CONGRESSIONAL MANDATE

• ASSESS SCIENTIFIC BASIS FOR YUCCA MOUNTAIN STANDARD

CONGRESSIONAL QUESTIONS

- DOES INDIVIDUAL DOSE STANDARD PROTECT HEALTH?
- DO INSTITUTIONAL CONTROLS MITIGATE HUMAN INTRUSION?
- IS THERE A SCIENTIFIC BASIS FOR PREDICTING INTRUSION?

BASIC APPROACH TO THE STANDARD

• A RISK-BASED STANDARD

• TO PROTECT THE PERSONS AT HIGHEST RISK

• AT THE TIME THE RISK IS THE HIGHEST

ELEMENTS OF A RISK-BASED STANDARD

• LEVEL OF PROTECTION ESTABLISHED BY RULE

• PROTECT A CRITICAL GROUP

• APPLY WITHOUT TIME LIMIT

COMPLIANCE ASSESSMENT

• ADEQUATE SCIENTIFIC BASIS EXISTS FOR MODELING CONCENTRATIONS OF RADIONUCLIDES

• EXPOSURE SCENARIO REQUIRES ASSUMPTIONS ABOUT HUMAN BEHAVIOR

- TWO APPROACHES TO EXPOSURE SCENARIOS
 - \Rightarrow **PROBABILISTIC** (MAJORITY VIEW)
 - \Rightarrow **BOUNDING**

QUESTION #1: PUBLIC HEALTH

• HIGHEST RISK PERSONS PROTECTED

• INDIVIDUAL, NOT POPULATION, STANDARD PREFERRED

• CONSIDER NEGLIGIBLE INCREMENTAL RISK

QUESTION #2 AND #3: HUMAN INTRUSION

• SHOULD NOT ENTER INTO PROBABILISTIC PERFORMANCE ASSESSMENT

• INSTITUTIONAL CONTROLS USEFUL BUT NOT PREDICTABLE

• CONDUCT CONSEQUENCE ANALYSIS

TECHNOLOGY-BASED STANDARDS

- ALARA SHOULD NOT APPLY
- SUBSYSTEM STANDARDS SHOULD NOT SUBOPTIMIZE

ADMINISTRATIVE ISSUE

- RULE-MAKING WILL TAKE LONGER THAN ONE YEAR
- NEED NOT DELAY SITE CHARACTERIZATION

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