Protective Action Guides Manual

Transition to Recovery

Sara DeCair, US EPA

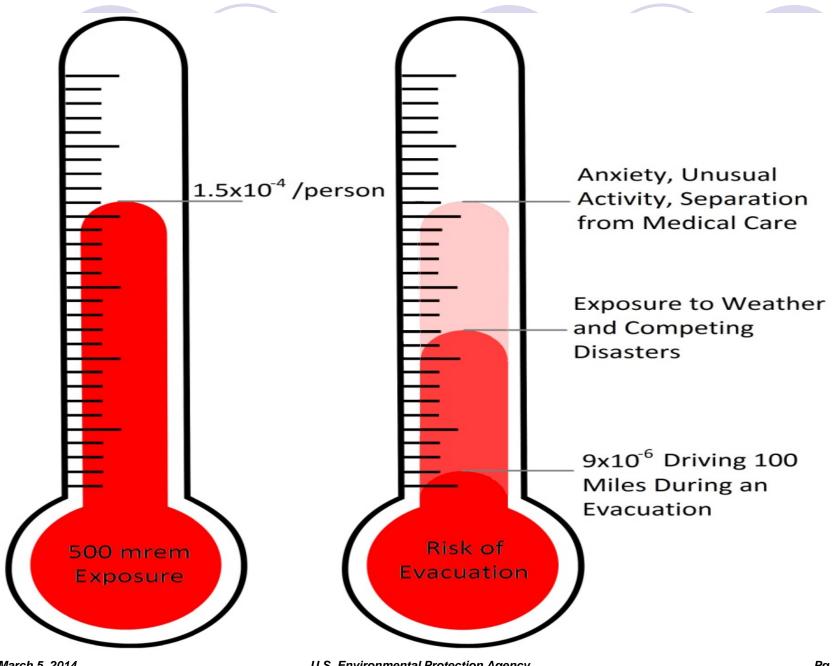
May 2014

Topics I'll Cover

- Basis for setting the Protective Action Guide (PAG) levels
- Reentry and reoccupancy: New guidance in 2013 PAG Manual
- Cleanup: PAG Manual describes a process, does not set levels

Basis for Setting the Evacuation PAG

- Assuming that 50% of the dose can be avoided by taking a protective action...
- Then the dose at which protective actions should be taken to protect the public from delayed health effects is:
 - 1 rem
- Extenuating circumstances (severe weather, secondary disasters, institutionalized people, etc.) may warrant using 5 rem or even 10 rem.

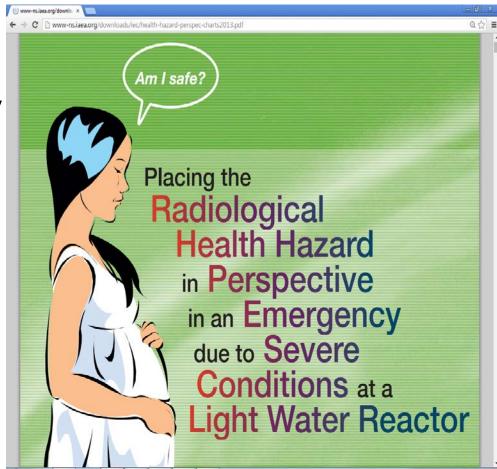


Basis for Setting the Evacuation PAG

- EPA considered the acceptable range of costs for avoiding a statistical death from pollutants other than radiation
- And using BEIR III risk of 3x10⁻⁴ cancer deaths per person-rem, that range equates to:
 - \$120 to \$2100/person-rem
- Evaluation of the costs associated with implementing various protective actions results in an upper bound of:
 - 1-10 rem with most values being 5 rem
- And a lower bound of
 - 0.15 to 0.8 rem with 0.5 rem being representative of most situations

Basis for PAG Levels: Sensitive subpopulations

- Special risk groups include fetuses, and persons who are not readily mobile...
- ...However, due to the difficulty of rapidly evacuating only pregnant women in a population, and the assumed higher-than-average risk associated with their evacuation, it is not considered appropriate to establish separate PAGs for pregnant women



Basis for Setting the Relocation PAG



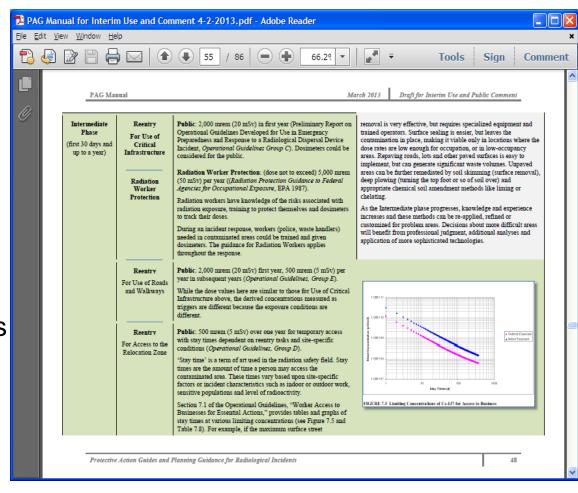
Considerations for selection of PAGs for the intermediate phase of a nuclear incident differ from early phase primarily with regard to implementation factors

Specifically, they differ with regard to cost of avoiding dose, the practicability of leaving infirm persons and prisoners in the restricted zone, and avoiding dose to fetuses

Although sheltering is not generally a suitable alternative to relocation, other alternatives (e.g., decontamination and shielding) are suitable

Re-entry: Going back in temporarily

- Public, workers reentering Relocation area to work during cleanup
- Basis: Relocation 2nd year PAG
- Detailed exposure scenarios in Operational Guidelines
- Do it yourself: RESRAD-RDD software



Reoccupancy during Cleanup Operations

- "Although it may take years to achieve the final cleanup goals for all land uses, reoccupancy of the affected area will be possible when interim cleanup can reduce short-term exposures to acceptable levels...
- "There may be institutional or engineering controls placed on some portions of the site to prevent excessive exposures until further active remediation, radioactive decay, or natural weathering allow the site to meet cleanup goals."

Late Phase: Cleanup Goal

- What is the community expectation of cleanup goal = background?
- Prescriptiveness versus flexibility
- Time, costs, risks, benefits
- Varied legal authorities and funding sources
 - Depends on the material
 - Terrorism or not
 - More than one legal authority may apply

Step-wise Process

Characterization and stabilization

- Establish cleanup goals based on options analysis
- Implementation and reoccupancy

Benchmarks as starting points

Regulation	Agency	Standard/Numerical limits ^b
General public (10 CFR 20)	NRC	100 mrem/year
Uranium mill tailings (40 CFR 192;	EPA	Ra-226/228: 5 pCi/g (surface)
10 CFR 40, App. A)		15 pCi/g (subsurface)
		Rn-222: 20 pCi/m ² -sec
High-level waste operations (10 CFR 60)	NRC	100 mrem/year
Low-level waste (10 CFR 61)	NRC	25/75/25 mrem/year
Drinking water (40 CFR 141.15-16)	EPA	Radium: 5 pCi/L
		Gross alpha: 15 pCi/L (excludes Ra and U)
		Beta/photon: 4 mrem/year ^c
		Uranium: 30 µg/L
Uranium fuel cycle (40 CFR 190)	EPA	25/75/25 mrem/year
Air emissions (National Emission Standards	EPA	10 mrem/year to nearest off-site receptor
for Hazardous Air Pollutants) (40 CFR 61, H)		
Superfund (CERCLA) cleanup (40 CFR 300)	EPA	A risk range of 1:10,000 to 1:1,000,000 (10 ⁻⁴ -
		10 ⁻⁶) excess lifetime risk of getting cancer or
		ARARs ^d
Decommissioning (10 CFR 20)	NRC	25/100/500 mrem/year
Occupational standards (29 CFR 1910;	OSHA;	5,000 mrem/year
10 CFR 20; 10 CFR 835)	NRC; DOE	

Decision-Making Organizations

- Focus on process for reaching consensus:
 - Decision Team might be requesting funding
 - Senior local, state and federal officials
 - Recovery Management Team
 - Senior leadership in the field recovery effort
 - Stakeholder Working Group
 - Community leaders, local businesses, nongovernmental representatives, members of the public
 - Technical Working Group
 - Select subject matter experts, communicators

Playing it out: Liberty RadEx

- Used Cleanup Advisory
 Forum process to
 prioritize cleanup
 activities and develop a
 long-term cleanup
 strategy
- Technical group
- Community group



Technical Advisory Panel



Thank you!