The DOE has asserted that site-specific factors are relevant to an evaluation of the potential for exposure to radionuclides via ingestion. I agree. Thus, I have determined that the process for identifying the PRGs will *not* use default exposure assumptions from CWA guidance documents to determine exposures to radionuclides discharged from landfills at ORR, particularly through fish consumption. These default exposure assumptions do not take into account the site-specific