

Moab UMTRA Project 2nd Quarter 2024 Environmental Radiological Monitoring Report (April through June 2024)

Revision 3

November 2024



Office of Environmental Management

Moab UMTRA Project 2Q2024 Environmental Radiological Monitoring Report

Revision 3

Review and Approval

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Revision History

Revision	Date	Description
0	July 2024	Initial issue. Report for 1Q2024 with name revision from Environmental Air Monitoring to Environmental Radiological Monitoring. Begins
	,	permanent document number DOE-EM/GJRAC3130.
1	August 2024	Corrected errors in several calculations, reviewed entire document.
		Added explanation of why MEI locations were moved and
2	October 2024	Representative Person removed. Corrected values in Tables 2, 3, and 4.
		Corrected TED for CJ based on change in Table 4.
3	November 2024	2Q2024 Initial Report.

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Acronyms and Abbreviations

CJ Crescent Junction
DOE Department of Energy

KWRS Ken's Weather Reporting System

LCS laboratory control sample

LCSD laboratory control sample duplicate
MDC minimum detectable concentration
MEI maximally exposed individual
MESa Moab Environmental Sampling

met meteorology mrem millirem O Order

OSL optically stimulated luminescence

pCi picocurie

pCi/L picocurie per liter

RAC Remedial Action Contractor RRM residual radioactive material SAP sampling analysis plan

TAC Technical Assistance Contractor

TED total effective dose

UMTRA Uranium Mill Tailings Remedial Action

1.0 Introduction

The purpose of this Report is to present the results of environmental air and direct gamma monitoring at the U.S. Department of Energy (DOE) Moab Uranium Mill Tailings Remedial Action (UMTRA) Project sites during the first calendar quarter of 2024 (January-March). The Project sites consist of the former uranium ore-processing mill located three miles north of Moab, Utah, and the disposal site located near Crescent Junction, Utah.

2.0 Regulatory Requirements

This Report demonstrates compliance with DOE Order (O) 458.1, Admin Chg 4, "Radiation Protection of the Public and the Environment," which states DOE radiological activities must be conducted in a manner that does not cause total effective dose (TED) to the public to exceed 100 millirems (mrem) in a year, or an equivalent dose to the lens of the eye exceeding 1,500 mrem in a year, or an equivalent dose to the skin or extremities of 5,000 mrem in a year. For the Project, the TED is the sum of the direct gamma radiation (minus background) and radioactive particulate material (radioparticulate) exposure. This DOE limit excludes doses from background radiation, radon gas and its decay products in air, occupational doses, and medical exposures.

DOE O 458.1 also specifies releases of radioactive material to the atmosphere from DOE activities shall not exceed an annual average concentration of 3 picocuries per liter (pCi/L) of radon or its decay products, excluding background, at the site boundary.

Compliance with DOE O 458.1 is demonstrated by calculating the TED to the maximally exposed individual (MEI) or the representative person or group from the public likely to receive the highest radiation dose based on exposure pathways and parameters. The Project has established MEIs for the Moab and Crescent Junction (CJ) Project sites.

The MEI stations at both sites (Moab and CJ) were moved in the first quarter of 2024 to provide more accurate exposure data at the MEI locations. The new locations were chosen based on topography, prevailing wind direction, and other factors to enable a more accurate reflection of MEI total dose from direct gamma, radon and radioparticulates. The Representative Person (recreational biker) scenario for Moab was discontinued since the DOE Order requires monitoring only the MEI <u>or</u> Representative Person, not both.

3.0 Radiological Monitoring and Results

The Moab UMTRA Project monitors the following:

- Radon, using alpha-track detectors.
- direct gamma radiation, using optically stimulated luminescence (OSL) dosimeters; and
- radioparticulates, using air sampling equipment.

Off-site monitoring stations for the Moab site are shown on Figure 1. On-site Moab stations are shown on Figure 2. All monitoring stations for the Crescent Junction site are shown in Figure 3.

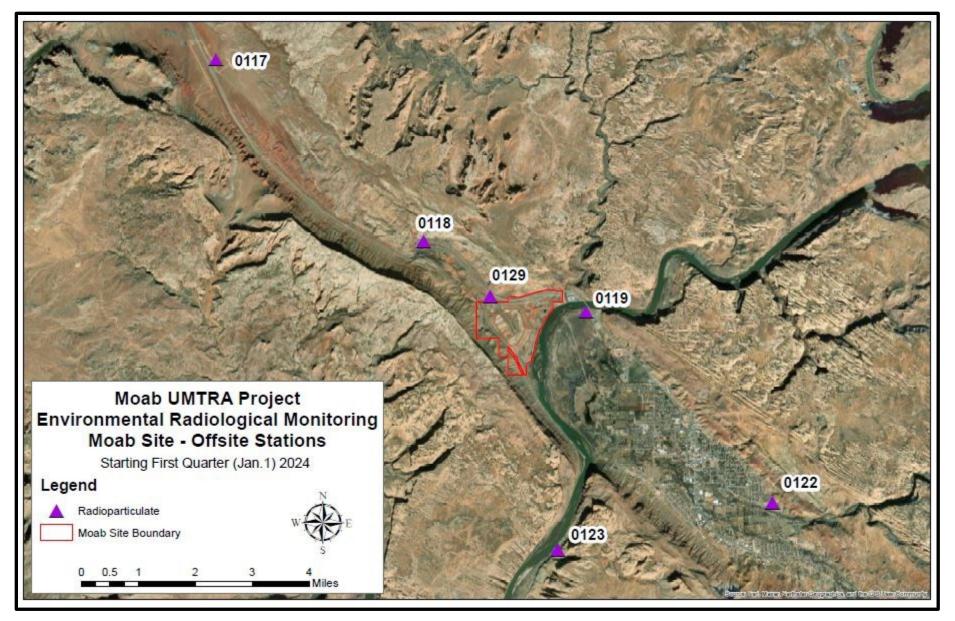


Figure 1. Moab Off-Site Individual Environmental Radiological Monitoring Locations

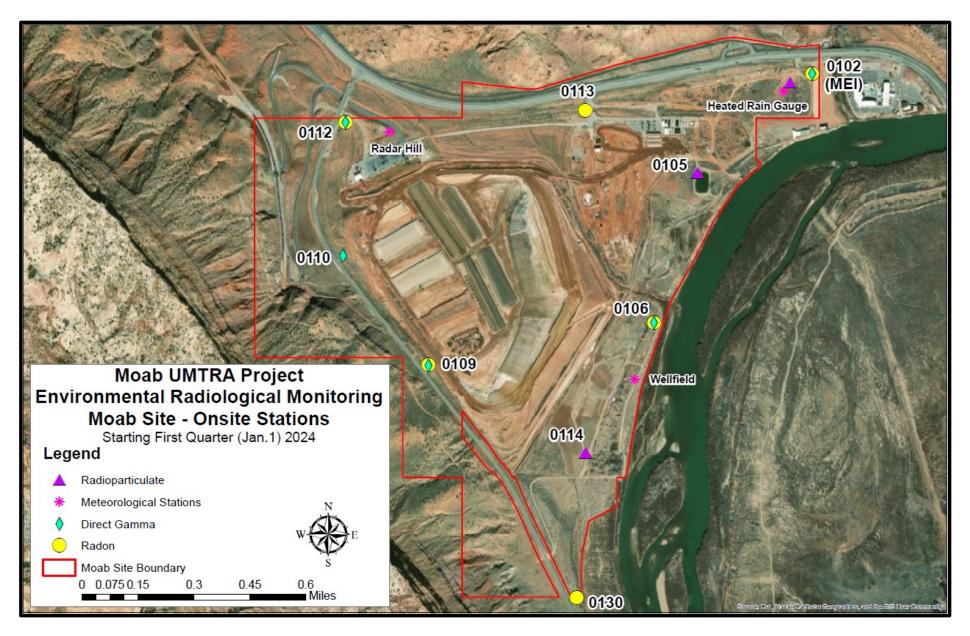


Figure 2. Moab On-Site Environmental Radiological Monitoring Locations

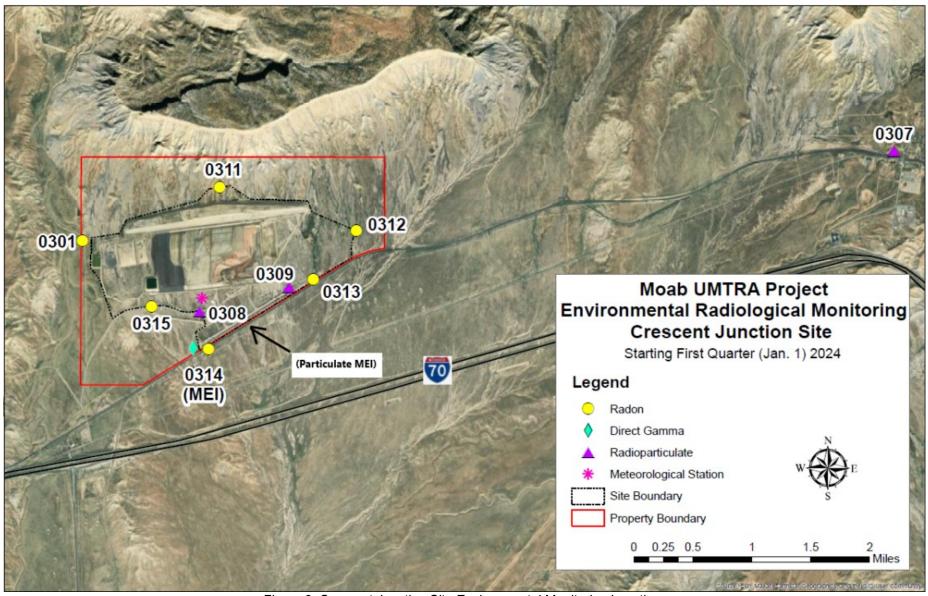


Figure 3. Crescent Junction Site Environmental Monitoring Locations

3.1 Radon

Radon is a radioactive, colorless, odorless, tasteless noble gas, which occurs naturally in minute quantities as an intermediate step in the normal radioactive decay chains through which thorium and uranium decay into various short-lived radioactive elements and lead. Radon is the immediate decay product of radium. The most stable isotope, Rn-222, has a half-life of only 3.8 days, making it one of the rarest elements. Since thorium and uranium are two of the most common radioactive elements on earth (including in the Moab project tailings) while also having three isotopes with half-lives on the order of several billion years, radon will be present on earth long into the future despite its short half-life. The decay of radon produces many other short-lived nuclides, known as "radon daughters", ending at stable isotopes of lead. As a noble gas radon does not stay in the lungs when breathed in, but it can produce a radiation dose to lung tissue while it is in the lungs when present in air we breathe.

The radon monitoring network consists of 12 total radon monitors along the site boundaries: 6 monitors at the Moab site and 6 monitors at the Crescent Junction site (DOE O 458.1 4f; Figures 2 and 3). Background radon for both the Moab and Crescent Junction project sites is 0.6 pCi/L.

Moab Site Results

Table 1 shows quarterly and average radon results for the past four quarters at the Moab site boundary. The background value of 0.6 pCi/L has been subtracted from the past four quarters average.

Table 1. Quarterly and Average Radon Concentrations for the Moab Site for the Past Four Quarters

Station Number	3rd Quarter 2023 (pCi/L)	4th Quarter 2023 (pCi/L)	1st Quarter 2024 (pCi/L)	2nd Quarter 2024 (pCi/L)	Past 4 Quarters Average (pCi/L) (Background subtracted)
0102 (MEI)	0.97 *Station 0118	3.2 *Station 0102	0.95 *Station 0102	0.59 *Station 0102	0.83
0130	0.97	2.4	1.0	0.89	0.72
0109	1.50	2.2	0.84	1.1	0.81
0112	1.1	2.4	0.78	0.81	0.67
0113	1.9	4.0	1.2	0.76	1.37
0106	2.1	7.4	2.6	1.4	2.78

^{*}MEI (Station 118) moved from Arches back to Station 102 during the third quarter of 2023.

The Project's measured annual average radon emission at the Moab site boundary is below the DOE limit of 3.0 pCi/L. The Project is compliant with DOE O 458.1 4F.

Crescent Junction Site

Table 2 shows quarterly and average radon results for the past four quarters at the Crescent Junction site boundary. Background value of 0.6 pCi/L has been subtracted from the average of the past four quarters.

Note: The Radon MEI will change from Station #0314 to Station #0308 starting Q4 2024. Station #0314 does not have the capability to support all three types of measurements (Radon, Direct Gamma, and Radioparticulate). In contrast Station #0308 has the capability to support all three types of measurements and is also more conservative as it is closer to the source of radiation than the current MEI.

Table 2. Quarterly and Average Radon Concentrations for the Crescent Junction Site for the Past Four Quarters

Station Number	3rd Quarter 2023 (pCi/L)	4th Quarter 2023 (pCi/L)	1st Quarter 2024 (pCi/L)	2nd Quarter 2024 (pCi/L)	Past 4 Quarters Average (pCi/L) (Background subtracted)
0301	0.30	0.89	0.35	0.22	Background
0311	0.27	0.62	3.90	0.19	0.65
0312	0.46	1.01	0.43	0.32	Background
0313	0.59	2.0	0.65	0.65	0.37
0314 (MEI)	0.62	2.1	0.51	0.43	0.32
0315	0.62	1.30	0.62	0.46	0.15

The Project's annual average radon emission at the Crescent Junction site boundary is below the limit of 3.0 pCi/L. The Project is compliant with DOE O 458.1 4F.

3.2 Direct Gamma

Direct Gamma radiation is monitored for the Project's MEIs at Moab and Crescent Junction. The MEI for the Moab Project Site has moved from Station #0118 to Station #0102..

The annual background direct gamma dose is 82 mrem for Moab based on three years of data collected from 2006 to 2009. The annual background direct gamma dose remains 92.5 mrem for the Crescent Junction site, based on three years of data collected from 2006 to 2009.

Direct gamma is calculated for each station by using the following equation:

R1 – T & BKG = Quarterly Total Dose (mrem)

Where:

R1: Reported dose from vendor

T: Transit dose (dose received during shipping of samples)

BKG: Background

The direct gamma background dose has been combined with transit background dose and the combination was subtracted from the reported dose from the vendor. Total dose is calculated for each direct gamma station quarterly along with a total for the past four quarters.

NOTE: The dosimeter used for direct gamma monitoring is the Landauer optically stimulated luminescence dosimeter (OSL.)

Moab Site Results

Doses from the direct gamma monitoring can be found in Table 3 below.

Table 3. Direct Gamma Doses for the Maximally Exposed Individual (and Representative Person for 2023) at the Moab Site for the Past Four Quarters

Station Number & Description	Direct Gamma Dose Calculation	3rd Quarter 2023 (mrem)	4th Quarter 2023 (mrem)	1st Quarter 2024 New MEI Station 0102 (mrem)	2nd Quarter 2024 (MEI) 0102 (mrem)	Total Dose
		(IIII eIII)	(IIII GIII)	(IIII e III)	(IIII e III)	Based on Four
	Reported Dose from Vendor	36.1	27.1	32.4	48.6	Quarters (mrem)
0102 (MEI)	Transit/Bkg. dose subtracted ¹	40.1	27.8	34.6	48.6	
	Total Dose	BKGD	BKGD	BKGD	BKGD	BKGD
	Reported Dose from Vendor	143.2	41.6	40.1	52.0	Total Dose Based on
0112	Transit/Bkg. dose subtracted ¹	40.1	27.8	34.6	48.6	Four Quarters (mrem)
	Total Dose	103.1	13.8	5.5	3.4	125.8

Table 3. Direct Gamma Doses for the Maximally Exposed Individual (and Representative Person for 2023) at the Moab Site for the Past Four Quarters (continued)

	Reported Dose from Vendor	132.5	114.0	127.9	147.8	Total Dose Based on
0110	Transit/Bkg. dose subtracted ¹	40.1	27.8	34.6	48.6	Four Quarters (mrem)
	Total Dose	92.4	86.2	93.3	99.2	371.1
	Reported Dose from Vendor	41.6	141.1	133.8	157.6	Total Dose Based on
0109	Transit/Bkg. dose subtracted ¹	40.1	27.8	34.6	48.6	Four Quarters (mrem)
	Total Dose	1.5	113.3	99.2	109.0	323.0
	Reported Dose from Vendor	N/A	26.6	45.2	49.8	Total Dose Based on
0106	Transit/Bkg. dose subtracted ¹	40.1	27.8	34.6	48.6	Four Quarters (mrem)
	Total Dose	N/A	BKGD	10.6	1.2	11.8

(Station 0106 was temporarily removed for the Q3 2023 report. There were no reported results for that time-period. 0106 will continue to be a reported location.)

Although three stations are above the 100 mrem public limit, the residency status of the individual must be considered. This dose represents 100% occupancy of this location for a year, which is unrealistic. The Project estimates a 50% occupancy factor, which is still conservative, resulting in a person receiving 50% of the reported dose from the vendor.

It is noted that Station #0109 has significantly increased since the third and fourth quarters of 2023. This station is located near the southwest corner of the tailings pile, where operations have been focused on exposing, excavating, and transporting mill debris that was buried in the area. This explains the increase in direct gamma radiation, which is expected to decrease as more debris and tailings are exposed and relocated from the area. Given this information, the Moab site is compliant with DOE O 458.1.

Crescent Junction Site Results

Results for direct gamma from the Crescent Junction site can be found in Table 4 below. Only the MEI station measures direct gamma at the Crescent Junction site.

Note:

The Direct Gamma MEI will change from Station #0314 to Station #0308 starting Q4 2024. Station #0314 does not have the capability to support all three types of measurements (Radon, Direct Gamma, and Particulate). In contrast, Station #0308 has the capability to support all three types of measurements and is also more conservative as it is closer to the source of radiation than the current MEI.

Table 4. Direct Gamma Doses for the Maximally Exposed Individual (MEI) at the Crescent Junction Site for the Past Four Quarters

Station Number & Description	Direct Gamma Dose Calculation	3rd Quarter 2023 (mrem)	4th Quarter 2023 (mrem)	1st Quarter 2024 (mrem)	2nd Quarter 2024 (mrem)	Total Dose
0314	Reported Dose from Vendor	31.6	26.8	34.6	47.8	Based on Four Quarters (mrem)
(Will change to 0308 on 10/1/2024)	Transit/Bkg. dose subtracted ¹	33.9	30.6	34.6	48.6	
	Total Dose	BKGD	BKGD	BKGD	BKGD	BKGD

The direct gamma results for the Crescent Junction MEI are indistinguishable from background radiation. The Project is in compliance with DOE O 458.1.

3.3 Radioparticulates

Radioparticulates are small particles of radioactive material, which can become airborne during project activities such as excavation and loading of RRM, or by wind. Breathing these particles can result in an internal radiation dose. Dose from inhalation of radioparticulates, along with direct gamma, are used to calculate TED.

The radioparticulate monitoring network for the Moab site consists of nine continuous air samplers: six off site (Figure 1) and three on site (Figure 2). The radioparticulate monitoring network for the Crescent Junction site consists of four stations: two off site and two on site (Figure 3).

The radionuclides of concern on the Project are those inherent in the process of extracting uranium during the milling process when the mill was operational. However, because the radionuclides are part of the uranium decay series, which is naturally occurring, they are considered part of the emissions from the Project. Therefore, all radioparticulates measured at the Project's monitoring stations are assumed to be from the Project.

The uranium milling operations at the Moab site created mill tailings from the processing of extracting the uranium from the ore. The tailings, along with radioactively inert crushed rock, water, residual milling chemicals, and process-related wastes are collectively known as residual radioactive material (RRM). The physical properties of the RRM vary from a clay-like material to a sandy material. These physical properties cause the material to have a low potential to adhere to other surfaces under dry conditions; however, when moist or wet, the material will adhere to those surfaces. Dry RRM is prone to wind dispersion, especially during disturbances, such as moving the material around the pile or loading it into containers.

Moab Site Results

Table 5 provides the dose from inhalation of radioparticulates for the second quarter 2024 and the previous three quarters at the Moab site. Filters were analyzed at an approved laboratory for concentrations of total Uranium, Actinium-227, Thorium-230, Radium-226, and Polonium-210. Actinium-227 and Protactinium-231 are assumed to be in equilibrium.

NOTE: In this quarter, the Actinium-227 and Potactinium-231 results were not included in the calculations, because the Total Propagated Uncertainty was greater than the results.

Table 5. Radioparticulate Doses for Moab Site for the Past Four Quarters

Station Number & Description	3rd Quarter 2023 (mrem)	4th Quarter 2023 (mrem)	1st Quarter 2024 (mrem)	2nd Quarter 2024 (mrem)	Past 4 Quarters Total (mrem)
0102 (MEI)	0.34	1.10	0.43	0.20	2.07
0105	0.63	1.40	0.68	0.46	3.17
0114	0.66	1.10	0.54	0.56	2.86
0117	0.36	0.76	0.23	0.17	1.52
0118	0.43	0.93	0.62	0.41	2.39
0119	0.31	0.81	0.53	0.24	1.89
0122	0.32	0.60	0.33	0.17	1.42
0123	0.24	0.70	0.46	0.16	1.56
0129	1.00	1.10	0.71	0.98	3.79

All radioparticulate dose results from the Moab site are below the DOE O 458.1 limit of 100 mrem/year for the public.

Crescent Junction Results

Table 6 provides the quarterly and average of past four quarters' dose from inhalation of radioparticulates at the Crescent Junction site. Filters were analyzed at an approved laboratory for concentrations of total Uranium, Actinium-227, Thorium-230, Radium-226, and Polonium-210. Actinium-227 and Protactinium-231 are assumed to be in equilibrium.

Note: MEI has moved to Station #0308 permanently. Former MEI at Station #0306 will

no longer be sampled starting Q4 2024. The elimination of Station #0306 is based on Station #0308 being more conservative as it is closer to the source of radiation than the previous MEI.

Table 6. Radioparticulate Doses for Crescent Junction Site for the Past Four Quarters

Station Number & Description	3rd Quarter 2023 (mrem)	4th Quarter 2023 (mrem)	1st Quarter 2024 (mrem)	2nd Quarter 2024 (mrem)	Past 4 Quarters Total (mrem)
		CJ Onsite	e Stations		
0308 (MEI)	0.32	0.82	0.37	0.23	1.74
0309	0.27	0.45	0.50	0.37	1.59
		CJ Offsite	Locations		
0306	0.24	0.66	0.51	0.18	1.59
0307	0.23	0.57	0.41	0.17	1.38

All radioparticulate dose results from the Crescent Junction site are below the DOE O 458.1 limit of 100 mrem/year for the public.

3.4 Total Effective Dose

Total Effective Dose (TED) for the Project is calculated for the MEI by using the following equation:

$$(\mathbf{Y} + \mathbf{P}_1) * \mathbf{0.5} = \mathbf{TED} \text{ (mrem)}$$

Where:

Y: Direct Gamma Dose with background subtracted (mrem)

P_{1:} Radioparticulate Dose (mrem)

0.5: 50% occupancy rate for the MEI

Moab Site MEI Dose

For the Moab MEI, the TED for the past four quarters is calculated as the following:

$$(0.0 \text{ mrem/yr} + 2.07 \text{mrem/yr}) * 0.5 = 1.0 \text{ mrem/yr}$$

The TED for the MEI at Moab is below the 100 mrem/year limit and is in compliance with DOE O 458.1.

Crescent Junction Site MEI Dose

For the Crescent Junction MEI, the TED for the past four quarters is calculated using the MEI TED formula above:

$$(0.0 \text{ mrem/yr} + 1.74 \text{ mrem/yr}) * 0.5 = 0.87 \text{ mrem/yr}$$

(Used MEI Station #0308 data for radioparticulate dose calculation for entire year.)

The TED for the MEI at Crescent Junction is below the 100 mrem/year limit and is in compliance with DOE O 458.1.

4.0 Meteorological Monitoring and Analysis

For both sites, meteorological data are collected from onsite meteorological (met) stations where data is uploaded to Ken's Weather Reporting System (KWRS), a site-specific online database created by the Project's Technical Assistance Contractor (TAC).

Moab and Crescent Junction met stations measure wind speed and direction, temperature, and precipitation. Precipitation is collected primarily with a heated rain gauge and a manual rain gauge is used for back-up purposes. Data is downloaded from KWRS, and hourly averages are analyzed. Refer to the *Moab UMTRA Project Meteorology Station Sampling and Analysis Plan* (DOE-EM/GJTAC3075) and the *Moab UMTRA Project TAC Environmental Air Monitoring Sampling and Analysis Plan* (DOE-EM/GJTAC2219) for more information and will be updated to remedial action contractor (RAC) documents soon.

Moab Site

In the Second quarter 2024, the winds were split between the northwest and the southeast at speeds from zero to 20+ miles per hour (mph). Figure 4 displays the wind rose for this quarter, with the wedges showing the frequency, speed, and direction the wind was coming from.

The average temperature for the quarter was 54° F. The lowest recorded temperature for the quarter was 45° F and the highest was 89° F. The Moab Site received 1.94 inches of precipitation during the quarter.

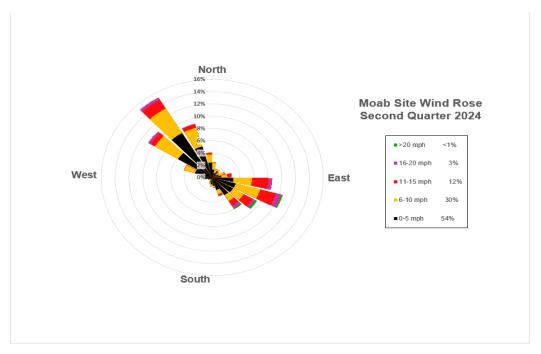


Figure 4. Moab Wind Rose for Second Quarter 2024

Crescent Junction Site

The onsite meteorological station at the Crescent Junction site was used to analyze wind, precipitation, and temperature data during this quarter.

In the second quarter, 2024, the prevailing winds were variable, ranging at speeds from zero to 15 mph. The predominant winds were more from the south and southeast direction with the occasional stronger winds coming from the southeast direction (Figure 5). The site received 1.6 inches of precipitation. The average temperature for the quarter was 59° F. The lowest recorded temperature for the quarter was 49° F and the highest was 68° F.

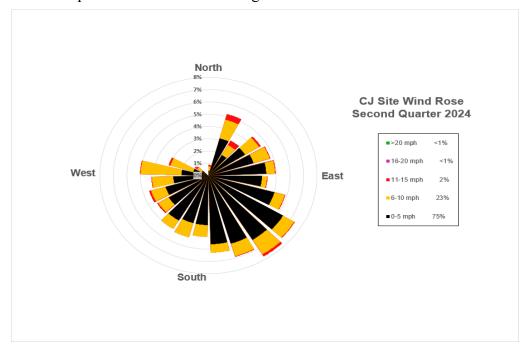


Figure 5. Crescent Junction Wind Rose for Second Quarter 2024

5.0 Data Quality

Radon measuring devices, optically stimulated luminescence (OSL) for gamma dose measurements, and radioparticulate sample filters were sent to approved off-site laboratories for analyses in accordance with the *Moab UMTRA Project Environmental Air Monitoring Sampling and Analysis Plan* (SAP) (DOE-EM/GJTAC2219). Qualified Project personnel evaluated the analytical data received for consistency with other data points and Quality Assurance/Quality Control samples.

All sample and vendor data has been entered into the Moab Environmental Sampling (MESa) database for easy review.

5.1 Station Duplicates

Duplicate monitoring samples for radon and direct gamma were collected at both sites. Qualified personnel analyzed results and there were no significant variances between results.

5.2 Suspected Anomalies

All analytical data are reviewed for anomalous or outlying data points. Monitoring data is evaluated against historical and minimum/maximum values to determine if the reported data are within reasonable expected ranges. Any anomalous data would be investigated and documented. No anomalous data was noted for this quarter.

6.0 Conclusion

This second quarter 2024 report provides documentation of compliance with DOE O 458.1 limits for dose to the public and demonstrates the dedication of the Moab UMTRA Project to the environment and public health and safety.

7.0 References

- DOE (U.S. Department of Energy), Guidance for Preparation of the 2022 Department of Energy Annual Site Environmental Reports (March 2023).
- DOE (U.S. Department of Energy), Moab UMTRA Project Environmental Air Monitoring Sampling and Analysis Plan (DOE-EM/GJTAC2219).
- DOE (U.S. Department of Energy), Moab UMTRA Project Health Physics Plan (DOE-EM/GJ3003).
- DOE (U.S. Department of Energy), *Moab UMTRA Project Meteorology Station Sampling and Analysis Plan* (DOE-EM/GJTAC3075).
- DOE (U.S. Department of Energy) Order 458.1, Admin Chg. 4, "Radiation Protection of the Public and the Environment".