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ABSTRACT

This document supersedes revision A of N001SRR140127, "Proposed Sitewide Release Criteria for Remediation of Facilities at the SSFL" issued August 22, 1996. N001SRR140127 was submitted to the Department of Energy (DOE) and the California Department of Health Services (DHS) who subsequently approved the use of these criteria for release of radiological facilities at Rocketdyne for unrestricted use.

A complete set of release criteria for facilities at the SSFL has been developed, and are presented in this report. The various categories of release guidelines include; 1) annual expected dose, 2) soil and water concentration guidelines, 3) surface contamination guidelines, and 4) ambient gamma exposure rate. The guidelines were obtained from regulatory values where available. Where not available, for example for soil, guidelines were calculated by use of the DOE computer code, RESRAD. For these calculations, the annual dose limit is 15 mrem/year, which is consistent with proposed EPA and NRC guidelines and ALARA principles.

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FORM 734-C REV. 7-97

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1. INTRODUCTION

This document supersedes revision A of N001SRR140127, "Proposed Sitewide Release Criteria for Remediation of Facilities at the SSFL" issued August 22, 1996. N001SRR140127 was submitted to the Department of Energy (DOE) and the California Department of Health Services (DHS) who subsequently approved the use of these criteria for release of radiological facilities at Rocketdyne for unrestricted use. Copies of approval letters from DOE and DHS are included in Appendix B.

At several locations at the Santa Susana Field Laboratory (SSFL), low levels of radiological contamination in buildings and in soil have occurred and have been or will be cleaned up for eventual release for use without radiological restrictions. The DOE requirements for allowable residual radioactivity in sites suitable for release without radiological restrictions ("unrestricted release") are established in DOE Order 5400.5 (Ref. 1). Specific guidelines are given in 5400.5 for surface contamination and for direct gamma exposure. However, except for radium and thorium in soil, no specific guidelines are provided for residual contamination in soil or water. It became clear that a set of DOE-authorized limits for the SSFL would greatly facilitate the process of determining that a facility is acceptably clean, and verifying this with a confirmatory survey. Approval of such a set of authorized limits is provided for in DOE Order 5400.5, Chapter IV, Section 5, and in draft 10 CFR 834.301(c).

The purpose of this report is to document the set of approved guideline values for the release without radiological restriction of DOE facilities at the SSFL. The various categories of release guidelines include; 1) annual expected dose, 2) soil and water concentration guidelines, 3) surface contamination guidelines, and 4) ambient gamma exposure rate. The guidelines presented in this report are for residual radioactivity above background. When feasible, the local background activity of the suspect radionuclides should be determined and these background values subtracted from the measured release survey data.

The goal for these limits is to provide assurance that reasonable future uses of the property will not result in individual doses exceeding 15 millirem per year. This is consistent with current EPA and NRC guidance, and is supported by a generic cost-benefit analysis presented in Reference 2.

2. ANNUAL DOSE LIMITATION

DOE Order 5400.5 specifies a base Total Effective Dose Equivalent (TEDE) limit of 100 millirem per year for any potential future occupant of a remediated site. The Order also requires the use of the As Low As Reasonably Achievable (ALARA) principle to establish Authorized Limits at a level that is below the base limit. Rocketdyne will apply a value of 15 millirem per year for the calculation of derived limits for the cleanup of DOE sites at the SSFL, consistent with EPA and NRC guidance. A limit of 15 millirem per year (mrem/year) is adopted to assure that future uses will contribute small doses compared to natural background doses, which are in the range of 250-400 mrem/year (Ref. 3). This limit is considered to be as low as reasonably achievable below the basic DOE dose limit of 100 mrem/year. The 15 mrem/year value corresponds to a calculated increased lifetime cancer risk to a potential future user of the site of 3×10^{-4}.

For any reasonable assigned cost per person-rem, further reduction of anticipated dose due to exposure to residual radioactivity at the site is difficult to justify. For example, the EPA proposed TEDE of 15 mrem/year was arrived at after extensive ALARA analysis of cleanup costs and benefits at sixteen "Reference Sites" representing a wide range of conditions found at contaminated sites throughout the United States. Their analyses assumed a residential use of the decontaminated sites, and their conclusions were that the 15 mrem/year limit represented the most effective value considering all the technical and socio-political issues involved.

Furthermore, at the SSFL, conservative choices in the development, measurement, and interpretation of limits and final surveys provide a firm bias towards overestimation of the remaining risk. These include, 1) a conservative residential scenario for the pathway analyses, 2) use of calibration sources that tend to underestimate the detector efficiency for the likely contaminants, and 3) both qualitative and quantitative tests that provide assurance that the decommissioned facility is suitable for release without radiological restrictions.

3. SOIL AND WATER GUIDELINES

Since there are no federal or state regulatory limits for soil contamination for many of the potential or actual radionuclides of concern at SSFL, site-specific guidelines must be developed. This development is done, as required by the DOE Order, by use of a "pathways" analysis program, which estimates the radiological dose (total effective dose equivalent) that a future user of the property might receive, considering the residual radioactivity and various conditions of use. An effort is made to make these use conditions as reasonable for the use and the local area as can be achieved, without greatly over-estimating or under-estimating potential doses.

To establish these guidelines for cleanup operations at SSFL, the pathways analysis program RESRAD (Ref. 4), developed at Argonne National Laboratory (ANL) for use by DOE, has been used to calculate single radionuclide guidelines for the radionuclides of potential concern at SSFL.

For soil, a dose limit of 15 millirem per year is used. For consideration of radiological contamination in water, which may be collected from wells, sumps, below-grade seepage, or surface water, concentration guidelines were calculated from the Dose Conversion Factors (DCFs) in RESRAD, using the EPA limit of 4 millirem per year for ingested drinking water (Ref. 5), and the EPA assumed intake of water, 2 liters per day. These limits are more restrictive than those imposed on releases from operating facilities, as provided by DOE Order 5400.5 (Ref. 1), NRC (Ref. 6), the State of California (Ref. 7), and EPA for uranium mines and mills (Ref. 8).

3.1 Pathway Analysis

Pathways analysis involves calculating the doses received by a person through several pathways: direct radiation exposure; inhalation of airborne radioactivity; drinking water containing radioactivity; eating foods that have accumulated radioactivity, through uptake of water with radioactivity from the soil, or with airborne radioactivity deposited on the foliage; and ingestion of small amounts of contaminated soil.

The pathways analysis program RESRAD, was developed in the late 1980's for DOE by Argonne National Laboratory for the purpose of performing pathways analysis for a broad range of applications. Considerable flexibility is provided in the program for representing the site-specific conditions of exposure, to permit making the calculation as reasonable for the application as is possible.

Four general types of use may be considered for land for the purpose of calculating dose, other than the obvious zero-dose case of non-use. These may be identified as the industrial scenario, the wilderness scenario (or recreational, such as a park or golf course), the residential scenario, and the family farm scenario. Within these general use scenarios, choices are made for occupancy time (indoors and outdoors), water use, and food sources. Further choices are made to represent the contamination situation, geology, and hydrology. The program comes with a complete set of generally conservative default values, and these may be changed as appropriate to reflect local reality in terms of usage practices and physical conditions, to produce a realistic pathways analysis for the specific site. The default values and the values actually used by the program in the analysis are listed in the output for each calculation, so departures from the default set are well recorded. The printed results from the calculations described in this report are stored in the Radiation Safety library file.

The family farm, on which family members spend 100% of their time, drinking water from the surface or from wells, eating vegetables and fruit grown on the land and irrigated with the same water, raising their meat, milk, and fish on that land, is not a reasonable scenario for the site. Although commercial farming is practiced in low-lying valley and coastal areas west of the facility, the rugged nature and topography of the SSFL, combined with poor soil quality, would reasonably preclude a family farm activity on the site. Further, recent land use trends in the area have been to conversion of previous farming property to other non-farming uses. Thus, the industrial, wilderness, and residential scenarios are all perhaps equally probable for the future of the site, and should be the scenarios considered.

3.2 Property Usage Scenarios

The basic usage conditions (per year) modeled in these calculations, for each of the three realistic scenarios, are summarized in Table 1. A complete listing of all RESRAD input data, for the three scenarios, is given in Appendix A. Discussion on specific RESRAD input parameters is given below in Section 3.3

Table 1. Property Usage Conditions for Three Realistic Scenarios

	Industrial	Wilderness	Residential
Occupancy, indoors (hours/year)	1752	0	4380
Occupancy, outdoors (hours/year)	350	876	2190
Occupancy, off site (hours/year)	6664	7890	2190
Drinking water (liters/year)	0	0	510
Fruit, vegetables, grain (kg/year)	1.6	1.6	16
Leafy vegetables (kg/year)	0	0	1.4
Cover thickness (meters)	0	0	0
Contamination area (m^2)	10000	10000	10000
Contamination thickness (meters)	1	1	1
Depth to water table (meters)	5	5	5

3.3 RESRAD Input Parameters

Default values provided in RESRAD are considered to be conservative estimates intended for use when no site-specific information is available. Users of the program are encouraged, however, to use input data that most closely reflects actual conditions existing on their site. As part of several earlier efforts at the SSFL, a number of screening evaluations were performed using the RESRAD code to determine which of the approximately 80 input parameters required by RESRAD were of significance to the general SSFL area. These screening evaluations also were useful in determining conservative site-specific values for input to the code, when the default values were not used. In general, changes to most of the parameters were found to have a negligible effect on the final results because certain dose pathways were either not applicable or negligible for the given scenarios.

Contaminated Zone Parameters: Default values for the area of contamination (10,000 m^2) and the length parallel to aquifer flow (100 m) were assumed. For the depth of contamination, a conservative value of 1 meter is assumed. Measurements conducted at the site have indicated historical maximum values ranging from about 0.4 to 0.6 m for this parameter.

Occupancy Parameters: The default RESRAD values for occupancy of a residence on an affected site are 50% of the time spent indoors and 25% of the time spent outdoors, on the site. Thus, 25% of the time the occupancy is assumed to be off site. For the residential scenario, assuming 8,760 hours in a year, this translates into 4,380 hours spent indoors, 2,190 hours spent outdoors on the site, and 2,190 hours spent off site. For the industrial scenario, the corresponding percentages are assumed to be 20%, 4%, and 76% respectively. For the wilderness scenario, the corresponding percentages are 0%, 10%, and 90%.

Shielding Factors: The annual dose estimates calculated by RESRAD from either direct exposure or by inhalation (dust) are functions of two "structural" shielding parameters and the fraction of time an individual is assumed to spend inside a structure built on the site. Both shielding factors range from 0 to 1, and may be changed by the user to more appropriately match actual site conditions. For inhalation, the RESRAD default is 0.4, and this value is assumed for the present evaluations. For direct gamma exposure, the RESRAD default is 0.7, which is a rather conservative estimate of gamma shielding by a structure. For the present calculations, this latter value was adjusted from the default, for both the industrial and residential scenarios, to account for local construction practice which dictate a minimum 4-inch (0.1 m) concrete slab under the structure.

The gamma shielding factor used as input to RESRAD was calculated by modeling a typical two-story residential structure, and a single story industrial structure using the computer code MicroShield[1]. MicroShield is a point-kernel gamma shielding code developed for IBM-compatible personal computers, based on the mainframe code ISOSHLD. For the residential structure, a conservative lower bound footprint (area) value of 93 m^2 (1,000 ft^2) was assumed. For the industrial structure, a 186 m^2 (2,000 ft^2) area was assumed. A circular area was used with MicroShield to obtain maximum code accuracy with minimum computational time. Screening

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[1] MicroShield, Version 4.0, Grove Engineering, Inc., 15215 Shady Grove Road, Suite 200, Rockville, MD 20850.

calculations indicated no significant differences between the results for circular and square areas of the same volume.

In all cases the contaminated soil was assumed to have a density of 1.5 g/cm^2, and a thickness of 1 meter. Dose calculations were performed for two vertical distances (1m for the ground floor and 3.6 m for the second story) and for three radial distances (center, midpoint, and edge of structure). The isotopic mix input to MicroShield was the same as that used for the present RESRAD calculations, with a concentration of 1 pCi/g for each isotope. Resulting gamma energy groups for this isotope mix ranged from 0.1 to 1.5 MeV. A factor of 0.89 was used to account for gamma shielding from a typical structural wall composed of approximately 1 inch of stucco and 5/8 inch of drywall, and a window area of approximately 10% of the wall area.

Effective gamma shielding factors obtained from the MicroShield calculations are given in Appendix A. For the residential scenario (the most credible), it is assumed that 12 hours are spent inside the structure per day. If it is further assumed that 8 of these hours are spent upstairs in a bedroom, 4 hours are spent downstairs in a family room, and that a person (on average) is located at the midpoint between the center and the edge of the structure, then the effective gamma shielding factor would be: (0.67)(0.61) + (0.33)(0.31) = 0.51. For the industrial scenario, the value is 0.25, which is the shielding value at the midpoint location for the single story structure.

Table 2. Gamma Shielding Factor Calculations for Typical SSFL Structure

	Gamma Shielding Factor	
Radial Location	**1st Floor**	**2nd Floor**
Residential Structure (93 m^2 footprint, two story)		
Center	0.27	0.57
Midpoint[a]	0.31	0.61
Perimeter[b]	0.57	0.71
Industrial Structure (186 m^2 footprint, single story)		
Center	0.22	-
Midpoint[a]	0.25	-
Perimeter[b]	0.58	-

[a]Midpoint between the center and the perimeter of the structure
[b]Edge of the structure.

It should be noted, that these values do not take into account any out-structures such as garages and patios, both of which would result in additional gamma shielding, and both of which would almost certainly be part of any residences built on the site.

Dietary Parameters: Default RESRAD input values for food and water consumption are based on the family farm scenario, where a significant portion of the diet is grown or raised on the site. For the three credible scenarios considered here, these parameters were adjusted as follows: for the residential scenario, it is conservatively assumed that a small fraction (10% of that grown on a family farm) of the fruit and leafy vegetables consumption would be from material grown on site. The values used are 16 kg/year per person and 1.4 kg/year per person, respectively. It was further assumed that water for the residence would be obtained from a well on the site (510 liters/year per person).

For the industrial and wilderness scenarios, it was assumed that no water would be used that was taken from the site; thus, all water pathways were suppressed with the exception of a secondary pathway via plant ingestion. In the industrial case, bottled drinking water is supplied. Since essentially all surface water at present is a result of the current industrial operations, no surface water would be available in the wilderness scenario. It is also assumed that perhaps 1% of the family farm fruit consumption value might be collected from wild sources, thus, 0.14 kg/year is used for these scenarios.

Contaminated Zone Hydrology Data: The SSFL facility is located in the Simi Hills in eastern Ventura County, California. The Simi Hills are in the northern part of the Transverse Range geomorphic province, and are composed primarily of exposures of the Upper Cretaceous Chatsworth Formation. This formation is a marine turbidite sequence of sandstone with interbedded siltstone/mudstone and minor conglomeratic lenses. The Chatsworth Formation is at least 1,800 m thick in locations east and north of the Facility.

The principal geologic units at the SSFL are the Chatsworth Formation and the shallow alluvium which overlies the Chatsworth Formation in some parts of the Facility, notably in Area IV of the SSFL where the decommissioning and decontamination of nuclear sites is taking place. This layer is Quaternary alluvium consisting of mixtures of unconsolidated sand, silt, and clay, and would include the contaminated zone. Drill holes indicate that the layer may be as thick as 6 meters in some locations.

The density of this alluvium layer is approximately 1.5 g/cm^3. The total and effective porosity of the contaminated zone are assumed to be 0.43 and 0.20 based on the average of data for sand, silt, and clay as given in the RESRAD manual. Precipitation at the facility is measured annually by a rain gauge located in the northeastern portion of the SSFL (Ventura County Rain Gauge Number 249). Based on measured data since 1959, the mean annual precipitation at the SSFL is approximately 18.6 inch, or 0.47 meters. In general, the majority of the precipitation occurs during the months of January through March.

Saturated Zone Hydrology Data: There are two groundwater systems at the SSFL: 1) a shallow system in the surficial alluvium and the underlying zones of weathered sandstone and siltstone/claystone, and isolated shallow fracture systems; and 2) a deeper regional system in the fractured Chatsworth Formation. The shallow zone is discontinuous, with depths to groundwater ranging from land surface to over 9 m. For the present study, we assume that this shallow region most conservatively represents the saturated zone, with an average depth to the water table of about 5 m. Hydraulic conductivity in the saturated zone generally ranges from about 30 to 3,000 m/year. Here, the higher value has been assumed.

Typical pumping rates for deep wells in the Chatsworth Formation (rock) range from 60 to 70 m^3/year up to a maximum of about 300 m^3/year. For the shallow (alluvium) region, however, pumping rates are significantly lower, typically about 35 m^3/year. Further, in the shallow region, many wells would be dry for a good fraction of the year as the replenishment rate is generally low. Water table drop rates, therefore, would range up to 10 m as a result of on-site pumping. Without pumping, however, no data is available on any inherent lowering of the water table. For conservatism, therefore, the default value of 0.001 m/year has been assumed.

Radon Pathway: Two default values were modified for the radon pathway. The thickness of the foundation was set at 0.1 m (4 inches) to correspond to the gamma shielding calculations discussed above. Also, the depth below ground surface was also set at 0.1 m, as basement structures are not typical for the local area.

3.4 Calculated Soil and Water Guidelines from RESRAD

The guidelines calculated from the RESRAD code for various single radionuclides are listed in Table 3 for comparison of the three scenarios. Values for each of the scenarios were determined from separate RESRAD calculation runs using the input parameters given in Appendix A. Water guideline values in Table 3 were calculated from the dose conversion factors used in RESRAD for ingestion, using an EPA value of 2 liters/day total water consumption (per person) from the site, and an EPA dose limit of 4 mrem/year (Ref. 5).

For radionuclides specifically regulated by the EPA (and the State of California), the Safe Drinking Water Act (and CCR Title 22) limits were used. These are (in pCi/l):

H-3	20,000
Combined Ra-226 and Ra-228	5
Sr-90	8
Gross alpha (not including radon and uranium)	15
Gross beta	50
Uranium (U-234 + U-235 + U-238)	20

For U-234, U-235, and U-238, DOE imposes the EPA regulations in 40 CFR 192 (and parts 190 and 440). Similarly, for Ra-226, Th-228 and Th-232, DOE imposes the limits in DOE Order 5400.5.

3.5 Soil and Water Guidelines

Based on the data in Table 3, conservative guidelines, consistent with the several applicable regulations governing residual radioactivity discussed above, are listed in Table 4. With the exception of uranium, radium, and thorium, the soil guidelines are those calculated from RESRAD for the residential use scenario. For uranium, the guidelines are those adopted by the NRC (30, 30, and 35 pCi/g for U-234, U-235, and U-238, respectively, see Ref. 9). For

Table 3. RESRAD-Calculated Single Isotope Guideline Values

	Soil Guidelines (pCi/g)			
Radionuclide	Industrial	Wilderness	Residential	Water (pCi/l)[a]
Am-241	120	162	5.44	1.50
Co-60	10.9	9.83	1.94	204
Cs-134	18.7	16.9	3.33	74.7
Cs-137	51.9	46.7	9.20	110
Eu-152	25.3	22.8	4.51	845
Eu-154	23.0	20.7	4.11	573
Fe-55	2,370,000	4,780,000	629,000	9,020
H-3	129,000	129,000	31,900	85,600[b]
K-40	162	147	27.6	294
Mn-54	34.4	30.9	6.11	1,980
Na-22	13.0	11.7	2.31	476
Ni-59	1,390,000	1,560,000	151,000	26,100
Ni-63	511,000	572,000	55,300	9,490
Pu-238	140	192	37.2	1.71
Pu-239	127	175	33.9	1.55
Pu-240	127	175	33.9	1.55
Pu-241	4,740	6,430	230	79.9
Pu-242	133	183	35.5	1.63
Ra-226	0.520	13.6	0.199	4.12[b]
Sr-90	370	376	36.0	35.8[b]
Th-228	14.8	14.7	2.81	6.78
Th-232	7.94	7.98	1.53	2.01
U-234	519	647	106	19.3[b]
U-235	163	160	32.1	20.5[b]
U-238	399	445	90.9	20.4[b]

[a]Water guidelines calculated from RESRAD ingestion dose conversion factors, assuming the EPA dose limit of 4 mrem/year (see text).

[b]For these radionuclides, the EPA Safe Drinking Water Act or the State of California CCR Title 22 limits should be used (see Table 4).

Table 4. Soil and Water Guidelines for SSFL Facilities

Radionuclide	Soil Guidelines (pCi/g)	Water (pCi/l)
Am-241	5.44	1.5
Co-60	1.94	200
Cs-134	3.33	75
Cs-137	9.20	110
Eu-152	4.51	840
Eu-154	4.11	570
Fe-55	629,000	9,000
H-3	31,900	20,000[a]
K-40	27.6	290
Mn-54	6.11	2,000
Na-22	2.31	480
Ni-59	151,000	26,000
Ni-63	55,300	9,500
Pu-238	37.2	1.7
Pu-239	33.9	1.6
Pu-240	33.9	1.6
Pu-241	230	80
Pu-242	35.5	1.6
Ra-226	5[c] and 15[c]	4.1
Sr-90	36.0	8[a]
Th-228	5[c] and 15[c]	6.8
Th-232	5[c] and 15[c]	2.0
U-234	30[b]	
U-235	30[b]	total uranium 20[a]
U-238	35[b]	
Gross alpha (not including radon and uranium)		15[a]
Gross beta		50[a]

[a]State of California Maximum Contaminant Levels, CCR Title 22
[b]Generally more conservative NRC limits for uranium isotopes are used.
[c]DOE Order 5400.5 limits are used (5 pCi/g averaged over first 15 cm of soil depth and 15 pCi/g averaged over 15 cm layers below the top 15 cm).

radium and thorium, DOE Order 5400.5 limits are used (5 pCi/g averaged over first 15 cm of soil depth and 15 pCi/g averaged over 15 cm layers below the top 15 cm, see Ref. 1). Guidelines established from the residential use scenario are the most restrictive of the three scenarios considered.

The choice of a basic dose limit of 15 mrem/year for all pathways combined leads to lower limits than would result from the use of the dose limits established by the EPA for the uranium fuel cycle (Ref. 10) and by DOE for unrestricted release of contaminated property (Ref. 1). The water guidelines are those calculated from the RESRAD dose conversion factors, using the EPA values for the basic dose limit and daily water intake, with the Maximum Contaminant Levels (MCL) specified for certain radionuclides by the State of California (Ref. 11).

4. SURFACE CONTAMINATION GUIDELINES

Surface contamination limits are specified in Figure IV-1 of Chapter IV in DOE Order 5400.5. For SSFL facilities, these limits have been modified by specifying the potential contaminants present in the Rocketdyne facilities, and eliminating those that are not pertinent. The proposed guidelines are given in Table 5. As used in this table, dpm (disintegrations per minute) means the rate of emission by radioactive material as determined by correcting the counts per minute measured by an appropriate detector for background, efficiency, and geometric factors associated with the instrumentation.

Table 5. Surface Contamination Guidelines for SSFL Facilities

Radionuclide	Average over 1 m^2 ($dpm/100\ cm^2$)	Maximum in 100 cm^2 ($dpm/100\ cm^2$)	Removable ($dpm/100\ cm^2$)
Plutonium, Radium	100	300	20
Thorium	1,000	3,000	200
Uranium	5,000	15,000	1,000
Mixed fission products	5,000	15,000	1,000
Activation products	5,000	15,000	1,000
Tritium	-	-	10,000

As included in Table 5, Pu, Ra, U, Th, mixed fission products, and activation products, refer to those forms of radioactive material that comprise the residual activity at the SSFL. Plutonium is predominately Pu-239; Radium is Ra-226. It is assumed that thorium is sufficiently aged that all daughters are in equilibrium, Th-natural. Uranium will occur in depleted, normal, or enriched forms; U-233 is not present. Mixed fission products include Sr-90 and Cs-137 as components of the mixture. Possible activation products include Co-60, Fe-55, Mn-54, Eu-152, Eu-154, Al-26, and similar radionuclides.

Tritium contamination limits are based on interim guidelines for removable surface contamination (Ref. 12). This level of removable contamination insures that any non-removable or volumetric contamination will not cause unacceptable exposures.

These guidelines will be imposed for accessible (or potentially accessible) surfaces and structures.

5. AMBIENT GAMMA EXPOSURE RATE

A guideline of 5 μR/hr above natural background, measured at 1 meter above the surface, is used. This value has been imposed by the NRC for decommissioning research reactors (Ref. 13). It is as low as reasonably measurable, due to variations in background, and is significantly lower than the guideline of 20 μR/hr stated in DOE Order 5400.5, Chapter IV, Section 4.c. This guideline is imposed for accessible (or potentially accessible) structures and land. Our experience has been that this level can be achieved and verified in facilities that would be suitable for continued use.

6. APPLICATION OF GUIDELINES

Note: The survey protocols described below were those employed at the time of issue of N001SRR140127 and have been in use up until the end of 1998. As of the beginning of 1999, MARSSIM protocols will be employed (Reference 19) utilizing the guidelines developed in this report as the DCGL$_W$s (derived concentration guideline limits).

The guidelines presented above should be used in planning any decontamination effort at the SSFL. Analytical capability for detection of each radionuclide should be, if possible, less than one-tenth of the guideline values. That is, the Minimum Detectable Activity (MDA, our LLD) should be less than 0.1 x guideline. Field measurements used to direct removal of contaminated soil should be capable of practical measurements below the guideline value. Survey measurements and sample analyses should be corrected for the local background activity of each radionuclide.

6.1 Soil Guidelines

Sample analysis is necessary to demonstrate the successful decontamination of soil areas. A qualitative scan will be performed using gamma-sensitive and/or beta-sensitive detectors to identify any significant areas of residual contamination. Soil samples will be taken from locations based on a 3x3 meter master grid. One sample will be taken from within a 1x1 meter grid location in each 3x3-meter section, based either on the qualitative scan survey indications at the area of maximum readings or, if no noticeable readings were found, at the location most likely to have residual contamination, by the surveyor's judgment. This selection assures a reasonably uniform sampling of the ground areas, at a sample density of approximately 11 samples per 100 m^2.

Results from individual samples will be compared with the limit for hotspots of 9-m^2 area, that is, 3.3 x the adopted concentration limit. Averages of adjacent samples, covering 100 m^2, will be compared with the average limit. The overall average, assuming that the individual and 100-m^2 area averages satisfy the applicable limits, will be used for a RESRAD confirmatory calculation. This calculation will be performed to demonstrate that the maximum expected annual dose for the indicated reasonable use scenario for the facility *does not exceed* the proposed 15 mrem/year guideline value.

For mixtures of radionuclides in soil, the "Sum of Fractions" rule is used. The sum of the ratios of concentration of each radionuclide to the corresponding guideline must not exceed 1. This value must be satisfied when samples are averaged over each 100-m^2 region. For cases in which the relative concentrations are known or assumed, this method is used to generate combined radionuclide guidelines for each radionuclide in the mixture.

The guidelines are not intended to be spot limits, and should not be applied to individual measurements. If the specific sampling provides only (or fewer than) one measurement per 100-

m^2 area, each measurement becomes, by default, the "average" for that 100-m^2 area, and the guidelines have the effect of acting as spot limits. In cases where an individual sample exceeds the guideline value, additional samples should be taken from within the same 100-m^2 area, and used to define the average contamination in this area.

The maximum concentrations remaining as "hot spots" must have contamination less than that calculated by the hot-spot rule presented in DOE Order 5400.5, Chapter IV, page 4. The average contamination within any area not exceeding 25 m^2 shall not be greater than $\sqrt{100 / A}$ guideline, where A is the area in m^2. Reasonable efforts shall be made to remove any soil with contamination that exceeds 30 x guideline (Ref. 4).

6.2 Surface Contamination Guidelines

The proposed surface contamination guidelines would be applied to all accessible surfaces and structures. This would include ceilings, floors, and walls, and other potentially accessible locations such as attics. Where surface contamination by both alpha- and beta-gamma-emitting radionuclides exists, the guidelines established for alpha- and beta-gamma-emitting radionuclides should apply independently. Measurements of average contamination are averaged over an area of 1 m^2. For objects of less surface area, the average should be derived for each such object. The maximum contamination level applies to an area of not more than 100 cm^2. Surfaces of facilities which are likely to be contaminated, but are inaccessible for purposes of measurement, shall be presumed to be contaminated in excess of the applicable limits.

Following a complete qualitative scan of the facility, quantitative surface contamination measurements will be made over a fraction of the structural surfaces, as determined by the designation of the area as affected or unaffected. Affected areas will be surveyed at a nominal fraction of 11%. Unaffected areas will be surveyed at lesser fractions. Locations for the quantitative survey measurements will be based on a 3x3 meter master grid. One sample will be taken from within a 1x1 meter grid location in each 3x3-meter section, based either on the qualitative scan survey indications at the area of maximum readings or, if no noticeable readings were found, at the location most likely to have residual contamination, by the surveyor's judgment. Results from individual locations will be compared with the applicable limits.

Total surface contamination is measured by use of detectors primarily or exclusively sensitive to alpha or beta-gamma radiation. After a qualitative survey of the surfaces of the entire subject area, quantitative measurements are made on 1-m^2 areas selected uniformly throughout the area. These measurements are made with the detectors connected to a scaler set to accumulate counts for a 5-minute period. The detector is slowly scanned over the 1-m^2 grid location and the numerical result, after correction for background, count time, and detector efficiency, yields the 1-m^2 average surface activity. These detectors are calibrated against Th-230 for alpha activity and Tc-99 for beta activity. The emission energies of these radionuclides is generally less than those radionuclides found as contamination at SSFL. This results in an underestimate of the efficiency of the detectors for the actual contaminant radioactivity and hence an overestimate of the actual measurement.

The amount of removable activity per 100 cm^2 of surface area is determined by wiping an area of that size with dry filter or soft absorbent paper, applying moderate pressure, and measuring the amount of radioactive material on the wiping with an appropriate instrument of known efficiency. Typically at Rocketdyne, a low background gas flow proportional counter is used. When removable contamination on objects of surface area less than 100 cm^2 is determined, the activity per unit area should be based on the actual area and the entire surface should be wiped. It is not necessary to use wiping techniques to measure removable contamination levels if direct scan surveys indicate that the total residual surface contamination levels are within the guidelines for removable contamination.

Smear methods for tritium detection are similar to that described above, with the exception that a wet swipe or piece of Styrofoam should be used. If the property has been recently decontaminated, a follow-up measurement (smears) should be conducted to ensure that there is no build-up of contamination with time.

6.3 Ambient Gamma Exposure

Measurements of the ambient gamma exposure rate provides a useful determination of residual volumetric radioactivity that may not be as easily detected by surface measurements or sampling and analysis. For the purpose of demonstrating suitability for release, this measurement provides an additional test.

The DOE established a limit of 20 μR/hr above natural background for screening radium-contaminated property. The NRC has imposed a 10μR/hr limit on the decommissioning of radioactive materials licensees, and a 5μR/hr limit on the decommissioning of research reactors. The 5 μR/hr limit above natural background is proposed for use at Rocketdyne. Because of the variability and differences in natural background, the limit of 5 μR/hr is about as low as can be reasonably implemented.

Quantitative measurements of the ambient gamma exposure rate will be made over a fraction of the structural surfaces, as determined by the designation of the area as affected or unaffected. Affected areas will be surveyed at a nominal fraction of 11%. Unaffected areas will be surveyed at lesser fractions. Locations for the quantitative survey measurements will be based on a 3x3-meter master grid. One measurement, covering one 1-m^2 grid location, will be made at each grid location chosen for the surface contamination measurements. Results from individual locations will be compared with the applicable limits.

At Rocketdyne, gamma exposure rate is generally measured by use of a 1x1 inch NaI(Tl) detector/photomultiplier probe, connected to a scaler to provide objective numerical values. The detector is placed 1 meter above the local (ground or floor) surface. This instrument is calibrated by reference to a High Pressure Ion Chamber (HPIC) in a background area.

6.4 Statistical Validation of Survey Data

The statistical approach employed at Rocketdyne/ETEC for establishing that survey data meets guideline values is a method referred to as Sampling Inspection by Variables (Ref. 14). This method has been widely applied in industry and the military and is essential where the lot size is impractically large. Application of this method to the remediation of contaminated sites has been discussed in detail elsewhere (see for example, Ref. 15).

In sampling inspection by variables, the number of data points on which measurements are obtained is first chosen to be large so that the parameters of the distribution are likely to have a normal distribution (i.e., Gaussian). The mean of the distribution, $\bar{x}$, and its standard deviation, s, are then related to a "test statistic", TS, as follows:

$$TS = \bar{x} + ks$$

where

$\bar{x}$ = average (arithmetic mean of measured values)
s = observed sample standard deviation
k = tolerance factor calculated from the number of samples to achieve the desired sensitivity for the test

TS and $\bar{x}$ are then compared with an authorized acceptance limit, U, to determine acceptance or other plans of action, including rejection of the area as contaminated and requiring further remediation.

The sample mean and standard deviation are easily calculable quantities; the value of k, the tolerance factor, bears further discussion. Of the various criteria for selecting plans for acceptance sampling by variables, the most appropriate is the method of Lot Tolerance Percent Defective (LTPD), also referred to as the Rejectable Quality Level (RQL). The LTPD is defined as the poorest quality that should be accepted in an individual lot. Associated with the LTPD is a parameter referred to as consumer's risk (β), the risk of accepting a lot of quality equal to or poorer than the LTPD (or 10%). NRC Regulatory Guide 6.6 (Ref. 16) states that the value for the consumer's risk should be 0.10. Conventionally, the value assigned to the LTPD has been 10%.

The State of California, Department of Radiological Health Branch, has stated that the consumer's risk of acceptance (β) at 10% defective (LTPD) must be 0.1 (Ref. 17). For those choices of β and LTPD, $K_\beta = K_2 = 1.282$. The number of samples is n. Values of k for each sample size are calculated in accordance with the following equations:

$$k = \frac{K_2 + \sqrt{K_2^2 - ab}}{a}; \quad a = 1 - \frac{K_\beta}{2(n-1)}; \quad b = K_2^2 - \frac{K_\beta^2}{n}$$

where k = tolerance factor,
K_β = the normal deviate exceeded with probability of β, 0.10 (from tables, $K_2 = 1.282$, see Ref. 18),
K_2 = the normal deviate exceeded with probability equal to the LTPD, 10% (from tables, $K_\beta = 1.282$, see Ref. 18)[2], and
n = number of samples.

The statistical criteria for acceptance of a remediated area are presented below.

a) Acceptance: If the test statistic ($\bar{x} + ks$) is less than or equal to the guideline (U), accept the area as clean. If any single measured value exceeds 80% of the limit, decontaminate that location to as near background as is possible, but do not change the value in the analysis.

b) Collect additional measurements: If the test statistic ($\bar{x} + ks$) is greater that the limit (U), but $\bar{x}$ itself is less than U, independently resample and combine all measured values to determine if $\bar{x} + ks \leq = U$ for the combined set; if so, accept the area as clean. If not, the area is contaminated and must be remediated.

c) Rejection: If the test statistic ($\bar{x} + ks$) is greater than the limit (U) and $\bar{x} > = U$, the region is contaminated and must be remediated.

Thus, based on sampling inspection, we are willing to accept the hypothesis that the probability of accepting an area as not being contaminated which is, in fact, 10% or more contaminated is 0.10. Or in other words, the final survey acceptance criteria corresponds to assuring with 90% confidence that 90% of an area has residual contamination below 100% (a 90/90/100 test) of the authorized limit.

7. REFERENCES

1. "RADIATION PROTECTION OF THE PUBLIC AND ENVIRONMENT," DOE Order 5400.5, U. S. Department of Energy, February 8, 1989.
2. "Regulatory Impact Analysis for Radiation Site Cleanup Proposed Rule - Draft", U. S. Environmental Protection Agency, January 17, 1996.
3. "Health Effects of Exposure to Low Levels of Ionizing Radiation -- BEIR V," Committee on the Biological Effects of Ionizing Radiations, Board on Radiation Effects Research, Commission on Life Sciences, National Research Council. National Academy Press, Washington, 1990.
4. "A Manual for Implementing Residual Radioactive Material Guidelines," DOE/CH/8901, U. S. Department of Energy, June 1989.
5. "National Primary Drinking Water Regulations; Radionuclides," 40 CFR 141.15 and .16, U. S. Environmental Protection Agency, July 18, 1991.
6. "STANDARDS FOR PROTECTION AGAINST RADIATION," 10 CFR 20, U. S. Nuclear Regulatory Commission.
7. "CALIFORNIA RADIATION CONTROL REGULATIONS," CCR 17, State of California Department of Health Services.
8. "ORE MINING AND DRESSING POINT SOURCE CATEGORY," Subpart C--Uranium, Radium and Vanadium Ores Subcategory, 40 CFR 440, U. S. Environmental Protection Agency.
9. "Disposal or Onsite Storage of Thorium or Uranium Wastes from Past Operations," Federal Register . Vol. 46, No. 205, pp. 52061-52063, Friday, October 23, 1981. U. S. Nuclear Regulatory Commission.
10. "ENVIRONMENTAL PROTECTION STANDARDS FOR NUCLEAR POWER OPERATIONS," 40 CFR 190, U. S. Environmental Protection Agency.
11. "Environmental Health, Radioactivity," CCR 22, Article 5. State of California Department of Health Services.
12. "Application of DOE 5400.5 Requirements for Release and Control of Property Containing Residual Radioactive Material", DOE Memorandum, DOE-OAK, January 5, 1996.
13. "Order Authorizing Dismantling of Facility and Disposition of Component Parts", Docket No. 50-375, Enclosure to NRC Letter dated February 22, 1983, D. Eisenhut to M. Remley.
14. DOE/CH/8901, A Manual for Implementing Residual Radioactive Material Guidelines, T. L. Gilbert, et al., June 1989.

15. "Statistical Treatment of Radiological Survey Data for Cleanup Decisions and Regulatory Compliance", Proc. Spectrum '92 Conference, Boise, Idaho, August 23 - 27, 1992.

16. "Acceptance Sampling Procedures for Exempted and Generally Licensed Items Containing By-Product Material", U. S. Nuclear Regulatory Commission Guide 6.6, dated June 1974.

17. DECON-1, State of California for Decontaminating Facilities and Equipment Prior to Release for Unrestricted Use, dated June 1977.

18. MIL-STD-414, Sampling Procedures and Tables for Inspection by Variables for Percent Defective, June 11, 1957.

19. NUREG-1575 (EPA 402-R-97-016), "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)", December 1997.

Appendix A

Input Parameters for RESRAD Calculations (Sheet 1 of 3)

Parameter	Value Used for Scenario			RESRAD
	Industrial	Wilderness	Residential	Default
Area of contaminated zone (m^2)	1.000E+04	1.000E+04	1.000E+04	1.000E+04
Thickness of contaminated zone (m)	1.000E+00	2.000E+00	1.000E+00	2.000E+00
Length parallel to aquifer flow (m)	1.000E+02	1.000E+02	1.000E+02	1.000E+02
Basic radiation dose limit (mrem/yr)	1.500E+01	1.500E+01	1.500E+01	3.000E+01
Time since placement of material (yr)	0.000E+00	0.000E+00	0.000E+00	0.000E+00
Times for calculations (yr)	1.000E+00	1.000E+00	1.000E+00	1.000E+00
Times for calculations (yr)	3.000E+00	3.000E+00	3.000E+00	3.000E+00
Times for calculations (yr)	1.000E+01	1.000E+01	1.000E+01	1.000E+01
Times for calculations (yr)	3.000E+01	3.000E+01	3.000E+01	3.000E+01
Times for calculations (yr)	1.000E+02	1.000E+02	1.000E+02	1.000E+02
Times for calculations (yr)	3.000E+02	3.000E+02	3.000E+02	3.000E+02
Times for calculations (yr)	1.000E+03	1.000E+03	1.000E+03	1.000E+03
Times for calculations (yr)	3.000E+03	0.000E+00	3.000E+03	0.000E+00
Times for calculations (yr)	1.000E+04	0.000E+00	1.000E+04	0.000E+00
Cover depth (m)	0.000E+00	0.000E+00	0.000E+00	0.000E+00
Density of cover material (g/cm^3)	not used	not used	not used	1.500E+00
Cover depth erosion rate (m/yr)	not used	not used	not used	1.000E-03
Density of contaminated zone (g/cm^3)	1.500E+00	1.500E+00	1.500E+00	1.500E+00
Contaminated zone erosion rate (m/yr)	1.000E-03	1.000E-03	1.000E-03	1.000E-03
Contaminated zone total porosity	4.300E-01	4.300E-01	4.300E-01	4.000E-01
Contaminated zone effective porosity	2.000E-01	2.000E-01	2.000E-01	2.000E-01
Contaminated zone hydraulic conductivity (m/yr)	3.000E+03	3.000E+03	3.000E+03	1.000E+01
Contaminated zone b parameter	5.300E+00	5.300E+00	5.300E+00	5.300E+00
Humidity in air (g/cm^3)	8.000E+00	8.000E+00	8.000E+00	8.000E+00
Evapotranspiration coefficient	5.000E-01	5.000E-01	5.000E-01	5.000E-01
Precipitation (m/yr)	4.700E-01	4.700E-01	4.700E-01	1.000E+00
Irrigation (m/yr)	2.000E-01	2.000E-01	2.000E-01	2.000E-01
Irrigation mode	overhead	overhead	overhead	overhead
Runoff coefficient	2.000E-01	2.000E-01	2.000E-01	2.000E-01
Watershed area for nearby stream or pond (m^2)	1.000E+06	1.000E+06	1.000E+06	1.000E+06
Accuracy for water/soil computations	1.000E-03	1.000E-03	1.000E-03	1.000E-03
Density of saturated zone (g/cm^3)	1.500E+00	1.500E+00	1.500E+00	1.500E+00
Saturated zone total porosity	4.300E-01	4.300E-01	4.300E-01	4.000E-01
Saturated zone effective porosity	2.000E-01	2.000E-01	2.000E-01	2.000E-01
Saturated zone hydraulic conductivity (m/yr)	3.000E+03	3.000E+03	3.000E+03	1.000E+02
Saturated zone hydraulic gradient	2.000E-02	2.000E-02	2.000E-02	2.000E-02
Saturated zone b parameter	5.300E+00	5.300E+00	5.300E+00	5.300E+00
Water table drop rate (m/yr)	1.000E-03	1.000E-03	1.000E-03	1.000E-03
Well pump intake depth (m below water table)	1.000E+01	1.000E+01	1.000E+01	1.000E+01

Input Parameters for RESRAD Calculations (Sheet 2 of 3)

Parameter	Value Used for Scenario			RESRAD Default
	Industrial	Wilderness	Residential	
Model: Nondispersion (ND) or Mass-Balance (MB)	ND	ND	ND	ND
Well pumping rate (m^3/yr)	not used	not used	7.000E+01	2.500E+02
Number of unsaturated zone strata	1	1	1	1
Unsat. zone 1, thickness (m)	4.000E+00	4.000E+00	4.000E+00	4.000E+00
Unsat. zone 1, soil density (g/cm^3)	1.500E+00	1.500E+00	1.500E+00	1.500E+00
Unsat. zone 1, total porosity	4.300E-01	4.300E-01	4.300E-01	4.000E-01
Unsat. zone 1, effective porosity	2.000E-01	2.000E-01	2.000E-01	2.000E-01
Unsat. zone 1, soil-specific b parameter	5.300E+00	5.300E+00	5.300E+00	5.300E+00
Unsat. zone 1, hydraulic conductivity (m/yr)	3.000E+03	3.000E+03	3.000E+03	1.000E+01
Inhalation rate (m^3/yr)	8.400E+03	8.400E+03	8.400E+03	8.400E+03
Mass loading for inhalation (g/m^3)	2.000E-04	2.000E-04	2.000E-04	2.000E-04
Dilution length for airborne dust, inhalation (m)	3.000E+00	3.000E+00	3.000E+00	3.000E+00
Exposure duration	3.000E+01	3.000E+01	3.000E+01	3.000E+01
Shielding factor, inhalation	4.000E-01	4.000E-01	4.000E-01	4.000E-01
Shielding factor, external gamma	2.500E-01	7.000E-01	5.100E-01	7.000E-01
Fraction of time spent indoors	2.000E-01	0.000E+00	5.000E-01	5.000E-01
Fraction of time spent outdoors (on site)	4.000E-02	1.000E-01	2.500E-01	2.500E-01
Shape factor flag, external gamma	1.000E+00	1.000E+00	1.000E+00	1.000E+00
Fruits, vegetables and grain consumption (kg/yr)	1.600E+00	1.600E+00	1.600E+01	1.600E+02
Leafy vegetable consumption (kg/yr)	0.000E+00	0.000E+00	1.400E+00	1.400E+01
Milk consumption (L/yr)	not used	not used	not used	9.200E+01
Meat and poultry consumption (kg/yr)	not used	not used	not used	6.300E+01
Fish consumption (kg/yr)	not used	not used	not used	5.400E+00
Other seafood consumption (kg/yr)	not used	not used	not used	9.000E-01
Soil ingestion rate (g/yr)	3.650E+01	3.650E+01	3.650E+01	3.650E+01
Drinking water intake (L/yr)	not used	not used	5.100E+02	5.100E+02
Contamination fraction of drinking water	not used	not used	1.000E+00	1.000E+00
Contamination fraction of household water	1.000E+00	0.000E+00	1.000E+00	1.000E+00
Contamination fraction of livestock water	not used	0.000E+00	not used	1.000E+00
Contamination fraction of irrigation water	1.000E+00	1.000E+00	1.000E+00	1.000E+00
Contamination fraction of aquatic food	not used	not used	not used	5.000E-01
Contamination fraction of plant food	-1	-1	-1	-1
Contamination fraction of meat	not used	not used	not used	-1
Contamination fraction of milk	not used	not used	not used	-1
Livestock fodder intake for meat (kg/day)	not used	not used	not used	6.800E+01
Livestock fodder intake for milk (kg/day)	not used	not used	not used	5.500E+01
Livestock water intake for meat (L/day)	not used	not used	not used	5.000E+01
Livestock water intake for milk (L/day)	not used	not used	not used	1.600E+02
Livestock soil intake (kg/day)	not used	not used	not used	5.000E-01
Mass loading for foliar deposition (g/m^3)	1.000E-04	1.000E-04	1.000E-04	1.000E-04
Depth of soil mixing layer (m)	1.500E-01	1.500E-01	1.500E-01	1.500E-01
Depth of roots (m)	9.000E-01	9.000E-01	9.000E-01	9.000E-01

Input Parameters for RESRAD Calculations (Sheet 3 of 3)

Parameter	Value Used for Scenario			RESRAD
	Industrial	Wilderness	Residential	Default
Drinking water fraction from ground water	1.000E+00	1.000E+00	1.000E+00	1.000E+00
Household water fraction from ground water	not used	not used	1.000E+00	1.000E+00
Livestock water fraction from ground water	1.000E+00	1.000E+00	1.000E+00	1.000E+00
Irrigation fraction from ground water	not used	not used	not used	1.000E+00
C-12 concentration in water (g/cm^3)	not used	not used	not used	2.000E-05
C-12 concentration in contaminated soil (g/g)	not used	not used	not used	3.000E-02
Fraction of vegetation carbon from soil	not used	not used	not used	2.000E-02
Fraction of vegetation carbon from air	not used	not used	not used	9.800E-01
C-14 evasion layer thickness in soil (m)	not used	not used	not used	3.000E-01
C-14 evasion flux rate from soil (1/sec)	not used	not used	not used	7.000E-07
C-12 evasion flux rate from soil (1/sec)	not used	not used	not used	1.000E-10
Fraction of grain in beef cattle feed	not used	not used	not used	8.000E-01
Fraction of grain in milk cow feed	not used	not used	not used	2.000E-01
Storage times of contaminated foodstuffs (days):				
Fruits, non-leafy vegetables, and grain	1.400E+01	1.400E+01	1.400E+01	1.400E+01
Leafy vegetables	1.000E+00	1.000E+00	1.000E+00	1.000E+00
Milk	not used	not used	not used	1.000E+00
Meat and poultry	not used	not used	not used	2.000E+01
Fish	not used	not used	not used	7.000E+00
Crustacea and mollusks	not used	not used	not used	7.000E+00
Well water	1.000E+00	1.000E+00	1.000E+00	1.000E+00
Surface water	1.000E+00	1.000E+00	1.000E+00	1.000E+00
Livestock fodder	not used	not used	not used	4.500E+01
Thickness of building foundation (m)	1.000E-01	not used	1.000E-01	1.500E-01
Bulk density of building foundation (g/cm)	2.400E+00	not used	2.400E+00	2.400E+00
Total porosity of the cover material	not used	not used	not used	4.000E-01
Total porosity of the building foundation	1.000E-01	not used	1.000E-01	1.000E-01
Volumetric water content of the cover material	not used	not used	not used	5.000E-02
Volumetric water content of the foundation	3.000E-02	not used	3.000E-02	3.000E-02
Diffusion coefficient for radon gas (m/sec):				
in cover material	not used	not used	not used	2.000E-06
in foundation material	3.000E-07	not used	3.000E-07	3.000E-07
in contaminated zone soil	2.000E-06	not used	2.000E-06	2.000E-06
Radon vertical dimension of mixing (m)	2.000E+00	not used	2.000E+00	2.000E+00
Average annual wind speed (m/sec)	2.000E+00	not used	2.000E+00	2.000E+00
Average building air exchange rate (1/hr)	5.000E-01	not used	5.000E-01	5.000E-01
Height of the building (room) (m)	2.500E+00	not used	2.500E+00	2.500E+00
Building interior area factor	0.000E+00	not used	0.000E+00	0.000E+00
Building depth below ground surface (m)	1.000E-01	not used	1.000E-01	-1.000E+00
Emanating power of Rn-222 gas	2.500E-01	not used	2.500E-01	2.500E-01
Emanating power of Rn-220 gas	not used	not used	not used	1.500E-01

Appendix B
Agency Approvals

1. Letter from Gerard Wong (DHS) to Majelle Lee (Rocketdyne), "Authorized Sitewide Radiological Guidelines for Release for Unrestricted Use", 96ETEC-DRF-0455, August 9, 1996.
2. Memorandum from Sally A. Robison (DOE-ER) to Roger Liddle (DOE-OAK), Sitewide Limits for Release of Facilities Without Radiological Restriction", 007857RC, September 17, 1996.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

PETE WILSON, Governor

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
P.O. BOX 942732
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96ETEC-DRF-0455

August 9, 1996

Ms. Majelle Lee, Program Manager
Environmental Management
Rocketdyne Division
Rockwell International Corporation
P. O. Box 7930
Canoga Park, CA 91309-7930

Subject: Authorized Sitewide Radiological Guidelines for Release of Unrestricted Use

Dear Ms. Lee:

This letter is to acknowledge the receipt of your letter dated June 28, 1996 requesting concurrence of the above subject. The above mentioned letter and its attachments have been reviewed by the staff of this office. The Radiologic Health Branch (RHB) concurs that the proposed release guidelines provide adequate assurance for the release of the facilities and properties at Rocketdyne's Santa Susana Field Laboratory (SSFL) and DeSoto sites without further radiological restrictions. Your letter dated June 28, 1996 with attachments will be incorporated into Rocketdyne's California Radioactive Material License # 0015-70 upon receipt of a commitment letter signed by Mr. Phil Rutherford.

If you have any questions concerning this matter, please feel free to call Mr. Stephen Hsu of this office at (916) 322-4797.

Sincerely,

Gerard Wong, Ph.D., Chief
Radioactive Material Licensing Section
Radiologic Health Branch

United States Government

Department of Energy

memorandum

DATE: SEP 17 1996

REPLY TO ATTN OF: EM-44 (D. Williams, 903-8173)

SUBJECT: Sitewide Limits for Release of Facilities Without Radiological Restriction

SEP 1996 RECEIVED

TO: R. Liddle, Oakland Operations Office

We have reviewed Rocketdyne's proposed sitewide limits for release of facilities at the Santa Susana Field Laboratory (SSFL) without radiological restriction and are satisfied that our previous concerns and comments have been addressed.

The proposed limits are consistent with the Department of Energy (DOE) Order 5400.5 requirement for a Total Effective Dose Equivalent limit of 100 mrem/yr plus As low As Reasonably Achievable (ALARA) for future occupants, the Nuclear Regulatory Commission proposed a radiological guideline of 15 mrem/yr ALARA, and the Environmental Protection Agency proposed a guideline of 15 mrem/yr for release of properties.

Corrective actions taken by Rocketdyne for the sampling and statistical approach to final survey data validation for DOE projects are now comparable to methodologies or standard practices used at other DOE sites and the requirements of Nuclear Regulatory Commission Nuclear Regulation (NUREG)/CR-5489 (Manual for Conducting Radiological Surveys in Support of License Termination).

We also received a copy of the letter from the California Department of Health Services stating concurrence with the proposed release guidelines and the intent to incorporate these guidelines into Rocketdyne's California Radioactive Material License.

Based upon the above information, the proposed sitewide release criteria for remediation of facilities at the SSFL are hereby approved for use.

If you have any questions, please call Mr. Don Williams of my staff at 301-903-8173.

Sally A. Robison, Ph.D.
Director
Office of Northwestern Area Programs
Environmental Restoration

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