



U.S. Department of Energy  
Office of Civilian Radioactive Waste Management



# Total System Performance Assessment Analyses Evaluating the Final Environmental Protection Agency and Nuclear Regulatory Commission Rules

Presented to:

**Nuclear Waste Technical Review Board**

Presented by:

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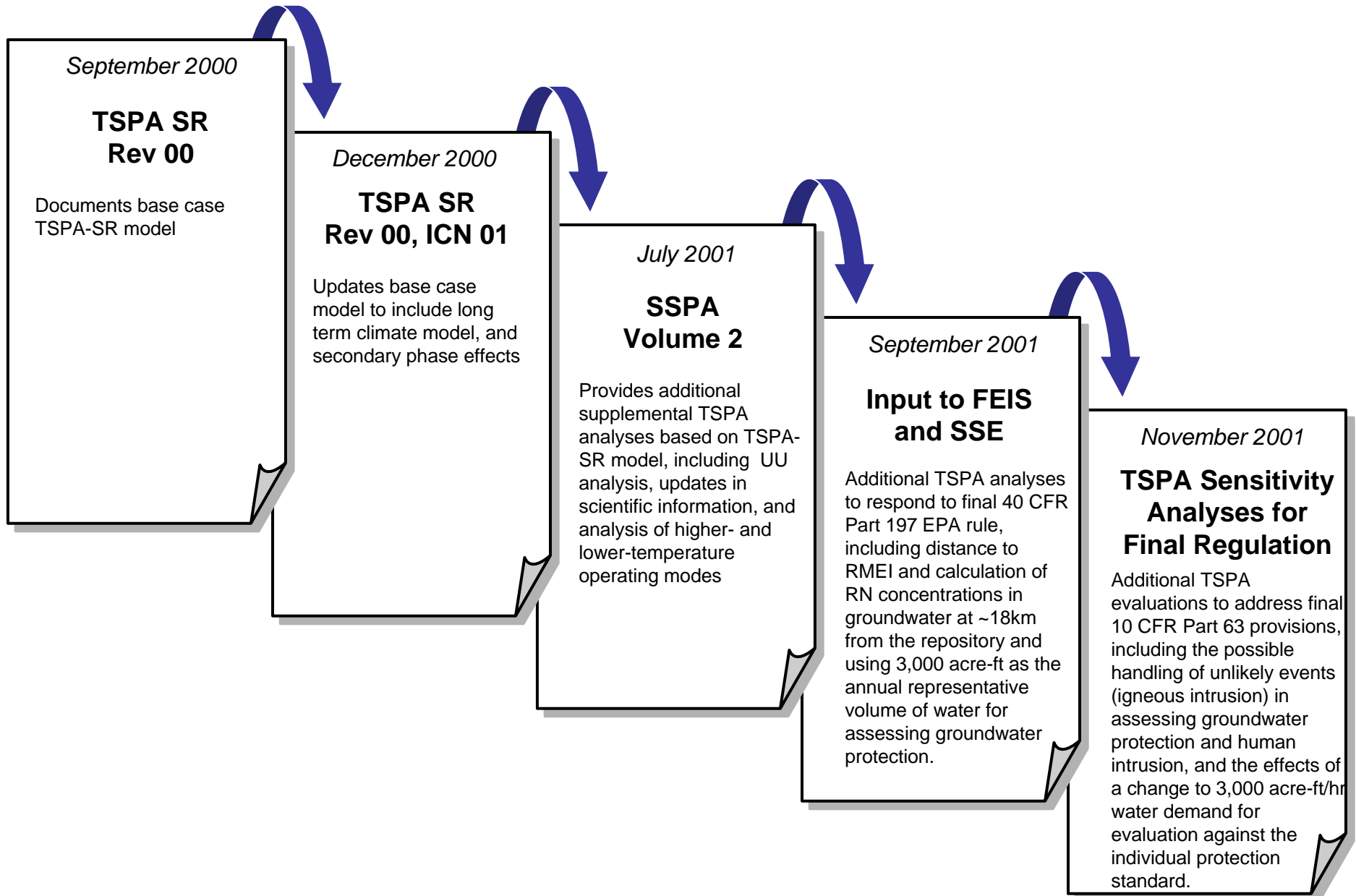


# Overview

- **Total System Performance Assessment-Site Recommendation (TSPA-SR) Documentation**
- **Contents of TSPA Letter Report on Final Environmental Protection Agency (EPA) Rule (40 CFR Part 197)**
  - To evaluate differences between proposed and final rule
- **Contents of TSPA Letter Report on Final Nuclear Regulatory Commission (NRC) Rule (10 CFR Part 63)**
  - To evaluate minor differences between proposed and final rule
- **Summary**



# TSPA-SR Documentation



# Contents of Letter Report on Final EPA Rule (40 CFR Part 197)

- **Conducted TSPA analyses for updated Supplemental Science and Performance Analyses (SSPA) model**
- **Analyses considered various waste inventories**
  - 70,000 MTHM inventory High Temperature Operating Mode (HTOM) and Low Temperature Operating Mode (LTOM)
  - Expanded inventory (Module 1 and Module 2) (HTOM)
- **Analyses for Igneous Activity Scenarios (HTOM/LTOM)**
- **Analyses for Human Intrusion (HI) Scenarios (HTOM)**
  - 30,000 years post closure
  - 100 years post closure



# Details of Changes in SSPA TSPA Model

- **Groundwater protection assessment modified as specified in 40 CFR Part 197**
  - Reasonably Maximally Exposed Individual (RMEI) Biosphere Dose Conversion Factors (BDCFs)
  - 18 km saturated zone (both for groundwater release and ash deposition)
  - 3000 ac-ft/yr average water demand used in individual protection analyses
- **Waste inventory calculations removed U.S. Navy spent nuclear fuel from DSNF inventory. Represented Navy fuel as CSNF**
- **Waste-package corrosion calculations assumed general corrosion independent of temperature**



# Details of Changes in SSPA TSPA Model

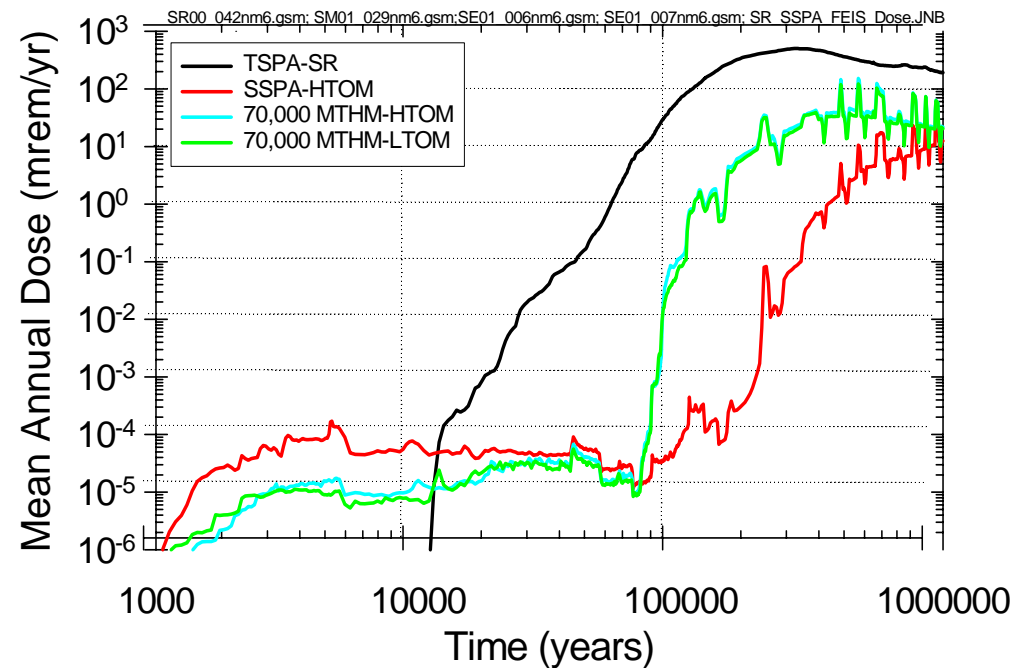
(Continued)

- **Process-level LTOM thermal-hydrologic results were corrected to include radiation connections in the thermo-hydrologic model**
- **Some minor errata corrected in human intrusion scenario, including addition of colloidal transport to UZ borehole**
- **New version of WAPDEG (includes microbiologically influenced corrosion (MIC) and aging multipliers for inside-out corrosion)**



# High Temperature Operating Mode Compared to Low Temperature Operating Mode (Nominal case)

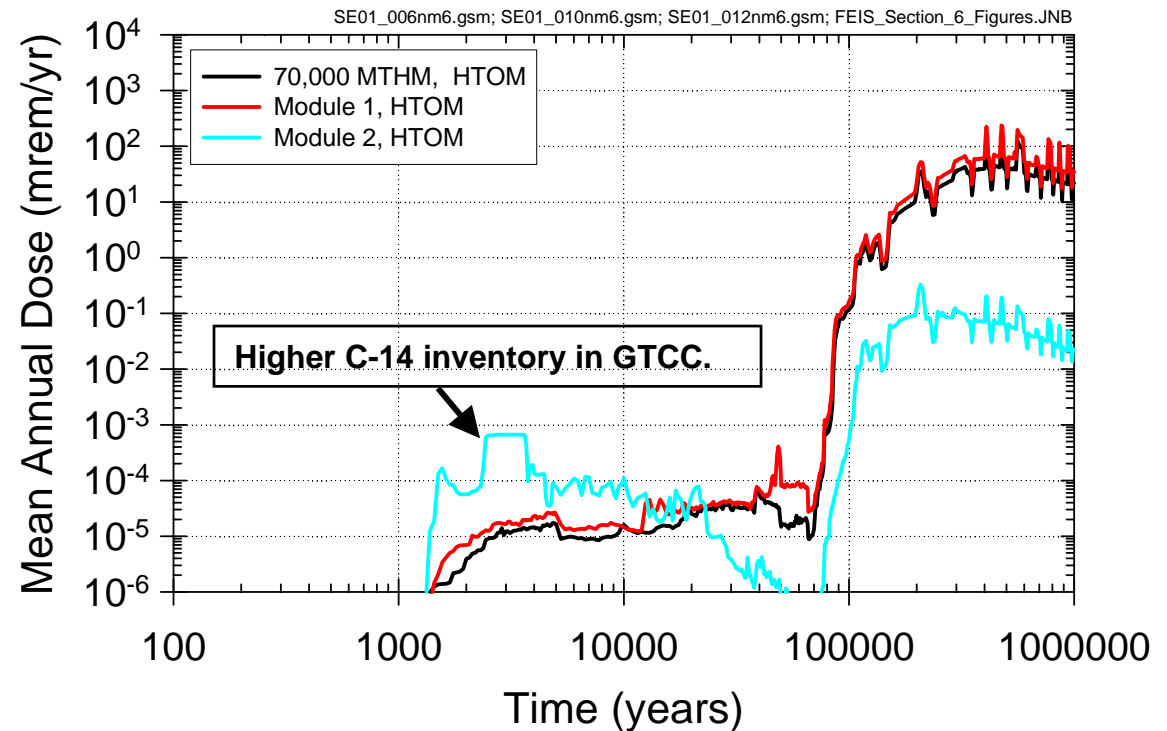
- No significant difference between the 2 operating modes in terms of total system performance
- Long waste package lifetime diminishes the effect of early thermal period





# Analyses Considered Various Waste Inventories (HTOM only)

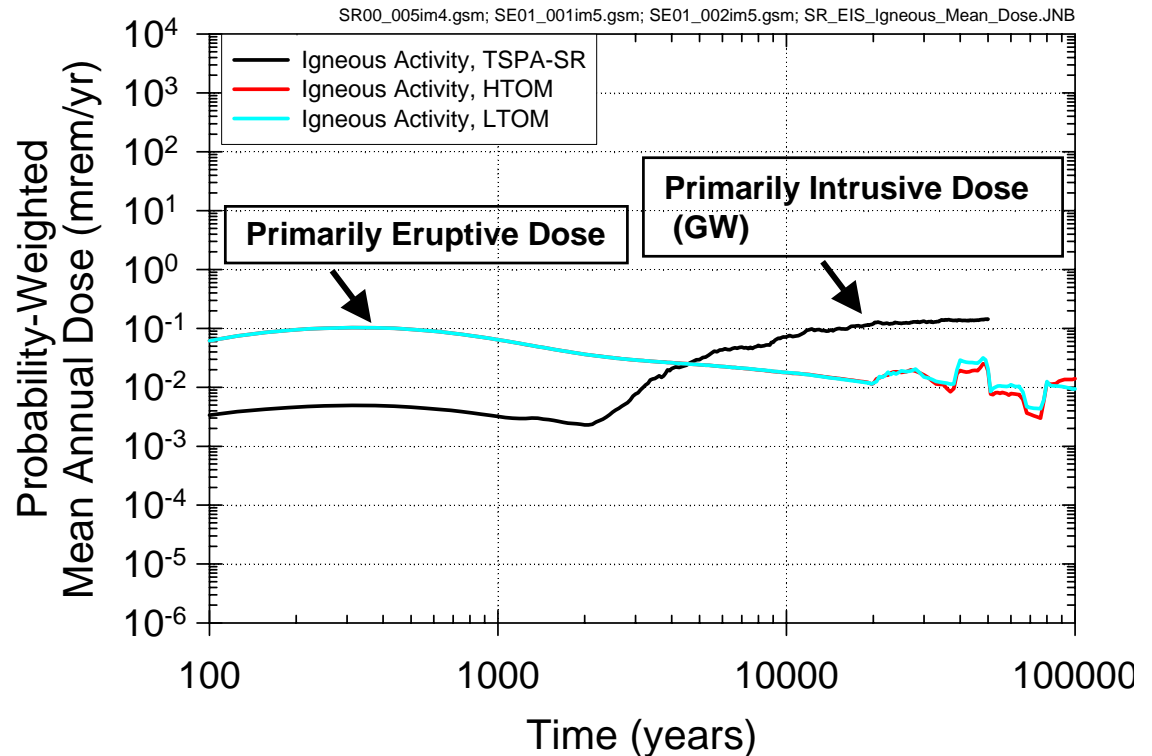
- **70,000 MTHM inventory**
- **Module 1: all waste**
  - Commercial Spent Nuclear Fuel (CSNF), DOE Spent Nuclear Fuel (DSNF), High-Level Waste (HLW)
- **Module 2 only:**
  - Greater Than Class C (GTCC) and Special Performance Assessment Required (SPAR)





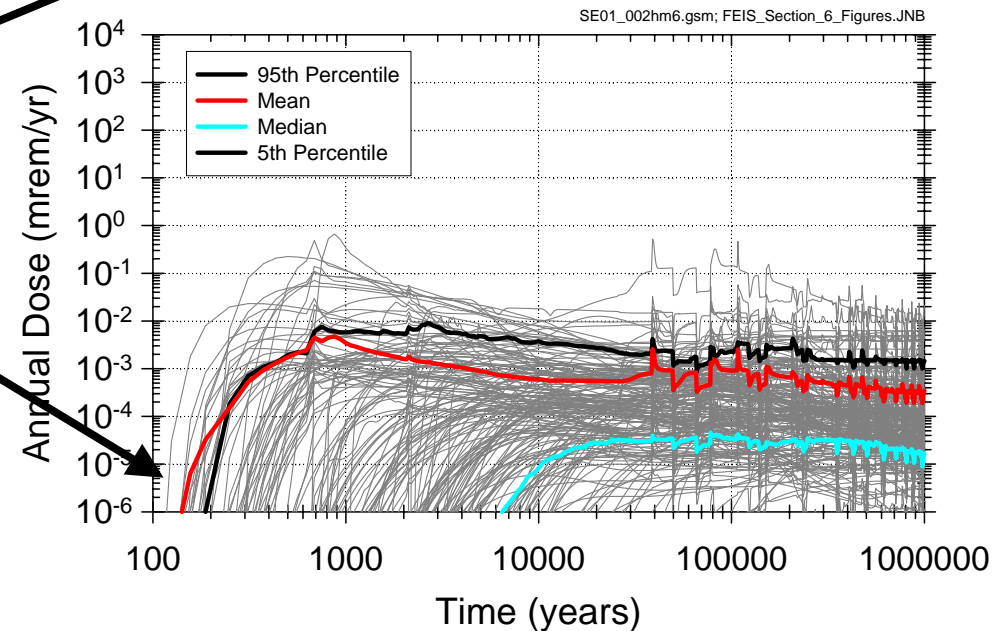
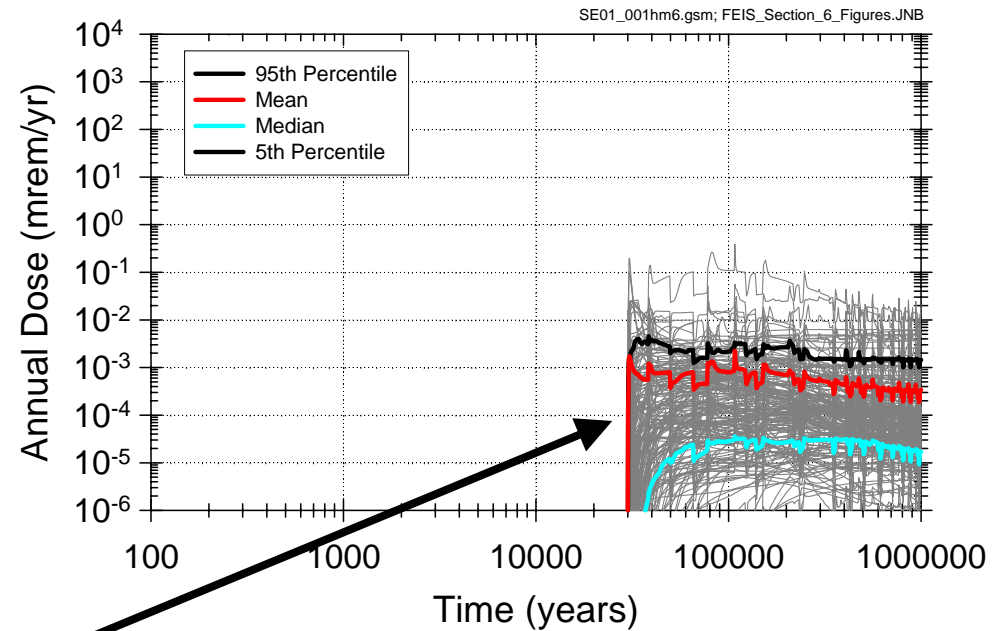
# Analyses for Igneous Activity Scenarios (HTOM/LTOM)

- **Updated for 40 CFR 197**
  - 18 km RMEI location
  - BDCFs updated
  - Other Features
- **Early dose greater than TSPA-SR, but dose decreases at later time**



# Analyses for Human Intrusion Scenarios

- Waste package has degraded enough so that driller would not recognize it
- Release from 1 waste package through borehole to saturated zone
- HI at 30,000 years
- Proposed NRC rule of HI at 100 years



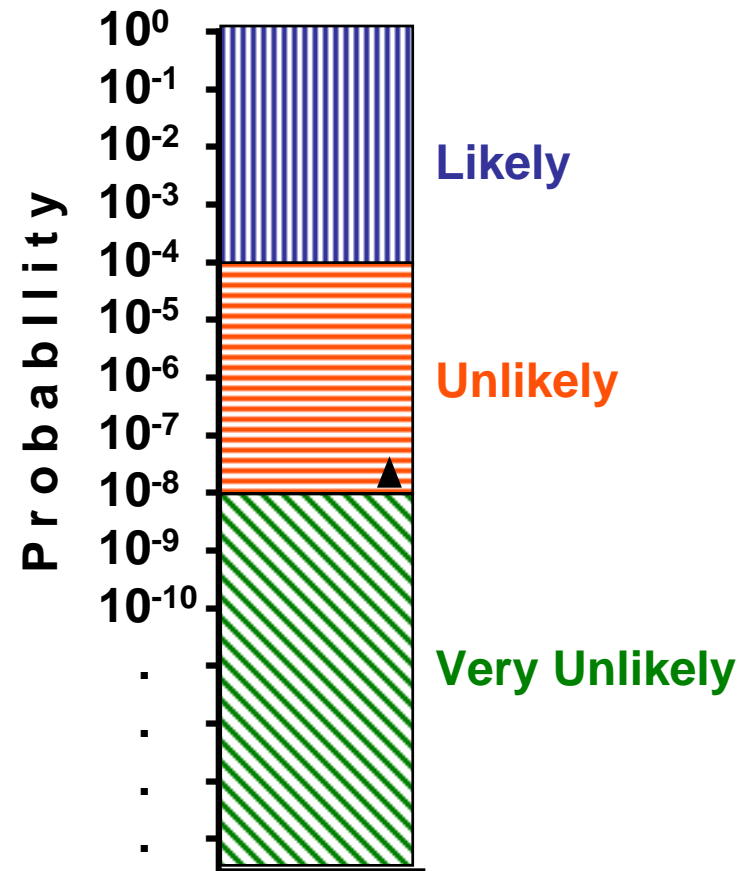
# Contents of TSPA Letter Report on Final NRC Rule (10 CFR Part 63)

- **Groundwater (GW) protection standard evaluation utilizing an unlikely igneous-intrusion scenario**
  - For both HTOM and LTOM
  - For total radium concentration, gross alpha concentration, and dose to critical organs
- **Individual protection standard for HI considering an unlikely igneous intrusion**
  - HI assumed to occur immediately after the igneous intrusion
- **Use of 3,000 Acre-ft per year water demand for individual protection standard calculation**
  - For dose calculation to the RMEI



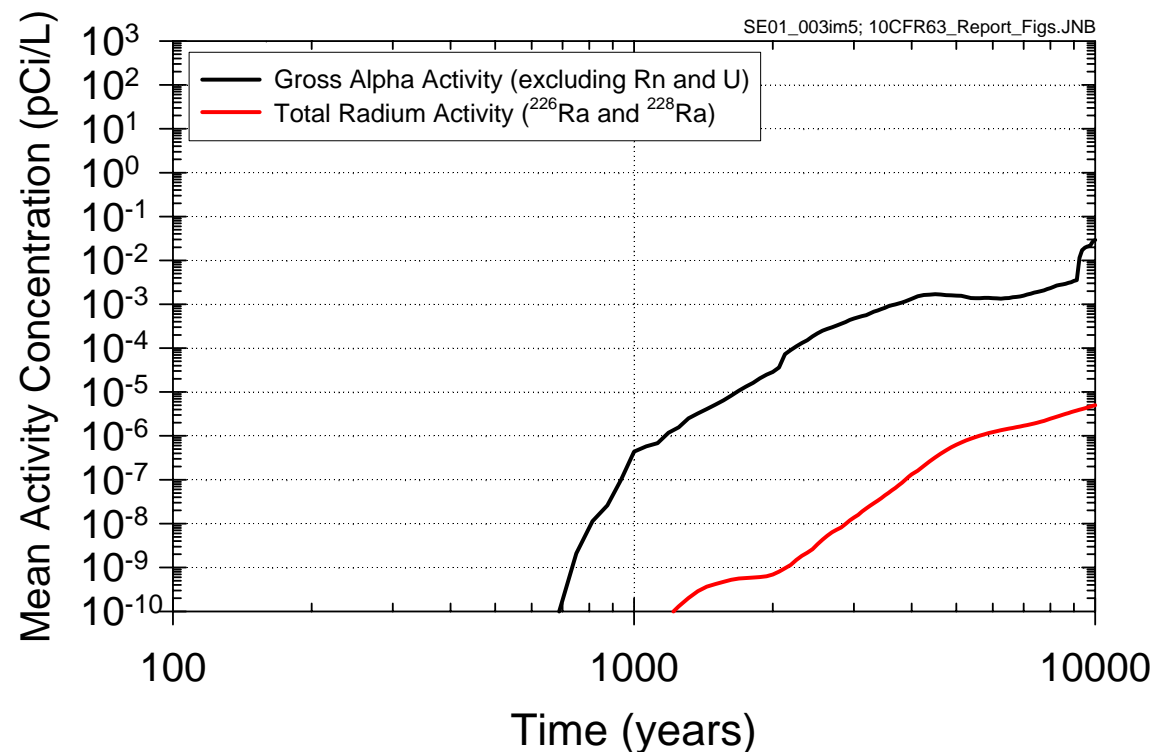
# Unlikely Events

- “Unlikely Features, Events & Processes (FEPs)” not defined in 10 CFR Part 63
- Definition of unlikely was expected to be between  $10^{-8}$  and  $10^{-4}$  per year at time of these analyses
- Mean annual probability of igneous intrusion at potential repository is  $1.6 \times 10^{-8}$  per year ( $\blacktriangle$ )
- HI considered to be very unlikely



# GW Protection Standard Evaluation With an Unlikely Igneous-Intrusion Scenario

- **Igneous intrusion disrupts waste packages leading to release to unsaturated zone and then to groundwater**
- **Calculated total radium concentrations are orders of magnitude lower than background (1.04 pCi/l)**
- **Calculated gross alpha concentrations are ~10 percent of background (0.4 pCi/l) for first 10,000 years**



# Scenario Logic for Human Intrusion after Igneous Event

- **Base case expects HI wouldn't occur until 30,000 years after closure**
  - Waste package could be degraded by corrosion processes sufficiently so that driller wouldn't recognize it (a hole is opened in the waste package)
- **Assumes an igneous event occurs that compromises some waste packages**
- **Assumes driller would not recognize the waste package after igneous disruption**
- **Consequence determined by multiplying the conditional dose, the probability of the initiating igneous intrusion event time, and the probability of the driller not detecting the waste package (assumed to be 1 in this case)**



# Individual Protection Standard for Human Intrusion with an Unlikely Igneous Intrusion

- Assume igneous intrusion probability sometime prior to 30,000 years is  $4.8 \times 10^{-4}$  (30,000 years  $\times$   $1.6 \times 10^{-8}$  per year)
- Assume HI at 100 years post-closure (max mean dose  $4.8 \times 10^{-3}$  mrem/yr)
- Approximate maximum mean dose for this case is  $2.3 \times 10^{-6}$  mrem/year
- Potential maximum mean dose due to HI preceded by igneous intrusion is concluded to be much lower than the maximum mean dose due to the igneous intrusion alone





# Use of 3,000 Acre-ft per year Water Demand on Individual Protection

- Prior to final NRC rule, water demand was approximately 2,000 acre-ft per year (range of 887 to 3367 acre ft per year)
- Final rule required use of 3,000 acre-ft per year
- Result was to scale the dose to the RMEI by approximately 2/3
- Peak mean annual dose for HTOM was reduced from  $1.7 \times 10^{-5}$  mrem/year to  $1.1 \times 10^{-5}$  mrem/year



# Summary

- **Additional analyses conducted to evaluate effect of finalized Environmental Protection Agency (EPA) and Nuclear Regulatory Commission (NRC) rules**
- **Analyses documented in letter reports (included in statewide Supplemental Hearings in December, 2001)**
- **Analyses supplemented other TSPA analyses conducted for SR**

