Chapter 8: Dose to the Public and Biota



CHAPTER 8

Airborne emissions from Idaho National Laboratory (INL) Site operations were used to determine potential radiological dose to members of the public using the Clean Air Act Assessment Package (CAP) 88-PC computer program. The annual dose to the maximally exposed individual in 2021, as determined using CAP88-PC, was 0.067 mrem (0.67 μ Sv), which was well below the applicable standard of 10 mrem (100 μ Sv) per year. A maximum potential dose from ingestion of game animals was also estimated using the highest radionuclide concentrations in the edible tissue of waterfowl collected at Advanced Test Reactor (ATR) ponds in 2021. The maximum potential dose to an individual who consumes waterfowl was calculated to be 0.002 mrem (0.02 μ Sv). It was determined there is no dose associated with the consumption of big game animals. Therefore, the total dose (from air emissions and ingestion of the waterfowl) to the maximally exposed individual during 2021 was estimated to be 0.069 mrem (0.69 μ Sv). This dose is also far below the public dose limit of 100 mrem (1 mSv) established by the U.S. Department of Energy (DOE) for a member of the public.

The maximum potential population dose to the approximately 353,435 people residing within an 80 km (50 mi) radius of any INL Site facility was also evaluated. The population dose was calculated using reported releases, an air dispersion model (HYSPLIT) used by the National Oceanic and Atmospheric Administration Air (NOAA) Resources Laboratory-Field Research Division, and a dose calculation model (DOSEMM). For 2021, the estimated potential population dose was 2.85 x 10^{-2} person-rem (2.85 x 10^{-4} person-Sv). This dose is approximately 0.00002 percent of that expected from exposure to natural background radiation of 136,779 person-rem (1,368 person-Sv).

The potential doses to aquatic and terrestrial biota from contaminated soil and water were evaluated using a graded approach. Initially, the potential doses were screened using maximum concentrations of radionuclides detected in soil and effluents at the INL Site. Results of the screening calculations indicate that contaminants released from INL Site activities do not have an adverse impact on plants or animal populations. In addition, maximum concentrations of radionuclides measured in waterfowl accessing INL Site ponds and in bats collected at or near INL facilities, were used to estimate internal doses to the waterfowl and bats. These calculations indicate that the potential doses to waterfowl and to bats do not exceed the DOE limits for biota.

No reportable unplanned radiological effluent or emission releases occurred from the INL Site in 2021, therefore, no doses or impacts were manifested.

8. DOSE TO THE PUBLIC AND BIOTA

U.S. Department of Energy (DOE) Order 458.1, "Radiation Protection of the Public and the Environment," contains requirements for protecting the public and the environment against undue risk from radiation associated with radiological activities conducted under the control of the DOE. In addition to requiring environmental monitoring to ensure compliance with the order, DOE O 458.1 establishes a public dose limit. DOE sites must perform dose evaluations using mathematical models that represent various environmental pathways to demonstrate compliance with the public dose limit and to assess collective (population) doses. In the interest of protection of the environment against ionizing radiation,

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DOE also developed the technical standard DOE-STD-1153-2019, *A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota* (DOE 2019). The Standard provides a graded approach for evaluating radiation doses to aquatic and terrestrial biota.

Title 40 Code of Federal Regulations (CFR) Part 61 Subpart H, "National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities," establishes federal radiation dose limits for the maximally exposed member of the public from all airborne emissions and pathways. It requires that doses to members of the public from airborne releases be calculated using U.S. Environmental Protection Agency (EPA) approved sampling procedures, computer models, or other procedures approved by EPA.

This chapter describes the estimated potential dose to members of the public and biota from operations at the Idaho National Laboratory (INL) Site, based on 2021 environmental monitoring measurements or calculated emissions.

8.1 **Possible Exposure Pathways to the Public**

Air, soil, groundwater, agricultural products, and biota are routinely sampled to document the amount of radioactivity in these media and determine if radioactive materials have been transported off the INL Site. The air pathway is the primary way people living beyond the INL Site boundary could be exposed to releases from INL Site operations shown in Figure 4-1.

Airborne radioactive materials are carried from the source and dispersed by winds. The concentrations from routine releases are too small to measure at locations around the INL Site, so atmospheric dispersion models were used to estimate the downwind concentration of air pollutants and the potential doses from these projected offsite concentrations. Conservative doses were also calculated from the ingestion of meat from wild game animals that access the INL Site. Ingestion doses were calculated from the concentrations of radionuclides measured in game animals killed by vehicles on roads at the INL Site and waterfowl harvested from INL Site wastewater ponds that had detectable levels of human-made radionuclides. External exposure to radiation in the environment—primarily from naturally-occurring radionuclides—was measured directly using thermoluminescent dosimeters and optically-stimulated luminescence dosimeters.

Water pathways were not considered major contributors to dose, because no surface water flows off the INL Site and no radionuclides associated with INL Site releases have been measured in public drinking water wells.

8.2 Dose to the Public from INL Site Air Emissions

The potential doses from INL Site air emissions were estimated using the amounts reported to be released or could potentially be released by the facilities. The 2021 INL National Emission Standards for Hazardous Air Pollutants (NESHAP) evaluation (DOE-ID 2022) reported potential radionuclide releases from 66 source locations at the INL Site. However, many of the sources resulted in doses that were insignificant, and many sources are located relatively close together, such that the sampling network response from a release would be the same for all nearby sources. Therefore, insignificant sources were not explicitly modeled, and some sources were consolidated with nearby sources. Emissions from four large operating stacks were modeled explicitly and included the Advanced Test Reactor (ATR) main stack (TRA-770), the Idaho Nuclear Technology and Engineering Center (INTEC) main stack (CPP-708), the Experimental Breeder Reactor-II main stack (MFC-764), and the Transient Reactor Test Facility (TREAT) stack. All other releases within a facility were assigned as near ground-level releases from a single location within the facility. These other releases include other non-fugitive releases from stacks, ducts and vents, and fugitive releases from ponds, soil, or other sources. Figure 8-1 shows the location of all sources modeled in the dose assessment. Releases from the TREAT stack were assumed collocated with releases from Materials and Fuels Complex (MFC). Releases from the Radiological Response Training Range-Northern Test Range were assumed collocated with releases from Specific Manufacturing Capability (SMC). Releases from the Radiological Response Training Range-Southern Test Range are typically collocated with releases from Radioactive Waste Management Complex (RWMC), but Radiological Response Training Range-Southern Test Range did not operate in 2021. Emissions from the Safety and Tritium Applied Research facility (TRA-666) at the ATR Complex are typically routed to and out the Material Test Reactor (MTR) stack. During calendar year 2021, TRA-666 began a building ventilation system modification project and emissions were routed to a much shorter temporary stack for most of the year. Therefore, all TRA-666 emissions for calendar year 2021 were conservatively reported as a ground-level release and no emissions were reported for the MTR stack.



The radionuclides and source terms used in the dose calculations were presented previously in Table 4-2 and are summarized in Table 8-1. The category of noble gases comprised the largest emission quantity, but only contributed slightly to the dose. Radionuclides that were categorized as noble gases tend to have short half-lives and are not typically incorporated into the food supply. Radionuclides that contributed most to the overall estimated dose to the maximally exposed individual (MEI) were cesium-137 (¹³⁷Cs), uranium-238 (²³⁸U), uranium-234 (²³⁴U), zinc-65 (⁶⁵Zn), and chlorine-36 (³⁶CI). These radionuclides are a very small fraction of the total amount of radionuclides reported.

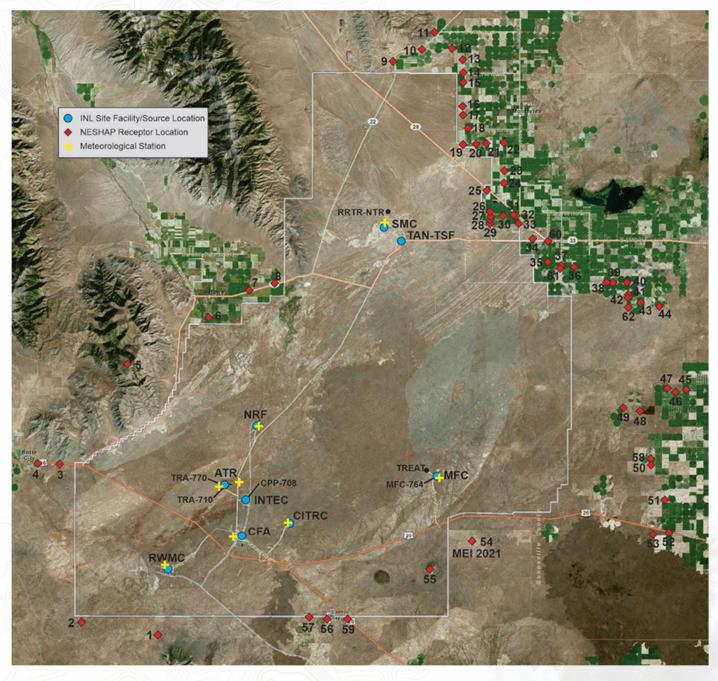


Figure 8-1. INL Site major facility airborne source locations. TRA-770, CPP-708, TREAT, and MFC-764 were modeled as stack releases. The remaining sources were modeled as ground-level releases. Releases from Radiological Response Training Range–Northern Test Range were assumed collocated with releases from SMC. Releases from TREAT were assumed collocated with releases from MFC. Sixty-two specific receptor locations, including the MEI (location 54), modeled by CAP88-PC are also shown.



Table 8-1. Summary of	of radionuclide com	position of INL	Site airborne effluents	; (2021).
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					TOTAL (CURIES ^a RELEAS	SED				
FACILITY	TRITIUM	NOBLE GASES ^c (T1/2 >40 DAYS)	NOBLE GASES ^d (T1/2 < 40 DAYS)	FISSION AND ACTIVATION PRODUCTS ^e (<i>T</i> 1/2 < 3 HOURS)	FISSION AND ACTIVATION PRODUCTS ^r (<i>T</i> 1/2 > 3 HOURS)	TOTAL RADIOIODINE*	TOTAL RADIOSTRONTIUM [®]	TOTAL URANIUM ¹	PLUTONIUM ³	OTHER ACTINIDES ^k	OTHER ¹
ATR											
Complex	4.55E+02	1.48E-19	3.72E+02	2.16E-01	1.70E-02	8.82E-05	2.65E-02	2.07E-09	8.46E-06	2.43E-05	3.12E-10
CFA	5.19E-01	6.65E-06	8.00E-02	7.98E-04	8.72E-07	3.51E-11	1.41E-11	1.27E-10	1.43E-11	2.74E-11	3.94E-15
CITRC	0.00E+00	0.00E+00	0.00E+00	2.20E-08	6.00E-12	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
INTEC	1.61E-01	1.09E+00	0.00E+00	0.00E+00	3.17E-02	7.30E-05	5.28E-05	3.15E-07	3.33E-04	3.14E-04	0.00E+00
MFC	3.65E-01	6.32E-02	1.80E+02	6.73E+00	6.52E-01	9.41E-02	1.14E-03	1.97E-01	2.71E-07	8.54E-09	0.00E+00
NRF	1.10E-02	5.30E-03	0.00E+00	0.00E+00	5.50E-01	1.72E-05	6.90E-05	0.00E+00	3.80E-06	0.00E+00	0.00E+00
RWMC	4.81E+01	0.00E+00	0.00E+00	0.00E+00	2.22E-02	0.00E+00	4.29E-08	1.43E-08	5.51E-05	1.05E-04	0.00E+00
TAN	3.26E-02	5.72E-06	1.45E-10	8.55E-11	1.06E+01	0.00E+00	1.02E-06	1.09E-07	0.00E+00	0.00E+00	0.00E+00
Total	5.04E+02	1.16E+00	5.52E+02	6.95E+00	1.19E+01	9.42E-02	2.77E-02	1.97E-01	4.01E-04	4.43E-04	3.12E-10

a. One curie (Ci) = 3.7×10^{10} becquerels (Bq).

b. ATR Complex = Advanced Test Reactor Complex; CFA = Central Facilities Area; CITRC = Critical Infrastructure Test Range Complex; INTEC = Idaho Nuclear Technology and Engineering Center; MFC = Materials and Fuels Complex; NRF = Naval Reactors Facility; RWMC = Radioactive Waste Management Complex (including Advanced Mixed Waste Treatment Project and Radiological Response Training Range-Southern Test Range); TAN = Test Area North (including Specific Manufacturing Capability and Radiological Response Training Range-Northern Test Range).

c. Noble gases ($T_{1/2} > 40$ days) released in 2021 = ³⁹Ar, ⁴²Ar, ⁸¹Kr and ⁸⁵Kr (³⁹Ar, ⁴²Ar and ⁸¹Kr release is negligible).

d. Noble gases ($T_{1/2} < 40$ days) released in 2021 = ⁴¹Ar, ⁷⁹Kr, ^{83m}Kr, ^{85m}Kr, ⁸⁷Kr, ⁸⁸Kr, ⁸⁷Kr, ⁸⁹Kr, ²¹⁹Rn, ²²⁰Rn, ¹²⁷Xe, ^{131m}Xe, ¹³⁵Xe, ¹³⁵Xe, ^{135m}Xe, ¹³⁵Xe, ^{135m}Xe, ^{135m}Xe,

e. Fission products and activation products ($T_{1/2} < 3$ hours) released in 2021 = 106 Ag, 109m Ag, 110 Ag, 78 As, 137m Ba, 139 Ba, 141 Ba, 211 Bi, 80 Br, 83 Br, 84 Br, 117 Cd, 60m Co, 138 Cs, 139 Cs, 140 Cs, 165 Dy, 158 Eu, 68 Ga, 75 Ge, 78 Ge, 114 In, 117 In, 142 La, 56 Mn, 97 Nb, 149 Nd, 65 Ni, 150 Pm, 144 Pr, 88 Bb, 90 Rb, 103m Rh, 106m Rh, 126m Sb, 130 Sb, 81 Se, 127 Sn, 128 Sn, 129 Te, 131 Te, 134 Te, 208 Tl, 89m Y, 91m Y and 69 Zn.

- f. Fission products and activation products (*T*₁₂> 3 hours) released in 2021 = ^{108m}Ag, ^{111m}Ag, ¹¹²Ag, ⁷³As, ⁷⁶As, ⁷⁷As, ¹³³Ba, ¹⁴⁰Ba, ¹⁰Be, ²⁰⁷Bi, ²¹⁰Bi, ^{210m}Bi, ⁸²Br, ¹⁴C, ⁴⁵Ca, ¹⁰⁹Cd, ^{113m}Cd, ¹¹⁵Cd, ^{113m}Cd, ¹¹⁵Ce, ¹⁴¹Ce, ¹⁴³Ce, ¹⁴⁴Ce, ³⁶Cl, ⁵⁷Co, ⁵⁸Co, ⁶⁰Co, ⁵¹Cr, ¹³⁴Cs, ¹³⁵Cs, ¹³⁵Cs, ¹³⁵Cs, ¹³⁷Cs, ⁶⁴Cu, ⁶⁷Cu, ¹⁵⁹Dy, ¹⁶⁶Dy, ¹⁶⁹Br, ¹⁵²Eu, ¹⁵⁴Eu, ¹⁵⁵Eu, ¹⁵⁵Eu, ⁵⁵Fe, ⁵⁹Fe, ⁶⁰Fe, ⁷²Ga, ⁷³Ga, ¹⁵³Gd, ¹⁵⁹Gd, ⁶⁸Ge, ⁷¹Ge, ¹⁷⁵Hf, ^{175m}Hf, ^{179m}Hf, ¹⁸¹Hf, ¹⁸²Hf, ²⁰³Hg, ^{166m}Ho, ^{114m}In, ^{115m}In, ¹⁹²Ir, ¹⁹⁴Ir, ⁴⁰K, ⁴²K, ¹⁴⁰La, ¹⁴¹La, ⁵²Mn, ⁵³Mn, ⁵⁴Mn, ⁹³Mo, ⁹⁹Mo, ²²Na, ²⁴Na, ^{92m}Nb, ^{93m}Nb, ⁹⁴Nb, ⁹⁵Nb, ^{95m}Nb, ⁹⁶Nb, ¹⁴⁷Nd, ⁵⁷Ni, ⁵⁹Ni, ⁶³Ni, ⁶⁶Ni, ¹⁸⁵Os, ¹⁹¹Os, ³²P, ³³P, ²⁰⁵Pb, ²¹⁰Pb, ¹⁰⁷Pd, ¹⁰⁹Pd, ¹⁴⁶Pm, ¹⁴⁷Pm, ¹⁴⁸Pm, ¹⁴⁸Pm, ¹⁴⁹Pm, ¹⁵¹Pm, ²¹⁰Po, ¹⁴³Pr, ¹⁴⁵Pr, ⁸³Rb, ⁸⁴Rb, ⁸⁶Rb, ⁸⁷Rb, ¹⁸⁴Re, ^{184m}Re, ¹⁸⁶Re, ¹⁸⁶Re, ¹⁸⁶Re, ¹⁸⁷Re, ¹⁸⁸Re, ¹⁰²Rh, ¹⁰²Rh, ¹⁰²Rh, ¹⁰³Ru, ¹⁰⁵Ru, ¹⁰⁵Sh, ¹²²Sb, ¹²²Sb, ¹²⁵Sb, ¹²⁶Sb, ¹²⁷Sb, ¹²⁸Sb, ¹²⁹Sb, ⁴⁶Sc, ⁴⁷Sc, ⁴⁸Sc, ⁷⁹Se, ³²Si, ¹⁵¹Sm, ¹⁵³Sm, ¹⁵⁵Sm, ¹¹³Sn, ^{117m}Sn, ^{119m}Sn, ¹²¹Sn, ¹²³Sn, ¹²⁵Sn, ¹²⁶Sn, ¹⁷⁹Ta, ¹⁸²Ta, ¹⁸³Ta, ¹⁵⁷Tb, ¹⁵⁸Tb, ¹⁶⁰Tb, ¹⁶¹Tb, ^{97m}Tc, ⁹⁹Tc, ^{99m}Tc, ^{123m}Te, ^{127m}Te, ^{127m}Te,
- g. Radioiodine released in $2021 = {}^{125}I$, ${}^{126}I$, ${}^{128}I$, ${}^{129}I$, ${}^{130}I$, ${}^{131}I$, ${}^{132}I$, ${}^{133}I$, ${}^{134}I$ and ${}^{135}I$.
- h. Radiostrontium released in $2021 = {}^{80}$ Sr, 85 Sr, 89 Sr, 90 Sr, 91 Sr and 92 Sr.
- i. Uranium isotopes released in 2021 = ²³²U, ²³³U, ²³⁴U, ²³⁵U, ²³⁶U, ²³⁷U and ²³⁸U.
- j. Plutonium isotopes released in $2021 = {}^{236}Pu$, ${}^{238}Pu$, ${}^{239}Pu$, ${}^{240}Pu$, ${}^{241}Pu$, ${}^{242}Pu$ and ${}^{244}Pu$.
- k. Other actinides released in 2021 = 227Ac, 2^{41} Am, 2^{42} Cm, 2^{42} Cm, 2^{42} Cm, 2^{243} Cm, 2^{243} Cm, 2^{23} Np, 2^{32} Pa, 2^{32} Pa, 2^{32} Pa, 2^{23} Ph, 2^{22} Th, 2^{22} Th, 2^{23} Th, 2^{32} Th and 2^{34} Th.
- 1. Other = radioisotopes of elements that are not noble gases, activation or fission products, radioidine, radiostrontium, or actinides released in 2021. These are typically heavy elements that are decay chain members of actinides. They include ²¹²Bi, ²¹⁴Bi, ²¹¹Pb, ²¹²Pb, ²¹²Pb, ²¹²Po, ²¹⁵Po, ²¹⁵Po, ²¹⁶Po, ²²³Ra, ²²⁴Ra, ²²⁶Ra and ²⁰⁷Tl.



The following two kinds of dose estimates were made using the release data:

- The effective dose to the hypothetical MEI, as defined by the NESHAP regulations. The Clean Air Act Assessment Package-1988 personal computer (CAP88-PC) model Version 4.1 (EPA 2020) was used to predict the maximum concentration and dose at offsite receptor locations. The receptor location with the highest estimated dose is the MEI location.
- The collective effective dose (population dose) for the population within 80 km (50 mi) of any INL Site facility. For this calculation, the HYbrid Single-Particle Lagrangian Integrated Trajectory (HYSPLIT) model (Stein et al. 2015) was used to model atmospheric transport, dispersion, and deposition of radionuclides released to the air from the INL Site. The population dose was estimated using the Dose Multi-Media (DOSEMM) model (Rood 2019) using dispersion and deposition factors calculated by HYSPLIT in order to comply with DOE O 458.1.

The dose estimates considered air immersion dose from gamma-emitting radionuclides, internal dose from inhalation of airborne radionuclides, internal dose from ingestion of radionuclides in plants and animals, and external dose from gamma-emitting radionuclides deposited on soil previously shown in Figure 4-1. The CAP88-PC computer model uses dose and risk tables developed by the EPA. Population dose calculations were made using: (1) DOE effective dose coefficients for inhaled radionuclides (DOE 2011); (2) EPA dose conversion factors for ingested radionuclides (EPA 2002); and (3) EPA dose conversion factors for external exposure to radionuclides in the air and deposited on the ground surface (EPA 2002).

8.2.1 Maximally Exposed Individual Dose

The EPA NESHAP regulation requires demonstrating that radionuclides other than radon released to air from any DOE nuclear facility do not result in a dose to the public of greater than 10 mrem/yr (0.1 mSv/yr) (40 CFR 61, Subpart H). EPA requires the use of an approved computer model such as CAP88-PC to demonstrate compliance with 40 CFR 61, Subpart H. CAP88-PC uses a modified Gaussian plume model to estimate the average dispersion of radionuclides released from up to six sources. It uses average annual wind files based on data collected at multiple locations on the INL Site by the National Oceanic and Atmospheric Administration (NOAA).

The dose to the MEI from INL Site airborne releases of radionuclides was calculated to demonstrate compliance with NESHAP and is published in the *National Emissions Standards for Hazardous Air Pollutants – Calendar Year 2021 INL Report for Radionuclides* (DOE-ID 2022). In order to identify the MEI, the doses at 62 offsite locations shown in Figure 8-1, were calculated and then screened for the maximum potential dose to an individual who might live at one of these locations. The highest potential dose location was determined to be location 54, a farmhouse and cattle operation located 3.1 km south of Highway 20, 3 km from INL Site's east entrance. This is the same MEI location as the previous year, but different from the MEI location for several years prior to that which was location 1 (a.k.a. Frenchmans Cabin), located 2.3 km south of the INL boundary, south of RWMC. Although the dose in 2021 was slightly higher at location 55 (e.g., East Butte) than at location 54, location 55 does not currently qualify as a NESHAP receptor location. Privately owned communication (e.g., TV, radio, cell) towers are located on top of East Butte, but there are currently no dwellings or places of business, and this site is visited only occasionally by maintenance workers. Nevertheless, doses are calculated at this point should the occupancy situation change. An effective annual dose of 0.067 mrem (0.67 µSv) was calculated for a hypothetical person living at location 54 during 2021. The 2021 dose at the former MEI (location 1) was 0.015 mrem/yr and it was the 29th highest receptor location in terms of dose.

Figure 8-2 compares the MEI doses calculated for years 2012–2021. All the doses are well below the whole-body dose limit of 10 mrem/yr (0.1 mSv/yr) for airborne releases of radionuclides established by 40 CFR 61, Subpart H. The highest dose estimated during the past ten years was in 2021.

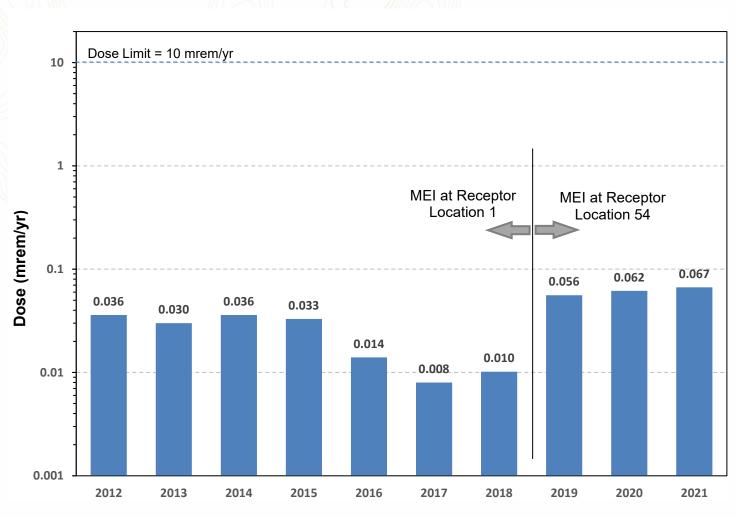


Figure 8-2. MEI dose from INL Site airborne releases estimated for 2012–2021. See Figure 8-1 for INL Site receptor locations.

Although noble gases were the radionuclides released in the largest quantities in 2021, they accounted for less than 1% of the cumulative MEI dose from all pathways largely because of their relatively short half-lives and because they only affect the immersion dose (i.e., they are excluded from the food supply). For example, about 40% of the total INL activity released was argon-41 (⁴¹Ar) as shown in Table 4-2, yet ⁴¹Ar accounted for less than 1% of the estimated MEI dose. In contrast, radionuclides typically associated with airborne particulates, such as ¹³⁷Cs, ²³⁸U, ²³⁴U, ⁶⁵Zn and ³⁶Cl, comprised only a small fraction (e.g., less than 0.08%) of the total amount of radionuclides reported to be released previously reported in Table 4-2, yet resulted in approximately 92.36% of the estimated MEI dose are shown in Figure 8-3. The dose from ¹³⁷Cs (e.g., half-life 30.2 years) comes largely from deposition on the ground where it can enter the food chain and is a source of direct radiation. The direct radiation comes from gamma photons emitted from the short-lived decay product barium-137m. Uranium-234 and ²³⁸U are isotopes of natural uranium with half-lives of 245,500 years and 4.5 billion years, respectively. During decay, both isotopes emit alpha particles which are less penetrating than other forms of radiation, and ²³⁸U emits a weak gamma ray. As long as it remains outside the body, uranium poses a small health hazard, mostly from gamma-rays. If inhaled or ingested, the radioactivity poses increased risks of cancer due to alpha particle emissions. Chlorine-36 also has a very long half-life that decays by emitting a relatively low-energy beta particle and a small amount of gamma radiation that poses a hazard only if ingested. Zinc-65 is the longest-lived zinc radioisotope with a half-life of 244 days. Zinc-65 causes direct radiation dose and dose from inhalation and ingestion.



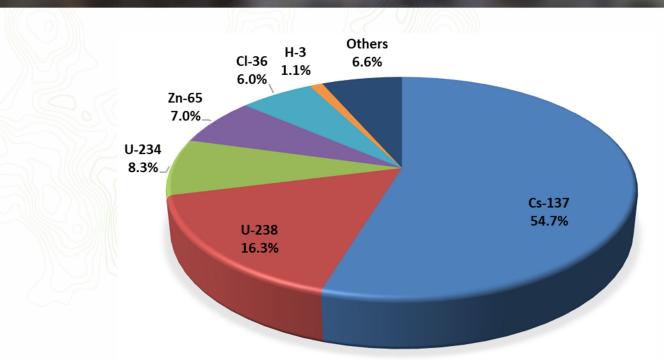


Figure 8-3. Radionuclides contributing to dose to MEI from INL Site airborne effluents as calculated using the CAP88-PC Model (2021).

Primary sources of the major radionuclides used to estimate the dose to the MEI are identified in Figure 8-3 were identified during preparation of the annual NESHAP report (DOE-ID 2021) as follows:

- The largest dose contribution was from ¹³⁷Cs (54.7%) and the majority came from the Radiochemistry Laboratory (MFC-1702) located at MFC.
- ²³⁸U and ²³⁴U account for 16.3% and 8.3% of the MEI dose respectively; most came from the Advanced Fuel Facility (MFC-784) at MFC.
- ⁶⁵Zn and ³⁶Cl account for 7.0% and 6.0% of the MEl dose respectively; the majority came from the Electron Microscopy Laboratory (MFC-774) at MFC.
- Tritium accounts for only 1.1% of the MEI dose with 21.1% coming from the ATR Complex warm waste ponds (TRA-715), 50.6% coming from beryllium blocks at RWMC, 17.3% from the ATR stack, and the rest from other sources.

The largest contribution by facility to the MEI dose came overwhelmingly from MFC at 97.1%, followed by the ATR Complex at 1.45%, and RWMC at 0.64% as shown in Figure 8-4. This is expected for location 54 given the proximity to MFC. Additionally, primary wind directions at the INL Site are from the southwest and northeast and thus emissions from Test Area North, the Naval Reactors Facility, INTEC, ATR, and RWMC are off axis from a receptor near MFC.

Although the dose increased slightly in 2021, the MEI dose of 0.067 mrem/year is still far below the regulatory standard of 10 mrem/yr (0.1 mSv/yr) (40 CFR 61, Subpart H).



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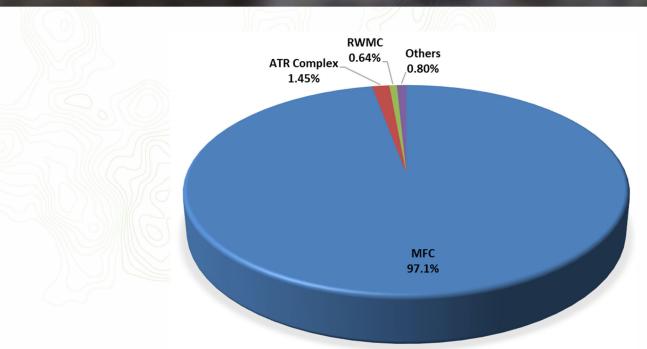


Figure 8-4. Percent contributions, by facility, to MEI dose from the INL Site airborne effluents as calculated using the CAP88-PC Model (2021).

8.2.2 Eighty Kilometer (50 Mile) Population Dose

The total effective population dose from airborne releases was calculated using air dispersion modeling performed by the NOAA Air Research Laboratory Field Research Division using their HYSPLIT model (Stein et al. 2015; Draxler et al. 2013), and the DOSEMM v 190926 (Rood 2019) dose assessment model. The HYSPLIT model and its capabilities are described on the NOAA Air Resources Laboratory website (see https://www.arl.noaa.gov/hysplit/).

The objective of these calculations were to provide a grid of total effective dose across a model domain that encompasses an 80-km (50-mi) radius from any INL Site source, as observed in Figure 8-5. In addition to INL Site sources, releases from the Idaho Falls facilities located at the INL Research Center (IRC) within Idaho Falls city limits were also included. These data were then used with geographical information system software to compute population dose.

The radionuclide source term for facilities that contributed significantly to the annual dose were the same as those used by the CAP88-PC (EPA 2020) modeling performed for the annual NESHAP report (DOE-ID 2022). These sources and radionuclides were included in the HYSPLIT/DOSEMM modeling. Radionuclides and facilities that yielded greater than 0.01% of the total dose at the location of the INL Site MEI were selected to be modeled, as observed in Tables 8-2 and 8-3, respectively. For Idaho Falls facilities, radionuclides that result in a dose greater than 0.1% of the total dose at the MEI in Idaho Falls were included. The radionuclide source term used for the Idaho Falls facilities modeling is shown in Table 8-4.

During 2021, the NOAA Air Resources Laboratory Field Research Division continuously gathered meteorological data at 34 meteorological stations on and around the INL Site (see *Meteorological Monitoring*, a supplement to this Annual Site Environmental Report). The transport and dispersion of contaminants by winds and deposition onto the ground was projected by the HYSPLIT model using hourly averaged observations from the meteorological stations throughout 2021 together with regional topography. The model predicted dispersion and deposition resulting from releases from each facility at each of 17,877 grid points projected on and around the INL Site. The Cartesian grid was designed to encompass the region within 80 km (50 mi) of INL Site facilities, as shown in Figure 8-5. In addition, 27 boundary receptor locations, representing actual residences around the INL Site, were included in the modeling. These 27 receptor locations are a subset of the 62 receptor locations used for the NESHAP evaluation.

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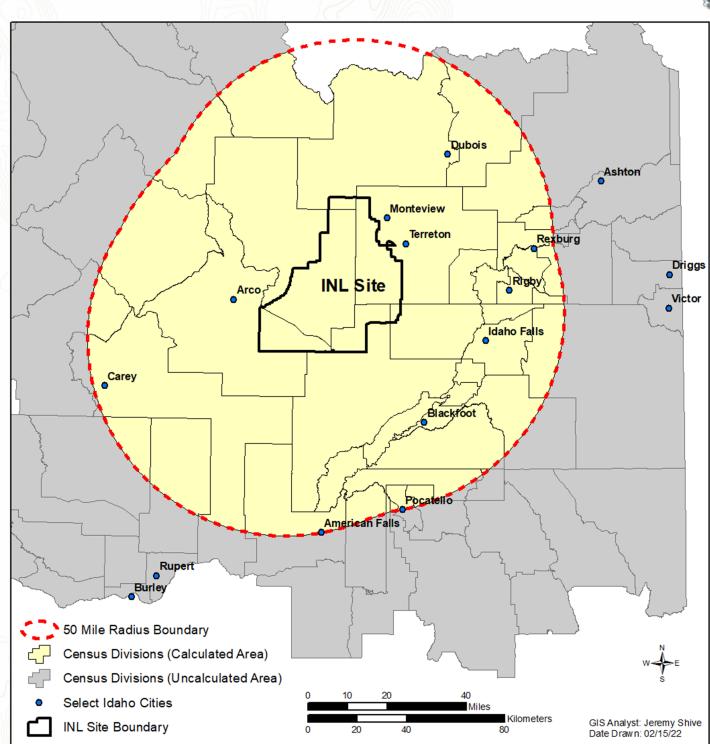


Figure 8-5. Region within 80 km (50 miles) of INL Site facilities. Census divisions used in the 50-mile population dose calculation are shown.

Table 8-2. Particulate radionuclide source term (Ci yr ¹) for radionuclide-facility combinations that contributed greater than 0.01% of the total dose for INL Site

RADIONCULIDE	ATRC	ATRC- ATR	ATRC- MTR	CFA	INTEC	INTEC- MS	MFC	MFC-MS	MFC- TREAT	NRF	RWMC	SMC	TAN	TOTAL (Ci yr ⁻¹)
Americium-241	2.19E-05	5.79E-07	-	7.50E-12	3.14E-04	2.66E-13	2.77E-11	-	_	-	1.05E-04	-	-	4.41E-04
Bromine-82	-	-	-	8.29E-07	_	-	-	-	-	-	-	1.03E+01	-	1.03E+01
Chlorine-36	-	6-1		_	5.02E-06	_	7.19E-03	-	_	-	_	2.71E-09	-	7.19E-03
Cobalt-60	7.07E-03	4.93E-06	_	2.11E-11	1.64E-05	_	1.97E-12	_	_		4.43E-17	_	_	7.09E-03
Cesium-137	5.48E-03	4.38E-05	_	3.75E-08	2.17E-04	5.99E-10	2.60E-01	-	_	6.30E-05	4.43E-18	-	-	2.66E-01
Plutonium-239	8.46E-06	_	_	1.28E-11	1.16E-04	9.81E-14	2.29E-07	1.74E-08	8.20E-09	3.80E-06	4.14E-05	_	_	1.70E-04
Plutonium-240	1.28E-14	-	_	1.25E-12	1.15E-04	8.83E-14	3.58E-11	-	_	-	1.13E-05	-	-	1.26E-04
Strontium-90	2.65E-02	_	-	2.10E-12	5.28E-05	5.49E-10	2.23E-06	9.05E-08	_	6.90E-05	4.29E-08	_	1.02E-06	2.66E-02
Tellurium-129m	-	-	_	7.17E-14	_	_	4.32E-02	-	_	-	_	-	-	4.32E-02
Uranium-234	1.41E-10	_	-	6.57E-12	1.76E-07	_	6.52E-02	_	_	-	_	1.65E-08	_	6.52E-02
Uranium-235	3.09E-10	-	-	2.41E-13	1.02E-08	_	2.19E-02	_	_	-	2.48E-10	1.15E-09	-	2.19E-02
Uranium-238	1.57E-09	_	_	3.57E-13	1.29E-07	_	1.10E-01	_	_	_	1.40E-08	9.16E-08	_	1.10E-01
Zinc-65	9.52E-06	-	_	9.45E-14	6.53E-17	_	3.32E-01	_	_	-	_	4.27E-08	_	3.32E-01

ATRC = Advanced Test Reactor Complex; ATRC-ATR = Advanced Test Reactor Complex-Advanced Test Reactor; ATRC-MTR = Advanced Test Reactor; CFA = Central Facilities Area; INTEC = Idaho Nuclear Technology and Engineering Center, INTEC-MS = Idaho Nuclear Technology and Engineering Center-Main Stack; MFC = Materials and Fuels Complex; MFC-MS = Materials and Fuels Complex-Main Stack; MFC-TREAT = Materials and Fuels Complex-Transient Reactor Test Facility; NRF = Naval Reactors Facility, RWMC = Radioactive Waste Management Complex (including Advanced Mixed Waste Treatment Project); SMC = Specific Manufacturing Capability; TAN = Test Area North (including Technical Support Facility).

Table 8-3. Noble gases, iodine, tritium and carbon-14 source term (Ci yr¹) for radionuclide-facility combinations that contributed greater than 0.01% of the total dose for INL Site facilities^a at the MEI location (2021).

RADIONUCLIDE	ATRC	ATRC- ATR	ATRC- MTR	CFA	INTEC	INTEC- MS	MFC	MFC- TREAT	NRF	RWMC	SMC	TAN	TOTAL (Ci yr ⁻¹)
Argon-41	5.40E-05	3.47E+02	_	4.70E-05	_	_	_	8.09E+01	_	_	8.69E-11	-	4.28E+02
Krypton-87	3.40E-05	3.11E+00	_	7.08E-05	_	_	_	1.05E+01	_	-	1.74E-20	_	1.36E+01
Krypton-88	5.21E-03	_	_	3.75E-03	_	_	_	9.51E+00	_	_	- 24	-	9.52E+00
Krypton-89	-	-	-	_	-	_	_	3.42E+01	_	_	-	-	3.42E+01
Xenon-138	1.18E-04	1.13E+01	_	5.90E-05	_	_	_	1.62E+01	_	_	2 %	- 4	2.75E+01
Iodine-129	1.31E-10	-	-	1.29E-18	6.91E-05	3.92E-06	4.91E-05	_	1.20E-05	_	-	-	1.34E-04
Iodine-131	1.75E-06	5.10E-07	_	2.51E-12	_	_	9.40E-02	_	5.20E-06	_	- 74	(- M)	9.40E-02
Carbon-14	4.32E-10	-	-	2.00E-09	3.15E-02	_	_	_	5.50E-01	2.22E-02	-	-	6.04E-01
Hydrogen-3	7.48E+01	3.80E+02	_	5.19E-01	1.59E-01	1.28E-03	3.65E-01	_	1.10E-02	4.81E+01		3.26E-02	5.04E+02

ATRC = Advanced Test Reactor Complex; ATRC-ATR = Advanced Test Reactor Complex-Advanced Test Reactor; ATRC-MTR = Advanced Test Reactor; CFA = Central Facilities Area; INTEC = Idaho Nuclear Technology and Engineering Center; INTEC-MS = Idaho Nuclear Technology and Engineering Center-Main Stack; MFC = Materials and Fuels Complex; MFC-TREAT = Materials and Fuels Complex-Transient Reactor Test Facility; NRF = Naval Reactors Facility; RWMC = Radioactive Waste Management Complex (including Advanced Mixed Waste Treatment Project); SMC = Specific Manufacturing Capability; TAN = Test Area North (including Technical Support Facility).



facilities^a at the MEI location (2021).





 Table 8-4. Radionuclide source term (Ci yr⁻¹) for radionuclides that contributed greater than 0.1% of the total

 dose for INL in-town facilities^a (2021).

RADIONUCLIDE	IF-603	IF-611	IF-683 (RESL)	ANNUAL RELEASE (Ci yr ⁻¹)
Actinium-227			5.39E-09	5.39E-09
Americium-241	-	-	1.02E-07	1.02E-07
Americium-243		-	1.04E-09	1.04E-09
Barium-133	-	-	3.59E-07	3.59E-07
Cobalt-60	2.00E-17	_	1.16E-08	1.16E-08
Cesium-134	9.37E-07	-	2.57E-08	9.63E-07
Cesium-137	9.40E-08	_	7.18E-08	1.66E-07
Europium-152	_	_	4.49E-08	4.49E-08
Europium-154	1.50E-13	-	7.69E-08	7.69E-08
Iodine-125	_	_	4.88E-08	4.88E-08
Iodine-129	_	_	1.10E-10	1.10E-10
Neptunium-237	-	-	6.48E-09	6.48E-09
Protactinium-231	_	_	1.15E-09	1.15E-09
Plutonium-238	_	_	7.83E-08	7.83E-08
Plutonium-239	-	-	1.32E-07	1.32E-07
Radium-226	-	-	7.53E-08	7.53E-08
Strontium-90	-	-	7.04E-08	7.04E-08
Uranium-232	-	-	3.18E-08	3.18E-08
Uranium-233	_	_	1.64E-07	1.64E-07
Xenon-133	_	4.63E-01	_	4.63E-01
Xenon-135	_	1.24E-04	_	1.24E-04
Zinc-65	4.70E-08	_	8.41E-08	1.31E-07

a. All three sources are located at the INL Research Center and were assumed to be released from the Radiological and Environmental Sciences Laboratory (RESL) stack location.

Outputs from the NOAA HYSPLIT model were radionuclide air concentrations and deposition amounts for a unit release (1 Ci/s) for each significant INL Site source calculated at 17,877 grid nodes across the model domain. These values were converted to dispersion and deposition factors for use in DOSEMM (Rood 2019).

The dispersion factor, often referred to as the X/Q value (concentration divided by source), was calculated by dividing the concentration in air (Ci/m³) by the unit release rate (1 Ci/s) resulting in dispersion factor units of s/m³. The deposition factor was calculated by dividing the total deposition (Ci/m²) by the release time (seconds) and then by the unit release rate (1 Ci/s) to yield deposition factors in units in $1/m^2$. Dispersion and deposition factors were calculated for each month of the year and were read into DOSEMM along with the annual radionuclide release rates from each source. Although annual release quantities were provided, monthly release quantities could have been used if available to account for seasonal variations in atmospheric dispersion.

Using DOSEMM, the actual estimated radionuclide emission rate (Ci/s) for each radionuclide and each facility was multiplied by the air dispersion and deposition factors that were calculated by HYSPLIT to yield an air concentration (Ci/m³) and deposition (Ci/m²) at each of the grid points over the time of interest (in this case, one year). The products





were then used to calculate the effective dose (mrem) via inhalation, ingestion, and external exposure pathways at each grid point and at each boundary receptor location using the methodology described in Rood (2019).

Figure 8-6 displays the summation of all doses calculated from the modeling of all releases from all facilities (including INL in-town facilities) as isopleths, ranging in value from 0.0008 to 0.8 mrem (0.008 to 8 μ Sv). The highest dose to an INL Site boundary receptor was estimated to be 0.00659 mrem (0.0659 μ Sv) at a farmhouse and cattle operation (receptor location 6, which is the same as receptor location 54 in Figure 8-1). The farmhouse and cattle operation are also the location of the MEI used for the NESHAP dose assessment in 2021, which reported an estimated dose of 0.067 mrem (0.67 μ Sv) to the MEI (see Section 8.2.1). The lower dose of the HYSPLIT/DOSEMM model are attributed to the generally lower HYSPLIT dispersion factors when compared to those from CAP88-PC and 1-year buildup time in soil in DOSEMM for external exposure compared to 100-year buildup time in CAP88-PC (Rood 2022). The HYSPLIT dispersion factors reflect differences in plume trajectory, turbulent diffusion, terrain complexities, plume depletion and sector averaging between the HYSPLIT and CAP88-PC models.

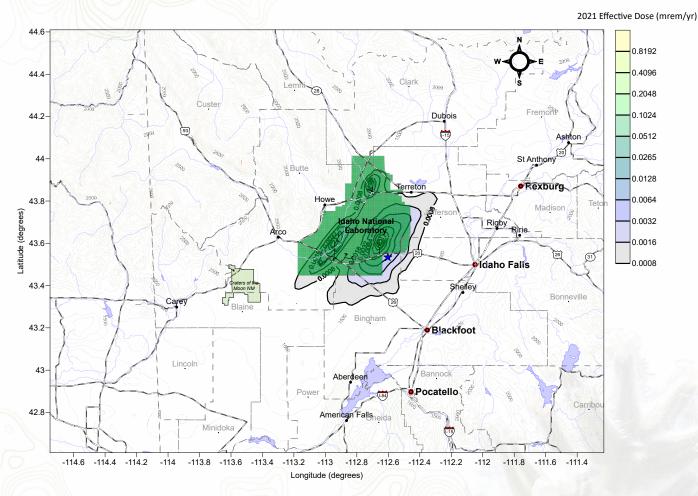


Figure 8-6. Effective dose (mrem) isopleth map with boundary receptor locations displayed (2021). The maximum receptor dose is projected at receptor 6, which is a farmhouse and cattle operation, as depicted as a blue star east of the INL east entrance. This is the same location as receptor 54 in Figure 8-1.

To calculate the 80 km (50 mi) population dose, the number of people living in each census division was first estimated with data from the 2010 census extrapolated to 2021. The extrapolation of the population for each census division was performed by calculating the change in the population during the last ten-year period between censuses (i.e., 2000-2010) and dividing the result by ten to yield the rate of change per year. The rate of change per year was adjusted for the 2021 time period and applied to the 2010 population in order to estimate the number of people living in each census division. It was necessary to use 2010 census data for 2021 because full 2020 census results were not available in time for





publication of this report. The next step involved the use of the Geographic Information System. The grid and dose values from DOSEMM were imported into the Geographic Information System. The doses within each census division were averaged and multiplied by the population within each of the divisions or portion of divisions within the 80 km (50 mi) area defined in Figure 8-5. These doses were then summed over all census divisions to obtain the 80 km (50 mi) population dose, as observed in Table 8-5. The estimated potential population dose was 2.85×10^{-2} person-rem (2.85 x 10^{-4} person-Sv) to a population of approximately 353,435. When compared with the approximate population dose of 136,779 person-rem (e.g., 1,368 person-Sv) estimated to be received from natural background radiation, as observed in Table 8-6, this represents an increase of about 0.00002 percent.

The estimated population dose for 2021 is lower than that calculated for 2020 (5.41 x 10⁻² person-rem).

CENSUS COUNTY	POPULATION ^c -	POPULATION DOSE			
DIVISION ^{a,b}	rorulation ⁻	PERSON-rem	PERSON-Sv		
Aberdeen	3,798	3.34E-04	3.34E-06		
Alridge	586	7.44E-06	7.44E-08		
American Falls	11,027	1.59E-03	1.59E-05		
Arbon (part)	30	1.03E-06	1.03E-08		
Arco	2,710	8.08E-04	8.08E-06		
Atomic City (division)	2,697	9.21E-03	9.21E-05		
Blackfoot	16,482	7.28E-04	7.28E-06		
Carey (part)	1,131	1.18E-04	1.18E-06		
East Clark	85	7.90E-06	7.90E-08		
East Madison (part)	327	8.26E-06	8.26E-08		
Firth	3,291	1.04E-04	1.04E-06		
Fort Hall (part)	4,702	1.50E-04	1.50E-06		
Hailey-Bellevue (part)	6	6.18E-08	6.18E-10		
Hamer	2,370	3.90E-03	3.90E-05		
Howe	403	3.55E-04	3.55E-06		
Idaho Falls	119,106	3.77E-03	3.77E-05		
Idaho Falls, west	1,669	7.20E-04	7.20E-06		
Inkom (part)	676	1.01E-05	1.01E-07		
Island Park (part)	102	1.04E-05	1.04E-07		
Leadore (part)	6	1.27E-07	1.27E-09		
Lewisville-Menan	4,488	3.32E-04	3.32E-06		
Mackay (part)	1,300	1.54E-05	1.54E-07		
Moreland	11,092	7.24E-04	7.24E-06		
Pocatello	67,708	1.81E-03	1.81E-05		
Rexburg	33,528	1.25E-03	1.25E-05		

Table 8-5. Dose to population within 80 km (50 miles) of INL Site facilities (2021).





CENSUS COUNTY	POPULATION ^c -	POPULATI	ON DOSE	
DIVISION ^{a,b}	FOFULATION -	PERSON-rem	PERSON-Sv	
Rigby	24,160	7.46E-04	7.46E-06	
Ririe	2,212	3.12E-05	3.12E-07	
Roberts	1,657	2.64E-04	2.64E-06	
Shelley	9,465	3.06E-04	3.06E-06	
South Bannock (part)	343	8.46E-06	8.46E-08	
St. Anthony (part)	2,777	1.72E-04	1.72E-06	
Sugar City	8,291	5.62E-04	5.62E-06	
Swan Valley (part)	7,268	1.02E-04	1.02E-06	
Ucon	7,119	2.65E-04	2.65E-06	
West Clark	823	6.09E-05	6.09E-07	
TOTAL	353,435	2.85E-02	2.85E-04	

Table 8-5. continued.

a. The U.S. Census Bureau divides the country into four census regions and nine census divisions. The bureau also divides counties (or county equivalents) into census county divisions.

b. (Part) means only a part of the county census division lies within the 80 km (50 mi) radius of a major INL Site facility.

c. Population extrapolated to estimate 2020 values based on 2010 Census Report for Idaho since the 2020 Census Report was not available at the time of this report.

T	able 8-6. Contribution to	estimated annu	al dose from INL Site fa	cilities by pathway (2021).
	ANNUAL DOSE TO MEL	DEDCENT	ESTIMATED	ESTIMATED BACKCROUND

		O MEI	PERCENT		IATED ION DOSE		BACKGROUND
PATHWAY	(mrem)	(µSv)	- OF DOE 100 mrem/yr LIMIT ^a	(PERSON- rem)	(PERSON- Sv)	POPULATION WITHIN 80 km	RADIATION POPULATION DOSE (PERSON-rem) ^b
Air	0.067	0.67	0.067	0.028	0.00028	3 <mark>53,4</mark> 35	136,779
Waterfowl	0.002	0.02	0.002	NA ^c	NA	NA	NA
Big game animals	0.000	0.00	NA	NA	NA	NA	NA
TOTAL, ALL PATHWAYS	0.069	0.69	0.069	0.028	0.00028	NA	NA

a. The DOE public dose limit from all sources of ionizing radiation and exposure pathways that could contribute significantly to the total dose is 100 mrem/yr (1 mSv/yr) total effective dose equivalent. It does not include dose from background radiation.

b. The individual background dose was estimated to be 387 mrem or 0.387 rem in 2021, as shown previously in Table 7-8. The background population dose is calculated by multiplying the individual background dose by the population within 80 km (50 mi) of the INL Site.

c. NA = Not applicable.



8.3 Dose to the Public from Ingestion of Wild Game from the Idaho National Laboratory Site

The potential dose that an individual may receive from occasionally ingesting meat from game animals continues to be studied at the INL Site. These studies estimate the potential dose to individuals who may eat waterfowl that may briefly reside at wastewater disposal ponds at the ATR Complex and MFC, and game animals that may reside on or migrate through the INL Site.

8.3.1 Waterfowl

The maximum potential dose of 0.002 mrem ($0.02 \ \mu$ Sv) calculated for an individual consuming contaminated waterfowl based on 2021 sample results is lower than the dose estimated for 2020 ($0.078 \ mrem [0.78 \ \mu$ Sv]). As in the past, the 2021 samples were not collected directly from the warm wastewater evaporation ponds at the ATR Complex but from sewage lagoons adjacent to them. The dose calculation assumes the waterfowl resided at all the ponds while they were in the area.

8.3.2 Big Game Animals

A study on the INL Site from 1972–1976 conservatively estimated the potential whole-body dose that could be received from an individual eating the entire muscle (27,000 g [952 oz]) and liver mass (500 g [17.6 oz]) of an antelope with the highest levels of radioactivity found in these animals. This dose was 2.7 mrem (27 μ Sv) (Markham et al. 1982). Game animals collected at the INL Site during the past few years have generally shown much lower concentrations of radionuclides. In 2021, none of the game samples collected (e.g., eight elk and two mule deer) had a detectable concentration of ¹³⁷Cs or other human-made radionuclides. Therefore, no dose would be associated with the consumption of these animals.

The contribution of game animal consumption to the population dose are calculated because only a limited percentage of the population hunts game, few of the animals killed have spent time on the INL Site, and most of the animals that do migrate from the INL Site would have reduced concentrations of radionuclides in their tissues by the time they were harvested (Halford, Markham, and White 1983). The total population dose contribution from these pathways would, realistically, be less than the sum of the population doses from the inhalation of air, submersion in air, ingestion of vegetables, and deposition on soil.

8.4 Dose to the Public from Drinking Groundwater from the Idaho National Laboratory Site

Tritium has previously been detected in three U.S. Geological Survey monitoring wells located on the INL Site along the southern boundary (Mann and Cecil 1990; Bartholomay, Hopkins, and Maimer 2015; Twining et al. 2021). These wells, located in an uninhabited area, have shown a historical downward trend in tritium detections. The maximum concentration from all wells on the INL Site (4,280 ± 150 pCi/L) in 2021 is considerably less than the maximum contaminant level established by EPA for drinking water (20,000 pCi/L). An individual drinking water from a well with the maximum concentration would hypothetically receive a dose of 0.202 mrem (0.00202 mSv) in one year. Because these wells are not used for drinking water, this is an unrealistic scenario and the groundwater ingestion pathway is not included in the total dose estimate to the MEI.

8.5 Dose to the Public from Direct Radiation Exposure along Idaho National Laboratory Site Borders

The direct radiation exposure pathway from gamma radiation to the public is monitored annually using thermoluminescent dosimeters and optically-stimulated luminescent dosimeters, as previously shown in Figure 7-8.

In 2021, the external radiation measured along the INL Site boundary was statistically equivalent to that of background radiation and, therefore, does not represent a dose resulting from INL Site operations.



8.6 Dose to the Public from All Pathways

DOE O 458.1 establishes a radiation dose limit to a member of the general public from all possible pathways as a result of DOE facility operations. This limit is 100 mrem/yr (1 mSv/yr) above the dose from background radiation and includes the air transport, ingestion, and direct exposure pathways. For 2021, the only probable pathways from INL Site activities to a realistic MEI include the air transport pathway and ingestion of game animals.

The hypothetical individual, assumed to live at a farmhouse and cattle operation located 3.1 km south of Highway 20, and 3 km from INL Site's east entrance presented in Figures 8-1 and Figure 8-6, would receive a calculated dose from INL Site airborne releases reported for 2021 (Section 8.2.1) and from consuming a duck contaminated at the ATR Complex wastewater ponds (Section 8.3.1). No dose was calculated from eating big game animals in 2021 (Section 8.3.2).

The dose estimate for an offsite MEI is presented in Table 8-6. The total all-pathways dose was conservatively estimated to be 0.069 mrem (0.69 μ Sv) for 2021. This represents about 0.017 percent of the annual dose expected to be received from background radiation (387 mrem [3.8 mSv], as shown in Table 7-7) and is well below the 100 mrem/yr (1 mSv/yr) public dose limit above background established by DOE. As discussed in the Helpful Information section of this report, the 100 mrem/yr limit is far below the exposure levels expected to result in acute health effects.

The dose received by the entire population within 80 km (50 mi) of INL Site facilities was calculated to be 2.85×10^{-2} person-rem (2.85 x 10^{-4} person-Sv) identified in Table 8-5. This is approximately 0.00002 percent of the dose (136,779 person-rem, [1,368 person-Sv], Table 8-6) expected from exposure to natural background radiation in the region.

8.7 Dose to the Public from Operations on the Idaho National Laboratory Research and Education Campus

Facilities in the city of Idaho Falls that reported potential radionuclide emissions for inclusion in the 2021 NESHAP report include the IRC Laboratory (IF-603), DOE RESL (IF-683), and the National Security Laboratory (IF-611). These facilities are located contiguously at the IRC, part of the Research and Education Campus on the north side of the city of Idaho Falls. Though programs and operations at the IRC are affiliated with the INL, the IRC is located within the city limits of Idaho Falls and is not contiguous with the INL Site, the nearest boundary of which is approximately 35 km (22 mi) west of Idaho Falls. For this reason, the 2021 INL NESHAP evaluation (DOE-ID 2022) includes a dose calculation to a member of the public that is separate from the INL Site MEI. (Note: the Research and Education Campus source term was, however, included in the population dose calculation reported in Section 8.2.2.) The IRC MEI for calendar year 2021 is approximately 115 meters south-southeast of RESL. The effective dose equivalent to the MEI was conservatively calculated, using CAP88-PC, to be 0.0062 mrem/yr (0.062 μ Sv/yr), which is less than 0.1 percent of the 10-mrem/yr federal standard.

8.8 Dose to Biota

8.8.1 Introduction

The impact of environmental radioactivity at the INL Site on nonhuman biota was assessed using *A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota* (DOE 2019) and the associated software, RESRAD-Biota 1.8 (DOE 2019). The graded approach includes a screening method and three more detailed levels of analysis for demonstrating compliance with standards for the protection of biota. The threshold of protection is assumed at the following absorbed doses: 1 rad/d (10 mGy/d) for aquatic animals, 0.1 rad/d (1 mGy/d) for terrestrial animals, and 1 rad/d (10 mGy/d) for terrestrial plants.

The first step in the graded approach uses conservative default assumptions and maximum values for all currently available data. This general screening level (Level 1 in RESRAD-Biota) provides generic limiting concentrations of radionuclides in environmental media, termed "Biota Concentration Guides." Each biota concentration guide is the environmental concentration of a given radionuclide in soil or water that, under the assumptions of the model, would result in a dose rate less than 1 rad/d (10 mGy/d) to aquatic animals or terrestrial plants or 0.1 rad/d (1 mGy/d) to terrestrial animals. If the sum of the measured maximum environmental concentrations divided by the biota concentration guides



(e.g., the combined sum of fractions) is less than one, no negative impact to plant or animal populations is expected. No doses are calculated unless the screening process indicates a more detailed analysis is necessary. Failure at this initial screening step does not necessarily imply harm to organism populations. Instead, it is an indication that more realistic model assumptions may be necessary.

If the screening process indicates the need for a more site-specific analysis, an analysis is performed using siterepresentative parameters (e.g., distribution coefficients, bioconcentration factors) instead of the more conservative default parameters. This is Level 2 in RESRAD-Biota.

The next step in the graded approach methodology involves a site-specific analysis employing a kinetic modeling tool provided in RESRAD-Biota (Level 3). Multiple parameters that represent contributions to the organism internal dose (e.g., body mass, consumption rate of food/soil, inhalation rate, lifespan, biological elimination rates) can be modified to represent site- and organism-specific characteristics. The kinetic model employs equations relating body mass to internal dose parameters. At Level 3, bioaccumulation (the process by which biota concentrate contaminants from the surrounding environment) can be modeled to estimate the dose to a plant or animal. Alternatively, concentrations of radionuclides measured in the tissue of an organism can be input into RESRAD-Biota to estimate the dose to the organism.

The final step in the graded approach involves an actual site-specific biota dose assessment. This would include a problem formulation, analysis, and risk characterization protocol similar to that recommended by the EPA (1998). RESRAD-Biota cannot perform these calculations.

8.8.2 Terrestrial Evaluation

The division of the INL Site into evaluation areas based on potential soil contamination and habitat types is of particular importance for the terrestrial evaluation portion of the 2021 biota dose assessment. For the INL Site, it is appropriate to consider specific areas that have been historically contaminated above background levels. Most of these areas have been monitored for radionuclides in soil since the early 1970s (Jessmore, Lopez, and Haney 1994). In some of these areas, structures have been removed and areas cleaned to a prescribed, safe contamination level, but the soil may still have residual, measurable concentrations of radionuclides. These areas are associated with the facilities shown in Figure 1-4 and include:

- Auxiliary Reactor Area
- ATR Complex
- Critical Infrastructure Test Range Complex
- INTEC
- Large Grid, a 24-mile radius around INTEC
- MFC
- Naval Reactors Facility
- RWMC
- Test Area North.

For the initial terrestrial evaluation, the most recently measured maximum concentrations of radionuclides in INL Site soil were used, as discussed in Table 8-7. The table includes laboratory analyses of soil samples collected in 2005, 2006, 2012, 2015, and 2017 (soil samples were not collected on the INL Site in 2016, 2018, 2019, 2020, or 2021).

Using the maximum radionuclide concentrations for all locations in Table 8-7, a screening level analysis was made of the potential terrestrial biota dose. The soil concentrations are conservative because background concentrations were not subtracted. The analysis also assumed that animals have access to water in facility effluents and ponds. The maximum radionuclide concentrations reported in ponds at the INL Site were for the MFC Industrial Waste Pond presented in Table C-17. The results for uranium-233/234 (^{233/234}U) and ²³⁸U in Table C-17, 1.83 pCi/L and 0.58 pCi/ respectively, were thus



used to represent surface water concentrations. When ^{233/234}U was reported, it was assumed that the radionuclide present was ²³³U since doses due to ingestion and inhalation are more conservative for ²³³U than for ²³⁴U (EPA 2002).

The combined sum of fractions was less than one for both terrestrial animals (0.21) and plants (0.002) and passed the general screening test, as pointed out in Table 8-8. Based on the results of the graded approach, there is no evidence that INL Site-related radioactivity in soil is harming terrestrial plant or animal populations.

Tissue data from bats collected at or near INL facilities were also available and are previously presented in Table 7-4. Concentrations of radionuclides in tissue were input into the RESRAD-Biota computer model at the Level 3 step to calculate the internal dose to bats. The results of the dose evaluation to bats using radionuclide concentrations measured in tissue are shown in Table 8-9. The maximum dose received by bats at the INL Site was estimated to be 0.001 rad/d (0.01 mGy/d) in 2021. The calculated doses are well below the threshold of 1 rad/d (10 mGy/d). Based on these results, members of the bat population at the INL Site receive an absorbed dose that is within the DOE standard established for the protection of terrestrial animals.

8.8.3 Aquatic Evaluation

Maximum radionuclide concentrations reported in Table B-17 (results for the MFC Industrial Waste Pond) were also used for aquatic evaluation. Potassium-40 reported in ponds was assumed to be of natural origin and was not included in the 2021 calculations. The results shown in Table 8-10 indicate that INL Site-related radioactivity in ponds and liquid effluents is not harming aquatic biota. The combined sum of fractions was less than one for both aquatic animals (0.01) and riparian animals (0.003).

LOCATION ^a	DADIONIUCI IDE	DETECTED CONCI	DETECTED CONCENTRATION (pCi/g) ^b			
LUCATION	RADIONUCLIDE	MINIMUM	MAXIMUM			
ARA/CITRC	Cesium-134	4.0E-02	6.0E-02			
	Cesium-137	1.3E-01	3.0			
	Strontium-90	2.1E-01	3.7E-01			
	Plutonium-238		3.9E-03			
	Plutonium-239/240	1.3E-02	1.8E-02			
	Americium-241	5.5E-03	8.5E-03			
ATR Complex	Cesium-137	2.0E-1	6.1E-01			
	Strontium-90	c	5.8E-02			
	Plutonium-238	5.9E-03	4.3E-02			
	Plutonium-239/240	1.7E-02	2.2E-02			
EFS	Cesium-137	1.5E-01	6.8E-01			
INTEC	Cesium-134		8.0E-02			
	Cesium-137	3.0E-02	3.5			
	Strontium-90	4.9E-01	7.1E-01			
	Plutonium-238	2.5E-02	4.3E-02			
	Plutonium-239/240	1.1E-02	2.9E-02			
	Americium-241	6.1E-03	8.1E-03			
MFC	Cesium-134	4.0E-02	6.0E-02			
	Cesium-137	1.3E-01	4.9E-01			

Table 8-7. Concentrations of radionuclides in INL Site soils, by area.



		DETECTED CONCENTRATION (pCi/g			
LOCATION ^a	RADIONUCLIDE	MINIMUM	MAXIMUM		
000	Cobalt-60		5.0E-02		
	Plutonium-239/240	1.5E-02	2.9E-02		
	Americium-241	4.3E-03	1.2E-02		
RWMC	Cesium-137	1.4E-02	4.5E-02		
	Plutonium 239/240		2.4E-02		
	Cesium-134		6.0E-02		
	Cesium-137		3.3E-01		
	Plutonium-239/240	5.7E-03	1.6E-02		
	Americium-241	4.3E-03	9.7E-03		
TAN/SMC	Cesium-134	4.0E-02	6.0E-02		
	Cesium-137	1.1E-01	3.1		
	Plutonium-239/240	1.3E-02	1.7E-02		
	Americium-241	3.2E-03	5.7E-03		
All	Cesium-134	3.0E-02	9.0E-02		
	Cesium-137	1.4E-02	3.5		
	Cobalt-60		5.0E-02		
	Strontium-90	1.0E-02	7.1E-01		
	Plutonium-238	2.2E-03	4.3E-02		
	Plutonium-239/240	5.7E-03	9.5E-01		
	Americium-241 ^d	3.2E-03	6.2E-01		

Table 8-7. continued.

- ATR Complex = Advanced Test Reactor Complex; ARA/CITRC = Auxiliary Reactor Area/Critical Infrastructure Test Range Complex; EFS = Experimental Field Station; MFC = Materials and Fuels Complex; INTEC = Idaho Nuclear Technology and Engineering Center; RWMC = Radioactive Waste Management Complex; TAN/SMC = Test Area North/Specific Manufacturing Capability. See Figure 1-4.
- b. Legend:

a.	Results measu
b.	Results measu
с.	Results measu
d.	Results measu
e.	Results measu
f.	Results measu

Results measured in 2013-2014 using in situ gamma spectroscopy. Results measured by laboratory analyses of soil samples collected in 2005.

Results measured by laboratory analyses of soil samples collected in 2006.

- Results measured by laboratory analyses of soil samples collected in 2012.
- Results measured by laboratory analyses of soil samples collected in 2015.
- Results measured by laboratory analyses of soil samples collected in 2017.
- c. '----' indicates that only one measurement was taken and is reported as the maximum result.
- d. The data were the results of laboratory analysis for Americium-241 in soil samples.



TERRESTRIAL ANIMAL								
	WATER			SOIL				
NUCLIDE	CONCENTRATION (pCi/l)	BCGª (pCi/l)	RATIO	CONCENTRATION (pCi/g)	BCG (pCi/g)	RATIO		
Cobalt-60	-	1.19E+06	-	0.05	6.92E+02	7.23E-05		
Cesium-134		3.26E+05	_	0.09	1.13E+01	7.97E-03		
Cesium-137	-	5.99E+05	-	3.5	2.08E+01	1.69E-01		
Plutonium-238		1.89E+05	_	0.043	5.27E+03	8.16E-06		
Plutonium-239	-	2.00E+05	-	0.95	6.11E+03	1.55E-04		
Strontium-90		5.45E+04	_	0.71	2.25E+01	3.16E-02		
Uranium-233	1.83	4.01E+05	4.57E-06	-	4.83E+03	4.57E-06+00		
Uranium-238	0.58	4.06E+05	1.43E-06	-	1.58E+03	_		
SUMMED	-	-	6.00E-06	-	_	2.08E-01		
		TERRES	FRIAL PLA	NT				
	WA	ATER		SOIL				
NUCLIDE	CONCENTRATION (pCi/l)	BCG (pCi/l)	RATIO	CONCENTRATION (pCi/g)	BCG (pCi/g)	RATIO		
Cobalt-60		1.49E+07	_	0.05	6.13E+03	8.16E-06		
Cesium-134	-	2.28E+07	_	0.09	1.09E+03	8.28E-05		
Cesium-137	-	4.93E+07	-	3.5	2.21E+03	1.59E-03		
Plutonium-238	_	3.95E+09	_	0.043	1.75E+04	2.46E-06		
Plutonium-239	_	7.04E+09	_	0.95	1.27E+04	7.49E-05		
Strontium-90	_	3.52E+07	_	0.71	3.58E+03	1.98E-04		
Uranium-233	1.83	1.06E+10	1.73E-10	-	5.23E+04	_		
Uranium-238	0.58	4.28E+07	1.35E-08		1.57E+04	150- Jul		
SUMMED	_	_	1.37E-08	-	_	1.95E-03		

Table 8-8. RESRAD biota assessment (screening level) of terrestrial ecosystems on the INL Site (2021).

a. BCG = Biota Concentration Guide. Each radionuclide-specific BCG represents the limiting radionuclide concentration in an environmental medium which would not result in recommended dose standards for biota to be exceeded.





 Table 8-9. RESRAD biota assessment (level 3 analysis) of terrestrial ecosystems on the INL Site using measured

 bat tissue data (2021).

			-2111					
BAT DOSE (rad/d)								
NUCLIDE	WATER	SOIL	SEDIMENT	TISSUE ^a	SUMMED			
Cobalt-60	-	6.21E+-06	-	1.24E-04	1.30E-04			
Cesium-134	211.	1.05E-04	-	9.77E-05	1.05E-04			
Cesium-137	-	9.91E-05	-	1.01E-04	2.01E-04			
Plutonium-238		7.99E-07	-	7.98E-07	7.99E-07			
Plutonium-239/240	-	1.13E-08	-	7.17E-05	7.17E-05			
Strontium-90	-0	4.27E-06	-	8.78E-04	8.83E-04			
Uranium-233/234	4.56E-07	-	-	4.56E-07	4.56E-07			
Uranium-238	1.29E-07	-	-	1.27E-07	1.29E-07			
Zinc-65 ^b	-	-	-	9.26E-06	9.26E-06			
TOTAL	5.85E-07	2.15E-04	-	1.28E-03	1.40E-03			

a. Calculated using maximum concentrations measured in bat tissues.

b. The half-life of ⁶⁵Zn is 244.06 days. For this reason, the concentration measured in composited tissue is probably lower (by as much two times) than the original concentrations in the live bats.

AQUATIC ANIMAL								
WATER				SEDIMENT				
NUCLIDE	CONCENTRATION (pCi/l)	BCG ^a (pCi/l)	RATIO	CONCENTRATION (pCi/g)	BCG (pCi/g)	RATIO		
Uranium-233	1.83	2.00E+02	9.17E-03	0.0915	1.06E+07	8.63E-09		
Uranium-238	0.581	2.23E+02	2.60E-03	0.02905	4.28E+04	6.78E-07		
Summed	-	-	1.18E-02	-	-	6.87E-07		
RIPARIAN ANIMAL								
	WATER			SEDIMENT				
NUCLIDE	CONCENTRATION (pCi/l)	BCG (pCi/l)	RATIO	CONCENTRATION (pCi/g)	BCG (pCi/g)	RATIO		
Uranium-233	1.83	6.76E+02	2.71E-03	0.0915	5.28E+03	1.73E-05		
Uranium-238	0.581	7.56E+02	7.69E-04	0.02905	2.49E+03	1.17E-05		
SUMMED	_	_	3.48E-03	_	_	2.90E-05		

a. BCG = Biota Concentration Guide. Each radionuclide-specific BCG represents the limiting radionuclide concentration in an environmental medium which would not result in recommended dose standards for biota to be exceeded.

Tissue data from waterfowl collected on the ATR Complex wastewater ponds in 2021 were also available, as shown previously in Table 7-3. Concentrations of radionuclides in tissue can be input into the RESRAD-Biota code at the Level 3





step to calculate the internal dose to biota. To confirm that doses to waterfowl from exposure to radionuclides in the vicinity of the ATR Complex are not harmful, a Level 3 analysis was performed using the maximum tissue concentrations from Table 7-3. The waterfowl were assumed in the model to be riparian animals, accessing both aquatic and terrestrial environments in the area. External dose was calculated using the maximum radionuclide concentrations measured in soils around the ATR Complex and uranium concentrations in water. Concentrations of uranium in sediment were estimated by the RESRAD-Biota code from the concentrations in water.

Results of the dose evaluation to waterfowl using radionuclide concentrations measured in tissue are shown in Table 8-11. The estimated dose to waterfowl was calculated by RESRAD-Biota to be 4.48×10^{-4} rad/d (4.48×10^{-2} mGy/d). This dose is significantly less than the standard of 1 rad/d (10 mGy/d). Based on these results, there is no evidence that water held in ponds at the INL Site is harming aquatic biota.

8.9 Unplanned Releases

In 2021, the INL Site had no events that resulted in emissions exceeding reporting thresholds. All radiological emissions were accounted for in the dose received by the maximally exposed individual.

Table 8-11. RESRAD biota assessment (level 3 analysis) of aquatic ecosystems on the INL Site using measured waterfowl tissue data (2021).

WATERFOWL DOSE (rad/d)							
NUCLIDE	WATER ^a	SOIL ^b	SEDIMENT	TISSUE	SUMMED		
Cesium-134	-	5.37E-06	-	-	5.37E-06		
Cesium-137	_	7.58E-05	_	_	7.58E-05		
Cobalt-60	_	4.97E-06	_	2.38E-06	1.16E-04		
Plutonium-238	_	1.76E-10	_	_	1.76E-10		
Plutonium-239	_	1.94E-09	_	_	1.94E-09		
Strontium-90	_	5.14E-07	_	1.12E-05	1.17E-05		
Uranium-233	2.70E-04	NA	1.72E-06	2.72E-04	2.72E-04		
Uranium-238	7.55E-05	NA	5.03E-07	7.60E-05	7.60E-05		
TOTAL	3.46E-04	8.67E-05	2.23E-06	3.62E-04	4.48E-04		

a. Only uranium isotopes were measured in the Material and Fuels Complex Industrial Waste Pond. Hence, doses were not calculated for other radionuclides in water and sediment.

b. External doses to waterfowl were calculated using soil concentrations. Maximum concentrations of radionuclides measured in soil at the INL Site were used (Table 8-7). Note: NA=uranium isotopes were not analyzed for in soil.

c. Internal doses to waterfowl were calculated using maximum concentrations in edible tissue shown in Table 7-3. Note: NA=uranium isotopes were not analyzed for in tissue samples.

8.10 References

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