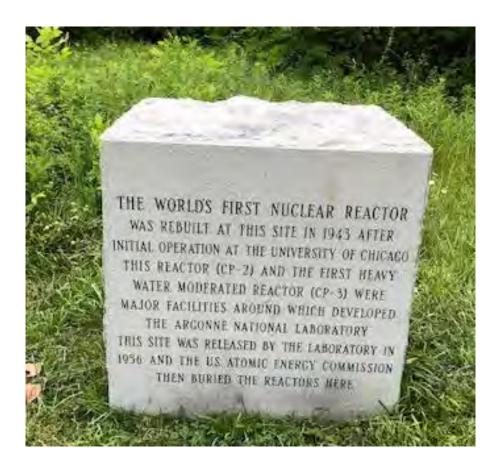


## Site A and Plot M 2024 Surveillance Report and 2025 Inspection Report

Environment, Safety, and Health Directorate



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# Site A and Plot M 2024 Surveillance Report and 2025 Inspection Report

Prepared by Collin Klimek and Jordan Vopat Environment, Safety, and Health Directorate Argonne National Laboratory

#### A NOTE FROM THE AUTHORS

This Site A and Plot M 2024 Surveillance Report and 2025 Inspection Report was prepared by the Environment, Safety and Health, (ESH) Directorate at Argonne National Laboratory (Argonne) for the U.S. Department of Energy Office of Legacy Management (DOE-LM). The results of the Site A and Plot M environmental monitoring program and the results of the annual site inspection are presented in this publication. This report is available on the Internet at <a href="https://www.anl.gov/reference/argonne-site-environmental-reports">https://www.anl.gov/reference/argonne-site-environmental-reports</a>.

Many of the figures and tables were prepared by Jennifer Tucker (ESH). Some figures, however, were prepared by the authors of this publication. Many members of the Environmental Protection Program and the Analytical Services Laboratory contributed to this report. Names are listed below.

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# SURVEILLANCE OF SITE A AND PLOT M ANNUAL REPORT FOR 2024

#### 1.0 SUMMARY

The results of the environmental surveillance program conducted at Site A/Plot M for calendar year (CY) 2024 are presented within this document. Site A/Plot M is in the Palos Area Preserves managed by the Forest Preserve District of Cook County. The surveillance program consists of the collection and analysis of surface and groundwater samples to determine the amount of hydrogen-3 and strontium-90 present in the environment within and surrounding the site of the former research facility (Site A) and waste burial site (Plot M).

In CY2024, the sampling program was optimized after reviewing historical and current data. This decision was made in conjunction with the Illinois Emergency Management Agency (IEMA) who continues collecting split samples for data comparison purposes. Locations sampled remained consistent, but the frequency of sample collection was changed for most wells in the Site A/Plot M network. The new sampling schedule implemented at the beginning of CY2024 can be found in Table 3-1. The summary of changes is as follows:

- Site A groundwater monitoring wells changed from annual sampling to every 2 years.
- Plot M groundwater monitoring wells changed from quarterly sampling to annual.
- Red Gate Groundwater monitoring wells and former picnic wells changed from annual sampling to every 2 years.
- Plot M surface water sampling changed from quarterly sampling to annual.

The CY2024 results indicate that, with few exceptions, the amounts of hydrogen-3 and strontium-90 are slowly decreasing as a result of decay and dilution in most locations and are relatively stable in others. The maximum potential radiation dose to a hypothetical resident near Plot M resulting from residual radioactivity in this area was estimated to be 0.74 mrem/y, based upon very conservative assumptions. A more realistic estimate of potential dose is 0.00105 mrem per visit for an occasional park visitor. A "visitor" is defined as an individual drinking one liter of water from Stream Location 6 and one liter of water from the Red Gate Woods North (#5160) picnic well. The two doses are then combined for the total potential radiation dose. The maximum potential dose is far below the DOE's allowable dose to the public of 100 mrem/y.

Hydrogen-3 concentrations in surface water in two small intermittent streams that pass by Plot M were below the detection limit of 0.1 nCi/L upstream of Plot M, and appeared at a maximum of 13.99 nCi/L downstream of Plot M, a value below the IL EPA Class I groundwater quality standard of 20 nCi/L. Five samples of surface water were collected from ponds in the vicinity of Site A. None of these ponds contained hydrogen-3 above the detection limit of 0.1 nCi/L.

Hydrogen-3 continued to be detected during CY2024 in eight wells surrounding Plot M, with well BH09 being dry during the sampling event. The results were found to be slowly decreasing and consistent with previous results in seven of the nine monitoring wells. Monitoring wells BH06 and BH35 had the highest concentrations of hydrogen-3. In recent years, the hydrogen-3 concentration in BH06 has increased compared to concentrations found prior to 2009 as seen in Figure 4-6. As seen in Figure 4-7, hydrogen-3 concentration in BH35 slightly decreased in CY2024 compared to previous years. Low levels of strontium-90 were found in groundwater from two of the eight Plot M wells sampled. Since 2010, the strontium-90 results in well BH06 appear to be slightly increasing as shown in Figure 4-9. The other strontium-90 results are consistent with those measured in the past. All concentrations were below the State of Illinois' Class I Groundwater Quality Standard of 8 pCi/L for strontium-90.

As shown in Figure 4-11, the two wells in the vicinity of Site A were found to contain much lower amounts of hydrogen-3 than the Plot M wells. The amounts present were found to be slowly decreasing and were consistent with past observations. As shown in Figure 4-12, low levels of strontium-90 were also found in the two Site A wells. All results were below groundwater quality standards. The six deep wells at Red Gate Woods that were constructed in the dolomite bedrock downgradient of Plot M were found to contain low levels of hydrogen-3, all below the State of Illinois' Class I Groundwater Quality Standard of 20 nCi/L. The CY2024 results were consistent with past findings and demonstrate that hydrogen-3 concentrations in these wells are, in general, slowly decreasing.

Two unused former picnic wells were also sampled at Red Gate Woods. Both wells had low levels of hydrogen-3, similar to last year's results. The hydrogen-3 levels in the former picnic well at Red Gate Woods North increased from 2010 to 2014 as shown in Figure 4-15, followed by a downward trend from 2014 to the CY2024 sampling event. All results were below the State of Illinois' Class I Groundwater Quality Standard of 20 nCi/L for hydrogen-3.

The results of the surveillance program continue to indicate that the radioactivity remaining at Site A/Plot M does not endanger the health or safety of the public visiting the site, using the picnic areas, or living in the vicinity.

#### 2.0 INTRODUCTION

#### 2.1 Site History

The environmental surveillance program discussed in this report is an ongoing activity that resulted from the 1976-1978 radiological characterization of the former site of Argonne National Laboratory and its predecessor, the University of Chicago's Metallurgical Laboratory. This site was part of the World War II Manhattan Engineer District Project and was located in a forested area southwest of Chicago, IL, owned by the Forest Preserve District of Cook County, now known as the Palos Area Preserves. Research was conducted at two locations in the Palos Area Preserves: Site A, a 19-acre parcel that contained experimental laboratories and nuclear reactor facilities; and Plot M, a 150 ft x 140 ft area used for the burial of radioactive waste. The location of the Palos Area Preserves is shown in Figure 2.1. The locations of Site A and Plot M are shown in Figure 2-2 along with Site A surface water sample locations and Red Gate Woods picnic well locations. Previous comprehensive reports on this subject 1,2 provide additional detail and illustrations on sampling locations and provide descriptive material along with the results through 1981. Annual surveillance reports are available for 1982 through 2023. 3-36,49-56 While earlier data will not be repeated in this report, reference is made to some of the results.

Operations at Site A began in 1943 and ceased in 1954. Among the research programs carried out at Site A were reactor physics studies, fission product separations, hydrogen-3 recovery from irradiated lithium, and work related to the metabolism of radionuclides in laboratory animals. Radioactive waste and radioactively contaminated laboratory articles from these studies were buried at Plot M. At the termination of the programs, the reactor fuel and heavy water, used for neutron moderation and reactor cooling, were removed, and shipped to Oak Ridge National Laboratory. The biological shield for the CP-3 reactor located at Site A, together with various pipes, valves, and building debris, was buried in place in 1956.

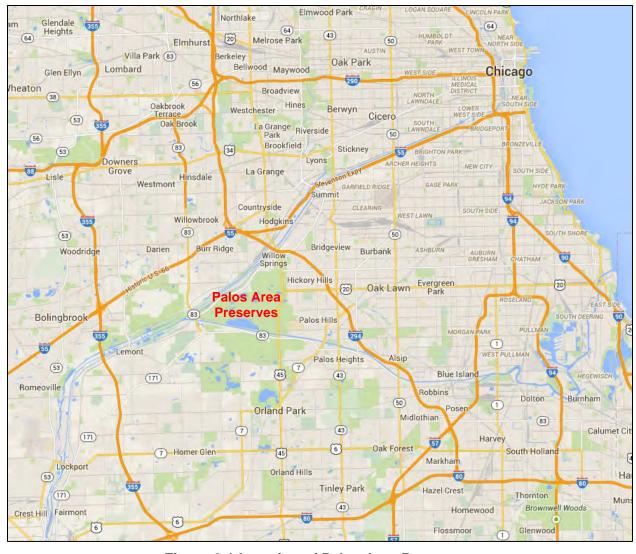


Figure 2-1 Location of Palos Area Preserves

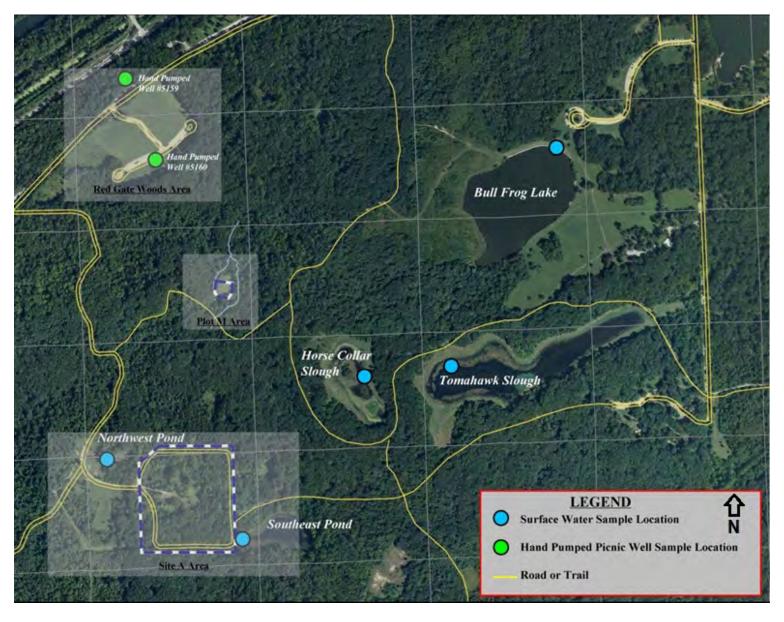


Figure 2-2 Site A/Plot M Area Map

Burial of radioactive waste at Plot M began in 1944 and was discontinued in 1949. Waste was buried in six-foot deep trenches and covered with soil until 1948, after which burial took place in steel bins. The steel bins were removed in 1949 and sent to Oak Ridge National Laboratory for disposal; however, the waste buried in trenches was allowed to remain in place. Concrete sidewalls, eight feet deep, were poured around the perimeter of the burial area and a one-foot-thick reinforced concrete slab was poured over the top. The concrete slab was covered with soil and seeded with grass. Both the Site A and Plot M areas were decommissioned in 1956.

In 1973, elevated levels of hydrogen-3 (as tritiated water) were detected by Argonne in two nearby hand-pumped picnic wells (#5160 and #5159). Later investigations found the hydrogen-3 to be migrating from the Plot M burial plot into the surrounding soil and aquifers. As a result, a radiological survey of the area surrounding the site was conducted by Argonne in 1976 with special emphasis on the Site A and Plot M areas.<sup>1</sup>

In 1990, elevated levels of radioactivity were discovered outside the original developed area. By 1997, additional characterization and remediation had been completed by DOE to remove residual radioactivity and document the remediation of the area. The Illinois Department of Nuclear Safety Division of Environmental Monitoring collected soil samples and issued their radiological verification report in May 1997 to document that DOE's removal action met the intended objective and that dose rates are within normal background.

The terminology used in previous reports is continued in this report. A hole drilled and well installed into the glacial drift is called a borehole (BH). Water from such wells is called groundwater. Monitoring wells drilled into the dolomite bedrock are called deep holes (DH). The former hand-pumped drinking water wells, which are completed into or close to the dolomite bedrock, are called picnic wells. They are identified by a location name and well number.

The results of radioactivity measurements are expressed in this report in terms of picocuries per liter (pCi/L) for strontium-90 and nanocuries per liter (nCi/L) for hydrogen-3 in water samples. The use of the term dose throughout this report refers to effective dose equivalent. Radiation effective dose equivalent calculations are reported in units of millirem (mrem) or millirem per year (mrem/y). Other abbreviations of units are defined within the text of this report.

#### 2.2 <u>Site Characteristics</u>

Geologically, Plot M is constructed on a moraine upland which is dissected by two valleys, the Des Plaines River valley to the north and the Calumet Sag valley to the south. The upland is characterized by rolling terrain with poorly developed drainage. Streams are intermittent and either drain internally or flow to one of the valleys. The area is underlain by glacial drift, dolomite, and other sedimentary rocks. The uppermost bedrock is Silurian dolomite, into which both the picnic wells and some of the monitoring wells are placed. The dolomite bedrock is about 200 feet thick. The overlying glacial drift has a thickness that ranges from 165 feet at Site A to zero at the Des Plaines River and Calumet Sag Canal. The boreholes terminate in this layer of overlying glacial drift. The depth to bedrock at Plot M is about 130 feet.

Hydrologically, the surface water consists of ponds and intermittent streams. When there is enough precipitation, an intermittent stream flows past Plot M, continues near the Red Gate Woods picnic well (#5160 in Figure 2-2), and discharges into the Illinois and Michigan (I&M) Canal. The groundwater in the glacial drift and dolomite bedrock forms two distinct flow systems. The flow of groundwater in the drift is controlled principally by topography. The groundwater in the dolomite, which is recharged by groundwater migrating downward through the glacial drift, flows toward two discharge areas, the Des Plaines River to the north and the Calumet Sag Canal to the south. There is no groundwater usage downgradient of Site A/Plot M. The former hand-pumped picnic wells have been disabled by removing the handles. These wells are currently used only for groundwater monitoring.

The climate is that of the upper Mississippi valley, as moderated by Lake Michigan, and is characterized by cold winters and hot summers. Precipitation averages about 40 inches annually. The largest rainfall occurs between April and September. The average monthly temperature ranges from 17°F in January to 84°F in July. Approximately 8.9 million people reside within 50 miles of the site; the population within a five-mile radius is about 150,000. The only portion of the Palos Area Preserves in the immediate area of Plot M and Site A that is developed for public use is the Red Gate Woods picnic area (Figure 2-2), although small numbers of individuals use the hiking and biking trails that pass through more remote areas of the Preserve.

#### 3.0 MONITORING PROGRAM

#### 3.1 Purpose of the Monitoring Program

The monitoring program at Site A/Plot M was conducted in accordance with the "Long-Term Surveillance and Maintenance Plan for Site A and Plot M, Palos Forest Preserve, Cook County, Illinois", issued in August of 2024<sup>58</sup>. This plan superseded the previous Long-Term Surveillance and Maintenance Plan of January 2015<sup>37</sup>. DOE-LM conducts stewardship activities at Site A and Plot M to protect human health and the environment, facilitate stakeholder involvement, and to comply with applicable regulations. DOE-LM carries out its stewardship responsibilities through a combination of government ownership of the encapsulated waste material, groundwater monitoring wells, Site A and Plot M monuments, and Plot M corner markers, conducting regular inspections, maintaining institutional controls, facilitating public awareness, and monitoring environmental media.

The monitoring program is assessed by DOE-LM periodically to determine if the goals are being met. At each review, changes to the monitoring program may be recommended. Following reviews conducted in 2011 (DOE 2011) <sup>38</sup> and 2014 (DOE 2014)<sup>39</sup>, the monitoring program was updated in CY2015. Following a review of historical trending data in all Site A and Plot M Wells and surface water locations in CY2023, the monitoring program was updated, effective in CY2024. The 2011 and 2014 reviews found that, except for hydrogen-3 at Plot M, past monitoring results indicated that concentrations of radionuclides were low, and trends were decreasing and consistent. The low concentrations, coupled with the consistent trends, indicated that, with the exception of sampling for hydrogen-3 at Plot M, the major monitoring objectives could be met through annual rather than quarterly sampling. It was found that eight groundwater monitoring wells could be plugged and abandoned without jeopardizing monitoring objectives. In 2015, these wells were sealed and abandoned, in accordance with Illinois Environmental Protection Agency requirements. Four wells were closed at Site A (BH41, BH51, BH52 and BH54). Four deep dolomite wells at Red Gate Woods were also closed (DH09, DH10, DH13, and DH17). The sampling frequency for the remaining wells at Site A and Red Gate Woods and including the two picnic wells and five ponds near Site A and Plot M, were reduced from quarterly to annual in 2015. The sampling program for Plot M was not changed in 2015 and remained on a quarterly schedule. The constituents of concern in groundwater and surface water continued to be limited to hydrogen-3 and strontium-90. In CY2024, the sampling program was changed further after trending and reviewing historical and current data.

This decision was made in conjunction with the IEMA to continue collecting split samples for data comparison purposes. Locations sampled remained consistent, but the frequency of sample collection was changed for most wells in the Site A/Plot M network. These changes were highlighted in Section 1.0. Samples collected, analyses performed, and the sampling frequency are shown in Table 3-1.

#### 3.2 <u>Structure of the Monitoring Program</u>

The Site A/Plot M monitoring program follows the guidance for monitoring at DOE facilities. <sup>40</sup> Although Site A/Plot M is not an active DOE facility, the same monitoring principles are applicable. The monitoring program is designed to assess the concentration of hydrogen-3 and strontium-90 in groundwater near these sites, and to monitor hydrogen-3 in two of the former picnic wells in Red Gate Woods and several surface waters in the vicinity. This is accomplished by analyzing water samples collected from groundwater wells and surface water. Sampling locations are described in the following sections of this report.

The samples were analyzed by the Argonne Radiological Protection Division Analytical Services Radiochemistry laboratories using DOE-approved methods. The detection limit for hydrogen-3 in water is 0.1 nCi/L. The detection limit for strontium-90 is 0.25 pCi/L in water. The uncertainties associated with individual concentrations for strontium-90 shown in the tables are the statistical counting errors at the 95% confidence level. Because of the amount of hydrogen-3 data presented in many of the tables, the uncertainty values are not included. In such cases, the following typical uncertainties apply:

<u>Hydrogen-3 Concentration (nCi/L)</u>	<u>Uncertainty (% of Conc.)</u>
0.1-1.0	40-5%
1-10	5-1%
> 10	1%

Table 3-1 Environmental Monitoring Program for Site A and Plot M

Site A – Groundwater from monitoring wells in glacial drift BH55 Biennial¹ Biennial BH56 Biennial¹ Biennial Site A region – surface water ponds Northwest Pond Annual NSR Bull Frog Lake Annual NSR Horse Collar Slough Annual NSR Tomahawk Slough Annual NSR Plot M - Groundwater from monitoring wells in glacial drift BH02 Annual Annual BH03 Annual Annual BH04 Annual Annual BH06 Annual Annual BH09 Annual Annual BH10 Annual Annual BH11 Annual Annual BH11 Annual Annual BH26 Annual Annual BH35 Annual Annual BH35 Annual Annual BH16 Annual Annual BH17 Annual Annual BH18 Annual Annual BH18 Annual Annual BH19 BH19 BH11 Annual Annual BH10 BH11 Annual Annual BH26 BH11 Annual Annual BH26 BH11 Annual Annual BH35 Annual Annual BH35 Annual Annual BH35 Annual Annual BH36 Biennial¹ NSR DH04 Biennial¹ NSR DH11 Biennial¹ NSR DH14 Biennial¹ NSR DH15 Biennial¹ NSR DH15 Biennial¹ NSR Red Gate Woods - Groundwater from former picnic wells in dolomite  5159 Biennial¹ NSR Red Gate Woods - Groundwater from former picnic wells in dolomite  5159 Biennial¹ NSR Plot M - Surface Water Location 1 Annual NSR Plot M - Surface Water Location 7 Annual NSR	Location name	Frequency –	Frequency –
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BH03	Plot M - Groundwater from	n monitoring wells	in glacial drift
BH04         Annual         Annual           BH06         Annual         Annual           BH09         Annual         Annual           BH10         Annual         Annual           BH11         Annual         Annual           BH26         Annual         Annual           BH35         Annual         Annual           Red Gate Woods - Groundwater from monitoring wells in dolomite         NSR           DH03         Biennial <sup>1</sup> NSR           DH04         Biennial <sup>1</sup> NSR           DH11         Biennial <sup>1</sup> NSR           DH12         Biennial <sup>1</sup> NSR           DH14         Biennial <sup>1</sup> NSR           DH15         Biennial <sup>1</sup> NSR           Red Gate Woods - Groundwater from former picnic wells in dolomite         S159         Biennial <sup>1</sup> NSR           F160         Biennial <sup>1</sup> NSR           Plot M - Surface Water         Location 1         Annual         NSR           Location 6         Annual         NSR           Location 7         Annual         NSR	BH02	Annual	Annual
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Location 6 Annual NSR Location 7 Annual NSR		Annual	NSR
Location 7 Annual NSR			
	Location 8	Annual	NSR

NSR = No Sample Required

<sup>&</sup>lt;sup>1</sup> Biennial for the next 5 years; if results remain below respective IL EPA Class 1 Groundwater Quality Standards, sampling reduces to every 5 years starting in CY2029.

#### 4.0 RESULTS OF THE MONITORING PROGRAM

Unless otherwise noted in the appropriate table, during CY2024, all planned samples were collected. Results of the environmental surveillance program conducted during CY2024 are presented in the following sections of this report.

#### 4.1 Plot M Surface Water Streams and Forest Preserve Ponds

Surface water samples were collected annually from four sampling locations along the two streams that flow around Plot M, shown in Figure 4-1, when sufficient flow was present. Location 1 is upstream of the Plot M area. Location 6 is immediately north and downstream of Plot M, with Locations 7 and 8 slightly further north. During April of CY2024, samples were collected from all four surface water stream locations after a heavy precipitation event.

The surface water stream samples were analyzed for hydrogen-3 and the results are shown in Table 4-1. The same concentration pattern in the water flowing around Plot M was observed this year as in the past. Concentrations were below the detection limit upstream of Plot M (Location 1); hydrogen-3 was the highest at Location 6. The amount of hydrogen-3 at Location 6 in the April of CY2024 sample was 13.99 nCi/L.

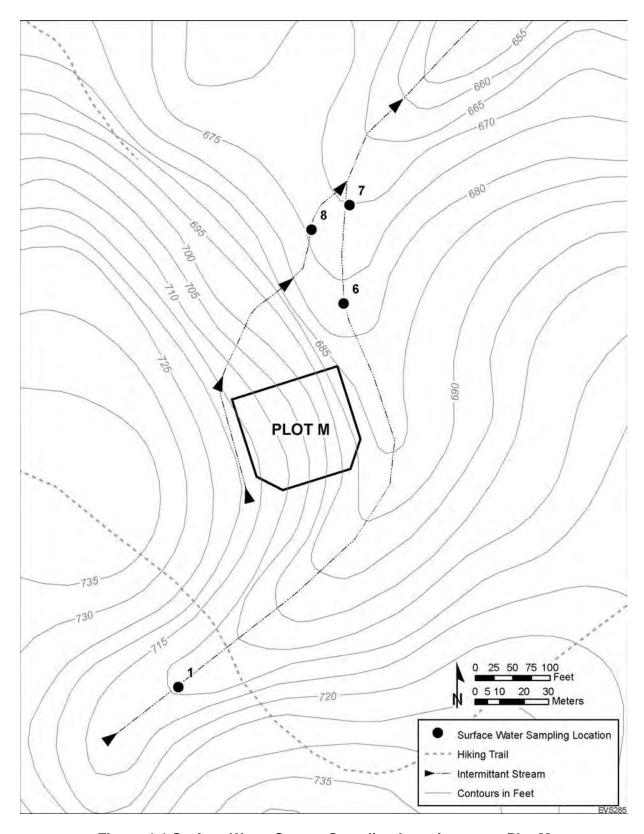


Figure 4-1 Surface Water Stream Sampling Locations near Plot M

Table 4-1 Hydrogen-3 Content of Streams Next to Plot M, April 3, 2024

Location Number <sup>1</sup>	Hydrogen-3 Concentrations in nCi/L
1	< 0.10
6	13.99
7	3.650
8	0.603

<sup>&</sup>lt;sup>1</sup> See Figure 4-1

Hydrogen-3 concentrations in the streams vary greatly, depending in part on the amount of precipitation prior to sample collection. Figure 4-2 illustrates how some of the previous years' samples from Locations 7 and 8 had higher than normal hydrogen-3 concentrations. In previous years, samples were collected during times of very low flow in the streams due to dry weather prior to the sampling event. The low flow conditions could have resulted in surface water with higher contribution of groundwater emanating from the Plot M area, resulting in higher-than-normal hydrogen-3 concentrations. This also allows for a more conservative risk assessment of human health and the environment. Following the Environmental Monitoring Program schedule, these stream locations will again be sampled in CY2025.

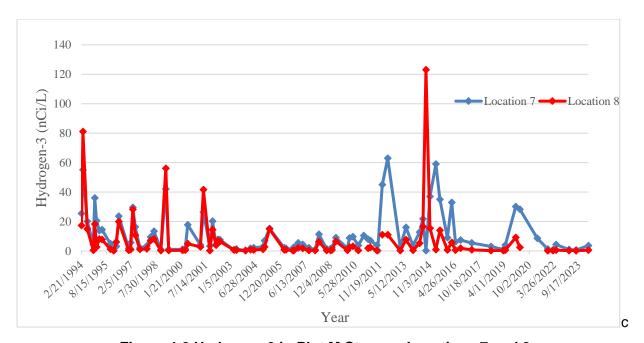


Figure 4-2 Hydrogen-3 in Plot M Streams Locations 7 and 8

One set of samples from five surface water ponds in the vicinity of Site A was collected in October of CY2024. These surface water bodies are the pond northwest of Site A, the pond southeast of Site A, Horse Collar Slough, Tomahawk Slough, and Bull Frog Lake. These locations are identified in Figure 2-2. The samples were analyzed for hydrogen-3 and the results are presented in Table 4-2. All the hydrogen-3 results were below the detection limit of 0.1 nCi/L. Following the Environmental Monitoring Program schedule, these surface water ponds will again be sampled in CY2025.

Table 4-2 Hydrogen-3 Content of Site A Area Ponds, October 24, 2024

Location	Hydrogen-3 Concentrations in nCi/L
NW Site A	< 0.1
SE Site A	< 0.1 (<0.1) <sup>1</sup>
Bull Frog Lake	< 0.1
Horse Collar Slough	< 0.1
Tomahawk Slough	< 0.1

<sup>&</sup>lt;sup>1</sup> Duplicate QC sample results are denoted in parentheses.

#### 4.2 Plot M Groundwater

Nine boreholes screened within the glacial drift are present in and around Plot M (Figure 4-3). Two of these wells (BH09 and BH10) were drilled at a 45° angle to intercept groundwater under the waste. Water samples were collected in all nine wells and water level measurements were recorded annually in the seven un-slanted wells. During the annual sampling event in CY2024, BH09 was dry.

All the water samples were analyzed for hydrogen-3; the results are shown in Table 4-3. Duplicate quality control sample results are shown in parentheses. The hydrogen-3 concentrations varied widely from well to well. The hydrogen-3 concentrations follow similar trends over the past several years. Most of the results indicate that hydrogen-3 concentrations are slowly decreasing in these wells.

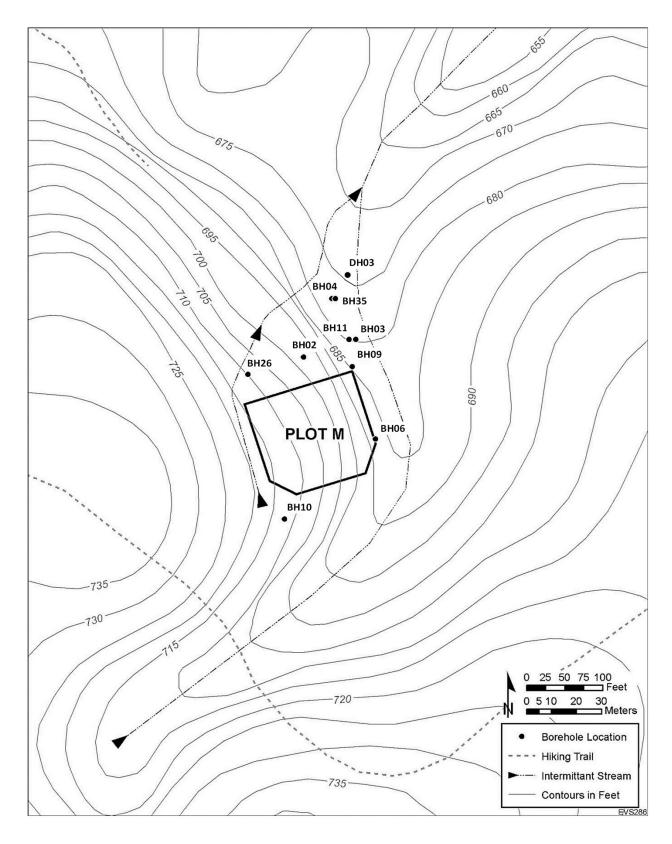


Figure 4-3 Map of Plot M Site

Table 4-3 Hydrogen-3 Content of Plot M Monitoring Well Water, September 26, 2024

Borehole Number	Well Depth (ft)	Hydrogen-3 Concentrations in nCi/L
BH02	39.41	7.587 (7.857) <sup>1</sup>
BH03	40.00	9.662 (33.830) <sup>1</sup>
BH04	36.05	245
BH06	40.30	1,478
BH09 <sup>2</sup>	40.00	DRY
BH10 <sup>2</sup>	40.00	22.90
BH11	39.30	44.91
BH26	60.65	58.19
BH35	105.50	798.8

<sup>&</sup>lt;sup>1</sup> Duplicate QC sample results are denoted in parentheses.

The highest hydrogen-3 concentrations near Plot M during CY2024 were found in BH04, BH06, BH35. Figure 4-4 shows the trend in hydrogen-3 concentrations in wells BH03 and BH04. Since 1991 there has been a steady decrease in hydrogen-3 concentration in these wells. Figure 4-5 shows the trend of hydrogen-3 concentrations in well BH09. This well had very high levels of hydrogen-3 during the 1990s but concentrations have significantly decreased since 1999.

<sup>&</sup>lt;sup>2</sup> Slant well drilled at 45° to a depth of 40 ft. below the surface.

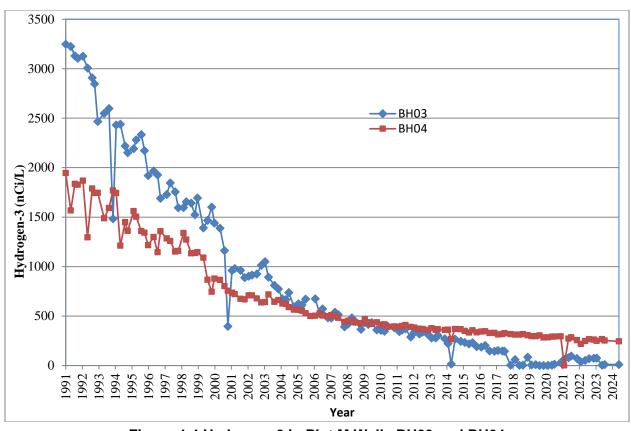


Figure 4-4 Hydrogen-3 in Plot M Wells BH03 and BH04

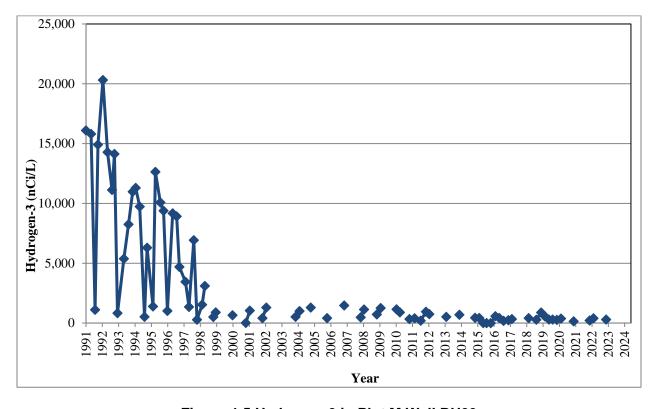


Figure 4-5 Hydrogen-3 in Plot M Well BH09

As shown in Table 4-3, well BH06 contained a relatively high hydrogen-3 concentration during CY2024. The trend in hydrogen-3 concentrations in BH06 since CY1991 is shown in Figure 4-6, which also depicts groundwater elevations in this well. From CY1994 through the first half of CY2009, the hydrogen-3 concentrations ranged from 50 to 150 nCi/L. Since CY2009, the highest concentration of hydrogen-3 was seen in CY2019 at 5,693 nCi/L and the lowest in CY2014 at 46 nCi/L. During the CY2024 sampling event, the concentration was 1,478 nCi/L. Since 2009, groundwater elevations were found to have fluctuated more than during the period between 1994 and 2009. The changing groundwater elevations could be responsible for the recent increase in hydrogen-3 concentrations and the wide variability between sample results.

The hydrogen-3 concentrations in Well BH35, shown in Figure 4-7, have been steadily increasing since 2003 but has remained below historic highs. The cause of the increase is related to downward movement of the hydrogen-3 plume beneath Plot M to the northeast towards the Des Plaines River. Well BH35 is the deepest at 105 feet and is located downgradient of Plot M.

Figure 4-8 shows hydrogen-3 concentrations in Well BH02 since 1991. The hydrogen-3 concentrations in this well remained at low levels during CY2024, as compared to 2012 and 2013, which had samples with relatively high levels of hydrogen-3. This figure also shows the groundwater elevation in the well. Figure 4-8 indicates that the spikes in hydrogen-3 concentration that occurred in previous years happened during periods when the groundwater elevation was lower than normal. Lower groundwater elevations could change the way groundwater moves and interacts with contaminated soil under Plot M, causing the hydrogen-3 concentrations to vary widely.

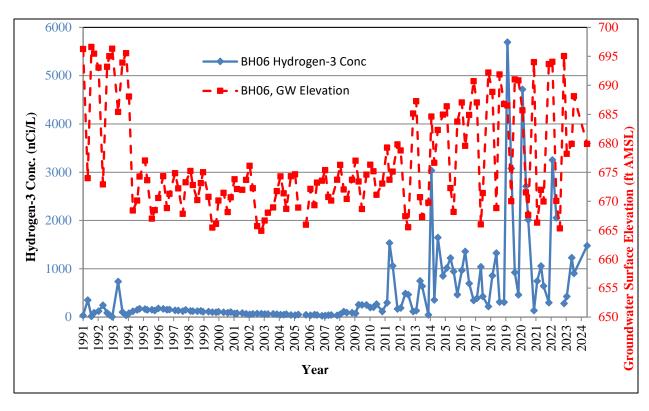


Figure 4-6 Hydrogen-3 and Groundwater Elevation in Well BH06

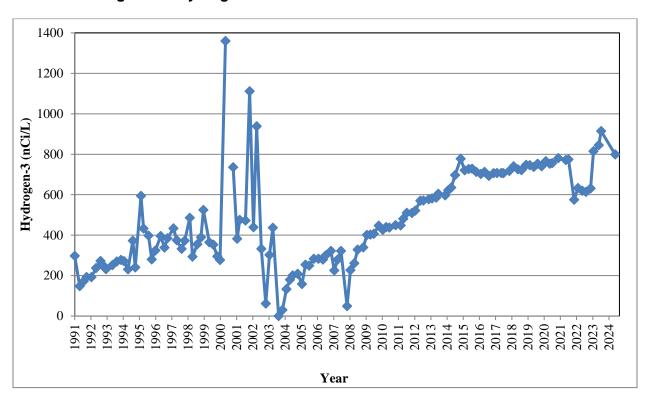


Figure 4-7 Hydrogen-3 in Well BH35

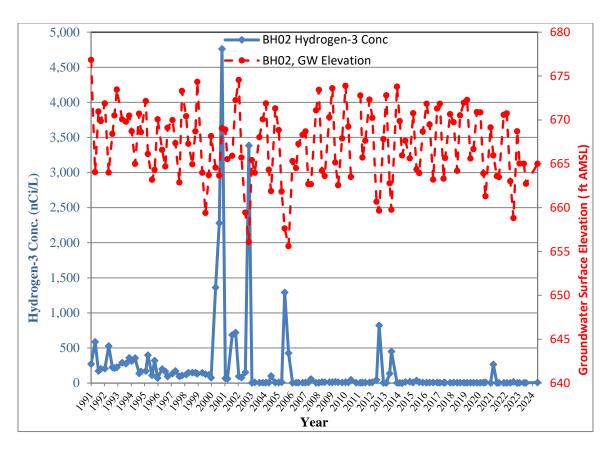


Figure 4-8 Hydrogen-3 and Groundwater Elevation in Well BH02

Groundwater samples from the Plot M monitoring wells were analyzed once for strontium-90 during CY2024. The results are shown in Table 4-4. Strontium-90 concentrations greater than the detection limit of 0.25 pCi/L were found in two (BH06 and BH11) of the nine wells sampled. Well BH09 was dry during the September sampling event. The highest strontium-90 concentration in CY2024 was 1.454 pCi/L in water collected from BH06. The Strontium-90 concentration detected in BH11 was 1.071 pCi/L. Figure 4-9 illustrates the historical trend of strontium-90 results in BH06 and BH11. BH02 and BH09 strontium results, which are often seen above detection levels, cannot be illustrated due to the wells frequently being dry. With a few exceptions, the amount of strontium-90 in BH11 is decreasing over time. Strontium-90 concentrations in BH06, which had been relatively consistent since 2010, have recently been more variable. All results were less than the State of Illinois Class 1 Ground Water Quality Standard of 8 pCi/L for strontium-90.

Table 4-4 Strontium-90 Content of Monitoring Well Water Samples Near Plot M, September 26, 2024

Well Number <sup>1</sup>	Well Depth (ft.)	Strontium-90 Concentrations in PCi/L
BH02	39.41	<0.25
BH03	40.00	<0.25
BH04	36.05	<0.25 <sup>3</sup>
BH06	40.30	1.454 ± 0.1473
BH09 <sup>2</sup>	40.00	DRY
BH10 <sup>2</sup>	40.00	<0.25
BH11	39.30	1.071 ± 0.1147
BH26	60.65	<0.25
BH35	105.50	<0.25

<sup>&</sup>lt;sup>1</sup> See Figure 4-2 for map of Plot M site

<sup>&</sup>lt;sup>3</sup> BH04 was analyzed each quarter for Sr-90 and Cs-137 as part of the intercomparison program with the IEMA laboratory. All samples collected during 2024 were <0.25 pCi/L.

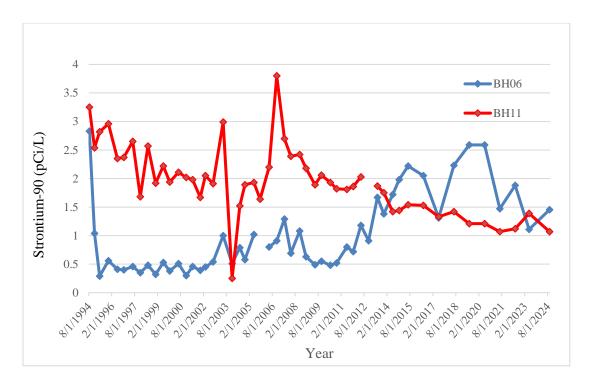


Figure 4-9 Strontium-90 in Plot M Wells BH06 and BH11

<sup>&</sup>lt;sup>2</sup> BH09 and BH10 are slant wells drilled at 45° to a depth of 40 ft. below the surface.

The depth-to-groundwater and groundwater elevations in the vertical wells at Plot M are shown in Table 4-5. Groundwater elevations measured during CY2024 in most of the shallow wells were consistent with typical groundwater elevations in these wells. Groundwater elevations for the two slant wells are not included in this table. Due to the difference in the screen depth of these wells, data cannot be used to develop potentiometric surface maps of the Plot M area. The differing well depths, in addition to the groundwater elevation differences between nearby wells, indicate that a hydraulic connection between the wells cannot be assumed. In general, Plot M groundwater flows downward and downgradient to the northeast, toward the Des Plaines River. Following the Environmental Monitoring Program schedule, these wells will again be sampled in CY2025.

Table 4-5 Water Level Measurements in Monitoring Wells Near Plot M, September 26, 2024

Well Number¹	Depth (ft.)	Top of Casing Elevation (ft. AMSL) <sup>2</sup>	Depth to Water (ft.)	Water Surface Elevation (ft. AMSL)
BH2	39.41	692.70	28.15	664.55
ВН3	40.00	693.30	32.15	661.15
BH4	36.05	682.20	21.44	660.76
BH6	40.30	704.90	33.14	671.76
BH11	39.30	693.00	27.46	665.54
BH26	60.65	692.30	47.75	644.55
BH35	105.5	682.40	93.29	589.11

<sup>&</sup>lt;sup>1</sup> Water depth for wells 09 and 10 are not shown since these are slant wells.

<sup>&</sup>lt;sup>2</sup> From 1994 IT Study report. AMSL = Above Mean Sea Level.

#### 4.3 Site A Groundwater

The locations of the two Site A monitoring wells are shown in Figure 4-10. Hydrogen-3 monitoring results are shown in Table 4-6. Strontium-90 monitoring results are shown in Table 4-7. The results found in water from wells BH55 and BH56 are most likely originating from the buried CP-3 biological shield. The hydrogen-3 concentrations at Site A are several orders of magnitude lower than those found at Plot M and are trending downward. Figure 4-11 shows the decreasing hydrogen-3 concentrations in these two wells. Figure 4-12 shows the decreasing strontium-90 concentrations in these two wells. Groundwater levels were measured in these monitoring wells, and the values appear in Table 4-8. All results were less than the State of Illinois Class 1 Ground Water Quality Standard of 20 nCi/L for hydrogen-3 and 8 pCi/L for strontium-90. Following the Environmental Monitoring Program biennial schedule, these wells are scheduled to be sampled again in CY2026.

Table 4-6 Hydrogen-3 Content of Monitoring Well Water Samples Near Site A, September 26, 2024

Well Number	Depth (ft.)	Hydrogen-3 Concentrations in nCi/L
BH55	87.20	0.593
BH56	102.40	0.592

Table 4-7 Strontium-90 Content of Monitoring Well Water Samples Near Site A, September 26, 2024

Borehole Number	Depth (ft.)	Strontium-90 Concentrations in pCi/L
BH55	87.20	0.97 ± 0.151
BH56	102.40	1.27 ± 0.176

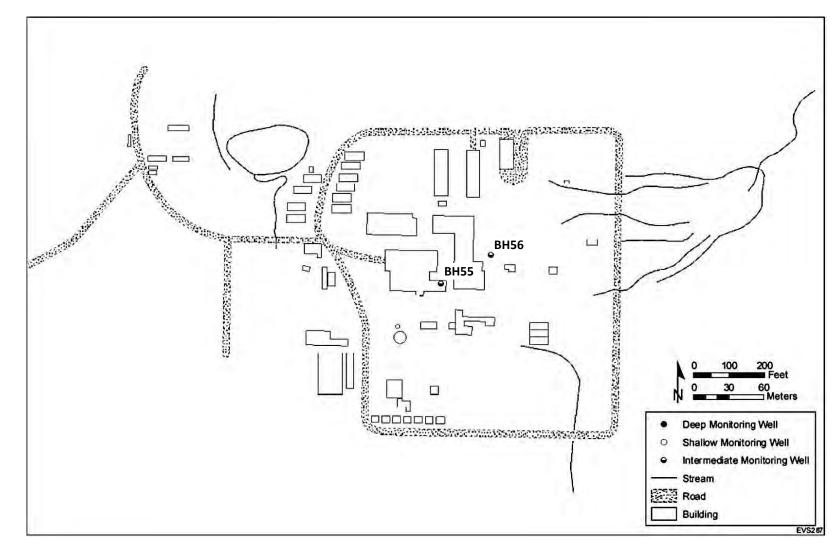


Figure 4-10 Monitoring Wells at Site A

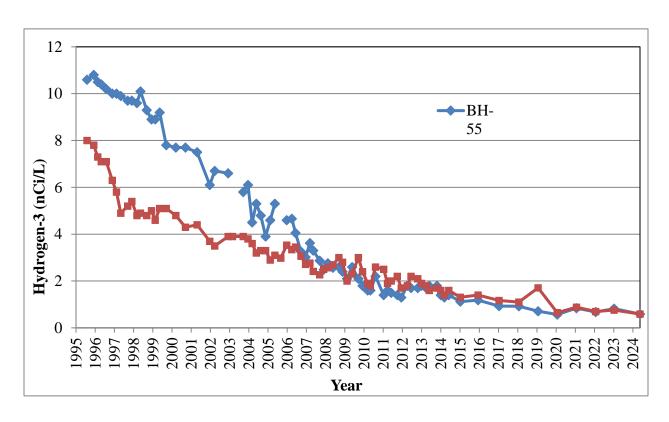


Figure 4-11 Hydrogen-3 in Site A Wells BH55 and BH56

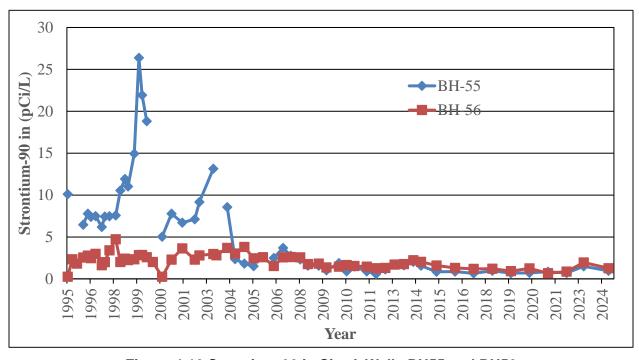


Figure 4-12 Strontium-90 in Site A Wells BH55 and BH56

Table 4-8 Water Level Measurements in Monitoring Wells Near Site A, September 26, 2024

Well Number	Depth to Bottom (ft)	Top of Casing Elevation (ft AMSL) <sup>1</sup>	Depth to Water (ft)	Water Surface Elevation (ft AMSL) <sup>1</sup>
BH55	87.2	743.78	81.44	662.34
BH56	102.4	742.23	87.45	654.78

<sup>&</sup>lt;sup>1</sup> From 1996 Advanced Surveying and Mapping topo map.

**AMSL** 

#### 4.4 Red Gate Woods

Six wells cased into the dolomite bedrock were sampled once in CY2024 to monitor the movement of hydrogen-3 within this aquifer located downgradient of Plot M. One of the dolomite wells (DH03) is located just north of Plot M. Five dolomite wells that are located north of Plot M in the Red Gate Woods area are shown in Figure 4-13. All samples were analyzed for hydrogen-3. The results are shown in Table 4-9. All the dolomite wells exhibited low but measurable hydrogen-3 concentrations, and all the results are consistent with concentrations measured in the past. The well with the consistently highest hydrogen-3 results is DH15. Figure 4-14 shows the hydrogen-3 concentrations in DH15 since 1989. The hydrogen-3 results were stable over the period from 1998 through 2017, after which a steady decline has been observed. All the dolomite well samples were below the State of Illinois Class 1 Groundwater Quality Standard of 20 nCi/L. The presence of hydrogen-3 in these wells is explained by the 1988 USGS investigation<sup>41</sup>, which indicated a hydrogen-3 plume underlies the stream which flows from Plot M and passes to the northeast of these wells. The plume has spread downward and downgradient, resulting in small amounts of hydrogen-3 in the dolomite aquifer in this area.

Two dolomite wells, DH03 and DH04, are located close to and downgradient of Plot M. The CY2024 hydrogen-3 result for DH03 was 0.52 nCi/L, and 0.77 nCi/L for DH04 which are slightly lower than previous samples. The hydrogen-3 concentrations in all dolomite wells were below 20 nCi/L. Previous analyses of soil core samples<sup>42</sup> indicated the presence of hydrogen-3 as deep as the drift-dolomite interface in the vicinity of these wells. Following the Environmental Monitoring Program biennial schedule, these wells are scheduled to be sampled again in CY2026.

<sup>=</sup> Above Mean Sea Level.

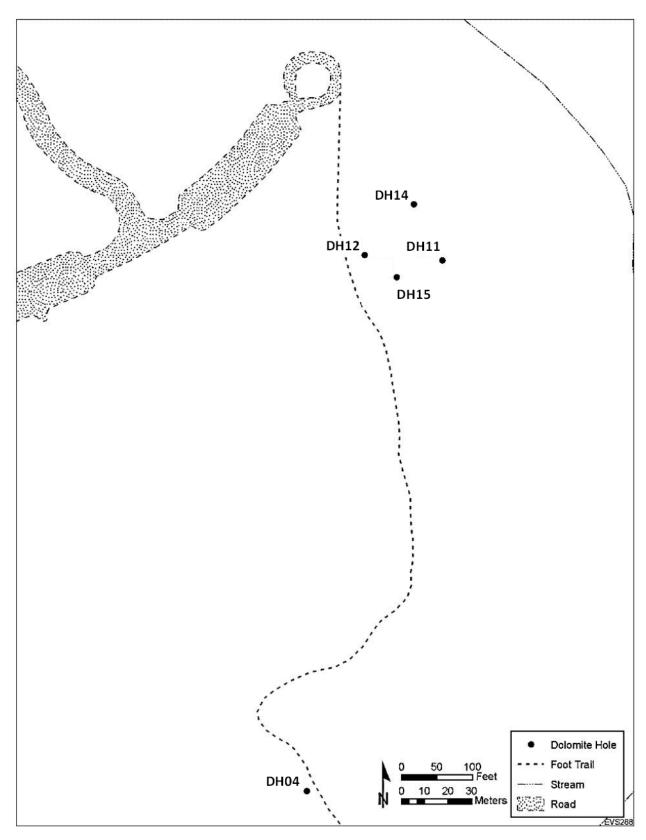


Figure 4-13 Locations of Dolomite Wells North of Plot M Table 4-9 Hydrogen-3 Content of Dolomite Well Water,

May 18, 2024

Dolomite Well Number	Hydrogen-3 Concentrations in nCi/L
DH03	0.52
DH04	$0.77 (0.77)^{1}$
DH11	0.26
DH12	0.33
DH14	0.35
DH15	1.73

<sup>&</sup>lt;sup>1</sup> Duplicate QC sample results are denoted in parentheses.

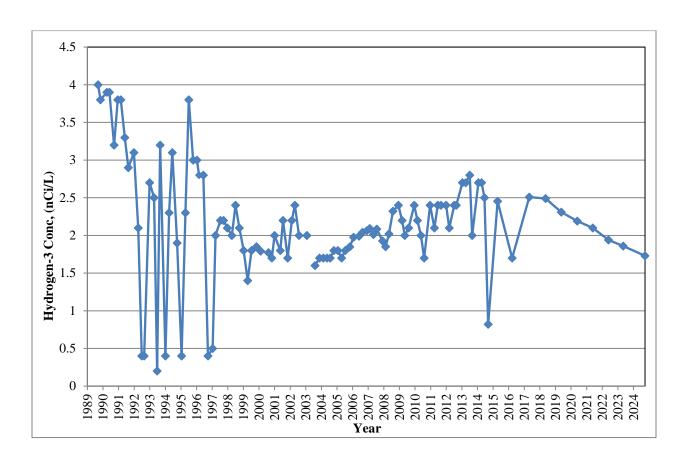


Figure 4-14 Hydrogen-3 Concentrations in Dolomite Well DH15

Water levels were measured in the dolomite wells, as shown in Table 4-10. Since these wells are installed in the dolomite aquifer, which is much deeper than the glacial till and not affected as much by recent weather, the groundwater elevations showed less seasonal variation than what was observed in the shallow glacial till wells. The groundwater elevations were consistent with historical measurements in these wells.

Since four dolomite wells (DH11, DH12, DH14, and DH15) in this area are located very close to one another, it is not possible to use groundwater elevation information to develop groundwater potentiometric surface maps. However, the relative elevation of the groundwater surface in the wells indicates that the groundwater is moving towards the nearby canal/river system, as described in the 1994 IT report<sup>42</sup>, which concluded that groundwater in this area is moving towards the Des Plaines River Valley.

#### 4.5 Red Gate Woods Former Picnic Wells

Sampling was conducted once during CY2024 at two former forest preserve picnic wells (#5160 and #5159) located north of Plot M, as shown in Figure 2-2. The Red Gate Woods North Well (#5160) was disabled in 1999 by removing the pump handle, due to high fecal coliform bacteria levels. The well opposite Red Gate Woods (#5159) is located within an undeveloped area of the forest preserve, south of Red Gate Woods parking area and north of Archer Avenue and is unusable as a water source since the pump handle has also been removed. Samples were collected in October of CY2024 from Picnic wells #5160 and #5159 and were analyzed for hydrogen-3, with the results listed in Table 4-11. The maximum and historical average hydrogen-3 concentrations since 1996 for wells #5160 and #5159 are presented in Table 4-12. The change in hydrogen-3 concentrations in these wells since 1992 is shown in Figure 4-15.

In previous sampling events, the hydrogen-3 concentration in well #5160 was similar to the concentrations observed since 2008. For unknown reasons, the hydrogen-3 levels in this well increased between 2010 and 2013, after experiencing a significant decrease in 2009. The CY2024 sample collected from well #5159 contained a concentration of hydrogen-3 similar to the previous years. The concentrations of hydrogen-3 in these picnic wells are below the State of Illinois Groundwater Quality Standard of 20 nCi/L. Following the Environmental Monitoring Program schedule, these picnic wells are scheduled to be sampled again in CY2026.

Table 4-10 Water Level Measurements in Dolomite Wells, October 2, 2024

	Ground Surface	Top of Casing		
Well Number	Elevation (ft. AMSL)	Elevation (ft. AMSL) <sup>1</sup>	Depth to water (ft.)	Water Surface Elevation (ft. AMSL)
DH03	678.10	679.50	98.28	581.22
DH04	673.80	674.60	93.42	581.18
DH11	655.36	656.90	76.20	580.70
DH12	650.34	651.60	77.31	574.29
DH14	651.43	653.20	72.29	580.91
DH15	659.14	660.80	79.90	580.90

<sup>&</sup>lt;sup>1</sup> From 1994 IT Study report. AMSL = Above Mean Sea Level.

Table 4-11 Hydrogen-3 Content of Former Picnic Wells Near Site A/Plot M, October 10, 2024

Date Collected	Hydrogen-3 Concentrations in nCi/L
Opposite Red Gate #5159	0.078
Red Gate North #5160	0.66

**Table 4-12 Hydrogen-3 Concentrations in the Red Gate Woods Wells** 

		Red Gate Woods North (#5160)		Red Gate Woods #5159)
Year	Maximum (nCi/L)	Annual Average (nCi/L)	Maximum (nCi/L)	Annual Average (nCi/L)
1996	2.19	1.56	0.55	0.33
1997	1.26	1.00	1.13	0.35
1998	1.23	1.03	0.72	0.47
1999	1.22	1.07	2.14	0.45
2000	1.54	1.33	2.20	0.70
2001	1.59	1.49	0.27	0.16
2002	1.47	1.04	3.17	0.45
2003	1.78	1.06	1.49	0.43
2004	1.08	1.00	0.34	0.17
2005	1.01	0.95	0.34	0.19
2006	1.14	1.06	2.63	1.11
2007	1.45	1.28	0.66	0.33
2008	1.24	0.33	0.32	0.26
2009	0.13	0.10	0.50	0.33
2010	0.28	0.19	0.51	0.34
2011	0.91	0.67	3.60	1.10
2012	2.10	1.60	0.74	0.34
2013	2.24	2.14	0.75	0.35
2014	2.02	1.96	0.55	0.37
2015	1.92	_a	0.51	-
2016	1.71	-	1.16	-
2017	1.28	-	0.70	-
2018	1.33	-	0.48	-
2019	0.80	-	0.20	-
2020	NS <sup>b</sup>	-	0.31	-
2021	0.80	-	0.20	-
2022	0.78	-	0.28	-
2023	0.73	-	0.37	-
2024	0.66	-	0.078	-

<sup>&</sup>lt;sup>a</sup> Annual sampling frequency started in 2015.

<sup>&</sup>lt;sup>b</sup> NS-No sample; well not operational.

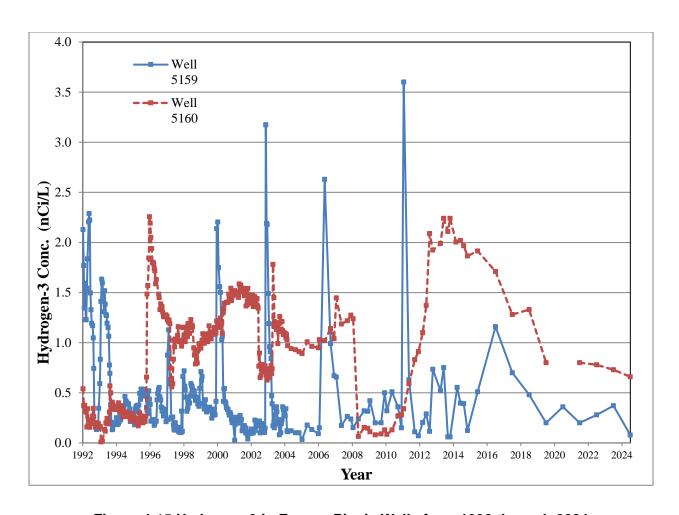


Figure 4-15 Hydrogen-3 in Former Picnic Wells from 1992 through 2024

#### 5.0 SUMMARY OF POTENTIAL RADIATION DOSE AND RISK ESTIMATES

#### 5.1 Dose Estimates

Since there is no human consumption of water from surface water or wells, the radioactive material present in this area does not represent a health risk to the public. However, to evaluate the theoretical risk to health from residual contamination if this water were to be consumed by an individual, the potential radiation dose to a hypothetical individual was estimated using methodology prescribed in DOE Order O 458.1.43 The committed effective dose equivalent from consumption of water was estimated by calculating the total quantity of hydrogen-3 potentially ingested. Taking a very conservative approach, it was assumed the hypothetical individual drank only surface water containing hydrogen-3 at the maximum levels found at Plot M (Stream Location 6) during CY2024. The concentration of hydrogen-3 was multiplied by the general public water ingestion rate of 730 L/y.44 This annual intake was then multiplied by the 50-year Committed Effective Dose Equivalent (CEDE) factor. 45 The CEDE for hydrogen-3 in water is 7.2 x 10<sup>-5</sup> rem/µCi (based on the derived concentration standard of 1.9 x 10<sup>-3</sup> µCi/mL). The worst case annual dose based on the CY2024 maximum concentration of 13.99 nCi/L was determined to be 0.74 mrem/y. A similar dose calculation was made for the former Red Gate Woods North picnic well (#5160), assuming this was the sole source of water consumed. For this well, based on the CY2024 maximum concentration of 0.66 nCi/L, the estimated dose was 0.035 mrem/y. These estimated doses are shown in Table 5-1. The DOE dose limit for the public is 100 mrem/y, so even under a highly conservative and unlikely scenario, the potential dose is far below DOE limits.

A more realistic estimation was made based upon the scenario of an occasional visitor to the Plot M area. The doses from this potential exposure were estimated by assuming a visitor drinks one liter of water from Stream Location 6 and one liter of water from the Red Gate Woods North (#5160) picnic well, combining the two doses. The results are shown in Table 5-2. The total maximum estimated dose was 0.00105 mrem per visit. To put the doses into perspective with other types of radiation exposure, comparisons can be made to annual average doses received by the public from natural or other generally accepted sources of radiation.<sup>46</sup> These are listed in Table 5-3. It is obvious that the magnitude of the doses potentially received near Plot M from radioactive substances are insignificant compared to other common sources.

#### 5.2 Risk Estimates

The potential for possible negative health effects from radiation doses received from Plot M were estimated, to gain another perspective on interpreting the effects of radiation. Estimates for carcinogenic risk, the risk of contracting cancer from these exposures, are included in Table 5-1 and Table 5-2. Based on the BIER V report. 47 a dose of one mrem/y equates to an increased cancer risk of 7 x 10<sup>-7</sup>. This conversion ratio is used to estimate incremental risk of contracting cancer from radiation exposure. For example, a carcinogenic risk of 10<sup>-7</sup> would mean, on average, one additional person out of 10,000,000 contracts cancer assuming all individuals are under the assumed exposure conditions. The EPA environmental protection standards are based upon an acceptable risk between 10<sup>-4</sup> and 10<sup>-6</sup>. Table 5-1 indicates that under a very conservative assumption of ingestion of only Plot M surface water containing hydrogen-3 at the maximum concentration of 13.99 nCi/L, the estimated maximum carcinogenic risk is 5.15 x 10<sup>-7</sup>, which is consistent with EPA standards. Table 5-1 also displays the carcinogenic risk of 2.43 x 10<sup>-8</sup> that is calculated from the hydrogen-3 concentration of 0.66 nCi/L found in Red Gate Woods North (#5160). Table 5-2 shows that the hypothetical total maximum dose of 0.00105 mrem/visit to an occasional visitor would result in an increased maximum carcinogenic risk of about 7.38 x 10<sup>-10</sup>. The incremental risk from exposure to radionuclides at Plot M can be compared to the risk associated with various life events. Examples are shown in Table 5-4. The risk from naturally occurring sources of radioactivity listed in Table 5-3 is estimated to bring about one additional individual that contracts cancer in a population of 4,600. The incremental risk from residual contamination at Site A/Plot M, under even the most conservative assumptions, is low. The monitoring program results have demonstrated that the impact of radioactivity at Site A/Plot M is very low and does not endanger the health of those living in the area or visiting the site.

Table 5-1 Hypothetical Dose from Exposure to Hydrogen-3, 2024

	Max	imum	Maximum
Assumed Source	Conc. Dose <sup>1</sup> (nCi/L) (mrem/y)		Carcinogenic Risk
Surface Water			
Plot M Location 6	13.99	0.74	5.15 x 10 <sup>-7</sup>
Well Water			
Red Gate Woods North (#5160)	0.66	0.035	2.43 x 10 <sup>-8</sup>

<sup>&</sup>lt;sup>1</sup> DOE Dose limit is 100 mrem/year

Table 5-2 Hypothetical Dose Hydrogen-3 Exposures to a Casual Visitor, 2024

Pathway	Maximum Dose <sup>1</sup> (mrem/visit)	Maximum Carcinogenic Risk
Surface Water		
Plot M Location 6	0.001	7.05 x 10 <sup>-10</sup>
Well Water		
Red Gate Woods North (#5160)	0.00005	3.33 x 10 <sup>-11</sup>
Total	0.00105	7.38 x 10 <sup>-10</sup>

<sup>&</sup>lt;sup>1</sup> DOE Dose limit is 100 mrem/year

Table 5-3 Annual Average Dose Equivalent in the U. S. Population

Sources <sup>1</sup>	Dose (mrem)
Natural Sources Radon Internal (40K and 226Ra) Cosmic Terrestrial	228 29 33 21
Medical Computed Tomography Nuclear Medicine Interventional Fluoroscopy Conventional Radiography & Fluoroscopy	147 77 43 33
Consumer (All Sources) Building Materials Commercial Air Travel Cigarette Smoking Mining and Agricultural Combustion of Fossil Fuels Highway and Road Construction Materials Glass and Ceramics	13
Industrial (All Sources)  Nuclear-power Generation  DOE Installations  Decommissioning and Radioactive Waste Industrial, Medical, Educational, and Research Activities  Contact with Nuclear-medicine Patients  Security Inspection Systems	0.3
Occupational (All Sources)  Medical Aviation Commercial Nuclear Power Industrial and Commercial Education and Research Government, DOE, and Military	0.5
Total	624

<sup>&</sup>lt;sup>1</sup>NCRP report No. 160.<sup>48</sup>

**Table 5-4 Annual Risk of Death from Various Events** 

Cause	Risk
Earthquake	1.03 x 10 <sup>-7</sup>
Flood	1.12 x 10 <sup>-7</sup>
Storm	3.70 x 10 <sup>-7</sup>
Firearms	1.2 x 10 <sup>-6</sup>
Motorcycle	1.6 x 10 <sup>-5</sup>
Walking	2.4 x 10 <sup>-5</sup>
Driving	2.07 x 10 <sup>-5</sup>
Drug Poisoning	2.5 x 10 <sup>-4</sup>

Source: Insurance Information Institute, CDC, 2020

#### 6.0 QUALITY ASSURANCE PROGRAM

The radiological instrumentation used in this program is calibrated with standardized sources obtained from or traceable to the U. S. National Institute of Standards and Technology (NIST). Calibration of the instrumentation is verified by using secondary counting standards prior to the analysis of the samples. Approximately 10% of the samples are analyzed in duplicate or with the addition of known amounts of a radionuclide to check precision and accuracy.

Argonne participates in the DOE Mixed-Analyte Performance Evaluation Program (MAPEP). The MAPEP is administered by the DOE Radiological and Environmental Sciences Laboratory (RESL), located in Idaho Falls, Idaho. RESL provides an unbiased technical component to DOE oversight of contractor operations at DOE facilities and sites. RESL conducts cost-effective measurement quality assurance programs that help assure that key DOE missions are completed in a safe and environmentally responsible manner. By assuring the quality and stability of key laboratory measurement systems throughout DOE, and by providing expert technical assistance to improve those systems and programs, it assures the reliability of data on which decisions are based. The primary objective of this performance evaluation program is to foster reliability and credibility for the analytical results used in the decision-making process, particularly as it relates to the environment and public health and safety. MAPEP checks for specific analytical proficiencies in radiological, stable inorganic, or organic analyses. The MAPEP study addresses data quality requirements in DOE Order O 458.1, "Radiation Protection of the Public and the Environment."

MAPEP studies are conducted each February and August. MAPEP samples include water, soil, and air filter matrices that are spiked with environmentally important stable inorganic, organic, and radioactive constituents that are traceable to the National Institute of Standards and Technology. RESL performs sample preparation, distribution, data evaluation, and reporting. The 2024 Argonne MAPEP study resulted in H-3 and Sr-90 analyses being within the MAPEP acceptable range.

Many factors enter into an overall quality assurance program other than the analytical laboratory quality control process discussed above. Representative sampling is of prime importance. Appropriate sampling protocols are followed for each type of sample being collected. Water samples are pre-treated in a manner designed to maintain the integrity of the constituent of interest. For example, samples collected for strontium-90 analysis are filtered and acidified

immediately after collection to prevent hydrolytic loss of metal ions and reduce leaching from suspended solids. Samples collected for hydrogen-3 analysis do not require filtration or acidification.

To ensure groundwater samples are representative of the in-place groundwater, stagnant water in the well is removed prior to sampling in accordance with USEPA guidance.<sup>50</sup> The volume of stagnant water in the casing is determined by measuring the water depth from the surface. From one to three times the well volume is removed. After the well refills with groundwater, it is sampled by bailing with a Teflon bailer or dedicated pump. Wells that do not recharge quickly are pumped nearly dry and allowed to refill before samples are collected. The Red Gate Woods dolomite wells are not purged since they are open boreholes drilled into the bedrock where stagnant water does not accumulate. All samples are placed in pre-cleaned bottles, labeled, filtered, and preserved (strontium-90 samples only). All sampling equipment is cleaned by field rinsing with Type II deionized water. New equipment is used whenever possible to prevent cross-contamination. The samples are transferred to the analytical laboratory, accompanied by a chain-of-custody transfer document.

## 6.1 <u>Applicable Standards</u>

The standard relevant to this study is the DOE Order O 458.1, "Radiation Protection of the Public and the Environment," which established a total effective dose limit of 100 mrem/y. <sup>43</sup> The dose limit and dose calculation methodology are applicable to all media: surface water, deep holes, boreholes, and picnic well water. The EPA drinking water standard <sup>44</sup> is not applicable to the picnic wells since they do not meet the definition of a public water system; however, the IEPA standard of 20 nCi/L for hydrogen-3 and the IEPA Class I groundwater standard of 8 pCi/L for strontium-90 are used in this report for comparison purposes.

#### 6.2 Analytical Methods

The analytical methods used to obtain the data in this report are identical to those used to generate the results presented in ANL-24/01.<sup>56</sup>

#### 6.3 Intercomparison Program

Commencing in 2012, Argonne has participated in a program of dividing a subset of the Site A/Plot M water samples collected and submitting one half of each sample to the IEMA for analysis. The IEMA operates a laboratory which conducts radiological analyses using methods similar to Argonne. Duplicate sets of six samples collected are analyzed by both Argonne and the IEMA for hydrogen-3. Duplicate sets of three samples are analyzed by both Argonne and IEMA personnel for strontium-90. The results are compared to identify any discrepancies that may be occurring within the processes being conducted by the two analytical laboratories that would affect the results. The results from the CY2024 split samples are shown in Tables 6-1 and 6-2. The relative percent difference (RPD) for hydrogen-3 results from pairs of samples exhibiting results greater than three times the minimum detectable activity (MDA) is shown in Table 6-1.

Table 6-1 Intercomparison Sample Hydrogen-3 Results for 2024

Sampling Location	Argonne H-3 Results (nCi/L)	Argonne Uncertainty	Argonne MDA	IEMA H-3 Results (nCi/L)	IEMA Uncertainly	IEMA MDA	RPDª
Third Quarter							
Plot M Borehole BH04	245	0.644	0.1	252	NA	0.123	2.8%
Plot M Borehole BH10	22.9	0.197	0.1	21.4	NA	0.123	6.8%
Fourth Quarter							
RGW Dolomite Well DH11	0.256	0.044	0.1	0.284	NA	0.123	-
RGW Dolomite Well DH12	0.329	0.045	0.1	0.372	NA	0.123	12.3%
RGW Well 5160	0.657	0.051	0.1	0.679	NA	0.123	3.3%
Site A Borehole BH56	0.592	0.051	0.1	0.520	NA	0.123	12.9%

a Relative Percent Difference (RPD) was calculated only for those results where both Argonne and IEMA results were greater than three times the MDA

Table 6-2 Intercomparison Sample Strontium-90 Results for 2024

Sampling Location	Argonne Sr-90 Results (pCi/L)	Argonne Uncertainty	Argonne MDA	IEMA Sr-90 Results (pCi/L)	IEMA Uncertainly	IEMA MDA
Third Quarter						
Plot M Borehole BH4	0.008	0.055	0.25	0.38	NA	1.47
Plot M Borehole BH10	0.083	0.060	0.25	0.08	NA	1.71
Fourth Quarter						
Site A Borehole BH56	1.27	0.176	0.25	2.85	NA	1.53

<sup>&</sup>lt;sup>a</sup> IEMA uncertainty was not available for Strontium-90 results

<sup>&</sup>lt;sup>b</sup> Bold font indicates the result is greater than three times the MDA

<sup>&</sup>lt;sup>c</sup> IEMA uncertainty was not available for all Hydrogen-3 results

#### 7.0 2025 ANNUAL INSPECTION REPORT FOR SITE A AND PLOT M

#### 7.1 EXECUTIVE SUMMARY

The Site A/Plot M Decommissioned Reactor Site was inspected on May 1, 2025. Site A/Plot M is in the Palos Area Preserves, operated by the Forest Preserve District of Cook County. The site was found to be in good condition with negligible erosional concerns across the grass covered mound at Plot M. Landscaping timbers installed along the footpath of Plot M have been effective in reducing erosion down the eastern slope, thus, no additional timber steps are needed at this time. The installation of small rocks may help with some of the minor erosion along the sides of the timber steps. The bike trail, installed by the Forest Preserve District of Cook County, located to the south and east of Plot M has helped to significantly reduce traffic at the site. The Site A and Plot M monuments were both replaced on May 1, 2021, and remain in good condition. All groundwater monitoring wells at Site A/Plot M were found to be secure and in good condition, with two wells requiring minor maintenance. Dolomite well DH11, located north of Plot M, had some of its labeling chipped off and Plot M well BH10's label was difficult to read. The flagging denoting the location of dolomite well DH04 was noted as having no indication that it belonged to Argonne.

## 7.2 <u>Annual Inspection Background</u>

This report presents the findings of the 2025 annual inspection of the Site A/Plot M, Illinois, Decommissioned Reactor Site at the Palos Forest Preserve in Cook County, Illinois. Features and photographed locations discussed regarding the inspection are shown on maps in Sections 3.0 and 4.0 of this report.

Argonne conducted the site inspection on May 1, 2025. The DOE-LM contracts directly with Argonne for all environmental sampling, analysis, and reporting. This DOE-LM site located in the Cook County Forest Preserve is open to the public and was found to be in good condition as documented in this inspection report.

The inspection was conducted in accordance with the "Long-Term Surveillance and Maintenance Plan, Site A and Plot M, Palos Forest Preserve, Cook County, Illinois" approved in August of 2024<sup>57</sup>. This plan superseded the previous Long-Term Surveillance and Maintenance Plan of January 2015<sup>37</sup>. The purposes of the inspection were to look for evidence that the integrity of the disposal site is not threatened, evaluate the condition of the monuments, locate and assess the condition of the Plot M corner markers, determine whether maintenance is needed, and examine the condition of the DOE-LM monitoring wells.

#### 8.0 INSPECTION RESULTS

Two employees from Argonne conducted the annual site inspection of Site A and Plot M Additionally, two representatives from the IEMA, three representatives from the Forest Preserve District of Cook County, and one representative from DOE-LM, were in attendance.

The inspectors from Argonne and the attendees convened at the Red Gate Woods parking area at 0900 hours on May 1, 2025 and reviewed the agenda for the day and discussed safety topics relevant to the inspection. Figure 8-1 shows the agenda for the day, and Figure 8-2 shows the Site A/Plot M 2025 Annual Field Attendance Sheet. Maps containing the locations of the inspection areas, as shown in the CY2024 Surveillance portion of this report, were distributed to the attendees. Conditions were slightly rainy and overcast with temperatures in the mid to upper 60 degrees Fahrenheit at the time of the inspection. Potential safety concerns such as forest overgrowth, the rainy conditions, and trip hazards were discussed prior to beginning the annual inspection. During the inspection, photographs were taken by the Argonne inspection team of the various monitoring wells and the monuments at Site A and Plot M. These photographs are shown in Section 10.0.

Personnel in attendance from the Forest Preserve District of Cook County requested that well coordinates be shared between the groups so locations can be easily identified, and invasive species control efforts will not hinder Argonne operations. This finding is noted as an improvement opportunity in Section 9.0 of this report.

#### 8.1 Red Gate Woods

Six dolomite wells, shown in Photographs P12-P17, were all locked and intact and in good condition with all well numbers on the outer casing. It was noted that dolomite well DH11's label was chipping off. This finding is noted as an improvement opportunity in Section 9.0 of this report. One of these wells is located near Plot M, and the remaining five are located north of Plot M in the Red Gate Woods area as shown in Figures 4.3 and 4.13 of this report. Forest Preserve District of Cook County personnel requested that flagging leading to dolomite well DH04 be marked with "ANL" or "Argonne" so that the owner can be easily identified. This has been noted as an improvement opportunity in Section 9.0 of this report.

#### 8.2 Plot M

All groundwater wells at Plot M were locked and intact and found to be in good condition. It was noted that borehole BH10's label was difficult to read, so the label will be reapplied for ease of future identification. This finding is noted as an improvement opportunity in Section 9.0 of this report. Photographs P01 through P09 show the various monitoring wells at Plot M.

During the time of the inspection, Plot M surface water was flowing at the four sampling locations along the two stream beds that flow around Plot M, shown in Figure 4-1 of this report and photographs P26-P29. Location 1 is upstream of the Plot M area. Locations 6, 7, and 8 are immediately north and downstream of Plot M.

The Plot M monument was replaced in May 2021. Several letters had been chiseled off the old, pre-2021 replacement monument by vandals as reported several years ago. Photograph P23 show the new monument at Plot M; it remains in good condition. All six corner markers of Plot M were located during the inspection and found to be in good condition. Photographs P19 through P22 display the Plot M corner markers that were photographed. Erosion controls have been reasonably effective with the addition of four additional landscape timbers installed in 2020 along the north trail. Any future erosion control measures will be agreed upon and coordinated with the Forest Preserve District of Cook County to better assimilate with the surrounding environment. Argonne conducts quarterly maintenance reviews of the cap and north trail.

During the inspection, it was shared by Forest Preserve District of Cook County personnel that a controlled burn had taken place in March of 2025. Vegetative cover was well established, and the controlled burns will be beneficial to maintaining healthy, well-established vegetation and preventing erosion. Argonne and DOE-LM personnel requested that they both be informed if future controlled burns are to be planned and scheduled. Notification after the burn has taken place is acceptable.

#### 8.3 Site A

The locations of the two groundwater wells at Site A are shown in Figure 4-10 of this report. Both wells, BH55 and BH56, were found to be locked and intact and in good condition, with the well numbers visible on the outer casing. Photographs P10 and P11 show the two monitoring wells, BH55 and BH56, respectively, at Site A.

The Site A monument was replaced in May 2021. Photograph P24 shows the new monument at Site A; it remains in good condition.

### Agenda for DOE Office of Legacy Management Site Visit Site A/Plot M and Argonne National Laboratory

#### Thursday, May 1, 2025

#### 8:00am-8:15am

Arrival of Melissa Lutz (DOE-Legacy Management, St. Charles, MO) to Argonne National Laboratory, Argonne Welcome Center, Building 224, at the Main Gate entrance by way of Cass Avenue.

#### 8:15am-8:30am

Melissa meets Jerry Baudino in the lobby of Bldg. 200, Chemistry Building.

#### 9:00am-11:30am

Tour and annual inspection of Site A/Plot M, led by Argonne staff members Jerry Baudino, Collin Klimek, and Dee Vanek; invited stakeholders, e.g., DOE-LM, IEMA-OHS, FPDCC, et al., may also be in attendance.

- Commence at Red Gate Woods Parking Lot at 9am.
- Discussion of Safety Topics/Plan for the Morning.
- Tour to include the various groundwater monitoring wells at Site A/Plot M; Plot M cap, Plot M Monument, Plot M corner markers, Plot M streams (if flowing); Site A Monument; and the various surface water locations.

#### 12noon-1:30pm

Lunch at Argonne, Bldg. 213 Cafeteria. Staff from EPP and AS are also invited to attend.

#### 1:30pm-2:30pm

Bldg. 200/F-Wing Meet-and-Greet of Environmental Protection Program (EPP) and Analytical Services (AS) staff; tour of Environmental Monitoring (EM) Labs; tour of Analytical Services Chemistry (ASCH) and Radiochemistry (ASRC) Labs provided by Mike Kuszewski, Analytical Services Manager, Radiological Protection (RP) Division.

#### 2:30pm-3:30pm

Tour of Argonne's History of Nuclear Reactor Development Exhibit Hall, located in Bldg. 208, and provided by Roger Blomquist, Principle Nuclear Engineer, Nuclear Science and Engineering (NSE) Division.

#### 3:30-4:30pm

Complete any unfinished business.

Follow up any discussion, questions, comments, closing remarks, and adjournment.

Figure 8-1 Site A/Plot M 2025 Annual Inspection Agenda

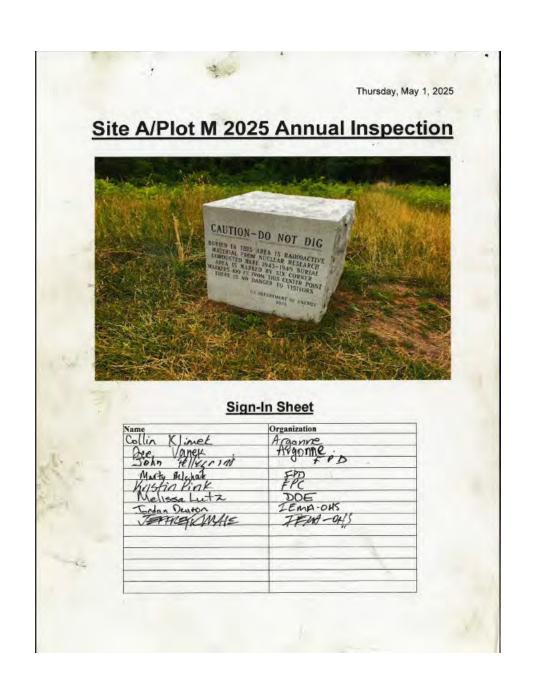


Figure 8-2 Site A Plot M 2025 Annual Field Attendance Sheet

# 9.0 INSPECTION ISSUES, IMPROVEMENT OPPORTUNITIES, AND CORRECTIVE ACTIONS

1. **Improvement Opportunity #1:** Dolomite well DH11's label was chipping off and was difficult to read.

Corrective Action: Argonne personnel procured a new label and re-labeled DH11 on 6-5-2025.

2. **Improvement Opportunity #2:** Borehole BH10's label was difficult to read due to weathering occurring to the surface of the well cap.

Corrective Action: Argonne personnel procured a new label and re-labeled BH10 on 6-5-2025.

3. **Improvement Opportunity #3:** Flagging leading to dolomite well DH04 was not clearly labelled with "ANL" or "Argonne". Forest Preserve District of Cook County personnel requested that the flagging be labelled so its owner can be readily identified.

*Corrective Action:* Argonne personnel installed new flagging and labelled it appropriately on 6-5-2025.

4. Improvement Opportunity #4: Forest Preserve District of Cook County personnel requested that well coordinates be shared between the groups so locations can be easily identified, and invasive species control efforts will not hinder Argonne operations.

Corrective Action: Argonne personnel will update coordinates during the next sampling event and will share these coordinates with Forest Preserve District of Cook County personnel.

The results of the CY2025 annual inspection cited four improvement opportunities, as noted above. The inspection results will be entered into the PRISM database, Argonne's online management tool for tracking and trending issues, opportunities for improvement, assessments, inspections, and tracked to completion.

## 10.0 INSPECTION PHOTOGRAPHS

Photograph Number Photos were taken at the time of the inspection. P01 Monitoring Well BH02 at Plot M P02 Monitoring Well BH03 at Plot M P03 Monitoring Well BH06 at Plot M P04 Monitoring Well BH09 at Plot M P05 Monitoring Well BH10 at Plot M P06 Monitoring Well BH11 at Plot M P07 Monitoring Well BH11 at Plot M P08 Monitoring Well BH26 at Plot M P09 Monitoring Well BH35 at Plot M P10 Monitoring Well BH35 at Plot M P10 Monitoring Well BH56 at Site A P11 Monitoring Well BH56 at Site A P12 Monitoring Well DH03 at Red Gate Woods P13 Monitoring Well DH04 at Red Gate Woods P14 Monitoring Well DH11 at Red Gate Woods P15 Monitoring Well DH12 at Red Gate Woods P16 Monitoring Well DH12 at Red Gate Woods P17 Monitoring Well DH14 at Red Gate Woods P18 Picnic Well 5160 at Red Gate Woods P19 Plot M Corner Marker 1 P20 Plot M Corner Marker 1 P20 Plot M Corner Marker 4 P23 Plot M Monument P24 Site A Monument P25 Bull Frog Lake Surface Water Location P26 Stream Sampling Location 6 P28 Stream Sampling Location 7 P29 Stream Sampling Location 8		B
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P13 Monitoring Well DH04 at Red Gate Woods P14 Monitoring Well DH11 at Red Gate Woods, Displaying Graffiti on Well Cap P15 Monitoring Well DH12 at Red Gate Woods P16 Monitoring Well DH14 at Red Gate Woods P17 Monitoring Well DH15 at Red Gate Woods P18 Picnic Well 5160 at Red Gate Woods P19 Plot M Corner Marker 1 P20 Plot M Corner Marker 2 P21 Plot M Corner Marker 3 P22 Plot M Corner Marker 4 P23 Plot M Corner Marker 4 P24 Site A Monument P25 Bull Frog Lake Surface Water Location P26 Stream Sampling Location 1 P27 Stream Sampling Location 7	P11	Monitoring Well BH56 at Site A
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P22 Plot M Corner Marker 4 P23 Plot M Monument P24 Site A Monument P25 Bull Frog Lake Surface Water Location P26 Stream Sampling Location 1 P27 Stream Sampling Location 6 P28 Stream Sampling Location 7	P20	Plot M Corner Marker 2
P23 Plot M Monument P24 Site A Monument P25 Bull Frog Lake Surface Water Location P26 Stream Sampling Location 1 P27 Stream Sampling Location 6 P28 Stream Sampling Location 7	P21	Plot M Corner Marker 3
P24 Site A Monument P25 Bull Frog Lake Surface Water Location P26 Stream Sampling Location 1 P27 Stream Sampling Location 6 P28 Stream Sampling Location 7	P22	Plot M Corner Marker 4
P25 Bull Frog Lake Surface Water Location P26 Stream Sampling Location 1 P27 Stream Sampling Location 6 P28 Stream Sampling Location 7	P23	Plot M Monument
P26 Stream Sampling Location 1 P27 Stream Sampling Location 6 P28 Stream Sampling Location 7	P24	Site A Monument
P27 Stream Sampling Location 6 P28 Stream Sampling Location 7	P25	Bull Frog Lake Surface Water Location
P28 Stream Sampling Location 7	P26	Stream Sampling Location 1
- 3	P27	Stream Sampling Location 6
P29 Stream Sampling Location 8	P28	Stream Sampling Location 7
	P29	Stream Sampling Location 8



P01 - Monitoring Well BH02 at Plot M



P02 – Monitoring Well BH03 at Plot M



P03 – Monitoring Well BH06 at Plot M



P04 - Monitoring Well BH09 at Plot M



P05 – Monitoring Well BH10 at Plot M



P06- Monitoring Well BH11A at Plot M



P07 - Monitoring Well BH26 at Plot M



P08 – Monitoring Well BH04 at Plot M



P09 – Monitoring Well BH35 at Plot M



P10 – Monitoring Well BH55 at Site A



P11 – Monitoring Well BH56 at Site A



P12 - Monitoring Well DH03 at Red Gate Woods



P13 - Monitoring Well DH04 at Red Gate Woods



P14 - Monitoring Well DH11 at Red Gate Woods, Displaying Graffiti on Well Cap



P15 - Monitoring Well DH12 at Red Gate Woods



P16 – Monitoring Well DH14 at Red Gate Woods



P17 - Monitoring Well DH15 at Red Gate Woods



P18 - Picnic Well 5160 at Red Gate Woods



P19 – Plot M Corner Marker 1



P20 – Plot M Corner Marker 2



P21 – Plot M Corner Marker 3



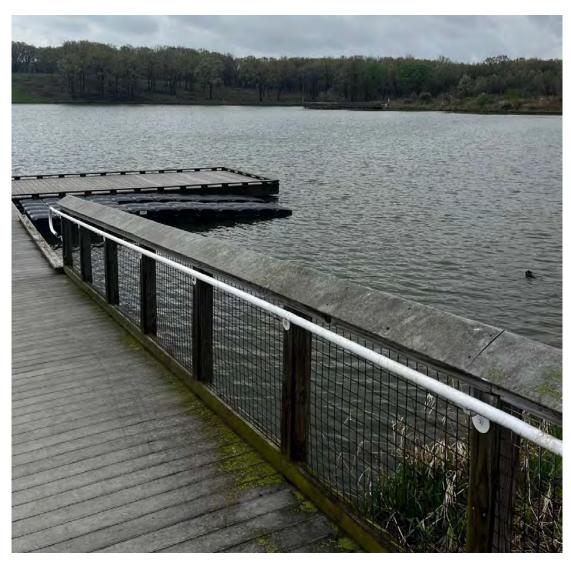
P22 - Plot M Corner Marker 4



P23 - Plot M Monument



P24 - Site A Monument



P25 – Bull Frog Lake Surface Water Location



P26 – Stream Sampling Location 1



P27 - Stream Sampling Location 6



P28 – Stream Sampling Location 7



P29 - Stream Sampling Location 8

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