

BRF(i) is the branch fraction of the parent nuclide.

1805.1 General.
1805.2 Dampproofing.
1805.3 Waterproofing.
1805.4 Subsoil drainage system.
Top Previous Section Next Section To view the next subsection please select the Next Section option.

SECTION 1805 DAMPPROOFING AND WATERPROOFING

1805.1 General.

Walls or portions thereof that retain earth and enclose interior spaces and floors below grade shall be waterproofed and dampproofed in accordance with this section, with the exception of those spaces containing groups other than residential and institutional where such omission is not detrimental to the building or occupancy.

Ventilation for crawl spaces shall comply with Section 1203.4.

1805.1.1 Story above grade plane.

Where a basement is considered a *story above grade plane* and the finished ground level adjacent to the basement wall is below the basement floor elevation for 25 percent or more of the perimeter, the floor and walls shall be dampproofed in accordance with Section 1805.2 and a foundation drain shall be installed in accordance with Section 1805.4.2. The foundation drain shall be installed around the portion of the perimeter where the basement floor is below ground level. The provisions of Sections 1803.5.4, 1805.3

and 1805.4.1 shall not apply in this case.

1805.1.2 Under-floor space.
The finished ground level of an under-floor space such as a crawl space shall not be located below the bottom of the footings. Where there is evidence that the ground-water table rises to within 6 inches (152 mm) of the ground level at the outside building perimeter, or that the surface water does not readily drain from the building site, the ground level of the under-floor space shall be as high as the outside finished ground level, unless an *approved* drainage system is provided. The provisions of Sections 1803.5.4, 1805.2, 1805.3 and 1805.4 shall not apply in this case.

1805.1.2.1 Flood hazard areas.
For buildings and structures in flood hazard areas as established in Section 1612.3, the finished ground level of an under-floor space such as a crawl space shall be equal to or higher than the outside finished ground level on at least one side.

Exception: Under-floor spaces of Group R-3 buildings that meet the requirements of FEMA/FIA-TB-11.

1805.1.3 Ground-water control.
Where the ground-water table is lowered and maintained at an elevation not less than 6 inches (152 mm) below the bottom of the lowest floor, the floor and walls shall be dampproofed in accordance with Section 1805.2. The design of the system to lower the ground-water table shall be based on accepted principles of engineering that shall consider, but not necessarily be limited to, permeability of the soil, rate at which water enters the drainage system, rated capacity of pumps, head against which pumps are to operate and the rated capacity of the disposal area of the system.

1805.2 Dampproofing.
Where hydrostatic pressure will not occur as determined by Section 1803.5.4, floors and walls for other than wood foundation systems shall be dampproofed in accordance with this section. Wood foundation systems shall be constructed in accordance with AF&PA PWF.

1805.2.1 Floors.
Dampproofing materials for floors shall be installed between the floor and the base course required by Section 1805.4.1, except where a separate floor is provided above a concrete slab.

Where installed beneath the slab, dampproofing shall consist of not less than 6-mil (0.006 inch; 0.152 mm) polyethylene with joints lapped not less than 6 inches (152 mm), or other *approved* methods or materials. Where permitted to be installed on top of the slab, dampproofing shall consist of mopped-on bitumen, not less than 4-mil (0.004 inch; 0.102 mm) polyethylene, or other *approved* methods or materials. Joints in the membrane shall be lapped and sealed in accordance with the manufacturer's installation instructions.

1805.2.2 Walls.
Dampproofing materials for walls shall be installed on the exterior surface of the wall, and shall extend from the top of the footing to above ground level.

Dampproofing shall consist of a bituminous material, 3 pounds per square *yard* (16 N/m^2) of acrylic modified cement, $^1/_8$ inch (3.2 mm) coat of surface-bonding mortar complying with ASTM C 887, any of the materials permitted for waterproofing by Section 1805.3.2 or other *approved* methods or materials.

1805.2.2.1 Surface preparation of walls.
Prior to application of dampproofing materials on concrete walls, holes and recesses resulting from the removal of form ties shall be sealed with a bituminous material or other *approved* methods or materials. Unit masonry walls shall be parged on the exterior surface below ground level with not less than $^3/_8$ inch (9.5 mm) of Portland cement mortar. The parging shall be coved at the footing.

Exception: Parging of unit masonry walls is not required where a material is *approved* for direct application to the masonry.

1805.3 Waterproofing.
Where the ground-water investigation required by Section 1803.5.4 indicates that a hydrostatic pressure condition exists, and the design does not include a ground-water control system as described in Section 1805.1.3, walls and floors shall be waterproofed in accordance with this section.

1805.3.1 Floors.
Floors required to be waterproofed shall be of concrete and designed and constructed to withstand the hydrostatic pressures to which the floors will be subjected.

Waterproofing shall be accomplished by placing a membrane of rubberized asphalt, butyl rubber, fully adhered/fully bonded HDPE or polyolefin composite membrane or not less than 6-mil [0.006 inch (0.152 mm)] polyvinyl chloride with joints lapped not less than 6 inches (152 mm) or other *approved* materials under the slab. Joints in the membrane shall be lapped and sealed in accordance with the manufacturer's installation instructions.

1805.3.2 Walls.
Walls required to be waterproofed shall be of concrete or masonry and shall be designed and constructed to withstand the hydrostatic pressures and other lateral loads to which the walls will be subjected.

Waterproofing shall be applied from the bottom of the wall to not less than 12 inches (305 mm) above the maximum elevation of the ground-water table. The remainder of the wall shall be dampproofed in accordance with Section 1805.2.2. Waterproofing shall consist of two-ply hot-mopped felts, not less than 6-mil (0.006 inch; 0.152 mm) polyvinyl chloride, 40-mil (0.040 inch; 1.02 mm) polymer-modified asphalt, 6-mil (0.006 inch; 0.152 mm) polyethylene or other *approved* methods or materials capable of bridging nonstructural cracks. Joints in the membrane shall be lapped and sealed in accordance with the manufacturer's installation instructions.

1805.3.2.1 Surface preparation of walls.
Prior to the application of waterproofing materials on concrete or masonry walls, the walls shall be prepared in accordance with Section 1805.2.2.1.

1805.3.3 Joints and penetrations.

Joints in walls and floors, joints between the wall and floor and penetrations of the wall and floor shall be made water-tight utilizing *approved* methods and materials.

1805.4 Subsoil drainage system.

Where a hydrostatic pressure condition does not exist, dampproofing shall be provided and a base shall be installed under the floor and a drain installed around the foundation perimeter. A subsoil drainage system designed and constructed in accordance with Section 1805.1.3 shall be deemed adequate for lowering the ground-water table.

1805.4.1 Floor base course.

Floors of basements, except as provided for in Section 1805.1.1, shall be placed over a floor base course not less than 4 inches (102 mm) in thickness that consists of gravel or crushed stone containing not more than 10 percent of material that passes through a No. 4 (4.75 mm) sieve.

Exception: Where a site is located in well-drained gravel or sand/gravel mixture soils, a floor base course is not required.

1805.4.2 Foundation drain.

A drain shall be placed around the perimeter of a foundation that consists of gravel or crushed stone containing not more than 10-percent material that passes through a No. 4 (4.75 mm) sieve. The drain shall extend a minimum of 12 inches (305 mm) beyond the outside edge of the footing. The thickness shall be such that the bottom of the drain is not higher than the bottom of the base under the floor, and that the top of the drain is not less than 6 inches (152 mm) above the top of the footing. The top of the drain shall be covered with an *approved* filter membrane material. Where a drain tile or perforated pipe is used, the invert of the pipe or tile shall not be higher than the floor elevation. The top of joints or the top of perforations shall be protected with an *approved* filter membrane material. The pipe or tile shall be placed on not less than 2 inches (51 mm) of gravel or crushed stone complying with Section 1805.4.1, and shall be covered with not less than 6 inches (152 mm) of the same material.

1805.4.3 Drainage discharge.

The floor base and foundation perimeter drain shall discharge by gravity or mechanical means into an *approved* drainage system that complies with the *International Plumbing Code*.

Exception: Where a site is located in well-drained gravel or sand/gravel mixture soils, a dedicated drainage system is not required.

Top Previous Section Next Section To view the next subsection please select the Next Section option.

R405.1 Concrete or masonry foundations.
R405.2 Wood foundations.
Top Previous Section Next Section To view the next subsection please select the Next Section option.

SECTION R405 FOUNDATION DRAINAGE

R405.1 Concrete or masonry foundations.
Drains shall be provided around all concrete or masonry foundations that retain earth and enclose habitable or usable spaces located below *grade*. Drainage tiles, gravel or crushed stone drains, perforated pipe or other *approved* systems or materials shall be installed at or below the area to be protected and shall discharge by gravity or mechanical means into an *approved* drainage system. Gravel or crushed stone drains shall extend at least 1 foot (305 mm) beyond the outside edge of the footing and 6 inches (152 mm) above the top of the footing and be covered with an *approved* filter membrane material. The top of open joints of drain tiles shall be protected with strips of building paper. Perforated drains shall be surrounded with an *approved* filter membrane or the filter membrane shall cover the washed gravel or crushed rock covering the drain. Drainage tiles or perforated pipe shall be placed on a minimum of 2 inches (51 mm) of washed gravel or crushed rock at least one sieve size larger than the tile joint opening or perforation and covered with not less than 6 inches (152 mm) of the same material.

Exception: A drainage system is not required when the foundation is installed on well-drained ground or sand-gravel mixture soils according to the Unified Soil Classification System, Group I Soils, as detailed in Table R405.1.

TABLE R405.1 PROPERTIES OF SOILS CLASSIFIED ACCORDING TO THE UNIFIED SOIL CLASSIFICATION SYSTEM

SOIL GROUP	UNIFIED SOIL CLASSIFICATION SYSTEM SYMBOL	SOIL DESCRIPTION	DRAINAGE CHARACTERISTICS[a]	FROST HEAVE POTENTIAL	VOLUME CHANGE POTENTIAL EXPANSION[b]
Group I	GW	Well-graded gravels, gravel sand mixtures, little or no fines	Good	Low	Low
	GP	Poorly graded gravels or gravel sand mixtures, little or no fines	Good	Low	Low
	SW	Well-graded sands, gravelly sands, little or no fines	Good	Low	Low
	SP	Poorly graded sands or gravelly sands, little or no fines	Good	Low	Low
	GM	Silty gravels, gravel-sand-silt mixtures	Good	Medium	Low
	SM	Silty sand, sand-silt mixtures	Good	Medium	Low
Group II	GC	Clayey gravels, gravel-sand-clay mixtures	Medium	Medium	Low
	SC	Clayey sands, sand-clay mixture	Medium	Medium	Low
	ML	Inorganic silts and very fine sands, rock flour, silty or clayey fine sands or clayey silts with slight plasticity	Medium	High	Low
	CL	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays, lean clays	Medium	Medium	Medium to Low

Group III	CH	Inorganic clays of high plasticity, fat clays	Poor	Medium	High
	MH	Inorganic silts, micaceous or diatomaceous fine sandy or silty soils, elastic silts	Poor	High	High
Group IV	OL	Organic silts and organic silty clays of low plasticity	Poor	Medium	Medium
	OH	Organic clays of medium to high plasticity, organic silts	Unsatisfactory	Medium	High
	Pt	Peat and other highly organic soils	Unsatisfactory	Medium	High

For SI: 1 inch = 25.4 mm.

a. The percolation rate for good drainage is over 4 inches per hour, medium drainage is 2 inches to 4 inches per hour, and poor is less than 2 inches per hour.

b. Soils with a low potential expansion typically have a plasticity index (PI) of 0 to 15, soils with a medium potential expansion have a PI of 10 to 35 and soils with a high potential expansion have a PI greater than 20.

R405.1.1 Precast concrete foundation.
Precast concrete walls that retain earth and enclose habitable or useable space located below-*grade* that rest on crushed stone footings shall have a perforated drainage pipe installed below the base of the wall on either the interior or exterior side of the wall, at least one foot (305 mm) beyond the edge of the wall. If the exterior drainage pipe is used, an *approved* filter membrane material shall cover the pipe. The drainage system shall discharge into an *approved* sewer system or to daylight.

R405.2 Wood foundations.
Wood foundations enclosing habitable or usable spaces located below *grade* shall be adequately drained in accordance with Sections R405.2.1 through R405.2.3.

R405.2.1 Base.
A porous layer of gravel, crushed stone or coarse sand shall be placed to a minimum thickness of 4 inches (102 mm) under the *basement* floor. Provision shall be made for automatic draining of this layer and the gravel or crushed stone wall footings.

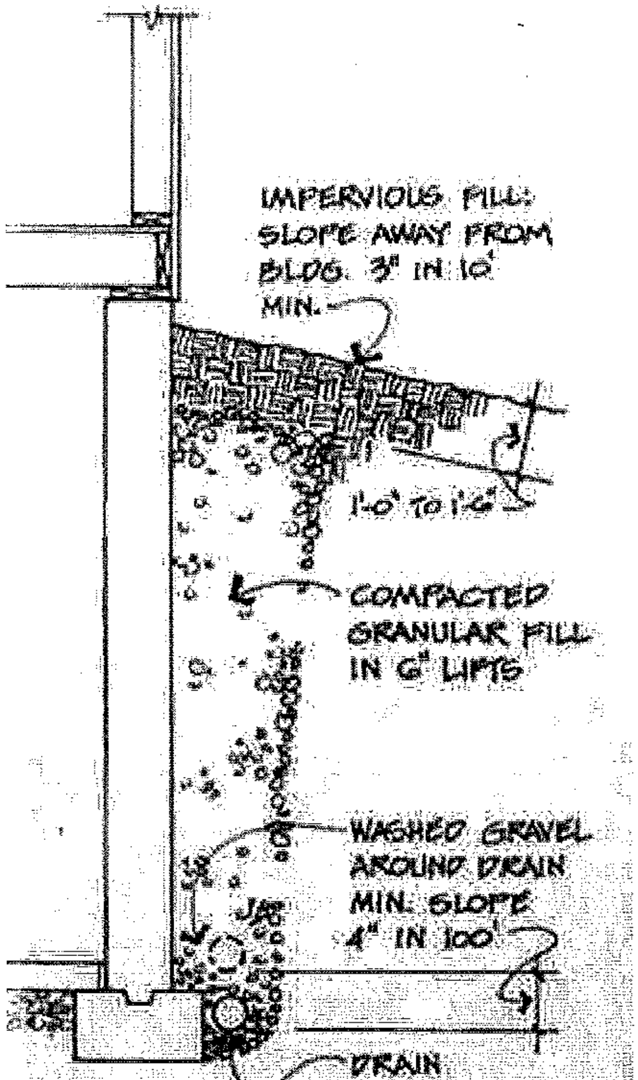
R405.2.2 Vapor retarder.

A 6-mil-thick (0.15 mm) polyethylene vapor retarder shall be applied over the porous layer with the *basement* floor constructed over the polyethylene.

R405.2.3 Drainage system.

In other than Group I soils, a sump shall be provided to drain the porous layer and footings. The sump shall be at least 24 inches (610 mm) in diameter or 20 inches square (0.0129 m^2), shall extend at least 24 inches (610 mm) below the bottom of the *basement* floor and shall be capable of positive gravity or mechanical drainage to remove any accumulated water. The drainage system shall discharge into an *approved* sewer system or to daylight.

Top Previous Section Next Section To view the next subsection please select the Next Section option.



For a dry basement, keep water away from the foundation walls. Good surface drainage and proper footing drains are the first priorities.