ATTACHMENT III TO IPN-01-033

OFFSITE DOSE CALCULATION MANUAL, REVISION 14

Entergy Nuclear Operations, Inc.
Indian Point 3 Nuclear Power Plant
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INFORMATION ONLY

Gray shaded areas indicate a reference to Improved Technical Specifications and are NOT effective until ITS has been fully implemented.

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INDIAN POINT 3

OFFSITE DOSE CALCULATION MANUAL

Revision 14

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23. Improved Technical Specifications

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1.0 DEFINITIONS

1.1 ACTION

That part of a Control that prescribes remedial measures required under designated conditions.

1.2 CHANNEL CALIBRATION

Adjustment of channel output such that it responds, with acceptable range and accuracy, to known values of the parameter which the channel measures. Calibration shall encompass the entire channel, including alarm or trip, and shall be deemed to include the channel functional test.

1.3 CHANNEL CHECK

A qualitative determination of acceptable operability by observation of channel behavior during operation. This determination shall include, where possible, comparison of the channel with other independent channels measuring the same variable.

1.4 CHANNEL FUNCTIONAL TEST

Injection of a simulated signal into the channel to verify that it is operable, including alarm and/or trip initiating action.

1.5 EFFLUENT CONCENTRATION

The EFFLUENT CONCENTRATION is that maximum concentration limit of each radionuclide specified in 10 CFR 20, Table 2 of Appendix B.

1.6 GASEOUS RADWASTE TREATMENT SYSTEM

A GASEOUS RADWASTE TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system offgases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

1.7 LIQUID RADWASTE TREATMENT SYSTEM

A LIQUID RADWASTE TREATMENT SYSTEM is any system designed and installed to reduce radioactive liquid effluents by collecting liquid radwaste and providing for processing capability and/or holdup for the purpose of reducing and monitoring the total radioactivity prior to release to the environment.

1.8 MAXIMUM PERMISSIBLE CONCENTRATION WATER (MPCW)

MPCW is that concentration of a radionuclide equal to 10 times the concentration of a radionuclide specified in 10 CFR 20, Appendix B, Table 2, Column 2.

1.9 MEMBER(S) OF THE PUBLIC

MEMBER(S) OF THE PUBLIC means any individual except when that individual is receiving an occupational dose.

1.10 OCCUPATIONAL DOSE

Occupational dose means the dose received by an individual in the course of employment in which the individual's assigned duties involve exposure to radiation or to radioactive material from licensed and unlicensed sources of radiation, whether in the possession of the licensee or other person. Occupational dose does not include dose received from background radiation, from any medical administration the individual has received, from exposure administered to individuals administered radioactive material and released in accordance with 35.75, from voluntary participation in medical research programs, or as a member of the public.

1.11 OFFSITE DOSE CALCULATION MANUAL (ODCM)

The OFFSITE DOSE CALCULATION MANUAL shall contain the current methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Technical Specification (Appendix A, 6.8.4) {ITS: replaced w/: 5.5.1 and 5.5.4} and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Technical Specifications (Appendix A, 4.3.2.1 and 4.3.2.2) {ITS: replaced w/: 5.6.2 and 5.6.3.

1.12 OPERABLE - OPERABILITY

Properly installed in the system and capable of performing the intended functions in the intended manner as verified by testing and tested at the frequency required by the Radiological Effluent Controls. Implicit in this definition shall be the assumption that all necessary attendant controls, electrical power source, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

1.13 PROCESS CONTROL PROGRAM (PCP)

The PROCESS CONTROL PROGRAM shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that the processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61 and 71 and Federal and State regulations and other requirements governing the disposal of solid radioactive waste. {ITS: insert: The PCP is further described in RECS 5.5}.

1.14 PURGE - PURGING

PURGE or PURGING is the controlled process of discharging air or gas from a confinement in such a manner that replacement air or gas is required to purify the confinement.

1.15 RATED THERMAL POWER (RTP)

RTP shall be a total reactor core heat transfer rate to the reactor coolant of 3025 MWt. ("Rated Power" and "Rated Thermal Power" are used interchangeably throughout the Technical Specifications).

1.16 SITE BOUNDARY

The SITE BOUNDARY (ODCM Part II, Figure 1-1) means that line beyond which the land or property is not owned, leased, or otherwise controlled by either site licensee.

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1.17 SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

1.18 THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

1.19 UNRESTRICTED AREA

An UNRESTRICTED AREA (ODCM Part II, Figure 1-1) means an area, access to which is neither limited nor controlled by the licensee.

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1.20 VENTILATION EXHAUST TREATMENT SYSTEM

A VENTILATION EXHAUST TREATMENT SYSTEM is any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal absorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

2/3.0 RADIOLOGICAL EFFLUENT CONTROLS AND SURVEILLANCE REQUIREMENTS

2.1 Radioactive Liquid Effluent Monitoring Instrumentation

CONTROL:

In accordance with Technical Specification (6.8.4.a.1) {ITS: replaced w/: 5.5.4}, the radioactive liquid effluent monitoring instrumentation channels shown in Table 2.1-1 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Control 2.3.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: As shown in Table 2.1-1.

ACTION:

A. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Control, immediately suspend the release of radioactive liquid effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.

B. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 2.1-1. Exert best efforts to return the instruments to OPERABLE status within 30 days and if unsuccessful, explain in the next Annual Radioactive Effluent Release Report, pursuant to (Reporting Requirement 5.1) {ITS: replaced w/: RECS 5.2}, why the inoperability was not corrected within this time frame.

C. Report all deviations in the Annual Radioactive Effluent Release Report.

3.1 SURVEILLANCE REQUIREMENTS:

Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in
Table 3.1-1.

TABLE 2.1-1

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION		
INSTRUMENT	**MINIMUM CHANNELS OPERABLE***	**ACTION**
1. GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE		
a. Liquid Radwaste Effluent Line** (R-18 and R-61)	(1)	1
b. Steam Generator Blowdown Effluent Line (R-19)	(1)	2
2. GROSS BETA OR GAMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
a. Service Water System Effluent Line (R-16A, R-16B, R-23)	(1)	3
3. FLOW RATE MEASUREMENT DEVICES		
a. Liquid Radwaste Effluent Line	(1)	4
b. Steam Generator Blowdown Effluent Line	(1)	4
4. RADIOACTIVITY RECORDERS***		
a. Liquid Radwaste Effluent Line	(1)	1
b. Steam Generator Blowdown Effluent Line	(1)	2
5. TANK LEVEL INDICATING DEVICES****		
a. Refueling Water Storage Tank	(1)	5
b. Primary Water Storage Tank	(1)	5
c. Monitor Tank #31	(1)	5
d. Monitor Tank #32	(1)	5

TABLE 2.1-1 *(Continued)*

TABLE NOTATION

* During release by the pathway, channels shall be OPERABLE and in service during such release on a continuous, uninterrupted basis. Except that outages are permitted, within the time frame and limitations of the specified action, for the purpose of maintenance of required tests, checks and calibration.

** The condensate polisher regenerative waste release path does not need to be monitored unless a primary to secondary side leak is present.

*** Required only if alarm/trip set point is based on recorder-controller.

**** Tanks included in this Control are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

TABLE 2.1-1 *(Continued)*

TABLE NOTATION

ACTION 1 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases may continue provided that prior to initiating a release:

a. At least two independent samples are analyzed in accordance with Radiological Effluent Control Surveillance Requirement 3.3.1.A,

and

b. At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge line valving:

Otherwise, suspend release of radioactive effluents via this pathway.

ACTION 2 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are analyzed either for principal gamma emitters or for gross radioactivity (beta or gamma) at a lower limit of detection of at least 5E-7 microcurie/ml (as Cs-137):

a. At least once per 12 hours when the specific activity of the secondary coolant is greater than 0.01 microcurie/gram DOSE EQUIVALENT I-131.

b. At least once per 24 hours when the specific activity of the secondary coolant is less than or equal to 0.01 microcurie/gram DOSE EQUIVALENT I-131.

ACTION 3 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided that, at least once per 12 hours, grab samples are collected and analyzed for gross radioactivity (beta or gamma) at a lower limit of detection of at least 5E-7 microcurie/ml (as Cs-137).

ACTION 4 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours during actual releases. Pump performance curves may be used to estimate flow.

ACTION 5 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, liquid additions to this tank may continue provided the tank liquid level is estimated during all liquid additions to the tank.

TABLE 3.1-1

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS				
INSTRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
1. GROSS RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE				
a. Liquid Radwaste Effluent Line (R-18 and R-61*****)	D*	D*	24M(3)	Q(1)*
b. Steam Generator Blowdown Effluent Line (R-19)	D*	M*	24M(3)	Q(1)*
2. GROSS BETA OR GAMMA RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE				
a. Service Water System Effluent Line (R-16A and R-16B)	D*	M*	24M(3)	Q(2)*
b. Service Water System Effluent Line (R-23)	D*	M*	18M(3)	Q(2)*
3. FLOW RATE MEASUREMENT DEVICES				
a. Liquid Radwaste Effluent Line	D(4)	N.A.	18M	Q
b. Steam Generator Blowdown Effluent Line	D(4)	N.A.	24M	N.A.
4. RADIOACTIVITY RECORDERS				
a. Liquid Radwaste Effluent Line	D*	N.A.	24M	Q****
b. Steam Generator Blowdown Effluent Line	D*	N.A.	24M	Q****
5. TANK LEVEL INDICATING DEVICES***				
a. Refueling Water Storage Tank	D**	N.A.	18M	18M
b. Primary Water Storage Tank	D**	N.A.	24M	24M
c. Monitor Tank #31	D**	N.A.	18M	18M
d. Monitor Tank #32	D**	N.A.	18M	18M

TABLE 3.1-1*(Continued)*

TABLE NOTATION

* When this pathway is utilized for releases, with frequency no more than indicated.

** During liquid additions to the tank.

*** Tanks included in this Control are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

**** Required only if alarm/trip setpoint is based on recorder-controller.

***** The condensate polisher regenerative waste release path does not need to be monitored unless a primary to secondary leak is present.

(1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if the following condition exists:

1. Instrument indicates measured levels above the alarm/trip setpoint.

(2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm setpoint.

2. Instrument controls not set in operate mode.

(3) Radioactive calibration standards used for CHANNEL CALIBRATIONS shall be traceable to the National Institute of Standards and Technology (NIST) or an aliquot of calibration solution shall be analyzed with instrumentation which is calibrated with NIST traceable standards. (Standards from suppliers who participate in measurement assurance activities with NIST are acceptable).

(4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

Periodicity Abbreviations

D	Daily
M	Monthly
Q	Quarterly
N.A.	Not Applicable
18M	At least once per 18 months.
24M	At least once per 24 months.

2.2 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

CONTROL:

In accordance with Technical Specification (6.8.4.a.1) {ITS: replaced w/: 5.5.4}, the radioactive gaseous effluent monitoring instrumentation channels shown in Table 2.2-1 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Control 2.4.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

APPLICABILITY: As shown in Table 2.2-1.

ACTION:

A. With a radioactive gaseous effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Control, immediately suspend the release of radioactive gaseous effluents monitored by the affected channel or declare the channel inoperable, or change the setpoint so it is acceptably conservative.

B. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 2.2-1. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Annual Radioactive Effluent Release Report, pursuant to (Reporting Requirement 5.1) {ITS: replaced w/: RECS 5.2}, why the inoperability was not corrected within this time frame.

C. Report all deviations in the Annual Radioactive Effluent Release Report.

3.2 SURVEILLANCE REQUIREMENTS:

Radioactive gaseous effluent monitoring instrumentation channels shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 3.2-1.

TABLE 2.2-1

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION			
INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
1. WASTE GAS HOLDUP SYSTEM			
a. Noble Gas Activity Monitor-Providing Alarm (R-20)	(1)	**	6
2. CONDENSER AIR EJECTOR			
a. Noble Gas Activity Monitor (R-15)	(1)	*	8
3. ENVIRONMENTAL RELEASE POINTS (PLANT VENT***, ADMIN. BUILDING, CONTROLLED AREA, RAD MACHINE SHOP)			
a. Noble Gas Activity Monitor (R-14, R-27, R-46 and R-59)	(1)	*	{ITS: 8,11,12}
b. Iodine Sampler	(1)	*	10
c. Particulate Sampler	(1)	*	10
d. Flow Rate Monitor	(1)	*	7
e. Sampler Flow Rate Monitor	(1)	*	7
4. CONTAINMENT PURGE SYSTEM			
a. Containment Noble Gas Activity - Monitor (R-12) Providing Alarm and Automatic Termination of Release	(1)	*	9

TABLE NOTATION

* Channels shall be OPERABLE and in service on a continuous basis during release via this pathway, except that outages are permitted, within the time frame of the specified action for the purpose of maintenance and performance of required tests, checks and calibrations.

** During waste gas holdup system operation (treatment for primary system offgases).

*** The Plant Vent will also monitor releases from the Vent Header, Auxiliary Building Vents, Fuel Storage Building Vents, and the Rad Waste Area Vent.

TABLE 2.2-1 *(Continued)*

ACTION 6 - With the number of channels OPERABLE less than that required by the Minimum Channels OPERABLE requirement, the radioactive content of the receiving gas decay tank shall be determined daily to ensure compliance with RECS 2.11.

ACTION 7 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours.

ACTION 8 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are taken at least once per 12 hours and these samples are analyzed for gross activity within 24 hours.

ACTION 9 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, immediately suspend PURGING of radioactive effluents via this pathway. During containment building ventilation in the cold shutdown condition, continuous monitoring and automatic termination of release is not required. One continuous monitor at the final release point (plant vent) is sufficient.

ACTION 10 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the effected pathway may continue provided samples are continuously collected with auxiliary sampling equipment as required in Table 3.4-1.

ACTION 11 - With the number of channels OPERABLE less than that required by the Minimum Channels OPERABLE requirement for the plant vent, the contents of the radwaste gas decay tanks may be released to the environment provided that prior to initiating the release:

a. At least two independent samples of the tank contents are analyzed, AND,

b. At least two technically qualified members of the facilities staff independently verify the release rate calculations and discharge valve lineup.

{ITS: Insert:

ACTION 12 - If the plant vent sampling capability or the wide-range vent monitor (R-27) is/are determined to be inoperable when the reactor is above the cold shutdown condition, then restore the sampling/monitoring capability within 72 hours or:

a. Initiate a pre-planned alternate sampling/monitoring capability as soon as practical, but no later than 72 hours after identification of the failures. If the capability is not restored to operable status within 7 days, then,

b. Submit a Special Report to the NRC pursuant to Technical Specification 5.6.7, and Technical Reference Manual 3.3.C within 14 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system.}

TABLE 3.2-1

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS					
INSTRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
1. WASTE GAS HOLDUP SYSTEM					
a. Noble Gas Activity Monitor Providing Alarm (R-20)	D	M	24M(2)	Q(1)**	*
2. CONDENSER AIR EJECTOR					
a. Noble Gas Activity Monitor (R-15)	D	M	24M(2)	Q(1)**	*
3. ENVIRONMENTAL RELEASE POINTS (PLANT VENT, ADMIN. BUILDING CONTROLLED AREA VENT, RAD MACHINE SHOP VENT)					
a. Noble Gas Activity Monitor (R-14, R-27, R-46, and R-59)	D	M	24M(2)	Q(1)**	*
b. Iodine Sampler	W	N.A.	N.A.	N.A.	*
c. Particulate Sampler	W	N.A.	N.A.	N.A.	*
d. Flow Rate Monitor	D	N.A.	18M	Q	*
e. Sampler Flow Rate Monitor	D	N.A.	18M	N.A.	*
4. CONTAINMENT PURGE SYSTEM					
a. Containment Noble Gas Activity Monitor (R12) providing Alarm and Automatic Termination of Release	D	M	24M(2)	Q(1)**	*

TABLE NOTATION

* Surveillance is required at all times except when monitor has been removed from service in accordance with Table 2.2-1.

** Will not include operation of automatic control functions.

TABLE 3.2-1*(Continued)*

(1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm setpoint.

2. Instrument controls not set in operate mode.

(2) Radioactive Calibration Standards used for CHANNEL CALIBRATIONS shall be traceable to the National Institute of Standards and Technology (NIST) or an aliquot of calibration gas shall be analyzed with instrumentation which is calibrated with NIST traceable standards (standards from suppliers which participate in measurement assurance activities with NIST are acceptable).

D	Daily
M	Monthly
N.A.	Not Applicable
Q	Quarterly
18M	At least once per 18 months.
24M	At least once per 24 months.

2.3 RADIOACTIVE LIQUID EFFLUENTS

2.3.1 LIQUID EFFLUENT CONCENTRATION

CONTROL:

In accordance with Technical Specifications (6.8.4.a.2 and 6.8.4.a.3) {ITS: replaced w/: 5.5.4}, the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS shall be limited to 10 times the EFFLUENT CONENTRATION values specified in Appendix B, Table 2, Column 2 to 10CFR20 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2E-4 microcuries/ml.

APPLICABILITY: At all times.

ACTION:

With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, immediately restore the concentration to within these limits.

3.3.1 SURVEILLANCE REQUIREMENTS:

A. Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 3.3.1-1.

B. The results of the radioactivity analyses shall be used in accordance with the methodology and parameters in the ODCM to assure that the concentrations at the point of release are maintained within the limits of Control 2.3.1.

TABLE 3.3.1-1

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM				
Liquid Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD)[a] (uCi/ml)
A. Batch Waste Release Tanks[b]	B Each Batch	B Each Batch	Principal Gamma Emitters[c]	5E-7
			Mo-99, Ce-144	5E-6
			I-131	1E-6
	B One Batch/M	M	Dissolved & Entrained Gases (Gamma Emitters)	1E-5
	B Each Batch	M Composite[d]	H-3	1E-5
			Gross Alpha	1E-7
	B Each Batch	Q Composite[d]	Sr-89, Sr-90	5E-8
			Fe-55	1E-6
B. Continuous Releases [e,f]	3/W Composite[d]	W Composite[d]	Principal Gamma Emitters	5E-7
			Mo-99, Ce-144	5E-6
			I-131	1E-6
	M Grab Sample	M	Dissolved & Entrained Gases (Gamma Emitters)	1E-5
	W Composite[d]	M Composite[d]	H-3	1E-5
			Gross Alpha	1E-7
			Sr-89, Sr-90	5E-8
			Fe-55	1E-6

TABLE 3.3.1-1 *(Continued)*

TABLE NOTATION

Frequency Notation

B = Batch
W = Weekly
M = Monthly
Q = Quarterly

[a]The LLD is defined, for purposes of these Controls, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal. Equations used in the calculation of the LLD for a particular measurement system are presented in the ODCM.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

[b]A batch release is the discharge of liquid wastes of a discrete volume. Prior to samplings for analyses, each batch shall be isolated, and then thoroughly mixed to assure representative sampling. (Steam Generators may be considered a batch release for reporting purpose during shutdown condition but should be analyzed in accordance with the continuous release section of table.)

[c]The principal gamma emitters for which the LLD Control applies exclusively are the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Cs-134, Cs-137; and Ce-141. This list does not mean that only these nuclides are to be monitored. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radioactive Effluent Release Report pursuant to Reporting Requirement 5.1.

[d]A composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released.

[e]A continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.

[f]Steam generator feedwater shall be monitored for principal gamma emitters when steam generator blowdown exceeds 3E-5 uCi/ml and releases to the environment. This activity concentration is evaluated in accordance with the methodology presented in the ODCM.

2.3.2 DOSE FROM LIQUID EFFLUENTS

CONTROLS:

In accordance with Technical Specifications (6.8.4.a.4 and 6.8.4.a.5) {ITS: replaced w/: 5.5.4}, the dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each reactor unit, to UNRESTRICTED AREAS shall be limited:

1. During any calendar quarter to less than or equal to 1.5 mrems to the total body and to less than or equal to 5 mrems to any organ,

and

2. During any calendar year to less than or equal to 3 mrems to the total body and to less than or equal to 10 mrems to any organ.

APPLICABILITY: At all times.

ACTION:

With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to (Technical Specification Appendix A, 6.9.2) {ITS: replaced w/: RECS 5.7}, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective action(s) that have been taken to reduce the release(s) and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits. This Special Report shall also include (1) the results of radiological analyses of the drinking water source and (2) the radiological impact on finished drinking water supplies with regard to the requirements of 40 CFR Part 141.*

3.3.2 SURVEILLANCE REQUIREMENTS:

Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined in accordance with the methodology and parameters in the ODCM at least once per month.

* Applicable only if drinking water supply is taken from the receiving water body within 3 miles of the plant discharge. In the case of river sited plants this is 3 miles downstream only.

2.3.3 LIQUID RADWASTE TREATMENT SYSTEM

CONTROL:

In accordance with Technical Specification (Appendix A, 6.8.4.a.6) {ITS: replaced w/: 5.5.4}, the liquid radwaste treatment system shall be used when the projected doses due to the liquid effluent, from each reactor unit, to UNRESTRICTED AREAS would exceed 0.06 mrem to the total body or 0.2 mrem to any organ in a 31 day period.

APPLICABILITY: At all times.

ACTION:

With radioactive liquid waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to (Technical Specifcation Appendix A, 6.9.2) {ITS: replace w/: RECS 5.7}, a Special Report that includes the following information:

A. Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,

B. Action(s) taken to restore the inoperable equipment to OPERABLE status, and

C. Summary description of action(s) taken to prevent a recurrence.

3.3.3 SURVEILLANCE REQUIREMENTS:

Doses due to liquid releases from each reactor unit to UNRESTRICTED AREAS shall be projected at least once per month in accordance with the methodology and parameters in the ODCM when the liquid radwaste treatment systems are not being fully utilized.

2.4 RADIOACTIVE GASEOUS EFFLUENTS

2.4.1 GASEOUS EFFLUENT DOSE RATES

CONTROL:

In accordance with Technical Specification (Appendix A, 6.8.4.a.3 and 6.8.4.a.7) {ITS: replace w/: 5.5.4}, the dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY shall be limited to the following:

A. For noble gases: Less than or equal to a dose rate of 500 mrems/yr to the total body and less than or equal to a dose rate of 3000 mrems/yr to the skin,

and

B. For iodine-131, for tritium, and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to a dose rate of 1500 mrem/yr to any organ.

APPLICABILITY: At all times.

ACTION:

With the dose rate(s) exceeding the above limits, immediately restore the release rate to within the above limit(s).

3.4.1 SURVEILLANCE REQUIREMENTS:

A. The dose rate due to noble gases in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM.

B. The dose rate due to iodine-131, tritium, and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 3.4.1-1.

TABLE 3.4.1-1

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM				
Gaseous Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD[a]) (uCi/cc)
A. Waste Gas Storage	B Each Tank Grab Sample	B Each Tank	Principal Noble Gas Gamma Emitters[b]	1E-4
B. Containment Purge	B Each PURGE Grab Sample	B Each PURGE	Principal Noble Gas Gamma Emitters[b]	1E-4
C. Condenser Air Ejector	Grab Sample	M	Principal Noble Gas Gamma Emitters[b]	1E-4
D. Environmental Release Points (Plant Vent, Admin Bldg Controlled Area Vent, Radioactive Machine Shop Vent)	M[c] Grab Sample	M[c]	Principal Noble Gas Gamma Emitters[b]	1E-4
	M[d,e] Grab	M[d,e]	H-3	1E-6
	Continuous[f]	W[g] Charcoal Sample	I-131	1E-12
	Continuous[f]	W[g] Particulate Sample	Principal Gamma Emitters[b] (I-131, Others)	1E-11
	Continuous[f]	M Composite Particulate Sample	Gross Alpha	1E-11
	Continuous[f]	Q Composite Particulate Sample	Sr-89, Sr-90	1E-11
	Continuous[f]	Noble Gas Monitor	Noble Gases Gross Beta or Gamma	1E-6

TABLE 3.4.1-1 *(Continued)*

TABLE NOTATION

Frequency Notation

B = Batch
W = Weekly
M = Monthly
Q = Quarterly

[a]The LLD is defined, for purposes of these Controls, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal. Equations used in the calculation of the LLD for a particular measurement system are presented in the ODCM.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

[b]The principal gamma emitters for which the LLD Control applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be monitored. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radioactive Effluent Release Report pursuant to (Reporting Requirement 5.1.) {ITS: replace w/: RECS 5.2).}

[c]The main plant vent shall be sampled and analyzed following shutdown, startup, or a THERMAL POWER change (within one hour) exceeding 15 percent of RATED THERMAL POWER unless either (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 3: or (2) the noble gas activity monitor shows that effluent activity has not increased by more than a factor of 3. Under no circumstances would iodine samples be required more than once per day. Plant vent Tritium grab samples shall be taken at least once per 24 hours when the refueling canal is flooded unless continuous sampling equipment is in use.

[d]Plant vent tritium grab samples shall be taken at least once per 24 hours when the refueling canal is flooded unless continuous sampling equipment is in use.

TABLE 3.4.1-1 *(Continued)*

TABLE NOTATION

[e]Plant vent tritium grab samples shall be taken at least once per 7 days from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool unless continuous sampling equipment is in use.

[f]The ratio of the sample flow rate to the sampled steam flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Controls 2.4.1, 2.4.2 and 2.4.3.

[g]Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing, or after removal from sampler. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15 percent of RATED THERMAL POWER in one hour and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does not apply if either (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 3; or (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.

2.4.2 DOSE FROM NOBLE GASES

CONTROLS:

In accordance with Technical Specification (Appendix A, 6.8.4.a.5 and 6.8.4.a.8) {ITS: replace w/: 5.5.4}, the air dose due to noble gases released in gaseous effluents, from each reactor unit, to areas at and beyond the SITE BOUNDARY shall be limited to the following:

1. During any calendar quarter: Less than or equal to 5 mrads for gamma radiation and less than or equal to 10 mrads for beta radiation.

and,

2. During any calendar year: Less than or equal to 10 mrads for gamma radiation and less than or equal to 20 mrads for beta radiation.

APPLICABILITY: At all times.

ACTION:

With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to (Technical Specification Appendix A, 6.9.2) {ITS: replace w/: RECS 5.7}, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

3.4.2 SURVEILLANCE REQUIREMENTS:

Cumulative dose contributions for the current calendar quarter and current calendar year for noble gases shall be determined in accordance with the ODCM at least once per month.

2.4.3 DOSE FROM IODINE-131, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

CONTROLS:

In accordance with Technical Specification (Appendix A, 6.8.4.a.5 and 6.8.4.a.9) {ITS: replace w/: 5.5.4}, the dose to a MEMBER OF THE PUBLIC from iodine-131, tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, to areas at and beyond the SITE BOUNDARY shall be limited to the following:

1. During any calendar quarter: Less than or equal to 7.5 mrems to any organ

   and,

2. During any calendar year: Less than or equal to 15 mrems to any organ.

APPLICABILITY: At all times.

ACTION:

With the calculated dose from the release of iodine-131, tritium, and radionuclides in particulate form with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to (Technical Specification Appendix A, 6.9.2) {ITS: replace w/: RECS 5.7}, a Special Report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

3.4.3 SURVEILLANCE REQUIREMENTS:

Cumulative dose contributions for the current calendar quarter and current calendar year for iodine-131, tritium, and radionuclides in particulate form with half lives greater than 8 days shall be determined in accordance with the methodology and parameters in the ODCM at least once per month.

2.4.4 GASEOUS RADWASTE TREATMENT SYSTEM

CONTROL:

In accordance with Technical Specification (Appendix A, 6.8.4.a.6) {ITS: replace w/: 5.5.4}, the appropriate GASEOUS RADWASTE TREATMENT SYSTEM and the appropriate VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases, from each reactor unit, to areas at and beyond the SITE BOUNDARY would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation in a 31 day period. The VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases, from each reactor unit, to areas at and beyond the SITE BOUNDARY would exceed 0.3 mrem to any organ of a MEMBER OF THE PUBLIC in a 31 day period.

APPLICABILITY: At all times.

ACTION:

With gaseous waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to (Technical Specification Appendix A, 6.9.2) {ITS: replace w/: RECS 5.7}, a Special Report that includes the following information:

A. Explanation of why gaseous radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,

B. Action(s) taken to restore the inoperable equipment to OPERABLE status,

and

C. Summary description of action(s) taken to prevent a recurrence.

3.4.4 SURVEILLANCE REQUIREMENTS:

Doses due to gaseous releases from each reactor unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per month in accordance with the methodology and parameters in the ODCM when the GASEOUS RADWASTE TREATMENT SYSTEMS are not being fully utilized.

2.5/3.5 SOLID RADIOACTIVE WASTE
CONTROLS AND SURVEILLANCE REQUIREMENTS:

These sections are contained in the PCP.

2.6 TOTAL DOSE

CONTROL:

In accordance with Technical Specification (Appendix A 6.8.4.a.10) {ITS: replace w/: 5.5.4}, limit the annual (calendar year) dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to direct radiation from uranium fuel cycle sources to less than or equal to 25 mrems to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

APPLICABILITY: At all times.

ACTION:

A. With calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Control 2.3.2.1, 2.4.2.1 or 2.4.3.1, calculations should be made, including direct radiation contributions from the reactor units and from outside storage tanks, to determine whether the above limits have been exceeded. 10/00

B. If such is the case, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to (Technical Specification Appendix A 6.9.2) {ITS: replace w/: RECS 5.7}, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10 CFR Part 20.2203(a)(4), shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report within 30 days is considered a timely request, and a variance is granted until staff action on the request is complete.

3.6 SURVEILLANCE REQUIREMENTS:

A. Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Surveillance Requirements 3.3.2, 3.4.2, 3.4.3 and in accordance with the methodology and parameters in the ODCM.

B. Cumulative dose contributions from direct radiation from the reactor units and from radwaste storage tanks shall be determined in accordance with the methodology and parameters in the ODCM. This requirement is applicable only under conditions set forth in Control 2.6.

2.7 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

CONTROL:

Pursuant to Technical Specifications (Appendix A, 6.8.4.b.1) {ITS: insert: 5.5.1.b, a program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of the environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of 10CFR50, Appendix I, and (3) include the following:

A. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM.

B. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census.

C. Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in the environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.}

The Radiological Environmental Monitoring Program (REMP) shall be conducted as specified in Table 2.7-1.

APPLICABILITY: At all times.

ACTION:

A. With the Radiological Environmental Monitoring Program not being conducted as specified in Table 2.7-1, in lieu of a Licensee Event Report, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by (Reporting Requirement 5.2) {ITS: replace w/: RECS 5.3}, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.

B. With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 2.7-2 when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to (Technical Specification Appendix A, 6.9.2) {ITS: replace w/: RECS 5.7}, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to A MEMBER OF THE PUBLIC is less than the calendar year limits of Controls 2.3.2, 2.4.2, and 2.4.3.

When more than one of the radionuclides in Table 2.7-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \ldots \geq 1.0$$

When radionuclides other than those in Table 2.7-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose to A MEMBER OF THE PUBLIC is equal to or greater than the calendar year limits of Controls 2.3.2, 2.4.2, and 2.4.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report.

C. With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 2.7-1, identify locations for obtaining replacement samples and add them to the Radiological Environmental Monitoring Program within 30 days. The specific locations from which samples were unavailable may then be deleted from the monitoring program. In lieu of a Licensee Event Report and pursuant to (Reporting Requirement 5.1) {ITS: replace w/: RECS 5.2}, identify the cause of the unavailability of samples and identify the new location(s) for obtaining replacement samples in the next Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

3.7 SURVEILLANCE REQUIREMENTS:

The radiological environmental monitoring samples shall be collected pursuant to Table 2.7-1 from the specific locations given in the table and figure(s) in the ODCM and the detection capabilities required by Table 3.7-1.

TABLE 2.7-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM			
Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations[a]	Sampling and Collection Frequency	Type and Frequency of Analysis
1. Direct Radiation[b]	40 routine monitoring stations (DR1-DR40) with two or more dosimeters for measuring and recording integrated dose continuously placed as follows: an inner ring of stations, one in each meteorological sector in the general area of the site boundary (DR1-DR16) an outer ring of stations, one in each meteorological sector in the 6 to 8 km range from the site (DR17-DR32) the balance of the stations (DR33-DR40) to be placed in special interest areas and in one area to serve as a control station.	Quarterly	Gamma dose quarterly

TABLE 2.7-1 *(Continued)*

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM			
Exposure Pathway and/or Sample	**Number of Representative Samples and Sample Locations[a]**	**Sampling and Collection Frequency**	**Type and Frequency of Analysis**
2. Airborne Radioiodine and Particulates	Samples from 5 locations (A1-A5): 3 samples (A1-A3) from close to the 3 site boundary locations in different sectors, of the highest calculated annual average ground level D/Q. 1 sample (A4) from the vicinity of a community having the highest calculated annual average ground level D/Q. 1 sample (A5) from a control location as for example 15-30 km distant and in the least prevalent wind direction.	Continuous sampler operation with collection weekly, or more frequently if required by dust loading	Radioiodine Canister: I-131 analysis weekly. Particulate Sampler: Gross beta radioactivity analysis following filter change;[d] Gamma isotopic analysis[e] of composite (by location) quarterly
3. Waterborne a. Surface	1 sample upstream[f] (Wa1) 1 sample downstream (Wa2)	Composite sample over 1 month period[g]	Gamma isotopic analysis[e] monthly. Composite for tritium analysis quarterly.

TABLE 2.7-1 *(Continued)*

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM			
Exposure Pathway and/or Sample	**Number of Representative Samples and Sample Locations[a]**	**Sampling and Collection Frequency**	**Type and Frequency of Analysis**
3. Waterborne			
b. Drinking	1 sample (Wb1) of the nearest surface drinking supply	Grab monthly	Gross beta and gamma isotopic analysis monthly. Composite for tritium analysis quarterly.
c. Sediment from Shoreline	2 samples (Wc1-Wc2) 1 sample (Wc1) from downstream area with existing or potential recreational value. 1 control sample (Wc2) from an upstream area.	2 annually at least 90 days apart	Gamma isotopic analysis[e]
4. Ingestion			
a. Milk	Samples from milking animals in 3 locations (Ia1-Ia3) within 5 km distance having the highest dose potential. If there are none, then 1 sample from milking animals in each of 3 areas (Ia1-Ia3) between 5 to 8 km distant if available where doses are calculated to be greater than 1 mrem per yr[h]. 1 sample from milking animals at a control location (Ia4), 15-30 km distant and in the least prevalent wind direction.	Semimonthly when animals are on pasture; monthly at other times. Con-currently with indicator locations.	Gamma isotopic[e] and I-131 analysis semimonthly when animals are on pasture; monthly at other times.

TABLE 2.7-1 *(Continued)*

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM			
Exposure Pathway and/or Sample	**Number of Representative Samples and Sample Locations[a]**	**Sampling and Collection Frequency**	**Type and Frequency of Analysis**
4. Ingestion			
b. Fish and Invertebrates	2 samples (Ib1, Ib2) 1 sample (Ib1) of each of 2 species commercially and/or recreationally important species of fish or invertebrate in the vicinity of the discharge when available. 1 sample (Ib2) of each of 2 commercially and/or recreationally important species (the same species as in Ib1 if available) from an area not influenced by plant discharge.	Sample in season, or semi-annually if they are not seasonal	Gamma isotopic analysis[e]
c. Food Products	Samples of 3 different kinds of broad leaf vegetation (edible or inedible) grown nearest each of two different offsite locations of highest predicted annual average ground level D/Q if milk sampling is not performed (Ic1-Ic2).	Monthly when available	Gamma isotopic[e] and I-131 analysis
	1 sample of each of the similar broad leaf vegetation grown 15-30 km distant in the least prevalent wind direction if milk sampling is not performed (Ic3).	Monthly when available	Gamma isotopic[e] and I-131 analysis

TABLE 2.7-1 *(Continued)*

TABLE NOTATION

[a]The code letters in parenthesis (e.g., DR1, A1, etc.) refer to sample locations as specified in the ODCM. Specific parameters of distance and direction sector from the centerline of one reactor, and additional description where pertinent, shall be provided for each and every sample location in Table 2.7-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plant," October 1978, and to Radiological Assessment Branch Technical Position, Revision 1, November 1979. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to (Reporting Requirement 5.2) {ITS: replace w/: RECS 5.3}. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the Radiological Environmental Monitoring Program. In lieu of a Licensee Event Report and pursuant to (Reporting Requirement 5.1) {ITS: replace w/: RECS 5.2}, identify the cause of the unavailability of samples for that pathway and identify the new location(s) for obtaining replacement samples in the next Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

[b]One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation.

[c]The purpose of this sample is to obtain background information. If it is not practical to establish control locations in accordance with the distance and wind direction criteria, other sites that provide valid background data may be substituted.

[d]Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than ten times the yearly mean, of the previous calendar year, of control samples, gamma isotopic analysis shall be performed on the individual samples.

TABLE 2.7-1 *(Continued)*

TABLE NOTATION

[e]Gamma isotopic analysis means the identification and quantification of gamma emitting radionuclides that may be attributable to the effluents from the facility.

[f]"Upstream" sample shall be taken near the intake structures as described in the ODCM. The "downstream sample" shall be taken from the mixing zone at the diffuser to the discharge canal.

[g]A composite sample is one in which the quantity (aliquot) of liquid sampled shall be collected at time intervals that are very short (e.g., hourly) relative to the compositing period (e.g., monthly) in order to assure obtaining a representative sample.

[h]The dose shall be calculated for the maximum organ and age group using the methodology and parameters in the ODCM.

TABLE 2.7-2

REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES					
Reporting Levels					
Analysis	Water (pCi/l)	Airborne Particulate or Gases (pCi/m^3)	Fish (pCi/kg, wet)	Milk (pCi/l)	Food Products (pCi/kg,wet)
H-3	20,000*				
Mn-54	1,000		30,000		
Fe-59	400		10,000		
Co-58	1,000		30,000		
Co-60	300		10,000		
Zn-65	300		20,000		
Zr-Nb-95	400				
I-131	2**	0.9		3	100
Cs-134	30	10	1,000	60	1,000
Cs-137	50	20	2,000	70	2,000
Ba-La-140	200			300	

* For drinking water samples. This is 40 CFR Part 141 value. If no drinking water pathway exists, a value of 30,000 pCi/l may be used.

** If no drinking water pathway exists, a value of 20 pCi/l may be used.

TABLE 3.7-1

DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS[a]						
	LOWER LIMIT OF DETECTION (LLD)[b,c]					
Analysis	Water (pCi/l)	Airborne Particulate or Gases (pCi/m^3)	Fish (pCi/kg, wet)	Milk (pCi/l)	Food Products (pCi/kg, wet)	Sediment (pCi/kg,dry)
gross beta	4	0.01				
H-3	2,000*					
Mn-54	15		130			
Fe-59	30		260			
Co-58, 60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
I-131	1**	0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15			15		

TABLE NOTATION

* If no drinking water pathway exists, a value of 3,000 pCi/l may be used.

** If no drinking water pathway exists, a value of 15 pCi/l may be used.

TABLE 3.7-1 (Continued)

[a]This list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report pursuant to (Reporting Requirement 5.2) {ITS: replace w/: RECS 5.3}.

[b]Required detection capabilities for thermoluminescent dosimeters used for environmental measurements are given in Regulatory Guide 4.13.

[c]The LLD is defined, for purposes of these Controls as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal. Equations used in the calculation of the LLD for a particular measurement system are presented in the ODCM.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement. Analyses shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally background fluctuations, unavoidable small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors shall be identified and described in the Annual Radiological Environmental Operating Report pursuant to (Reporting Requirement 5.2) {ITS: replace w/: RECS 5.3}.

2.8 LAND USE CENSUS

CONTROL:

In accordance with Technical Specification (Appendix A, 6.8.4.b.2) {ITS: replace w/: 5.5.1.b and RECS 2.7}, conduct a land use census which identifies within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, the nearest residence and the nearest garden of greater than $50m^2$ ($500 ft^2$) producing broad leaf vegetation. Broad leaf vegetation sampling of at least three different kinds of vegetation may be performed at the SITE BOUNDARY in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. The Controls for broad leaf vegetation sampling in Table 2.7-1.4c shall be followed, including analysis of control samples.

APPLICABILITY: At all times.

ACTION:

A. With a land use census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Control 3.4.3, in lieu of a Licensee Event Report, identify the new location(s) in the next Annual Radioactive Effluent Release Report, pursuant to (Reporting Requirement 5.1) {ITS: replace w/: RECS 5.2}.

B. With a land use census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) two times greater than at a location from which samples are currently being obtained in accordance with Control 2.7, add the new location(s) to the Radiological Environmental Monitoring Program within 30 days. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after (October 31) of the year in which this land use census was conducted. In lieu of a Licensee Event Report and pursuant to (Reporting Requirement 5.1) {ITS: replace w/: RECS 5.2}, identify the new location(s) in the next Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

3.8 SURVEILLANCE REQUIREMENTS:

The land use census shall be conducted during the growing season at least once per calendar year using that information that will provide the best results, such as by a door-to-door survey, aerial survey or by consulting local agriculture authorities. The results of the land use census shall be included in the Annual Radiological Environmental Operating Report pursuant to (Reporting Requirement 5.2) {ITS: replace w/: RECS 5.3}.

2.9 INTERLABORATORY COMPARISON PROGRAM

CONTROL:

In accordance with Technical Specification (Appendix A, 6.8.4.b.3) {ITS: replace w/: 5.5.1.b and RECS 2.7}, perform analyses on radioactive materials supplied as part of an Interlaboratory Comparison Program that has been approved by the Commission.

APPLICABILITY: At all times.

ACTION:

With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to (Reporting Requirement 5.2) {ITS: replace w/: RECS 5.3}.

3.9 SURVEILLANCE REQUIREMENTS:

A summary of the results obtained as part of the required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operation Report pursuant to (Reporting Requirement 5.2) {ITS: replace w/: RECS 5.3}.

{ITS: insert:

2.10 RADIOACTIVE LIQUID EFFLUENT HOLDUP TANKS*

CONTROL:

The quantity of radioactive material contained in each of the following unprotected outdoor tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.

1. Refueling Water Storage Tank**
2. Primary Water Storage Tank
3. 31 Monitor Tank
4. 32 Monitor Tank
5. Outside Temporary Tank***

APPLICABILITY: At all times.

ACTION:

With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank. Within 48 hours, reduce the tank contents to within the limit, and describe the events leading to this condition in the next Annual Radioactive Effluent Release Report, per RECS 5.2.

3.10 SURVEILLANCE REQUIREMENTS:

The quantity of radioactive material contained in each of the listed tanks shall be determined to be less than or equal to 10 curies excluding tritium and noble gases, by analyzing a representative sample of the tanks' contents at least once per month when radioactive materials are being added to the tank.

* Tanks included in the specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

** After refueling operations, liquid from the reactor cavity will be sampled for radioactive material content prior to pumping into the tank.

*** Liquid will be sampled for radioactive content prior to being pumped into the tank.

2.11 GAS STORAGE TANKS

CONTROL:

The quantity of radioactivity contained in each gas storage tank shall be limited to less than or equal to 50,000 curies of noble gas (considered as Xe-133 equivalent).

APPLICABILITY: At all times.

ACTION:

With the quantity of radioactive material in any gas storage tank exceeding the above limit, immediately suspend all additions of radioactive material to the tank. Within 48 hours, reduce the tank contents to within the limit and describe the events leading to this condition in the next Annual Radioactive Effluent Release Report, per RECS 5.2.

3.11 SURVEILLANCE REQUIREMENTS:

The quantity of radioactive material contained in each gas storage tank shall be determined to be within the limits at least once per 24 hours when radioactive materials are being added to the tank in accordance with the methodology and parameters in the ODCM.}

4.0 BASES

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION (2/3.1)

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The alarm/trip setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding 10 times the EFFLUENT CONCENTRATION values specified in Appendix B, Table 2, Column 2 to 10 CFR 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50. The purpose of tank level indicating devices is to assure the detection and control of leaks that if not controlled could potentially result in the transport of radioactive materials to UNRESTRICTED AREAS.

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION (2/3.2)

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The alarm/trip setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63 and 64 of Appendix A to 10 CFR Part 50.

LIQUID EFFLUENTS CONCENTRATION (2/3.3.1)

This Control is provided to ensure that the concentration of radioactive materials released in liquid waste effluents to UNRESTRICTED AREAS will be less than 10 times the EFFLUENT CONCENTRATION values specified in Appendix B, Table 2, Column 2 to 10 CFR 20. The Control provides operational flexibility for releasing liquid effluents in concentrations to follow the Section II.A and II.C design objectives of Appendix I to 10 CFR Part 50. This limitation provides reasonable assurance that the levels of radioactive materials in bodies of water in UNRESTRICTED AREAS will result in exposures within (1) the Section II.A design objectives of Appendix I, 10 CFR Part 50, to a MEMBER OF THE PUBLIC and (2) the restrictions authorized by 10 CFR Part 20.1301(e). The concentration limit for the dissolved or entrained noble gases is based upon the assumption that Xe-135 is the controlling radionuclide and its EFFLUENT CONCENTRATION in air (submersion) was converted to an equivalent concentration in water. This control does not affect the requirement to comply with the annual limitations of 10 CFR Part 20.1301(a).

This Control applies to the release of radioactive materials in liquid effluents from all units at the site.

The required detection capabilities for radioactive materials in liquid waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD and other detection limits can be found in Currie, L.A., "Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements," NUREG/CR-4007 (September 1984), and in the HASL Procedures Manual, HASL-300 (revised annually).

DOSE FROM LIQUID EFFLUENTS (2/3.3.2)

This Control is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10 CFR Part 50. The Control statement implements the guides set forth in Section II.A of Appendix I. The Action statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in liquid effluents will be kept "as low as is reasonably achievable." Also, for fresh water sites with drinking water supplies that can be potentially affected by plant operations, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess of the requirements of 40 CFR Part 141. The dose calculation methodology and parameters in the ODCM implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April 1977.

This Control applies to the release of liquid effluents from each reactor at the site. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

LIQUID RADWASTE TREATMENT SYSTEM (2/3.3.3)

The requirement that the appropriate portions of this system be used, when specified, provides assurance that the releases of radioactive materials in liquid effluents will be kept "as low as is reasonably achievable". This Control implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and the design objective given in Section II.D of Appendix I to 10 CFR part 50. The specified limits governing the use of appropriate portions of the liquid radwaste treatment system were specified as a suitable fraction of the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents.

This Control applies to the release of liquid effluents from each reactor at the site. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

GASEOUS EFFLUENTS DOSE RATE (2/3.4.1)

This Control provides reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC in an UNRESTRICTED AREA, either at or beyond the Site Boundary in excess of the design objectives of Appendix I to 10 CFR Part 50. This Control is provided to ensure that gaseous effluents from all units on the site will be appropriately controlled. It provides operational flexibility for releasing gaseous effluents to satisfy the Section II.A and II.C design objectives of Appendix I to 10 CFR Part 50. For MEMBERS OF THE PUBLIC who may at times be within the Site Boundary, the occupancy of that MEMBER OF THE PUBLIC will usually be sufficiently low to compensate for the reduced atmospheric dispersion of gaseous effluents relative to that for the Site Boundary. Examples of calculations for such MEMBERS OF THE PUBLIC, with the appropriate occupancy factors, shall be given in the ODCM. The specified release rate limits restrict, at all times, the corresponding dose rates above background to a MEMBER OF THE PUBLIC at or beyond the Site Boundary to less than or equal to 500 mrem/year to the total body or to less than or equal to 3000 mrem/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mrem/year. This Control does not affect the requirement to comply with the annual limitations of 10 CFR 20.1301(a).

This Control applies to the release of gaseous effluents from all units at the site.

DOSE FROM NOBLE GASES (2/3.4.2)

This Control is provided to implement the requirements of Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The Control statements implement the guides set forth in Section II.B of Appendix I. The Action statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents will be kept "as low as is reasonably achievable." The Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated.

The dose calculation methodology and parameters established in the ODCM for calculating the doses due to the actual release rates of radioactive noble gases in gaseous effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors," Revision 1, July 1977. The ODCM equations provided for determining the air doses at and beyond the SITE BOUNDARY are based upon the historical average atmospheric conditions.

This Control applies to the release of gaseous effluents from each reactor at the site. For units with shared radwaste treatment systems, the gaseous effluents from the shared system are proportioned among the units sharing that system.

DOSE FROM IODINE-131, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM (2/3.4.3)

This Control is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50. The Controls are the guides set forth in Section II.C of Appendix I. The Action statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable." The ODCM calculational methods specified in the Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated.

The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors," Revision 1, July 1977. These equations also provide for determining the actual doses based upon the historical average atmospheric conditions. The release rate controls for Iodine-131, Tritium, and radionuclides in particulate form with half lives greater than 8 days are dependent upon the existing radionuclide pathways to man, in the areas at and beyond the SITE BOUNDARY. The pathways that were examined in the development of these calculations were: 1) individual inhalation of airborne radionuclides, 2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, 3) deposition onto grassy areas where milk animals and meat producing animals graze with consumption of the milk and meat by man (determined to be not applicable at Indian Point), and 4) deposition on the ground with subsequent exposure of man. 10/00

This Control applies to the release of gaseous effluents from each reactor at the site. For units with shared radwaste treatment systems, the gaseous effluents from the shared systems are proportioned among the units sharing that system.

GASEOUS RADWASTE TREATMENT SYSTEM (2/3.4.4)

The requirement that the appropriate portions of these systems be used, when specified, provides reasonable assurance that the release of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable." This Control implements the requirements of 10 CFR Part 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50, and the design objectives given in Section II.D of Appendix I to 10 CFR Part 50.

The specified limits governing the use of appropriate portions of the systems were specified as a suitable fraction of the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

This Control applies to the release of gaseous effluents from each reactor at the site. For units with shared radwaste treatment systems, the gaseous effluents from the shared systems are proportioned among the units sharing that system.

TOTAL DOSE (2/3.6)

This Control is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR Part 20.1301(d). The Control requires the preparation and submittal of a Special Report whenever the calculated doses due to releases of radioactivity and to radiation from uranium fuel cycle sources exceed 25 mrems to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

For sites containing up to 4 reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the reactor units and outside storage tanks are kept small. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40 CFR Part 190, submittal of the Special Report within 30 days with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR Part 190.11 and 10 CFR Part 20.2203(a)(4), is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to the other requirements for dose limitation of 10 CFR Parts 20, as addressed in Controls 2.3.1 and 2.4.1. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

Demonstration of compliance with the limits of 40 CFR Part 190 or with the design objectives of Appendix I to 10 CFR Part 50 will be considered to demonstrate compliance with the 0.1 rem limit of 10 CFR Part 20.1301.

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (2/3.7)

The Radiological Environmental Monitoring Program required by this Control provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the station operation.

This monitoring program implements Section IV.B.2 of Appendix I to 10 CFR Part 50 and thereby supplements the Radiological Effluent Monitoring Program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. Program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 3.7-1 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

LAND USE CENSUS (2/3.8)

This Control is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the Radiological Environmental Monitoring Program are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey or from consulting with local agricultural authorities shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 m^2 provides assurance that significant exposure pathways via leafy vegetables will be identified and monitored since a garden of this size is the minimum required to produce the quantity (26 kg/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: 1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and 2) a vegetation yield of 2 kg/m^2.

INTERLABORATORY COMPARISON PROGRAM (2/3.9)

The requirement for participation in an approved Interlaboratory Comparison Program is provided to ensure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are reasonably valid for the purposes of Section IV.B.2 of Appendix I to 10 CFR Part 50.

{ITS: insert:
LIQUID HOLDUP TANKS (2/3.10)

Pusuant to Technical Specification 5.5.11.c, the tanks listed in this specification include all those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tanks' contents, the resulting concentrations would be less than the values given in Appendix B, Table 2, Column 2 to 10CFR20, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICED AREA.

GAS STORAGE TANKS (2/3.11)

Pursuant to Technical Specification 5.5.11.b, the tanks included in this specification are those tanks for which the quantity of radioactivity contained is not limited directly or indirectly by another specification to a quantity that is less than the quantity that provides assurance that in the event of an uncontrolled release of the tanks' contents, the resulting total body exposure to a MEMBER OF THE PUBLIC at the nearest SITE BOUNDARY will not exceed 0.5 rem in an event of 2 hours duration.

Restricting the quantity of radioactivity contained in each gas storage tank provides assurance that in the event of an uncontrolled release of the tanks' contents, the resulting total body exposure to a MEMBER OF THE PUBLIC at the nearest SITE BOUNDARY will not exceed 0.5 rem. This is consistent with NUREG-0133.}

5.0 (REPORTING) {ITS: replace w/: ADMINISTRATIVE} REQUIREMENTS

{ITS: insert:

5.1 RECORDS RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, records shall be retained in accordance with the retention schedule of TRM 5.5.

The following specific Effluent and Environmental records shall be retained for the duration of the unit operating license:

- Records of any drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- Records of gaseous or liquid radioactive material released to the envrions.
- Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and records showing that these procedures were followed.
- Records of reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program.}

5.1 {ITS: 5.2} ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

A Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year. A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station. However, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Annual Radioactive Effluent Release Report shall include the following information:

- A summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof or as modified in the RECS.

- For solid wastes, the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period will be presented in tabular form similar to that of Table 3 of Regulatory Guide 1.21:

  a. Container volume,

  b. Total curie quantity (specify whether determined by measurement or estimate),

  c. Principal radionuclides (specify whether determined by measurement or estimate,

  d. Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),

  e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and

  f. Solidification agent or absorbent (e.g., cement, urea formaldehyde).

- An annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on electronic media of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. In lieu of submission with the Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request. 10/00

- An assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year.

- An assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in the report. Approximate and conservative approximate methods for determining the meteorological conditions shall be used for determining gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

- An assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources, when required by Sections 2.6 and 3.6, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, "Environmental Radiation Protection Standards for Nuclear Power Operation." Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109 Rev. 1, October, 1977.

- A list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

- Pursuant to Controls 2.1 and 2.2, an explanation as to why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified.

- Pursuant to Controls 2.1 and 2.2, a discussion of all deviations from the provisions of these Controls.

- Pursuant to Control 2.7 and Table 2.7-1, Notation (a), identify the causes of the unavailability of samples for pathway analysis and identify the new locations for obtaining replacement samples. Include revised figure(s) and table for the ODCM reflecting the new locations.

- Pursuant to Table 3.3.1-1, Notation (c) and Table 3.4.1-1, Notation (b), a discussion of identifiable gamma peaks, including those of nuclides specified in Tables 3.3.1-1 and 3.4.1-1.

- Pursuant to Control 2.8, a listing of new location(s) for dose calculations and/or environmental monitoring identified by the land use census. Include revised figure(s) and table for the ODCM reflecting the new location(s).

- Pursuant to (Technical Specifications, Appendix B, 1.2.1 and 1.3.2) {ITS: replace w/: Controls 2.10 and 2.11}, a description of the events leading to liquid holdup tanks or gas storage tanks exceeding the Control limits.

- Pursuant to (Technical Specifications, Appendix B, 4.3.3) {ITS: replace w/: RECS 5.4}, a discussion of the major changes to radioactive liquid, gaseous, and solid waste treatment systems.

- Pursuant to (Technical Specifications, Appendix B, 4.5.2 and 4.6.2) {ITS: replace w/: RECS 5.5 and 5.6}, any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), respectively.

5.2 {ITS: 5.3} ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

An annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. A single submittal may be made for a multiple unit station.

The Annual Radiological Environmental Operating Report shall include:

- Summaries, interpretations, and an analysis of trends of the results of the Radiological Environmental Monitoring Program for the report period, including a comparison, as appropriate, with preoperational studies, with operational controls, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment.

- At least two legible maps covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor. One map shall cover stations near the site boundary and the second shall include the more distant stations.

- The results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the tables and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

- A summary description of the Radiological Environmental Monitoring Program.

- A discussion of the reasons for not conducting the Radiological Environmental Monitoring Program as specified by Control 2.7 and the plans for preventing recurrence.

- Pursuant to Control 2.7, a discussion of environmental sample measurements that exceed the reporting levels of Table 2.7-2 but are not the result of plant effluents.

- Pursuant to Table 2.7-1, Notation (a), a discussion of all deviations from the sampling schedule of Table 2.7-1.

- Pursuant to Table 3.7-1, Notation (c), a discussion of the contributing factors for cases in which the LLD required by Table 3.7-1 was not achievable.

- Pursuant to Table 3.7-1, Notation (a), a discussion of identifiable nuclide peaks, including those of nuclides specified in Table 3.7-1.

- Pursuant to Control 3.8, the results of the land use census.

- Pursuant to Control 2.9, the corrective actions taken to prevent a recurrence if the Interlaboratory Comparison Program is not being performed as required.

- Pursuant to Control 3.9, the results of licensee participation in the Interlaboratory Comparison Program.

{ITS: insert:

5.4 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS

Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid) shall be reported to the Commission in the Annual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the PORC. The discussion of each shall contain:

- A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR Part 50.59.

- Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information

- A detailed description of the equipment, components and processes involved and the interfaces with other plant systems

- An evaluation of the change, which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto

- An evaluation of the change, which shows the expected maximum exposures to an individual in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto

- A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made

- An estimate of the exposure to plant operating personnel as a result of the change

- Documentation of the fact that the change was reviewed and found acceptable by the PORC

- A single submittal may be made for a multiple unit station

- The information called for in this Specification will be submitted as part of the annual FSAR update

5.5 PROCESS CONTROL PROGRAM (PCP)

5.5.1 The PCP shall be approved by the Commission prior to implementation.

5.5.2 Licensee initiated changes to the PCP:

5.5.2.1 Shall be documented and records of reviews performed shall be retained as required by RECS 5.1. This documentation shall contain:

- Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s); and

- A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

5.5.2.2 Shall become effective upon review and acceptance by the PORC and the approval of the Site Executive Officer.

5.5.2.3 Shall be submitted to the Commission as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the PCP was made. Each change shall be identified by marking in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

5.6 OFFSITE DOSE CALCULATION MANUAL (ODCM)

5.6.1 The ODCM shall be approved by the Commission prior to implementation.

5.6.2 Licensee initiated changes to the ODCM:

5.6.2.1 Shall be documented and records of reviews performed shall be retained as required by RECS 5.1. This documentation shall contain:

- Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s); and
- A determination that the change will maintain the level of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent dose or setpoint calculations;

5.6.2.2 Shall become effective upon review and acceptance by the PORC and the approval of the Site Executive Officer.

5.6.2.3 Shall be submitted to the Commission as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by marking in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.}

5.3 {ITS: 5.7} SPECIAL REPORTS

In lieu of a Licensee Event Report (LER), the following special reports must be generated within 30 days:

- Pursuant to Control 2.3.2, identify the cause(s) for exceeding the specified limits for dose or dose commitment to a MEMBER OF THE PUBLIC from the release of radioactive materials in liquid effluents to UNRESTRICTED AREAS. Define the corrective action(s) taken to reduce the releases and the proposed corrective action(s) to be taken to assure subsequent releases will be in compliance with limits. Include the results of radiological analyses of the drinking water source and the radiological impact on finished drinking water supplies with regard to the requirements of 40 CFR Part 141.

- Pursuant to Control 2.3.3, explain why liquid radwaste was discharged without treatment and identify any inoperable liquid radwaste treatment system equipment or subsystems and the reason for the inoperability. Include the action(s) taken to restore the inoperable equipment to OPERABLE status and a summary description of the action(s) taken to prevent a recurrence.

- Pursuant to Control 2.4.2, identify the cause(s) for exceeding the specified limit(s) for the air dose due to radioactive noble gases released in gaseous effluents. Define the corrective actions taken to reduce the releases and define the proposed corrective actions to be taken to assure subsequent releases will be in compliance with limits specified in the Control.

- Pursuant to Control 2.4.3, identify the cause(s) for exceeding the specified limits for the dose to a MEMBER OF THE PUBLIC from the release of iodine-131, tritium, and radionuclides in particulate form with half lives greater than 8 days in gaseous effluents. Define the corrective actions taken to reduce the releases and define the proposed corrective actions to be taken to assure subsequent releases will be in compliance with limits specified in the Control.

- Pursuant to Control 2.4.4, explain why gaseous radwaste was discharged without treatment and identify inoperable gaseous radwaste treatment system equipment or subsystems and the reason for the inoperability. Include the action(s) taken to restore the inoperable equipment to OPERABLE status and a summary description of the action(s) taken to prevent a recurrence.

- Pursuant to Control 2.6 and 10 CFR Part 20.2203(a)(4), define the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the specified total dose limits. Include a schedule for achieving conformance with the limits and describe the course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. Include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the releases covered by this report. Also describe the levels of radiation and the concentrations of radioactive material involved as well as the cause of the exposure levels or concentrations. Include a request, if required by the provisions of the Control, for a variance in accordance with the provisions of 40 CFR Part 190.

- Pursuant to Control 2.7, identify the cause(s) for exceeding the reporting levels of Table 2.7-2 and define the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to a MEMBER OF THE PUBLIC is less than the calendar year limits of Controls 2.3.2, 2.4.2, and 2.4.3. Report when more than one radionuclide in Table 2.7-2 is detected and

$$\frac{\text{Concentration (1)}}{\text{Reporting Level (1)}} + \frac{\text{Concentration (2)}}{\text{Reporting Level (2)}} + \ldots \geq 1.0$$

- Report when radionuclides other than those in Table 2.7-2 are detected and are the result of plant effluents and the potential annual dose to a MEMBER OF THE PUBLIC is equal to or greater than the calendar year limits of Controls 2.3.2, 2.4.2, and 2.4.3.

OFFSITE DOSE CALCULATION MANUAL

ODCM PART II

{GRAY SHADED AREAS INDICATE A REFERENCE TO IMPROVED TECHNICAL SPECIFICATIONS AND ARE NOT EFFECTIVIE UNTIL ITS HAS BEEN FULLY IMPLEMENTED.}

REVISION 14

1.0 INSTRUMENTATION AND SYSTEMS

1.1 Effluent Monitoring System Discription

Effluent monitor information is provided in Table 1-1, including an indication of which monitors use effluent setpoints. Figures 2-1 and 3-1 show a schematic of the possible radioactive release points which monitor locations for gaseous and liquid pathways, respectively.

1.2 Setpoints

This section provides equations and methodology used for each alarm and trip setpoint on each effluent release point according to Sections 2.1 and 2.2 of the RECS.

1.2.1 Setpoints for Gaseous Effluent Monitors

Setpoints for gaseous monitors are based on the permissible discharge rate as calculated in Section 3 of the ODCM. The most restrictive setpoints (based on annual average dose limit) are used whenever practical. Higher release rates may be authorized with the proper concurrence, as delineated in Section 3.1.8. The methodology identified in Section 3, along with an isotopic mix described in Table 3.8, are used to generate the following noble gas discharge rates (normally utilized for alarm setpoints):

Permissible Discharge Rate (μCi/sec)

Basis of Limit	Iodine/Particulate*	Noble Gases
Annual Average **	1.04E-2	3.08E+3
Quarterly Average **	2.08E-2	6.15E+3
Instantaneous ***	1.20E+1	3.81E+4

* Half-lives greater than 8 days

** These limits are not part of Section 2.4.1 of the RECS, but are included for information, as these limits are used for operational control of releases.

*** From Section 2.4.1 of the RECS.

1.2.1.1 The Plant Vent Wide Range Gas Monitor (R-27) reads and alarms directly in μCi/sec, hence, the alarm setpoints are set directly in μCi/sec.

1.2.1.2 If the monitor reads and alarms in μCi/cc, the maximum alarm set point is calculated as follows:

$$S = D / [(F) * (4.72E+2)]$$

where: S = Maximum alarm setpoint in μCi/cc
D = Permissible discharge rate in μCi/sec
F = Vent duct flow in ft3/min
4.72E+2 = conversion factor (28317 cc•min/ft3•60sec)

1.2.1.3 If the monitor reads and alarms in cpm then the maximum alarm setpoint is calculated as follows:

$$S = D / [(F) * (4.72E+2) * (CF)]$$

where:

S, D, F, and 4.72E+2 are defined above
CF = Calibration factor in μCi/cc per net cpm

1.2.1.4 Normally, maximum allowable limits are calculated using a standard nuclide mix. However, setpoints may be determined based on the actual mix, on a case by case basis. This method is usually performed when the instantaneous release rate is applied.

1.2.1.5 During normal operation, the Unit 3 main plant vent is the only significant release point (>99% total). If another release point becomes significant, its permissible release rate should be apportioned with the Plant Vent's to ensure the total discharge rate for all release points remains less than the maximum permissible discharge rate.

1.2.2 Setpoints for Liquid Effluent Monitors

1.2.2.1 Liquid Effluent Monitors have setpoints based on limiting the concentrations in the discharge canal to ten times the concentration values in Appendix B, Table 2, Column 2 to 10CFR20.

1.2.2.2 For monitors that read and alarm in μCi/ml, such as the liquid waste disposal monitor (R-18), the service water monitors (R-16 A and B and R-23), and the steam generator blowdown monitor (R-19) the alarm setpoint is calculated as follows:

$$S = [(ADC)(F)]/[f] = \text{Maximum alarm setpoint in } \mu Ci/ml$$

where:

F = Available discharge canal dilution flow for this release in gal/min

f = calculated allowable release rate in gal/min (see section 2.2.6)

ADC = Allowed diluted concentration is the equivalent MPCW for gamma emitting isotopes weighted for total specific activity (beta and gamma emitters). This parameter is further clarified in section 2.2.

NOTE: The gamma equivalent MPCW or ADC must be used due to the insensitivity of the radiation monitor to beta emitters and the time necessary to analyze liquid releases for these beta emitters.

1.2.2.3 Alert setpoints should be used on batch liquid release monitors to ensure the contents of the batch tank have not changed since sampling. The alert setpoint is calculated as follows:

$$AS = (C)\ (M)$$

where:

AS = Alert setpoint in μCi/ml

C = Average monitor reading at time of sample

M = A conservative factor based upon the mixing ratio of two tank volumes and an expected monitor response error term (typically 1.25, coinciding with 25%).

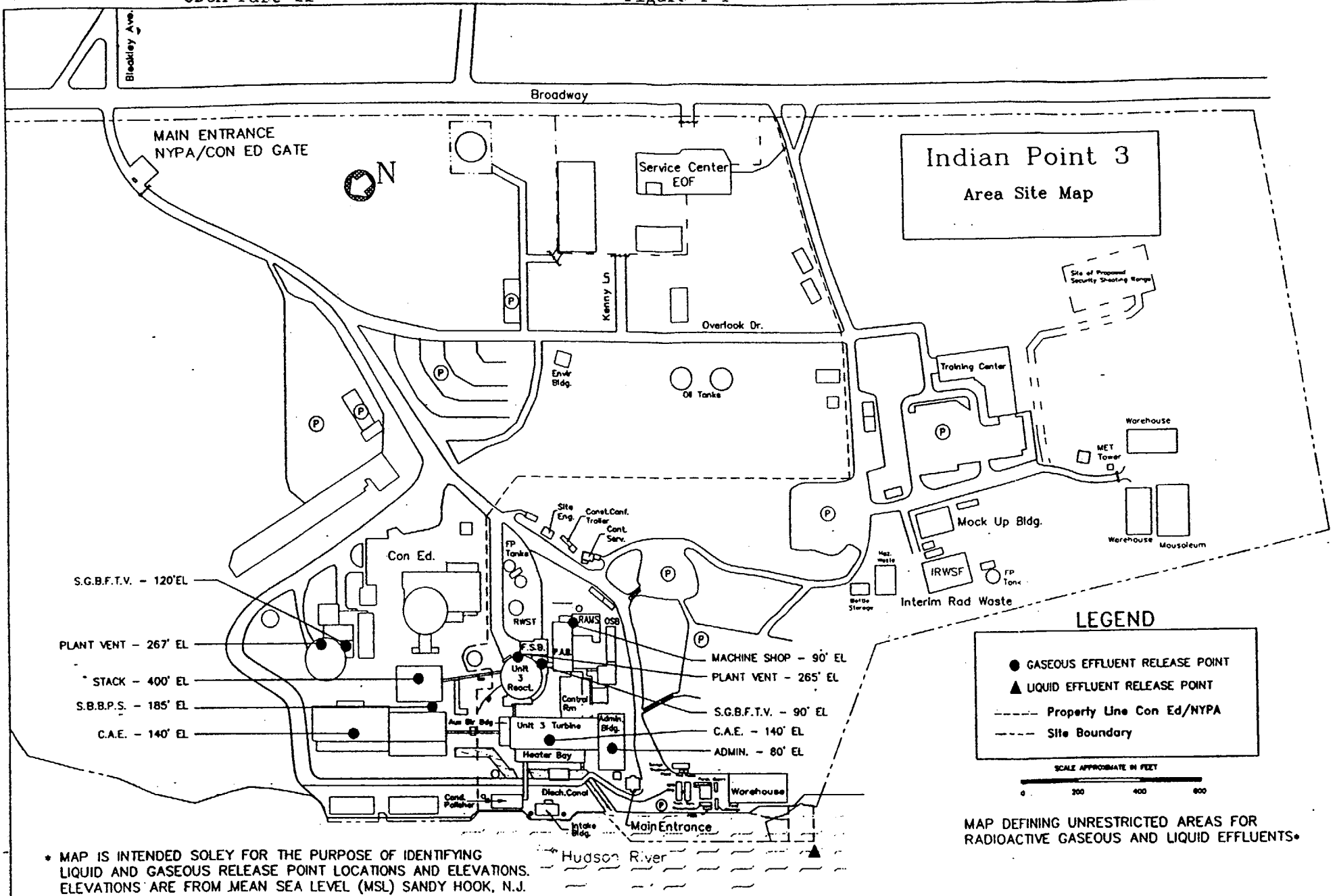
NOTE: Liquid Monitor alert setpoints do not control any auto functions but simply provide indication to the operators.

{ITS: insert:

1.3 MAP DEFINING UNRESTRICTED AREAS FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS

Information regarding radioactive gaseous and liquid effluents, which will allow identification of structures and release points as well as definition of UNRESTRICTED AREAS within the SITE BOUNDARY that are accessible to MEMBERS OF THE PUBLIC, shall be shown in Figure 1-1.

The definition of UNRESTRICED AREA used in implementing the Radiological Effluent Controls (RECS or ODCM Part I) has been expanded over that in 10 CFR 20.1003. The UNRESTRICTED AREA does not include areas over water bodies. For calculations performed pursuant to 10 CR 50.36a, the concept of UNRESTRICTED AREAS, established at or beyond the SITE BOUNDARY, is utilized in the RECS to keep levels of radioactive materials in liquid and gaseous effluents as low as reasonably achievable.}



* MAP IS INTENDED SOLEY FOR THE PURPOSE OF IDENTIFYING LIQUID AND GASEOUS RELEASE POINT LOCATIONS AND ELEVATIONS. ELEVATIONS ARE FROM MEAN SEA LEVEL (MSL) SANDY HOOK, N.J.

MAP DEFINING UNRESTRICTED AREAS FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS*

TABLE 1 – 1 (Page 1 of 2)

EFFLUENT MONITORING SYSTEM DATA

CHANNEL	MONITOR DESCRIPTION	SAMPLING LOCATIONS	RANGE	EFFLUENT CONTROL FUNCTIONS	ALARM SETPOINT USED*
R-12 G	Containment Gas Monitor	Samples drawn from 32 and 35 Containment Fan Coolers	1E-7 to 1E-1 μCi/cc	Containment Ventilation Isolation	YES
R-14** G	Plant Vent Radiogas Monitor	In Plant Vent at approximately 105' elevation	1E-6 to 1E-1 μCi/cc	Secures waste gas tank release and Containment Ventilation Isolation	YES
R-15 G	Condenser Air Ejector Monitor	In-line detector on the air ejector exhaust header	1E-6 to 1E+0 μCi/cc	On alarm diverts air ejector flow to VC, steam to condenser priming air ejector stopped and steam to reheater secured	YES
R-20 G	Waste Gas Disposal System Monitor	Adjacent to line monitor on suction to waste gas compressors	1E-2 to 1E+3 μCi/cc	None	YES***
R-27** G	Plant Vent Wide-Range Monitor	Sample drawn from inside Plant Vent	1E-7 to 1E+5 μCi/cc	Secure waste gas tank release and Containment Ventilation Isolation	YES
R-46 G	Administration Building Vent Radiogas Monitor	4th Floor Administration Building Monitor Exhaust Plenum for Controlled Areas	1E+1 to 1E+6 cpm (typically 5E-8 to 5E-2μCi/cc)	None	YES
R-59 G	RAMS Building Vent Radiogas Monitor	55' RAMS Building Monitor Exhaust Plenum	1E-6 to 1E+2 μCi/cc	None	YES

TABLE 1 – 1 (Page 2 of 2)

EFFLUENT MONITORING SYSTEM DATA

CHANNEL	MONITOR DESCRIPTION	SAMPLING LOCATIONS	RANGE	EFFLUENT CONTROL FUNCTIONS	ALARM SETPOINT USED*
R-16 A/B L	Fan Cooler and Motor Cooler Service Water Return	Adjacent to service water return line from V.C. fan cooler units and motor coolers	1E-7 to 1E-1 μCi/cc	None	YES
R-17 A/B L	Component Cooling System pump outlet	Adjacent to line monitors on each pump outlet	1E-6 to 1E-1 μCi/ml	None	NO
R-23 L	Component Cooling Heat Exchanger Service Water Monitor	Adjacent to line monitor mounted on service water return line from Component Cooling Heat Exchanger	1E-7 to 1E-1 μCi/cc	None	YES
R-18 L	Waste Disposal Liquid Effluent Monitor	In-line monitor on monitor tank recirc pump discharge	1E-7 to 1E-1 μCi/cc	Terminates monitor tank release on alarm	YES
R-19 L	SG Blowdown Monitor	PAB blowdown room monitors steam generator blown	1E-6 to 1E+2 μCi/cc	Closes blowdown isolation valves and SG sample valves	YES
R-61 L	CPF Regen Waste Release Monitor	Monitor recirc of HTDS and LTDS tanks in condensate polisher. (used when primary to secondary leakage exists)	1E-7 to 1E-1 μCi/cc	Terminates TDS tank release	YES (when P-S leak exists)

* Alarm setpoint used for effluent considerations
** If available, (R-14 or R-27 must be operating).
*** Ensures 50000 Ci limit on gas decay tanks is not exceeded.

G= Gaseous
L= Liquid

2.0 LIQUID EFFLUENTS

2.1 Liquid Effluent Releases - General Information

2.1.1 The surveillance and lower limit of detection requirements for liquid radioactive effluents are contained in Section 3.3.1 of the Radiological Effluent Controls (RECS). Lower limit of detection calculations are listed in ODCM Part II, Appendix B .

2.1.2 A completed and properly authorized Liquid Radioactive Waste Permit should be issued prior to the release of any radioactive waste from an isolated tank to the discharge canal. A permit is required for each radioactive tank to be discharged.

2.1.3 All activity determinations for liquid radioactive effluents will be performed in such a manner as to be representative of the activity released to the river.

2.1.4 The radioactivity in liquid waste tanks shall be continuously monitored during release except as allowed by 3.1 Section 2.1 of the RECS. If the flowmeter is inoperable, the flow shall be estimated every four hours by difference in tank level or by discharge pump curves.

2.1.5 Prior to discharge, the radioactive waste tank contents shall be recirculated for at least two tank volumes. After this recirculation, and prior to discharge, a sample shall be taken and analyzed for activity with a portion of the sample set aside for composite analysis. The measured activity shall be used for calculating allowable discharge rate and the alarm setpoint for the liquid waste discharge monitor.

2.1.6 Radioactive releases of steam generator blowdown during primary-secondary leaks when released to the river should be documented on Liquid Radioactive Waste Release Permits using data supplied by the Chemistry Technician.

2.1.7 Assurance that combined liquid releases from Units 2 and 3 do not exceed Section 2.3 requirement of the RECS limits for the site are provided by administrative controls. These administrative controls are agreed to in the Memorandum of Understanding (#15) between Con Edison and the New York Power Authority concerning liquid discharge and the requirements of this document.

2.1.8 The dilution flow from Unit No. 3 should be used for calculating discharge canal concentrations during the discharge. However, by agreement with Con Edison's IP2NPP Watch Supervisor and the New York Power Authority's IP3NPP Watch Supervisor, one party can reduce or eliminate radioactive liquid waste discharge for a period of time to allow the other party to use the full site dilution flow, or a specified portion thereof, for a discharge when necessary. For time average dose calculations, allocation of dilution flow for the time period are apportioned between Unit 3 and Unit 2 per Memorandum of Understanding (#15).

2.1.9 Steam Generator Blowdown activity is determined by samples taken at least three times per week. This frequency is required by Table 4.1-2 Item 6 of Appendix A {ITS: replace w/: Section 3.7.17} of the station's operating license. These "grab" samples of the steam generators are collected in a manner to be proportional to the rate of flow of individual steam generator to total steam generator blowdown. These samples are then analyzed for the various radionuclides at the frequencies specified in Table 3.3.1-1 of the RECS. (Further flow proportional composites are made where appropriate.) (Ref: NUREG 0472, REV. 3, DRAFT 6, TABLE 4.11-1.)

2.1.10 The discharge canal flow rate is determined by the use of pump flow characteristics curves. The normal flow for condenser cooling pumps is 140,000 gpm when operating at maximum speed. During the cold weather months, the condenser cooling pumps are operating at reduced speed. This reduced flow is nominally 64,000 gpm (Ref: NUREG 0472, REV. 3, DRAFT 6, TABLE 3.3-12).

2.1.11 Radioactivity content in outdoor tanks is to be limited to less than 10 curies, excluding tritium and noble gas, as per Section 2.10 of the RECS. Compliance with this requirement is demonstrated by limiting the radioactive concentration in these tanks to the value which results in 10 curies when the tank is at full liquid capacity, except as modified below. The radioactive concentration limits for these tanks are:

RWST: $$\frac{10\,curies \times 10^{6}\,\mu Ci/curie}{358{,}500\,gal \times 3785\,ml/gal} = 7.3 \times 10^{-3}\,\mu Ci/ml$$

PWST: $$\frac{10\,curies \times 10^{6}\,\mu Ci/curie}{165{,}000\,gals \times 3785\,ml/gal} = 1.6 \times 10^{-2}\,\mu Ci/ml$$

31 & 32 MT:

$$\frac{10 curies \times 10^{6}\,\mu Ci/curie}{11{,}750\,gals \times 3785\,ml/gal} = 2.2 \times 10^{-1}\,\mu Ci/ml$$

Outside Temporary Tanks:

$$\frac{10 curies \times 10^{-6}\,\mu Ci/curie}{Volume\ in\ gals \times 3785\,ml/gl} = \mu Ci/ml$$

The refueling water storage tank has the potential to be filled from the reactor cavity with liquid which exceeds the limits stated. Therefore, prior to filling the RWST from the reactor cavity after refueling operations, the reactor cavity (or residual heat removal system) must be sampled for radioactivity and action taken to ensure that the total activity in the tank does not exceed 10 curies.

Outside temporary tanks should not be filled with liquid which could exceed the concentration limit calculated. Therefore, prior to transfer to outside tanks, the source of liquid shall be sampled for radioactivity. If it exceeds the concentration limit calculated, action shall be taken to ensure that the total activity in the tank does not exceed 10 curies (Ref: NUREG 0472, REV. 3, DRAFT 6, TABLE 3.11.1.4).

2.1.12 There are no continuous composite samples for steam generator blowdown. The method of determining release concentrations is indicated below:

Individual blowdown flow rate to the river (by flowmeter or by flow curves) multiplied by sample blowdown concentration equals composite activity being released. In addition, R-19 monitors the composite steam generator blowdown released (Ref: NUREG 0472, REV. 3, DRAFT 6, TABLE 3.3-12).

2.1.13 The service water radioactivity monitors listed in Table 2.1-1 of the RECS are defined as the process radiation monitors which monitor components discharging into or are cooled by the service water system. These process radiation monitors are:

R-16 A or B:	Fan Cooler and Motor Cooler unit service water return monitors
R-23:	Component cooling service water return
R-18:	Liquid release monitor (separate release point)
R-19:	Steam generator blowdown radioactivity monitor (separate release point)

If all monitors on the effected release path are taken out of service and the removal of that monitor from service is not specifically addressed in the RECS, samples shall be taken every 12 hours or releases may not continue via this pathway. Samples may be taken on the affected monitored stream or on the service water system (Ref: NUREG 0472, REV. 3, DRAFT 6, TABLE 3.3-12).

2.1.14 Liquid effluent concentrations must be within the limitations of 2.3.1 of the RECS. The total dose per quarter and per year must be within the limitations of 2.3.2 of the RECS (Ref: NUREG 0472, REV. 3, DRAFT 6, TABLE 3.11.1.1).

2.1.15 There are no drinking water intakes within 3 miles of the site on the Hudson River (see Section 2.4.1 for further details) (Ref: NUREG 0472, REV. 3, DRAFT 6, TABLE 3.11.1.2).

2.1.16 A turbine hall drain system which would collect leakage of contaminated secondary plant waters during operation does not exist at IP3. The sumps which are present in the turbine hall five foot elevation receive drains from areas containing secondary plant components at sub-atmospheric pressures. These sumps would not meet the intent of the NUREG 0472.

The activity released to the environment via this pathway is negligible when steam generator blowdown activity is less than 3E-5 μCi/ml. Activity released via this pathway when steam generator activity exceeds 3E-5 μCi/ml is determined by the following method:

Turbine Hall Drain Effluent Activity	=	Feedwater Specific Activity	*	SG Blowdown Rate to the River

(Ref: NUREG 0472, REV. 3, DRAFT 6, TABLE 3.3-12)

2.1.17 Carbon 14 is released at a rate of .07 curies per GW(e).yr with an average make up rate of 0.5 gal/min based upon studies performed by the New York State Department of Health. The estimate of Carbon 14 releases are included in the Radiological Impact on Man section of the Annual Radioactive Effluent Release Report. These estimates are not included in dose calculations for routine releases.

2.1.18 Several normally non-radioactive systems are periodically analyzed for radioactivity. These include condensate polisher regenerant waste and the Spent Fuel Pool Backup Heat Exchanger secondary cooling system (when in use). The monitoring program for these release points is consistent with the direction set forth in NRC IE Bulletin 80-10 "Contamination of Non-radioactive Systems and Resulting Potential for Unmonitored, Uncontrolled Release of Radioactivity to Environment". Should a system become contaminated, releases will be evaluated and quantified (as either batch or continuous) in accordance with the requirements listed in the RECS.

2.1.19 The liquid waste monitor tanks have an airborne release pathway. The original plant design limited the gases through this pathway by reducing the entrained gases to less than 2E-3 μCi/ml. When the entrained gas concentration in the monitor tank inlet exceeds 2E-3 μCi/ml, the noble gas release will be quantified by calculating the difference (in μCi's) between the gaseous activity added to the tank and the gaseous activity present in the effluent release sample. This difference will be the activity released through the tank vents and is quantified as an airborne release.

2.1.20 Due to the addition of Hafnium control rods in fuel cycle 11, an offsite dose may need to be calculated for Hafnium isotopes in waste pathways. In the absence of site-specific bioaccumulation and dose factors for Hafnium, factors for Zirconium will be used, as suggested in ICRP 30. Should these calculations become necessary, they will be performed per Section 2.5 and manually added to other totals.

2.2 Liquid Effluent Concentrations

2.2.1 This section provides a description of the means that will be used to demonstrate compliance with the RECS, Section 2.3.1.

2.2.2 Compliance with the instantaneous limits of 10CFR20 is achieved by observance of discharge limits and described in Section 2.1.14. Normally for instantaneous release rate purposes, only dilution water from Unit 3 circulators is taken credit for, except as allowed by the Memorandum of Understanding between NYPA and Con Edison. A monthly report is issued which summarizes the radioactive releases from the site for the preceding month. This report provides information necessary to comply with quarterly and annual average limitations on discharge.

2.2.3 Each isolated liquid waste tank must be recirculated for at least two tank volumes prior to sampling in order to ensure a representative sample is obtained. A default minimum recirculation time may be used for 31 and 32 monitor tank in lieu of the actual calculation. This value is 4 hours, based upon the following calculation:

$$\frac{11750\ gals * 2\ Tank\ Volumes}{100\ gal/\min} = 3.9\ Hours \approx 4\ Hours$$

Note: 100 gpm is the recirculation flow rate as determined by pump curves.

2.2.4 The concentration in liquid effluents prior to dilution in the discharge canal is determined by sampling prior to release for batch releases. For continuous release the concentration can be determined by either grab sampling as in the batch release method or by direct reading radiation monitor. If the process radiation monitor is utilized care should be taken to ensure the calibration factor used is appropriate for the mixture being released.

For non-direct reading monitors, the following calculation is used:

$$C = CF * CR$$

C = Concentration of liquid effluent (μCi/ml) prior to dilution

CF = Conversion factor of monitor $\frac{\mu Ci/ml}{ncpm}$

CR = Count rate of monitor (ncpm)

2.2.5 The final diluted concentration in the discharge canal is determined by the following:

$$CD = (C) * (f)/(F)$$

Where: CD = Diluted concentration in the discharge canal in μCi/ml

C = Concentration in the liquid to be released prior to dilution in uCi/ml

F = Dilution flow in the discharge canal in gal/min

f = Release rate of liquid effluent in gal/min

NOTE: This equation is not used for calculating allowable release rates.

2.2.6 Calculation of Maximum Permissible Concentration in Liquid Effluents

a. This section describes the methodology used to ensure the requirements of section 2.3.1 of the RECS are satisfied. The total discharge canal concentration of radionuclides must be maintained less than those identified by section 2.3.1 of the RECS. The noble gases will be included using the limit 2E-4 μCi/ml as specified in section 2.3.1 of the RECS. This will normally be ensured by using an Allowed Dilution Concentration on each discrete release. This differs from the ADC calculated in 10CFR20 appendix B in that for radioisotopes that do not have gammas greater than 60 kev emitted during decay, default values are included to estimate their contribution. The Allowed Diluted Concentration is calculated as follows:

$$ADC = \frac{MPCW_i}{1 + CB/CG}$$

where:

ADC = Allowed diluted concentration in μCi/ml

MPCWt = Maximum permissible concentration in water for all isotopes (beta & gamma), in μCi/ml, as defined in RECS, Section 1.8.

CB = The concentration of the non gamma emitters, in μCi/cc

CG = The concentration of the gamma emitters in uCi/ml

b. A representative sample must be obtained. In the case of a batch release this is ensured by having the contents of the tank recirculated for at least two tank volumes after the tank has been isolated. The minimum recirculation time is determined as follows:

NOTE: As stated in Section 2.2.3, a default recirculation time for 31 and 32 monitor tanks of 4 hours may be used to simplify routine calculations.

$$T = 2 (V) / (G)$$

where:

T = Minimum recirculation time in min

V = Volumes in the tank to be discharged, in gal

G = Recirculation rate in gal/min

c. After the tank has been sampled, determine the Allowed Diluted Concentration as per step 2.2.6a.

d. Determine if other liquid radioactive discharges are being made from this unit and obtain the radioactive concentration and discharge rate. If another release is occurring, the available dilution flow must be adjusted. This may be performed by allocation or by calculation. The adjusted dilution flow is calculated as follows:

$$E = \frac{Dr * CG}{ADC}$$

where:

Dr = Current release discharge rate (gpm)

E = Required dilution flow for current release (gpm)

CG = Total concentration of gamma emitting isotopes in current release (μCi/cc)

ADC = Allowed diluted concentration for current release (μCi/ml)

e. Calculate the permissible discharge rate as follows:

$$D = \frac{ADC * B}{CG}$$

Where:

ADC = Allowed diluted concentration as calculated in Step 2.2.6.a, in uCi/ml

D = Permissible discharge rate in gal/min

B = Adjusted dilution flow from the unit, in gpm, from Step 2.2.6.d, above, as follows:

B=[Available Dilution Flow] – [Required Dilution Flow] (E)

CG = Gamma emitter concentration in μCi/ml

2.3 Liquid Effluent Dose Calculation Requirements

2.3.1 Section 2.3.2 of the RECS requires that the dose or dose commitment above background to an individual in an unrestricted area from radioactive materials in liquid effluents released from each reactor unit shall be limited:

a) During any calendar quarter: Less than or equal to 1.5 mrem to the total body and to less than or equal to 5 mrem to any organ.

b) During any calendar year: Less than or equal to 3 mrem to the total body and to less than or equal to 10 mrem to any organ.

NOTE: If either of the above limits is exceeded by a factor of two or more, then cumulative dose contributions from direct radiation would be determined by evaluation of existing perimeter and environmental TLDs per Section 2.6.A of the RECS.

2.3.2 Section 2.3.3 of the RECS requires that appropriate portions of the radwaste treatment system be used to reduce the radioactive material in liquid waste prior to their discharge when the projected dose due to liquid effluent from each reactor unit when averaged over 31 days, would exceed 0.06 mrem to the total body or 0.2 mrem to any organ. Doses due to liquid release shall be projected at least once per 31 days.

These doses are projected based on the dose methodology in Section 2.4. or 2.5. The average of previous months' doses is used to project future dose.

2.3.3 Section 2.3.1 of the RECS requires that the concentration of radioactive material released from the site shall be limited to 10 times the concentration values specified in 10 CFR Part 20, Appendix B, Table 2, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases the concentration shall be limited to 2E-4 μCi/ml total activity.

2.4 Dose Methodology (Computer Calculation)

2.4.1 NUREG 0133 (Ref. 1, Section 4.3, Pg. 14) states that cumulative dose contributions should consider the dose contribution from the maximum exposed individual's consumption of fish, invertebrates, and potable water as appropriate. The river at IP3NPP is considered to be fresh water when in reality it is a tidal estuary and never completely fresh. Observed average chlorosity at IP3NPP has ranged as high as 2.5 g/l or about 13% sea water and 87% fresh water. Hence, use of the Hudson River for water supply purposes is precluded south of Chelsea (mile point 65) which is the nearest point of potable water supply. Radionuclide concentrations in the nearest water supply have been calculated (Ref. 2) to be a factor of at least 500 lower than the river water in the Indian Point area. Exposures from ingestion of drinking water is therefore negligible.

Based on these factors, potable water consumption is not considered to be a pathway at IP3NPP. Thus, at IP3NPP, the cumulative dose considers only the dose contributions from the maximum exposed individuals consumption of fish and invertebrates. Tables of dose factors for three age groups were developed as per Section 2.4.3 and are included as Tables 2-1, 2-2, and 2-3. (Infant dose factors are 0 and are not included).

2.4.2 The relationships and methods that form the calculational base for dose accounting for the liquid effluent pathway are described in this section. These relationships can be used to meet the calculational requirements of Section 2.3.1. The cumulative dose factors (AiT) are calculated in Section 2.4.3. The following equation is generally applicable and can be used for any number of isotopes released over any time period. The equation for D(T) is to be summed over all i nuclides:

$$D(T) = \sum_{i=1}^{m} A_{iT} * \sum_{k=1}^{n} (dt_k)(C_{ik})(F_k)$$

Where:

$D(T)$ = The cumulative dose commitment from nuclides to the total body or any organ, T, from liquid effluents for the total time period equal to the sum from k=1 to n of dt_k, in mrem.

dt_k = The length of the time period, k over which C_{ik} and F_k are averaged for all liquid releases, in hours.

C_{ik} = The average concentration in μCi/ml of radionuclide, i, in undiluted liquid effluent during time period dt_k from any liquid release,.

n = The total number of releases considered.

A_{iT} = The site related ingestion dose commitment factor to the total body or any organ for each IP3NPP identified principal gamma and beta emitter listed in Table 2-1, 2-2, and 2-3, in mrem-ml per hr-μCi.

F_k = The near field average dilution factor for C_{ik} during any liquid effluent releases. Defined as the ratio of the maximum undiluted liquid waste flow during release to the average flow from the site discharge structure to unrestricted receiving waters, times an applicable factor.

The term C_{ik} is the composite undiluted concentration of radioactive material in liquid waste at the release point as determined by the radioactive liquid waste sampling and analysis program as contained in the RECS. All dilution factors beyond the sample point are included in the F_k and A_{iT} terms.

The term F_k is a near field average dilution factor and is determined as follows:

$$F_k = \frac{\text{Liquid Radioactive Waste Flow}}{[\text{Discharge Structure Exit Flow} * \text{Applicable Factor}]}$$

The liquid radioactive waste flow is the flow from all continuous and batch radioactive effluent releases specified in the RECS from all liquid radioactive waste management systems. The discharge structure exit flow is the average flow during disposal from the discharge structure release point into the receiving body of water. Based on studies by New York University Medical Center (ref. 14 page 7), the appropriate "Applicable Factor" is 5.

In order to accurately determine F_k, it is calculated based on actual dilution flow from its site for the time period considered. This affords a quantitative assessment of radiation dose resulting from liquid effluent releases at IP3NPP. The determination and use of dilution factors is discussed in Section 2.2.

2.4.3 Dose Factor for Liquid Effluent Calculations

2.4.3.1 The equation for dose from liquid effluents requires the use of a dose factor A_{iT} for each nuclide, i, which embodies the dose factors, pathway transfer factor, pathway usage factors, and dilution factors for the points of pathway origin. IP3NPP has followed the guidance of NUREG 0133 and has calculated A_{iT} for the total body and critical organ of the maximum exposed individual (e.g. the adult). All the factors needed in the equation were obtained from Regulatory Guide 1.109 (Ref. 3) with the exception of the fish and invertebrate bioaccumulation factors (BF_i and BI_i) for Cesium, Niobium, Silver, and Antimony.

For Cesium a site specific factor of 224 was used instead of the 2,000 presented in Table A-1 of the Regulatory Guide for fish. Similarly, a factor of 224 was used for invertebrates instead of the Regulatory Guide value of 1000. For Silver, the fish and invertebrate factors are 2.3 and 3300, respectively. For Niobium, the fish and invertebrate factors are 300 and 100 respectively. For Antimony, the fish and invertebrate factors are 1 and 300 respectively. The justification for these substitutions is discussed in Section 2.6. The summary dose factor is as follows:

$$A_{iT} = K[(UF)BF_i + (UI)BI_i]Df$$

Where:

A_{iT} = Composite dose parameter for the total body or critical organ for nuclide, i, for all appropriate pathways, mrem/hr per μCi/ml.

K = Units conversion factor, 114155 = (1E6pCi/μCi) (1E3ml/kg) / 8760 hr/yr

UF = kg/yr fish consumption from Table E-5 of Regulatory Guide 1.109:

21 Adult	6.9 Child
16 Teen	0 Infant

BFi = Bioaccumulation factor for nuclide, i, in fish pCi/kg per pCi/l from Table A-1 of Regulatory Guide 1.109.

UI = kg/yr invertebrate consumption from Table E-5 of Regulatory Guide 1.109:

5.0 Adult	1.7 Child
3.8 Teen	0 Infant

BIi = Bioaccumulation factor for nuclide, i, in invertebrates, pCi/kg per pCi/l from Table A-1 of Regulatory Guide 1.109.

DF_i = Dose conversion factor for nuclide i, for age groups in pre-selected organs, T, in mrem/pCi, from Tables E-11, 12 & 13 of Regulatory Guide 1.109.

IP3NPP has compiled A_{iT} factors for 3 age groups and various organs for the maximum exposed individual. These are included as Table 2-1, 2-2, and 2-3. For completeness, this table includes all isotopes found in Reg Guide 1.109, however, several isotopes listed are not routinely identified at IP-3. In addition, the values for Antimony, Silver, Cesium, and Niobium are site specific as previously discussed.

2.5 Backup Calculation Methodology

These methods provide backup calculations identical to those performed in Section 2.4

2.5.1 An alternate computer method which completely complies with Section 2.4 should be used when the primary computer system is inoperable.

2.5.2 Hand Calculations which completely comply with Section 2.4 can be employed if the primary and secondary computer codes are inoperable. Because they are time consuming and subject to calculational errors, procedural guidance in the actual flow of calculations should be used to maintain a standard format. These procedures are also used for periodic benchmark tests of the computer codes.

2.6 Site Specific Bio-Accumulation & Dose Factors

2.6.1 As stated in Section 2.4.3 the bioaccumulation factor (BF_i) for Cesium in fish is assumed to be 224 instead of the 2000 listed in Regulatory Guide 1.109 (Ref. 3). Similarly, the bioaccumulation factor for invertebrates is 224. This is based on the fact that the Hudson River at IP3NPP is not completely fresh, the Bioaccumulation Factor for salt water is 40 (Ref. 2), and that the behavior of Cesium in the Hudson is a complex phenomenon.

The NYU Study (Ref. 2) shows that Cesium concentrations in fish are regulated at a relatively constant value independent of the concentration of Cesium in water, and the bioaccumulator factors are thus inversely proportional to the water concentration of Cesium. This explains the lower bioaccumulation factor for Cesium reported by numerous investigators for salt water fish as opposed to fresh water fish because of the higher stable Cesium content of sea water. The NYU Report states that water at Indian Point has a dissolved Cesium concentration which is much higher than would be expected from simple mixing between sea water and fresh water and postulates that these higher concentrations result from leaching of Cesium from bottom sediment by saline water.

Use of the bioaccumulation factors of Regulatory Guide 1.109 for a fresh water site will thus substantially overestimate fish ingestion doses because no account is taken of the phenomena just discussed. However, radiocesium concentrations in fish may still be estimated through the use of a bioaccumulation factor, provided that this factor is determined from the body of water of interest. This factor has been estimated (Ref. 12, page 33) to be about 224 for the flesh of indigenous fish caught in the Indian Point area. In contrast, the Cesium fresh water bioaccumulation factor presented by Regulatory Guide 1.109 for fish is 2000.

Fish ingestion doses would therefore be overestimated by a factor of 13 if the Regulatory Guide values were used.

Similarly for invertebrates, the site specific bioaccumulation factor of 224 is used. This is larger than the value of 25 given in Reg Guide 1.109 for salt water invertebrates.

A second conservatism in the NRC model concerns the location at which the concentrations in the river of the discharged Cesium are evaluated. Use of this model implies that these fish have grown directly in such a location prior to being caught, which is unrealistic and adds about a factor of five in conservation. This conservatism remains in the calculation, thus the use of the NYU (Ref. 12) bioaccumulation factor is justifiable since this remains as a conservative calculation.

2.6.2 No bioaccumulation factor for Silver is listed in Rev. 1 of Regulatory Guide 1.109, Table A-1. The values of 2.3 and 3300 for fish and invertebrates were obtained from ERDA publication 660 (March 1976), Oak Ridge National Laboratories and are included in the ODCM in the interests of increased accuracy since Ag110m is a potential component of IP3NPP liquid releases.

2.6.3 International Atomic Energy Agency Report No. 57 provides data more recent than that presented in Regulatory Guide 1.109 for niobium bioaccumulation factors. The factor in the Regulatory Guide appears to be substantially overconservative and, therefore, the more recent IAEA information is incorporated into the dose calculation methodology for liquid releases of radioniobium. The values from Table XVII of IAEA No. 57 are 300 and 100 for freshwater fish and marine invertebrates respectively and are incorporated into this ODCM.

2.6.4 Antimony isotopes are not listed in Reg. Guide 1.109. As for Niobium above, IAEA Report No. 57 was used to provide bioaccumulation factors for the Antimony isotopes in Table 2-1. Dose factors were calculated for Antimony as per Reference #13.

2.6.5 In summary, with the exception of the bioaccumulation factors discussed above, all remaining factors are as follows: fish factors are for fresh water and invertebrate factors are for salt water.

Table 2 - 1

Site Related Adult Ingestion Dose Commitment Factors
(Freshwater Fish and Saltwater Invertebrate Consumption)

(AiT)
mR/hr per uCi/ml

ISOTOPE	BONE	LIVER	TOT BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	2.82E-01	2.82E-01	2.82E-01	2.82E-01	2.82E-01	2.82E-01
BE-7	3.29E-01	7.45E-01	3.69E-01	0.00E+00	7.83E-01	0.00E+00	1.28E+02
NA-24	4.08E+02	4.08E+02	4.08E+02	4.08E+02	4.08E+02	4.08E+02	4.08E+02
P-32	4.96E+07	3.08E+06	1.92E+06	0.00E+00	0.00E+00	0.00E+00	5.57E+06
CR-51	0.00E+00	0.00E+00	4.31E+00	2.58E+00	9.50E-01	5.72E+00	1.08E+03
MN-54	0.00E+00	5.43E+03	1.04E+03	0.00E+00	1.61E+03	0.00E+00	1.66E+04
MN-56	0.00E+00	1.37E+02	2.42E+01	0.00E+00	1.73E+02	0.00E+00	4.36E+03
FE-55	3.21E+04	2.21E+04	5.16E+03	0.00E+00	0.00E+00	1.24E+04	1.27E+04
FE-59	5.06E+04	1.19E+05	4.56E+04	0.00E+00	0.00E+00	3.32E+04	3.96E+05
CO-58	0.00E+00	5.15E+02	1.15E+03	0.00E+00	0.00E+00	0.00E+00	1.04E+04
CO-60	0.00E+00	1.48E+03	3.26E+03	0.00E+00	0.00E+00	0.00E+00	2.78E+04
NI-63	4.97E+04	3.45E+03	1.67E+03	0.00E+00	0.00E+00	0.00E+00	7.19E+02
NI-65	2.02E+02	2.62E+01	1.20E+01	0.00E+00	0.00E+00	0.00E+00	6.65E+02
CU-64	0.00E+00	9.08E+01	4.26E+01	0.00E+00	2.29E+02	0.00E+00	7.74E+03
ZN-65	1.61E+05	5.13E+05	2.32E+05	0.00E+00	3.43E+05	0.00E+00	3.23E+05
ZN-69	3.43E+02	6.57E+02	4.57E+01	0.00E+00	4.27E+02	0.00E+00	9.87E+01
BR-83	0.00E+00	0.00E+00	4.05E+01	0.00E+00	0.00E+00	0.00E+00	5.84E+01
BR-84	0.00E+00	0.00E+00	5.25E+01	0.00E+00	0.00E+00	0.00E+00	4.13E-04
BR-85	0.00E+00	0.00E+00	2.16E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
RB-86	0.00E+00	1.01E+05	4.72E+04	0.00E+00	0.00E+00	0.00E+00	2.00E+04
RB-88	0.00E+00	2.91E+02	1.54E+02	0.00E+00	0.00E+00	0.00E+00	4.02E-09
RB-89	0.00E+00	1.93E+02	1.35E+02	0.00E+00	0.00E+00	0.00E+00	1.12E-11
SR-89	2.57E+04	0.00E+00	7.37E+02	0.00E+00	0.00E+00	0.00E+00	4.12E+03
SR-90	6.32E+05	0.00E+00	1.55E+05	0.00E+00	0.00E+00	0.00E+00	1.82E+04
SR-91	4.72E+02	0.00E+00	1.91E+01	0.00E+00	0.00E+00	0.00E+00	2.25E+03
SR-92	1.79E+02	0.00E+00	7.75E+00	0.00E+00	0.00E+00	0.00E+00	3.55E+03
Y-90	6.07E+00	0.00E+00	1.63E-01	0.00E+00	0.00E+00	0.00E+00	6.43E+04
Y-91M	5.73E-02	0.00E+00	2.22E-03	0.00E+00	0.00E+00	0.00E+00	1.68E-01
Y-91	8.89E+01	0.00E+00	2.38E+00	0.00E+00	0.00E+00	0.00E+00	4.89E+04
Y-92	5.33E-01	0.00E+00	1.56E-02	0.00E+00	0.00E+00	0.00E+00	9.33E+03
Y-93	1.69E+00	0.00E+00	4.67E-02	0.00E+00	0.00E+00	0.00E+00	5.36E+04
ZR-95	1.63E+00	5.22E-01	3.54E-01	0.00E+00	8.20E-01	0.00E+00	1.66E+03
ZR-97	9.00E-02	1.82E-02	8.30E-03	0.00E+00	2.74E-02	0.00E+00	5.63E+03
NB-95	4.83E+00	2.69E+00	1.44E+00	0.00E+00	2.65E+00	0.00E+00	1.63E+04
MO-99	0.00E+00	1.28E+02	2.43E+01	0.00E+00	2.90E+02	0.00E+00	2.97E+02
TC-99M	1.59E-02	4.50E-02	5.73E-01	0.00E+00	6.84E-01	2.21E-02	2.66E+01
TC-101	1.64E-02	2.36E-02	2.32E-01	0.00E+00	4.25E-01	1.21E-02	7.09E-14
RU-103	1.10E+02	0.00E+00	4.74E+01	0.00E+00	4.20E+02	0.00E+00	1.28E+04
RU-105	9.16E+00	0.00E+00	3.62E+00	0.00E+00	1.18E+02	0.00E+00	5.60E+03
RU-106	1.64E+03	0.00E+00	2.07E+02	0.00E+00	3.16E+03	0.00E+00	1.06E+05
AG-110M	3.02E+02	2.80E+02	1.66E+02	0.00E+00	5.50E+02	0.00E+00	1.14E+05
SB-122	3.47E+01	7.99E-01	1.20E+01	5.38E-01	0.00E+00	2.08E+01	1.32E+04
SB-124	4.86E+02	9.20E+00	1.91E+02	1.18E+00	0.00E+00	3.79E+02	1.38E+04
SB-125	3.11E+02	3.47E+00	7.40E+01	3.16E-01	0.00E+00	2.40E+02	3.42E+03

Table 2 - 1

Site Related Adult Ingestion Dose Commitment Factors
(Freshwater Fish and Saltwater Invertebrate Consumption)

(AiT)
mR/hr per uCi/ml

ISOTOPE	BONE	LIVER	TOT BODY	THYROID	KIDNEY	LUNG	GI-LLI
TE-125M	2.72E+03	9.87E+02	3.65E+02	8.19E+02	1.11E+04	0.00E+00	1.09E+04
TE-127M	6.88E+03	2.46E+03	8.38E+02	1.76E+03	2.79E+04	0.00E+00	2.31E+04
TE-127	1.12E+02	4.01E+01	2.42E+01	8.28E+01	4.55E+02	0.00E+00	8.82E+03
TE-129M	1.17E+04	4.36E+03	1.85E+03	4.01E+03	4.88E+04	0.00E+00	5.88E+04
TE-129	3.19E+01	1.20E+01	7.77E+00	2.45E+01	1.34E+02	0.00E+00	2.41E+01
TE-131M	1.76E+03	8.60E+02	7.16E+02	1.36E+03	8.71E+03	0.00E+00	8.53E+04
TE-131	2.00E+01	8.36E+00	6.32E+00	1.65E+01	8.77E+01	0.00E+00	2.83E+00
TE-132	2.56E+03	1.66E+03	1.55E+03	1.83E+03	1.60E+04	0.00E+00	7.83E+04
I-130	4.88E+01	1.44E+02	5.68E+01	1.22E+04	2.24E+02	0.00E+00	1.24E+02
I-131	2.68E+02	3.84E+02	2.20E+02	1.26E+05	6.58E+02	0.00E+00	1.01E+02
I-132	1.31E+01	3.50E+01	1.23E+01	1.23E+03	5.58E+01	0.00E+00	6.58E+00
I-133	9.16E+01	1.59E+02	4.86E+01	2.34E+04	2.78E+02	0.00E+00	1.43E+02
I-134	6.84E+00	1.86E+01	6.64E+00	3.22E+02	2.95E+01	0.00E+00	1.62E-02
I-135	2.86E+01	7.48E+01	2.76E+01	4.93E+03	1.20E+02	0.00E+00	8.45E+01
CS-134	4.14E+04	9.84E+04	8.04E+04	0.00E+00	3.18E+04	1.06E+04	1.72E+03
CS-136	4.33E+03	1.71E+04	1.23E+04	0.00E+00	9.51E+03	1.30E+03	1.94E+03
CS-137	5.30E+04	7.25E+04	4.75E+04	0.00E+00	2.46E+04	8.18E+03	1.40E+03
CS-138	3.67E+01	7.25E+01	3.59E+01	0.00E+00	5.33E+01	5.26E+00	3.09E-04
BA-139	6.47E+00	4.61E-03	1.89E-01	0.00E+00	4.31E-03	2.61E-03	1.15E+01
BA-140	1.35E+03	1.70E+00	8.87E+01	0.00E+00	5.78E-01	9.73E-01	2.79E+03
BA-141	3.14E+00	2.37E-03	1.06E-01	0.00E+00	2.21E-03	1.35E-03	1.48E-09
BA-142	1.42E+00	1.46E-03	8.93E-02	0.00E+00	1.23E-03	8.27E-04	2.00E-18
LA-140	1.58E+00	7.95E-01	2.10E-01	0.00E+00	0.00E+00	0.00E+00	5.83E+04
LA-142	8.07E-02	3.67E-02	9.15E-03	0.00E+00	0.00E+00	0.00E+00	2.68E+02
CE-141	3.23E+00	2.18E+00	2.48E-01	0.00E+00	1.01E+00	0.00E+00	8.35E+03
CE-143	5.69E-01	4.21E+02	4.66E-02	0.00E+00	1.85E-01	0.00E+00	1.57E+04
CE-144	1.68E+02	7.04E+01	9.04E+00	0.00E+00	4.17E+01	0.00E+00	5.69E+04
PR-143	5.80E+00	2.33E+00	2.88E-01	0.00E+00	1.34E+00	0.00E+00	2.54E+04
PR-144	1.90E-02	7.88E-03	9.65E-04	0.00E+00	4.45E-03	0.00E+00	2.73E-09
ND-147	3.97E+00	4.59E+00	2.74E-01	0.00E+00	2.68E+00	0.00E+00	2.20E+04
W-187	2.98E+02	2.49E+02	8.71E+01	0.00E+00	0.00E+00	0.00E+00	8.16E+04
NP-239	3.53E-02	3.47E-03	1.91E-03	0.00E+00	1.08E-02	0.00E+00	7.12E+02
K-40	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
CO-57	0.00E+00	1.21E+02	2.01E+02	0.00E+00	0.00E+00	0.00E+00	3.07E+03
SR-85	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Y-88	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NB-94	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NB-97	4.05E-02	1.02E-02	3.74E-03	0.00E+00	1.20E-02	0.00E+00	3.78E+01
CD-109	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
SN-113	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BA-133	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
TE-134	3.29E+01	2.15E+01	1.32E+01	2.88E+01	2.08E+02	0.00E+00	3.65E-02
CE-139	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
HG-203	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Table 2 - 2

Site Related Teen Ingestion Dose Commitment Factors
(Freshwater Fish and Saltwater Invertebrate Consumption)

(AiT)
mR/hr per uCi/ml

ISOTOPE	BONE	LIVER	TOT BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	2.17E-01	2.17E-01	2.17E-01	2.17E-01	2.17E-01	2.17E-01
BE-7	3.58E-01	8.02E-01	4.01E-01	0.00E+00	8.50E-01	0.00E+00	9.76E+01
NA-24	4.20E+02	4.20E+02	4.20E+02	4.20E+02	4.20E+02	4.20E+02	4.20E+02
P-32	5.40E+07	3.35E+06	2.09E+06	0.00E+00	0.00E+00	0.00E+00	4.54E+06
CR-51	0.00E+00	0.00E+00	4.44E+00	2.47E+00	9.73E-01	6.34E+00	7.46E+02
MN-54	0.00E+00	5.33E+03	1.06E+03	0.00E+00	1.59E+03	0.00E+00	1.09E+04
MN-56	0.00E+00	1.43E+02	2.54E+01	0.00E+00	1.81E+02	0.00E+00	9.40E+03
FE-55	3.35E+04	2.37E+04	5.54E+03	0.00E+00	0.00E+00	1.51E+04	1.03E+04
FE-59	5.20E+04	1.21E+05	4.69E+04	0.00E+00	0.00E+00	3.83E+04	2.87E+05
CO-58	0.00E+00	5.10E+02	1.18E+03	0.00E+00	0.00E+00	0.00E+00	7.04E+03
CO-60	0.00E+00	1.48E+03	3.32E+03	0.00E+00	0.00E+00	0.00E+00	1.92E+04
NI-63	5.15E+04	3.64E+03	1.75E+03	0.00E+00	0.00E+00	0.00E+00	5.79E+02
NI-65	2.18E+02	2.79E+01	1.27E+01	0.00E+00	0.00E+00	0.00E+00	1.51E+03
CU-64	0.00E+00	9.53E+01	4.48E+01	0.00E+00	2.41E+02	0.00E+00	7.39E+03
ZN-65	1.46E+05	5.07E+05	2.36E+05	0.00E+00	3.24E+05	0.00E+00	2.15E+05
ZN-69	3.73E+02	7.10E+02	4.97E+01	0.00E+00	4.64E+02	0.00E+00	1.31E+03
BR-83	0.00E+00	0.00E+00	4.41E+01	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BR-84	0.00E+00	0.00E+00	5.55E+01	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BR-85	0.00E+00	0.00E+00	2.34E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
RB-86	0.00E+00	1.09E+05	5.12E+04	0.00E+00	0.00E+00	0.00E+00	1.61E+04
RB-88	0.00E+00	3.12E+02	1.66E+02	0.00E+00	0.00E+00	0.00E+00	2.67E-05
RB-89	0.00E+00	2.01E+02	1.42E+02	0.00E+00	0.00E+00	0.00E+00	3.09E-07
SR-89	2.79E+04	0.00E+00	8.00E+02	0.00E+00	0.00E+00	0.00E+00	3.33E+03
SR-90	5.27E+05	0.00E+00	1.30E+05	0.00E+00	0.00E+00	0.00E+00	1.48E+04
SR-91	5.12E+02	0.00E+00	2.04E+01	0.00E+00	0.00E+00	0.00E+00	2.32E+03
SR-92	1.94E+02	0.00E+00	8.25E+00	0.00E+00	0.00E+00	0.00E+00	4.93E+03
Y-90	6.57E+00	0.00E+00	1.77E-01	0.00E+00	0.00E+00	0.00E+00	5.42E+04
Y-91M	6.18E-02	0.00E+00	2.36E-03	0.00E+00	0.00E+00	0.00E+00	2.92E+00
Y-91	9.64E+01	0.00E+00	2.58E+00	0.00E+00	0.00E+00	0.00E+00	3.95E+04
Y-92	5.80E-01	0.00E+00	1.68E-02	0.00E+00	0.00E+00	0.00E+00	1.59E+04
Y-93	1.84E+00	0.00E+00	5.03E-02	0.00E+00	0.00E+00	0.00E+00	5.61E+04
ZR-95	1.68E+00	5.29E-01	3.64E-01	0.00E+00	7.78E-01	0.00E+00	1.22E+03
ZR-97	9.65E-02	1.91E-02	8.80E-03	0.00E+00	2.90E-02	0.00E+00	5.17E+03
NB-95	4.86E+00	2.70E+00	1.48E+00	0.00E+00	2.61E+00	0.00E+00	1.15E+04
MO-99	0.00E+00	1.36E+02	2.60E+01	0.00E+00	3.12E+02	0.00E+00	2.44E+02
TC-99M	1.63E-02	4.55E-02	5.89E-01	0.00E+00	6.77E-01	2.52E-02	2.98E+01
TC-101	1.77E-02	2.51E-02	2.47E-01	0.00E+00	4.55E-01	1.53E-02	4.30E-09
RU-103	1.15E+02	0.00E+00	4.93E+01	0.00E+00	4.06E+02	0.00E+00	9.63E+03
RU-105	9.85E+00	0.00E+00	3.82E+00	0.00E+00	1.24E+02	0.00E+00	7.96E+03
RU-106	1.77E+03	0.00E+00	2.23E+02	0.00E+00	3.42E+03	0.00E+00	8.50E+04
AG-110M	2.94E+02	2.79E+02	1.69E+02	0.00E+00	5.31E+02	0.00E+00	7.82E+04
SB-122	4.35E+01	8.47E-01	1.27E+01	5.53E-01	0.00E+00	2.72E+01	9.13E+03
SB-124	5.09E+02	9.40E+00	1.99E+02	1.16E+00	0.00E+00	4.45E+02	1.03E+04
SB-125	3.27E+02	3.58E+00	7.64E+01	3.11E-01	0.00E+00	2.85E+02	2.53E+03

Table 2 - 2

Site Related Teen Ingestion Dose Commitment Factors
(Freshwater Fish and Saltwater Invertebrate Consumption)

(AiT)
mR/hr per uCi/ml

ISOTOPE	BONE	LIVER	TOT BODY	THYROID	KIDNEY	LUNG	GI-LLI
TE-125M	2.96E+03	1.07E+03	3.96E+02	8.28E+02	0.00E+00	0.00E+00	8.75E+03
TE-127M	7.48E+03	2.65E+03	8.90E+02	1.78E+03	3.03E+04	0.00E+00	1.87E+04
TE-127	1.22E+02	4.33E+01	2.63E+01	8.44E+01	4.95E+02	0.00E+00	9.44E+03
TE-129M	1.26E+04	4.68E+03	2.00E+03	4.07E+03	5.28E+04	0.00E+00	4.74E+04
TE-129	3.47E+01	1.29E+01	8.44E+00	2.48E+01	1.46E+02	0.00E+00	1.90E+02
TE-131M	1.89E+03	9.06E+02	7.55E+02	1.36E+03	9.44E+03	0.00E+00	7.27E+04
TE-131	2.16E+01	8.90E+00	6.75E+00	1.66E+01	9.44E+01	0.00E+00	1.77E+00
TE-132	2.70E+03	1.71E+03	1.61E+03	1.80E+03	1.64E+04	0.00E+00	5.42E+04
I-130	5.06E+01	1.46E+02	5.84E+01	1.19E+04	2.25E+02	0.00E+00	1.12E+02
I-131	2.87E+02	4.02E+02	2.16E+02	1.17E+05	6.92E+02	0.00E+00	7.95E+01
I-132	1.37E+01	3.58E+01	1.29E+01	1.21E+03	5.64E+01	0.00E+00	1.56E+01
I-133	9.87E+01	1.67E+02	5.11E+01	2.34E+04	2.94E+02	0.00E+00	1.27E+02
I-134	7.17E+00	1.90E+01	6.82E+00	3.17E+02	2.99E+01	0.00E+00	2.50E-01
I-135	2.99E+01	7.71E+01	2.86E+01	4.96E+03	1.22E+02	0.00E+00	8.54E+01
CS-134	4.24E+04	9.97E+04	4.63E+04	0.00E+00	3.17E+04	1.21E+04	1.24E+03
CS-136	4.35E+03	1.71E+04	1.15E+04	0.00E+00	9.32E+03	1.47E+03	1.38E+03
CS-137	5.67E+04	7.54E+04	2.63E+04	0.00E+00	2.57E+04	9.97E+03	1.07E+03
CS-138	3.93E+01	7.54E+01	3.77E+01	0.00E+00	5.57E+01	6.48E+00	3.42E-02
BA-139	7.05E+00	4.96E-03	2.05E-01	0.00E+00	4.67E-03	3.42E-03	6.28E+01
BA-140	1.44E+03	1.76E+00	9.28E+01	0.00E+00	5.98E-01	1.19E+00	2.22E+03
BA-141	3.40E+00	2.54E-03	1.14E-01	0.00E+00	2.36E-03	1.74E-03	7.25E-06
BA-142	1.52E+00	1.52E-03	9.33E-02	0.00E+00	1.28E-03	1.01E-03	4.65E-12
LA-140	1.67E+00	8.20E-01	2.18E-01	0.00E+00	0.00E+00	0.00E+00	4.71E+04
LA-142	8.58E-02	3.81E-02	9.49E-03	0.00E+00	0.00E+00	0.00E+00	1.16E+03
CE-141	3.49E+00	2.33E+00	2.67E-01	0.00E+00	1.10E+00	0.00E+00	6.66E+03
CE-143	6.16E-01	4.48E+02	5.01E-02	0.00E+00	2.01E-01	0.00E+00	1.35E+04
CE-144	1.82E+02	7.55E+01	9.80E+00	0.00E+00	4.51E+01	0.00E+00	4.59E+04
PR-143	6.28E+00	2.51E+00	3.13E-01	0.00E+00	1.46E+00	0.00E+00	2.07E+04
PR-144	2.06E-02	8.44E-03	1.05E-03	0.00E+00	4.84E-03	0.00E+00	2.27E-05
ND-147	4.50E+00	4.89E+00	2.93E-01	0.00E+00	2.87E+00	0.00E+00	1.76E+04
W-187	3.22E+02	2.62E+02	9.19E+01	0.00E+00	0.00E+00	0.00E+00	7.10E+04
NP-239	3.98E-02	3.75E-03	2.08E-03	0.00E+00	1.18E-02	0.00E+00	6.03E+02
K-40	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
CO-57	0.00E+00	1.25E+02	2.10E+02	0.00E+00	0.00E+00	0.00E+00	2.33E+03
SR-85	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Y-88	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NB-94	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NB-97	4.36E-02	1.08E-02	3.95E-03	0.00E+00	1.27E-02	0.00E+00	2.58E+02
CD-109	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
SN-113	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BA-133	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
TE-134	3.46E+01	2.22E+01	2.32E+01	2.84E+01	2.12E+02	0.00E+00	1.28E+00
CE-139	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
HG-203	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Table 2 - 3

Site Related Child Ingestion Dose Commitment Factors
(Freshwater Fish and Saltwater Invertebrate Consumption)

(AiT)
mR/hr per uCi/ml

ISOTOPE	BONE	LIVER	TOT BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.81E-01	1.81E-01	1.81E-01	1.81E-01	1.81E-01	1.81E-01
BE-7	4.77E-01	8.08E-01	5.33E-01	0.00E+00	7.96E-01	0.00E+00	4.52E+01
NA-24	4.57E+02	4.57E+02	4.57E+02	4.57E+02	4.57E+02	4.57E+02	4.57E+02
P-32	6.98E+07	3.27E+06	2.69E+06	0.00E+00	0.00E+00	0.00E+00	1.93E+06
CR-51	0.00E+00	0.00E+00	4.86E+00	2.70E+00	7.37E-01	4.92E+00	2.58E+02
MN-54	0.00E+00	4.20E+03	1.12E+03	0.00E+00	1.18E+03	0.00E+00	3.53E+03
MN-56	0.00E+00	1.31E+02	2.96E+01	0.00E+00	1.59E+02	0.00E+00	1.90E+04
FE-55	4.55E+04	2.42E+04	7.48E+03	0.00E+00	0.00E+00	1.37E+04	4.47E+03
FE-59	6.53E+04	1.06E+05	5.27E+04	0.00E+00	0.00E+00	3.07E+04	1.10E+05
CO-58	0.00E+00	4.20E+02	1.29E+03	0.00E+00	0.00E+00	0.00E+00	2.45E+03
CO-60	0.00E+00	1.23E+03	3.64E+03	0.00E+00	0.00E+00	0.00E+00	6.84E+03
NI-63	6.85E+04	3.67E+03	2.33E+03	0.00E+00	0.00E+00	0.00E+00	2.47E+02
NI-65	2.83E+02	2.66E+01	1.55E+01	0.00E+00	0.00E+00	0.00E+00	3.26E+03
CU-64	0.00E+00	9.05E+01	5.47E+01	0.00E+00	2.19E+02	0.00E+00	4.25E+03
ZN-65	1.55E+05	4.12E+05	2.56E+05	0.00E+00	2.59E+05	0.00E+00	7.23E+04
ZN-69	4.94E+02	7.14E+02	6.60E+01	0.00E+00	4.33E+02	0.00E+00	4.50E+04
BR-83	0.00E+00	0.00E+00	5.67E+01	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BR-84	0.00E+00	0.00E+00	6.56E+01	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BR-85	0.00E+00	0.00E+00	3.02E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
RB-86	0.00E+00	1.06E+05	6.50E+04	0.00E+00	0.00E+00	0.00E+00	6.80E+03
RB-88	0.00E+00	3.00E+02	2.08E+02	0.00E+00	0.00E+00	0.00E+00	1.47E+01
RB-89	0.00E+00	1.85E+02	1.64E+02	0.00E+00	0.00E+00	0.00E+00	1.61E+00
SR-89	3.63E+04	0.00E+00	1.04E+03	0.00E+00	0.00E+00	0.00E+00	1.41E+03
SR-90	4.68E+05	0.00E+00	1.19E+05	0.00E+00	0.00E+00	0.00E+00	6.30E+03
SR-91	6.60E+02	0.00E+00	2.49E+01	0.00E+00	0.00E+00	0.00E+00	1.46E+03
SR-92	2.48E+02	0.00E+00	9.96E+00	0.00E+00	0.00E+00	0.00E+00	4.70E+03
Y-90	8.79E+00	0.00E+00	2.35E-01	0.00E+00	0.00E+00	0.00E+00	2.50E+04
Y-91M	8.17E-02	0.00E+00	2.97E-03	0.00E+00	0.00E+00	0.00E+00	1.60E+02
Y-91	1.29E+02	0.00E+00	3.44E+00	0.00E+00	0.00E+00	0.00E+00	1.71E+04
Y-92	7.70E-01	0.00E+00	2.20E-02	0.00E+00	0.00E+00	0.00E+00	2.22E+04
Y-93	2.44E+00	0.00E+00	6.69E-02	0.00E+00	0.00E+00	0.00E+00	3.63E+04
ZR-95	2.10E+00	4.62E-01	4.11E-01	0.00E+00	6.62E-01	0.00E+00	4.82E+02
ZR-97	1.27E-01	1.83E-02	1.08E-02	0.00E+00	2.63E-02	0.00E+00	2.77E+03
NB-95	5.75E+00	2.24E+00	1.60E+00	0.00E+00	2.10E+00	0.00E+00	4.14E+03
MO-99	0.00E+00	1.31E+02	3.23E+01	0.00E+00	2.79E+02	0.00E+00	1.08E+02
TC-99M	1.99E-02	3.89E-02	6.46E-01	0.00E+00	5.66E-01	1.98E-02	2.22E+01
TC-101	2.30E-02	2.41E-02	3.06E-01	0.00E+00	4.11E-01	1.27E-02	7.66E-02
RU-103	1.48E+02	0.00E+00	5.67E+01	0.00E+00	3.72E+02	0.00E+00	3.82E+03
RU-105	1.30E+01	0.00E+00	4.73E+00	0.00E+00	1.15E+02	0.00E+00	8.50E+03
RU-106	2.36E+03	0.00E+00	2.95E+02	0.00E+00	3.19E+03	0.00E+00	3.68E+04
AG-110M	3.46E+02	2.34E+02	1.87E+02	0.00E+00	4.35E+02	0.00E+00	2.78E+04
SB-122	5.80E+01	8.56E-01	1.70E+01	7.43E-01	0.00E+00	2.36E+01	4.46E+03
SB-124	6.55E+02	8.50E+00	2.29E+02	1.44E+00	0.00E+00	3.63E+02	4.09E+03
SB-125	4.22E+02	3.25E+00	8.85E+01	3.91E-01	0.00E+00	2.35E+02	1.01E+03

Table 2 - 3

Site Related Child Ingestion Dose Commitment Factors
(Freshwater Fish and Saltwater Invertebrate Consumption)

(AiT)
mR/hr per uCi/ml

ISOTOPE	BONE	LIVER	TOT BODY	THYROID	KIDNEY	LUNG	GI-LLI
TE-125M	3.81E+03	1.03E+03	5.08E+02	1.07E+03	0.00E+00	0.00E+00	3.68E+03
TE-127M	9.67E+03	2.60E+03	1.15E+03	2.31E+03	2.76E+04	0.00E+00	7.83E+03
TE-127	1.58E+02	4.25E+01	3.38E+01	1.09E+02	4.48E+02	0.00E+00	6.15E+03
TE-129M	1.63E+04	4.55E+03	2.53E+03	5.25E+03	4.78E+04	0.00E+00	1.99E+04
TE-129	4.48E+01	1.25E+01	1.06E+01	3.20E+01	1.31E+02	0.00E+00	2.79E+03
TE-131M	2.41E+03	8.33E+02	8.86E+02	1.71E+03	8.06E+03	0.00E+00	3.38E+04
TE-131	2.78E+01	8.46E+00	8.26E+00	2.12E+01	8.40E+01	0.00E+00	1.46E+02
TE-132	3.38E+03	1.50E+03	1.81E+03	2.18E+03	1.39E+04	0.00E+00	1.51E+04
I-130	6.28E+01	1.27E+02	6.54E+01	1.40E+04	1.90E+02	0.00E+00	5.94E+01
I-131	3.70E+02	3.72E+02	2.12E+02	1.23E+05	6.11E+02	0.00E+00	3.31E+01
I-132	1.72E+01	3.16E+01	1.45E+01	1.47E+03	4.84E+01	0.00E+00	3.72E+01
I-133	1.27E+02	1.58E+02	5.96E+01	2.93E+04	2.63E+02	0.00E+00	6.35E+01
I-134	9.02E+00	1.67E+01	7.70E+00	3.85E+02	2.56E+01	0.00E+00	1.11E+01
I-135	3.77E+01	6.78E+01	3.21E+01	6.00E+03	1.04E+02	0.00E+00	5.16E+01
CS-134	5.15E+04	8.44E+04	1.78E+04	0.00E+00	2.62E+04	9.39E+03	4.55E+02
CS-136	5.17E+03	1.42E+04	9.19E+03	0.00E+00	7.56E+03	1.13E+03	4.99E+02
CS-137	7.19E+04	6.88E+04	1.02E+04	0.00E+00	2.24E+04	8.07E+03	4.31E+02
CS-138	5.01E+01	6.97E+01	4.42E+01	0.00E+00	4.90E+01	5.28E+00	3.21E+01
BA-139	9.34E+00	4.99E-03	2.71E-01	0.00E+00	4.35E-03	2.93E-03	5.39E+02
BA-140	1.87E+03	1.64E+00	1.09E+02	0.00E+00	5.35E-01	9.79E-01	9.50E+02
BA-141	4.51E+00	2.53E-03	1.47E-01	0.00E+00	2.19E-03	1.48E-02	2.57E+00
BA-142	1.97E+00	1.42E-03	1.10E-01	0.00E+00	1.15E-03	8.35E-04	2.57E-02
LA-140	2.16E+00	7.55E-01	2.54E-01	0.00E+00	0.00E+00	0.00E+00	2.10E+04
LA-142	1.12E-01	3.57E-02	1.12E-02	0.00E+00	0.00E+00	0.00E+00	7.08E+03
CE-141	4.65E+00	2.32E+00	3.45E-01	0.00E+00	1.02E+00	0.00E+00	2.90E+03
CE-143	8.19E-01	4.44E+02	6.44E-02	0.00E+00	1.86E-01	0.00E+00	6.51E+03
CE-144	2.44E+02	7.64E+01	1.30E+01	0.00E+00	4.23E+01	0.00E+00	1.99E+04
PR-143	8.40E+00	2.52E+00	4.17E-01	0.00E+00	1.37E+00	0.00E+00	9.06E+03
PR-144	2.76E-02	8.53E-03	1.39E-03	0.00E+00	4.51E-03	0.00E+00	1.84E+01
ND-147	5.96E+00	4.83E+00	3.74E-01	0.00E+00	2.65E+00	0.00E+00	7.65E+03
W-187	4.08E+02	2.42E+02	1.08E+02	0.00E+00	0.00E+00	0.00E+00	3.40E+04
NP-239	5.15E-02	3.70E-03	2.60E-03	0.00E+00	1.07E-02	0.00E+00	2.74E+02
K-40	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
CO-57	0.00E+00	1.15E+02	2.33E+02	0.00E+00	0.00E+00	0.00E+00	9.43E+02
SR-85	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Y-88	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NB-94	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
NB-97	5.55E-02	1.00E-02	4.68E-03	0.00E+00	1.11E-02	0.00E+00	3.09E+03
CD-109	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
SN-113	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
BA-133	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
TE-134	4.31E+01	1.94E+01	2.59E+01	3.41E+01	1.80E+02	0.00E+00	1.97E+02
CE-139	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
HG-203	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Table 2-4

Bio-Accumulation Factors for Liquid Effluent Isotopes
(pCi/kg per pCi/liter)

ISOTOPE	Freshwater Fish BFi	Saltwater Invertebrates BIi	ISOTOPE	Freshwater Fish BFi	Saltwater Invertebrates BIi
H-3	9.000E-01	9.300E-01	TE-125M	4.000E+02	1.000E+02
BE-7	2.000E+00	2.000E+02	TE-127M	4.000E+02	1.000E+02
NA-24	1.000E+02	1.900E-01	TE-127	4.000E+02	1.000E+02
P-32	1.000E+05	3.000E+04	TE-129M	4.000E+02	1.000E+02
CR-51	2.000E+02	2.000E+03	TE-129	4.000E+02	1.000E+02
MN-54	4.000E+02	4.000E+02	TE-131M	4.000E+02	1.000E+02
MN-56	4.000E+02	4.000E+02	TE-131	4.000E+02	1.000E+02
FE-55	1.000E+02	2.000E+04	TE-132	4.000E+02	1.000E+02
FE-59	1.000E+02	2.000E+04	I-130	1.500E+01	5.000E+01
CO-58	5.000E+01	1.000E+03	I-131	1.500E+01	5.000E+01
CO-60	5.000E+01	1.000E+03	I-132	1.500E+01	5.000E+01
NI-63	1.000E+02	2.500E+02	I-133	1.500E+01	5.000E+01
NI-65	1.000E+02	2.500E+02	I-134	1.500E+01	5.000E+01
CU-64	5.000E+01	1.700E+03	I-135	1.500E+01	5.000E+01
ZN-65	2.000E+03	5.000E+04	CS-134	2.240E+02	2.240E+02
ZN-69	2.000E+03	5.000E+04	CS-136	2.240E+02	2.240E+02
BR-83	4.200E+02	3.100E+00	CS-137	2.240E+02	2.240E+02
BR-84	4.200E+02	3.100E+00	CS-138	2.240E+02	2.240E+02
BR-85	4.200E+02	3.100E+00	BA-139	4.000E+00	1.000E+02
RB-86	2.000E+03	1.700E+01	BA-140	4.000E+00	1.000E+02
RB-88	2.000E+03	1.700E+01	BA-141	4.000E+00	1.000E+02
RB-89	2.000E+03	1.700E+01	BA-142	4.000E+00	1.000E+02
SR-89	3.000E+01	2.000E+01	LA-140	2.500E+01	1.000E+03
SR-90	3.000E+01	2.000E+01	LA-142	2.500E+01	1.000E+03
SR-91	3.000E+01	2.000E+01	CE-141	1.000E+00	6.000E+02
SR-92	3.000E+01	2.000E+01	CE-143	1.000E+00	6.000E+02
Y-90	2.500E+01	1.000E+03	CE-144	1.000E+00	6.000E+02
Y-91M	2.500E+01	1.000E+03	PR-143	2.500E+01	1.000E+03
Y-91	2.500E+01	1.000E+03	PR-144	2.500E+01	1.000E+03
Y-92	2.500E+01	1.000E+03	ND-147	2.500E+01	1.000E+03
Y-93	2.500E+01	1.000E+03	W-187	1.200E+03	3.000E+01
ZR-95	3.300E+00	8.000E+01	NP-239	1.000E+01	1.000E+01
ZR-97	3.300E+00	8.000E+01	K-40	0.000E+00	0.000E+00
NB-95	3.000E+02	1.000E+02	CO-57	5.000E+01	1.000E+03
MO-99	1.000E+01	1.000E+01	SR-85	0.000E+00	0.000E+00
TC-99M	1.500E+01	5.000E+01	Y-88	0.000E+00	0.000E+00
TC-101	1.500E+01	5.000E+01	NB-94	3.000E+02	1.000E+02
RU-103	1.000E+01	1.000E+03	NB-97	3.000E+02	1.000E+02
RU-105	1.000E+01	1.000E+03	CD-109	0.000E+00	0.000E+00
RU-106	1.000E+01	1.000E+03	SN-113	0.000E+00	0.000E+00
AG-110M	2.300E+00	3.300E+03	BA-133	0.000E+00	0.000E+00
SB-122	1.000E+00	3.000E+02	TE-134	4.000E+02	1.000E+02
SB-124	1.000E+00	3.000E+02	CE-139	0.000E+00	0.000E+00
SB-125	1.000E+00	3.000E+02	HG-203	0.000E+00	0.000E+00

Bio-Accumulation Factors and DFi's for Noble Gases = 0

Figure 2-1

Radioactive Liquid Waste Effluent System Flow Diagram