

From: Littleton, Brian
Sent: Thursday, November 19, 2015 10:34 AM
To: Hanlon, Edward Hanlon.Edward@epa.gov
Subject: RE: followup from 11/10/15 RAC teleconference

Ed,

During the 11/10/15 RAC teleconference, OAR noted it would provide more information on why plutonium 239 was a focus constituent of concern in the original rule rather than uranium. We have looked into this issue, and we have summarized our findings in the response below:

The aim of the release limits found in 40 CFR 190.10(b) was on persistent and long-lived radionuclides created as a result of nuclear power operations. Statements were made in the technical support documents that indicate that the Agency had reviewed the releases of uranium from these facilities and found that sufficient efforts were being made to capture (via HEPA filtration for particulates and chemical traps for gases) and reduce the uranium to very low levels. As there was an increased concern regarding the additional contributions of man-made radioisotopes, the Agency developed a release limit for transuranic alpha-emitters (with half-lives greater than 1 year) since all occurrences of these isotopes emanated from man-made activities. As such, specific release limits were not developed for uranium isotopes. If you need any more follow-up on this issue, feel free to contact me directly.

Thanks,
Brian