

EXECUTIVE SUMMARY

The New York State Energy Research and Development Authority (NYSERDA) manages a 15-acre low-level radioactive waste disposal area, known as the "State-Licensed Disposal Area" (SDA), located at the Western New York Nuclear Service Center (Center) in western New York State. The U.S. Department of Energy (DOE) currently manages 179 acres of the Center for the West Valley Demonstration Project (WVDP), including the approximately 8-acre "NRC-Licensed Disposal Area" (NDA). NYSEERDA also manages the balance of the 3,300-acre Center property.

A Draft Environmental Impact Statement for decommissioning of the Center is being prepared jointly by DOE and NYSEERDA. NYSEERDA's preferred alternative for the SDA is to manage the facility in place for 30 more years with ongoing monitoring, inspections, maintenance, and analyses. On the recommendation of an Independent Expert Review Team (IERT), NYSEERDA made the decision to conduct a quantitative risk assessment (QRA) to evaluate the radiation risks to the public over this 30-year time period. This report documents the QRA, its supporting models, data, and analyses, and the SDA risk assessment results.

THE QRA FRAMEWORK

The fundamental elements of the QRA process are (1) the "triplet" definition of risk (defined below) to serve as a general framework for the meaning of risk, (2) a scenario approach that clearly links initial (*initiating events or initial conditions*) and final states (*consequences*) with well defined intervening events and processes, (3) the representation of uncertainty by a probability distribution (*the probability of frequency concept*), (4) a definition of probability that measures the *credibility* of a hypothesis based on the supporting evidence, and (5) information processing rooted in the fundamental rules of logic.

The general framework for the QRA is the "set of triplets" definition of risk.

$$R = \{<S_i, L_i, X_i>_c,$$

In this format, the brackets denote "the set of", and the subscript c implies that the set is complete. The risk ("R") is a comprehensive answer to the following questions:

- "What can go wrong?" This question is answered by describing a structured, organized, and complete set of possible damage scenarios ("S").
- "What is the likelihood of each scenario?" This question is answered by performing detailed analyses of each risk scenario, using the best available data and engineering knowledge of the relevant processes, and explicitly accounting for all sources of uncertainty that contribute to the scenario likelihood ("L").
- "What are the consequences?" This question is answered by systematically describing the possible end states for each risk scenario, such as different radiation dose levels that may be received by a member of the public ("X").

THE QRA SCOPE

This study evaluates the risk from continued operation of the SDA for the next 30 years with its current physical and administrative controls. The scope of this risk assessment is limited to quantification of the radiation dose received by a member of the public, represented by two potential receptors.

- A permanent resident farmer located near the confluence of Buttermilk Creek and Cattaraugus Creek
- A transient recreational hiker / hunter who traverses areas along Buttermilk Creek and the lower reaches of Frank's Creek

The study evaluates potential releases of liquid, solid, and gaseous radioactive materials from the 14 waste trenches at the SDA site. It examines a broad spectrum of potential natural and human-caused conditions that may directly cause or contribute to these releases. Threats to the site are grouped into two general categories.

- **Disruptive Events** are unexpected events that cause an immediate change to the site. They are typically characterized by an event occurrence frequency and by directly measurable immediate consequences. Examples are severe storms, tornadoes, earthquakes, fires, and airplane crashes.
- **Nominal Events and Processes** are expected events and natural processes that evolve continuously over the life of the facility. They are typically characterized by a rate, which may be constant or changing over time. The potential consequences from these processes depend on the duration of the exposure period. Examples are groundwater flows, slope subsidence, and the aging of engineered and natural systems.

The QRA includes detailed models for the mobilization, transport, distribution, dilution, and deposition of released radioactive materials throughout the environment surrounding the SDA site, including the integrated watershed formed by Erdman Brook, Frank's Creek, and Buttermilk Creek.

The scope of this study does not include intentional acts of destruction, war, terrorism, or sabotage. These types of threats could be evaluated within the SDA risk assessment framework and models. However, due to the limited resources and duration of this study, it was not feasible to evaluate either the specific types of threat scenarios that may evolve from deliberately destructive acts, or to derive realistic estimates for their potential frequencies.

EVALUATED THREATS

The scope of potential threats considered in this study includes a broad variety of natural phenomena and processes, and human-caused events. Systematic methods were used to examine and screen identified threats for their potential significance to the SDA risk. Table 1 lists the threats that were retained for explicit evaluation in the QRA models.

RELEASE MECHANISMS AND SCENARIOS

Five release mechanisms were defined to provide a framework and context for the risk scenarios. Each scenario begins with an initiating disruptive event or an evolving site process, and it results in a release of radioactive materials into the external environment. It then continues through the mobilization and transport elements of the risk models, where the released materials are distributed, diluted, and deposited throughout the area surrounding the site. The scenario finally terminates in a source of radiation exposure and dose to the study receptors.

The five SDA release mechanisms are:

- **Release Mechanism 1** involves liquid releases from the waste trenches via groundwater flows through the Unweathered Lavery Till (ULT) and Kent Recessional Sequence (KRS) soil layers. Four risk scenarios were evaluated for this release mechanism.
- **Release Mechanism 2** involves liquid releases from the waste trenches via groundwater flows through the Weathered Lavery Till (WLT) soil layer. One risk scenario was evaluated for this release mechanism.
- **Release Mechanism 3** involves liquid overflows of the waste trenches and releases via surface water runoff. Nine risk scenarios were evaluated for this release mechanism.
- **Release Mechanism 4** involves physical breaches of the waste trenches and releases of liquid and solid radioactive materials. Sixteen risk scenarios were evaluated for this release mechanism.
- **Release Mechanism 5** involves extensive physical disruption of the SDA site and airborne releases from the waste trenches. One risk scenario was evaluated for this release mechanism.

SUPPORTING ANALYSES

Detailed analyses were performed to quantify the frequencies of all threats that are analyzed in the QRA models. In most cases, extensive effort was required to supplement the limited available information and data from previous assessments, to perform a realistic evaluation of the threat frequencies and their associated uncertainties.

Several "fragility analyses" were performed to quantify the conditional likelihood that a disruptive event or natural process will cause a release of radioactive materials from the SDA waste trenches. Members of the IERT provided technical guidance and input for a number of these analyses, developed some of the analytical models, and performed some of the detailed quantifications. The fragility analyses evaluated the following technical issues.

- Seismic failures of the slopes adjacent to the SDA site
- Failures of the slopes due to landslides that are not related to seismic events or erosion
- Erosion of the waste trench caps
- Erosion and migration of slope gullies

- Groundwater flows through lateral and vertical release pathways
- Trench filling and overflows from water intrusion

NYSERDA engineers provided evaluations of potential intervention efforts to stop or mitigate the consequences of specific radioactive material release scenarios. Analyses were also performed to quantify the effects from conditions that may require extensive repairs or replacement of the geomembranes.

Comprehensive inventories of the SDA waste materials were compiled from existing databases, including the distribution of specific radionuclides at 50-foot intervals in each trench. This information was used to quantify the physical form, quantity, and radioisotopic content of the materials that are released during each risk scenario.

Geohydrologic models were developed for the area surrounding the SDA site, including the integrated drainage basin for Erdman Brook, Frank's Creek, and Buttermilk Creek. These models were used to quantify flows and dilution of radioactive liquids that are released into the stream systems, the transport of solids, and the deposition of contaminated material in stream bed sediments. An atmospheric dispersion model was used to quantify flows, transport, and dilution of radioactive aerosols released into the air.

Analyses were performed to evaluate the exposure of each receptor to contaminants that are released during each risk scenario, accounting for the specific form of the material (e.g., liquid, solid, or airborne), its quantity and concentration at the point of exposure, and its radioisotopic content. Potential doses accrue from direct exposure to contaminated creek water, sediments, and airborne species. The analyses also assume that creek water is used for crop irrigation and livestock water supplies, resulting in additional potential doses through these food chain pathways. It is assumed that creek water is not used as a domestic potable water supply. The total effective dose equivalent (TEDE) for each receptor is quantified in terms of millirem (mrem) accumulated in a 1-year period, for comparison with public health standards and other sources of radiation risk.

THE SDA RISK

Figure 1 shows the integrated risk curves for the SDA site, in the "frequency of exceedance" format that is typically used to display QRA results. The following examples illustrate how these curves are interpreted.

- **Frequency of Dose Exceeding 0.1 mrem in 1 Year**

This result is obtained by taking a vertical "slice" through Figure 1 at the dose value of 1.0E-01 mrem in 1 year. Figure 2 shows that "slice", in the "probability density" format that displays the full uncertainty about the frequency of this dose level.

The mean total frequency of all threats that cause radioactive material releases from the SDA site which result in a total effective dose to all receptors of 0.1 mrem in 1 year, or more, is approximately 2.12E-02 event per year (i.e., one event in 47 years). There is equal probability that the release frequency for this dose is greater than, or less than, the median value of approximately 1.75E-02 event per year (i.e., one event in 57 years). We are 90% confident that the release frequency is between 1.52E-02 event per year and 3.53E-02 event per year (i.e.,

between one event in 66 years and one event in 28 years). Since the mean value is the "expected" frequency of these releases, we do not "expect" to have a release that results in a dose of 0.1 mrem in 1 year, or more, during the next 30 years of SDA operation. However, the uncertainty results show that there is a small probability (slightly more than 5%) that this type of release may occur during the next 30-year operating period.

- **Frequency of Dose Exceeding 100 mrem in 1 Year**

This result is similarly obtained by taking a vertical "slice" through Figure 1 at the dose value of $1.0E+02$ mrem in 1 year. Figure 3 shows that "slice".

The mean total frequency of all threats that cause radioactive material releases from the SDA site which result in a total effective dose to all receptors of 100 mrem in 1 year, or more, is approximately $2.04E-03$ event per year (i.e., one event in 490 years). There is equal probability that the release frequency for this dose is greater than, or less than, the median value of approximately $1.86E-03$ event per year (i.e., one event in 538 years). We are 90% confident that the release frequency is between $1.50E-03$ event per year and $2.74E-03$ event per year (i.e., between one event in 667 years and one event in 365 years). The QRA results confirm that a release which results in a dose of 100 mrem in 1 year, or more, is extremely unlikely during the next 30 years of SDA operation.

Figure 4 is another representation of the SDA risk results, with an expanded scale that focuses on the dose range from 10 to 1000 mrem in 1 year. It displays the risk in terms of the number of release events that occur during the SDA 30-year operating period that is covered by this study.

It is obtained by multiplying the frequency scale in Figure 1 by 30 years. The maximum value of the y-axis corresponds to 1 event that results in a release of radioactive material from the SDA during the next 30 years. Figure 4 clearly shows that it is very unlikely that a release will occur during the next 30 years with the consequences of a 1-year dose of 100 mrem, or more. For example, the 95th probability percentile in Figure 4 at the 100-mrem vertical "slice" lies more than one decade below the once-in-30-year release value. This means that we are 95% confident that this type of release will occur much less often than once in 30 years. Figure 5 shows the complete uncertainty distribution for the "slice" at the 100 mrem dose level, further confirming the very high confidence in this conclusion.

Table 2 lists the mean ("expected") frequency of radioactive material releases for each risk scenario in terms of release events per year, the corresponding mean consequences from that scenario in terms of equivalent mrem dose in 1 year to all exposed receptors, and the product of the scenario frequency and consequences. This tabulation is useful to understand the detailed contributors to the overall SDA risk and their relative importance.

Only five scenarios individually account for more than 1% of the total SDA risk, and these five scenarios collectively account for almost 97% of the total. Each of the remaining 26 scenarios contributes less than 1% of the overall risk, and the 26 scenarios collectively account for just slightly more than 3% of the total. The top five scenarios for total SDA risk are:

- **Scenario 2 – 1** is the only scenario for Release Mechanism 2. It accounts for approximately 38.7% of the total SDA risk. The scenario involves lateral groundwater flows through the WLT soil layer near the surface of the SDA site. These releases can occur only when the water levels in the waste trenches are high, and the trenches are nearly full of water.

- **Scenario 1 – 2** is the second scenario defined for Release Mechanism 1. It accounts for approximately 34.5% of the total SDA risk. The scenario involves lateral groundwater flows through the ULT soil layer. These releases occur when water levels in the waste trenches are at or near the interface between the ULT and WLT soil layers.
- **Scenario 1 – 1** is the first scenario defined for Release Mechanism 1. It accounts for approximately 16.0% of the total SDA risk. The scenario involves lateral groundwater flows through the ULT soil layer. These releases occur when the water levels in the waste trenches are high, and the trenches are nearly full of water.
- **Scenario 3 – 4** is the fourth scenario defined for Release Mechanism 3. It accounts for approximately 4.9% of the total SDA risk. The scenario involves initial site conditions when the geomembranes are not intact, and the trench compacted clay caps are in their normal state. Water levels in the waste trenches are at or near the interface between the ULT and WLT soil layers. Total precipitation during a 14-day period exceeds 9 inches, including at least one storm with rainfall intensity that is severe enough to erode the trench caps and allow water intrusion to fill the trenches. The trenches overflow, and contaminated liquid enters the adjacent streams through surface runoff.
- **Scenario 1 – 4** is the fourth scenario defined for Release Mechanism 1. It accounts for approximately 2.6% of the total SDA risk. The scenario involves vertical groundwater flow through the ULT soil layer and subsequent lateral flow through the KRS soils, with discharges to Buttermilk Creek. The groundwater flow analyses for this release pathway are performed under conditions that are not sensitive to the initial water level in the trenches. Therefore, the results from those analyses apply for all trench water levels.

Table 2 shows that seismic damage, gully erosion, and landslide scenarios in Release Mechanism 4 contribute increasingly to the "low frequency / high consequence" end of the risk profile in Figure 1. The table shows that the mean doses from some of these scenarios can be quite significant. However, the release frequencies are extremely small, resulting in negligible contributions to overall site risk. "Intermediate frequency / intermediate consequence" scenarios in Release Mechanism 3 also contribute to the middle range of the risk spectrum.

The fractional risk contribution from each major release mechanism is:

| | | |
|----------------------|---|---------|
| Release Mechanism 1: | Groundwater flows through the ULT | 53.4% |
| Release Mechanism 2: | Groundwater flows through the WLT | 38.7% |
| Release Mechanism 3: | Trench overflows and surface water runoff | 5.6% |
| Release Mechanism 4: | Trench breaches by erosion, landslides, and earthquakes | 2.3% |
| Release Mechanism 5: | Airborne releases from SDA physical impacts | << 0.1% |

CONCLUSIONS

The QRA results confirm that the public health risk from operating the SDA for the next 30 years is well below widely applied radiation dose limits, such as the 100 mrem per year limit specified under "Radiation Dose Limits for Individual Members of the Public" in Part 380 of the State of New York Codes, Rules, and Regulations (6 NYCRR Part 380) and in Part 20 of Title 10 of the Code of Federal Regulations (10CFR20). There is extremely high confidence that potential

releases of radioactive materials from the SDA which may result in a 1-year dose to any member of the public of 100 mrem, or more, will occur much less often than once in 30 years.

Of course, these results should not be interpreted to mean that a release of this magnitude is impossible. They simply indicate that a release with these consequences is extremely unlikely during the next 30 years. If the SDA site could be maintained in its current state in perpetuity (including all geohydrologic and meteorological conditions) we would expect to experience this type of event only once in approximately 490 years.

This low level of risk will be maintained only if NYSERDA continues to operate the SDA according to its current physical and administrative controls.

The quantified risk from the SDA is dominated by a small number of event scenarios. A total of five scenarios accounts for almost 97% of the overall risk. Four of these scenarios involve releases of radioactive liquids from the waste trenches through groundwater flow paths. One scenario involves trench overtopping and radioactive liquid releases via surface runoff during heavy precipitation that occurs while the geomembranes are not intact. The risk from all five scenarios is influenced by two common factors.

- The SDA is most susceptible to these liquid release scenarios when water levels in the waste trenches are at, or above, the interface between the ULT and the WLT soil layers. The current trench levels are substantially below the ULT / WLT interface, and have been slowly decreasing. However, levels could increase in the future, if the geomembranes are not properly maintained, or if the SDA surface remains uncovered during membrane repairs or replacement.
- There are very large uncertainties in the models, parametric data, and analyses that were performed in this study to evaluate potential liquid releases through the groundwater pathways. Those uncertainties contribute significantly to the quantified level of risk from these scenarios. In most cases, the mean (or "expected") consequences from the groundwater release scenarios are determined almost completely by low probability conditions that dominate the overall uncertainty and results.

RECOMMENDATIONS

There is very large uncertainty about several of the most important risk contributors identified in this study. That uncertainty is determined almost entirely by the models and analyses for the groundwater release pathways. It is likely that these uncertainties can be substantially reduced through further refinements to the groundwater flow models, supporting data, and analyses. Relatively small reductions in the uncertainties may have a rather significant impact on the quantified risk, due to the numerical influence from low probability "tails" of the uncertainty distributions. It is recommended that NYSERDA should consider these analysis refinements to provide better resolution and improved understanding of the total SDA risk and its contributors.

The risk results are also strongly influenced by the four trench water levels that were defined during the IERT expert elicitations, and their corresponding probabilities. It is recommended

that further analyses and more formal elicitations should be performed to refine the evaluations of these water levels and their technical bases.

Apart from decisions regarding possible refinements to the QRA models, data, and analyses, it is recommended that NYSERDA should:

- Continue to actively maintain trench water levels below the ULT / WLT interface level, regardless of the status of the geomembranes and other activities at the site.
- Minimize the amount of time that the geomembrane covers are not intact, and the surface of the trench caps is exposed. This includes expedited repairs or replacement of damaged geomembrane sections, and minimizing the time and extent of surface uncovering during planned geomembrane replacements.
- Formalize emergency preparedness plans and guidelines for responses to the types of release scenarios that are evaluated in this study. The risk from specific scenarios is affected significantly by the credit that has been applied for these intervention and mitigation responses.
- Monitor liquid activity levels in Buttermilk Creek water at a location just upstream from the confluence with Frank's Creek, with a sampling interval that is more frequent than once every 5 years. This sampling location would provide more positive detection of possible groundwater releases via the deep ULT / KRS pathways that discharge directly into Buttermilk Creek.
- Periodically sample the water in each trench and monitor the concentrations of radionuclide species.

Table 1. Threats Included in the SDA Risk Assessment

Disruptive Events

- Aircraft Crashes
 - Commercial
 - General aviation
 - Military
- Erosion
 - Local streams
 - Trenches
- Extraterrestrial Impacts (meteorites)
- Fires
 - Offsite (e.g., grass fires, forest fires)
- Flooding Events
 - Extreme precipitation
 - Rapid snow melt
- High Wind Events
 - Extreme sustained winds
 - Wind gusts
 - Tornadoes
- Landslides
- Pipeline Accidents
 - Site natural gas supply pipe
- Seismic Events
 - Direct seismic failures
- Severe Storms (snow)

Nominal Events and Processes

- Corrosion / Deterioration / Decomposition
 - Geomembrane covers
 - Crates, boxes
 - Steel drums
- Groundwater Intrusion
 - Historic intrusion
 - Rapid intrusion ("bath-tubbing")
- Soil Shrink / Swell / Consolidation

| Scenario | Mean Frequency (event / year) | Mean Dose (mrem in 1 year) | Mean Frequency x Dose [(mrem in 1 year) / year] | Fraction of Total Risk | Cumulative Fraction of Total Risk | Contributing Conditions |
|-----------------|--------------------------------------|-----------------------------------|--|-------------------------------|--|---|
| 2 – 1 | 3.33E-03 | 431.50 | 1.44E+00 | 3.87E-01 | 0.387 | Groundwater, Level = High, WLT Lateral |
| 1 – 2 | 1.00E-02 | 128.36 | 1.28E+00 | 3.45E-01 | 0.732 | Groundwater, Level = ULT / WLT, ULT Lateral |
| 1 – 1 | 3.33E-03 | 178.46 | 5.95E-01 | 1.60E-01 | 0.892 | Groundwater, Level = High, ULT Lateral |
| 3 – 4 | 5.50E-03 | 33.15 | 1.80E-01 | 4.85E-02 | 0.941 | Overflow, Level = ULT / WLT, Geomembranes unavailable, Precipitation > 9 inches in 14 days |
| 1 – 4 | 3.33E-02 | 2.94 | 9.79E-02 | 2.63E-02 | 0.967 | Groundwater, ULT-KRS |
| 4 – 1 | 6.30E-05 | 491.54 | 3.09E-02 | 8.30E-03 | 0.975 | Local Landslide or Seismic Damage 1, Solids |
| 3 – 3 | 1.18E-03 | 22.88 | 2.59E-02 | 6.97E-03 | 0.982 | Overflow, Level = High, Geomembranes damaged and surface disturbed, Precipitation > 1 inch in 14 days |
| 4 – 1b | 1.89E-05 | 1109.61 | 2.05E-02 | 5.53E-03 | 0.988 | Local Landslide or Seismic Damage 1, Level = WLT / ULT, Liquids |
| 4 – 1c | 3.78E-05 | 532.61 | 1.97E-02 | 5.31E-03 | 0.993 | Local Landslide or Seismic Damage 1, Level = Current / Low, Liquids |
| 4 – 1a | 6.30E-06 | 2307.98 | 1.42E-02 | 3.83E-03 | 0.997 | Local Landslide or Seismic Damage 1, Level = High, Liquids |
| 1 – 3 | 1.83E-02 | 0.38 | 6.97E-03 | 1.88E-03 | 0.999 | Groundwater, Level = Current, ULT Lateral |

| Scenario | Mean Frequency (event / year) | Mean Dose (mrem in 1 year) | Mean Frequency x Dose [(mrem in 1 year) / year] | Fraction of Total Risk | Cumulative Fraction of Total Risk | Contributing Conditions |
|-----------------|--------------------------------------|-----------------------------------|--|-------------------------------|--|--|
| 3 – 5 | 2.17E-05 | 46.69 | 1.01E-03 | 2.72E-04 | 0.999 | Overflow, Level = ULT / WLT, Geomembranes intact, Wind or Tornado, Precipitation > 9 inches in 14 days |
| 3 – 6 | 1.51E-05 | 46.69 | 7.03E-04 | 1.89E-04 | 0.999 | Overflow, Level = ULT / WLT, Geomembranes damaged and surface disturbed, Precipitation > 9 inches in 14 days |
| 3 – 2 | 1.64E-05 | 33.15 | 5.40E-04 | 1.45E-04 | 1.000 | Overflow, Level = High, Geomembranes intact, Wind or Tornado |
| 4 – 3b | 2.64E-07 | 1331.53 | 3.73E-04 | 1.00E-04 | 1.000 | Seismic Damage 2, Level = WLT / ULT, Liquids |
| 4 – 3 | 8.81E-07 | 387.71 | 3.44E-04 | 9.25E-05 | 1.000 | Seismic Damage 2, Solids |
| 4 – 3c | 5.28E-07 | 576.99 | 3.23E-04 | 8.69E-05 | 1.000 | Seismic Damage 2, Level = Current / Low, Liquids |
| 4 – 3a | 8.81E-08 | 2751.82 | 2.57E-04 | 6.91E-05 | 1.000 | Seismic Damage 2, Level = High, Liquids |
| 3 – 7 | 2.91E-06 | 46.69 | 1.33E-04 | 3.57E-05 | 1.000 | Overflow, Level = Current / Low, Geomembranes unavailable, Precipitation > 25 inches in 14 days |
| 3 – 1 | 1.65E-06 | 33.15 | 5.82E-05 | 1.57E-05 | 1.000 | Overflow, Level = High, Geomembranes unavailable, Precipitation 24- or 48-Hour Storm |
| 4 – 2 | 7.00E-08 | 491.54 | 3.44E-05 | 9.26E-06 | 1.000 | Gully Erosion, Solids |

| Scenario | Mean Frequency (event / year) | Mean Dose (mrem in 1 year) | Mean Frequency x Dose [(mrem in 1 year) / year] | Fraction of Total Risk | Cumulative Fraction of Total Risk | Contributing Conditions |
|-----------------|--------------------------------------|-----------------------------------|--|-------------------------------|--|---|
| 4 – 2b | 2.10E-08 | 1109.61 | 2.47E-05 | 6.64E-06 | 1.000 | Gully Erosion, Level = WLT / ULT, Liquids |
| 4 – 2c | 4.20E-08 | 532.61 | 2.37E-05 | 6.37E-06 | 1.000 | Gully Erosion, Level = Current / Low, Liquids |
| 4 – 2a | 7.00E-09 | 2307.98 | 1.71E-05 | 4.60E-06 | 1.000 | Gully Erosion, Level = High, Liquids |
| 4 – 4b | 1.51E-09 | 2929.36 | 4.58E-06 | 1.23E-06 | 1.000 | Global Landslide, Level = WLT / ULT, Liquids |
| 4 – 4c | 3.02E-09 | 1242.76 | 3.89E-06 | 1.05E-06 | 1.000 | Global Landslide, Level = Current / Low, Liquids |
| 4 – 4a | 5.03E-10 | 4749.11 | 2.48E-06 | 6.66E-07 | 1.000 | Global Landslide, Level = High, Liquids |
| 3 – 8 | 1.17E-08 | 46.69 | 4.70E-07 | 1.26E-07 | 1.000 | Overflow, Level = Current / Low, Geomembranes intact, Wind or Tornado, Precipitation > 25 inches in 14 days |
| 3 – 9 | 8.96E-09 | 46.69 | 3.58E-07 | 9.64E-08 | 1.000 | Overflow, Level = Current / Low, Geomembranes damaged and surface disturbed, Precipitation > 25 inches in 14 days |
| 4 – 4 | 5.03E-09 | 41.94 | 2.01E-07 | 5.40E-08 | 1.000 | Global Landslide, Solids |
| 5 – 1 | 3.73E-07 | 0.20 | 7.48E-08 | 2.01E-08 | 1.000 | Aircraft crash or meteorite |

ES-13

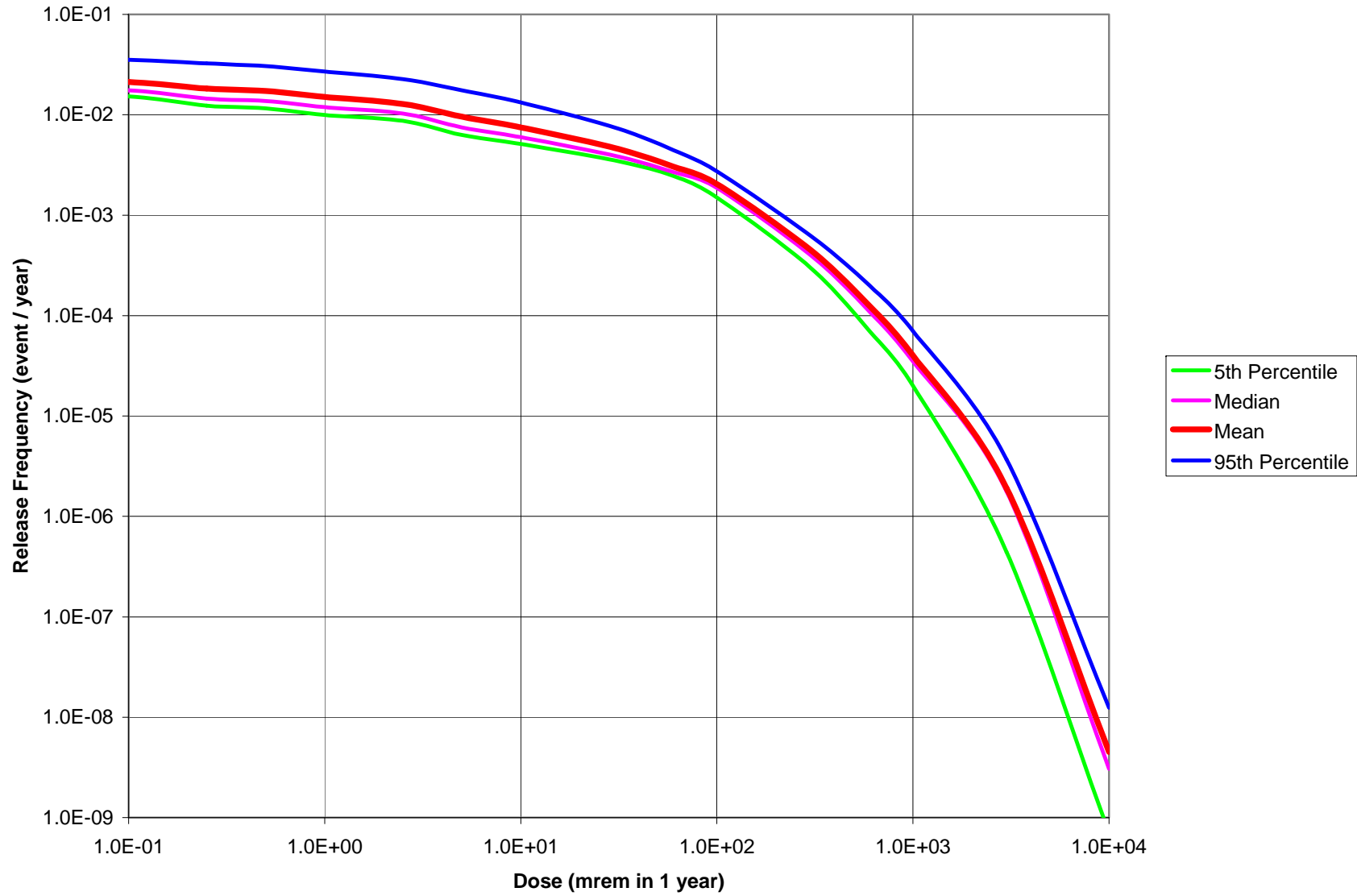


Figure 1. SDA Risk Curves, Exceedance Frequency Format

ES-14

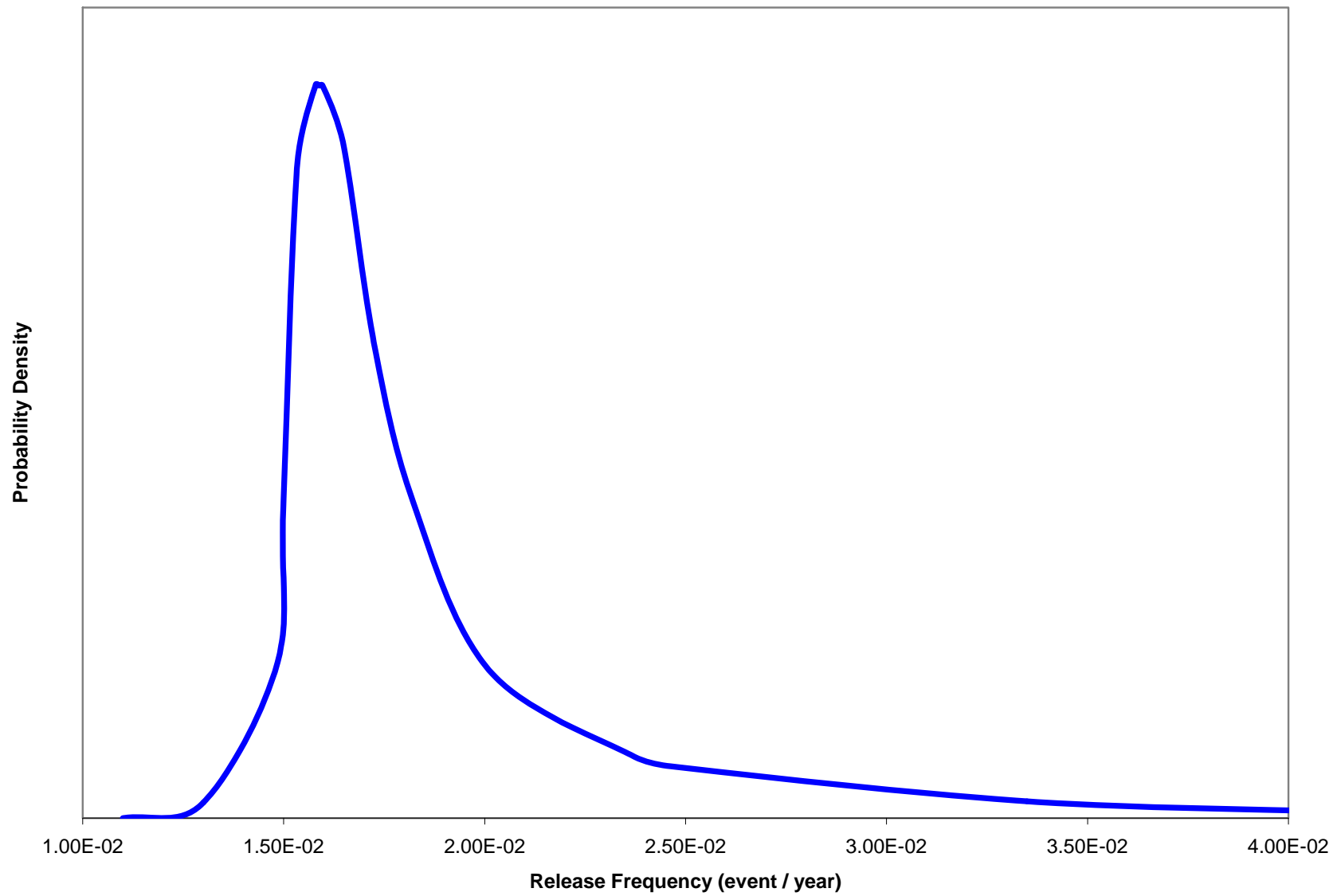


Figure 2. Release Frequency for Exceeding a Dose of 0.1 mrem in 1 Year, Probability Density Format

ES-15

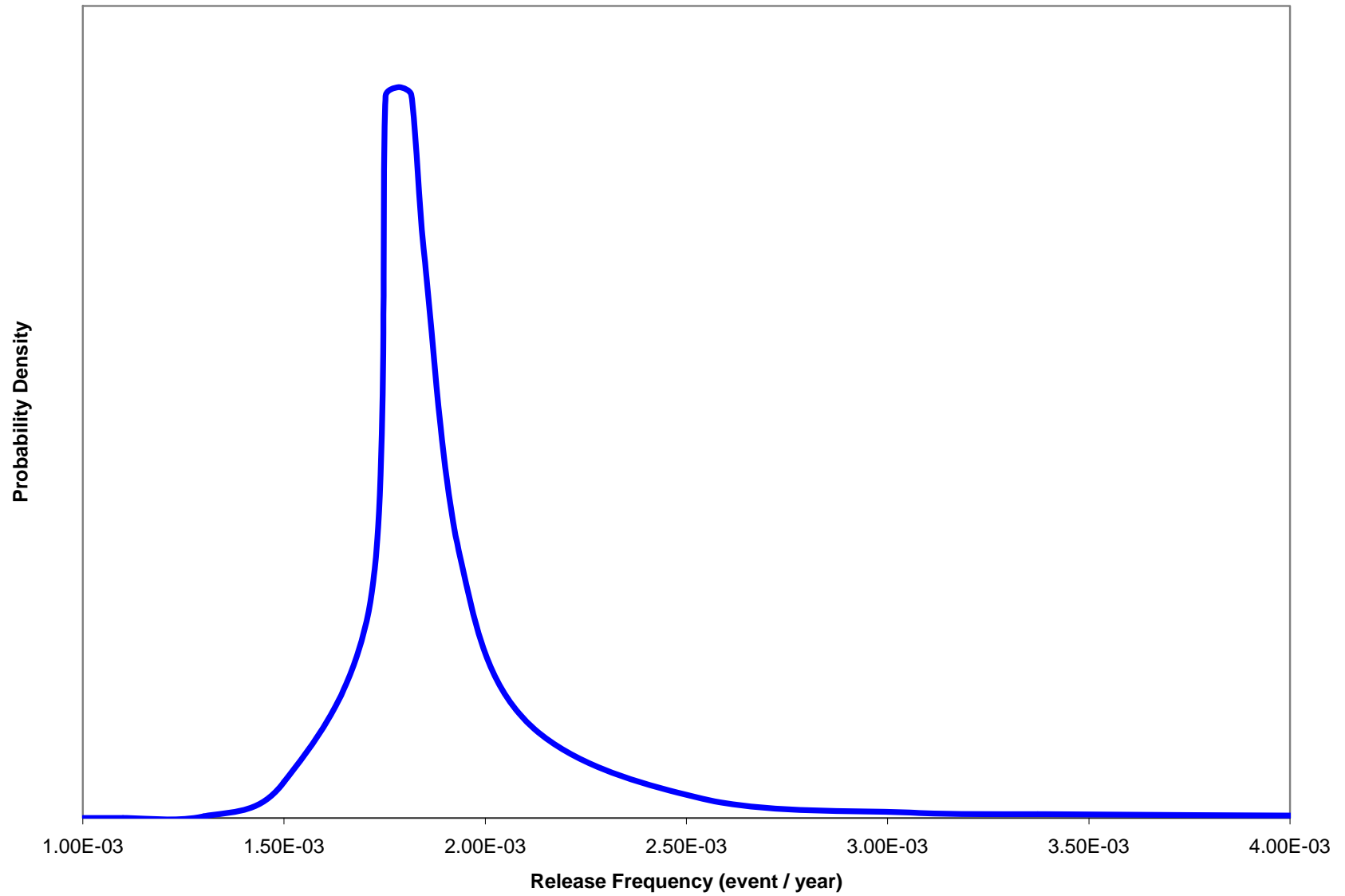


Figure 3. Release Frequency for Exceeding a Dose of 100 mrem in 1 Year, Probability Density Format

ES-16

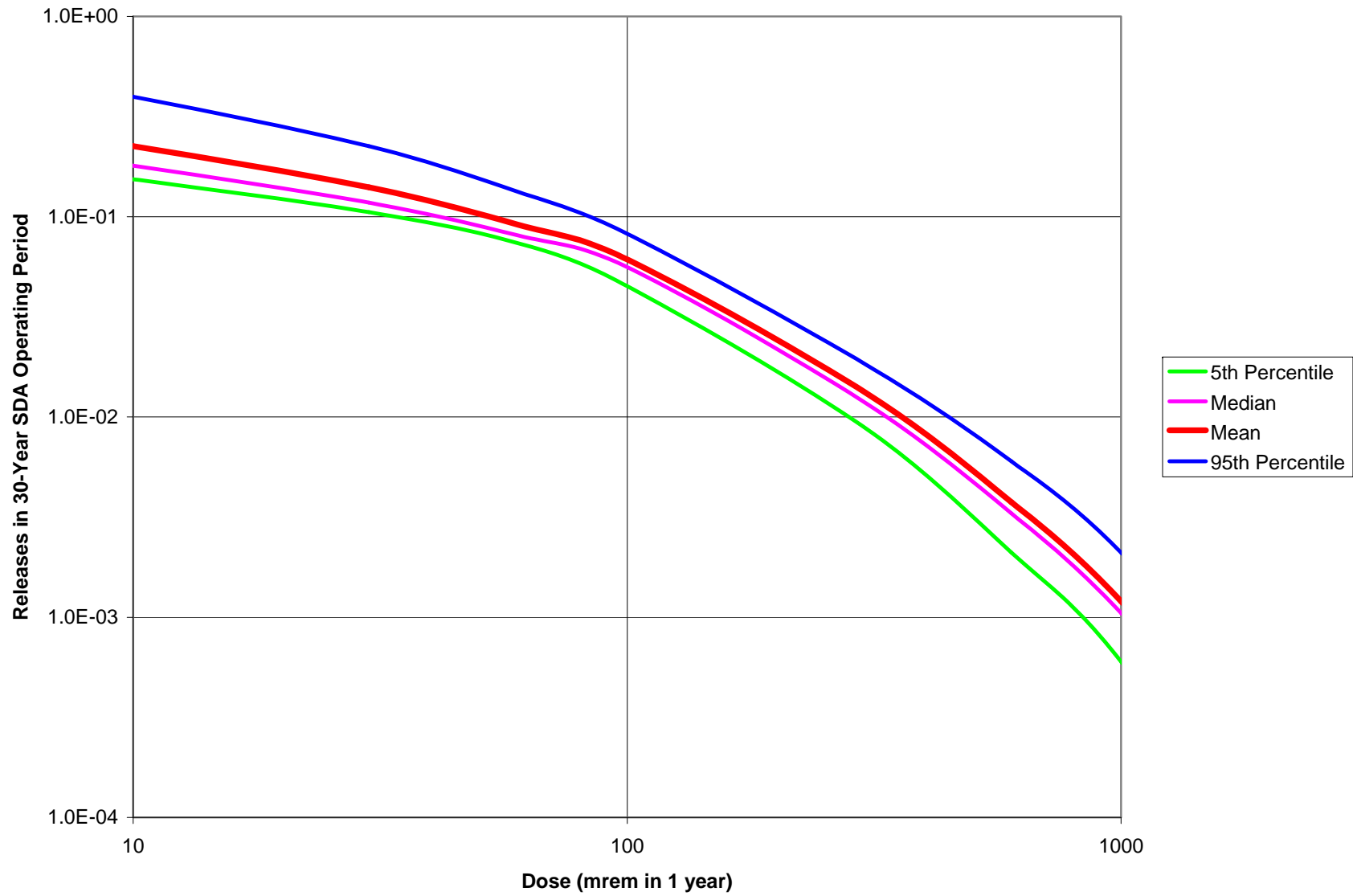


Figure 4. SDA Risk Curves, 30-Year Operation Period Exceedance Format (Expanded Scale)

ES-17

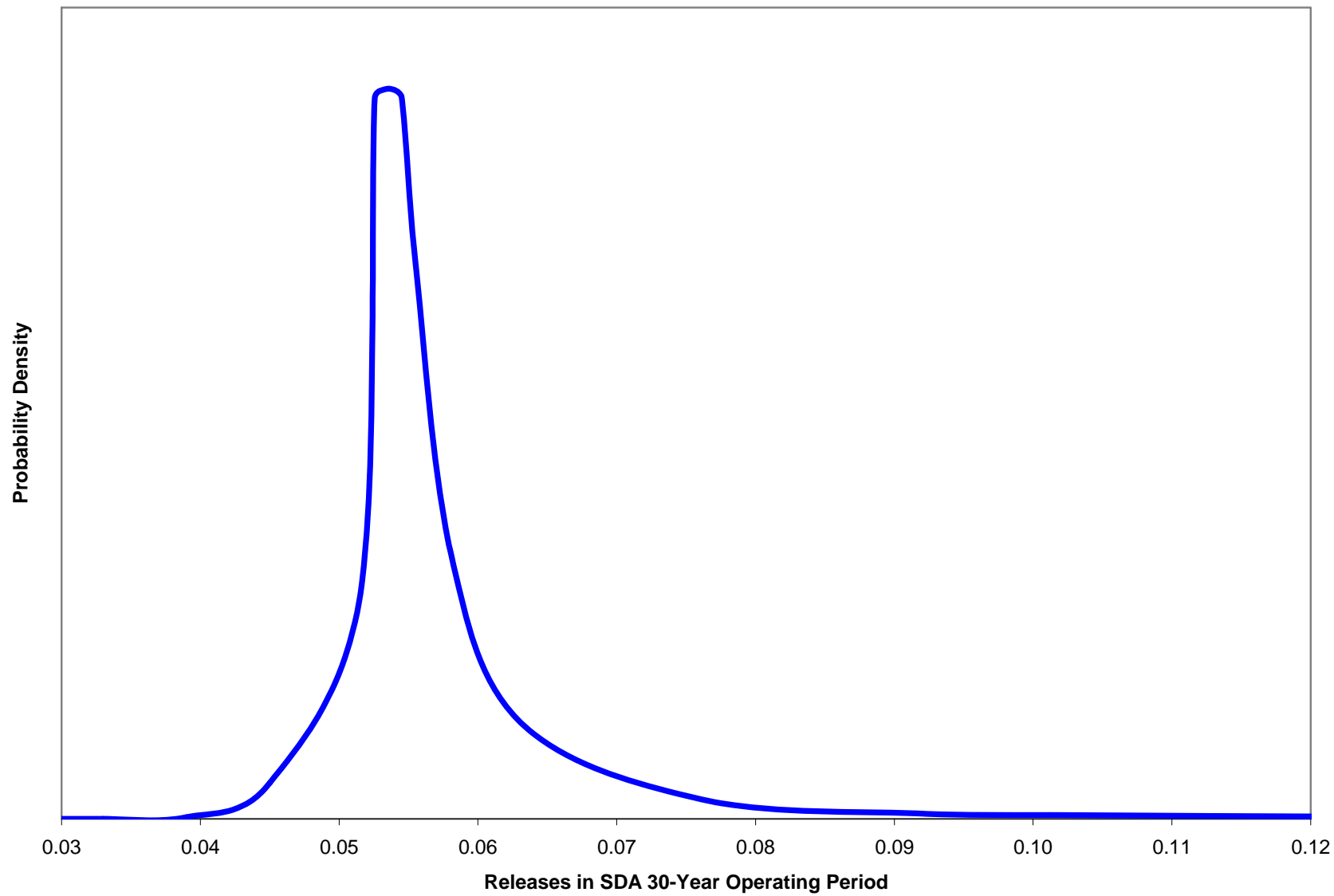


Figure 5. Releases in SDA 30-Year Operation Period with Doses that Exceed 100 mrem in 1 Year