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RELIABLE PREDICTIONS OF WASTE PERFORMANCE IN A GEOLOGIC REPOSITORY

Thomas H. Pigford and Paul L. Chambre

Department of Nuclear Engineering and Lawrence Berkeley Laboratory
University of California
Berkeley, California 94720
Telephone 415/642-6469

ABSTRACT

Establishing reliable estimates of long-term performance of a waste repository requires emphasis upon valid theories to predict performance. Predicting rates that radionuclides are released from waste packages cannot rest upon empirical extrapolations of laboratory leach data. Reliable predictions can be based on simple bounding theoretical models, such as solubility-limited bulk-flow, if the assumed parameters are reliably known or defensibly conservative. Wherever possible, performance analysis should proceed beyond simple bounding calculations to obtain more realistic--and usually more favorable--estimates of expected performance. Desire for greater realism must be balanced against increasing uncertainties in prediction and loss of reliability. Theoretical predictions of release rate based on mass-transfer analysis are bounding and the theory can be verified. Postulated repository analogues to simulate laboratory leach experiments introduce arbitrary and fictitious repository parameters and are shown not to agree with well-established theory.

I. INTRODUCTION

The Performance Assessment National Review Group¹ recommended that the U. S. geologic repository projects give greater emphasis to realistic and reliable predictions of long-term performance of repositories. Predictive reliability, the assurance that the actual performance will be as good or better than that stated by the performance prediction, is essential for any engineering project and particularly for a geologic repository, because real-time testing to confirm the repository design and to confirm the predictions of long-term performance is impossible. In any system design the use of well established and easily verified calculational techniques to establish the bounding values of predicted performance must be balanced with the desire to refine the performance prediction for greater realism. To predict what happens in tens of thousands of years in a repository we must emphasize sound theories of prediction, more so than in conventional engineering design wherein performance can be predicted, validated, and remedied by real-time testing. Here we review the state of technology for predicting the long-term rate of dissolution of radionuclides from waste packages in a repository.

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II. MECHANISTIC ANALYSIS OF RADIONUCLIDE RELEASE RATES

A. Release Estimates For Saturated Bulk Flow

Bounding analyses can be used to establish predictive reliability and to estimate limiting features of system behavior. In some instances, physically unrealistic assumptions or input values are used to obtain a conservative "bounding result".

1. Bounding estimates of repository release rates. To calculate radionuclide release rates from a repository, some projects have assumed unrealistically that all ground water flowing through the repository becomes saturated by the radioelements in the waste or by the waste matrix. If the values chosen for the saturation concentrations and water flow rates are defensible, then the calculated releases are defensible as conservative upper bounds and are expected to be reliable.

Wherever possible, performance analysis should proceed beyond simple bounding calculations to obtain more realistic--and usually more favorable--estimates of expected performance¹. For example, because the emplaced waste packages are discrete and separated from each other, it is impossible for all water potentially flowing through a repository to become saturated with any waste constituent, assuming that it is not already saturated with that constituent before encountering the waste and assuming no large changes in saturation concentration in the repository environment. Concentrations near saturation are expected only in the liquid immediately adjacent to the waste surface. All other water will be below the saturation concentration, and the average concentration in ground water leaving the repository will be below saturation. Thus, a more realistic calculation of repository release rates, if suitably reliable, is likely to be preferable to the extreme conservatism of saturated bulk flow.

Although this simple theory of saturated bulk flow is conservatively bounding for estimating releases from a repository, it does not lead to conservative or bounding estimates of release rates from waste packages into the rock at the low flow rates predicted for the U.S. repository projects, as is explained below.

2. Nonbounding estimates of waste-package release rates. The tuff project² estimates release rates from a waste package by multiplying the saturation concentration of the waste matrix by the volume flow rate of ground water that is calculated to flow through rock equal in cross section to the cross sectional area of the waste canister. Whether partial or full repository flow rates are assumed, the results are not necessarily bounding or conservative for waste-package release rates, because zero waste-package release rate will be incorrectly predicted at zero flow. If there are pathways for molecular diffusion of dissolved species from the waste surface into surrounding stagnant groundwater, a finite transient release of dissolved species into the rock will occur. The ground water infiltration velocities predicted for tuff are so low, about 0.003 to 1 mm/year, that transient diffusional release will be more important than convective transport if the

waste solid is conservatively assumed to be surrounded by groundwater and moist tuff. Although the rate of diffusional release into the rock must eventually, at steady state, equal the repository release rate for long-lived species, steady state will not be approached for thousands of years in a low-flow repository, and the transient diffusional release into the rock can control the waste package release rates for long times.

To develop a more reliable prediction that can be defended as conservative and bounding, a more mechanistic analysis of mass transfer of radionuclides to ground water could be adopted.

B. Mass-Transfer Analysis of Release Rate

Mass-transfer analysis is a general approach, highly refined in the field of chemical engineering³, to predict rates of transport of species within a phase and between phases, as affected by diffusion, convection, chemical reaction, adsorption, etc. It quantifies the actual mechanisms affecting the transport rate. An application by Chambre' et al.⁴⁻⁹ to a waste package surrounded by wet porous rock conservatively assumes that all the waste solid is suddenly exposed to ground water when the corrosion-resistant barrier fails, and it conservatively assumes saturation concentration of dissolved radioelements in the liquid at the waste surface. Exact theoretical analysis of the diffusive-convective transport of the dissolved species from the waste surface into the surrounding porous rock results in an upper limit to the time-dependent dissolution rate that can occur.

Though more realistic than saturation bulk flow, Chambre's mass-transfer analysis for a bare waste solid is still conservatively unrealistic in neglecting the finite resistance to mass transfer presented by the partly failed waste canister and fuel cladding. It is further conservative in application by assuming saturation concentrations at the waste surface. More detailed mechanistic analysis¹⁰ shows that saturation concentration is a close approximation to reality for borosilicate glass and for the spent-fuel matrix for all but the very early time of exposure in a repository. The theory contains no arbitrary adjustable parameters. For steady-state release rate it requires experimental data on saturation concentrations, diffusion coefficients, porosity, ground water approach velocity, as well as specifications of waste size and geometry. For transient releases, data on sorption retardation coefficients are also required. Because of the saturation boundary condition, information on degree of waste cracking and solid-liquid reaction rate does not enter the prediction. Even if solid-liquid reaction rate is included as a boundary condition, increased reaction surface from cracking of glass waste does not appreciably affect the dissolution rate after the first few days of exposure to groundwater.

The important feature of this mass-transfer analysis is not that it predicts favorably low dissolution rates for most radionuclides, but that it is a mechanistic theory based on well-understood governing equations and conservatively bounding boundary conditions. The theory itself can be examined in detail. It can be subjected to verification in experimental real-time tests, as has been done at the Pacific Northwest Laboratory¹¹. Such theories are the only reliable means of extrapolating into the future.

A similar theoretical mass-transfer analysis of time-dependent radionuclide release from a suddenly exposed waste form surrounded by backfill and rock is now used by the basalt project¹. Although the salt project has based its waste-package release rates on a simple bounding calculation of the rate of brine inflow to an emplacement cavity, multiplied by the individual radioelement solubility, this approach is unrealistic and unnecessarily conservative because the salt will soon be consolidated against the waste package. More realistically, and now more reliably, one can calculate radionuclide release by calculating the diffusive transport from a brine layer at the waste surface into brine-filled grain boundaries in the surrounding salt¹². The convective-diffusive mass transfer from the waste surface into interbed flows that may intersect the waste package can also be calculated, similar to the mass-transfer calculations used by Neretnieks¹³ to predict container corrosion and waste-package release rates for the KBS project.

C. Some Results of Mass-Transfer Predictions of Release Rates

The profiles of ground water flow and concentration of a dissolved species for a simple waste solid surrounded by porous rock are shown in Figure 1. The diffusion-and-flow calculation by Chambre⁴⁻⁹ uses the known distribution of ground water velocities around an infinite cylinder through pores in the surrounding rock. A general solution to the time-dependent dissolution rate of a radioelement with a constant boundary concentration N_i^* at the inner surface of the borehole has been given by Chambre⁷.

1. Steady-state diffusive-convective dissolution rates

The fractional rate of dissolution f_i of the elemental species i and its isotopes from a long waste cylinder of radius R is calculated at steady state to be:

$$f_i = \frac{8 N_i^* \epsilon \sqrt{DU}}{(\pi R)^{3/2} n_i} , \quad \frac{UR}{D} > 4 \quad (1)$$

where D is the specie diffusion coefficient in pore liquid, U is the pore velocity of ground water before it comes near the waste, ϵ is the porosity of the surrounding rock, and n_i is the bulk density (g/cm^3) of the elemental species i in the waste. For a bounding calculation, N_i^* is chosen as the saturation concentration. For a waste cylinder of finite length L end effects are accounted for by multiplying the right-hand side of Equation (1) by a correction factor $(1 + R/L)$.

Table I gives estimated values^{4,14} of the solubility of silica and the solubilities in water of radioelements in borosilicate glass waste. Also listed are the bulk densities and the calculated fractional release rates for a typical glass waste exposed to groundwater at an approach velocity of 1 m/yr in rock of 1 percent equivalent porosity. The assumed diffusion coefficient of $10^{-5} \text{ cm}^2/\text{s}$ is typical for an electrolyte in water. It conservatively neglects the effect of tortuosity¹⁵, which in granite can result in more than a 100- to 1000-fold¹⁶⁻¹⁸ reduction in D and more than a 10-fold to 30-fold reduction in estimated dissolution rates. Because the fractional dissolution rates of the low-solubility elements are lower than those of the silica

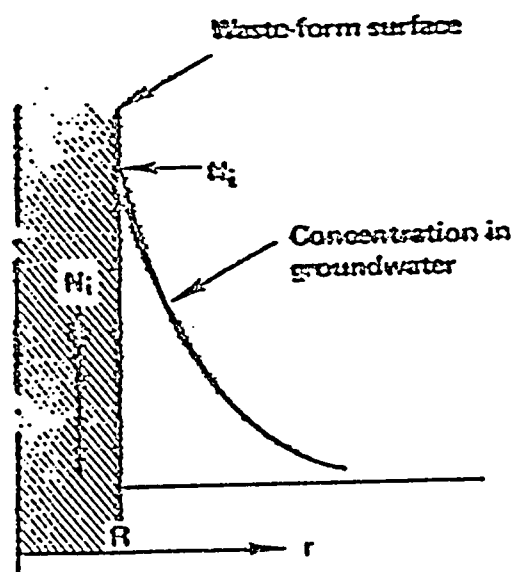
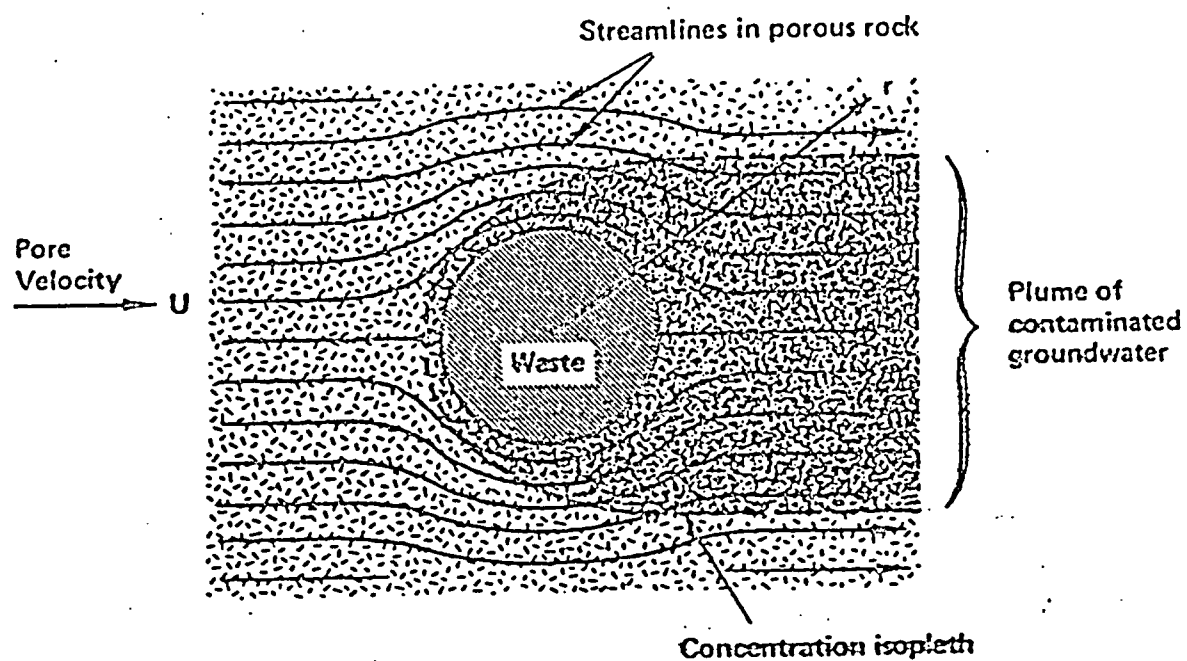


Figure 1
Flow of ground water past a waste cylinder;
concentration profile

TABLE I
Calculated Fractional Dissolution Rates for Commercial Borosilicate Glass Waste

Waste cylinder radius: 0.13 m				
length: 2.46 m				
Amount of uranium ^a : 460 kg				
Constituent	Solubility, ^b g/cm ³	Concentration in glass, g/cm ³	Calculated fractional dissolution rate ^c yr ⁻¹	Observed fractional dissolution rate ^d yr ⁻¹
SiO ₂	5 × 10 ⁻³	1.6	1 × 10 ⁻⁶	2 × 10 ⁻³
U	1 × 10 ⁻⁹	1.2 × 10 ⁻²	4 × 10 ⁻⁹	2 × 10 ⁻⁶
Np	1 × 10 ⁻⁹	1.9 × 10 ⁻³	2 × 10 ⁻⁸	7 × 10 ⁻⁴
Pu	1 × 10 ⁻⁹	1.1 × 10 ⁻⁴	4 × 10 ⁻⁷	3 × 10 ⁻⁵
Am	1 × 10 ⁻¹⁰	3.6 × 10 ⁻⁴	1 × 10 ⁻⁸	3 × 10 ⁻⁵
Se	1 × 10 ⁻⁹	1.4 × 10 ⁻⁴	3 × 10 ⁻⁷	
Sn	1 × 10 ⁻⁹	9.4 × 10 ⁻⁵	5 × 10 ⁻⁷	
Tc	1 × 10 ⁻⁹	1.9 × 10 ⁻³	2 × 10 ⁻⁸	

a/ Amount of uranium initially in pressurized water-reactor fuel to produce the radionuclides contained in the waste.

b/ For amorphous SiO₂¹⁴. Other solubilities are from Krauskopf⁴, at 20°C, moderately reducing conditions.

c/ Steady-state dissolution rates calculated from Equation (1) for diffusive-convective mass transfer. Ground water pore velocity = 1 m/yr. $D = 3.2 \times 10^{-2} \text{ m}^2/\text{yr}$.

d/ Data of Mayay et al.¹⁹ for IAEA-type leach tests, with periodic replacement of leachant.

TABLE II

Calculated Fractional Dissolution Rates for Commercial Spent Fuel

Waste cylinder radius = 0.43 m

length = 2.46 m

Amount of initial uranium = 2770 kg

<u>Constituent</u>	<u>Concentration in spent fuel, g/cm³</u>	<u>Fractional dissolution rate,^a yr⁻¹</u>
U	1.2	2×10^{-12}
Hp	6.2×10^{-4}	3×10^{-9}
Pu	1.2×10^{-2}	2×10^{-10}
Am	1.1×10^{-4}	2×10^{-9}
Se	6.4×10^{-5}	3×10^{-8}
Sn	1.5×10^{-4}	1×10^{-8}
Tc	9.5×10^{-3}	2×10^{-10}

^{a/} Steady-state dissolution rates calculated from Equation (1) for diffusive-convective mass transfer. Ground water pore velocity = 1 m/yr. $D = 3.2 \times 10^{-2} \text{ m}^2/\text{yr}$. Solubilities from TABLE I.

matrix, these elements do not dissolve congruently with the matrix, forming precipitates as the matrix dissolves.

Table I gives values of fractional dissolution rates for silica and for various radioactive elements¹⁹ in borosilicate glass, calculated from experimental data reported from IAEA-type laboratory experiments in which leachant is periodically replaced. For substances of limited solubility, the values of f_i computed from Equation (1) are smaller than those derived from laboratory leach tests, as is expected. For slightly soluble species in waste that has been embedded in a repository rock, the slow diffusion and slow movement of the liquid around the waste containers may be more significant in controlling the net rate of dissolution than the rate at which substances in the waste solid react with the surface liquid. If the solubility is very small, the rate of escape into groundwater will be determined primarily by the solubility, the properties of the porous rock, and the ground water velocity; if the solubility is sufficiently large, the kinetics of the interaction between the solid waste constituents and water may dominate.

In Table II are calculated fractional dissolution rates at steady state for a waste package of commercial spent fuel. Because of the large inventory of uranium, its fractional dissolution rate is much lower than for borosilicate glass and is lower than that calculated for low-solubility fission products and other actinides. Therefore, unless there is a mechanism for waste constituents to be preferentially released from the UO_2 matrix more rapidly than the matrix dissolves, all of the listed species should dissolve congruently at the fractional dissolution rate of uranium.

2. Steady-state diffusion-controlled dissolution rates. In most of the repository designs the ground water velocity is so low that the convective component of the release from the waste form is negligible, Equation (1) is not applicable, and an alternate form developed by Chambre⁷ for a prolate spheroidal waste solid must be used:

$$f_i = \frac{\beta \epsilon D N_i^*}{n_i}, \quad U \rightarrow 0 \quad (2)$$

where β is a geometrical parameter that can be calculated from the waste-form dimensions:

For a sphere of radius R

$$\beta = \frac{3}{R^2} \quad (3)$$

For a prolate spheroid waste of semiminor axis b and eccentricity e

$$\beta = \frac{3e}{b^2 \ln[\coth \frac{\alpha_s}{2}]} , \quad \alpha_s = \cosh^{-1} \left(\frac{1}{e} \right) \quad (4)$$

Using the properties listed in Table I, the limiting low-velocity fractional release rates are calculated to be about a fourth of those calculated for a

pore velocity of 1 m/yr, which illustrates the nonconservatism (see II A.2) in neglecting diffusional transport at pore velocities of the order of a few millimeters per year.

The time to reach steady state increases from the few years for a pore velocity of 1 m/yr to tens of thousands of years for near-zero velocities⁸. Sorption parameters do not enter these equations for steady-state release of long-lived radionuclides, but sorption increases the transient dissolution rate and the time to reach steady state^{8,9}.

3. Extensions of the mass-transfer analysis. In subsequent studies Chambre⁷ has extended the mass-transfer analyses to consider the effect of a backfill layer between the waste package and rock²⁰, the increased dissolution rates that can result when the concentration profile is steepened by radioactive decay and sorption⁹, the effect of nonlinear sorption characteristics of backfill²¹, the effect of repository heating on mass transfer and release rate²², and the rate of release of species that have already diffused from the UO₂ matrix in spent fuel and are readily accessible as soluble constituents in the fuel voids and fuel-cladding gap.

4. Use of laboratory leach-rate data. If one wishes to include the solid-liquid reaction rate as part of a more comprehensive model of waste-package performance in a repository, a concentration-dependent reaction rate should be used as a boundary condition at the waste-form surface, with the concentration in the surface liquid determined by the calculated time-dependent rate of mass transfer into the exterior porous or fractured rock. Zavoshy et al.¹⁰ show that when the boundary condition of constant surface concentration is replaced by an experimentally measured concentration-dependent solid-liquid reaction rate, obtained from laboratory leach data for glass, the calculated dissolution rate approaches that from the simple model of saturation in surface liquid within a few years after emplacement, and the surface concentration at steady state deviates in only a minor way from saturation for the low-solubility components. Therefore, the complication of a reaction-rate boundary condition is not necessary when the low-solubility elements approach saturation in surface liquid at times that are short compared to the times of interest in repository performance analysis, and the reliability of long-term prediction does not suffer from the uncertain extrapolation of laboratory leach-rate data.

5. Effect of borehole water. A recent mass transfer analysis by Chambre²³ shows that the volume of ground water trapped within the borehole and waste package introduces only a short time delay in the rise in concentration of dissolved species at the waste surface. Within the long times important in repository performance analysis, and for the low-solubility waste constituents, the concentration within the borehole liquid approaches saturation and the dissolution rate is controlled by the rate of mass transfer into the backfill or rock. Thus, assuming³⁰⁻³³ that borehole water represents an equivalent volume of confined leachant to use in applying a laboratory leach correlation (cf. III B.1,2) ignores the important long-term release mechanisms in a repository, and it does not produce a conservative or bounding estimate of release rate. Because of the empirical extrapolation of real-time

laboratory data, it cannot be a reliable technique to predict long-term releases.

6. **Reliability and validation.** Although these mass-transfer theories unrealistically assume that all waste solids are suddenly and completely exposed to groundwater, these theories predict compliance with the numerical performance criteria for most of the radioelements in glass and spent fuel. Because the mass-transfer theories are mechanistic, mathematically formulated, exact, and require only a few directly measurable parameters, they are readily adapted to testing for validity and can be expected to result in reliable predictions of long-term performance, although still conservative and not realistic in all detail that might be desired. As the complexity increases, more phenomena, assumptions, and input data must be validated, and predictive reliability becomes more difficult, as illustrated below.

D. Effect of Partly Failed Protective Waste Containers

Further realism is usually expected to result in lower predicted releases from the waste package. For example, not all of the protective container is expected to fail at once, and releases from the waste solid will likely be reduced by the tortuous pathways through the partly failed outer layers and corrosion products. The multicomponent corrosion products can result in solid phases with low saturation concentration of contained radioelements. The protective features of these more realistic phenomena should be taken into account, where possible. However, in any predictive effort there is a compromise between the increased detail for realism as contrasted with the loss of predictive reliability, when the greater detail invokes additional physical parameters and requires more data and validation than may be possible within available resources and time.

The WAPPA code²⁴, listed by all of the repository projects as one of their system codes for predicting waste-package performance, predicts release rates by finite-difference calculations of molecular diffusion through backfill. One of the several unjustified approximations¹ made in the WAPPA release-rate calculation is to assume that diffusional transport through holes of known area in the container is given by the diffusional transport from a bare waste solid multiplied by the ratio of hole area to total area. In attempting to be more realistic by taking into account partial container failure, predictive reliability suffers in two ways: (1) data are required on the time-dependent extent of container failure, including the number, size, and spacing of penetrations, and (2) the assumption of release rate proportional to hole area is incorrect when the holes are small.

Chambre's analytical solution²³ for diffusion through well-separated holes shows that for small holes the area proportionality assumed by WAPPA is not obeyed. As shown in Figure 2, if the equivalent hole radius is 1 mm and if the total hole area is about 0.05 percent of the container area, the rate of diffusive transport through the holes is the same as if no container material were present²⁵. This is a consequence of the large concentration gradients and large diffusive fluxes near the hole edges, and it may explain observations by Johnson et al.²⁶ of large releases of cesium through small apertures in Zircaloy cladding. Of course, the holes could become plugged

with corrosion products, or the failure phenomena may be such that containers are penetrated by only a few openings, so that the net release rate could be appreciably lower than that of a bare waste solid. However, even if there are enough container holes to remove the container as an important barrier, the mass-transfer rates will remain low because of the slow diffusive-convective transport through surrounding backfill and rock.

Obtaining sufficient data to reliably predict the effect of partial failure of waste containers on release rate is a challenge to experiment and theory.

E. Effect of Statistically Distributed Container Failures

The Nuclear Regulatory Commission requires²⁷ that the yearly release rate of a radionuclide from engineered barriers in a geologic repository be no greater than 10^{-5} times the 1,000-year inventory of that radionuclide or 10^{-8} times the total curie inventory of all radionuclides at 1,000 years. For the simple analogue of a bare waste solid surrounded by rock, the release rate would equal the dissolution rate estimated by Equations (1) and (2) for steady state or by the analytical solutions for the transient dissolution^{7,8,10}. If a backfill is present, the release rate would be the mass-transfer rate calculated at the backfill-rock interface^{8,9,20}.

If the NRC release-rate criterion is to be applied to the entire ensemble of waste packages in a repository¹, the statistical distribution of waste-package container failures can affect the average release rates for the repository.

At a given time t the average fractional release rate $f(t)$ of the repository inventory of a radionuclide, based on the radionuclide inventory at 1,000 years, is a statistically weighted average of the fractional release rates from the waste packages failed up to time t . At time t the fractional release rate from a package whose container fails at time t' after emplacement is $f_p(t, t')$, and the failure probability per unit time at time t' is $p(t')$. The fraction of containers failing in the time span between t' and $t' + dt'$ is $p(t')dt'$, so the repository-average fractional release rate of the radionuclide is given by:

$$f(t) = \int_0^t f_p(t, t') p(t') dt' \quad (5)$$

The repository averaged fractional release rate will not differ much from the single-package fractional release rate for low-solubility long-lived species if waste dissolution continues after all containers have failed. It will be lower than the single-package release rate for soluble long-lived species that are available for rapid dissolution once the waste container fails, such as cesium-135 and iodine-129 in the gap activity in spent fuel.

1. Illustration for cesium-137. Statistically distributed container failures do not necessarily result in repository-average release rates lower than those for individual waste packages. To illustrate, we consider the release of cesium-137 from glass waste²⁸. We assume that the cesium dissolves congruently with silica and apply Chambre's²³ analytical solution for the

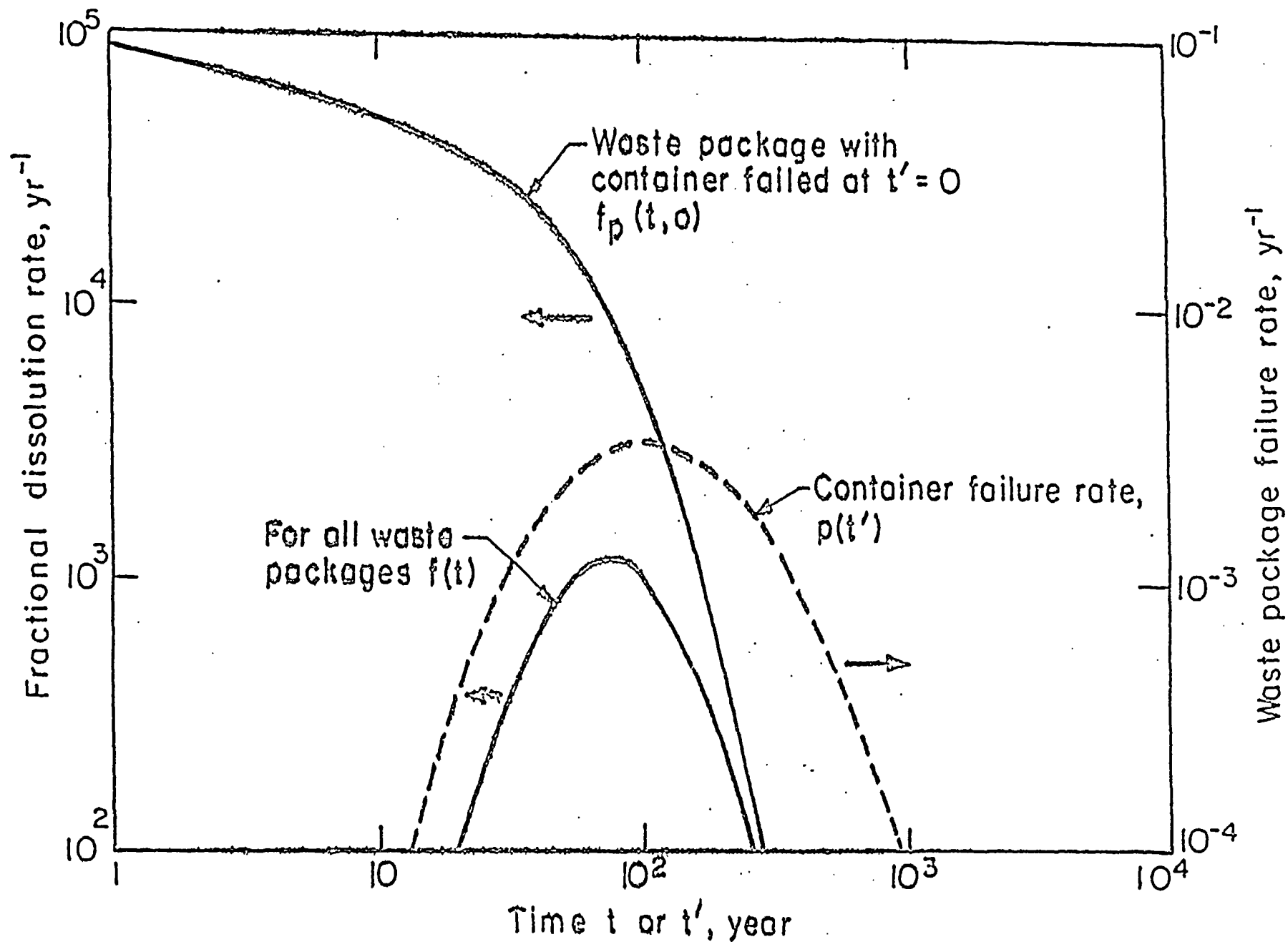


Figure 3. Normalized release rate of cesium-137 from borosilicate glass waste, effect of a lognormal distribution of container failures (mean time to failure = 300 years, deviation = 300 years) XBL857-6385

time-dependent fractional dissolution rate from a spherical waste surrounded by porous rock, for a silica solubility of 200 g/m^3 , and for a waste package containing initially 270 kg of silica and 0.45 kg of cesium-137. The single-package fractional dissolution rate of cesium-137, for a container that fails at the time of emplacement, is shown in Figure 3. Because of the low 1,000-year inventory of 30-year cesium-137, the fractional dissolution rate is very large at early times before cesium-137 has decayed. However, if the container does not fail for 300 years, most of the cesium-137 will have decayed and the single-package fractional dissolution rate will be much smaller than the calculated equivalent fractional release limit of 0.02/year.

Assuming that the container failure rate is governed by a log-normal distribution with mean time to failure of 300 years and a deviation of 300 years, we obtain the repository-average fractional dissolution rate of cesium-137 shown in Figure 3. The consequence of a statistical distribution of container failures is to allow earlier container failures and to increase the average normalized dissolution release rate of cesium-137. The calculated release rate of cesium-137 into rock will be much smaller if a sorbing backfill is present or if the low effective solubility (10^{-3} g/m^3) recently measured for cesium in defense glass²⁹ is considered.

2. Data needed for reliable prediction. Data on the probability distribution of container failures are necessary for reliable prediction of repository-average release rate, placing additional demands on the experiments and performance assessment to establish container failure modes.

III. NONMECHANISTIC ESTIMATES OF WASTE-PACKAGE RELEASE RATE

A. Use of Laboratory Leach Data to Predict Radionuclide Release Rates

Beginning over twenty years ago laboratory leaching experiments have been performed on borosilicate glass and other candidate waste forms. Typically, a small sample of a waste-form material is exposed to a leachant liquid in a vial kept at constant temperature. The leachant is periodically analyzed for the concentration of dissolved constituents. Most data are reported for leach times of about one month, but some leach times of a few years have also been reported. Many publications propose correlations of the rate of dissolution of silica from borosilicate glass, and a few extend the correlations to radioelements contained in glass waste. Some of the correlations are structured in a way to suggest possible mechanisms that control dissolution rate, such as surface films, sorption, etc., but all of the correlations are empirical and include several arbitrary and adjustable parameters that are determined by curve fitting to laboratory data.

In 1980 the Waste Isolation System Panel⁴ (WISP) of the National Research Council began a three-year study that included an evaluation of the applicability of these laboratory leach data to predict release rates from waste solids in a geologic repository. In 1981 the panel concluded that (1) there is no reliable basis for extrapolating the empirical correlations of laboratory leach data to predict release rates at exposure times thousands of times longer than encountered in the experiments, and (2) the repository analogue proposed as a means of using the laboratory leach data is a

nonmechanistic postulate and is not valid. The analogue problems are discussed in the WISP report and are summarized below.

B. Postulated Repository Analogues for Predicting Releases

The laboratory leach experiments measure the net rate of reaction between the leachant and the solid surface. In the liquid-continuum leachant no appreciable concentration gradients are expected, so the exterior-field diffusive-convective transport processes that control the dissolution rate in a repository environment are not present in the laboratory experiments. The buildup of corrosion products within the leachant can affect the rate of dissolution of the waste samples, so the ratio S/V of sample surface S to leachant volume V is used as a correlating parameter; a larger S/V results in more rapid increase in concentration of dissolution products in the liquid, more rapid approach to saturation, and more rapid reduction in leach rate.

1. Repository S/V based on borehole water. Various proposals have been made³⁰⁻³³ to extrapolate the laboratory leach-rate data to repository conditions by adopting the laboratory data taken at the same S/V ratio that is presumed to exist for the waste package in a repository. Although, it has been pointed out that there is no meaning to an equivalent volume of ground water in contact with the surface area of each waste package⁴, it is still assumed by some^{31,32} that there is a repository analogue of the laboratory leach experiment. The assumption³¹⁻³³ that the equivalent repository water volume associated with a waste package is the volume of water in waste-package voids and in the bore-hole annulus leads to a prediction of zero steady-state release, because the concentration in this assumed confined liquid volume will reach saturation.

However, because the borehole liquid is, in fact, not confined, dissolved species will transport into surrounding porous medium by diffusion and convection in pore water, the mechanisms considered in the mass-transfer analyses by Chambre' et al. and others. Release will continue at a finite rate, the solute concentration in the bore-hole liquid will fall slightly below saturation, and solid-liquid reaction at the waste surface will proceed at a steady-state rate equal, for long-lived species, to the rate of diffusive-convective transport into the exterior pores.

2. Postulates of ground water residence time and volume. Macedo et al.³⁰⁻³² have obtained laboratory leach data for glass waste powder with periodic partial replacement of leachant, simulating a small and continuous leachant flow through a leach-test vial with well-mixed solid and liquid. At early times the dissolution rates are controlled by the solid-liquid reaction rate, which decreases with increasing concentration of solute. At later times the dissolution rate is found to be proportional to the volumetric rate of replacement of leachant, suggesting that an equivalent saturation concentration has been reached and that the release rate is given by the simple bulk-flow saturation-limited calculation discussed in II A above. The diffusive-convective transport mechanisms that control the net release in a repository environment are not present in these experiments. Macedo et al. empirically correlate their leach data with the ratio S/V of powder surface to leachant volume and the average residence time T_r of leachant, the latter

determined by dividing the leachant volume by the volumetric replacement rate of leachant.

To apply their empirical correlation of laboratory leach data to predicting waste performance in a repository, Macedo et al.^{31,32} propose a repository analogue that has waste fragments well stirred with a specified volume of ground water associated with each waste package, with a specified volumetric flow of ground water through the well-stirred volume. For a waste solid surrounded by a large volume of wet rock, they propose that the leachant volume be identified as the volume of voids initially inside the waste container, which will become filled with water when the waste container fails. Here they do not include water that may be in the gap between the waste package and rock. They propose that the volumetric flow through this well-mixed container of waste fragments and void water be identified as the upstream Darcy velocity of ground water multiplied by the projected cross-sectional area of the solid waste. They do not consider the effect of any backfill between the waste package and rock, and they equate NRC's fractional release rate with the fractional dissolution rate. The expected fractional dissolution rate when liquid in contact with the waste is at concentration N_i is then estimated by Macedo et al. to be:

$$f_i = \frac{N_i V}{m_i T_R S} \quad (6)$$

where m_i is the mass of species i in the waste solid per unit surface area of solid. It is clear that this analogue distorts the physical situation in the repository. Contrary to the assumptions of Macedo et al., fragmented waste is not well stirred with void water and with any water that may flow through the waste. If the waste solid has finite flow permeability, the actual rate of flow through the waste will depend on the ratio of waste solid permeability to the permeability of surrounding backfill and rock, and it can depart considerably, and either direction, from that estimated by Macedo et al.

More importantly, dissolved species can and will diffuse into surrounding backfill and rock and will be transported by diffusion and convection into a much larger volume of flowing water than estimated from the Macedo analogue. If the analogue were correct, Equation (6) would become identical with the diffusive-convective Equation (1) as the waste permeability becomes very small, resulting in no volumetric replacement of void water and an infinite void-water residence time. However, Equation (6) would incorrectly predict zero dissolution, whereas the dissolution rate from Equation (1) is finite. As another test, as the volume of void water goes to zero Macedo's Equation (6) predicts zero dissolution rate. In contrast, Equation (1) was derived for a waste solid in contact with wet rock and it correctly predicts finite dissolution rate whether or not void water is present. Because Equation (1) is for steady-state dissolution rate, it applies also to a waste package with finite void water, provided that the radius R is taken as the radius of the bore hole. Also, applying Macedo's Equation (6) to a repository would overlook the effect of rock porosity, an important parameter that affects the waste dissolution rate, as shown in

Equation (1). The repository analogue proposed by Macedo et al. for finite convective flow is unrealistic and results in nonconservative predictions.

Recognizing that exterior-field diffusion can affect the dissolution rate in a repository, Macedo et al.^{31,32} propose that at low ground water flow rates the equivalent contact time of ground water to be used in Equation (6) be calculated by:

$$T_r = \frac{d^2}{KD}$$

where d is the waste diameter, K is the retardation coefficient, and D is the coefficient for molecular diffusion in ground water in the rock pores. If Equation (7) were corrected by moving the retardation coefficient to the numerator, T_r would be the time for a diffusion front to travel a distance d in a sorbing medium. However, it has not been explained why this transient diffusion time should have any connection with the mean residence time for steady-state dissolution, and why it should be related to the mean residence time for Macedo's laboratory experiments, for which Equation (6) was derived. It is not valid to adopt estimates of T_r based on exterior-field diffusion mechanisms to use in adapting correlations of laboratory data which represent dissolution mechanisms not affected by exterior-field diffusion. Different phenomena are involved, and the repository analogue is postulated without demonstrating its causal connection to the laboratory experiments.

The fallacy of the postulated analogue can also be demonstrated by comparing the results predicted by the technique of Macedo et al. with results predicted by Chambre's Equation (2), which is exact for steady-state dissolution at no flow and without decay. Macedo et al. state that, by using the diffusion estimate for T_r , Equation (6) will predict dissolution rates in a repository when convective effects on dissolution are negligible. In the absence of convection, there can be no finite flow through a fractured waste solid, so Macedo's Equations (6) and (7), derived for steady state dissolution, should agree with the exact steady-state solution in Equation (2). However, Macedo's incorrect repository analogue and his unjustified assumption of a diffusion-limited equivalent residence time introduce the sorption retardation coefficient K , even though sorption cannot affect steady-state dissolution of long-lived species. He fails to predict a functional dependence on rock porosity, which is shown in Equation (2) to be an important parameter in affecting dissolution rate. He incorrectly predicts zero dissolution rate when there is no void water in the waste package, although as explained above (II C.5) water in waste package voids and in the borehole annulus has no effect on the steady-state dissolution rate. Macedo's equations fail to predict the much greater transient dissolution rates that are shown by Chambre's exact solutions to occur over hundreds and thousands of years in a low-flow repository. Neglecting rock porosity and transient diffusion-controlled dissolution results in nonconservative estimates of dissolution rate.

As concluded by the WISP panel⁴, such empirical techniques are useful to correlate laboratory leach data, but postulating equivalent values of S/V ,

volume flow rate per waste package, and T_r in attempting to use these correlations to predict performance in a wet-rock repository is neither valid nor necessary. Predictive reliability is lost by such postulates. Proper mechanistic theories of repository performance exist, and these theories specify the kind of laboratory data, such as saturation concentrations, that are needed for valid and reliable predictions of waste dissolution rates.

3. Data on natural analogues. Macedo et al.³¹ base their conclusion that solid-liquid reaction rates control dissolution in a repository on a limited number of observations by Berner³⁴, who studied the dissolution rates of isolated grains of low-solubility minerals surrounded by a wet porous solid. By observing the temperature dependence of the dissolution rate, Berner concluded that dissolution was controlled by exterior-field diffusion for some mineral grains and by solid-liquid reaction rate for others. Ranking the few samples according to their solubility, he found that the dissolution of most of the low solubility grains was controlled by solid-liquid reaction rate. The observation was empirical and was limited to a small number of mineral samples. It does not justify the unqualified conclusion by Macedo et al.³¹ that different materials, e.g., borosilicate glass, and enormously larger solid forms will follow the ranking observed by Berner.

Better insight into the fallacy of generalizing and extrapolating from Berner's data is provided by the analytical solution of Zavoshy et al.¹⁰ for dissolution from a solid sphere of radius R surrounded by a saturated sorbing porous medium. The solid-liquid reaction rate, expressed by a simple first-order reaction dependent on the concentration of solute in the liquid at the solid surface, is used as a dissolution-flux boundary condition to connect with the mathematical analysis of exterior-field diffusion in the absence of convection. The analytical solution for the time-dependent dissolution rate contains a term ψ , the magnitude of which determines which phenomenon controls dissolution rate at steady state, where:

$$\psi = \frac{\text{forward reaction rate per unit area at } R}{\text{steady-state diffusive mass transfer rate at } R} = \frac{kR}{\epsilon D} \quad (8)$$

where k is the forward reaction rate constant. When ψ is much larger than unity, steady-state dissolution is controlled by exterior-field diffusion; when ψ is much less than unity, solid-liquid reaction rate controls. Inferring k from early-time leach data for silica from borosilicate glass, assuming a waste sphere 0.44 m in radius, and with $D = 7.7 \times 10^{-2} \text{ m}^2/\text{yr}$ for silica acid at 90°C and $\epsilon = 0.01$, we calculate $\psi(\text{SiO}_2) = 1240$. For this large glass sphere, silica dissolution is controlled by exterior-field diffusion.

If we make the sphere radius small enough, Equation (8) will predict a small ψ and solid-liquid reaction rate will control. This is what one would expect from the physics of the problem. We know of no causal effect of curvature on the solid-liquid reaction rate, but the high curvature of a small-radius sphere promotes more rapid exterior-field diffusion and can eliminate it as a controlling phenomenon.

Equation (7) demonstrates that it is not valid to apply Berner's

conclusions on small mineral grains to large waste solids.

The only physico-chemical property of the solid contained in Equation (7) is the forward reaction rate constant k . The theory shows that the dissolution rate of Berner's small mineral grains should have been ranked according to k , if it were known, instead of solubility. The ranking according to solubility does not demonstrate a casual effect of solubility on first-order dissolution and should not be generalized. Berner observes that the solid-liquid reaction is usually complex, and a higher-order reaction could result in the observed ranking.

There is no valid basis for the conclusion by Macedo et al. that the dissolution rate of nuclear waste in a repository would be expected to be controlled by surface reaction mechanisms. Based on the foregoing analysis, and as demonstrated in Table I, we conclude that for borosilicate glass the dissolution rate of silica and other low-solubility species in borosilicate glass waste will be controlled by exterior-field mass transfer and that solid-liquid reaction rate will not influence the dissolution rate except during the very early time of exposure to groundwater. This early time is no more than a few days if the solid-liquid reaction rate is given by the parameters adopted by Zavoshy et al.¹⁰.

4. Flow of ground water through fractured waste. In explaining his proposed model for predicting waste dissolution rate in a repository, Macedo^{31,32} states that his model considers ground water flowing through a fractured waste solid, whereas the mass-transfer analytical solutions presented by Chambre' assume an impermeable waste solid. Glass waste will be internally fractured from thermal stress. Water is likely to penetrate into fractured glass, but it will not alter the results of Chambre's mass transfer analysis if there is no net through flow of liquid through the waste. Solid-liquid reactions on internal surfaces will only increase the net solid-liquid reaction rate, which is already sufficiently rapid to maintain near-saturation concentrations of the low-solubility constituents in surface liquid in a repository environment.

Net through flow of ground water through the fractured waste is not included in the present mass-transfer analyses by Chambre', but it can be added. Because only a portion of the ground water flow can permeate the fractured waste, parameters appearing in the resulting mass transfer analysis must include the hydrodynamic permeabilities and porosities of the waste solid, backfill, and rock. Mass transfer from waste particles to through-flowing liquid will introduce dimensions of waste fragments and flow interstices, in addition to the other parameters already appearing in the mass-transfer analysis. None of these additional parameters appear in Macedo's proposed method of predicting waste dissolution rate in a repository because Macedo assumes that all ground water flowing through rock of cross-sectional area equal to that of the waste solid will flow through the fractured waste, and he assumes that this permeating ground water is well stirred with powdered waste, as in his laboratory experiments. Therefore, the effect of any finite flow of ground water through fractured waste must rest on a more realistic and mechanistic analysis and cannot be predicted by the

postulates of Macedo et al. The fact that Macedo's experiments include well-mixed flow through powder samples does not necessarily mean that the same flow and dissolution process will occur in repository waste.

Theoretical studies of the hydrodynamics and mass transfer in two-region porous media are underway by Chambre', and extension to include the effects of flow through waste can be considered.

IV. SUMMARY AND CONCLUSIONS

Predicting rates that radionuclides are released from waste packages cannot rest upon empirical long-term extrapolations of laboratory leach data. Reliable predictions can be based upon simplified assumptions, such as solubility-limited bulk-flow, if the assumed parameters are reliably known or defensibly conservative, but assuming volumetric flow rates through a waste-package cross section is arbitrary and can be nonconservative.

Wherever possible, performance analysis should proceed beyond simple bounding calculations to obtain more realistic--and usually more favorable--estimates of expected performance. Desire for greater realism must be balanced against increasing uncertainties in prediction and loss of reliability. Theoretical predictions of release rate based on mass-transfer analysis are bounding, and the well-established theory is well adapted to verification. The results from the exact analytical solutions can be used to test predictions from numerical techniques and from less mechanistic analogues.

Lower release rates are expected if less than complete failure of waste containers is considered, but data for reliable quantitative predictions are not yet available and will be difficult to obtain. Diffusive transport through small holes and cracks can be much greater than incorrectly predicted on the basis of area proportionality.

Repository-average release rates, taking into account statistical distribution of container failures, can be lower than individual-package release rates for some radionuclides and greater for others, depending upon mean-time to failure and the probability distribution of failures. Data are not yet sufficient for reliable prediction and will be difficult to obtain.

Several efforts to predict waste-package release rates in a repository, utilizing empirical correlations of laboratory leach-rate data, have invoked postulates of repository analogues to simulate the laboratory leach experiments. The postulated analogues are unrealistic, they introduce fictitious repository parameters, such as volume and volumetric flow rate of ground water associated with each waste package and ground water residence time, which are assigned arbitrary values for making predictions. They invoke functional dependence on parameters inconsistent with well-established mass-transfer theory, and they incorrectly assume that the dissolution mechanisms that control release rates observed in laboratory experiments are controlling or important in the repository.

The most useful experimental results from laboratory leach experiments are the saturation concentrations of radioelements released from the waste. Other parameters needed for reliable estimates of release rates in a repository can be directly measured, including rock and backfill porosity, diffusion coefficients, sorption, and ground water pore velocity upstream of the waste.

Effects on release rate due to colloids, radiolysis, possible flow through backfill and fractured waste, and grain-boundary diffusion and interbed flows in salt need to be resolved by theory and experiment.

V. ACKNOWLEDGMENT

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To: Robert E. Browning

MS. 62355



inter-office memorandum

TO: PACG Members

DATE: Sept. 12, 1985

FROM: Larry Rickertsen, Weston

SUBJECT: Performance Assessment Glossaries

W. O. No.:

At the PACG meeting of August 29, 1985, it was noted that the NRC will be very concerned over definitions of terms in their reviews of performance assessment plans and activities in the program. Because not all performance assessment terminology has yet been specified in the program, Weston was assigned to review the existing glossaries at the projects and those in program and NRC documents to identify potential issues.

The attached package summarizes the results of this brief review. This package identifies several areas requiring PACG consideration of performance assessment terminology. It is also noted that glossaries are being contemplated for the Regulatory Compliance Plan, the Waste Acceptance Preliminary Specification and the revision to 10 CFR 60 as well as the SC2 that could benefit from such consideration. The PACG should review the enclosed package and be prepared to discuss the recommendations in a conference call to be held in the latter part of the 3rd week of September. Arrangements for this call will be made with PACG members early in that week.

In addition the PACG members should be prepared to discuss the needs for the upcoming meeting with the NRC on Performance Allocation should advance material from the NRC be available.

PERFORMANCE ASSESSMENT TERMINOLOGY ISSUES

This package contains material to help identify issues that may exist with performance assessment terminology and definitions. It has been prepared in response to an assignment in the Performance Assessment Coordinating Group meeting on August 29, 1985 with regard to NRC's concern over DOE's usage of terms in written performance assessment plans.

This package includes the three glossaries from the EAs prepared by NNWSI, SRPO and BWIPO. While these glossaries are intended to address only the needs of the EAs, they are, nevertheless, quite comprehensive. Further, although the glossaries are somewhat site-specific, they are largely consistent with one another. The BWIP glossary is the most complete.

There are some minor inconsistencies and gaps in these glossaries with regard to performance assessment terminology. For example, the term "biosphere" is not defined at all in the NNWSI glossary, defined as "the surface portion of the accessible environment" by SRPO, and somewhat more generally by BWIP. Neither the SRPO nor the BWIP definition is precisely the same as that given in the Mission Plan or in the Generic Requirements Document (GRD). This inconsistency is not very important. It has no implication for regulatory performance objectives and would not impact any of the biosphere transport analyses; however, it would be a simple matter to develop a general definition that could be used by all projects. It is recommended that the SRPO definition be combined with the BWIP definition and that this consistent definition be used throughout this program.

Another example is in the definition of "brine migration". NNWSI defines this process as "the movement of brine inclusions in salt", BWIP defines it more narrowly as "movement of brine inclusions in salt toward a heat source", while the salt project defines it simply as "the movement of brine in salt". None of these is quite the same as the definition in the Mission Plan which gives it as "the movement of brine through interstices in rock". It is recommended that this term be reviewed by the PACG, so that potential confusion with regard to brine migration processes can be prevented.

An example of a gap in the glossaries is the term "packing" or "packing material" that identifies any material placed between the container and the host rock in the emplacement hole. This term is important because it may have a bearing on the evaluations of the engineered barrier system performance objectives. It is recommended that this term be added to the projects glossaries. This recommendation will be discussed more fully below.

There are probably other minor inconsistencies and gaps in the projects' glossaries and it is recommended that the glossaries be reviewed from the point of view of consistency and completeness regarding performance assessment and other terminology.

Meanwhile, there are several issues regarding terminology important to performance assessment which result from evolution or ambiguity in the program. Some of these issues are discussed below.

1. Benchmarking

In its review of the SRPO Performance Assessment Plan, the NRC noted problems in use of terms such as "disturbed zone", "benchmarking", and "verification". The disturbed zone is discussed below (see Issue 6 below). The definition of benchmarking given by the NRC in the draft Generic Technical Position (GTP) on Licensing Assessment Methodology for High-Level Waste Geologic Repositories is as follows:

"Benchmarking: The process of establishing that a computer code will perform numerical calculations that agree with appropriate analytic solutions (see verification); that the numerical solutions of the code adequately represent the range of physical situations to which the code is likely to be applied (see validation); and that a new code can reproduce results of a previously qualified code to an acceptable level of precision."

The Department of Energy is generally in agreement with the definitions of verification and validation given by the NRC (see the project glossaries) but has generally used only the last clause to define benchmarking. The BWIP definition from the glossary is;

"Benchmarking of Computer Codes: code-to-code comparison in which simulations obtained with the U.S. Department of Energy codes are compared to those obtained with other available codes. The test cases used for benchmarking will use data representative of the actual repository setting. Benchmarking is complete when a reasonable consensus between independent code predictions is achieved."

Because this definition is encompassed by that given in the GTP, would not cause any confusion, and is generally accepted in the program, it is recommended that this BWIP definition be used throughout the program. It is also recommended that the definition of verification and validation as given in the GTP be used in the program. A fourth term which is related to these is "certification". According to the GTP, certification is "assurance that the actual version of a code used to perform a particular analysis is the same as the formally documented version." It is recommended that this definition also be adopted. (It is noted that this definition is somewhat different than the meaning of the word in QA applications as given in the SRPO glossary.)

2. Complementary Cumulative Distribution Function (CCDF)

Although the CCDF is well-defined mathematically, there is potential confusion in the construction of the CCDF with regard to the roles of uncertainty, scenario probability, and risk. The relationship between scenario probability and parameter uncertainty and their role in defining the CCDF has not yet been determined. It is recommended that this role be reviewed by the PACG in order to determine a clearer definition of the CCDF.

With regard to risk, the GTP defines this term as "a measure of the probability and severity of adverse effects (consequences); the expected detriment per unit time to a person or population from a given cause". The first clause in this definition is essentially correct although it can be made more specific for repository performance assessments. The second clause is not accurate since it confuses a rate with risk (which may be expressed as a rate). It is recommended that the program adopt the following definition:

"risk - the product of the probability and consequence of a set of processes and/or events".

3. Waste Package and Engineered Barrier Systems

Some evolution in component and system definitions has occurred in the design program. It is recommended that the following terminology be used:

"waste form - the radioactive waste material and any encapsulating or stabilizing matrix."

"Canister - the metal vessel into which the waste form is placed."

"Container - the metal vessel placed around the canister to meet the 10 CFR 60 containment requirement."

"Packing - the material placed between the container and the host rock wall of the emplacement hole."

"Waste Package - the waste form, canister, any container, and any packing."

"Disposal Package - the waste package that is emplaced in the underground facility."

"Engineered Barrier System - the waste package and any other manmade components of the underground facility designed to restrict movement of water and to limit release of radionuclides into the geologic medium. It includes any liners, seals, grouts, bulkheads, or backfill placed within the underground facility, but does not include any of the host rock itself except where grouted or sealed."

In this context, "overpack" would no longer be used to describe a component of the system. In addition it is noted that these definitions differ in minor ways from those in the GRD, the Mission Plan, 10 CFR 60, and the GTP, as well as those in the projects' glossaries. As a result it will be necessary to get concurrence regarding these terms.

It is also noted that the GTP calls for calculation of waste package containment time at the boundary of the waste package, while the stated intention of DOE is to evaluate this time at the boundary of

the container. Further, the GTP indicates that the maximum radionuclide release rate will be measured at the boundary of the engineered barrier system, while DOE intends to predict this rate using tested models.

4. Radionuclide Release Rate from the Engineered Barrier System

This term has been clarified in the letter from Robert E. Browning of the NRC to William Bennett of the DOE (September 10, 1984). Evaluations of the system with regard to this performance objectives should reference this letter.

5. Substantially Complete Containment

Two issues need to be resolved: (a) the interpretation of the containment requirement and (b) the interpretation of the term "substantially complete". With regard to the first issue the Waste Package Coordination Group has determined that the design objective for the container is that the container lifetime will be sufficient that the containment requirement is met. It may be possible to demonstrate that radionuclides are still contained within the waste package system even after the container has breached. It is recommended that the containment requirement and the approach to evaluation of the waste package with regard to this requirement be reviewed by the PACG. In this regard, it should be noted that the required time before loss of containment will be a period specified by the NRC (based on the information provided by the DOE) and that the specification of this period will influence the evaluation of the rate of radionuclide release from the engineered barrier system.

With regard to the second issue, a quantitative interpretation of the requirement has not yet been determined. One interpretation is that "substantially complete containment" is obtained if it can be demonstrated with reasonable assurance that the containment requirement is met with a level of confidence of 90 percent. It is recommended that the PACG review this situation to determine if a position on this requirement can be made at the present time and, if so, what that position should be.

Pre-emplacement Ground-Water Travel Time

This performance objective has also received some clarification in a letter from the NRC to DOE (letter from Robert Browning to Ralph Stein, June 12, 1985) and it is anticipated that further clarification will be made with regard to the meaning of "fastest path of likely radionuclide travel" in a future technical position paper. There are two other issues with regard to this performance objective: (a) definition of the boundaries of the accessible environment and the controlled area and (b) definition of the disturbed zone.

(a) Definition of the Boundary of the Accessible Environment.

With respect to Issue (a), the accessible environment boundary definition in 10 CFR 60 refers to the controlled area which is specified as being "10 kilometers in any direction from the outer boundary of the underground facility." The definition of the controlled area given by the EPA is "(1) a surface location to be identified by passive institutional controls, that encompasses no more than 100 square kilometers and extends horizontally no more than five kilometers in any direction from the outer boundary of the original location of the radioactive wastes in a disposal system; (2) the subsurface underlying such a surface location."

While the definition of the controlled area specified by the NRC need not correspond to the EPA definition, the intention of the NRC was that the travel time performance objective and EPA's standard for cumulative release to the accessible environment would be consistent. Therefore, it is recommended that DOE adopt the EPA definition of the controlled area for the purposes of evaluating the pre-emplacement ground-water travel time.

(b) Definition of Disturbed Zone

It has been argued that the disturbed zone cannot be defined until site-specific data are obtained during detailed site characterization studies. Nevertheless the lack of definition of this zone has provided a source of controversy regarding the travel time evaluations being conducted for site nomination and recommendation. At the same time there appears to be no reason for this controversy. For example, the salt sites were evaluated and a disturbed zone extending no more than 10 meters into the host rock was determined based upon preliminary, but very conservative, evaluations. These evaluations are described in Appendix 6A of the salt EAs. This appendix from the Deaf Smith County EA is attached. It considers various interpretations of the NRC definition of the disturbed zone and it gives simple analyses for disturbances to the thermal, mechanical, fluid, chemical, and radiation environments.

There does not seem to be any good reason that similar analyses cannot be conducted for other sites as well. A very good case can be made for the following definition:

"The disturbed zone is defined as a zone within the boundaries defined by the farthest extent of the boiling isotherm or a distance one room diameter into the host rock, whichever provides the largest zone."

This definition is based upon the fact that buoyancy-type considerations for the groundwater are predictable since the density and viscosity properties of the water are known, that few, if any, other thermally-induced disturbances are significant below the boiling point, that radiation effects

extend only a small distance, and that local mechanical disturbances are insignificant more than one room diameter away from the excavation. When the results of testing become available, it may be possible to define even a smaller disturbed zone, if desired. It is recommended that the PACG review this definition and determine if it is applicable to the site prior to full characterization.

7. Far Field, Near Field, and Very Near Field

The NRC indicated in its review of the SRPO Performance Assessment Plan a concern that these terms are used to define subsystems apart from the subsystem definitions specified in 10 CFR 60. The far field is defined in the GTP as "the portion of the geologic setting that lies between the outer edge of the disturbed zone and the accessible environment". The SRPO glossary defines the far field as "the geosphere, hydrosphere, and biosphere outside the thermally influenced area of a repository". These definitions could be quite different depending upon the criteria defining "thermally influenced area" and "disturbed zone". The SRPO definition of the near field is essentially the repository, the host rock and the engineered barrier system while the very near field appears to correspond to the waste package system.

There does not appear to be a strong reason to provide detailed definitions for these terms since there are no regulatory performance objectives for these regimes. Indeed, the terms are intended largely to indicate requirements for particular phenomena or environments, or the range for boundary conditions for evaluating these effects. Since the range for thermal changes may be quite different than for mechanical effects or fluid effects, it may not be meaningful to be very specific without reference to particular processes. Therefore it is recommended that no detailed definitions be given in the glossary. In addition it is recommended that DOE acknowledge NRC's concern and that these terms not be used to define systems for analyses.

8. Important to Safety

The NRC gives the following definition in 10 CFR 60:

"Important to safety with reference to structures, systems, and components means those engineered structures, systems, and components essential to the prevention or mitigation of an accident that could result in a radiation dose to the whole body, or any organ, of 0.5 rem or greater at or beyond the nearest boundary of the unrestricted area at any time until the completion of permanent closure.

While this definition is explicit and therefore useful, it provides an unreasonable requirement on the system with respect to very low probability events. It is recommended that the definition be modified for these latter cases. For example, accidents which are not credible (e.g. with a frequency of $10^{-6}/\text{yr}$ or less) should not be considered at all in the analysis. In addition, the risk

from accidents of low probability (e.g. those that have less than one chance in 100 of occurring during the preclosure period) should be no greater than those with greater probability. It is recommended that the PACG review this definition to determine if an acceptable criterion can be developed.

9. As Low as Reasonably Achievable (ALARA)

An approach to ALARA must be developed for the preclosure system. In general this principle means that the sufficient constraints are included in the design that preclosure occupational and public exposures are as low as reasonably achievable taking into account the state of technology, the costs in relation to the benefits to public health and safety, and other considerations. Criteria to assure releases are ALARA at DOE facilities are given in DOE Order 5480. Whether additional criteria will be used must yet be determined. It is recommended that the PACG review these criteria to determine if the ALARA requirement is adequately addressed for the preclosure repository system.

10. Performance Criteria

Performance assessment plans call for the specification of "performance criteria" which may be confusing because the regulations refer to "performance objectives" and "siting criteria". It is recommended that the following definitions be used in the performance assessment program.

"Performance Objectives - the requirements for repository performance specified in 10 CFR 60, Sections 111 through 113. These include the requirements of 10 CFR 20 for the preclosure system, the EPA standards for system performance in 40 CFR 191, the pre-emplacement ground-water travel time requirement, the requirement for containment of high-level waste within the waste package, and the limit to the rate of release of radionuclides from the engineered barrier system".

"Performance Criteria - rules developed within the program by which the performance of the repository system can be judged. These include the regulatory performance objectives, but also include other rules or standards developed by DOE in the course of performance assessment. These latter criteria are not fixed and may be changed to suit the needs for assessment of the system. Examples of these latter criteria might include a requirement on the lifetime of the container, a limit to the release of rate of release from the waste package, or thermal criteria established for components of the system".

"Performance Measure - a variable for which a performance criterion is set; e.g. waste package lifetime, rate of release of radionuclides from an element of the system, cumulative release of radionuclides."

"Assessment Criteria - see 'Performance Criteria'."

"System Criteria - see 'Performance Criteria'; usually used in the context of the preclosure system."

"Performance Goals - see 'Performance Criteria'."


"Design Goal - a rule set by designers for an engineered component of the system and usually based upon performance criteria for the component but may include additional design margin to account for manufacturing or parameter uncertainties".

"Performance Allocation - the process of developing subsidiary performance criteria for subsystems (or components) to assure that system (or subsystem) performance criteria are met with reasonable assurance".

"Reliability Goal - a performance criterion set for an element of the system in terms of the level of confidence that the component will meet a system performance criterion; e.g. a goal for the confidence level that the waste package subsystem alone will meet the EPA standard for cumulative release to the accessible environment or a goal for the confidence level that the container will meet the containment requirement for the entire waste package."

11. Conceptual Model

This term is used in a variety of ways in the program and may be a source of confusion. In the GTP this term is defined as "a pictorial and/or narrative description of a repository system or subsystem which relates all relevant components and structures contained within the system or subsystem, the interactions between components and structures, and any internal or external processes which affect the overall performance of the subsystem." This term is so general that it includes any description, picture, data or parameter representation, and any mathematical model for the system. In the GTP, in fact, the term conceptual model is applied in each of these ways. It is therefore difficult to interpret what is meant when performance assessment plans call for the specification or development of "conceptual models". Nevertheless, because there is no explicit regulatory obligation to provide a more definitive explanation of this term, it is recommended that no more specific definition be given.

20 Robert E. Browning MS 62355-13


Rockwell Hanford Operations
P.O. Box 800
Richland, WA 99352

Rockwell
International

October 11, 1985

In reply, refer to letter 28313.R1

O. L. Olson, Director
Basalt Waste Isolation Division
Department of Energy
Richland Operations Office
Richland, Washington 99352

Dear Mr. Olson:

RESPONSE TO INSTRUCTIONS FROM R. E. BROWNING, DIRECTOR,
DIVISION OF WASTE MANAGEMENT, NUCLEAR REGULATORY
COMMISSION, ON CLARIFICATION OF IODINE-129 ISSUES
(Contract DE-AC06-77RLO1030)

Rockwell Hanford Operations (Rockwell) was asked to prepare a response to the Browning (1985) letter for incorporation into the environmental assessment (EA) comment response document. That letter referenced two documents that the Nuclear Regulatory Commission (NRC) believes are important to the groundwater travel time issue addressed in the EA. The reports identified were:

Brauer, F. P. and H. G. Rieck, Jr., 1973. "I(129), Co(60), and Ru(106) Measurements on Water Samples from the Hanford Project Environs," Battelle, Pacific Northwest Laboratories, Richland, Washington, 36 p.

Brauer, F. P. and K. M. McFadden, 1975. "I(129), Co(60), and Ru(106) Measurements on Water Samples from the Hanford Project Environs: 1962-1974," Battelle, Pacific Northwest Laboratories, Richland, Washington, 26 p. (plus data appendices of 74 pages).

A Brauer and Rieck (1973) report was issued in 1973 as BNWL-SA-4487. It is assumed that this report is the same Brauer and Rieck (1973) document identified in the Browning (1985) letter (Browning showed the report as having 36 pages while the actual report contains 38 pages). Does Browning have a draft or final copy of BNWL-SA-4487? Brauer and Rieck (1973) basically describes analytical and groundwater sampling techniques. Data discussion is mostly generic and emphasized radionuclide recoveries from different ion-exchange methods. The actual



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well and groundwater sample identifications along with analytical results were later detailed in Brauer and McFadden (1975). While the Brauer and Rieck (1973) report can be easily incorporated into the basalt EA, the Brauer and McFadden (1975) cannot without Department of Energy-Richland Operations Office (DOE-RL) clearance. Rockwell recommends that DOE-RL work with Pacific Northwest Laboratory (PNL) and proceed in the release of Brauer and McFadden (1975).

Rockwell also recommends that DOE-RL request PNL to prepare a summary document concerning the current knowledge of iodine-129 distribution in groundwaters on the Hanford Site and in surrounding areas. If DOE-RL accepts this recommendation, then Rockwell will provide a detailed specification to PNL to enable them to provide a document that will support future site characterization planning. In the meantime, Rockwell defense waste management is reviewing their files for any information pertaining to iodine-129 measurements made on groundwaters sampled from basalt aquifers. They will document any such data relevant to waste management activities in accordance with DOE-RL public release policy.

The Browning (1985) letter has been logged into the official EA comment matrix and will be included in the comment response portion of the final EA.

Assuming that the above noted iodine-129 data are publicly released, the following type of writeup is planned for inclusion in the final EA. It could be inserted into Section 3.3.2.

"Iodine-129 and tritium have been detected in confined groundwater zones in the Saddle Mountain basalt beneath the Hanford Site. Two areas have above background concentrations of iodine-129. These are in the vicinity of West Lake and Gable Mountain Pond and at one borehole, DB-7, located approximately 20 kilometers (12 miles) to the southeast near the Yakima River."



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"In the West Lake - Gable Mountain Pond area, the basalts were uplifted along the eastern extension of the Umtanum Ridge-Gable Mountain anticline and then eroded by post-glacial flood waters and the ancestral Columbia River (Ledgerwood and Deju, 1976; Graham et al., 1984). Hydraulic intercommunication now exists between the upper confined and unconfined aquifers in this area. Because waste waters from chemical processing plants are discharged into ponds near the 200 East Area on the Hanford Site, hydraulic heads in the unconfined aquifer near these discharge areas have exceeded those in the shallow basalts. This has created a hydraulic driving force for transporting low-level contaminated water from the unconfined aquifer into the uppermost basalt aquifer(s) (Gephart, et al., 1976; Graham et al., 1984). The presence of iodine-129 and tritium in the Saddle Mountains Basalt is thought to result from this exchange. Reported concentrations of iodine-129 in the Rattlesnake Ridge interbed (Figure 3-6) range from near the detection limit of 4×10^{-6} picocuries per liter to a maximum of 4×10^{-2} picocuries per liter near liquid waste disposal sites (Graham et al., 1984; Strait and Moore, 1982; Gephart et al., 1976)."

"At borehole DB-7 near the horn of the Yakima River, iodine-129 in the Mabton interbed was detected at concentrations of approximately 3×10^{-4} picocuries per liter. Data reported by Brauer and McFadden (1975) indicate that this concentration is higher than at other groundwater sampling points away from waste disposal areas. The analytical and groundwater sampling techniques used by Brauer and McFadden (1975) are described in Brauer and Rieck (1973). However, data given in Early et al. (1985), show the absence of tritium (less than 0.1 tritium units) in any wells monitoring the Mabton interbed outside the 200 Areas, including borehole DB-7. This implies that the source of slightly elevated iodine-129 concentrations in borehole DB-7 could not be the result of aquifer transport originating from either precipitation or subsurface movement from radioactive liquid waste disposal sites farther north. The source of iodine-129 in borehole DB-7 is unknown and will be addressed by the Department of Energy (DOE). Studies are underway to examine the structural integrity of borehole DB-7 which may influence the quality of water samples taken."



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"Brauer and McFadden (1975) reported iodine-129 concentrations of 6×10^{-5} picocuries per liter in the Columbia River and 2×10^{-2} to 8×10^{-3} picocuries per liter in Hanford 300 Area rain water. Price et al. (1985), reported that iodine-129 concentrations in the Columbia River in 1984 ranged from 1.2×10^{-5} picocuries per liter upstream from Hanford to 7.4×10^{-5} picocuries per liter downstream from Hanford. The DOE concentration guideline for iodine-129 is 60 picocuries per liter. The U.S. Environmental Protection Agency drinking water standard is 1.0 picocurie per liter (EPA 1976)."

Very truly yours,

L. R. Fitch, Acting Director
Basalt Waste Isolation Project

LRL/RMS/abj

cc: J. H. Antonnen - DOE-RL
P. E. Rasmussen - DOE-RL
J. J. Sutey - DOE-RL

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