

# **APPENDIX C**

## **HOPE CREEK ODCM**

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# OFFSITE DOSE CALCULATION MANUAL

FOR

PSEG NUCLEAR LLC

HOPE CREEK GENERATING STATION

Revision 20

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Revised Table 4.3.7.10-1 to clarify channel check surveillance requirements to include verification of sample flows during sump operation. Added note (5), and deleted item 3.c.

Justification: The requirements to perform channel check ODCM for the Turbine Building Circulating Water Dewatering Discharge Monitor (RE4557) was previously analyzed and included in Rev. 17 of the ODCM and was inadvertently omitted during the revision of Rev. 18 to Rev 19. Item 3.c was deleted as there is no process Flow Rate Measurement device.

Revised subtitle of Section "6.9.1.8" on page 73 to "6.9.1.7".

Justification: Corrected typographical error. This is a continuation of Section 6.9.1.7, not 6.9.1.8.

Revised 1.2.1 last paragraph, changed "as" to "at".

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Revised Appendix E to correct typographical error in the second paragraph, changed "4=ENG" to "4=ENE".

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## HOPE CREEK NUCLEAR GENERATING STATION OFFSITE DOSE CALCULATION MANUAL

### INTRODUCTION

The Hope Creek Offsite Dose Calculation Manual (ODCM) is a supporting document to the Hope Creek Technical Specifications. The previous Limiting Conditions for Operations that were contained in the Radiological Effluent Technical Specifications (RETS) are now included in the ODCM as Radiological Effluent Controls (REC). The ODCM contains two parts: Part I – Radiological Effluent Controls, and Part II – Calculational Methodologies.

Part I includes the following:

- The Radiological Effluent Controls and the Radiological Environmental Monitoring Programs required by Technical Specifications 6.8.4
- Descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Annual Radioactive Effluent Release Report required by Technical Specifications 6.9.1.6 and 6.9.1.7, respectively.

Part II describes methodologies and parameters used for:

- the calculation of radioactive liquid and gaseous effluent monitoring instrumentation alarm/trip setpoints; and
- the calculation of radioactive liquid and gaseous concentrations, dose rates, cumulative quarterly and yearly doses, and projected doses.

Part II also contains a list and graphical description of the specific sample locations for the radiological environmental monitoring program (REMP), and the liquid and gaseous waste treatment systems.

The current licensing basis applies Maximum Permissible Concentrations (MPCs) for radioactive liquid effluent concentration limits. Since the MPC values were removed from 10CFR20 effective 1/1/94, the MPC values are provided as Appendix F to the ODCM. As discussed in the Safety Evaluation By The Office Of Nuclear Reactor Regulation Related to Amendment No.121, letters between the Nuclear Management and Resources Council (NUMARC) concerning the differences between the “old” 10CFR20 and the “new” 10CFR20 allowed continued use of the instantaneous release limits (MPCs). The NUMARC letter of April 28, 1993, concluded that the RETS that reference the “old” Part 20 are generally more restrictive than the comparable requirements of the “new” Part 20, and therefore, in accordance with 10 CFR 20.1008, the existing RETS could remain in force after the licensee implements the “new” Part 20. The letter stated that the existing RETS which reference the “old” Part 20 would maintain the level of required protection of public health and safety, and would be consistent with the requirements of the “new” Part 20.

## **PART I - RADIOLOGICAL EFFLUENT CONTROLS**



**SECTION 1.0**  
**DEFINITIONS**

## **1.0 DEFINITIONS**

The following terms are defined so that uniform interpretation of these CONTROLS may be achieved. The defined terms appear in capitalized type and are applicable throughout these CONTROLS.

### **ACTION**

1.1 ACTION shall be that part of a CONTROL which prescribes remedial measures required under designated conditions.

### **CHANNEL CALIBRATION**

1.4 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel, including the required sensor, alarm, display, and trip functions, and shall include the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. Whenever an RTD or thermocouple sensing element is replaced, the next required CHANNEL CALIBRATION shall include an in place cross calibration that compares the other sensing elements with the recently installed sensing monitor. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is calibrated.

### **CHANNEL CHECK**

1.5 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

### **CHANNEL FUNCTIONAL TEST**

1.6 A CHANNEL FUNCTIONAL TEST shall be:

- a. Analog channels - the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions and channel failure trips.
- b. Bistable channels - the injection of a simulated signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

The CHANNEL FUNCTIONAL TEST may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is tested.

### **CONTROL**

1.10 The Limiting Conditions for Operation (LCOs) that were contained in the Radiological Effluent Technical Specifications were transferred to the OFFSITE DOSE CALCULATION MANUAL (ODCM) and were renamed CONTROLS. This is to distinguish between those LCOs that were retained in the Technical Specifications and those LCOs or CONTROLS that were transferred to the ODCM.

## DEFINITIONS (Continued)

### DOSE EQUIVALENT I-131

1.11 DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries per gram), which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844 "Calculation of Distance Factors for Power and Test Reactor Sites."

### FREQUENCY NOTATION

1.17 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

### MEMBER(S) OF THE PUBLIC

1.24 MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

### OFF-GAS RADWASTE TREATMENT SYSTEM (GASEOUS RADWASTE TREATMENT SYSTEM)

1.26 An OFF-GAS RADWASTE TREATMENT SYSTEM (GASEOUS RADWASTE TREATMENT SYSTEM) is any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system offgases from the main condenser evacuation system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

### OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.27 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses due to 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 Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Annual Radioactive Effluent Release Reports required by Technical Specification Sections 6.9.1.6 and 6.9.1.7, respectively.

### OPERABLE - OPERABILITY

1.28 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, 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).

**DEFINITIONS (Continued)**

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**OPERATIONAL CONDITION - CONDITION**

1.29 An OPERATIONAL CONDITION (i.e., CONDITION) shall be any one inclusive combination of mode switch position and average reactor coolant temperature as specified in Table 1.2.

**PURGE - PURGING**

1.34 PURGE or PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration, or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

**RATED THERMAL POWER**

1.35 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3339 MWT.

**REPORTABLE EVENT**

1.37 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10CFR Part 50.

**SITE BOUNDARY**

1.41 The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

**SOURCE CHECK**

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

**THERMAL POWER**

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

**UNRESTRICTED AREA**

1.50 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY, access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

**VENTILATION EXHAUST TREATMENT SYSTEM**

1.51 A VENTILATION EXHAUST TREATMENT SYSTEM shall be any system designed and installed to reduce gaseous radioiodine and radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers 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.

**DEFINITIONS (Continued)****VENTING**

1.52 VENTING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration, or other operating condition, in such a manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.

**TABLE 1.1: SURVEILLANCE FREQUENCY NOTATION**

<b><u>NOTATION</u></b>	<b><u>FREQUENCY</u></b>
S	At least once per 12 hours.
D	At least once per 24 hours.
W	At least once per 7 days.
M	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 184 days.
A	At least once per 366 days.
R	At least once per 18 months (550 days).
S/U	Prior to each reactor startup.
P	Prior to each radioactive release.
Z	During startup, prior to exceeding 30% of RATED THERMAL POWER, if not performed within the previous 7 days.
N.A.	Not applicable.

DEFINITIONS (Continued)TABLE 1.2: OPERATIONAL CONDITIONS

<u>CONDITION</u>	<u>MODE SWITCH POSITION</u>	<u>AVERAGE REACTOR COOLANT TEMPERATURE</u>
1. POWER OPERATION	Run	Any temperature
2. STARTUP	Startup/Hot Standby	Any temperature
3. HOT SHUTDOWN	Shutdown <sup>#, ***</sup>	> 200°F
4. COLD SHUTDOWN	Shutdown <sup>#, ##, ***</sup>	≤ 200°F <sup>+</sup>
5. REFUELING*	Shutdown or Refuel <sup>**, #</sup>	≤ 140°F

# The reactor mode switch may be placed in the Run, Startup/Hot Standby, or Refuel position to test the switch interlock functions and related instrumentation provided that the control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff. If the reactor mode switch is placed in the Refuel position, the one-rod-out interlock shall be OPERABLE.

## The reactor mode switch may be placed in the Refuel position while a single control rod drive is being removed from the reactor pressure vessel per Technical Specification 3.9.10.1.

\* Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

\*\* See Special Test Exceptions Technical Specification sections 3.10.1 and 3.10.3.

\*\*\* The reactor mode switch may be placed in the Refuel position while a single control rod is being recoupled or withdrawn provided that the one-rod-out interlock is OPERABLE.

+ See Special Test Exception Technical Specification 3.10.8.

**PART I**  
**RADIOLOGICAL EFFLUENT CONTROLS**  
  
**SECTIONS 3.0 AND 4.0**  
**CONTROLS**  
**AND**  
**SURVEILLANCE REQUIREMENTS**

### 3/4 CONTROLS AND SURVEILLANCE REQUIREMENTS

#### 3/4.0 APPLICABILITY

#### CONTROLS

---

3.0.1 Compliance with the CONTROLS contained in the succeeding CONTROLS is required during the OPERATIONAL CONDITIONS or other conditions specified therein; except that upon failure to meet the CONTROLS, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a CONTROL shall exist when the requirements of the CONTROL and associated ACTION requirements are not met within the specified time intervals. If the CONTROL is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a CONTROL is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in an OPERATIONAL CONDITION in which the CONTROL does not apply by placing it, as applicable, in:

1. At least STARTUP within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the CONTROL. Exceptions to these requirements are stated in the individual CONTROLS.

This CONTROL is not applicable in OPERATIONAL CONDITION 4 or 5.

3.0.4 Entry into an OPERATIONAL CONDITIONS or other specified condition shall not be made when the conditions of the CONTROLS are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual CONTROLS.

3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to CONTROL 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.



**APPLICABILITY (Continued)**

**SURVEILLANCE REQUIREMENTS**

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4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual CONTROLS unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by CONTROL 4.0.2, shall constitute a failure to meet the OPERABILITY requirements for a CONTROL. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowed outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition shall not be made unless the Surveillance Requirement(s) associated with the CONTROLS have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

### 3/4.3 INSTRUMENTATION

#### 3/ 4.3.7.10 RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

##### CONTROLS

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3.3.7.10 In accordance with Hope Creek Technical Specifications 6.8.4.g.1, the radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3.7.10-1 shall be OPERABLE with their Alarm/Trip setpoints set to ensure that the limits of CONTROL 3.11.1.1 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: During all liquid releases via these pathways.

##### 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 3.3.7.10-1. Exert best efforts to return the instrument to OPERABLE status within 30 days and, if unsuccessful, explain in the next Radioactive Effluent Release report why the inoperability was not corrected in a timely manner.
- c. The provisions of CONTROL 3.0.3 are not applicable.

##### SURVEILLANCE REQUIREMENTS

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4.3.7.10 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 at the frequencies shown in Table 4.3.7.10-1.

TABLE 3.3.7.10-1: RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>ACTION</u>
1. RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE		
a. Liquid Radwaste Discharge Line to the Cooling Tower Blowdown Line	1	110
b. Turbine Building Circulating Water Dewatering Sump Discharge Line to the Cooling Tower*	1	110
2. RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		
a. Cooling Tower Blowdown Effluent	1	111
3. FLOW RATE MEASUREMENT DEVICES		
a. Liquid Radwaste Discharge Line to the Cooling Tower Blowdown Line	1	112
b. Cooling Tower Blowdown Weir	1	112
c. Turbine Building Circulating Water Dewatering Sump Discharge Line**	N/A	N/A

TABLE 3.3.7.10-1 (Continued)

TABLE NOTATION

**ACTION 110 -** With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided that prior to initiating a release:

- a. At least two independent samples are analyzed in accordance with CONTROL 4.11.1.1.2, 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 111 -** 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 principal gamma emitters, I-131, and dissolved and entrained noble gases at the lower limits of detection required in ODCM CONTROL Table 4.11.1.1.1-B, and the Surveillance Requirement 4.11.1.1.2 is performed. Otherwise, suspend the release of radioactive effluents via this pathway.

**ACTION 112 -** 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 generated in place may be used to estimate flow.

\* See Appendix A for setpoint determination for the Turbine Building Circulating Water Dewatering Sump (TBCWDWS). Different setpoints are established for this monitor based on its use for batch release or continuous release. Automatic termination of releases from the TBCWDWS is by trip of the sump pump(s). ACTION 110 only applies to batch releases for the TBCWDWS. Continuous releases are not authorized with the TBCWDWS radiation monitor inoperable.

\*\* There are no discharge process flow rate measurement devices for this pathway. Conservative assumptions are made for release rates. The maximum release rate from the sump is 100 gpm. This value should be used for setpoint calculations to determine compliance with CONTROL 3.11.1.1. More realistic values may be used to calculate total activity released and dose consequences. Actual values should be used if process flow measurement devices are installed.

**TABLE 4.3.7.10-1: RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS**

<b>INSTRUMENT</b>	<b>CHANNEL CHECK</b>	<b>SOURCE CHECK</b>	<b>CHANNEL CALIBRATION</b>	<b>CHANNEL FUNCTIONAL TEST</b>
<b>1. RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE</b>				
a. Liquid Radwaste Discharge Line to the Cooling Tower Blowdown Line	D	P	R(3)	Q(1)
b. Turbine Building Circulating Water Dewatering Sump Discharge Line to the Cooling Tower	D(5)	M	R(3)	Q(1)
<b>2. RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE</b>				
a. Cooling Tower Blowdown Effluent	D	M	R(3)	Q(2)
<b>3. FLOW RATE MEASUREMENT DEVICES</b>				
a. Liquid Radwaste Discharge Line to Cooling Tower Blowdown Line	D(4)	N.A.	R	Q
b. Cooling Tower Blowdown Weir	D(4)	N.A.	R	Q

**TABLE 4.3.7.10-1 (Continued)**

**TABLE NOTATIONS**

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exist:
  1. Instrument indicates measured levels at or above the Alarm/Trip setpoint, or
  2. Circuit failure, or
  3. Instrument indicates a downscale failure.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exist:
  1. Instrument indicates measured levels at or above the Alarm/Trip setpoint, or
  2. Circuit failure, or
  3. Instrument indicates a downscale failure.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS)/National Institute of Standards and Testing (NIST) or using standards that have been obtained from suppliers that participate in assurance activities with NBS/NIST. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration or are NBS/NIST traceable shall be used.
- (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.
- (5) In addition to performing channel check on rad monitor, **PERFORM:**  
  
CHANNEL CHECK - daily, including verification of sample flow through the radiation monitor during sump pump operation.

### **3/4.3 INSTRUMENTATION**

#### **3/4.3.7.11 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION**

##### **CONTROLS**

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3.3.7.11 In accordance with Hope Creek Technical Specifications 6.8.4.g.1, the radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3.7.11-1 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of CONTROLS 3.11.2.1 are not exceeded. The alarm/trip setpoints of these channels meeting CONTROLS 3.11.2.1 shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

**APPLICABILITY:** As shown in Table 3.3.7.11-1

##### **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 3.3.7.11-1. Exert best efforts to return the instrument to OPERABLE status within 30 days and, if unsuccessful, explain in the next Radioactive Effluent Release Report pursuant to CONTROL 6.9.1.7 why this inoperability was not corrected in a timely manner.
- c. The provisions of CONTROLS 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

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4.3.7.11 Each radioactive gaseous 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 4.3.7.11-1.

**TABLE 3.3.7.11-1: RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION**

<b><u>INSTRUMENT</u></b>	<b><u>MINIMUM CHANNELS OPERABLE</u></b>	<b><u>APPLICABILITY</u></b>	<b><u>ACTION</u></b>
1. DELETED			
2. FILTRATION, RECIRCULATION AND VENTILATION MONITORING SYSTEM			
a. Noble Gas Activity Monitor	1	*	123
b. Iodine Sampler	1	*	125
c. Particulate Sampler	1	*	125
d. Flow Rate Monitor	1	*	122
e. Sampler Flow Rate Monitor	1	*	122
3. SOUTH PLANT VENT MONITORING SYSTEM			
a. Noble Gas Activity Monitor	1	*	123
b. Iodine Sampler	1	*	125
c. Particulate Sampler	1	*	125
d. Flow Rate Monitor	1	*	122
e. Sampler Flow Rate Monitor	1	*	122



TABLE 3.3.7.11-1(Continued)RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABILITY</u>	<u>ACTION</u>
4. NORTH PLANT VENT MONITORING SYSTEM			
a. Noble Gas Activity Monitor	1	*	123
b. Iodine Sampler	1	*	125
c. Particulate Sampler	1	*	125
d. Flow Rate Monitor	1	*	122
e. Sampler Flow Rate Monitor	1	*	122

TABLE 3.3.7.11-1 (Continued)

TABLE NOTATION

\* At all times

**ACTION 122 -** 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. Otherwise, suspend release of radioactive effluents via this pathway.

**ACTION 123 -** 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 principal gamma emitters (noble gases) at the lower limits of detection required in ODCM CONTROL Table 4.11.2.1.2-1.A or B within 24 hours. Otherwise, suspend release of radioactive effluents via this pathway.

**ACTION 124 - DELETED**

**ACTION 125 -** With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided that within 8 hours samples are continuously collected with auxiliary sampling equipment as required in Table 4.11.2.1.2-1.

**TABLE 4.3.7.11-1: RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS**

<b>INSTRUMENT</b>	<b>CHANNEL CHECK</b>	<b>SOURCE CHECK</b>	<b>CHANNEL CALIBRATION</b>	<b>CHANNEL FUNCTIONAL TEST</b>	<b>MODES IN WHICH SURVEILLANCE REQUIRED</b>
<b>1. DELETED</b>					
<b>2. FILTRATION, RECIRCULATION AND VENTILATION MONITORING SYSTEM</b>					
a. Noble Gas Activity Monitor	D	M	R(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.	R	Q	*
e. Sampler Flow Rate Monitor	D	N.A.	R	Q	*
<b>3. SOUTH PLANT VENT SYSTEM</b>					
a. Noble Gas Activity Monitor	D	M	R(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.	R	Q	*
e. Sampler Flow Rate Monitor	D	N.A.	R	Q	*

TABLE 4.3.7.11-1(Continued)RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>SOURCE CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MODES IN WHICH SURVEILLANCE REQUIRED</u>
<b>3. NORTH PLANT VENT SYSTEM</b>					
a. Noble Gas Activity Monitor	D	M	R(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.	R	Q	*
e. Sampler Flow Rate Monitor	D	N.A.	R	Q	*

TABLE 4.3.7.11-1 (Continued)TABLE NOTATION

\* At all times

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that the control room alarm annunciation occurs if any of the following conditions exist:
  1. Instrument indicates measured levels above the alarm setpoint.
  2. Circuit failure.
  3. Instrument indicates a downscale failure.
- (2) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS)/National Institute of Standards and Testing (NIST) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS/NIST. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration or are NBS/NIST traceable shall be used.

### 3/4.11 RADIOACTIVE EFFLUENTS

#### 3/4.11.1 LIQUID EFFLUENTS

##### 3/4.11.1.1 CONCENTRATION

##### CONTROLS

---

3.11.1.1 In accordance with the Hope Creek Technical Specifications 6.8.4.g.2 and 3, the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (See Figure 5.1.1.1-1) shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to  $2 \times 10^{-4}$  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 the above limits.

##### SURVEILLANCE REQUIREMENTS

---

4.11.1.1.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program in Table 4.11.1.1-1.

4.11.1.1.2 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 3.11.1.1.

**TABLE 4.11.1.1.1-1: RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM**

Liquid Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) <sup>a</sup> (μCi/ml)
<b>A. Batch Waste</b> 1) Release <sup>b</sup> Sample Tanks  2) Turbine Building Circulating Water Dewatering Sump when released in Batch Mode*	P Each Batch	P Each Batch	Principal Gamma Emitters <sup>c</sup>	5x10 <sup>-7</sup>
			I-131	1x10 <sup>-6</sup>
	P One Batch/M	M	Dissolved and Entrained Gases (Gamma Emitters)	1x10 <sup>-5</sup>
	P Each Batch	M Composite <sup>d</sup>	H-3	1x10 <sup>-5</sup>
			Gross Alpha	1x10 <sup>-7</sup>
	P Each Batch	Q Composite <sup>d</sup>	Sr-89, Sr-90	5x10 <sup>-8</sup>
			Fe-55	1x10 <sup>-6</sup>
<b>B. Continuous Releases<sup>c</sup></b> 1) Station Service Water System (SSWS) (If contaminated as indicated by SACS or RACS system)  2) Turbine Building Circulating Water Dewatering Sump*	N/A	M Composite	Principal Gamma Emitters <sup>c</sup>	5x10 <sup>-7</sup>
			I-131	1x10 <sup>-6</sup>
	W** Grab Sample	M	Dissolved and Entrained Gases	1x10 <sup>-5</sup>
	NA	M Composite <sup>d</sup>	H-3	1x10 <sup>-5</sup>
			Gross Alpha	1x10 <sup>-7</sup>
	NA	Q Composite <sup>d</sup>	Sr-89, Sr-90	5x10 <sup>-8</sup>
			Fe-55	1x10 <sup>-6</sup>

TABLE 4.11.1.1.1-1 (Continued)

## TABLE NOTATION

- 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.

For a particular measurement system, which may include radiochemical separation:

$$LLD = \frac{4.66 \cdot s_b}{E \cdot V \cdot 2.22E6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above, as microcuries per unit mass or volume,

$s_b$  is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

E is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

2.22E6 is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield, when applicable,

$\lambda$  is the radioactive decay constant for the particular radionuclide ( $\text{sec}^{-1}$ ), and

$\Delta t$  for plant effluents is the elapsed time between midpoint of sample collection and time of counting (sec).

Typical values of E, V, Y, and  $\Delta t$  should be used in the calculation.

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.



**TABLE 4.11.1.1.1-1 (Continued)****TABLE NOTATION**

- b. A batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated, and then thoroughly mixed by a method described in the ODCM to assure representative sampling.
  - c. The principal gamma emitters for which the LLD CONTROL applies exclusively are: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, and Ce-141. Ce-144 shall also be measured, but with an LLD of  $5 \times 10^{-6}$ . This list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with the above nuclides, shall also be analyzed and reported in the Radioactive Effluent Release Report pursuant to CONTROL 6.9.1.7.
  - 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.
- \* Routine releases from the Turbine Building Circulating Water Dewatering Sump below the setpoint of 2X background are considered continuous releases. Sampling of continuous releases is performed using a continuous composite sampler. Samples for analyses required in Table 4.11.1.1.1-1 for continuous releases are obtained from the composite sampler. Releases from the sump at levels at or above 2x background may be performed as batch releases. Samples for analyses required in Table 4.11.1.1.1-1 for batch releases are obtained from the sump.
- \*\* The grab sample from the Turbine Building Circulating Water Dewatering Sump for dissolved and entrained noble gases is required Monthly from the composite sampler.

### **3/ 4.11 RADIOACTIVE EFFLUENTS**

#### **3/ 4.11.1.2 DOSE**

##### **CONTROLS**

---

**3.11.1.2** In accordance with Hope Creek Technical Specifications 6.8.4.g.4 and 5, 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** (see Figure 5.1.1-1) shall be limited:

- a. During any calendar quarter to less than or equal to 1.5 mrem to the total body and to less than or equal to 5 mrem to any organ, and
- b. During any calendar year to less than or equal to 3 mrem to the total body and to less than or equal to 10 mrem to any organ.

**APPLICABILITY:** At all times.

##### **ACTION:**

- a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, 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.
- b. The provisions of CONTROL 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

---

**4.11.1.2** 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 31 days.

### **3/4.11 RADIOACTIVE EFFLUENTS**

#### **3/4.11.1.3 LIQUID WASTE TREATMENT SYSTEM**

##### **CONTROLS**

---

3.11.1.3 In accordance with the Hope Creek Technical Specifications 6.8.4.g.6, the liquid radwaste treatment system shall be OPERABLE and appropriate portions of the system shall be used to reduce the radioactive materials in liquid wastes prior to their discharge when the projected doses due to the liquid effluent, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1.1-1) would exceed 0.06 mrem to the total body or 0.2 mrem to any organ in any 31-day period.

**APPLICABILITY:** At all times.

**ACTION:**

- a. With radioactive liquid waste being discharged and in excess of the above limits and any portion of the liquid Radwaste treatment system not in operation, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, a Special Report that includes the following information:
  1. Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,
  2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
  3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of CONTROL 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

---

4.11.1.3.1 Doses due to liquid releases from each reactor unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM.

4.11.1.3.2 The installed liquid Radwaste treatment system shall be demonstrated OPERABLE by meeting CONTROLS 3.11.1.1 and 3.11.1.2.

### 3/4.11 RADIOACTIVE EFFLUENTS

#### 3/4.11.2 GASEOUS EFFLUENTS

##### 3/4.11.2.1 DOSE RATE

#### CONTROLS

---

3.11.2.1 In accordance with the Hope Creek Technical Specifications 6.8.4.g.3 and 7, the dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1.1-1) shall be limited to the following:

- a. For noble gases: Less than or equal to 500 mrem/yr to the total body and less than or equal to 3000 mrem/yr to the skin, and
- b. For iodine-131, iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to 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).

#### SURVEILLANCE REQUIREMENTS

---

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

4.11.2.1.2 The dose rate due to iodine-131, iodine-133, 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 4.11.2.1.2-1.

**TABLE 4.11.2.1.2-1: RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM**

Gaseous Release Type	Sampling Frequency	Minimum Analysis Frequency	Type of Activity Analysis	Lower Limit of Detection (LLD) <sup>a</sup> (μCi/ml)
A. Containment PURGE	P Each PURGE <sup>(c)</sup>	P Each PURGE <sup>(c)</sup>	Principal Gamma Emitters <sup>(b)</sup>	$1 \times 10^{-4}$
	Grab Sample	P	H-3 (oxide)	$1 \times 10^{-6}$
B. North Plant Vent South Plant Vent	M <sup>(c), (d)</sup> Grab Sample	M <sup>(c)</sup>	Principal Gamma Emitters <sup>(b)</sup>	$1 \times 10^{-4}$
			H-3 (oxide)	$1 \times 10^{-6}$
C. All Release Types as listed in A and B above	Continuous <sup>(e)</sup>	W <sup>(f)</sup> Charcoal Sample	I-131	$1 \times 10^{-12}$
	Continuous <sup>(e)</sup>	W <sup>(f)</sup> Particulate Sample	Principal Gamma Emitters <sup>b</sup>	$1 \times 10^{-11}$
	Continuous <sup>(e)</sup>	Q Composite Particulate Sample	Gross Alpha	$1 \times 10^{-11}$
	Continuous <sup>(e)</sup>	Q Composite Particulate Sample	Sr-89, Sr-90	$1 \times 10^{-11}$
	Continuous <sup>(e)</sup>	Noble Gas Monitor	Noble Gasses Gross Beta or Gamma	$1 \times 10^{-6}$

TABLE 4.11.2.1.2-1 (Continued)

## TABLE NOTATION

- 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.

For a particular measurement system, which may include radiochemical separation:

$$LLD = \frac{4.66 \cdot s_b}{E \cdot V \cdot 2.22E6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above, as microcuries per unit mass or volume,

$s_b$  is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

E is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

2.22E6 is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield, when applicable,

$\lambda$  is the radioactive decay constant for the particular radionuclide ( $\text{sec}^{-1}$ ), and

$\Delta t$  for plant effluents is the elapsed time between midpoint of sample collection and time of counting (sec).

Typical values of E, V, Y, and  $\Delta t$  should be used in the calculation.

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.

TABLE 4.11.2.1.2-1 (Continued)

## TABLE NOTATION

- 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 noble gas releases and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141 and Ce-144 in iodine and particulate emissions. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Radioactive Effluent Release Report pursuant to CONTROL 6.9.1.7.
- c. Sampling and analysis shall also be performed following shutdown, startup or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period. This requirement does not apply if:
  - 1. Analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of three; and
  - 2. The noble gas monitor shows that effluent activity has not increased by more than a factor of three.
- d. Tritium grab samples shall be taken at least once per 7 days from the spent fuel pool area, whenever fuel is in the spent fuel pool.
- e. The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with CONTROLS 3.11.2.1, 3.11.2.2 and 3.11.2.3.
- f. 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 1 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 (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 3; and (2) the noble gas monitor shows that effluent activity has not increased by more than a factor of three.

### **3/4.11 RADIOACTIVE EFFLUENTS**

#### **3/4.11.2.2 DOSE - NOBLE GASES**

##### **CONTROLS**

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**3.11.2.2** In accordance with the Hope Creek Technical Specification 6.8.4.g.5 and 8, the air dose due to noble gases released in gaseous effluents, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 5 mrad for gamma radiation and less than or equal to 10 mrad for beta radiation and,
- b. During any calendar year: Less than or equal to 10 mrad for gamma radiation and less than or equal to 20 mrad for beta radiation.

**APPLICABILITY:** At all times.

##### **ACTION:**

- a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, 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 release and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of CONTROLS 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

---

**4.11.2.2** Cumulative dose contributions for the current calendar quarter and current calendar year for noble gases shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.



### **3/4.11 RADIOACTIVE EFFLUENTS**

#### **3/4.11.2.3 DOSE - IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM**

##### **CONTROLS**

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3.11.2.3 In accordance with Hope Creek Technical Specification 6.8.4.g.5 and 9, the dose to a MEMBER OF THE PUBLIC from iodine-131, iodine-133, 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 (see Figure 5.1.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 7.5 mrem to any organ and,
- b. During any calendar year: Less than or equal to 15 mrem to any organ.

**APPLICABILITY:** At all times.

##### **ACTION:**

- a. With the calculated dose from the release of iodine-131, iodine-133, tritium, and radionuclides in particulate form with half-lives greater than 8 days, in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, 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.
- b. The provisions of CONTROLS 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

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4.11.2.3 Cumulative dose contributions for the current calendar quarter and current calendar year for iodine-131, iodine-133, 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 31 days.

### **3/4.11 RADIOACTIVE EFFLUENTS**

#### **3/4.11.2.4 GASEOUS RADWASTE TREATMENT**

##### **CONTROLS**

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**3.11.2.4** In accordance with Hope Creek Technical Specifications 6.8.4.g.6, the GASEOUS RADWASTE TREATMENT SYSTEM shall be in operation.

**APPLICABILITY:** Whenever the main condenser steam jet air ejector is in operation.

##### **ACTION:**

- a. With gaseous radwaste from the main condenser air ejector system being discharged without treatment for more than 7 days, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, a Special Report that includes the following information:
  1. Identification of any inoperable equipment or subsystems, and the reason for the inoperability,
  2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
  3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of CONTROL 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

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**4.11.2.4** The readings of the relevant instruments shall be checked every 12 hours when the main condenser air ejector is in use to ensure that the gaseous radwaste treatment system is functioning.

### **3/4.11 RADIOACTIVE EFFLUENTS**

#### **3/4.11.2.5 VENTILATION EXHAUST TREATMENT**

##### **CONTROLS**

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**3.11.2.5** In accordance with Hope Creek Technical Specifications 6.8.4.g.6, the VENTILATION EXHAUST TREATMENT SYSTEM for the Reactor Building and the Service and Radwaste Building shall be OPERABLE and the appropriate portions of the system shall be used to reduce release of radioactivity when the projected dose in 31 days due to gaseous effluent releases from each unit to areas at and beyond the SITE BOUNDARY (see Figure 5.1.1-1), would exceed:

- a. 0.2 mrad to air for gamma radiation, or
- b. 0.4 mrad to air for beta radiation, or
- c. 0.3 mrem to any organ of a MEMBER OF THE PUBLIC

**APPLICABILITY:** At all times.

##### **ACTION:**

- a. With radioactive ventilation exhaust being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, a Special Report that includes the following information:
  - 1. Identification of any inoperable equipment or subsystems, and the reason for the inoperability,
  - 2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
  - 3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of CONTROLS 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

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**4.11.2.5.1** Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM, when the VENTILATION EXHAUST TREATMENT SYSTEM is not being fully utilized.

**4.11.2.5.2** The installed VENTILATION EXHAUST TREATMENT SYSTEM shall be considered OPERABLE by meeting CONTROLS 3.11.2.1, 3.11.2.2, and 3.11.2.3.

### **3/4.11 RADIOACTIVE EFFLUENTS**

#### **3/4.11.2.8 VENTING OR PURGING**

##### **CONTROLS**

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**3.11.2.8 VENTING or PURGING of the Mark I containment drywell shall be through either the reactor building ventilation system or the filtration, recirculation and ventilation system.\***

**APPLICABILITY:** whenever the containment is vented or purged.

##### **ACTION:**

- a. With the requirements of the above CONTROL not satisfied, suspend all VENTING and PURGING of the drywell.
- b. The provisions of CONTROL 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

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**4.11.2.8 The containment shall be determined to be aligned for VENTING or PURGING through either the reactor building ventilation system, the filtration, recirculation and ventilation system, or the hardened torus vent within 4 hours prior to the start of and at least once per 12 hours during VENTING or PURGING of the drywell.**

**\* Following Type A Integrated Leakage Rate Testing, the Mark I containment drywell may be vented through the hardened torus vent.**

### **3/4.11 RADIOACTIVE EFFLUENTS**

#### **3/4.11.4 TOTAL DOSE**

##### **CONTROLS**

---

**3.11.4** In accordance with Hope Creek Technical Specification s 6.8.4.g.11, the annual (calendar year) dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrem to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrem.

**APPLICABILITY:** At all times

##### **ACTION:**

- a. With the calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of CONTROLS 3.11.1.2a, 3.11.1.2b, 3.11.2.2a, 3.11.2.2b, 3.11.2.3a, or 3.11.2.3b, calculations should be made including direct radiation contributions from the units and including outside storage tanks, etc. to determine whether the limits of CONTROL 3.11.4 have been exceeded. If such is the case, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, 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 20.405c, 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 is considered a timely request, and a variance is granted until staff action on the request is complete.
- b. The provisions of CONTROLS 3.0.3 are not applicable.

##### **SURVEILLANCE REQUIREMENTS**

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**4.11.4.1** Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with CONTROLS 4.11.1.2, 4.11.2.2, 4.11.2.3, and in accordance with the methodology and parameters in the ODCM.

**4.11.4.2** Cumulative dose contributions from direct radiation from the reactor units including outside storage tanks, etc. shall be determined in accordance with the methodology and parameters in the ODCM. This requirement is applicable only under conditions set forth in CONTROL 3.11.4, ACTION a.

**3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING****3/4.12.1 MONITORING PROGRAM****CONTROLS**

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**3.12.1.** In accordance with Hope Creek Technical Specifications 6.8.4.h.1, the radiological environmental monitoring program shall be conducted as specified in Table 3.12.1-1.

**APPLICABILITY:** At all times.

**ACTION:**

- a. With the radiological environmental monitoring program not being conducted as specified in Table 3.12.1-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Technical Specification 6.9.1.6, 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 3.12.1-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, pursuant to Technical Specification 6.9.2, 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 3.11.1.2, 3.11.2.2, and 3.11.2.3. When more than one of the radionuclides in Table 3.12.1-2 are detected in the sampling medium, this report shall be submitted if:

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

When radionuclides other than those in Table 3.12.1-2 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 from all radionuclides is equal to or greater than the calendar year limits of CONTROLS 3.11.1.2, 3.11.2.2, and 3.11.2.3. 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 pursuant to CONTROL 6.9.1.6.

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\*The methodology used to estimate the potential annual dose to a MEMBER OF THE PUBLIC shall be indicated in this report.

**3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING****3/4.12.1 MONITORING PROGRAM****CONTROLS (Continued)**

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**ACTION: (Continued)**

- c. With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 3.12.1-1, identify specific 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. Pursuant to CONTROL 6.9.1.7, identify the cause of the unavailability of samples and the new location(s) for obtaining replacement samples in the next Radioactive Effluent Release Report pursuant to CONTROL 6.9.1.7 and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).
- d. The provisions of CONTROLS 3.0.3 are not applicable.

**SURVEILLANCE REQUIREMENTS**

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4.12.1 The radiological environmental monitoring samples shall be collected pursuant to Table 3.12.1-1 from the specific locations given in the table and figure(s) in the ODCM, and shall be analyzed pursuant to the requirements of Table 3.12.1-1, and the detection capabilities required by Table 4.12.1-1.

**TABLE 3.12.1-1: RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM \***

<b><u>EXPOSURE PATHWAY AND/OR SAMPLE</u></b>	<b><u>NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS<sup>(1)</sup></u></b>	<b><u>SAMPLING AND COLLECTION FREQUENCY</u></b>	<b><u>TYPE AND FREQUENCY OF ANALYSIS</u></b>
<b>1. DIRECT RADIATION<sup>(2)</sup></b>	<p>Forty-three routine monitoring stations with two or more dosimeters placed as follows:</p> <p>An inner ring of stations one in each meteorological sector in the general area of the SITE BOUNDARY;</p> <p>An outer ring of stations, one in each land-based meteorological sector in the 6- to 8-km range from the site; and</p> <p>The balance of the stations to be placed in special interest areas such as population centers, nearby residences, schools, and in one or two areas to serve as control stations.</p>	Quarterly	Gamma dose quarterly,

\*The number, media, frequency, and location of samples may vary from site to site. This table presents an acceptable minimum program for a site at which each entry is applicable. Local site characteristics must be examined to determine if pathways not covered by this table may significantly contribute to an individual's dose and should be included in the sample program.



TABLE 3.12.1-1(Cont'd)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>EXPOSURE PATHWAY AND/OR SAMPLE</u>	<u>NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS<sup>(1)</sup></u>	<u>SAMPLING AND COLLECTION FREQUENCY</u>	<u>TYPE AND FREQUENCY OF ANALYSIS</u>
<b>2. AIRBORNE</b>			
Radioiodine and Particulates	<p>Samples from 5 locations:</p> <p>Three samples from close to the SITE BOUNDARY locations, in different sectors, of a high calculated annual average ground-level D/Q.</p> <p>One sample from the vicinity of a community having a high calculated annual average ground-level D/Q; and</p> <p>One sample from a control location, as for example 15-30 km distant and in the least prevalent wind direction.</p>	<p>Continuous sampler operation with sample collection weekly or more frequently if required by dust loading.</p>	<p><u>Radioiodine Canister:</u> I-131 analysis weekly.</p> <p><u>Particulate Sampler</u> Gross beta radioactivity analysis following filter change<sup>(3)</sup>;</p> <p>Gamma isotopic analysis<sup>(4)</sup> of composites (by location) quarterly.</p>
<b>3. WATERBORNE</b>			
a. Surface <sup>(5)</sup>	<p>One sample upstream.</p> <p>One sample downstream.</p> <p>One sample outfall</p> <p>One sample cross-stream</p>	<p>Grab sample monthly.</p>	<p>Gamma isotopic analysis<sup>(4)</sup> monthly. Composite for tritium analysis quarterly.</p>

TABLE 3.12.1-1(Cont'd)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>EXPOSURE PATHWAY AND/OR SAMPLE</u>	<u>NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS<sup>(1)</sup></u>	<u>SAMPLING AND COLLECTION FREQUENCY</u>	<u>TYPE AND FREQUENCY OF ANALYSIS</u>
<b>3. WATERBORNE (Continued)</b>			
b. Ground	Samples from one or two sources only if likely to be affected <sup>(7)</sup> .	Monthly	Gamma isotopic analysis <sup>(4)</sup> monthly and tritium analysis quarterly.
c. Drinking	One sample of each of one to three of the nearest water supplies that could be affected by its discharge.  One sample from a control location.	Composite sample over two-week period <sup>(6)</sup> when I-131 analysis is performed; monthly composite otherwise.	I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year <sup>(8)</sup> . Composite for gross beta and gamma isotopic analysis <sup>(4)</sup> monthly. Composite for tritium analysis quarterly.
d. Sediment	One sample from downstream area One sample from cross-stream area One sample from outfall area One sample from upstream area	Semiannually	Gamma isotopic analysis <sup>(4)</sup> semiannually.

TABLE 3.12.1-1(Cont'd)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>EXPOSURE PATHWAY AND/OR SAMPLE</u>	<u>NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS<sup>(1)</sup></u>	<u>SAMPLING AND COLLECTION FREQUENCY</u>	<u>TYPE AND FREQUENCY OF ANALYSIS</u>
4. INGESTION			
a. Milk	Samples from milking animals in three locations within 5 km distance having the highest dose potential. If there are none, then, one sample from milking animals in each of three areas between 5 to 8 km distant where doses are calculated to be greater than 1 mrem per yr <sup>(8)</sup> .  One sample from milking animals at a control location 15 to 30 km distant.	Semimonthly when animals are on pasture, monthly at other time.	Gamma isotopic <sup>(4)</sup> and I-131 analysis semi-monthly when animals are on pasture; monthly at other times
b. Fish and Invertebrates	One sample of each commercially and recreationally important species in vicinity of plant discharge area.  One sample of same species in area not influenced by plant discharge.	Sample in season, or semiannually if they are not seasonal	Gamma isotopic analysis <sup>(4)</sup> on edible portions.

TABLE 3.12.1-1(Cont'd)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>EXPOSURE PATHWAY AND/OR SAMPLE</u>	<u>NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS<sup>(1)</sup></u>	<u>SAMPLING AND COLLECTION FREQUENCY</u>	<u>TYPE AND FREQUENCY OF ANALYSIS</u>
c. Food Products	One sample of each principal class of food products from any area that is irrigated by water in which liquid plant wastes have been discharged.	At time of harvest <sup>(9)</sup>	Gamma isotopic analysis <sup>(4)</sup> on edible portion.

**TABLE 3.12.1-1 (Continued)**

**TABLE NOTATIONS**

- (1) 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 3.12.1-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," 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 circumstances such as hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment, and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, 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 CONTROL 6.9.1.6. 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 specific 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 given in the ODCM. Pursuant to CONTROL 6.9.1.7, submit in the next Radioactive Effluent Release Report documentation for a change in the ODCM including revised figure(s) and table for the ODCM reflecting the new location(s) with supporting information identifying the cause of the unavailability of samples for the pathway and justifying the selection of the new location(s) for obtaining samples.
- (2) One or more instruments, such as 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 for measuring direct radiation. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used and should be selected to obtain optimum dose information with minimal fading.
- (3) 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 is greater than ten times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.
- (4) Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.

**TABLE 3.12.1-1 (Continued)**

**TABLE NOTATIONS**

- (5) The "upstream sample" shall be taken at a distance beyond significant influence of the discharge. The "downstream" sample shall be taken in an area beyond but near the mixing zone. "Upstream" samples in an estuary must be taken far enough upstream to be beyond the plant influence. Saltwater shall be sampled only when the receiving water is utilized for recreational activities.
- (6) A composite sample is one in which the quantity (aliquot) of liquid sampled is proportional to the quantity of flowing liquid and in which the method of sampling employed results in a specimen that is representative of the liquid flow. In this program composite sample aliquots shall be collected at time intervals that are very short relative to the compositing period in order to assure obtaining a representative sample.
- (7) Groundwater samples shall be taken when this source is tapped for drinking or irrigation purposes in areas where the hydraulic gradient or recharge properties are suitable for contamination.
- (8) The dose shall be calculated for the maximum organ and age group, using the methodology and parameters in the ODCM.
- (9) If harvest occurs more than once a year, sampling shall be performed during each discrete harvest. If harvest occurs continuously, sampling shall be monthly. Attention shall be paid to including samples of tuberous and root food products.

**TABLE 3.12.1-2: REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES****REPORTING LEVELS**

Analysis	Water (pCi/l)	Airborne Particulate or Gases (pCi/m <sup>3</sup> )	Fish (pCi/Kg, wet)	Milk (pCi/l)	Food Products (pCi/Kg, wet)
H-3	$3 \times 10^4$				
Mn-54	$1 \times 10^3$		$3 \times 10^4$		
Fe-59	$4 \times 10^2$		$1 \times 10^4$		
Co-58	$1 \times 10^3$		$3 \times 10^4$		
Co-60	$3 \times 10^2$		$1 \times 10^4$		
Zn-65	$3 \times 10^2$		$2 \times 10^4$		
Zr-Nb-95	$4 \times 10^2$				
I-131	2*	0.9		3	$1 \times 10^2$
Cs-134	30	10	$1 \times 10^3$	60	$1 \times 10^3$
Cs-137	50	20	$2 \times 10^3$	70	$2 \times 10^3$
Ba-La-140	$2 \times 10^2$			$3 \times 10^2$	

\* For drinking water samples. This is a 40 CFR Part 141 value. If no drinking water pathway exists, a value of 20 pCi/l may be used.

**TABLE 4.12.1-1: DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS<sup>(1), (2)</sup>****LOWER LIMITS OF DETECTION (LLD)<sup>(3)</sup>**

Analysis	Water (pCi/l)	Airborne Particulate or Gases (pCi/m <sup>3</sup> )	Fish (pCi/Kg, wet)	Milk (pCi/l)	Food Products (pCi/Kg, wet)	Sediment (pCi/Kg, dry)
gross beta	4	0.01				
H-3	3000					
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		

\* LLD for drinking water samples. If no drinking water pathway exists, a value of 10 pCi/l may be used.



TABLE 4.12.1-1 (Continued)

## TABLE NOTATIONS

- (1) 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 CONTROL 6.9.1.6.
- (2) Required detection capabilities for thermoluminescent dosimeters used for environmental measurements shall be in accordance with the recommendations of Regulatory Guide 4.13.
- (3) 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.

For a particular measurement system, which may include radiochemical separation:

$$LLD = \frac{4.66 \cdot s_b}{E \cdot V \cdot 2.22 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above, as picocuries per unit mass or volume,

$s_b$  is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate, as counts per minute,

E is the counting efficiency, as counts per disintegration,

V is the sample size in units of mass or volume,

2.22 is the number of disintegrations per minute per picocurie,

Y is the fractional radiochemical yield, when applicable,

$\lambda$  is the radioactive decay constant for the particular radionuclide ( $\text{sec}^{-1}$ ), and

$\Delta t$  for environmental samples is the elapsed time between sample collection, or end of the sample collection period, and time of counting (sec).

Typical values of E, V, Y, and  $\Delta t$  should be used in the calculation.

**TABLE 4.12.1-1 (Continued)****TABLE NOTATIONS**

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 CONTROL 6.9.1.6.

## RADIOLOGICAL ENVIRONMENTAL MONITORING

### 3/4.12.2 LAND USE CENSUS

#### CONTROLS

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3.12.2. In accordance with the Hope Creek Technical Specifications 6.8.4.h.2, a land use census shall be conducted and shall identify 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 50 m<sup>2</sup> (500 ft<sup>2</sup>) producing broad leaf vegetation.

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 4.11.2.3, identify the new location(s) in the next Radioactive Effluent Release Report, pursuant to CONTROL 6.9.1.7.
- b. With a land use census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) 20 percent greater than at a location from which samples are currently being obtained in accordance with CONTROL 3.12.1, 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. Pursuant to CONTROL 6.9.1.7, identify the new location(s) in the next Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).
- c. The provisions of CONTROLS 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.12.2 The land use census shall be conducted during the growing season at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, visual 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 CONTROL 6.9.1.6.

\*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/Q's in lieu of the garden census. CONTROLS for broadleaf vegetation sampling in Table 3.12.1-1, Part 4.c shall be followed, including analysis of control samples.

## RADIOLOGICAL ENVIRONMENTAL MONITORING

### 3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

#### CONTROLS

---

3.12.3 In accordance with Hope Creek Technical Specifications 6.8.4.h.3, analyses shall be performed on radioactive materials supplied as part of an Interlaboratory Comparison Program which has been approved by the Commission.

APPLICABILITY: At all times.

#### ACTION:

- a. 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 CONTROL 6.9.1.6.
- b. The provisions of CONTROLS 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

---

4.12.3 The Interlaboratory Comparison Program shall be described in the ODCM. A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report pursuant to CONTROL 6.9.1.6.

**BASES  
FOR  
SECTIONS 3.0 AND 4.0  
CONTROLS  
AND  
SURVEILLANCE REQUIREMENTS**

**NOTE**

The BASES contained in the succeeding pages summarize the reasons for the CONTROLS of Sections 3.0 and 4.0, but are not considered a part of these CONTROLS.

### 3/4.3 INSTRUMENTATION

#### BASES

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#### 3/4.3.7.10 RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

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 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.

#### 3/4.3.7.11 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

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. This will ensure 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.

### 3/4.11 RADIOACTIVE EFFLUENTS

#### BASES

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#### 3/4.11.1 LIQUID EFFLUENTS

##### 3/4.11.1.1 CONCENTRATION

This CONTROL is provided to ensure that the concentration of radioactive materials released in liquid waste effluents to UNRESTRICTED AREAS will be less than the concentration levels specified in 10 CFR Part 20, Appendix B, Table II, Column 2. This limitation provides additional 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 limits of 10 CFR Part 20.106(a) to the population. The concentration limit for dissolved or entrained noble gases is based upon the assumption that Xe-135 is the controlling radioisotope and its MPC in air (submersion) was converted to an equivalent concentration in water using the methods described in International Commission on Radiological Protection (ICRP) Publication 2.

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 the HASL Procedures Manual, HASL-300 (revised annually).

##### 3/4.11.1.2 DOSE

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 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 to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." Also, for freshwater 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 Purposes of Implementing Appendix I," April 1977.

## RADIOACTIVE EFFLUENTS

### BASES

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#### 3/4.11.1.3 LIQUID RADWASTE TREATMENT

The OPERABILITY of the liquid Radwaste treatment system ensures that this system will be available for use whenever liquid effluents require treatment prior to their release to the environment. 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 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 the Section II.A of Appendix I, 10 CFR Part 50, for liquid effluents.

#### 3/4.11.2 GASEOUS EFFLUENTS

##### 3/4.11.2.1 DOSE RATE

This CONTROL is provided to ensure that the dose at any time at and beyond the SITE BOUNDARY from gaseous effluents from all units on the site will be within the annual dose limits of 10 CFR Part 20 to UNRESTRICTED AREAS. The annual dose limits are the doses associated with the concentrations of 10 CFR Part 20, Appendix B, Table II, Column 1. These limits provide 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 within or outside the SITE BOUNDARY, to annual average concentrations exceeding the limits specified in Appendix B, Table II of 10 CFR Part 20 [10 CFR Part 20.106(b)]. For MEMBERS OF THE PUBLIC who may at times be within the SITE BOUNDARY, the occupancy of the individual will usually be sufficiently low to compensate for any increase in the atmospheric diffusion factor above 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 gamma and beta 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/yr 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.

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 the HASL Procedures Manual, HASL-300 (revised annually).



**RADIOACTIVE EFFLUENTS****BASES****3/4.11.2.2 DOSE - NOBLE GASES**

This CONTROL is provided to implement the requirements of Section II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The CONTROL implements 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 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.

**3/4.11.2.3 DOSE - IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM**

This CONTROL is provided to implement the requirements of Section 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 material in gaseous effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." The ODCM calculational methods specified in 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 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, iodine-133, tritium, and radionuclides in particulate form with half-life greater than 8 days are dependent on 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, and 4) deposition on the ground with subsequent exposure of man.

**RADIOACTIVE EFFLUENTS****BASES****3/4.11.2.4 AND 3/4.11.2.5 GASEOUS RADWASTE TREATMENT AND VENTILATION EXHAUST TREATMENT**

The OPERABILITY of the GASEOUS RADWASTE TREATMENT SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM ensures that the system will be available for use whenever gaseous effluents require treatment prior to release to the environment. The requirement that the appropriate portions of these systems be used, when specified, provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable." This CONTROL implements the requirements of 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 Section II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

**3/4.11.2.8 VENTING OR PURGING**

This CONTROL provides reasonable assurance that releases from drywell venting or purging operations will not exceed the annual dose limits of 10 CFR Part 20 for UNRESTRICTED AREAS.

**3/4.11.4 TOTAL DOSE**

This CONTROL is provided to meet the dose limitations of 40 CFR Part 190 that have now been incorporated into 10 CFR Part 20 by 46 FR 18525. The CONTROL requires the preparation and submittal of a Special Report whenever the calculated doses from plant radioactive effluents exceed 25 mrem to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrem. 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 including outside storage tanks, etc. 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 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, the Special Report 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 and 10 CFR Part 20.405c, 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 Part 20, as addressed in CONTROLS 3.11.1.1 and 3.11.2.1. 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.

### 3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

#### BASES

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#### 3/4.12.1 MONITORING PROGRAM

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. Guidance for this monitoring program is provided by the Radiological Assessment Branch Position on Environmental Monitoring, Revision 1, November 1979. The initially specified monitoring program will be effective for at least the first three years of commercial operation. Following this period, 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 4.12.1-1 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.

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 the HASL Procedures Manual, HASL-300 (revised annually).

#### 3/4.12.2 LAND USE CENSUS

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, from visual survey or 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 50m<sup>2</sup> 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<sup>2</sup>.

### 3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

#### BASES

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#### 3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

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 valid for the purposes of Section IV.B.2 of Appendix I to 10 CFR Part 50.

**SECTION 5.0**  
**DESIGN FEATURES**

## **5.0 DESIGN FEATURES**

**(Provided FOR INFORMATION ONLY. Technical Specifications Section 5.0 is controlling.)**

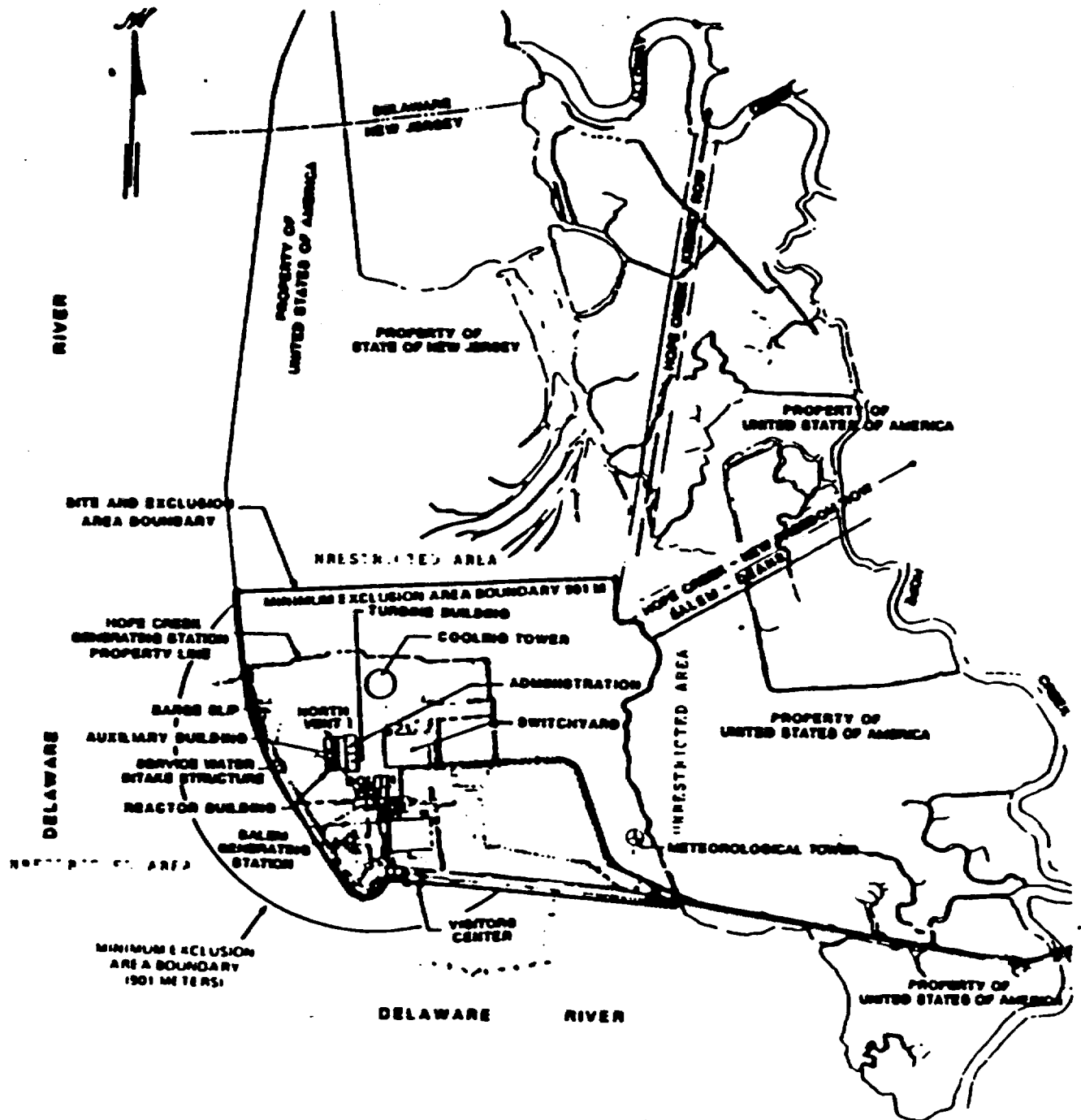
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### **5.1 SITE**

#### **MAP DEFINING UNRESTRICTED AREAS AND SITE BOUNDARY FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS**

**5.1.1 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 as shown in Figure 5.1.1-1.**

FIGURE 5.1.1-1 AREA PLOT PLAN OF SITE



## **6.0 ADMINISTRATIVE CONTROLS**

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### **6.9.1.6 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT**

**6.9.1.6** In accordance with Hope Creek Technical Specifications 6.9.1.6, routine radiological environmental operating reporting\* covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, with operational controls (as appropriate), and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by CONTROL 3.12.2. If harmful effects or evidence of irreversible damage are detected by the monitoring, the report shall provide an analysis of the problem and a planned course of action to alleviate the problem.

The Annual Radiological Environmental Operating Reports shall include summarized and tabulated results in the format of Regulatory Guide 4.8, December 1975 of all the radiological environmental samples taken during the report period. Deviations from the sampling program identified in CONTROL 3.12.1 shall be reported. 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.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps, one covering sampling locations near the SITE BOUNDARY and a second covering the more distant locations, all keyed to a table giving distances and directions from one reactor; the results of licensee participation in the Interlaboratory Comparison Program, as required by CONTROL 3.12.3.

The report shall also include the results of specific activity analysis in which the primary coolant exceeded the limits of Technical Specification 3.4.5. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 per gram as a function of time for the duration of the specific activity of the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the limit.

\* A single submittal may be made for a multiple unit site. The submittal should combine those sections that are common to all units at the site.



## **6.0 ADMINISTRATIVE CONTROLS**

### **6.9.1.7 RADIOACTIVE EFFLUENT RELEASE REPORT**

6.9.1.7 In accordance with Hope Creek Technical Specifications 6.9.1.7, routine radioactive effluent release reports\* covering the operation of the unit shall be submitted by May 1 of each year and in accordance with the requirements of 10CFR50.36a.

The Radioactive Effluent Release Report shall include 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.

The Radioactive Effluent Release Report shall include 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 of wind speed, wind direction, atmospheric stability, and precipitation (if measured) on magnetic tape, or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. The report shall include 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. The report shall also include 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 (Figure 5.1.1-1) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The historical annual average meteorology or the meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents (as determined by sampling frequency and measurement) shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

The Radioactive Effluent Release Report shall identify those radiological environmental sample parameters and locations where it is not possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In addition, the cause of the unavailability of samples for the pathway and the new location(s) for obtaining replacement samples should be identified. The report should also include a revised figure(s) and table(s) for the ODCM reflecting the new location(s).

The Radioactive Effluent Release Report shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources (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.

The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

- 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. Type of waste (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).

## **ADMINISTRATIVE CONTROLS**

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### **6.9.1.7 RADIOACTIVE EFFLUENT RELEASE REPORT (Continued)**

The Radioactive Effluent Release Report shall include unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents on a quarterly basis.

The Radioactive Effluent Release Report shall include any changes to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), or radioactive waste systems made during the report period.

- \* 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.

## **ADMINISTRATIVE CONTROLS**

### **6.15 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS**

#### **6.15.1 Licensee initiated major changes to the radioactive waste system (liquid, gaseous and solid):**

1. Shall be reported to the Commission in the UFSAR for the period in which the evaluation was reviewed by the Station Operations Review Committee (SORC). The discussion of each change shall contain:
  - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10CFR50.59;
  - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
  - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
  - d. 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;
  - e. An evaluation of the change, which shows the expected maximum exposures to individual in the unrestricted area and to the general population that differ from those previously estimated in the license application and amendments thereto;
  - f. 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;
  - g. An estimate of the exposure to plant operating personnel as a result of the change; and
  - h. Documentation of the fact that the change was reviewed and found acceptable by the SORC.
2. Shall become effective upon review and acceptance by the SORC.

## PART II – CALCULATIONAL METHODOLOGIES

## 1.0 LIQUID EFFLUENTS

### 1.1 Radiation Monitoring Instrumentation and Controls

The liquid effluent monitoring instrumentation and controls at Hope Creek for controlling and monitoring normal radioactive material releases in accordance with the Hope Creek Radiological Effluent Technical Specifications are summarized as follows:

- (1) Alarm (and Automatic Termination) - Liquid Radwaste Discharge Line Monitor provides the alarm and automatic termination of liquid (RE4861) radioactive material releases from the liquid waste management system as required by CONTROL 3.3.7.10.

Circulating Water Dewatering Sump Discharge Monitor (RE4557) provides alarm and automatic termination of liquid radioactive releases from the circulating dewatering sump as required by CONTROL 3.3.7.10. Condensation drains from certain supply ventilation units and liquids from the fill and venting of the circulating water side of the condenser waterboxes are directed to this sump. Automatic termination is performed by trip of the sump pumps on high gamma radiation signal.

- (2) Alarm (Only) - The Cooling-Tower Blowdown Effluent Monitor (RE8817) provides an Alarm function only for releases into the environment as required by CONTROL 3.3.7.10.

Liquid radioactive waste flow diagrams with the applicable, associated radiation monitoring instrumentation and controls are presented in Figure 1-1.

### 1.2 Liquid Effluent Monitor Setpoint Determination

Per the requirements of CONTROL 3.3.7.10, alarm setpoints shall be established for the liquid monitoring instrumentation to ensure that the release concentration limits of CONTROL 3.11.1.1 are met (i.e., the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS shall be limited to the concentrations specified in 10 CFR 20 Appendix B, Table II, Column 2, (Appendix F) for radionuclides and  $2.0\text{E-}04$   $\mu\text{Ci/ml}$  for dissolved or entrained noble gases). The following equation (adopted from NUREG-0133) must be satisfied to meet the liquid effluent restrictions:

$$c \leq \frac{C(F + 1)}{f} \quad (1.1)$$

where:

- C = the effluent concentration limit of CONTROL 3.11.1.1 implementing the 10 CFR 20 MPC (Appendix F) for the site, in  $\mu\text{Ci/ml}$ .
- c = the setpoint, in  $\mu\text{Ci/ml}$ , of the radioactivity monitor measuring the radioactivity concentration in the effluent line prior to dilution and subsequent release; the setpoint, represents a value which, if exceeded, would result in concentrations exceeding the limits of 10 CFR 20 in the UNRESTRICTED AREA.

- $f$  = the flow rate at the radiation monitor location, in volume per unit time, but the same units as  $F$ , below.
- $F$  = the dilution water flow rate as measured prior to the release point, in volume per unit time.

[Note that if no dilution is provided,  $c \leq C$ . Also, note that when  $(F)$  is large compared to  $(f)$ , then  $(F + f) = F$ .]

### 1.2.1 Liquid Effluent Monitors

The setpoints for the liquid effluent monitors at the Hope Creek Generating Station are determined by the following equation:

$$SP \leq \frac{MPC_e * CTBD * [1 - CF]}{RR} + bkg \quad (1.2)$$

with:

$$MPC_e = \frac{\sum_i C_i(\text{gamma})}{\sum_i \frac{C_i}{MPC_i}(\text{gamma})} \quad (1.3)$$

where:

- $SP$  = alarm setpoint corresponding to the maximum allowable release rate ( $\mu\text{Ci/ml}$ ).
- $MPC_e$  = an effective MPC value for the mixture of radionuclides in the effluent stream, ( $\mu\text{Ci/ml}$ ).
- $C_i$  = the concentration of radionuclide in the liquid effluent ( $\mu\text{Ci/ml}$ ).
- $MPC_i$  = the MPC value corresponding to radionuclide  $i$  from (Appendix F) 10 CFR 20, Appendix B, Table II, Column 2 ( $\mu\text{Ci/ml}$ ).
- $CTBD$  = the Cooling-Tower Blowdown Discharge rate at the time of release (gal/min).
- $RR$  = the liquid effluent release rate (gal/min) at the monitor location (i.e., at the liquid radwaste monitor, at the TBCW monitor, or at the CTBD monitor).
- $bkg$  = the background of the monitor ( $\mu\text{Ci/ml}$ ).
- $CF$  = Correction factor to account for non-gamma emitting nuclides and radiation monitor inaccuracies.

The radioactivity monitor setpoint equation (1.2) remains valid during outages when the Cooling-Tower Blowdown discharge is potentially at its lowest value. Reduction of the waste stream flow ( $RR$ ) may be necessary during these periods to meet the discharge criteria. Procedural restrictions prevent simultaneous batch liquid releases. The setpoints should be reduced to allow for potential or actual concurrent continuous releases such that the limits of ODCM CONTROL 3.11.1.1 are not exceeded.

### 1.2.2 Conservative Default Values

Conservative alarm setpoints for liquid radwaste radiation monitors may be determined through the use of default parameters. Table 1-1 summarizes all current default values in use for Hope Creek. They are based upon the following:

- (a) substitution of the effective MPC value with a default value of 4.09E-05  $\mu\text{Ci/ml}$  for radwaste releases (Refer to Appendix A for justification);
- (b) substitutions of the Cooling-Tower Blowdown discharge rate with the minimum average flow, in gal/min; and,
- (c) substitutions of the effluent release rate with the highest allowed rate, in gal/min.
- (d) substitution of a 0.8 correction factor (CF) to account for monitor inaccuracies and non-gamma emitting radionuclides.

The use of the conservative alarm setpoint, or a setpoint below the conservative value, is acceptable provided that the value used is at least as conservative as the release specific setpoint calculated in accordance with Equation 1.2 above. Procedural controls exist to verify the setpoint utilized is at or below what is required.

### 1.3 Liquid Effluent Concentration Limits - 10 CFR 20

CONTROL 3.11.1.1 limits the concentration of radioactive material in liquid effluents (after dilution in the Cooling-Tower Blowdown Discharge System) to less than the concentrations as specified in 10 CFR 20, Appendix B, Table II, Column 2 (Appendix F) for radionuclides other than noble gases. Noble gases are limited to a diluted concentration of 2.0E-04  $\mu\text{Ci/ml}$ . Release rates are controlled and radiation monitor alarm setpoints are established as addressed above to ensure that these concentration limits are not exceeded. However, in the event any liquid release results in an alarm setpoint being exceeded, an evaluation of compliance with the concentration limits of CONTROL 3.11.1.1 may be performed using the following equation:

$$\frac{C_i}{MPC_i} * \frac{RR}{CTBD + RR} \leq 1 \quad (1.4)$$

where:

- $C_i$  = actual concentration of radionuclide i as measured in the undiluted liquid effluent ( $\mu\text{Ci/ml}$ ).
- $MPC_i$  = the MPC value corresponding to radionuclide i from 10 CFR 20, Appendix B, Table II, Column 2 (Appendix F) ( $\mu\text{Ci/ml}$ ).
- = 2E-04  $\mu\text{Ci/ml}$  for dissolved or entrained noble gases.
- RR = the actual liquid effluent release rate (gal/min)
- CTBD = the actual Cooling-Tower Blowdown discharge at the time of release (gal/min).

**1.4 Liquid Effluent Dose Calculation - 10 CFR 50****1.4.1 MEMBER OF THE PUBLIC Dose - Liquid Effluents**

CONTROL 3.11.1.2 limits the dose or dose commitment to MEMBERS OF THE PUBLIC from radioactive materials in liquid effluents from Hope Creek Generating Station to:

- during any calendar quarter:

≤ 1.5 mrem to total body

≤ 5.0 mrem to any organ

- during any calendar year:

≤ 3.0 mrem to total body

≤ 10.0 mrem to any organ

Per the surveillance requirements to CONTROL 4.11.1.2, the following calculation methods shall be used for determining the dose or dose commitment due to the liquid radioactive effluents from Hope Creek.

$$D_o = \frac{8.35E-04 * VOL}{CTBD} * \sum_i C_i * A_{io} \quad (1.5)$$

where:

- $D_o$  = dose or dose commitment to organ o, including total body (mrem).  
 $A_{io}$  = site-related ingestion dose commitment factor to the total body or any organ o for radionuclide i (mrem/hr per  $\mu\text{Ci/ml}$ ).  
 $C_i$  = average concentration of radionuclide i, in undiluted liquid effluent representative of volume VOL ( $\mu\text{Ci/ml}$ ).  
 VOL = volume of liquid effluent released (gal).  
 CTBD = Average Cooling-Tower Blowdown discharge rate during release period (gal/min).  
 8.35E-04 = conversion factor (1.67E-2 hr/min) and a near field dilution factor of 0.05 (refer to Appendix B for definition).



The site-related ingestion dose/dose commitment factors ( $A_{io}$ ) are presented in Table 1-2 and have been derived in accordance with NUREG-0133 by the equation:

$$A_{io} = 1.14E+05 [(UI * BI_i) + (UF * BF_i)] Df_{io} \quad (1.6)$$

where:

- $A_{io}$  = composite dose parameter for the total body or critical organ o of an adult for radionuclide i, for the fish and invertebrate ingestion pathways (mrem/hr per  $\mu\text{Ci/ml}$ ).
- $1.14E+05$  = conversion factor ( $\text{pCi}/\mu\text{Ci} * \text{ml/kg per hr/yr}$ ).
- $UI$  = adult invertebrate consumption (5 kg/yr).
- $BI_i$  = bioaccumulation factor for radionuclide i in invertebrates from Table 1-3 ( $\text{pCi/kg per pCi/l}$ ).
- $UF$  = adult fish consumption (21 kg/yr).
- $BF_i$  = bioaccumulation factor for nuclide i in fish from Table 1-3 ( $\text{pCi/kg per pCi/l}$ ).
- $Df_{io}$  = dose conversion factor for nuclide i for adults in preselected organ, o, from Table E-11 of Regulatory Guide 1.109 (mrem/pCi).

The radionuclides included in the periodic dose assessment per the requirements of CONTROL 3/4.11.1.2 are those as identified by gamma spectral analysis of the liquid waste samples collected and analyzed per the requirements of CONTROL 3/4.11.1.1, Table 4.11.1.1.1-1.

Radionuclides requiring radiochemical analysis (e.g., Sr-89 and Sr-90) will be added to the dose analysis at a frequency consistent with the required minimum analysis frequency of CONTROL Table 4.11.1.1.1-1.

#### 1.4.2 Simplified Liquid Effluent Dose Calculation

In lieu of the individual radionuclide dose assessment as presented in Section 1.4.1, the following simplified dose calculation equation may be used for demonstrating compliance with the dose limits of CONTROL 3.11.1.2. (Refer to Appendix B for the derivation and justification for this simplified method.)

##### Total Body

$$D_{tb} = \frac{1.94E+02 * VOL}{CTBD} * \sum_i C_i \quad (1.7)$$

##### Maximum Organ

$$D_{max o} = \frac{5.28E+02 * VOL}{CTBD} * \sum_i C_i \quad (1.8)$$

where:

- $D_{tb}$  = conservatively evaluated total body dose (mrem).  
 $D_{max\ o}$  = evaluated maximum organ dose (mrem).  
 $C_i$  = average concentration of radionuclide i, in undiluted liquid effluent representative of the volume VOL ( $\mu\text{Ci/ml}$ ).  
VOL = volume of liquid effluent released (gal).  
CTBD = average Cooling-Tower Blowdown discharge rate during release period (gal/min).  
 $1.94\text{E}+02$  = conversion factor ( $1.67\text{E}-2$  hr/min), the conservative total body ingestion dose commitment factor ( $\text{Zn-65} = 2.32\text{E}+5$  mrem/hr per  $\mu\text{Ci/ml}$ ), and the near field dilution factor of 0.05. (See Appendix B)  
 $5.28\text{E}+02$  = conversion factor ( $1.67\text{E}-2$  hr/min), the conservative maximum organ ingestion dose commitment factor ( $\text{Fe-59, GI-LLI} = 6.32\text{E}+5$  mrem/hr per  $\mu\text{Ci/ml}$ ), and the near field dilution factor of 0.05 (See Appendix B).

### 1.5 Liquid Effluent Dose Projections

CONTROL 3.11.1.3 requires that the liquid radioactive waste processing system be used to reduce the radioactive material levels in the liquid waste prior to release when the 31-day projected doses exceed:

- 0.06 mrem to the total body, or

- 0.2 mrem to any organ.

The applicable liquid waste processing system for maintaining radioactive material releases ALARA are the drain filters and demineralizers as delineated in Figure 1-1.

Dose projections are made at least once per 31-days by the following equations:

$$D_{tbp} = (D_{tb} / d) * 31d \quad (1.9)$$

$$D_{maxp} = (D_{max} / d) * 31d \quad (1.10)$$

where:

- $D_{tbp}$  = the total body dose projection for current 31-day period (mrem).  
 $D_{tb}$  = the total body dose to date for current calendar quarter as determined by equation (1.5) or (1.7).  
 $D_{maxp}$  = the maximum organ dose to date for current calendar quarter as determined by equation (1.5) or (1.8) (mrem).  
d = the number of days in current calendar quarter at the end of the release.  
31d = the number of days of concern.

## **1.6 Representative Samples**

A sample should be representative of the bulk stream or volume of effluent from which it is taken. Prior to sampling, large volumes of liquid waste should be mixed in as short a time interval as practicable to assure that any sediments or particulate solids are distributed uniformly in the waste mixture. Recirculation pumps for liquid waste tanks (collection or sample test tanks) should be capable of recirculating at a rate of not less than two tank volumes in eight hours. Minimum recirculation times and methods of recirculation are controlled by specific plant procedures.

## **2.0 GASEOUS EFFLUENTS**

### **2.1 Radiation Monitoring Instrumentation and Controls**

The gaseous effluent monitoring instrumentation and controls at Hope Creek for controlling and monitoring normal radioactive material releases in accordance with the Radiological Effluent CONTROLS are summarized as follows:

(1) **Filtration, Recirculation, and Ventilation System -**

The FRVS is maintained in a standby condition. Upon reactor building isolation, the FRVS recirculation system recirculates the reactor building air through HEPA and charcoal filters. Releases are made to the atmosphere via a reactor building vent or the South Plant Vent depending on mode of operation. Noble gas monitoring is provided by RE-4811A.

(2) **South Plant Vent -**

The SPV receives discharge from the radwaste evaporator, reactor building purge, auxiliary building radwaste area, condensate demineralizer, pipe chase, feedwater heater, and untreated ventilation sources. Effluents are monitored (for noble gas) by the RE-4875B monitor.

(3) **North Plant Vent -**

The NPV receives discharge from the gaseous radwaste treatment system (Offgas system) and untreated ventilation air sources. Effluents are monitored (for noble gases) by the RE-4573B monitor.

Gaseous radioactive waste flow diagrams with the applicable, associated radiation monitoring instrumentation controls are presented in Figures 2-1 and 2-2.

## 2.2 Gaseous Effluent Monitor Setpoint Determination

### 2.2.1 Plant Vent, FRVS

Per the requirements of CONTROL 3.3.7.11, alarm setpoints shall be established for the gaseous effluent monitoring instrumentation to ensure that the release rate of noble gases does not exceed the limits of CONTROL 3.11.2.1, which corresponds to a dose rate at the SITE BOUNDARY of 500 mrem/year to the total body or 3000 mrem/year to the skin. Based on a grab sample analysis of the applicable release (i.e., of FRVS, pipe chase, gaseous radwaste treatment system air, etc.), the radiation monitoring alarm setpoints may be established by the following calculation method. The measured radionuclide concentrations and release rate are used to calculate the fraction of the allowable release rate, as limited by CONTROL 3.11.2.1, by the equation:

$$FRAC = \left[ 4.72E+02 * X/Q * VF * \sum_i (C_i * K_i) \right] / 500 \quad (2.1)$$

$$FRAC = \left[ 4.72E+02 * X/Q * VF * \sum_i (C_i * (L_i + 1.1M_i)) \right] / 3000 \quad (2.2)$$

where:

FRAC = fraction of the allowable release rate based on the identified radionuclide concentrations and the release flow rate.

X/Q = annual average meteorological dispersion to the controlling site boundary location (sec/m<sup>3</sup>).

VF = ventilation system flow rate for the applicable release point and monitor (ft<sup>3</sup>/min).

C<sub>i</sub> = concentration of noble gas radionuclide i as determined by radioanalysis of grab sample (uCi/cm<sup>3</sup>)

K<sub>i</sub> = total body dose conversion factor for noble gas radionuclide i (mrem/yr per μCi/m<sup>3</sup>), from Table 2-1

L<sub>i</sub> = beta skin dose conversion factor for noble gas radionuclide i (mrem/yr per μCi/m<sup>3</sup>), from Table 2-1

M<sub>i</sub> = gamma air dose conversion factor for noble gas radionuclide i (mrad/yr per μCi/m<sup>3</sup>), from Table 2-1

1.1 = mrem skin dose per mrad gamma air dose (mrem/mrad)

4.72E+02 = conversion factor (cm<sup>3</sup>/ft<sup>3</sup> \* min/sec)

500 = total body dose rate limit (mrem/yr)

3000 = skin dose rate limit (mrem/yr)

Based on the more limiting FRAC (i.e., higher value) as determined above, the alarm setpoints for the applicable monitors may be calculated by the equation:

$$SP \leq \left[ AF * \sum_i C_i / FRAC \right] + bkg \quad (2.3)$$

where:

SP = alarm setpoint corresponding to the maximum allowable release rate ( $\mu\text{Ci/cc}$ ).  
 FRAC = highest fraction of the allowable release rate as determined in equation (2.2).  
 bkg = background of the monitor ( $\mu\text{Ci/cc}$ ).  
 AF = administrative allocation factor for the specific monitor (0.2 NPV, 0.2 SPV, 0.1 FRVS).

The allocation factor (AF) is an administrative control imposed to ensure that combined releases from Salem Units 1 and 2 and Hope Creek will not exceed the regulatory limits on release rate from the site (i.e., the release rate limits of CONTROL 3.11.2.1). Normally, the combined AF value for Salem Units 1 and 2 is 0.5 (0.25 per unit), with the remainder 0.5 allocated to Hope Creek. Any increase in AF above 0.5 for the Hope Creek Generating Station will be coordinated with the Salem Generating Station to ensure that the combined allocation factors for all units do not exceed 1.0.

### 2.2.2 Conservative Default Values

A conservative alarm setpoint can be established, in lieu of the individual radionuclide evaluation based on the grab sample analysis, to eliminate the potential of periodically having to adjust the setpoint to reflect minor changes in radionuclide distribution and variations in release flow rate. The alarm setpoint may be conservatively determined by the default values presented in Table 2-2.

These values are based upon:

- the maximum ventilation (or purge) flow rate;
- a radionuclide distribution adopted from ANSI N237- 1976/ANS 18.1 "Source Term Specifications", Table 5 and;
- an administrative allocation factor of 0.5 to conservatively ensure that any releases from Hope Creek do not exceed the maximum allowable release rate.

For the noble gas radionuclide distribution from ANSI N237-1976/ANS 18.1 (Note Table C-1), the alarm setpoint based on the total body dose rate is more restrictive than the corresponding setpoint based on the skin dose rate. The resulting conservative, default setpoints are presented in Table 2-2.

## 2.3 Gaseous Effluent Instantaneous Dose Rate Calculations - 10 CFR 20

### 2.3.1 Site Boundary Dose Rate - Noble Gases

CONTROL 3.11.2.1a limits the dose rate at the SITE BOUNDARY due to noble gas releases to  $\leq 500$  mrem/yr, total body and  $\leq 3000$  mrem/yr, skin. Radiation monitor alarm setpoints are established to ensure that these release limits are not exceeded. In the event any gaseous releases from the station results in an alarm setpoint (as determined in Section 2.2.1) being exceeded, an evaluation of the SITE BOUNDARY dose rate resulting from the release shall be performed using the following equations:

$$D_{tb} = \lambda/Q * \sum_i (K_i * Q_i) \quad (2.4)$$

$$D_s = \lambda/Q * \sum_i ((L_i + 1.1M_i) * Q_i) \quad (2.5)$$

where:

- $D_{tb}$  = total body dose rate (mrem/yr).
- $D_s$  = skin dose rate (mrem/yr).
- $X/Q$  = atmospheric dispersion to the controlling SITE BOUNDARY location (sec/m<sup>3</sup>).
- $Q_i$  = average release rate of radionuclide i over the release period under evaluation ( $\mu$ Ci/sec).
- $K_i$  = total body dose conversion factor for noble gas radionuclide i (mrem/yr per  $\mu$ Ci/m<sup>3</sup>), from Table 2-1
- $L_i$  = beta skin dose conversion factor for noble gas radionuclide i (mrad/yr per  $\mu$ Ci/m<sup>3</sup>), from Table 2-1
- $M_i$  = gamma air dose conversion factor for noble gas radionuclide i (mrad/yr per  $\mu$ Ci/m<sup>3</sup>), from Table 2-1.
- 1.1 = mrem skin dose per mrad gamma air dose (mrem/mrad)

As appropriate, simultaneous releases from Salem Units 1 and 2 and Hope Creek will be considered in evaluating compliance with the release rate limits of CONTROL 3.11.2.1a, following any releases exceeding the above prescribed alarm setpoints. Monitor indications (readings) may be averaged over a time period not to exceed 15 minutes when determining noble gas release rate based on correlation of the monitor reading and monitor sensitivity. The 15-minute averaging is needed to allow for reasonable monitor response to potentially changing radioactive material concentrations and to exclude potential electronic spikes in monitor readings that may be unrelated to radioactive material releases. As identified, any electronic spiking monitor responses may be excluded from the analysis.

**NOTE:** For administrative purposes, more conservative alarm setpoints than those as prescribed above may be imposed. However, conditions exceeding these more limiting alarm setpoints do not necessarily indicate radioactive material release rates exceeding the dose limits of CONTROL 3.11.2.1a. Provided actual releases do not result in radiation monitor indications exceeding alarm setpoint values based on the above criteria, no further analyses are required for demonstrating compliance with the limits of CONTROL 3.11.2.1a.

Actual meteorological conditions concurrent with the release period or the default, annual average dispersion parameters as presented in Table 2-3 may be used for evaluating the gaseous effluent dose rate.

### 2.3.2 Site Boundary Dose Rate - Radioiodine and Particulates

CONTROL 3.11.2.1b limits the dose rate to  $\leq 1500$  mrem/yr to any organ for I-131, I-133, tritium and particulates with half-lives greater than 8 days. To demonstrate compliance with this limit, an evaluation is performed at a frequency no greater than that corresponding to the sampling and analysis time period (e.g., nominally once per 7 days). The following equation shall be used for the dose rate evaluation:

$$D_o = X/Q * \sum_i (R_{io} * Q_i) \quad (2.6)$$

where:

- $D_o$  = average organ dose rate over the sampling time period (mrem/yr).
- $X/Q$  = atmospheric dispersion to the controlling SITE BOUNDARY location for the inhalation pathway (sec/m<sup>3</sup>).
- $R_{io}$  = dose parameter for radionuclide  $i$  (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ) and organ  $o$  for the child inhalation pathway from Table 2-4.
- $Q_i$  = average release rate over the appropriate sampling period and analysis frequency for radionuclide  $i$  - - I-131, I-133, tritium or other radionuclide in particulate form with half- life greater than 8 days ( $\mu\text{Ci}/\text{sec}$ ).

By substituting 1500 mrem/yr for  $D_o$  and solving for  $Q$ , an allowable release rate for I-131 can be determined. Based on the annual average meteorological dispersion (See Table 2-3) and the most limiting potential pathway, age group and organ (inhalation, child, thyroid --  $R_i = 1.62\text{E}+07$  mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ), the allowable release rate for I-131 is 34.7  $\mu\text{Ci}/\text{sec}$ . Reducing this release rate by a factor of 2 to account for potential dose contributions from other radioactive particulate material and other release points (e.g., Salem), the corresponding release rate allocated to Hope Creek is 17.4  $\mu\text{Ci}/\text{sec}$ . For a 7-day period, which is the nominal sampling and analysis frequency for I-131, the cumulative release is 10.5 Ci.

Therefore, as long as the I-131 release in any 7-day period do not exceed 10.5 Ci, no additional analyses are needed for verifying compliance with the CONTROL 3.11.2.1.b limits on allowable release rate.

## 2.4 Noble Gas Effluent Dose Calculations - 10 CFR 50

### 2.4.1 UNRESTRICTED AREA Dose - Noble Gases

CONTROL 3.11.2.2 requires a periodic assessment of releases of noble gases to evaluate compliance with the quarterly dose limits of  $\leq 5$  mrad, gamma-air and  $\leq 10$  mrad, beta-air and the calendar year limits  $\leq 10$  mrad, gamma-air and  $\leq 20$  mrad, beta-air.

The limits are applicable separately to each generating station and are not combined site limits. The following equations shall be used to calculate the gamma-air and beta-air doses:

$$D_{\gamma} = 3.17E-08 * \chi/Q * \sum_i (M_i * Q_i) \quad (2.7)$$

$$D_{\beta} = 3.17E-08 * \chi/Q * \sum_i (N_i * Q_i) \quad (2.8)$$

where:

$D_{\gamma}$	=	air dose due to gamma emissions for noble gas radionuclides (mrad).
$D_{\beta}$	=	air dose due to beta emissions for noble gas radionuclides (mrad).
$\chi/Q$	=	atmospheric dispersion to the controlling SITE BOUNDARY location (sec/m <sup>3</sup> ).
$Q_i$	=	cumulative release of noble gas radionuclide i over the period of interest ( $\mu$ Ci).
$M_i$	=	air dose factor due to gamma emission from noble gas radionuclide i (mrad/yr per $\mu$ Ci/m <sup>3</sup> , from Table 2-1).
$N_i$	=	air dose factor due to beta emissions from noble gas radionuclide i (mrad/yr per $\mu$ Ci/m <sup>3</sup> , Table 2-1).
3.17E-08	=	conversion factor (yr/sec).

#### 2.4.2 Simplified Dose Calculation for Noble Gases

In lieu of the individual noble gas radionuclide dose assessment as presented above, the following simplified dose calculation equations may be used for verifying compliance with the dose limits of CONTROL 3.11.2.2 (Refer to Appendix C for the derivation and justification of this simplified method).

$$D_{\gamma} = \frac{3.17E-8}{0.50} * \chi/Q * M_{eff} * \sum_i Q_i \quad (2.9)$$

$$D_{\beta} = \frac{3.17E-8}{0.50} * \chi/Q * N_{eff} * \sum_i Q_i \quad (2.10)$$

where:

$M_{eff}$	=	8.1E+03, effective gamma-air dose factor (mrad/yr per $\mu$ Ci/m <sup>3</sup> ).
$N_{eff}$	=	8.5E+03, effective beta-air dose factor (mrad/yr per $\mu$ Ci/m <sup>3</sup> ).
$Q_i$	=	cumulative release for all noble gas radionuclides ( $\mu$ Ci).
0.50	=	conservatism factor to account for potential variability in the radionuclide distribution.

Actual meteorological conditions concurrent with the release period or the default, annual average dispersion parameters as presented in Table 2-3, may be used for the evaluation of the gamma-air and beta-air doses.



## 2.5 Radioiodine and Particulate Dose Calculations - 10 CFR 50

### 2.5.1 UNRESTRICTED AREA Dose - Radioiodine and Particulates

In accordance with the requirements of CONTROL 3.11.2.3, a periodic assessment shall be performed to evaluate compliance with the quarterly dose limit  $\leq 15$  mrem to any organ. The following equation shall be used to evaluate the maximum organ dose due to release of I-131, I-133, tritium and particulates with half-lives greater than 8 days:

$$D_{aop} = 3.17E-08 * W * SF_p * \sum_i (R_{iaop} * Q_i) \quad (2.11)$$

where:

- $D_{aop}$  = dose or dose commitment via all pathways p and age group a (as identified in Table 2-3) to organ o, including the total body (mrem).
- $W$  = atmospheric dispersion parameter to the controlling location(s) as identified in Table 2-3.
- $X/Q$  = atmospheric dispersion for inhalation pathway and H-3 dose contribution via other pathways (sec/m<sup>3</sup>).
- $D/Q$  = atmospheric deposition for vegetation, milk and ground plane exposure pathways (1/m<sup>2</sup>).
- $R_{iaop}$  = dose factor for radionuclide i (mrem/yr per  $\mu\text{Ci}/\text{m}^3$  or m<sup>2</sup> - mrem/yr per  $\mu\text{Ci}/\text{sec}$ ) and organ o from Table 2-4 for each age group a and the applicable pathway p as identified in Table 2-3. Values for  $R_{iaop}$  were derived in accordance with the methods described in NUREG-0133.
- $Q_i$  = cumulative release over the period of interest for radionuclide i -- I-131, I-133, H-3 or radioactive material in particulate form with half-life greater than 8 days ( $\mu\text{Ci}$ ).
- $Sf_p$  = annual seasonal correction factor to account for fraction of the year that the applicable exposure pathway does not exist.

(1) For milk and vegetation exposure pathways:

= A six month fresh vegetation and grazing season (May through October) = 0.5

(2) For inhalation and ground plane exposure pathways:

= 1.0

For evaluating the maximum exposed individual, the infant age group is controlling for the milk pathway. Only the controlling age group as identified in Table 2-3 need be evaluated for compliance with CONTROL 3.11.2.3.

### 2.5.2 Simplified Dose Calculation for Radioiodines and Particulates

In lieu of the individual radionuclide (I-131, I-133 and particulates) dose assessment as presented above, the following simplified dose calculation equation may be used for verifying compliance with the dose limits of CONTROL 3.11.2.3 (Refer to Appendix D for the derivation and justification of this simplified method):

$$D_{\max o} = 3.17E-08 * W * SP_p * R_{I-131} * \sum_i Q_i \quad (2.12)$$

where:

- $D_{\max o}$  = maximum organ dose (mrem).  
 $R_{I-131}$  = I-131 dose parameter for the thyroid for the identified controlling pathway.  
           = 1.05E+12, infant thyroid dose parameter with the cow-milk pathway controlling (m2 - mrem/yr per  $\mu\text{Ci/sec}$ ).  
 $W$  = D/Q for radioiodine, 2.87E-10 1/m2.  
 $Q_i$  = cumulative release over the period of interest for radionuclide i -- I-131 or radioactive material in particulate form with half-life greater than 8 days ( $\mu\text{Ci}$ ).

The location of exposure pathways and the maximum organ dose calculation may be based on the available pathways in the surrounding environment of Hope Creek as identified by the annual land-use census (CONTROL 3.12.2). Otherwise, the dose will be evaluated based on the predetermined controlling pathways as identified in Table 2-3.

## 2.6 Gaseous Effluent Dose Projection

CONTROL 3.11.2.4 requires that the VENTILATION EXHAUST TREATMENT SYSTEM be used to reduce radioactive material levels prior to discharge when projected doses in 31-days exceed:

- 0.2 mrad to air from gamma radiation, or
- 0.4 mrad to air from beta radiation, or
- 0.3 mrad to any organ of a MEMBER OF THE PUBLIC

The applicable gaseous processing systems for maintaining radioactive material releases ALARA are the Gaseous Radwaste Treatment System and Exhaust Treatment System as delineated in Figures 2-1 and 2-2.

Dose projection are performed at least once per 31-days by the following equations:

$$D_{gp} = (D_g / d) * 31d \quad (2.13)$$

$$D_{dp} = (D_d / d) * 31d \quad (2.14)$$

$$D_{maxp} = (D_{max} / d) * 31d \quad (2.15)$$

where:

- $D_{gp}$  = gamma air dose projection for current 31-day period (mrad).  
 $D_g$  = gamma air dose to date for current calendar quarter as determined by equation (2.7) or (2.9) (mrad).  
 $D_{bp}$  = beta air dose projection for current 31-day period (mrad).  
 $D_b$  = beta air dose to date for current calendar quarter as determined by equation (2.8) or (2.10) (mrad).  
 $D_{maxp}$  = maximum organ dose projection for current 31-day period (mrem).

- $D_{\max}$  = maximum organ dose to date for current calendar quarter as determined by equation (2.11) or (2.12) (mrem).  
 $d$  = number of days in current calendar quarter at the end of the release.  
 $31d$  = the number of days of concern.

### **3.0 SPECIAL DOSE ANALYSIS**

#### **3.1 Doses Due to Activities Inside the SITE BOUNDARY**

In accordance with Technical Specification 6.9.1.7, the Radioactive Effluent Release Report (RERR) submitted by May 1st of each year shall include an assessment of radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY.

The calculation methods as presented in Sections 2.4 and 2.5 may be used for determining the maximum potential dose to a MEMBER OF THE PUBLIC based on the parameters from Table 2-3 and 2-hours per visit per year. The default value for the meteorological dispersion data as presented in Table 2-3 may be used if current year meteorology is unavailable at the time of NRC reporting. However, a follow-up evaluation shall be performed when the data becomes available.

#### **3.2 Total Dose to MEMBERS OF THE PUBLIC - 40 CFR 190**

The Radioactive Effluent Release Report (RERR) submitted by May 1st of each year shall also include an assessment of the radiation dose to the likely most exposed MEMBER OF THE PUBLIC for reactor releases and other nearby uranium fuel cycle courses (including dose contributions from effluents and direct radiation from on-site sources). For the likely most exposed MEMBER OF THE PUBLIC in the vicinity of Artificial Island, the sources of exposure need only consider the Salem Generating station and the Hope Creek Generating Station: No other fuel cycle facilities contribute to the MEMBER OF THE PUBLIC dose for the Artificial Island vicinity.

The dose contribution from the operation of Salem Generating Stations will be estimated based on the methods as presented in the Salem Offsite Dose Calculation Manual (SGS ODCM).

As appropriate for demonstrating/evaluating compliance with the limits of CONTROL 3.11.4 (40 CFR 190), the results of the environmental monitoring program may be used for providing data on actual measured levels of radioactive material in the actual pathways of exposure.

##### **3.2.1 Effluent Dose Calculations**

For purposes of implementing the surveillance requirements of CONTROL 3/4.11.4 and the reporting requirements of 6.9.1.7 (RERR), dose calculations for the Hope Creek Generating Station may be performed using the calculation methods contained within the ODCM; the conservation controlling pathways and locations of Table 2-4 or the actual pathways and locations as identified by the land use census (CONTROL 3/4.12.1) may be used. Average annual meteorological dispersion parameters or meteorological conditions concurrent with the release period under evaluation may be used.

**3.2.2 Direct Exposure Dose Determination**

Any potentially significant direct exposure contribution to off-site individual doses may be evaluated based on the results of the environmental measurements (e.g., TLD, ion chamber measurements) and/or by the use of a radiation transport and shielding calculation method. Only during a non-typical condition will there exist any potential for significant on-site sources at Hope Creek that would yield potentially significant off-site doses (i.e., in excess of 1 mrem per year to a MEMBER OF THE PUBLIC), that would require detailed evaluation for demonstrating compliance with 40 CFR 190. However, should a situation exist whereby the direct exposure contribution is potentially significant, on-site measurements, off-site measurements and/or calculational techniques will be used for determination of dose for assessing 40 CFR 190 compliance.

**4.0 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM****4.1 Sampling Program**

The operational phase of the Radiological Environmental Monitoring Program (REMP) is conducted in accordance with the requirements of CONTROL 3.12. The objectives of the program are:

- To determine whether any significant increases occur in the concentration of radionuclides in the critical pathways of exposure in the vicinity of Artificial Island;
- To determine if the operation of the Hope Creek Generating Station has resulted in any increase in the inventory of long lived radionuclides in the environment;
- To detect any changes in the ambient gamma radiation levels; and
- To verify that HCGS operations have no detrimental effects on the health and safety of the public or on the environment.

The sampling requirements (type of samples, collection frequency and analysis) and sample locations are presented in Appendix E.

**NOTE:** No public drinking water samples or irrigation water samples are taken as these pathways are not directly effected by liquid effluents discharged from Hope Creek Generating Station.

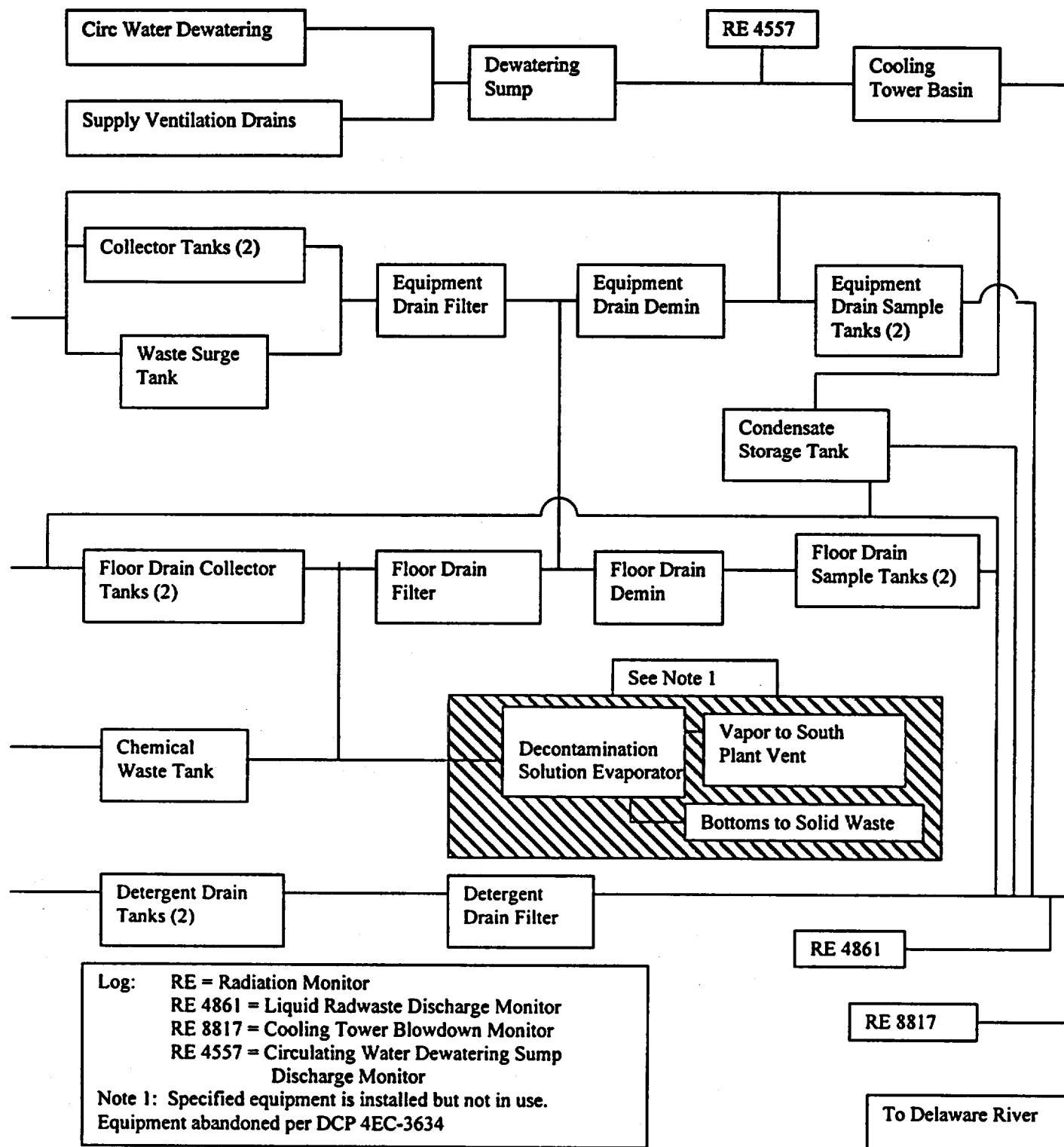
**4.2 Interlaboratory Comparison Program**

CONTROL 3.12.3 requires analyses be performed on radioactive material supplied as part of an Interlaboratory Comparison. Participation in an approved Interlaboratory Comparison Program provides a check on the preciseness of measurements of radioactive materials in environmental samples. A summary of the Interlaboratory Comparison Program results will be provided in the Annual Radiological Environmental Operating Report pursuant to CONTROLS 6.9.1.7.

**5.0 HCGS EXPLOSIVE GAS MONITORING PROGRAM**

The Hope Creek Explosive Gas Monitoring program was moved within the Hope Creek Technical Specifications to section 6.8.4.d. This was performed in Technical Specification Amendment 91. Details of the Hope Creek Explosive Gas Monitoring program are maintained in station implementing procedures and are controlled by the 50.59 safety evaluation and procedure processes.

**FIGURE 1-1: LIQUID RADWASTE TREATMENT AND MONITORING SYSTEM**



**FIGURE 1-2: SOLID RADWASTE PROCESSING SYSTEM**

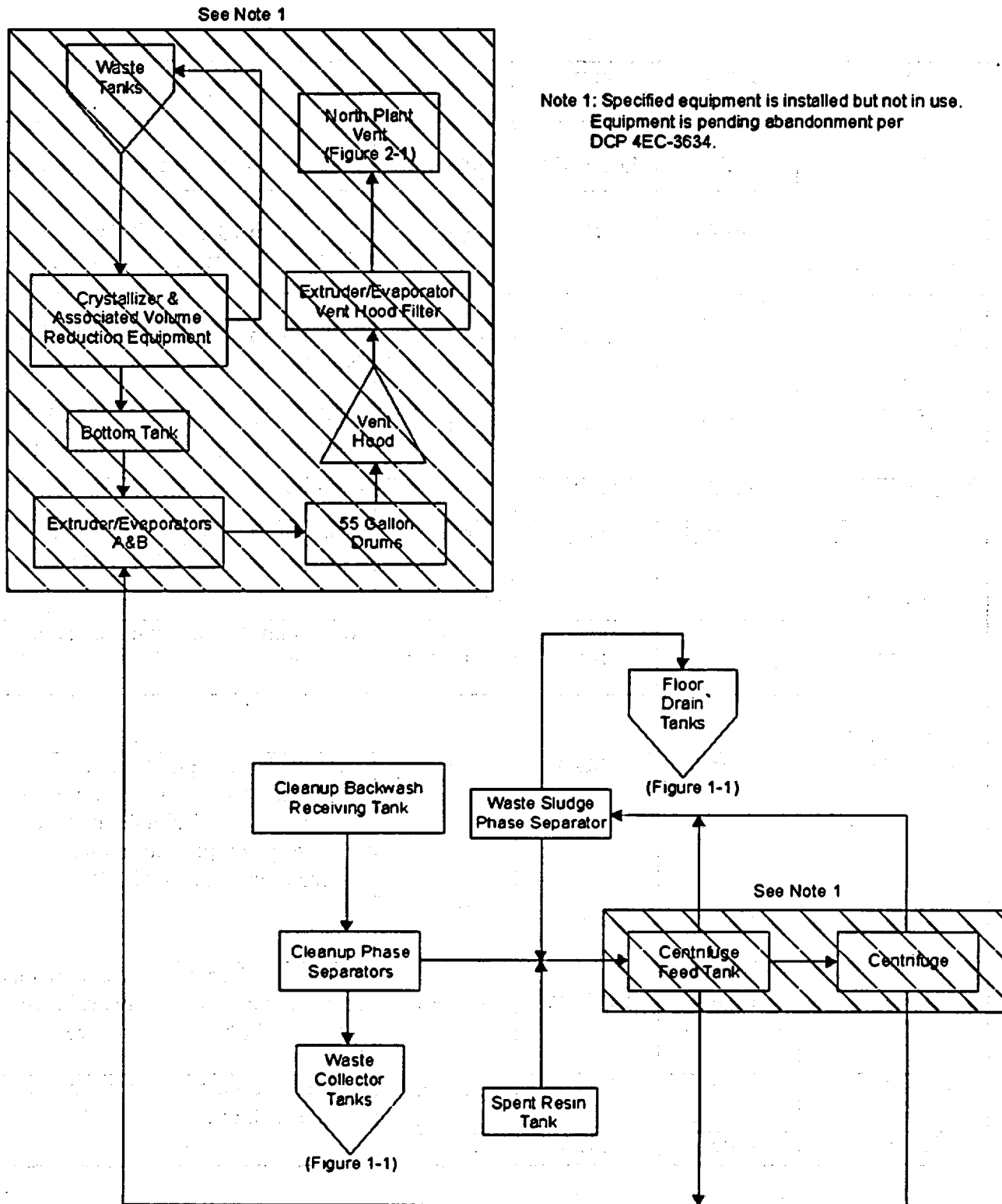


TABLE 1-1: PARAMETERS FOR LIQUID ALARM SETPOINT DETERMINATION

Parameter	Actual Value	Default Value	Units	Comments
MPC <sub>e</sub>	Calc	4.09E-05*	μCi/ml	Calculated for each batch to be released
MPC I-131	3.0E-07	N/A	μCi/ml	Taken from 10 CFR 20, Appendix B, Table II, Column 2 (Appendix F)
C <sub>i</sub>	Measured	N/A	μCi/ml	Taken from gamma spectral analysis of liquid effluent
MPC <sub>i</sub>	Measured	N/A	μCi/ml	Taken from 10CFR20, Appendix B, Table II, Column 2 (Appendix F)
CTBD	Measured	12000	gpm	Cooling tower blowdown discharge
RR	Measured	176 1300	gpm or gpm(CST)	Determined prior to release, release rate can be adjusted for CONTROL compliance
	Estimated	100	gpm (TBCW)	Maximum flow rate with both pumps running (50 gpm each)
SP (Setpoints)				
A) RE4861	Calc	5.58E-04	μCi/ml	Default alarm setpoints; more conservative values may be used as appropriate and desirable for ensuring regulatory compliance and for maintaining releases ALARA
RE8817	Calc	8.18E-06	μCi/ml	
RE4557	Calc	2.40E-06	μCi/ml	Maximum alarm setpoint continuous release; more conservative value may be established by plant procedure
B) RE4861	Calc	7.55E-05	μCi/ml	These setpoints are for condensate storage tank releases
RE8817	Calc	8.18E-06	μCi/ml	

\* See Appendix A for basis

TABLE 1-2: SITE RELATED INGESTION DOSE COMMITMENT FACTOR,  $A_{10}$   
 (FISH AND INVERTEBRATE CONSUMPTION)  
 (mrem/hr per  $\mu\text{Ci/ml}$ )

Nuclide	Bone	Liver	T.Body	Thyroid	Kidney	Lung	GI-LLI
H-3	-	2.82E-1	2.82E-1	2.82E-1	2.82E-1	2.82E-1	2.82E-1
C-14	1.45E+4	2.90E+3	2.90E+3	2.90E+3	2.90E+3	2.90E+3	2.90E+3
Na-24	4.57E-1	4.57E-1	4.57E-1	4.57E-1	4.57E-1	4.57E-1	4.57E-1
P-32	4.69E+6	2.91E+5	1.81E+5	-	-	-	5.27E+5
Cr-51	-	-	5.58E+0	3.34E+0	1.23E+0	7.40E+0	1.40E+3
Mn-54	-	7.06E+3	1.35E+3	-	2.10E+3	-	2.16E+4
Mn-56	-	1.78E+2	3.15E+1	-	2.26E+2	-	5.67E+3
Fe-55	5.11E+4	3.53E+4	8.23E+3	-	-	1.97E+4	2.03E+4
Fe-59	8.06E+4	1.90E+5	7.27E+4	-	-	5.30E+4	6.32E+5
Co-57	-	1.42E+2	2.36E+2	-	-	-	3.59E+3
Co-58	-	6.03E+2	1.35E+3	-	-	-	1.22E+4
Co-60	-	1.73E+3	3.82E+3	-	-	-	3.25E+4
Ni-63	4.96E+4	3.44E+3	1.67E+3	-	-	-	7.18E+2
Ni-65	2.02E+2	2.62E+1	1.20E+1	-	-	-	6.65E+2
Cu-64	-	2.14E+2	1.01E+2	-	5.40E+2	-	1.83E+4
Zn-65	1.61E+5	5.13E+5	2.32E+5	-	3.43E+5	-	3.23E+5
Zn-69m	5.66E+3	1.36E+4	1.24E+3	-	8.22E+3	-	8.29E+5
As-76	4.38E+2	1.16E+3	5.14E+3	3.42E+2	1.39E+3	3.58E+2	4.30E+4
Br-82	-	-	4.07E+0	-	-	-	4.67E+0
Br-83	-	-	7.25E-2	-	-	-	1.04E-1
Br-84	-	-	9.39E-2	-	-	-	7.37E-7
Br-85	-	-	3.86E-3	-	-	-	-
Rb-86	-	6.24E+2	2.91E+2	-	-	-	1.23E+2
Rb-88	-	1.79E+0	9.49E-1	-	-	-	2.47E-11
Rb-89	-	1.19E+0	8.34E-1	-	-	-	6.89E-14
Sr-89	4.99E+3	-	1.43E+2	-	-	-	8.00E+2
Sr-90	1.23E+5	-	3.01E+4	-	-	-	3.55E+3
Sr-91	9.18E+1	-	3.71E+0	-	-	-	4.37E+2
Sr-92	3.48E+1	-	1.51E+0	-	-	-	6.90E+2
Y-90	6.06E+0	-	1.63E-1	-	-	-	6.42E+4
Y-91m	5.73E-2	-	2.22E-3	-	-	-	1.68E-1
Y-91	8.88E+1	-	2.37E+0	-	-	-	4.89E+4
Y-92	5.32E-1	-	1.56E-2	-	-	-	9.32E+3
Y-93	1.69E+0	-	4.66E-2	-	-	-	5.35E+4
Zr-95	1.59E+1	5.11E+0	3.46E+0	-	8.02E+0	-	1.62E+4
Zr-97	8.81E-1	1.78E-1	8.13E-2	-	2.68E-1	-	5.51E+4
Nb-95	4.47E+2	2.49E+2	1.34E+2	-	2.46E+2	-	1.51E+6
Nb-97	3.75E+0	9.49E-1	3.46E-1	-	1.11E+0	-	3.50E+3
Mo-99	-	1.28E+2	2.43E+1	-	2.89E+2	-	2.96E+2
Tc-99m	1.30E-2	3.66E-2	4.66E-1	-	5.56E-1	1.79E-2	2.17E+1
Tc-101	1.33E-2	1.92E-2	1.88E-1	-	3.46E-1	9.81E-3	5.77E-14



TABLE 1-2 (cont'd)  
 SITE RELATED INGESTION DOSE COMMITMENT FACTOR,  $A_{i0}$   
 (FISH AND INVERTEBRATE CONSUMPTION)  
 (mrem/hr per  $\mu\text{Ci/ml}$ )

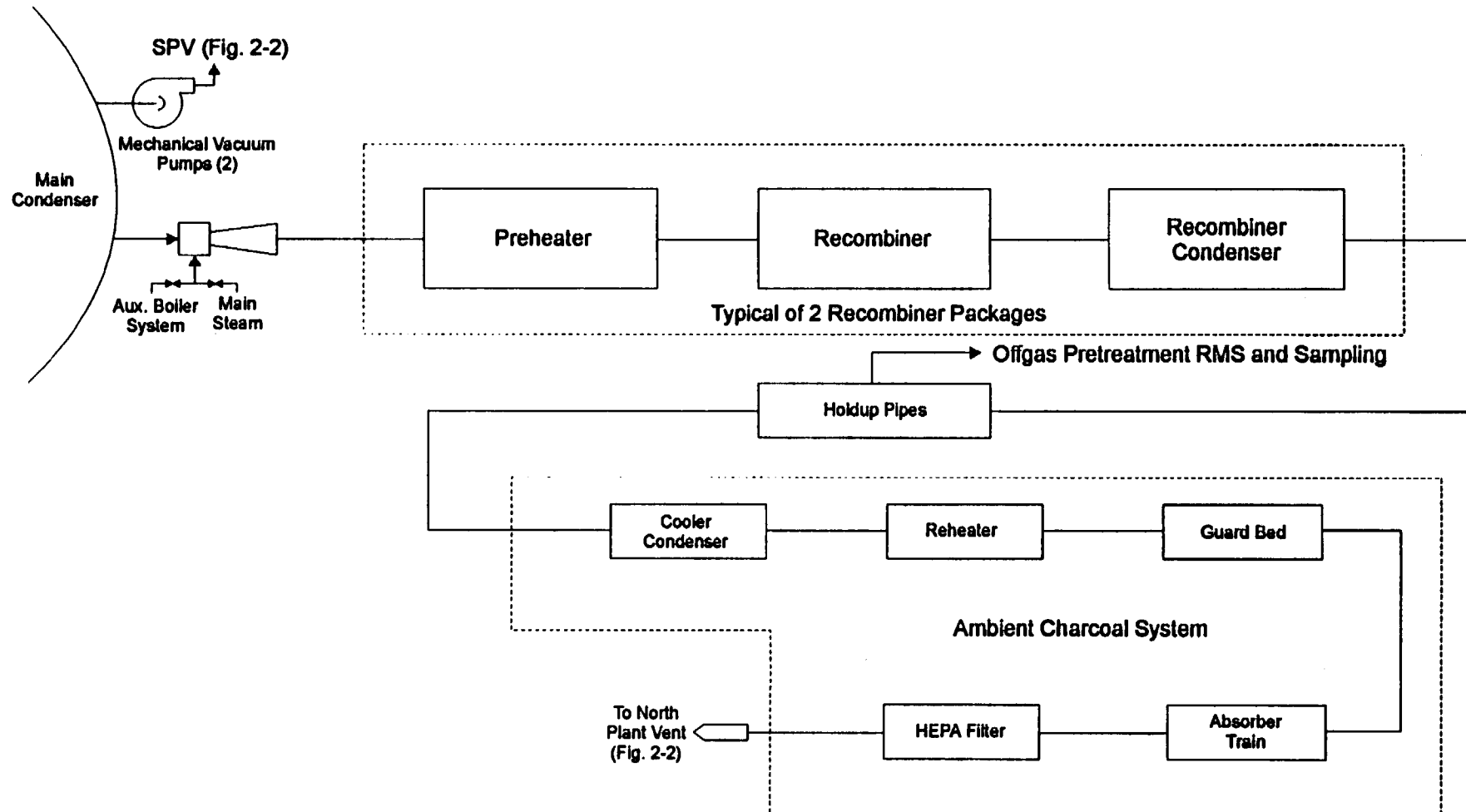
Nuclide	Bone	Liver	T.Body	Thyroid	Kidney	Lung	GI-LLI
Ru-103	1.07E+2	-	4.60E+1	-	4.07E+2	-	1.25E+4
Ru-105	8.89E+0	-	3.51E+0	-	1.15E+2	-	5.44E+3
Ru-106	1.59E+3	-	2.01E+2	-	3.06E+3	-	1.03E+5
Ag-110m	1.56E+3	1.45E+3	8.60E+2	-	2.85E+3	-	5.91E+5
Sb-124	2.77E+2	5.23E+0	1.10E+2	6.71E-1	-	2.15E+2	7.86E+3
Sb-125	1.77E+2	1.98E+0	4.21E+1	1.80E-1	-	1.36E+2	1.95E+3
Te-125m	2.17E+2	7.86E+1	2.91E+1	6.52E+1	8.82E+2	-	8.66E+2
Te-127m	5.48E+2	1.96E+2	6.68E+1	1.40E+2	2.23E+3	-	1.84E+3
Te-127	8.90E+0	3.20E+0	1.93E+0	6.60E+0	3.63E+1	-	7.03E+2
Te-129m	9.31E+2	3.47E+2	1.47E+2	3.20E+2	3.89E+3	-	4.69E+3
Te-129	2.54E+0	9.55E-1	6.19E-1	1.95E+0	1.07E+1	-	1.92E+0
Te-131m	1.40E+2	6.85E+1	5.71E+1	1.08E+2	6.94E+2	-	6.80E+3
Te-131	1.59E+0	6.66E-1	5.03E-1	1.31E+0	6.99E+0	-	2.26E-1
Te-132	2.04E+2	1.32E+2	1.24E+2	1.46E+2	1.27E+3	-	6.24E+3
I-130	3.96E+1	1.17E+2	4.61E+1	9.91E+3	1.82E+2	-	1.01E+2
I-131	2.18E+2	3.12E+2	1.79E+2	1.02E+5	5.35E+2	-	8.23E+1
I-132	1.06E+1	2.85E+1	9.96E+0	9.96E+2	4.54E+1	-	5.35E+0
I-133	7.45E+1	1.30E+2	3.95E+1	1.90E+4	2.26E+2	-	1.16E+2
I-134	5.56E+0	1.51E+1	5.40E+0	2.62E+2	2.40E+1	-	1.32E-2
I-135	2.32E+1	6.08E+1	2.24E+1	4.01E+3	9.75E+1	-	6.87E+1
Cs-134	6.84E+3	1.63E+4	1.33E+4	-	5.27E+3	1.75E+3	2.85E+2
Cs-136	7.16E+2	2.83E+3	2.04E+3	-	1.57E+3	2.16E+2	3.21E+2
Cs-137	8.77E+3	1.20E+4	7.85E+3	-	4.07E+3	1.35E+3	2.32E+2
Cs-138	6.07E+0	1.20E+1	5.94E+0	-	8.81E+0	8.70E-1	5.12E-5
Ba-139	7.85E+0	5.59E-3	2.30E-1	-	5.23E-3	3.17E-3	1.39E+1
Ba-140	1.64E+3	2.06E+0	1.08E+2	-	7.02E-1	1.18E+0	3.38E+3
Ba-141	3.81E+0	2.88E-3	1.29E-1	-	2.68E-3	1.63E-3	1.80E-9
Ba-142	1.72E+0	1.77E-3	1.08E-1	-	1.50E-3	1.00E-3	2.43E-18
La-140	1.57E+0	7.94E-1	2.10E-1	-	-	-	5.83E+4
La-142	8.06E-2	3.67E-2	9.13E-3	-	-	-	2.68E+2
Ce-141	3.43E+0	2.32E+0	2.63E-1	-	1.08E+0	-	8.86E+3
Ce-143	6.04E-1	4.46E+2	4.94E-2	-	1.97E-1	-	1.67E+4
Ce-144	1.79E+2	7.47E+1	9.59E+0	-	4.43E+1	-	6.04E+4
Pr-143	5.79E+0	2.32E+0	2.87E-1	-	1.34E+0	-	2.54E+4
Pr-144	1.90E-2	7.87E-3	9.64E-4	-	4.44E-3	-	2.73E-9
Nd-147	3.96E+0	4.58E+0	2.74E-1	-	2.68E+0	-	2.20E+4
W-187	9.16E+0	7.66E+0	2.68E+0	-	-	-	2.51E+3
Np-239	3.53E-2	3.47E-3	1.91E-3	-	1.08E-2	-	7.11E+2

**TABLE 1-3: BIOACCUMULATION FACTORS**  
(pCi/kg per pCi/liter)\*

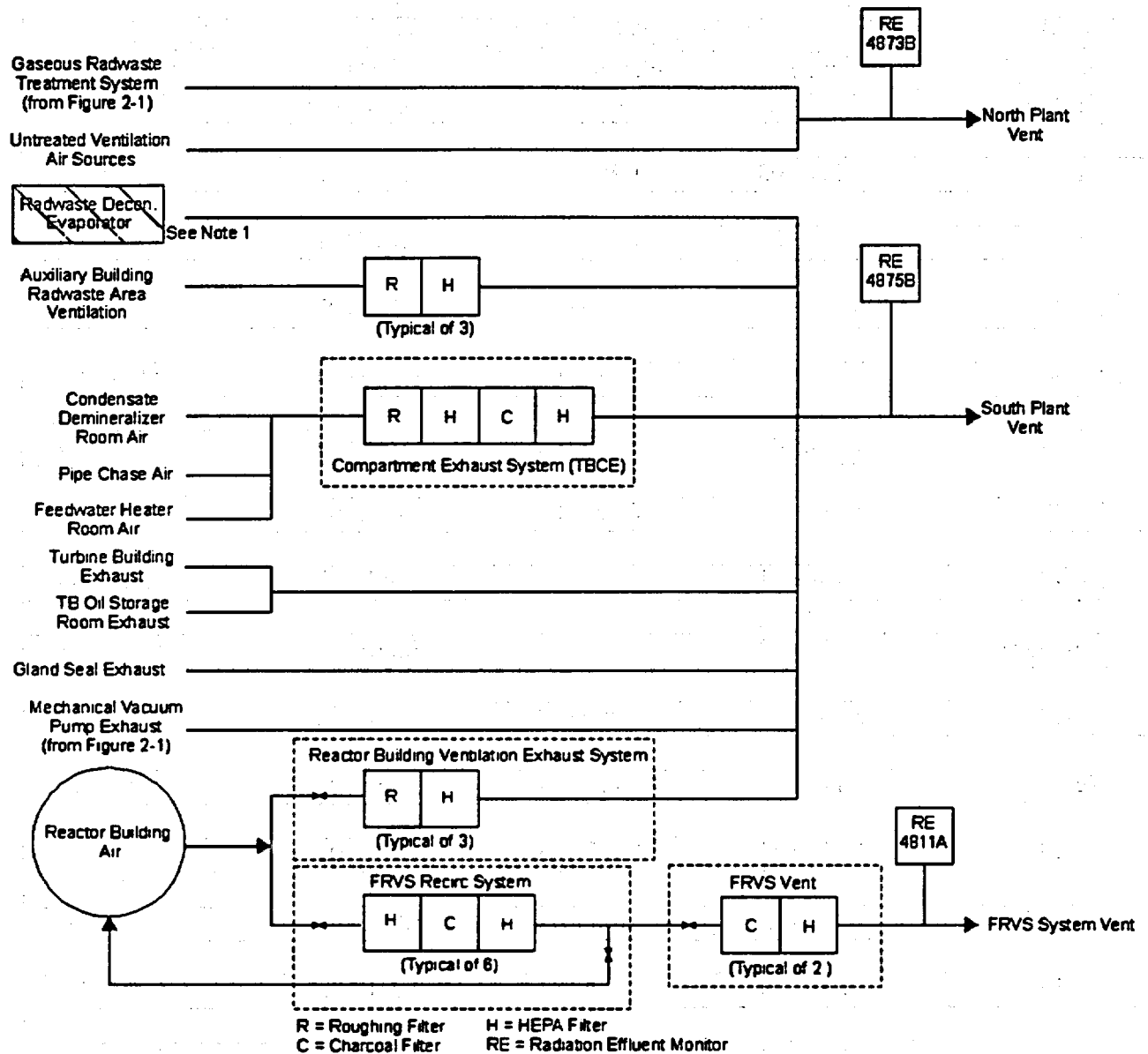
<b>ELEMENT</b>	<b>SALTWATER FISH</b>	<b>SALTWATER INVERTEBRATES</b>
H	9.0E-01	9.3E-01
C	1.8E+03	1.4E+03
Na	6.7E-02	1.9E-01
P	3.0E+03	3.0E+04
Cr	4.0E+02	2.0E+03
Mn	5.5E+02	4.0E+02
Fe	3.0E+03	2.0E+04
Co	1.0E+02	1.0E+03
Ni	1.0E+02	2.5E+02
Cu	6.7E+02	1.7E+03
Zn	2.0E+03	5.0E+04
Br	1.5E-02	3.1E+00
Rb	8.3E+00	1.7E+01
Sr	2.0E+00	2.0E+01
Y	2.5E+01	1.0E+03
Zr	2.0E+02	8.0E+01
Nb	3.0E+04	1.0E+02
Mo	1.0E+01	1.0E+01
Tc	1.0E+01	5.0E+01
Ru	3.0E+00	1.0E+03
Rh	1.0E+01	2.0E+03
Ag	3.3E+03	3.3E+03
Sb	4.0E+01	5.4E+00
Te	1.0E+01	1.0E+02
I	1.0E+01	5.0E+01
Cs	4.0E+01	2.5E+01
Ba	1.0E+01	1.0E+02
La	2.5E+01	1.0E+03
Ce	1.0E+01	6.0E+02
Pr	2.5E+01	1.0E+03
Nd	2.5E+01	1.0E+03
W	3.0E+01	3.0E+01
Np	1.0E+01	1.0E+01
As	3.3E+02	3.3E+02

- \* Values in this table are taken from Regulatory Guide 1.109 except for phosphorus (fish) which is adapted from NUREG/CR-1336 and silver, arsenic and antimony which are taken from UCRL 50564, Rev. 1, October 1972.

**FIGURE 2-1: GASEOUS RADWASTE TREATMENT SYSTEM**



**FIGURE 2-2: VENTILATION EXHAUST TREATMENT SYSTEM**



**Note 1:** Specified equipment is installed but not in use.  
 Equipment pending abandonment per DCP 4EC-3634.

TABLE 2-1: DOSE FACTORS FOR NOBLE GASES

	Total Body Dose Factor Ki	Skin Dose Factor Li	Gamma Air Dose Factor Mi	Beta Air Dose Factor Ni
	(mrem/yr per $\mu\text{Ci/m}^3$ )	(mrem/yr per $\mu\text{Ci/m}^3$ )	(mrad/yr per $\mu\text{Ci/m}^3$ )	(mrad/yr per $\mu\text{Ci/m}^3$ )
<b>Radionuclide</b>				
Kr-83m	7.56E-02	-	1.93E+01	2.88E+02
Kr-85m	1.17E+03	1.46E+03	1.23E+03	1.97E+03
Kr-85	1.61E+01	1.34E+03	1.72E+01	1.95E+03
Kr-87	5.92E+03	9.73E+03	6.17E+03	1.03E+04
Kr-88	1.47E+04	2.37E+03	1.52E+04	2.93E+03
Kr-89	1.66E+04	1.01E+04	1.73E+04	1.06E+04
Kr-90	1.56E+04	7.29E+03	1.63E+04	7.83E+03
Xe-131m	9.15E+01	4.76E+02	1.56E+02	1.11E+03
Xe-133m	2.51E+02	9.94E+02	3.27E+02	1.48E+03
Xe-133	2.94E+02	3.06E+02	3.53E+02	1.05E+03
Xe-135m	3.12E+03	7.11E+02	3.36E+03	7.39E+02
Xe-135	1.81E+03	1.86E+03	1.92E+03	2.46E+03
Xe-137	1.42E+03	1.22E+04	1.51E+03	1.27E+04
Xe-138	8.83E+03	4.13E+03	9.21E+03	4.75E+03
Ar-41	8.84E+03	2.69E+03	9.30E+03	3.28E+03

TABLE 2-2: PARAMETERS FOR GASEOUS ALARM SETPOINT DETERMINATION

<u>Parameter</u>	<u>Actual Value</u>	<u>Default Value</u>	<u>Units</u>	<u>Comments</u>
X/Q	Calculated	2.67E-6	sec/m <sup>3</sup>	From FSAR Table 2.3-31, 0.5 mile, N
VF (NPV)	Measured	41900	ft <sup>3</sup> /min	Maximum Operation
VF (SPV)	Measured	440,180	ft <sup>3</sup> /min	Maximum Operation
VF (FRVS)	Measured	9000	ft <sup>3</sup> /min	Maximum Operation
AF (NPV)	Coordinated with SGS	0.2	Unitless	Administrative allocation factor to ensure releases do not exceed release rate limit
AF (SPV)		0.2	Unitless	
AF (FRVS)		0.1	Unitless	
C <sub>i</sub>	Measured	N/A	μCi/cm <sup>3</sup>	
K <sub>i</sub>	Nuclide Specific	N/A	mrem/yr per μCi/m <sup>3</sup>	Table 2-1
L <sub>i</sub>	Nuclide Specific	N/A	mrem/yr per μCi/m <sup>3</sup> )	Table 2-1
M <sub>i</sub>	Nuclide Specific	N/A	mrads/yr per μCi/m <sup>3</sup>	Table 2-1
SP:	NPV	Calculated	2.43E-4	Default alarm Setpoints; more conservative values may be used as deemed appropriate for ensuring ALARA & regulatory compliance
	SPV	Calculated	2.31E-5	
	FRVS	Calculated	5.65E-4	

**TABLE 2-3: CONTROLLING LOCATIONS, PATHWAYS AND ATMOSPHERIC DISPERSION FOR DOSE CALCULATIONS\***

<u>ODCM CONTROL</u>	<u>Location</u>	<u>Pathway(s)</u>	<u>Age Group</u>	<u>(sec/m3)</u>	<u>(1/m2)</u>
3.11.2.1a	Site Boundary 0.5 Mile, N	Noble Gases direct exposure	N/A	2.67E-06	N/A
3.11.2.1b	Site Boundary 0.5 Mile, N	Inhalation	Child	2.67E-06	N/A
3.11.2.2	Site Boundary 0.5 Mile, N	Gamma-Air Beta-Air	N/A	2.67E-06	N/A
3.11.2.3	Residence/ Dairy - 4.9 Miles, W	Milk, ground plane and inhalation	Infant	7.2E-08	2.87E-10

\* The identified controlling locations, pathways and atmospheric dispersion are from the Artificial Island Radiological Monitoring Program and the Hope Creek FSAR.

**Table 2-4: Pathway Dose Factors - Atmospheric Releases, R(io)**  
**Inhalation Pathway Dose Factors - ADULT**  
**(mrem/yr per  $\mu\text{Ci}/\text{m}^3$ )**

<u>Nuclide</u>	<u>Bone</u>	<u>Liver</u>	<u>Thyroid</u>	<u>Kidney</u>	<u>Lung</u>	<u>GI-LLI</u>	<u>T.Body</u>
H-3	-	1.26E+3	1.26E+3	1.26E+3	1.26E+3	1.26E+3	1.26E+3
C-14	1.82E+4	3.41E+3	3.41E+3	3.41E+3	3.41E+3	3.41E+3	3.41E+3
P-32	1.32E+6	7.71E+4	-	-	-	8.64E+4	5.01E+4
Cr-51	-	-	5.95E+1	2.28E+1	1.44E+4	3.32E+3	1.00E+2
Mn-54	-	3.96E+4	-	9.84E+3	1.40E+6	7.74E+4	6.30E+3
Fe-55	2.46E+4	1.70E+4	-	-	7.21E+4	6.03E+3	3.94E+3
Fe-59	1.18E+4	2.78E+4	-	-	1.02E+6	1.88E+5	1.06E+4
Co-57	-	6.92E+2	-	-	3.70E+5	3.14E+4	6.71E+2
Co-58	-	1.58E+3	-	-	9.28E+5	1.06E+5	2.07E+3
Co-60	-	1.15E+4	-	-	5.97E+6	2.85E+5	1.48E+4
Ni-63	4.32E+5	3.14E+4	-	-	1.78E+5	1.34E+4	1.45E+4
Zn-65	3.24E+4	1.03E+5	-	6.90E+4	8.64E+5	5.34E+4	4.66E+4
Rb-86	-	1.35E+5	-	-	-	1.66E+4	5.90E+4
Sr-89	3.04E+5	-	-	-	1.40E+6	3.50E+5	8.72E+3
Sr-90	9.92E+7	-	-	-	9.60E+6	7.22E+5	6.10E+6
Y-91	4.62E+5	-	-	-	1.70E+6	3.85E+5	1.24E+4
Zr-95	1.07E+5	3.44E+4	-	5.42E+4	1.77E+6	1.50E+5	2.33E+4
Nb-95	1.41E+4	7.82E+3	-	7.74E+3	5.05E+5	1.04E+5	4.21E+3
Ru-103	1.53E+3	-	-	5.83E+3	5.05E+5	1.10E+5	6.58E+2
Ru-106	6.91E+4	-	-	1.34E+5	9.36E+6	9.12E+5	8.72E+3
Ag-110m	1.08E+4	1.00E+4	-	1.97E+4	4.63E+6	3.02E+5	5.94E+3
Sb-124	3.12E+4	5.89E+2	7.55E+1	-	2.48E+6	4.06E+5	1.24E+4
Sb-125	5.34E+4	5.95E+2	5.40E+1	-	1.74E+6	1.01E+5	1.26E+4
Te-125m	3.42E+3	1.58E+3	1.05E+3	1.24E+4	3.14E+5	7.06E+4	4.67E+2
Te-127m	1.26E+4	5.77E+3	3.29E+3	4.58E+4	9.60E+5	1.50E+5	1.57E+3
Te-129m	9.76E+3	4.67E+3	3.44E+3	3.66E+4	1.16E+6	3.83E+5	1.58E+3
I-131	2.52E+4	3.58E+4	1.19E+7	6.13E+4	-	6.28E+3	2.05E+4
I-132	1.16E+3	3.26E+3	1.14E+5	5.18E+3	-	4.06E+2	1.16E+3
I-133	8.64E+3	1.48E+4	2.15E+6	2.58E+4	-	8.88E+3	4.52E+3
I-134	6.44E+2	1.73E+3	2.98E+4	2.75E+3	-	1.01E+0	6.15E+2
I-135	2.68E+3	6.98E+3	4.48E+5	1.11E+4	-	5.25E+3	2.57E+3
Cs-134	3.73E+5	8.48E+5	-	2.87E+5	9.76E+4	1.04E+4	7.28E+5
Cs-136	3.90E+4	1.46E+5	-	8.56E+4	1.20E+4	1.17E+4	1.10E+5
Cs-137	4.78E+5	6.21E+5	-	2.22E+5	7.52E+4	8.40E+3	4.28E+5
Ba-140	3.90E+4	4.90E+1	-	1.67E+1	1.27E+6	2.18E+5	2.57E+3
Ce-141	1.99E+4	1.35E+4	-	6.26E+3	3.62E+5	1.20E+5	1.53E+3
Ce-144	3.43E+6	1.43E+6	-	8.48E+5	7.78E+6	8.16E+5	1.84E+5
Pr-143	9.36E+3	3.75E+3	-	2.16E+3	2.81E+5	2.00E+5	4.64E+2
Nd-147	5.27E+3	6.10E+3	-	3.56E+3	2.21E+5	1.73E+5	3.65E+2



Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Inhalation Pathway Dose Factors - TEENAGER  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ )

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	1.27E+3	1.27E+3	1.27E+3	1.27E+3	1.27E+3	1.27E+3
C-14	2.60E+4	4.87E+3	4.87E+3	4.87E+3	4.87E+3	4.87E+3	4.87E+3
P-32	1.89E+6	1.10E+5	-	-	-	9.28E+4	7.16E+4
Cr-51	-	-	7.50E+1	3.07E+1	2.10E+4	3.00E+3	1.35E+2
Mn-54	-	5.11E+4	-	1.27E+4	1.98E+6	6.68E+4	8.40E+3
Fe-55	3.34E+4	2.38E+4	-	-	1.24E+5	6.39E+3	5.54E+3
Fe-59	1.59E+4	3.70E+4	-	-	1.53E+6	1.78E+5	1.43E+4
Co-57	-	6.92E+2	-	-	5.86E+5	3.14E+4	9.20E+2
Co-58	-	2.07E+3	-	-	1.34E+6	9.52E+4	2.78E+3
Co-60	-	1.51E+4	-	-	8.72E+6	2.59E+5	1.98E+4
Ni-63	5.80E+5	4.34E+4	-	-	3.07E+5	1.42E+4	1.98E+4
Zn-65	3.86E+4	1.34E+5	-	8.64E+4	1.24E+6	4.66E+4	6.24E+4
Rb-86	-	1.90E+5	-	-	-	1.77E+4	8.40E+4
Sr-89	4.34E+5	-	-	-	2.42E+6	3.71E+5	1.25E+4
Sr-90	1.08E+8	-	-	-	1.65E+7	7.65E+5	6.68E+6
Y-91	6.61E+5	-	-	-	2.94E+6	4.09E+5	1.77E+4
Zr-95	1.46E+5	4.58E+4	-	6.74E+4	2.69E+6	1.49E+5	3.15E+4
Nb-95	1.86E+4	1.03E+4	-	1.00E+4	7.51E+5	9.68E+4	5.66E+3
Ru-103	2.10E+3	-	-	7.43E+3	7.83E+5	1.09E+5	8.96E+2
Ru-106	9.84E+4	-	-	1.90E+5	1.61E+7	9.60E+5	1.24E+4
Ag-110m	1.38E+4	1.31E+4	-	2.50E+4	6.75E+6	2.73E+5	7.99E+3
Sb-124	4.30E+4	7.94E+2	9.76E+1	-	3.85E+6	3.98E+5	1.68E+4
Sb-125	7.38E+4	8.08E+2	7.04E+1	-	2.74E+6	9.92E+4	1.72E+4
Te-125m	4.88E+3	2.24E+3	1.40E+3	-	5.36E+5	7.50E+4	6.67E+2
Te-127m	1.80E+4	8.16E+3	4.38E+3	6.54E+4	1.66E+6	1.59E+5	2.18E+3
Te-129m	1.39E+4	6.58E+3	4.58E+3	5.19E+4	1.98E+6	4.05E+5	2.25E+3
I-131	3.54E+4	4.91E+4	1.46E+7	8.40E+4	-	6.49E+3	2.64E+4
I-132	1.59E+3	4.38E+3	1.51E+5	6.92E+3	-	1.27E+3	1.58E+3
I-133	1.22E+4	2.05E+4	2.92E+6	3.59E+4	-	1.03E+4	6.22E+3
I-134	8.88E+2	2.32E+3	3.95E+4	3.66E+3	-	2.04E+1	8.40E+2
I-135	3.70E+3	9.44E+3	6.21E+5	1.49E+4	-	6.95E+3	3.49E+3
Cs-134	5.02E+5	1.13E+6	-	3.75E+5	1.46E+5	9.76E+3	5.49E+5
Cs-136	5.15E+4	1.94E+5	-	1.10E+5	1.78E+4	1.09E+4	1.37E+5
Cs-137	6.70E+5	8.48E+5	-	3.04E+5	1.21E+5	8.48E+3	3.11E+5
Ba-140	5.47E+4	6.70E+1	-	2.28E+1	2.03E+6	2.29E+5	3.52E+3
Ce-141	2.84E+4	1.90E+4	-	8.88E+3	6.14E+5	1.26E+5	2.17E+3
Ce-144	4.89E+6	2.02E+6	-	1.21E+6	1.34E+7	8.64E+5	2.62E+5
Pr-143	1.34E+4	5.31E+3	-	3.09E+3	4.83E+5	2.14E+5	6.62E+2
Nd-147	7.86E+3	8.56E+3	-	5.02E+3	3.72E+5	1.82E+5	5.13E+2

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Inhalation Pathway Dose Factors - CHILD  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ )

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	1.12E+3	1.12E+3	1.12E+3	1.12E+3	1.12E+3	1.12E+3
C-14	3.59E+4	6.73E+3	6.73E+3	6.73E+3	6.73E+3	6.73E+3	6.73E+3
P-32	2.60E+6	1.14E+5	-	-	-	4.22E+4	9.88E+4
Cr-51	-	-	8.55E+1	2.43E+1	1.70E+4	1.08E+3	1.54E+2
Mn-54	-	4.29E+4	-	1.00E+4	1.58E+6	2.29E+4	9.51E+3
Fe-55	4.74E+4	2.52E+4	-	-	1.11E+5	2.87E+3	7.77E+3
Fe-59	2.07E+4	3.34E+4	-	-	1.27E+6	7.07E+4	1.67E+4
Co-57	-	9.03E+2	-	-	5.07E+5	1.32E+4	1.07E+3
Co-58	-	1.77E+3	-	-	1.11E+6	3.44E+4	3.16E+3
Co-60	-	1.31E+4	-	-	7.07E+6	9.62E+4	2.26E+4
Ni-63	8.21E+5	4.63E+4	-	-	2.75E+5	6.33E+3	2.80E+4
Zn-65	4.26E+4	1.13E+5	-	7.14E+4	9.95E+5	1.63E+4	7.03E+4
Rb-86	-	1.98E+5	-	-	-	7.99E+3	1.14E+5
Sr-89	5.99E+5	-	-	-	2.16E+6	1.67E+5	1.72E+4
Sr-90	1.01E+8	-	-	-	1.48E+7	3.43E+5	6.44E+6
Y-91	9.14E+5	-	-	-	2.63E+6	1.84E+5	2.44E+4
Zr-95	1.90E+5	4.18E+4	-	5.96E+4	2.23E+6	6.11E+4	3.70E+4
Nb-95	2.35E+4	9.18E+3	-	8.62E+3	6.14E+5	3.70E+4	6.55E+3
Ru-103	2.79E+3	-	-	7.03E+3	6.62E+5	4.48E+4	1.07E+3
Ru-106	1.36E+5	-	-	1.84E+5	1.43E+7	4.29E+5	1.69E+4
Ag-110m	1.69E+4	1.14E+4	-	2.12E+4	5.48E+6	1.00E+5	9.14E+3
Sb-124	5.74E+4	7.40E+2	1.26E+2	-	3.24E+6	1.64E+5	2.00E+4
Sb-125	9.84E+4	7.59E+2	9.10E+1	-	2.32E+6	4.03E+4	2.07E+4
Te-125m	6.73E+3	2.33E+3	1.92E+3	-	4.77E+5	3.38E+4	9.14E+2
Te-127m	2.49E+4	8.55E+3	6.07E+3	6.36E+4	1.48E+6	7.14E+4	3.02E+3
Te-129m	1.92E+4	6.85E+3	6.33E+3	5.03E+4	1.76E+6	1.82E+5	3.04E+3
I-131	4.81E+4	4.81E+4	1.62E+7	7.88E+4	-	2.84E+3	2.73E+4
I-132	2.12E+3	4.07E+3	1.94E+5	6.25E+3	-	3.22E+3	1.88E+3
I-133	1.66E+4	2.03E+4	3.85E+6	3.38E+4	-	5.48E+3	7.70E+3
I-134	1.17E+3	2.16E+3	5.07E+4	3.30E+3	-	9.55E+2	9.95E+2
I-135	4.92E+3	8.73E+3	7.92E+5	1.34E+4	-	4.44E+3	4.14E+3
Cs-134	6.51E+5	1.01E+6	-	3.30E+5	1.21E+5	3.85E+3	2.25E+5
Cs-136	6.51E+4	1.71E+5	-	9.55E+4	1.45E+4	4.18E+3	1.16E+5
Cs-137	9.07E+5	8.25E+5	-	2.82E+5	1.04E+5	3.62E+3	1.28E+5
Ba-140	7.40E+4	6.48E+1	-	2.11E+1	1.74E+6	1.02E+5	4.33E+3
Ce-141	3.92E+4	1.95E+4	-	8.55E+3	5.44E+5	5.66E+4	2.90E+3
Ce-144	6.77E+6	2.12E+6	-	1.17E+6	1.20E+7	3.89E+5	3.61E+5
Pr-143	1.85E+4	5.55E+3	-	3.00E+3	4.33E+5	9.73E+4	9.14E+2
Nd-147	1.08E+4	8.73E+3	-	4.81E+3	3.28E+5	8.21E+4	6.81E+2

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Inhalation Pathway Dose Factors - INFANT  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ )

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	6.47E+2	6.47E+2	6.47E+2	6.47E+2	6.47E+2	6.47E+2
C-14	2.65E+4	5.31E+3	5.31E+3	5.31E+3	5.31E+3	5.31E+3	5.31E+3
P-32	2.03E+6	1.12E+5	-	-	-	1.61E+4	7.74E+4
Cr-51	-	-	5.75E+1	1.32E+1	1.28E+4	3.57E+2	8.95E+1
Mn-54	-	2.53E+4	-	4.98E+3	1.00E+6	7.06E+3	4.98E+3
Fe-55	1.97E+4	1.17E+4	-	-	8.69E+4	1.09E+3	3.33E+3
Fe-59	1.36E+4	2.35E+4	-	-	1.02E+6	2.48E+4	9.48E+3
Co-57	-	6.51E+2	-	-	3.79E+5	4.86E+3	6.41E+2
Co-58	-	1.22E+3	-	-	7.77E+5	1.11E+4	1.82E+3
Co-60	-	8.02E+3	-	-	4.51E+6	3.19E+4	1.18E+4
Ni-63	3.39E+5	2.04E+4	-	-	2.09E+5	2.42E+3	1.16E+4
Zn-65	1.93E+4	6.26E+4	-	3.25E+4	6.47E+5	5.14E+4	3.11E+4
Rb-86	-	1.90E+5	-	-	-	3.04E+3	8.82E+4
Sr-89	3.98E+5	-	-	-	2.03E+6	6.40E+4	1.14E+4
Sr-90	4.09E+7	-	-	-	1.12E+7	1.31E+5	2.59E+6
Y-91	5.88E+5	-	-	-	2.45E+6	7.03E+4	1.57E+4
Zr-95	1.15E+5	2.79E+4	-	3.11E+4	1.75E+6	2.17E+4	2.03E+4
Nb-95	1.57E+4	6.43E+3	-	4.72E+3	4.79E+5	1.27E+4	3.78E+3
Ru-103	2.02E+3	-	-	4.24E+3	5.52E+5	1.61E+4	6.79E+2
Ru-106	8.68E+4	-	-	1.07E+5	1.16E+7	1.64E+5	1.09E+4
Ag-110m	9.98E+3	7.22E+3	-	1.09E+4	3.67E+6	3.30E+4	5.00E+3
Sb-124	3.79E+4	5.56E+2	1.01E+2	-	2.65E+6	5.91E+4	1.20E+4
Sb-125	5.17E+4	4.77E+2	6.23E+1	-	1.64E+6	1.47E+4	1.09E+4
Te-125m	4.76E+3	1.99E+3	1.62E+3	-	4.47E+5	1.29E+4	6.58E+2
Te-127m	1.67E+4	6.90E+3	4.87E+3	3.75E+4	1.31E+6	2.73E+4	2.07E+3
Te-129m	1.41E+4	6.09E+3	5.47E+3	3.18E+4	1.68E+6	6.90E+4	2.23E+3
I-131	3.79E+4	4.44E+4	1.48E+7	5.18E+4	-	1.06E+3	1.96E+4
I-132	1.69E+3	3.54E+3	1.69E+5	3.95E+5	-	1.90E+3	1.26E+3
I-133	1.32E+4	1.92E+4	3.56E+6	2.24E+4	-	2.61E+3	5.60E+3
I-134	9.21E+2	1.88E+3	4.45E+4	2.09E+3	-	1.29E+3	6.65E+2
I-135	3.86E+3	7.60E+3	6.96E+5	8.47E+3	-	1.83E+3	2.77E+3
Cs-134	3.96E+5	7.03E+5	-	1.90E+5	7.97E+4	1.33E+3	7.45E+4
Cs-136	4.83E+4	1.35E+5	-	5.64E+4	1.18E+4	1.43E+3	5.29E+4
Cs-137	5.49E+5	6.12E+5	-	1.72E+5	7.13E+4	1.33E+3	4.55E+4
Ba-140	5.60E+4	5.60E+1	-	1.34E+1	1.60E+6	3.84E+4	2.90E+3
Ce-141	2.77E+4	1.67E+4	-	5.25E+3	5.17E+5	2.16E+4	1.99E+3
Ce-144	3.19E+6	1.21E+6	-	5.38E+5	9.84E+6	1.48E+5	1.76E+5
Pr-143	1.40E+4	5.24E+3	-	1.97E+3	4.33E+5	3.72E+4	6.99E+2
Nd-147	7.94E+3	8.13E+3	-	3.15E+3	3.22E+5	3.12E+4	5.00E+2

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Grass-Cow-Milk Pathway Dose Factors - ADULT  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ) for H-3 and C-14  
 ( $\text{m}^2 \cdot \text{mrem}/\text{yr}$  per  $\mu\text{Ci}/\text{sec}$ ) for others

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	7.63E+2	7.63E+2	7.63E+2	7.63E+2	7.63E+2	7.63E+2
C-14	3.63E+5	7.26E+4	7.26E+4	7.26E+4	7.26E+4	7.26E+4	7.26E+4
P-32	1.71E+10	1.06E+9	-	-	-	1.92E+9	6.60E+8
Cr-51	-	-	1.71E+4	6.30E+3	3.80E+4	7.20E+6	2.86E+4
Mn-54	-	8.40E+6	-	2.50E+6	-	2.57E+7	1.60E+6
Fe-55	2.51E+7	1.73E+7	-	-	9.67E+6	9.95E+6	4.04E+6
Fe-59	2.98E+7	7.00E+7	-	-	1.95E+7	2.33E+8	2.68E+7
Co-57	-	1.28E+6	-	-	-	3.25E+7	2.13E+6
Co-58	-	4.72E+6	-	-	-	9.57E+7	1.06E+7
Co-60	-	1.64E+7	-	-	-	3.08E+8	3.62E+7
Ni-63	6.73E+9	4.66E+8	-	-	-	9.73E+7	2.26E+8
Zn-65	1.37E+9	4.36E+9	-	2.92E+9	-	2.75E+9	1.97E+9
Rb-86	-	2.59E+9	-	-	-	5.11E+8	1.21E+9
Sr-89	1.45E+9	-	-	-	-	2.33E+8	4.16E+7
Sr-90	4.68E+10	-	-	-	-	1.35E+9	1.15E+10
Y-91	8.60E+3	-	-	-	-	4.73E+6	2.30E+2
Zr-95	9.46E+2	3.03E+2	-	4.76E+2	-	9.62E+5	2.05E+2
Nb-95	8.25E+4	4.59E+4	-	4.54E+4	-	2.79E+8	2.47E+4
Ru-103	1.02E+3	-	-	3.89E+3	-	1.19E+5	4.39E+2
Ru-106	2.04E+4	-	-	3.94E+4	-	1.32E+6	2.58E+3
Ag-110m	5.83E+7	5.39E+7	-	1.06E+8	-	2.20E+10	3.20E+7
Sb-124	2.57E+7	4.86E+5	6.24E+4	-	2.00E+7	7.31E+8	1.02E+7
Sb-125	2.04E+7	2.28E+5	2.08E+4	-	1.58E+7	2.25E+8	4.86E+6
Te-125m	1.63E+7	5.90E+6	4.90E+6	6.63E+7	-	6.50E+7	2.18E+6
Te-127m	4.58E+7	1.64E+7	1.17E+7	1.86E+8	-	1.54E+8	5.58E+6
Te-129m	6.04E+7	2.25E+7	2.08E+7	2.52E+8	-	3.04E+8	9.57E+6
I-131	2.96E+8	4.24E+8	1.39E+11	7.27E+8	-	1.12E+8	2.43E+8
I-132	1.64E-1	4.37E-1	1.53E+1	6.97E-1	-	8.22E-2	1.53E-1
I-133	3.97E+6	6.90E+6	1.01E+9	1.20E+7	-	6.20E+6	2.10E+6
I-134	-	-	-	-	-	-	-
I-135	1.39E+4	3.63E+4	2.40E+6	5.83E+4	-	4.10E+4	1.34E+4
Cs-134	5.65E+9	1.34E+10	-	4.35E+9	1.44E+9	2.35E+8	1.10E+10
Cs-136	2.61E+8	1.03E+9	-	5.74E+8	7.87E+7	1.17E+8	7.42E+8
Cs-137	7.38E+9	1.01E+10	-	3.43E+9	1.14E+9	1.95E+8	6.61E+9
Ba-140	2.69E+7	3.38E+4	-	1.15E+4	1.93E+4	5.54E+7	1.76E+6
Ce-141	4.84E+3	3.27E+3	-	1.52E+3	-	1.25E+7	3.71E+2
Ce-144	3.58E+5	1.50E+5	-	8.87E+4	-	1.21E+8	1.92E+4
Pr-143	1.59E+2	6.37E+1	-	3.68E+1	-	6.96E+5	7.88E+0
Nd-147	9.42E+1	1.09E+2	-	6.37E+1	-	5.23E+5	6.52E+0

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Grass-Cow-Milk Pathway Dose Factors - TEENAGER  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ) for H-3 and C-14  
 ( $\text{m}^2 \cdot \text{mrem}/\text{yr}$  per  $\mu\text{Ci}/\text{sec}$ ) for others

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	9.94E+2	9.94E+2	9.94E+2	9.94E+2	9.94E+2	9.94E+2
C-14	6.70E+5	1.34E+5	1.34E+5	1.34E+5	1.34E+5	1.34E+5	1.34E+5
P-32	3.15E+10	1.95E+9	-	-	-	2.65E+9	1.22E+9
Cr-51	-	-	2.78E+4	1.10E+4	7.13E+4	8.40E+6	5.00E+4
Mn-54	-	1.40E+7	-	4.17E+6	-	2.87E+7	2.78E+6
Fe-55	4.45E+7	3.16E+7	-	-	2.00E+7	1.37E+7	7.36E+6
Fe-59	5.20E+7	1.21E+8	-	-	3.82E+7	2.87E+8	4.68E+7
Co-57	-	2.25E+6	-	-	-	4.19E+7	3.76E+6
Co-58	-	7.95E+6	-	-	-	1.10E+8	1.83E+7
Co-60	-	2.78E+7	-	-	-	3.62E+8	6.26E+7
Ni-63	1.18E+10	8.35E+8	-	-	-	1.33E+8	4.01E+8
Zn-65	2.11E+9	7.31E+9	-	4.68E+9	-	3.10E+9	3.41E+9
Rb-86	-	4.73E+9	-	-	-	7.00E+8	2.22E+9
Sr-89	2.67E+9	-	-	-	-	3.18E+8	7.66E+7
Sr-90	9.92E+7	-	-	-	9.60E+6	7.22E+5	6.10E+6
Y-91	1.58E+4	-	-	-	-	6.48E+6	4.24E+2
Zr-95	1.65E+3	5.22E+2	-	7.67E+2	-	1.20E+6	3.59E+2
Nb-95	1.41E+5	7.80E+4	-	7.57E+4	-	3.34E+8	4.30E+4
Ru-103	1.81E+3	-	-	6.40E+3	-	1.52E+5	7.75E+2
Ru-106	3.75E+4	-	-	7.23E+4	-	1.80E+6	4.73E+3
Ag-110m	9.63E+7	9.11E+7	-	1.74E+8	-	2.56E+10	5.54E+7
Sb-124	4.59E+7	8.46E+5	1.04E+5	-	4.01E+7	9.25E+8	1.79E+7
Sb-125	3.65E+7	3.99E+5	3.49E+4	-	3.21E+7	2.84E+8	8.54E+6
Te-125m	3.00E+7	1.08E+7	8.39E+6	-	-	8.86E+7	4.02E+6
Te-127m	8.44E+7	2.99E+7	2.01E+7	3.42E+8	-	2.10E+8	1.00E+7
Te-129m	1.11E+8	4.10E+7	3.57E+7	4.62E+8	-	4.15E+8	1.75E+7
I-131	5.38E+8	7.53E+8	2.20E+11	1.30E+9	-	1.49E+8	4.04E+8
I-132	2.90E-1	7.59E-1	2.56E+1	1.20E+0	-	3.31E-1	2.72E-1
I-133	7.24E+6	1.23E+7	1.72E+9	2.15E+7	-	9.30E+6	3.75E+6
I-134	-	-	-	-	-	-	-
I-135	2.47E+4	6.35E+4	4.08E+6	1.00E+5	-	7.03E+4	2.35E+4
Cs-134	9.81E+9	2.31E+10	-	7.34E+9	2.80E+9	2.87E+8	1.07E+10
Cs-136	4.45E+8	1.75E+9	-	9.53E+8	1.50E+8	1.41E+8	1.18E+9
Cs-137	1.34E+10	1.78E+10	-	6.06E+9	2.35E+9	2.53E+8	6.20E+9
Ba-140	4.85E+7	5.95E+4	-	2.02E+4	4.00E+4	7.49E+7	3.13E+6
Ce-141	8.87E+3	1.35E+4	-	2.79E+3	-	1.69E+7	6.81E+2
Ce-144	6.58E+5	2.72E+5	-	1.63E+5	-	1.66E+8	3.54E+4
Pr-143	2.92E+2	1.17E+2	-	6.77E+1	-	9.61E+5	1.45E+1
Nd-147	1.81E+2	1.97E+2	-	1.16E+2	-	7.11E+5	1.18E+1

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Grass-Cow-Milk Pathway Dose Factors - CHILD  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ) for H-3 and C-14  
 ( $\text{m}^2 \cdot \text{mrem}/\text{yr}$  per  $\mu\text{Ci}/\text{sec}$ ) for others

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	1.57E+3	1.57E+3	1.57E+3	1.57E+3	1.57E+3	1.57E+3
C-14	1.65E+6	3.29E+5	3.29E+5	3.29E+5	3.29E+5	3.29E+5	3.29E+5
P-32	7.77E+10	3.64E+9	-	-	-	2.15E+9	3.00E+9
Cr-51	-	-	5.66E+4	1.55E+4	1.03E+5	5.41E+6	1.02E+5
Mn-54	-	2.09E+7	-	5.87E+6	-	1.76E+7	5.58E+6
Fe-55	1.12E+8	5.93E+7	-	-	3.35E+7	1.10E+7	1.84E+7
Fe-59	1.20E+8	1.95E+8	-	-	5.65E+7	2.03E+8	9.71E+7
Co-57	-	3.84E+6	-	-	-	3.14E+7	7.77E+6
Co-58	-	1.21E+7	-	-	-	7.08E+7	3.72E+7
Co-60	-	4.32E+7	-	-	-	2.39E+8	1.27E+8
Ni-63	2.96E+10	1.59E+9	-	-	-	1.07E+8	1.01E+9
Zn-65	4.13E+9	1.10E+10	-	6.94E+9	-	1.93E+9	6.85E+9
Rb-86	-	8.77E+9	-	-	-	5.64E+8	5.39E+9
Sr-89	6.62E+9	-	-	-	-	2.56E+8	1.89E+8
Sr-90	1.12E+11	-	-	-	-	1.51E+9	2.83E+10
Y-91	3.91E+4	-	-	-	-	5.21E+6	1.04E+3
Zr-95	3.84E+3	8.45E+2	-	1.21E+3	-	8.81E+5	7.52E+2
Nb-95	3.18E+5	1.24E+5	-	1.16E+5	-	2.29E+8	8.84E+4
Ru-103	4.29E+3	-	-	1.08E+4	-	1.11E+5	1.65E+3
Ru-106	9.24E+4	-	-	1.25E+5	-	1.44E+6	1.15E+4
Ag-110m	2.09E+8	1.41E+8	-	2.63E+8	-	1.68E+10	1.13E+8
Sb-124	1.09E+8	1.41E+8	2.40E+5	-	6.03E+7	6.79E+8	3.81E+7
Sb-125	8.70E+7	1.41E+6	8.06E+4	-	4.85E+7	2.08E+8	1.82E+7
Te-125m	7.38E+7	2.00E+7	2.07E+7	-	-	7.12E+7	9.84E+6
Te-127m	2.08E+8	5.60E+7	4.97E+7	5.93E+8	-	1.68E+8	2.47E+7
Te-129m	2.72E+8	7.61E+7	8.78E+7	8.00E+8	-	3.32E+8	4.23E+7
I-131	1.30E+9	1.31E+9	4.34E+11	2.15E+9	-	1.17E+8	7.46E+8
I-132	6.86E-1	1.26E+0	5.85E+1	1.93E+0	-	1.48E+0	5.80E-1
I-133	1.76E+7	2.18E+7	4.04E+9	3.63E+7	-	8.77E+6	8.23E+6
I-134	-	-	-	-	-	-	-
I-135	5.84E+4	1.05E+5	9.30E+6	1.61E+5	-	8.00E+4	4.97E+4
Cs-134	2.26E+10	3.71E+10	-	1.15E+10	4.13E+9	2.00E+8	7.83E+9
Cs-136	1.00E+9	2.76E+9	-	1.47E+9	2.19E+8	9.70E+7	1.79E+9
Cs-137	3.22E+10	3.09E+10	-	1.01E+10	3.62E+9	1.93E+8	4.55E+9
Ba-140	1.17E+8	1.03E+5	-	3.34E+4	6.12E+4	5.94E+7	6.84E+6
Ce-141	2.19E+4	1.09E+4	-	4.78E+3	-	1.36E+7	1.62E+3
Ce-144	1.62E+6	5.09E+5	-	2.82E+5	-	1.33E+8	8.66E+4
Pr-143	7.23E+2	2.17E+2	-	1.17E+2	-	7.80E+5	3.59E+1
Nd-147	4.45E+2	3.60E+2	-	1.98E+2	-	5.71E+5	2.79E+1

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Grass-Cow-Milk Pathway Dose Factors - INFANT  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ) for H-3 and C-14  
 ( $\text{m}^2 \cdot \text{mrem}/\text{yr}$  per  $\mu\text{Ci}/\text{sec}$ ) for others

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	2.38E+3	2.38E+3	2.38E+3	2.38E+3	2.38E+3	2.38E+3
C-14	3.23E+6	6.89E+5	6.89E+5	6.89E+5	6.89E+5	6.89E+5	6.89E+5
P-32	1.60E+11	9.42E+9	-	-	-	2.17E+9	6.21E+9
Cr-51	-	-	1.05E+5	2.30E+4	2.05E+5	4.71E+6	1.61E+5
Mn-54	-	3.89E+7	-	8.63E+6	-	1.43E+7	8.83E+6
Fe-55	1.35E+8	8.72E+7	-	-	4.27E+7	1.11E+7	2.33E+7
Fe-59	2.25E+8	3.93E+8	-	-	1.16E+8	1.88E+8	1.55E+8
Co-57	-	8.95E+6	-	-	-	3.05E+7	1.46E+7
Co-58	-	2.43E+7	-	-	-	6.05E+7	6.06E+7
Co-60	-	8.81E+7	-	-	-	2.10E+8	2.08E+8
Ni-63	3.49E+10	2.16E+9	-	-	-	1.07E+8	1.21E+9
Zn-65	5.55E+9	1.90E+10	-	9.23E+9	-	1.61E+10	8.78E+9
Rb-86	-	2.22E+10	-	-	-	5.69E+8	1.10E+10
Sr-89	1.26E+10	-	-	-	-	2.59E+8	3.61E+8
Sr-90	1.22E+11	-	-	-	-	1.52E+9	3.10E+10
Y-91	7.33E+4	-	-	-	-	5.26E+6	1.95E+3
Zr-95	6.83E+3	1.66E+3	-	1.79E+3	-	8.28E+5	1.18E+3
Nb-95	5.93E+5	2.44E+5	-	1.75E+5	-	2.06E+8	1.41E+5
Ru-103	8.69E+3	-	-	1.81E+4	-	1.06E+5	2.91E+3
Ru-106	1.90E+5	-	-	2.25E+5	-	1.44E+6	2.38E+4
Ag-110m	3.86E+8	2.82E+8	-	4.03E+8	-	1.46E+10	1.86E+8
Sb-124	2.09E+8	3.08E+6	5.56E+5	-	1.31E+8	6.46E+8	6.49E+7
Sb-125	1.49E+8	1.45E+6	1.87E+5	-	9.38E+7	1.99E+8	3.07E+7
Te-125m	1.51E+8	5.04E+7	5.07E+7	-	-	7.18E+7	2.04E+7
Te-127m	4.21E+8	1.40E+8	1.22E+8	1.04E+9	-	1.70E+8	5.10E+7
Te-129m	5.59E+8	1.92E+8	2.15E+8	1.40E+9	-	3.34E+8	8.62E+7
I-131	2.72E+9	3.21E+9	1.05E+12	3.75E+9	-	1.15E+8	1.41E+9
I-132	1.42E+0	2.89E+0	1.35E+2	3.22E+0	-	2.34E+0	1.03E+0
I-133	3.72E+7	5.41E+7	9.84E+9	6.36E+7	-	9.16E+6	1.58E+7
I-134	-	-	1.01E-9	-	-	-	-
I-135	1.21E+5	2.41E+5	2.16E+7	2.69E+5	-	8.74E+4	8.80E+4
Cs-134	3.65E+10	6.80E+10	-	1.75E+10	7.18E+9	1.85E+8	6.87E+9
Cs-136	1.96E+9	5.77E+9	-	2.30E+9	4.70E+8	8.76E+7	2.15E+9
Cs-137	5.15E+10	6.02E+10	-	1.62E+10	6.55E+9	1.88E+8	4.27E+9
Ba-140	2.41E+8	2.41E+5	-	5.73E+4	1.48E+5	5.92E+7	1.24E+7
Ce-141	4.33E+4	2.64E+4	-	8.15E+3	-	1.37E+7	3.11E+3
Ce-144	2.33E+6	9.52E+5	-	3.85E+5	-	1.33E+8	1.30E+5
Pr-143	1.49E+3	5.59E+2	-	2.08E+2	-	7.89E+5	7.41E+1
Nd-147	8.82E+2	9.06E+2	-	3.49E+2	-	5.74E+5	5.55E+1

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Vegetation Pathway Dose Factors - ADULT  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ) for H-3 and C-14  
 ( $\text{m}^2 \cdot \text{mrem}/\text{yr}$  per  $\mu\text{Ci}/\text{sec}$ ) for others

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	2.26E+3	2.26E+3	2.26E+3	2.26E+3	2.26E+3	2.26E+3
C-14	8.97E+5	1.79E+5	1.79E+5	1.79E+5	1.79E+5	1.79E+5	1.79E+5
P-32	1.40E+9	8.73E+7	-	-	-	1.58E+8	5.42E+7
Cr-51	-	-	2.79E+4	1.03E+4	6.19E+4	1.17E+7	4.66E+4
Mn-54	-	3.11E+8	-	9.27E+7	-	9.54E+8	5.94E+7
Fe-55	2.09E+8	1.45E+8	-	-	8.06E+7	8.29E+7	3.37E+7
Fe-59	1.27E+8	2.99E+8	-	-	8.35E+7	9.96E+8	1.14E+8
Co-57	-	1.17E+7	-	-	-	2.97E+8	1.95E+7
Co-58	-	3.09E+7	-	-	-	6.26E+8	6.92E+7
Co-60	-	1.67E+8	-	-	-	3.14E+9	3.69E+8
Ni-63	1.04E+10	7.21E+8	-	-	-	1.50E+8	3.49E+8
Zn-65	3.17E+8	1.01E+9	-	6.75E+8	-	6.36E+8	4.56E+8
Rb-86	-	2.19E+8	-	-	-	4.32E+7	1.02E+8
Sr-89	9.96E+9	-	-	-	-	1.60E+9	2.86E+8
Sr-90	6.05E+11	-	-	-	-	1.75E+10	1.48E+10
Y-91	5.13E+6	-	-	-	-	2.82E+9	1.37E+5
Zr-95	1.19E+6	3.81E+5	-	5.97E+5	-	1.21E+9	2.58E+5
Nb-95	1.42E+5	7.91E+4	-	7.81E+4	-	4.80E+8	4.25E+4
Ru-103	4.80E+6	-	-	1.83E+7	-	5.61E+8	2.07E+6
Ru-106	1.93E+8	-	-	3.72E+8	-	1.25E+10	2.44E+7
Ag-110m	1.06E+7	9.76E+6	-	1.92E+7	-	3.98E+9	5.80E+6
Sb-124	1.04E+8	1.96E+6	2.52E+5	-	8.08E+7	2.95E+9	4.11E+7
Sb-125	1.36E+8	1.52E+6	1.39E+5	-	1.05E+8	1.50E+9	3.25E+7
Te-125m	9.66E+7	3.50E+7	2.90E+7	3.93E+8	-	3.86E+8	1.29E+7
Te-127m	3.49E+8	1.25E+8	8.92E+7	1.42E+9	-	1.17E+9	4.26E+7
Te-129m	2.55E+8	9.50E+7	8.75E+7	1.06E+9	-	1.28E+9	4.03E+7
I-131	8.09E+7	1.16E+8	3.79E+10	1.98E+8	-	3.05E+7	6.63E+7
I-132	5.74E+1	1.54E+2	5.38E+3	2.45E+2	-	2.89E+1	5.38E+1
I-133	2.12E+6	3.69E+6	5.42E+8	6.44E+6	-	3.31E+6	1.12E+6
I-134	1.06E-4	2.88E-4	5.00E-3	4.59E-4	-	2.51E-7	1.03E-4
I-135	4.08E+4	1.07E+5	7.04E+6	1.71E+5	-	1.21E+5	3.94E+4
Cs-134	4.66E+9	1.11E+10	-	3.59E+9	1.19E+9	1.94E+8	9.07E+9
Cs-136	4.20E+7	1.66E+8	-	9.24E+7	1.27E+7	1.89E+7	1.19E+8
Cs-137	6.36E+9	8.70E+9	-	2.95E+9	9.81E+8	1.68E+8	5.70E+9
Ba-140	1.29E+8	1.62E+5	-	5.49E+4	9.25E+4	2.65E+8	8.43E+6
Ce-141	1.96E+5	1.33E+5	-	6.17E+4	-	5.08E+8	1.51E+4
Ce-144	3.29E+7	1.38E+7	-	8.16E+6	-	1.11E+10	1.77E+6
Pr-143	6.34E+4	2.54E+4	-	1.47E+4	-	2.78E+8	3.14E+3
Nd-147	3.34E+4	3.86E+4	-	2.25E+4	-	1.85E+8	2.31E+3



Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Vegetation Pathway Dose Factors - TEENAGER  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ) for H-3 and C-14  
 ( $\text{m}^2 \cdot \text{mrem}/\text{yr}$  per  $\mu\text{Ci}/\text{sec}$ ) for others

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	2.59E+3	2.59E+3	2.59E+3	2.59E+3	2.59E+3	2.59E+3
C-14	1.45E+6	2.91E+5	2.91E+5	2.91E+5	2.91E+5	2.91E+5	2.91E+5
P-32	1.61E+9	9.96E+7	-	-	-	1.35E+8	6.23E+7
Cr-51	-	-	3.44E+4	1.36E+4	8.85E+4	1.04E+7	6.20E+4
Mn-54	-	4.52E+8	-	1.35E+8	-	9.27E+8	8.97E+7
Fe-55	3.25E+8	2.31E+8	-	-	1.46E+8	9.98E+7	5.38E+7
Fe-59	1.81E+8	4.22E+8	-	-	1.33E+8	9.98E+8	1.63E+8
Co-57	-	1.79E+7	-	-	-	3.34E+8	3.00E+7
Co-58	-	4.38E+7	-	-	-	6.04E+8	1.01E+8
Co-60	-	2.49E+8	-	-	-	3.24E+9	5.60E+8
Ni-63	1.61E+10	1.13E+9	-	-	-	1.81E+8	5.45E+8
Zn-65	4.24E+8	1.47E+9	-	9.41E+8	-	6.23E+8	6.86E+8
Rb-86	-	2.73E+8	-	-	-	4.05E+7	1.28E+8
Sr-89	1.51E+10	-	-	-	-	1.80E+9	4.33E+8
Sr-90	7.51E+11	-	-	-	-	2.11E+10	1.85E+11
Y-91	7.87E+6	-	-	-	-	3.23E+9	2.11E+5
Zr-95	1.74E+6	5.49E+5	-	8.07E+5	-	1.27E+9	3.78E+5
Nb-95	1.92E+5	1.06E+5	-	1.03E+5	-	4.55E+8	5.86E+4
Ru-103	6.87E+6	-	-	2.42E+7	-	5.74E+8	2.94E+6
Ru-106	3.09E+8	-	-	5.97E+8	-	1.48E+10	3.90E+7
Ag-110m	1.52E+7	1.44E+7	-	2.74E+7	-	4.04E+9	8.74E+6
Sb-124	1.55E+8	2.85E+6	3.51E+5	-	1.35E+8	3.11E+9	6.03E+7
Sb-125	2.14E+8	2.34E+6	2.04E+5	-	1.88E+8	1.66E+9	5.00E+7
Te-125m	1.48E+8	5.34E+7	4.14E+7	-	-	4.37E+8	1.98E+7
Te-127m	5.51E+8	1.96E+8	1.31E+8	2.24E+9	-	1.37E+9	6.56E+7
Te-129m	3.67E+8	1.36E+8	1.18E+8	1.54E+9	-	1.38E+9	5.81E+7
I-131	7.70E+7	1.08E+8	3.14E+10	1.85E+8	-	2.13E+7	5.79E+7
I-132	5.18E+1	1.36E+2	4.57E+3	2.14E+2	-	5.91E+1	4.87E+1
I-133	1.97E+6	3.34E+6	4.66E+8	5.86E+6	-	2.53E+6	1.02E+6
I-134	9.59E-5	2.54E-4	4.24E-3	4.01E-4	-	3.35E-6	9.13E-5
I-135	3.68E+4	9.48E+4	6.10E+6	1.50E+5	-	1.05E+5	3.52E+4
Cs-134	7.09E+9	1.67E+10	-	5.30E+9	2.02E+9	2.08E+8	7.74E+9
Cs-136	4.29E+7	1.69E+8	-	9.19E+7	1.45E+7	1.36E+7	1.13E+8
Cs-137	1.01E+10	1.35E+10	-	4.59E+9	1.78E+9	1.92E+8	4.69E+9
Ba-140	1.38E+8	1.69E+5	-	5.75E+4	1.14E+5	2.13E+8	8.91E+6
Ce-141	2.82E+5	1.88E+5	-	8.86E+4	-	5.38E+8	2.16E+4
Ce-144	5.27E+7	2.18E+7	-	1.30E+7	-	1.33E+10	2.83E+6
Pr-143	7.12E+4	2.84E+4	-	1.65E+4	-	2.34E+8	3.55E+3
Nd-147	3.63E+4	3.94E+4	-	2.32E+4	-	1.42E+8	2.36E+3

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Vegetation Pathway Dose Factors - CHILD  
 (mrem/yr per  $\mu\text{Ci}/\text{m}^3$ ) for H-3 and C-14  
 ( $\text{m}^2 \cdot \text{mrem}/\text{yr}$  per  $\mu\text{Ci}/\text{sec}$ ) for others

Nuclide	Bone	Liver	Thyroid	Kidney	Lung	GI-LLI	T.Body
H-3	-	4.01E+3	4.01E+3	4.01E+3	4.01E+3	4.01E+3	4.01E+3
C-14	3.50E+6	7.01E+5	7.01E+5	7.01E+5	7.01E+5	7.01E+5	7.01E+5
P-32	3.37E+9	1.58E+8	-	-	-	9.30E+7	1.30E+8
Cr-51	-	-	6.54E+4	1.79E+4	1.19E+5	6.25E+6	1.18E+5
Mn-54	-	6.61E+8	-	1.85E+8	-	5.55E+8	1.76E+8
Fe-55	8.00E+8	4.24E+8	-	-	2.40E+8	7.86E+7	1.31E+8
Fe-59	4.01E+8	6.49E+8	-	-	1.88E+8	6.76E+8	3.23E+8
Co-57	-	2.99E+7	-	-	-	2.45E+8	6.04E+7
Co-58	-	6.47E+7	-	-	-	3.77E+8	1.98E+8
Co-60	-	3.78E+8	-	-	-	2.10E+9	1.12E+9
Ni-63	3.95E+10	2.11E+9	-	-	-	1.42E+8	1.34E+9
Zn-65	8.12E+8	2.16E+9	-	1.36E+9	-	3.80E+8	1.35E+9
Rb-86	-	4.52E+8	-	-	-	2.91E+7	2.78E+8
Sr-89	3.59E+10	-	-	-	-	1.39E+9	1.03E+9
Sr-90	1.24E+12	-	-	-	-	1.67E+10	3.15E+11
Y-91	1.87E+7	-	-	-	-	2.49E+9	5.01E+5
Zr-95	3.90E+6	8.58E+5	-	1.23E+6	-	8.95E+8	7.64E+5
Nb-95	4.10E+5	1.59E+5	-	1.50E+5	-	2.95E+8	1.14E+5
Ru-103	1.55E+7	-	-	3.89E+7	-	3.99E+8	5.94E+6
Ru-106	7.45E+8	-	-	1.01E+9	-	1.16E+10	9.30E+7
Ag-110m	3.22E+7	2.17E+7	-	4.05E+7	-	2.58E+9	1.74E+7
Sb-124	3.52E+8	4.57E+6	7.78E+5	-	1.96E+8	2.20E+9	1.23E+8
Sb-125	4.99E+8	3.85E+6	4.62E+5	-	2.78E+8	1.19E+9	1.05E+8
Te-125m	3.51E+8	9.50E+7	9.84E+7	-	-	3.38E+8	4.67E+7
Te-127m	1.32E+9	3.56E+8	3.16E+8	3.77E+9	-	1.07E+9	1.57E+8
Te-129m	8.54E+8	2.39E+8	2.75E+8	2.51E+9	-	1.04E+9	1.33E+8
I-131	1.43E+8	1.44E+8	4.76E+10	2.36E+8	-	1.28E+7	8.18E+7
I-132	9.20E+1	1.69E+2	7.84E+3	2.59E+2	-	1.99E+2	7.77E+1
I-133	3.59E+6	4.44E+6	8.25E+8	7.40E+6	-	1.79E+6	1.68E+6
I-134	1.70E-4	3.16E-4	7.28E-3	4.84E-4	-	2.10E-4	1.46E-4
I-135	6.54E+4	1.18E+5	1.04E+7	1.81E+5	-	8.98E+4	5.57E+4
Cs-134	1.60E+10	2.63E+10	-	8.14E+9	2.92E+9	1.42E+8	5.54E+9
Cs-136	8.06E+7	2.22E+8	-	1.18E+8	1.76E+7	7.79E+6	1.43E+8
Cs-137	2.39E+10	2.29E+10	-	7.46E+9	2.68E+9	1.43E+8	3.38E+9
Ba-140	2.77E+8	2.43E+5	-	7.90E+4	1.45E+5	1.40E+8	1.62E+7
Ce-141	6.35E+5	3.26E+5	-	1.43E+5	-	4.07E+8	4.84E+4
Ce-144	1.27E+8	3.98E+7	-	2.21E+7	-	1.04E+10	6.78E+6
Pr-143	1.48E+5	4.46E+4	-	2.41E+4	-	1.60E+8	7.37E+3
Nd-147	7.16E+4	5.80E+4	-	3.18E+4	-	9.18E+7	4.49E+3

Table 2-4 (cont'd)  
 Pathway Dose Factors - Atmospheric Releases  
 R(io), Ground Plane Pathway Dose Factors  
 (m2 \* mrem/yr per  $\mu\text{Ci/sec}$ )

<u>Nuclide</u>	<u>Any Organ</u>
H-3	-
C-14	-
P-32	-
Cr-51	4.68E+6
Mn-54	1.34E+9
Fe-55	-
Fe-59	2.75E+8
Co-58	3.82E+8
Co-60	2.16E+10
Ni-63	-
Zn-65	7.45E+8
Rb-86	8.98E+6
Sr-89	2.16E+4
Sr-90	-
Y-91	1.08E+6
Zr-95	2.48E+8
Nb-95	1.36E+8
Ru-103	1.09E+8
Ru-106	4.21E+8
Ag-110m	3.47E+9
Te-125m	1.55E+6
Te-127m	9.17E+4
Te-129m	2.00E+7
I-131	1.72E+7
I-132	1.24E+6
I-133	2.47E+6
I-134	4.49E+5
I-135	2.56E+6
Cs-134	6.75E+9
Cs-136	1.49E+8
Cs-137	1.04E+10
Ba-140	2.05E+7
Ce-141	1.36E+7
Ce-144	6.95E+7
Pr-143	-
Nd-147	8.40E+6

## **APPENDIX A**

### **EVALUATION OF DEFAULT MPC VALUES**

#### **FOR LIQUID EFFLUENTS**

## APPENDIX A: Evaluation of Default MPC Value for Liquid Effluent Monitors

In accordance with the requirements of CONTROL 3.3.7.10 the radioactive effluent monitors shall be operable with alarm setpoints established to ensure that the concentration of radioactive material at the discharge point does not exceed the MPC value of 10 CFR 20, Appendix B, Table II, Column 2 (Appendix F). The determination of allowable radionuclide concentration and corresponding alarm setpoint is a function of the individual monitor.

In order to limit the need for routinely having to re-establish the alarm setpoints as a function of changing radionuclide distributions, a default alarm setpoint can be established. This default setpoint can be based on an evaluation of the radionuclide distribution from the 1997 to 1999 release data of the liquid effluents from Hope Creek and the effective MPC value for this distribution.

The effective MPC value for a radionuclide distribution is calculated by the equation:

$$MPC_e = \frac{\sum_i C_i(\text{gamma})}{\sum_i \frac{C_i}{MPC_i}(\text{gamma})} \quad (\text{A.1})$$

where:

- $MPC_e$  = an effective MPC value for a mixture of radionuclides ( $\mu\text{Ci/ml}$ )
- $C_i$  = concentration of radionuclide  $i$  in the mixture
- $MPC_i$  = the 10 CFR 20, Appendix B, Table II, Column II MPC value for radionuclide  $i$  ( $\mu\text{Ci/ml}$ ) Appendix F

Considering the average effective MPC values from 1997 thru 1999 releases it is reasonable to select an MPC value of  $4.09\text{E-}5 \mu\text{Ci/ml}$  as typical of liquid radwaste discharges. This value will be reviewed and adjusted as necessary based on the distribution history of effluents from Hope Creek. Using the value of  $4.09\text{E-}5 \mu\text{Ci/ml}$  to calculate the default alarm setpoint, results in a setpoint that:

- (1) Will not require frequent re-adjustment due to minor variations in the nuclide distribution which are typical of routine plant operations, and;
- (2) Will provide for a liquid radwaste discharge rate (as evaluated for each batch release) that is compatible with plant operations (Refer to Table 1-1).

## 1.0 Default Setpoint Determination:

Conservative alarm setpoints can be determined through the use of default parameters. Table 1-1 summarizes all current default values in use for Hope Creek.

### A. Liquid Radwaste Monitor (RE4861)

$$SP \leq \frac{MPC_e * CTBD * [1 - CF]}{RR} + bkg \quad (1.2)$$

Default values from Table 1-1:

MPC <sub>e</sub>	=	4.09E-5 µCi/ml
CTBD	=	12000 gpm
RR	=	176 gpm (LRW)
Bkg	=	0 µCi/ml
CF	=	0.8

$$SP \leq \frac{4.09E-5 * 12000 * 0.2}{176} + 0$$

$$SP < 5.58E-4 \mu Ci/ml$$

#### Correction Factor:

A correction factor must be applied to the default setpoint calculation in order to account for radiation monitor uncertainties and the contribution of non-gamma emitting radionuclides such as H-3, Sr, and Fe.

#### a. Radiation Monitor Inaccuracies:

Hope Creek PSBP 311649 lists a total loop accuracy of 30% for the liquid radwaste radiation monitors. A factor of 0.30 is applied to the default setpoint to ensure the trip setpoint is reached before the analytical limit is obtained.

**b. Non-Gamma Emitting Radionuclides:**

Non-gamma emitting radionuclides are analyzed on a monthly and quarterly basis from composite samples of liquid radwaste releases.

Nuclide	MPC ( $\mu\text{Ci/ml}$ )	Activity ( $\mu\text{Ci/ml}$ )	Activity / MPC
H-3	3E-3	1.0E-1	33.3
Fe-55	8E-4	4.7E-4	0.59
Sr-89	3E-6	1.6E-6	0.53
Sr-90	3E-7	2.0E-8	0.07
Total			34.5

The values in the table above represent the historical maximum reactor coolant values for non-gamma emitting nuclides (H3 is an assumed maximum). Reactor coolant values were chosen to represent the maximum concentration of non-gamma emitting radionuclides that could be released from Hope Creek station in liquid effluent. The activity values in the table are further diluted by a minimum factor of 68 prior to release to the Delaware River. The minimum dilution factor is obtained by using the minimum cooling tower blowdown flowrate of 12,000 gpm and the maximum release rate of 176 gpm.

A conservative correction factor for non-gamma emitting radionuclides can be obtained by using the highest Activity / MPC fraction and the minimum dilution factor as follows:

$$\text{Correction Factor (non-gamma)} = 34.5 / 68 = 0.5$$

An overall correction factor can be obtained by adding the correction factor for radiation monitor inaccuracies and non-gamma emitting radionuclides as follows:

$$\text{Overall Correction factor} = 0.3 + 0.5 = 0.8$$

**B. Cooling Tower Blowdown Radiation Monitor (RE8817)**

The cooling tower blowdown radiation monitor provides an Alarm only function for releases into the environment. The cooling tower blowdown is the final release point for liquid effluents from Hope Creek station to the Delaware River.

$$SP \leq MPC_r * 0.2$$

$$SP \leq 4.09\text{E-}5 \mu\text{Ci/ml} * 0.2$$

$$\underline{SP < 8.18\text{E-}6 \mu\text{Ci/ml (RE8817)}}$$

**C. Turbine Building Circulating Water Dewatering Sump Radiation Monitor (RE4557)**

The Turbine Building Circulating Water Dewatering Sump Radiation Monitor (RE4557) provides automatic termination of liquid radioactive releases from the Circulating Water Dewatering Sump. The sump pumps discharge to the circulating water system to the cooling tower. Radioactive materials other than tritium are not normally expected to be discharged through this pathway. Plant design and procedures maintain the setpoint at  $<2$  times background radiation levels. Releases from the sump at gamma activity concentrations less than the monitor setpoint are considered continuous releases since inputs to the sump would occur during discharge. Releases of activity above the established continuous release setpoint may be performed on a batch basis following sampling and analysis of the sump contents. Hope Creek calculation SP-0004 established a setpoint for the monitor at  $1.4\text{E-}02 \mu\text{Ci/ml}$  based on a postulated release of reactor steam into the sump. Using the MPCe determined for Liquid Radwaste and Cooling Tower Blowdown monitors, a more conservative maximum default value for batch releases can be determined:

$$SP \leq \frac{MPC_e * CTBD * [1 - CF]}{RR} + bkg \quad (1.2)$$

Default values from Table 1-1:

MPC <sub>e</sub>	=	4.09E-5 $\mu\text{Ci/ml}$
CTBD	=	12000 gpm
RR	=	100 gpm
Bkg	=	0 $\mu\text{Ci/ml}$
CF	=	0.8

$$SP \leq \frac{4.09\text{E-}5 * 12000 * 0.2}{100} + 0$$

$$SP < 9.82\text{E-}4 \mu\text{Ci/ml} \text{ (batch releases only)}$$

For continuous releases, the maximum setpoint should be less than  $2.4\text{E-}6 \mu\text{Ci/ml}$  above background to limit dose consequences from this pathway. (4HE-0241, CVF-98-0002)



**D. Releases from the Condensate Storage Tank**

If the Condensate Storage Tank (CST) requires release to the Delaware River, the discharge path would be through installed piping connected to the liquid Radwaste discharge path such that both the Liquid Radwaste Discharge Monitor and the Cooling Tower Blowdown monitor could detect and isolate/alarm on unexpected activity. Default setpoints are determined for potential releases of the CST.

**a. Liquid Radwaste Monitor (RE4861)**

$$SP \leq \frac{MPC_e * CTBD * [1 - CF]}{RR} + bkg \quad (1.2)$$

Default values from Table 1-1:

$MPC_e$	=	4.09E-5 $\mu\text{Ci/ml}$
CTBD	=	12000 gpm
RR	=	1300 gpm
Bkg	=	0 $\mu\text{Ci/ml}$
CF	=	0.8

$$SP \leq \frac{4.09E-5 * 12000 * 0.2}{1300} + 0$$

$$SP < 7.55E-5 \mu\text{Ci/ml (RE4861)}$$

**b. Cooling Tower Blowdown Radiation Monitor (RE8817)**

The cooling tower blowdown radiation monitor provides an Alarm only function for releases into the environment. The cooling tower blowdown is the final release point for liquid effluents from Hope Creek station to the Delaware River.

$$SP \leq MPC_e * 0.2$$

$$SP \leq 4.09E-5 \mu\text{Ci/ml} * 0.2$$

$$SP < 8.18E-6 \mu\text{Ci/ml (RE8817)}$$

TABLE A-1: CALCULATION OF EFFECTIVE MPC - HOPE CREEK

NUCLIDE	MPC	1997 ACTIVITY RELEASED (Ci)	1998 ACTIVITY RELEASED (Ci)	1999 ACTIVITY RELEASED (Ci)
Cr-51	2.00E-03	7.44E-03	2.37E-02	1.66E-02
Mn-54	1.00E-04	1.74E-02	7.48E-03	6.87E-02
Mn-56	1.00E-04	N/D	N/D	9.36E-06
Co-58	9.00E-05	5.68E-04	7.67E-04	3.30E-03
Co-60	3.00E-05	7.05E-03	6.78E-03	2.05E-02
Na-24	3.00E-05	N/D	7.02E-02	1.01E-03
Cs-137	2.00E-05	2.84E-06	1.03E-06	2.23E-04
Zn-65	1.00E-04	1.29E-03	1.39E-03	3.37E-03
Zn-69m	6.00E-05	1.58E-05	N/D	2.64E-04
Fe-59	5.00E-05	2.65E-03	1.62E-04	1.72E-02
As-76	2.00E-05	7.70E-05	N/D	9.94E-05
Nb-95	1.00E-04	N/D	N/D	1.69E-04
Mo-99	4.00E-05	9.56E-05	N/D	N/D
Zr-95	6.00E-05	N/D	N/D	4.08E-05
Tc-99m	3.00E-03	1.29E-04	2.05E-04	3.35E-04
Ru-105	1.00E-04	N/D	N/D	4.45E-05
Ag-110m	3.00E-05	4.85E-05	1.36E-05	3.88E-04
Sb-124	2.00E-05	N/D	N/D	4.63E-05
Cs-134	9.00E-06	N/D	N/D	7.13E-05
I-133	1.00E-06	N/D	3.11E-05	N/D
La-140	2.00E-05	N/D	N/D	4.82E-06
H-3	3.00E-03	1.24E+01	2.76E+01	2.95E+01
Fe-55	8.00E-04	2.28E-01	6.40E-03	2.83E-02
Sr-89	3.00E-06	8.56E-03	1.34E-05	3.29E-05
Total Curies (Gamma)		3.68E-02	1.11E-01	1.32E-01
SUM (Ci/MPCi) (Gamma)		4.93E+02	2.71E+03	1.87E+03
SUM (Ci/MPCi) (Non-Gamma)		7.27E+03	9.21E+03	9.88E+03
MPCe (μCi/ml)		7.45E-05	4.09E-05	7.03E-05

N/D=Not detected

**APPENDIX B**

**TECHNICAL BASIS FOR EFFECTIVE DOSE FACTORS**

**LIQUID RADIOACTIVE EFFLUENTS**

## APPENDIX B: Technical Basis for Effective Dose Factors - Liquid Effluent

The radioactive liquid effluents from Hope Creek from 1997 through 1999 were evaluated to determine the dose contribution of the radionuclide distribution. This analysis was performed to evaluate the use of a limited dose analysis for determining environmental doses, providing a simplified method of determining compliance with the dose limits of CONTROL 3.11.1.2. For the expected radionuclide distribution of effluent from Hope Creek during 1997 to 1999, the controlling organ is the GI-LLI (Bone dose was controlling in 1997 due to relatively high percentage of Fe-55). The calculated GI-LLI dose is predominately a function of the Zn-65, Fe-55, and Fe-59 releases. These radionuclides also contribute the large majority of the calculated total body dose. The results of this evaluation are presented in Table B-1.

For purposes of simplifying the details of the dose calculation process, it is conservative to identify a controlling, dose significant radionuclide and limit the calculation process to the use of the dose conversion factor for this nuclide. Multiplication of the total release (i.e., cumulative activity for all radionuclides) by this dose conversion factor provides for a dose calculation method that is simplified while also being conservative.

For the evaluation of the maximum organ dose, it is conservative to use the Fe-59 dose conversion factor (6.32E5 mrem/hr per  $\mu\text{Ci/ml}$ ). By this approach, the maximum organ dose will be overestimated since this nuclide has the highest organ dose fraction of all the radionuclides evaluated. For the total body calculation, the Zn-65 dose factor (2.32E5 mrem/hr per  $\mu\text{Ci/ml}$ , total body) is the highest among the identified dominant nuclides.

For evaluating compliance with the dose limits of CONTROL 3.11.1.2, the following simplified equations may be used:

### Total Body

$$D_{tb} = \frac{8.35E-04 * VOL * A_{i, tb} * C_i}{CTBD} \quad (B.1)$$

where:

- $D_{tb}$  = dose to the total body (mrem)
- $A_{i, tb}$  = 2.32E5, total body ingestion dose conversion factor for Zn-65 where A is dose conversion factor, i is isotope which is Zn-65, and TB is the total body (mrem/hr per  $\mu\text{Ci/ml}$ )
- VOL = volume of liquid effluent released (gal)
- $C_i$  = total concentration of all radionuclides ( $\mu\text{Ci/ml}$ )
- CTBD = average cooling tower blowdown discharge rate during release period (gal/min)
- 8.35E-04 = conversion factor (1.67E-2 hr/min) and the near field dilution factor 0.05

Substituting the value for the Zn-65 total body dose conversion factor, the equation simplified to:

$$D_{tb} = \frac{1.94E+02 * VOL * C_i}{CTBD} \quad (B.2)$$

#### Maximum Organ

$$D_{max} = \frac{8.35E-4 * VOL * A_{i, GI-LLI} * \sum_i C_i}{CTBD} \quad (B.3)$$

Where:

Dmax = maximum organ dose (mrem)  
 A<sub>i, GI-LLI</sub> = 6.32E5, GI-LLI ingestion dose conversion factor for Fe-59 where A is dose conversion factor, i is isotope which is Fe-59 and o is maximum organ which is the GI-LLI (mrem/hr per μCi/ml).

Substituting the value for A<sub>i, GI-LLI</sub> the equation simplifies to:

$$D_{max} = \frac{5.28E+2 * VOL * \sum_i C_i}{CTBD} \quad (B.4)$$

Tritium is not included in the limited analysis dose assessment for liquid releases, because the potential dose resulting from normal reactor releases is relatively negligible.

#### Near Field Dilution Factor

The near field dilution factor stems from NUREG-0133, Section 4.3. For plants with cooling towers, such as Hope Creek, a dilution factor is allowed so that the product of the average blowdown flow (in CFS) and the dilution factor is 1000 cfs or less. UFSAR Section 2.2.12 states that the dilution by river flow ranges from 14- to 40-fold in the mixing zone of effluent discharges and that existing cross currents tend to improve this overall dilution. The average minimum cooling tower blowdown for Hope Creek is 1.90E4 GPM (from FSAR 11.2). This converts to 42 CFS. Selecting a dilution factor of 20 (between 14 and 40 from the UFSAR) yields a product of 880 CFS, which is less than the 1000 cfs allowed by NUREG-0133. This near field dilution factor of 20 is inverted to a multiple of 0.05, which is used in the liquid effluent dose calculations.

**TABLE B-1: Adult Dose Contributions Fish and Invertebrate Pathways  
Hope Creek**

Nuclide	Release (Ci)	TB Dose Fraction	GI-LLI Dose Fraction	Bone Dose Fraction	Liver Dose Fraction	Year
Fe-55	2.28E-01	0.77	0.63	0.96	0.86	1997
Fe-55	6.40E-03	0.12	0.12	0.58	0.22	1998
Fe-55	2.83E-02	0.1	0.04	0.43	0.15	1999
Mn-54	1.74E-02	*	0.05	0	0.01	1997
Mn-54	7.48E-03	0.02	0.14	0	0.05	1998
Mn-54	6.87E-02	0.04	0.1	0	0.07	1999
Co-58	5.68E-04	*	*	0	*	1997
Co-58	7.67E-04	*	*	0	*	1998
Co-58	3.30E-03	*	*	0	*	1999
Fe-59	2.65E-03	0.08	0.23	0.02	0.05	1997
Fe-59	1.62E-04	0.03	0.09	0.02	0.03	1998
Fe-59	1.72E-02	0.51	0.7	0.4	0.5	1999
Co-60	7.05E-03	0.01	0.03	0	*	1997
Co-60	6.78E-03	0.06	0.2	0	0.01	1998
Co-60	2.05E-02	0.03	0.04	0	*	1999
Zn-65	1.29E-03	0.12	0.06	0.02	0.07	1997
Zn-65	1.39E-03	0.75	0.4	0.4	0.68	1998
Zn-65	3.37E-03	0.32	0.07	0.16	0.27	1999

\* = Less than 0.01

**APPENDIX C**

**TECHNICAL BASIS FOR EFFECTIVE DOSE FACTORS**

**GASEOUS RADIOACTIVE EFFLUENTS**

## APPENDIX C: Technical Basis for Effective Dose Factors - Gaseous Effluents

### Overview

The evaluation of doses due to releases of radioactive material to the atmosphere can be simplified by the use of effective dose transfer factors instead of using dose factors which are radionuclide specific. These effective factors, which are based on typical radionuclide distributions of releases, can be applied to the total radioactivity releases to approximate the dose in the environment. Instead of having to perform individual radionuclide dose analysis only a single multiplication (i.e.,  $K_{eff}$ ,  $M_{eff}$ , or  $N_{eff}$  times the total quantity of radioactive material releases) would be needed. The approach provides a reasonable estimate of the actual dose while eliminating the need for a detailed calculation technique.

### Determination of Effective Dose Factors

Effective dose transfer factors are calculated by the following equations:

$$K_{eff} = \sum_i (K_i * f_i) \quad (C.1)$$

Where:

$K_{eff}$  = the effective total body factor due to gamma emissions from all noble gases released.

$K_i$  = the total body dose factor due to gamma emissions from each noble gas radionuclide  $i$  released.

$f_i$  = the fractional abundance of noble gas radionuclide  $i$  relative to the total noble gas activity.

$$(L + 1.1M_{eff}) = \sum_i ((L_i + 1.1M_i) * f_i) \quad (C.2)$$

where:

$(L + 1.1M_{eff})$  = the effective skin dose factor due to beta and gamma emissions from all noble gases released.

$(L_i + 1.1M_i)$  = the skin dose factor due to beta and gamma emissions from each noble gas radionuclide  $i$  released.



$$M_{eff} = \sum_i (M_i * f_i) \quad (C.3)$$

where:

$M_{eff}$  = the effective air dose factor due to gamma emissions from all noble gases released.  
 $M_i$  = the air dose factor due to gamma emissions from each noble gas radionuclide  $i$  released.

$$N_{eff} = \sum_i (N_i * f_i) \quad (C.4)$$

where:

$N_{eff}$  = the effective air dose factor due to beta emissions from all noble gases released.  
 $N_i$  = the air dose factor due to beta emissions from each noble gas radionuclide  $i$  released.

Normally, it would be expected that past radioactive effluent data would be used for the determination of the effective dose factors. However, the noble gas releases from Hope Creek have a short history and with continued excellent fuel performance, has hampered efforts in collecting and detecting appreciable noble gas mixes of radionuclides. So, to provide a reasonable basis for the derivation of the effective noble gas dose factors, the source terms from ANSI N237-1976/ANS-18.1, "Source Term Specifications", Table 5 has been used as representing a typical distribution. The effective dose factors as derived are presented in Table C-1.

#### Application

To provide an additional degree of conservatism, a factor of 0.50 is introduced into the dose calculation process when the effective dose transfer factor is used. This conservatism provides additional assurance that the evaluation of doses by the use of a single effective factor will not significantly underestimate any actual doses in the environment.

For evaluating compliance with the dose limits of CONTROL 3.11.2.2, the following simplified equations may be used:

$$D_\gamma = \frac{3.17E-08}{0.50} * \chi/Q * M_{eff} * \sum_i Q_i \quad (C.5)$$

$$D_\beta = \frac{3.17E-08}{0.50} * \chi/Q * N_{eff} * \sum_i Q_i \quad (C.6)$$

Where:

- $D_\gamma$  = air dose due to gamma emissions for the cumulative release of all noble gases (mrad)
- $D_\beta$  = air dose due to beta emissions for the cumulative release of all noble gases (mrad)
- $X/Q$  = atmospheric dispersion to the controlling site boundary ( $\text{sec}/\text{m}^3$ )
- $M_{\text{eff}}$  =  $8.1\text{E}3$ , effective gamma-air dose factor ( $\text{mrad}/\text{yr}$  per  $\mu\text{Ci}/\text{m}^3$ )
- $N_{\text{eff}}$  =  $8.5\text{E}3$ , effective beta-air dose factor ( $\text{mrad}/\text{yr}$  per  $\mu\text{Ci}/\text{m}^3$ )
- $Q_i$  = cumulative release for all noble gas radionuclides ( $\mu\text{Ci}$ )
- $3.17\text{E}-08$  = conversion factor ( $\text{yr}/\text{sec}$ )
- $0.50$  = conservatism factor to account for the variability in the effluent data

Combining the constants, the dose calculation equations simplify to:

$$D_\gamma = 5.14\text{E}-4 * \lambda/Q * \sum_i Q_i \quad (\text{C.7})$$

$$D_\beta = 5.39\text{E}-4 * \lambda/Q * \sum_i Q_i \quad (\text{C.8})$$

The effective dose factors are to be used on a limited basis for the purpose of facilitating the timely assessment of radioactive effluent releases, particularly during periods of computer malfunction where a detailed dose assessment may be unavailable.

**TABLE C-1: Effective Dose Factors Noble Gases**

**Total Body and Skin Dose**

<u>Radionuclide</u>	<u>f<sub>i</sub></u>	<u>Total Body Effective</u> <u>K<sub>eff</sub></u> <u>(mrem/yr per μCi/m<sup>3</sup>)</u>	<u>Skin Effective</u> <u>(L + 1.1 M<sub>eff</sub>)</u> <u>(mrem/yr per μCi/m<sup>3</sup>)</u>
Kr83m	0.01	-----	-----
Kr85m	0.01	1.0E1	2.8E1
Kr87	0.04	2.4E2	6.6E2
Kr88	0.04	5.9E2	7.6E2
Kr89	0.27	4.5E3	7.9E3
Xe133	0.02	5.9E0	1.4E1
Xe135	0.05	9.0E1	2.0E2
Xe135m	0.06	1.9E2	2.6E2
Xe137	0.31	4.4E2	4.3E3
Xe138	0.19	1.7E3	2.7E3
Total		7.8E3	1.7E4

**Noble Gases - Air**

<u>Radionuclide</u>	<u>f<sub>i</sub></u>	<u>Total Body Effective</u> <u>K<sub>eff</sub></u> <u>(mrem/yr per μCi/m<sup>3</sup>)</u>	<u>Skin Effective</u> <u>(L + 1.1 M<sub>eff</sub>)</u> <u>(mrem/yr per μCi/m<sup>3</sup>)</u>
Kr83m	0.01	-----	3.0E0
Kr85m	0.01	1.2E1	2.0E1
Kr87	0.04	2.5E2	4.1E2
Kr88	0.04	6.1E2	1.2E2
Kr89	0.27	4.7E3	2.9E3
Xe133	0.02	7.0E0	2.1E1
Xe135	0.05	9.6E1	1.2E2
Xe135m	0.06	2.0E2	4.4E1
Xe137	0.31	4.7E2	3.9E3
Xe138	0.19	1.8E3	9.0E2
Total		8.1E3	8.4E3

\* Based on noble gas distribution from ANSI N237-1976/ANS-18.1, "Source Term Specification".

## **APPENDIX D**

### **TECHNICAL BASIS FOR EFFECTIVE DOSE PARAMETERS**

#### **GASEOUS RADIOACTIVE EFFLUENTS**

## APPENDIX D: Technical Basis for Effective Dose Parameters - Gaseous Effluent

The pathway dose factors for the controlling infant age group were evaluated to determine the controlling pathway, organ and radionuclide. This analysis was performed to provide a simplified method for determining compliance with CONTROL 3.11.2.3. For the infant age group, the controlling pathway is the grass - cow - milk (g/c/m) pathway. An infant receives a greater radiation dose from the g/c/m pathway than any other pathway. Of this g/c/m pathway, the maximum exposed organ including the total body, is the thyroid, and the highest dose contributor is radionuclide I-131. The results of this evaluation are presented in Table D-1.

For purposes of simplifying the details of the dose calculation process, it is conservative to identify a controlling, dose significant organ and radionuclide and limit the calculation process to the use of the dose conversion factor for the organ and radionuclide. Multiplication of the total release (i.e., cumulative activity for all radionuclides) by this dose conversion factor provides for a dose calculation method that is simplified while also being conservative.

For the evaluation of the dose commitment via a controlling pathway and age group, it is conservative to use the infant, g/c/m, thyroid, I-131 pathway dose factor (1.67E12 m<sup>2</sup>\*mrem/yr per  $\mu$ Ci/sec). By this approach, the maximum dose commitment will be overestimated since I-131 has the highest pathway dose factor of all radionuclides evaluated.

For evaluating compliance with the dose limits of CONTROL 3.11.2.3, the following simplified equation may be used:

$$D_{\max} = 3.17E-8 * W * R_{I-131} * \sum_i Q_i \quad (D.1)$$

Where:

$D_{\max}$	= maximum organ dose (mrem)
$W$	= atmospheric dispersion parameter to the controlling location (s) as identified in Table 2-3.
$X/Q$	= Atmospheric dispersion for inhalation pathway (sec/m <sup>3</sup> )
$D/Q$	= atmospheric disposition for vegetation, milk and ground plane exposure pathways (m <sup>-2</sup> )
$Q_i$	= cumulative release over the period of interest for radioiodines and particulates ( $\mu$ Ci).
3.17E-8	= conversion factor (yr/sec)
$R_{I-131}$	= I-131 dose parameter for the thyroid for the identified controlling pathway. = 1.05E12, infant thyroid dose parameter with the grass - cow - milk pathway controlling (m <sup>2</sup> mrem/yr per $\mu$ Ci/sec)

The ground plane exposure and inhalation pathways need not be considered when the above simplified calculational method is used because of the overall negligible contribution of these pathways to the total thyroid dose. It is recognized that for some particulate radionuclides (e.g., Co-60 and Cs-137), the ground exposure pathway may represent a higher dose contribution than either the vegetation or milk pathway. However, use of the I-131 thyroid dose parameter for all radionuclides will maximize the organ dose calculation, especially considering that no other radionuclides has a higher dose parameter for any organ via any pathway than I-131 for the thyroid via the milk pathway.

The location of exposure pathways and the maximum organ dose calculation may be based on the available pathways in the surrounding environment of Hope Creek as identified by the annual land-use census (CONTROL 3.12.2). Otherwise, the dose will be evaluated based on the predetermined controlling pathways as identified in Table 2-3.

**TABLE D-1: Infant Dose Contributions**  
**Fraction of Total Organ and Body Dose**

<u>Target Organs</u>	<u>PATHWAYS</u>	
	<u>Grass - Cow - Milk</u>	<u>Ground Plane</u>
Total Body	0.02	0.15
Bone	0.23	0.14
Liver	0.09	0.15
Thyroid	0.59	0.15
Kidney	0.02	0.15
Lung	0.01	0.14
GI-LLI	0.02	0.15

**TABLE D-2**  
**Fraction of Dose Contribution by Pathway**

<u>Pathway</u>	<u>Frac</u>
Grass-Cow-Milk	0.92
Ground Plane	0.08
Inhalation	N/A

## **APPENDIX E**

### **RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM -**

#### **SAMPLE TYPE, LOCATION AND ANALYSIS**



## APPENDIX E: Radiological Environmental Monitoring Program

### SAMPLE DESIGNATION

Samples are identified by a three part code. The first two letters are the power station identification code, in this case "SA". The next three letters are for the media sampled.

AIO = Air Iodine	IDM = Immersion Dose (TLD)
APT = Air Particulates	MLK = Milk
ECH = Hard Shell Blue Crab	PWR = Potable Water (Raw)
ESF = Edible Fish	PWT = Potable Water (Treated)
ESS = Sediment	
SWA = Surface Water	
WWA = Well Water	

The last four symbols are a location code based on direction and distance from the site. Of these, the first two represent each of the sixteen angular sectors of 22.5 degrees centered about the reactor site. Sector one is divided evenly by the north axis and other sectors are numbered in a clockwise direction; i.e., 2=NNE, 3=NE, 4=ENE, etc. The next digit is a letter which represents the radial distance from the plant:

S = On-site location	E = 4-5 miles off-site
A = 0-1 miles off-site	F = 5-10 miles off-site
B = 1-2 miles off-site	G = 10-20 miles off-site
C = 2-3 miles off-site	H = > 20 miles off-site
D = 3-4 miles off-site	

The last number is the station numerical designation within each sector and zone; e.g., 1,2,3,... For example; the designation SA-WWA-5D1 would indicate a sample in the SGS and HCGS program (SA), consisting of well water (WWA), which had been collected in sector number 5, centered at 90° (due east) with respect to the reactor site at a radial distance of 3 to 4 miles off-site, (therefore, radial distance D). The number 1 indicated that this is sampling station #1 in that particular sector.

### SAMPLING LOCATIONS

All sampling locations and specific information about the individual locations are given in Table E-1. Maps E-1 and E-2 show the locations of sampling stations with respect to the site.

TABLE E-1: REMP Sample Locations

## A. Direct Radiation Monitoring Locations (IDM)

<u>STATION CODE</u>	<u>STATION LOCATION</u>
1S1	0.55 mi. N of vent
2S2	0.4 mi. NNE of vent
2S4	0.59 mi. NNE of vent
3S1	0.58 mi. NE of vent
4S1	0.60 mi ENE of vent
5S1	1.0 mi. E of vent; site access road
6S2	0.21 mi. ESE of vent; observation building
7S1	0.12 mi. SE of vent; station personnel gate
10S1	0.14 mi. SSW of vent; circ water bldg.
11S1	0.09 mi. SW of vent; service water bldg.
15S1	0.57 mi. NW of vent
16S1	0.54 mi. NNW of vent
4D2	3.7 mi. ENE of vent; Alloway Creek Neck Road
5D1	3.5 mi. E of vent; local farm
10D1	3.9 mi. SSW of vent; Taylor's Bridge Spur
14D1	3.4 mi. WNW of vent; Bay View, Delaware
15D1	3.8 mi. NW of vent; Rt 9, Augustine Beach, DE.
2E1	4.4 mi. NNE of vent; local farm
3E1	4.1 mi. NE of vent; local farm
9E1	4.2 mi. S of vent
11E2	5.0 mi. SW of vent
12E1	4.4 mi. WSW of vent; Thomas Landing
13E1	4.2 mi. W of vent; Diehl House Lab
16E1	4.1 mi. NNW of vent; Port Penn
1F1	5.8 mi. N of vent; Fort Elfsborg
2F2	8.7 mi. NNE of vent; Salem Substation
2F5	7.4 mi. NNE of vent; Salem High School
2F6	7.3 mi. NNE of vent; PSE&G Training Center
3F2	5.1 mi. NE of vent; Hancocks Bridge Munc Bldg
3F3	8.6 mi. NE of vent; Quinton Township School
4F2	6.0 mi. ENE of vent; Mays Lane, Harmersville
5F1	6.5 mi. E of vent; Canton

TABLE E-1 (Cont'd)

## A. Direct Radiation Monitoring Locations (IDM) (Cont'd)

<u>STATION CODE</u>	<u>STATION LOCATION</u>
6F1	6.4 mi. ESE of vent; Stow Neck Road
7F2	9.1 mi. SE of vent; Bayside, NJ
10F2	5.8 mi. SSW of vent; Rt. 9
11F1	6.2 mi. SW of vent; Taylors Bridge, DE
12F1	9.4 mi. WSW of vent; Townsend Elementary School
13F2	6.5 mi. W of vent; Odessa, DE
13F3	9.3 mi. W of vent; Redding Middle School
13F4	9.8 mi. W of vent; Middletown, DE
14F2	6.6 mi. WNW of vent; Boyds Corner
15F3	5.4 mi. NW of vent
16F2	8.1 mi. NNW of vent; Delaware City Public School
1G3	19 mi. N of vent; N. Church St. Wilmington, DE
3G1	17 mi. NE of vent; local farm
10G1	12 mi. SSW of vent; Smyrna, Delaware
14G1	11.8 mi. WNW of Vent; Rte 286, Bethel Church Rd., DE
16G1	15 mi. NNW of vent; Wilmington Airport
3H1	32 mi. NE of vent; National Park, NJ

## B. Air Sampling Locations (AIO,APT)

<u>STATION CODE</u>	<u>STATION LOCATION</u>
5S1	1.0 mi. E of vent; site access road
5D1	3.5 mi. E of vent; local farm
16E1	4.1 mi. NNW of vent; Port Penn
1F1	5.8 mi. N of vent; Fort Elfsborg
2F6	7.3 mi. NNE of vent; PSE&G Training Center
14G1	11.8 mi. WNW of Vent; Rte 286, Bethel Church Rd., DE

Table E-1 (Cont'd)

## C. Surface Water Locations (SWA) - Delaware River

<u>STATION CODE</u>	<u>STATION LOCATION</u>
11A1	0.2 mi. SW of vent; Salem Outfall Area
12C1	2.5 mi. WSW of vent; West bank of Delaware River
7E1	4.5 mi. SE of vent; Delaware River
16F1	6.9 mi. NNW of vent; C&D Canal

## D. Ground Water Locations (WWA)

<u>STATION CODE</u>	<u>STATION LOCATION</u>
---------------------	-------------------------

No groundwater samples are required as this pathway is not directly affected by liquid effluents discharged from Salem Generating Station.

## E. Drinking Water Locations (PWR,PWT)

<u>STATION CODE</u>	<u>STATION LOCATION</u>
---------------------	-------------------------

No public drinking water samples or irrigation water samples are required as these pathways are not directly affected by liquid effluents discharged from Salem Generating Station.

## F. Water Sediment Locations (ESS)

<u>STATION CODE</u>	<u>STATION LOCATION</u>
11A1	0.2 mi. SW of vent; Salem outfall area
15A1	0.3 mi. NW of vent; Hope Creek outfall area
16A1	0.7 mi. NNW of vent; South Storm Drain outfall
12C1	2.5 mi. WSW of vent; West bank of Delaware river
7E1	4.5 mi. SE of vent; 1 mi West of Mad Horse River
16F1	6.9 mi. NNW of vent; C&D Canal
6S2	0.2 mi. ESE of vent; observation building

## G. Milk Sampling Locations (MLK)

<u>STATION CODE</u>	<u>STATION LOCATION</u>
2F9	7.5 mi. NNE of vent; local farm
11F3	5.3 mi. SW of vent; Townsend DE
14F4	7.6 mi. WNW of vent; local farm
3G1	17 mi. NE of vent; local farm

**Table E-1 (Cont'd)**

**H. Fish and Invertebrate Locations (ESF, ECH)**

<u>STATION CODE</u>	<u>STATION LOCATION</u>
11A1	0.2 mi. SW of vent; Salem outfall area
12C1	2.5 mi. WSW of vent; West bank of Delaware River
7E1	4.5 mi. SE of vent; 1 mi West of Mad Horse Creek

**I. Food Product Locations**

STATION CODE    STATION LOCATION

The Delaware River at the location of Salem and Hope Creek Nuclear Power Plants is a brackish water source. No irrigation of food products is performed using water in the vicinity from which liquid plant wastes have been discharged.

## SAMPLES COLLECTION AND ANALYSIS

<u>Sample</u>	<u>Collection Method</u>	<u>Analysis</u>
Air Particulate	Continuous low volume air sampler. Sample collected every week along with the filter change.	Gross Beta analysis on each weekly sample. Gamma spectrometry shall be performed if gross beta exceeds 10 times the yearly mean of the control station value. Samples shall be analyzed 24 hrs or more after collection to allow for radon and thorium daughter decay. Gamma isotopic analysis on quarterly composites.
Air Iodine	A TEDA impregnated charcoal cartridge is connected to air particulate air sampler and is collected weekly at filter change.	Iodine 131 analysis are performed on each weekly sample.
Crab and Fish	Two batch samples are sealed in a plastic bag or jar and frozen semi-annually or when in season.	Gamma isotopic analysis of edible portion on collection.
Sediment	A sediment sample is taken semi-annually.	Gamma isotopic analysis semi-annually.
Direct	2 TLD's will be collected from each location quarterly.	Gamma dose quarterly.

**SAMPLE COLLECTION AND ANALYSIS (Cont'd)**

<u>Sample</u>	<u>Collection Method</u>	<u>Analysis</u>
Milk	Sample of fresh milk is collected for each farm semi-monthly when cows are in pasture, monthly at other times.	Gamma isotopic analysis and I-131 analysis on each sample on collection.
Water (Potable, Surface)	Sample to be collected monthly providing winter icing conditions allow.	Gamma isotopic monthly H-3 on quarterly surface sample, monthly on ground water sample.

FIGURE E-1: ONSITE SAMPLING LOCATIONS

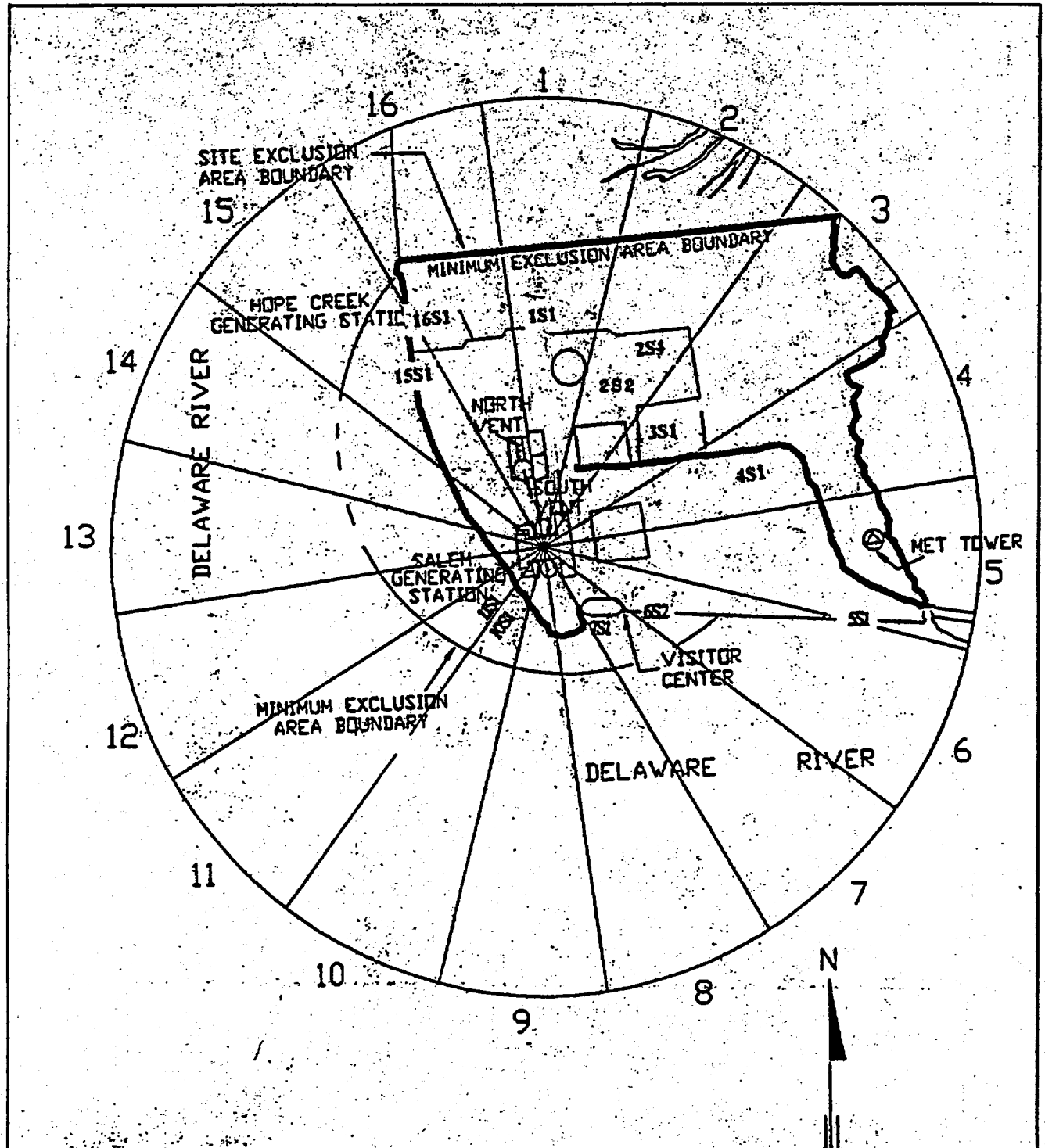
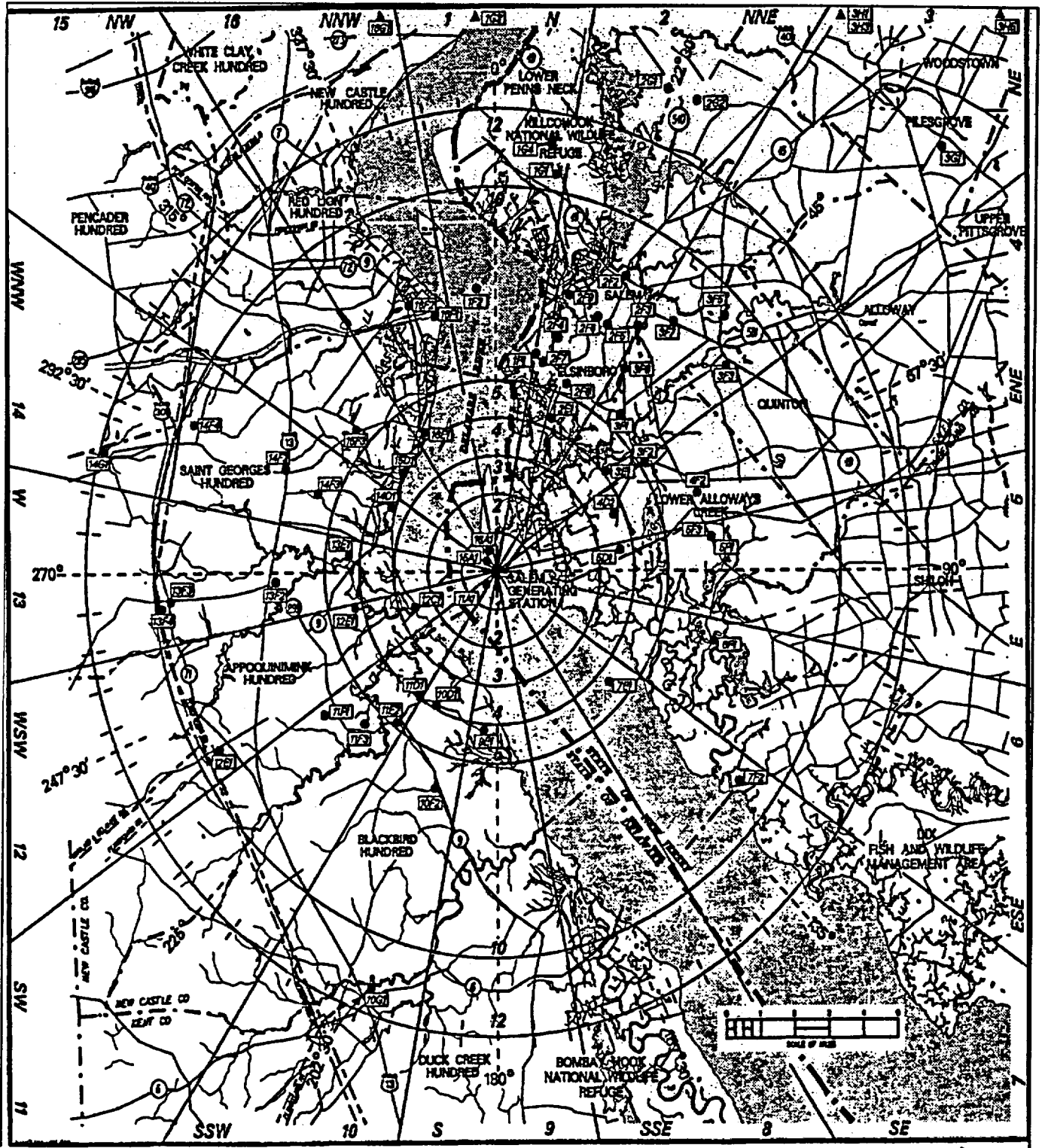




FIGURE E-2: OFF-SITE SAMPLING LOCATIONS



**APPENDIX F**  
**MAXIMUM PERMISSIBLE CONCENTRATIONS**  
**LIQUID EFFLUENTS**

**APPENDIX F: Maximum Permissible Concentration (MPC) Values For Liquid Effluents**

The following radionuclide concentrations were obtained from 10 CFR 20 Appendix B, Table II, Column 2 as revised January 1, 1991.

**Table F-1: Maximum Permissible Concentrations**

Element	Isotope	Soluble Conc ( $\mu\text{Ci/ml}$ )	Insoluble Conc. ( $\mu\text{Ci/ml}$ )
Actinium (89)	Ac-227	2E-6	3E-4
	Ac-228	9E-5	9E-5
Americium (95)	Am-241	4E-6	3E-5
	Am-242m	4E-6	9E-5
	Am-242	1E-4	1E-4
	Am-243	4E-6	3E-5
	Am-244	5E-3	5E-3
Antimony (51)	Sb-122	3E-5	3E-5
	Sb-124	2E-5	2E-5
	Sb-125	1E-4	1E-4
Arsenic (33)	As-73	5E-4	5E-4
	As-74	5E-5	5E-5
	As-76	2E-5	2E-5
	As-77	8E-5	8E-5
Astatine (85)	At-211	2E-6	7E-5
Barium (56)	Ba-131	2E-4	2E-4
	Ba-140	3E-5	2E-5
Berkelium (97)	Bk-249	6E-4	6E-4
	Bk-250	2E-4	2E-4
Beryllium (4)	Be-7	2E-3	2E-3
Bismuth (83)	Bi-206	4E-5	4E-5
	Bi-207	6E-5	6E-5
	Bi-210	4E-5	4E-5
	Bi-212	4E-4	4E-4
Bromine (35)	Br-82	3E-4	4E-5
Cadmium (48)	Cd-109	2E-4	2E-4
	Cd-115m	3E-5	3E-5
	Cd-115	3E-5	4E-5
Calcium (20)	Ca-45	9E-6	2E-4
	Ca-47	5E-5	3E-5
Californium (98)	Cf-249	4E-6	2E-5
	Cf-250	1E-5	3E-5
	Cf-251	4E-6	3E-5
	Cf-252	7E-6	7E-6
	Cf-253	1E-4	1E-4
	Cf-254	1E-7	1E-7

Table F-1 (Continued)

Element	Isotope	Soluble Conc. ( $\mu\text{Ci/ml}$ )	Insoluble Conc. ( $\mu\text{Ci/ml}$ )
Carbon (6)	C-14	8E-4	-----
Cerium (58)	Ce-141	9E-5	9E-5
	Ce-143	4E-5	4E-5
	Ce-144	1E-5	1E-5
Cesium (55)	Cs-131	2E-3	9E-4
	Cs-134m	6E-3	1E-3
	Cs-134	9E-6	4E-5
	Cs-135	1E-4	2E-4
	Cs-136	9E-5	6E-5
	Cs-137	2E-5	4E-5
Chlorine (17)	Cl-36	8E-5	6E-5
	Cl-38	4E-4	4E-4
Chromium (24)	Cr-51	2E-3	2E-3
Cobalt (27)	Co-57	5E-4	4E-4
	Co-58m	3E-3	2E-3
	Co-58	1E-4	9E-5
	Co-60	5E-5	3E-5
Copper (29)	Cu-64	3E-4	2E-4
Curium (96)	Cm-242	2E-5	2E-5
	Cm-243	5E-6	2E-5
	Cm-244	7E-6	3E-5
	Cm-245	4E-6	3E-5
	Cm-246	4E-6	3E-5
	Cm-247	4E-6	2E-5
	Cm-248	4E-7	1E-6
	Cm-249	2E-3	2E-3
Dysprosium (66)	Dy-165	4E-4	4E-4
	Dy-166	4E-5	4E-5
Einsteinium (99)	Es-253	2E-5	2E-5
	Es-254m	2E-5	2E-5
	Es-254	1E-5	1E-5
	Es-255	3E-5	3E-5
Erbium (68)	Er-169	9E-5	9E-5
	Er-171	1E-4	1E-4
Europium (63)	Eu-152 (9.2 hrs)	6E-5	6E-5
	Eu-152 (13 yrs)	8E-5	8E-5
	Eu-154	2E-5	2E-5
	Eu-155	2E-4	2E-4
Fermium (100)	Fm-254	1E-4	1E-4
	Fm-255	3E-5	3E-5
	Fm-256	9E-7	9E-7

Table F-1 (Continued)

Element	Isotope	Soluble Conc. ( $\mu\text{Ci/ml}$ )	Insoluble Conc. ( $\mu\text{Ci/ml}$ )
Fluorine (9)	F-18	8E-4	5E-4
Gadolinium (64)	Gd-153	2E-4	2E-4
	Gd-159	8E-5	8E-5
Gallium (31)	Ga-72	4E-5	4E-5
Germanium (32)	Ge-71	2E-3	2E-3
Gold (79)	Au-196	2E-4	1E-4
	Au-198	5E-5	5E-5
	Au-199	2E-4	2E-4
Hafnium (72)	Hf-181	7E-5	7E-5
Holmium (67)	Ho-166	3E-5	3E-5
Hydrogen (3)	H-3	3E-3	3E-3
Indium (49)	In-113m	1E-3	1E-3
	In-114m	2E-5	2E-5
	In-115m	4E-4	4E-4
	In-115	9E-5	9E-5
Iodine (53)	I-125	2E-7	2E-4
	I-126	3E-7	9E-5
	I-129	6E-8	2E-4
	I-131	3E-7	6E-5
	I-132	8E-6	2E-4
	I-133	1E-6	4E-5
	I-134	2E-5	6E-4
	I-135	4E-6	7E-5
Iridium (77)	Ir-190	2E-4	2E-4
	Ir-192	4E-5	4E-5
	Ir-194	3E-5	3E-5
Iron (26)	Fe-55	8E-4	2E-3
	Fe-59	6E-5	5E-5
Lanthanum (57)	La-140	2E-5	2E-5
Lead (82)	Pb-203	4E-4	4E-4
	Pb-210	1E-7	2E-4
	Pb-212	2E-5	2E-5
Lutetium (71)	Lu-177	1E-4	1E-4
Manganese (25)	Mn-52	3E-5	3E-5
	Mn-54	1E-4	1E-4
	Mn-56	1E-4	1E-4
Mercury (80)	Hg-197m	2E-4	2E-4
	Hg-197	3E-4	5E-4
	Hg-203	2E-5	1E-4
Molybdenum (42)	Mo-99	2E-4	4E-5

Table F-1 (Continued)

Element	Isotope	Soluble Conc. ( $\mu\text{Ci/ml}$ )	Insoluble Conc. ( $\mu\text{Ci/ml}$ )
Neodymium (60)	Nd-144	7E-5	8E-5
	Nd-147	6E-5	6E-5
	Nd-149	3E-4	3E-4
Neptunium (93)	Np-237	3E-6	3E-5
	Np-239	1E-4	1E-4
Nickel (28)	Ni-59	2E-4	2E-3
	Ni-63	3E-5	7E-4
	Ni-65	1E-4	1E-4
Niobium (41)	Nb-93m	4E-4	4E-4
	Nb-95	1E-4	1E-4
	Nb-97	9E-4	9E-4
Osmium (76)	Os-185	7E-5	7E-5
	Os-191m	3E-3	2E-3
	Os-191	2E-4	2E-4
	Os-193	6E-5	5E-5
Palladium (46)	Pd-103	3E-4	3E-4
	Pd-109	9E-5	7E-5
Phosphorus (15)	P-32	2E-5	2E-5
Platinum (78)	Pt-191	1E-4	1E-4
	Pt-193m	1E-3	1E-3
	Pt-193	9E-4	2E-3
	Pt-197m	1E-3	9E-4
	Pt-197	1E-4	1E-4
Plutonium (94)	Pu-238	5E-6	3E-5
	Pu-239	5E-6	3E-5
	Pu-240	5E-6	3E-5
	Pu-241	2E-4	1E-3
	Pu-242	5E-6	3E-5
	Pu-243	3E-4	3E-4
Polonium (84)	Po-210	7E-7	3E-5
Potassium (19)	K-42	3E-4	2E-5
Praseodymium(59)	Pr-142	3E-5	3E-5
	Pr-143	5E-5	5E-5
Promethium (61)	Pm-147	2E-4	2E-4
	Pm-149	4E-5	4E-5
Protactinium(91)	Pa-230	2E-4	2E-4
	Pa-231	9E-7	2E-5
	Pa-233	1E-4	1E-4

Table F-1 (Continued)

Element	Isotope	Soluble Conc. ( $\mu\text{Ci/ml}$ )	Insoluble Conc. ( $\mu\text{Ci/ml}$ )
Radium (88)	Ra-223	7E-7	4E-6
	Ra-224	2E-6	5E-6
	Ra-226	3E-8	3E-5
	Ra-228	3E-8	3E-5
Rhenium (75)	Re-183	6E-4	3E-4
	Re-186	9E-5	5E-5
	Re-187	3E-3	2E-3
	Re-188	6E-5	3E-5
Rhodium (45)	Rh-103m	1E-2	1E-2
	Rh-105	1E-4	1E-4
Rubidium (37)	Rb-86	7E-5	2E-5
	Rb-87	1E-4	2E-4
Ruthenium (44)	Ru-97	4E-4	3E-4
	Ru-103	8E-5	8E-5
	Ru-105	1E-4	1E-4
	Ru-106	1E-5	1E-5
Samarium (62)	Sm-147	6E-5	7E-5
	Sm-151	4E-4	4E-4
	Sm-153	8E-5	8E-5
Scandium (21)	Sc-46	4E-5	4E-5
	Sc-47	9E-5	9E-5
	Sc-48	3E-5	3E-5
Selenium (34)	Se-75	3E-4	3E-4
Silicon (14)	Si-31	9E-4	2E-4
Silver (47)	Ag-105	1E-4	1E-4
	Ag-110m	3E-5	3E-5
	Ag-111	4E-5	4E-5
Sodium (11)	Na-22	4E-5	3E-5
	Na-24	2E-4	3E-5
Strontium (38)	Sr-85m	7E-3	7E-3
	Sr-85	1E-4	2E-4
	Sr-89	3E-6	3E-5
	Sr-90	3E-7	4E-5
	Sr-91	7E-5	5E-5
	Sr-92	7E-5	6E-5
Sulfur (16)	S-35	6E-5	3E-4
Tantalum (73)	Ta-182	4E-5	4E-5

Table F-1 (Continued)

Element	Isotope	Soluble Conc. ( $\mu\text{Ci/ml}$ )	Insoluble Conc. ( $\mu\text{Ci/ml}$ )
Technetium (43)	Tc-96m	1E-2	1E-2
	Tc-96	1E-4	5E-5
	Tc-97m	4E-4	2E-4
	Tc-97	2E-3	8E-4
	Tc-99m	6E-3	3E-3
	Tc-99	3E-4	2E-4
Tellurium (52)	Te-125m	2E-4	1E-4
	Tc-127m	6E-5	5E-5
	Te-127	3E-4	2E-4
	Te-129m	3E-5	2E-5
	Te-129	8E-4	8E-4
	Te-131m	6E-5	4E-5
	Te-132	3E-5	2E-5
Terbium (65)	Tb-160	4E-5	4E-5
Thallium (81)	Tl-200	4E-4	2E-4
	Tl-201	3E-4	2E-4
	Tl-202	1E-4	7E-5
	Tl-204	1E-4	6E-5
Thorium (90)	Th-227	2E-5	2E-5
	Th-228	7E-6	1E-5
	Th-230	2E-6	3E-5
	Th-231	2E-4	2E-4
	Th-232	2E-6	4E-5
	Th-natural	2E-6	2E-5
	Th-234	2E-5	2E-5
Thulium (69)	Tm-170	5E-5	5E-5
	Tm-171	5E-4	5E-4
Tin (50)	Sn-113	9E-5	8E-5
	Sn-124	2E-5	2E-5
Tungsten (74)	W-181	4E-4	3E-4
	W-185	1E-4	1E-4
	W-187	7E-5	6E-5
Uranium (92)	U-230	5E-6	5E-6
	U-232	3E-5	3E-5
	U-233	3E-5	3E-5
	U-234	3E-5	3E-5
	U-235	3E-5	3E-5
	U-236	3E-5	3E-5
	U-238	4E-5	4E-5
	U-240	3E-5	3E-5
	U-natural	3E-5	3E-5



Table F-1 (Continued)

Element	Isotope	Soluble Conc. ( $\mu\text{Ci/ml}$ )	Insoluble Conc. ( $\mu\text{Ci/ml}$ )
Vanadium (23)	V-48	3E-5	3E-5
Ytterbium (70)	Yb-175	1E-4	1E-4
Yttrium	Y-90	2E-5	2E-5
	Y-91m	3E-3	3E-3
	Y-91	3E-5	3E-5
	Y-92	6E-5	6E-5
	Y-93	3E-5	3E-5
Zinc (30)	Zn-65	1E-4	2E-4
	Zn-69m	7E-5	6E-5
	Zn-69	2E-3	2E-3
Zirconium (40)	Zr-93	8E-4	8E-4
	Zr-95	6E-5	6E-5
	Zr-97	2E-5	2E-5
Any single radio-nuclide not listed above with decay mode other than alpha emission or spontaneous fission and with radio - active half-life greater than 2 hours		3E-6	3E-6
Any single radio-nuclide not listed above, which decays by alpha emission or spontaneous fission.		3E-8	3E-8

## Notes:

1. If the identity of any radionuclide is not known, the limiting values for purposes of this table shall be: 3E-8  $\mu\text{Ci/ml}$ .
2. If the identity and concentration of each radionuclide are known, the limiting values should be derived as follows: Determine, for each radionuclide in the mixture, the ratio between the quantity present in the mixture and the limit otherwise established in Appendix B for the specific radionuclide not in a mixture. The sum of such ratios for all the radionuclides in the mixture may not exceed "1" (i.e. "unity").