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Office of Inspection and Enforcement

REVIEW OF EPA PLUME STUDY AT MONTICELLO

As you requested in your memo dated March 4, 1976, we have reviewed the EPA draft report "Air Pathway Exposure Model Validation Study at the Monticello Nuclear Generating Plant." Our comments are attached.

M

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Task No: N/A

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Comments of Environmental Standards Branch,

Office of Standards Development

on

EPA Draft Report, "Air Pathway Exposure Model Validation  
Study at the Monticello Nuclear Generating Plant."

1. The Introduction includes a lengthy discussion of proposed rules changes, the function of EPA and NRC, etc. This discussion is irrelevant to the paper, which is a comparison of models and field measurements. We suggest that the introduction consist of a short statement to the effect that environmental monitoring programs require the use of models and measurements which are reliable down to exposures of a few milliroentgen per year. As a minimum, the Introduction should be rewritten to reflect the final Appendix I, since the proposed rules described in the Introduction are now obsolete.
2. The last sentence on page 2 refers to data provided according to Regulatory Guide 1.21. We suggest the Introduction be more specific on the type and format of data used, since (1) not all reactors follow Regulatory Guide 1.21, (2) the average reader might not be familiar with the details of the guide, and (3) there may be different interpretations as to what Regulatory Guide 1.21 requests.
3. The first paragraph of section V-B should clearly state that gamma exposure rates and concentrations of Xe-133 were predicted by the

models. The average reader might get the idea that other things such as beta doses, whole body doses, or inhalation doses are being calculated, because (1) the Introduction discusses Appendix I requirements, (2) one model is named AIREM, and (3) on pages 16 and 20 the abbreviation for roentgen is incorrect.

4. Page 3, last paragraph - It should be stated whether all radiiodines were excluded with particulates.
5. Page 8, last paragraph - It should be clarified whether any radionuclides were excluded from the input to the models. This paragraph raises the question as to whether minor radionuclides were ignored.
6. Page 20, line 3 and line 14 - Appendix I does not contain limits. It specifies design objectives.
7. Page 20, last line - The meaning of "estimate extreme violations of Appendix I Guides" is unclear. We suggest this phrase be changed to "detect conditions where doses are substantially above design objectives given in Appendix I".