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A. Edward Scherer
Manager of
Nuclear Regulatory Affairs

April 28, 2005

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: **Docket Nos. 50-206, 50-361 and 50-362**
2004 Annual Radiological Environmental Operating Report
San Onofre Nuclear Generating Station Units 1, 2 and 3

Reference: NRC Inspection Report for the Pre-Operational Testing and First
Canister Loading at the Independent Spent Fuel Storage Installation, report dated
January 6, 2004.

Gentlemen:

As required by Technical Specification (TS) Section D6.9.1.3 of Unit 1 Facility Operating License DPR-13, and TS Section 5.7.1.2 of Facility Operating Licenses NPF-10 and NPF-15 for Units 2 and 3, respectively, this letter transmits the 2004 Annual Radiological Environmental Operating Report (AREOR) for San Onofre Unit 1 and Units 2 and 3.

The AREOR covers the operation of San Onofre Unit 1, and Units 2 and 3 during the calendar year 2004 and includes summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program. In addition, the AREOR includes the results for direct radiation monitoring near the Independent Spent Fuel Storage Installation as committed to in Attachment 2 to the reference.

If you require any additional information, please let me know.

Sincerely,

Enclosure

cc: B. S. Mallett, Regional Administrator, NRC Region IV
D. B. Spitzberg, Region IV, San Onofre Unit 1
T. W. Pruett, NRC Region IV, San Onofre Units 2 & 3
B. M. Pham, NRC Project Manager, San Onofre Units 2, and 3
J. C. Shepherd, NRC Project Manager, San Onofre Unit 1
C.C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3
S. Y. Hsu, California Department of Health Services

P.O. Box 128
San Clemente, CA 92672
949-368-7501
Fax 949-368-7575

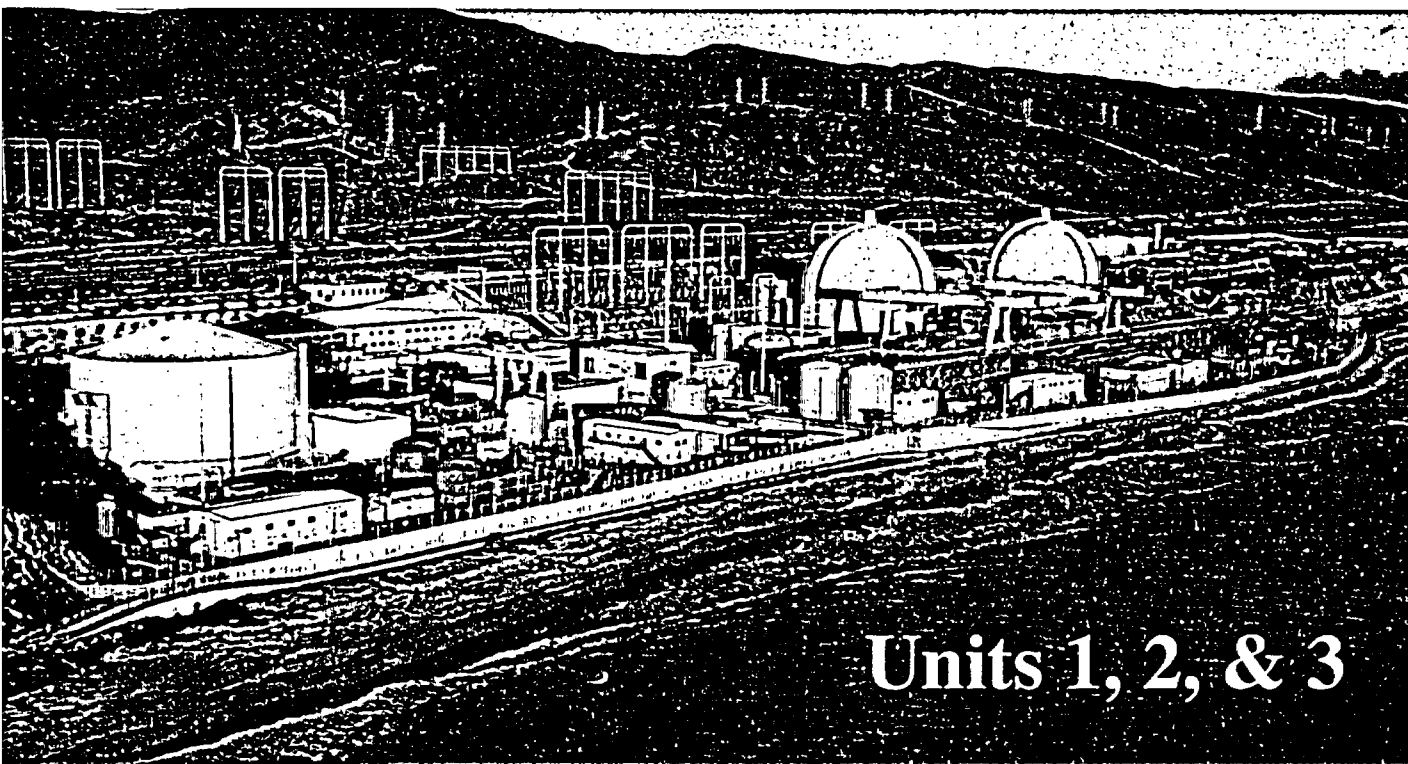
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2004

Radiological Environmental

Operating Report

San Onofre Nuclear Generating Station



Southern California Edison
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Docket Nos. 50-206, 50-361, 50-362
License Nos. DPR-13, NPF-10, NPF-15

April 2005



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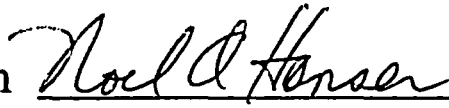
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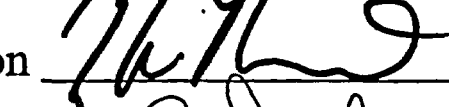
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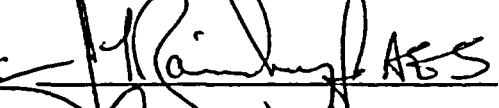
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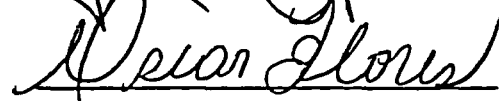
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Prepared by: N. A. Hansen  4/21/05

Approved by: M. J. Johnson  4/22/05

Approved by: H. W. Newton  4/22/05

Approved by: A. E. Scherer  4/26/05

Approved by: O. E. Flores  4/22/05

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TABLE OF CONTENTS

Page

Table of Contents	i
EXECUTIVE SUMMARY / INTRODUCTION	1
Objectives	2
Sample Collection	2
Sources of Radioactivity	2
Exposure Pathway	3
Regulatory Limits, Guidance, and Requirements	3
Data Management	5
Detection Limit Terminology	6
Conclusion	7
References	8
APPENDIX A - Sample Type and Sampling Location	9
Table A-1 REMP Sample Locations	10
Table A-2 Sector and Direction Designation for REMF Sample Location Map	15
Figure 5-1 San Onofre REMF - One Mile Radius	16
Figure 5-2 San Onofre REMF - Two Mile Radius	17
Figure 5-3 San Onofre REMF - Five Mile Radius	18
Figure 5-4 San Onofre REMF - 30 Mile North	19
Figure 5-5 San Onofre REMF - 45 Mile South	20
APPENDIX B - Summary, Results, and Discussions of 2004 Environmental Data	21
Summary	22
Results and Discussions of 2004 Environmental Data	23
Table B-1 Summary of SONGS Related Gamma Isotopic Analysis Confirmed above MDC	28
Table B-2 REMF Sample Analysis Summary for 2004	29

Statistical Summary of Remp Data for 2004	30
Table 1A Quarterly Gamma exposure (millirem).....	31
Table 2 Weekly Airborne Particulates - Gross Beta	32
Table 3 Weekly Radioiodine I-131 Activity	33
Table 4A Quarterly Composite Airborne Particulates Gamma Spectral Analysis	34
Table 5 Monthly Ocean Water Gamma Spectral Analysis	35
Table 7 Quarterly Composite Ocean Water Tritium Activity.....	37
Table 9A Monthly Drinking Water Analysis.....	38
Table 10 Semi-Annual Shoreline Sediment Gamma Spectral Analysis	40
Table 11 Semi-Annual Ocean Bottom Sediment Gamma Spectral Analysis	41
Table 12A Semi-Annual Non-Migratory Marine Animals Analysis - Flesh.....	42
Table 13A Semi-Annual Local Crops Gamma Spectral Analysis.....	49
Table 14 Annual Soil Analysis	51
Table 15 Semi-Annual Kelp Analysis.....	52
APPENDIX C - Summary of 2004 Quality Control Programs	53
Interlaboratory Cross-Check Program	54
Comparison of TLD and PIC Data	54
Quarterly Duplicate TLDs	55
Annual Duplicate TLDs	56
Calibration of Air Sampler Volume Meters.....	56
Table C-1 2004 Analytics Cross-Check Program Summary	57
APPENDIX D - Comparison of Operational to Preoperational Data and Analysis of Trends.....	60
Comparison of Operational to Preoperational Data and Analysis of Trends.....	61
Table D-1A Shoreline Sediments Concentration (pCi/g, wet weight) PreOperational and Operational Data SONGS Units 2/3.....	66
Table D-1B Ocean Bottom Sediments Concentration (pCi/g, wet weight) PreOperational and Operational Data SONGS Units 2/3.....	66

Table D-2	Marine Species Concentrations (pCi/g, wet weight) PreOperational and Operational Data SONGS Units 2/3	68
Table D-3	Soil PreOperational and Operational Data (pCi/g, wet weight) SONGS Units 2/3	73
Table D-4	Kelp PreOperational and Operational Data (pCi/g, wet weight) SONGS Units 2/3	73
APPENDIX E - Deviations from ODCM Sampling Requirements in 2004		74
Deviations from ODCM Sampling Requirements in 2004		75
Part I	Terrestrial Sampling	75
Part II	Marine Sampling	77
APPENDIX F - Land Use Census		79
Introduction		80
The Study Area		80
Methodology		80
Definitions		80
Table F-1	2004 SONGS Units 2/3 LUC Five Mile Radius Summary Sheet	82
Table F-2	2004 SONGS Unit 1 LUC Summary Sheet (Five Mile Radius)	84
APPENDIX G - Figures for 2004		86
Figure 1	Potential Radiation Exposure Pathways Leading to Man	87
Figure 2A	Direct Radiation Monitoring - Quarterly Environmental TLD Dose Measurements in mR Selected TLDs Located Very Close to SONGS vs. Selected CONTROL TLDs	88
Figure 2B	Direct Radiation Monitoring - Quarterly Environmental TLD Dose Measurements in mR Selected Outer Ring Locations vs. Selected CONTROL Locations	89
Figure 3A	Monthly Average Airborne Particulates - Gross Beta Activity (1976-1988) PreOperational and Operational Data for SONGS Units 2/3	90
Figure 3B	Monthly Average Airborne Particulates - Gross Beta Activity (1988-1997) PreOperational and Operational Data for SONGS Units 2/3	91
Figure 3C	2004 Weekly Airborne Particulate Gross Beta Activity SONGS Units 2/3	92

Figure 3D	2004 Weekly Airborne Particulate Gross Beta Activity SONGS Units 1, 2 and 3 January to December 2004	93
Figure 4	I-131 In Aquatic Kelp	94
APPENDIX H - Errata to the 2003 AREOR		95
APPENDIX I - REMP TLD's Co-located with NRC TLDs.....		96
APPENDIX J - ISFSI TLD DATA.....		98
Table J-1	ISFSI TLD DATA	100
Table J-2	REMP TLD DATA for TLDs within the EAB.....	102
Figure 6-1	ISFSI TLDs and REMP TLDs within the EAB.....	103
Figure 6-2	ISFSI TLDs and Selected REMP TLDs near to the ISFSI Foundation	104
Figure 7A	Direct Radiation Monitoring TLDs Closest to the ISFSI Foundation	105

Executive Summary

The data from the San Onofre Nuclear Generating Station (SONGS) Radiological Environmental Monitoring Program (REMP) clearly indicate that SONGS had no measurable radiological environmental impact during 2004.

Preparation of the 2004 Annual Radiological Environmental Operating Report (AREOR) used the data reduction protocol described in NUREG/CR-4007. A meaningful analysis of data at, near, or below the detection limit must necessarily involve a consideration of the degrees of uncertainty associated with the data. Excluding naturally occurring radionuclides, approximately 5% of the 2004 SONGS REMP data set was above the critical level (1.64 sigma), which is characteristic of a database consisting entirely of values statistically equal to zero. The data above the critical level have been summarized in the Statistical Summary of REMP Data found in Appendix B. The plant related radionuclides (Cs-137 in soil and I-131 in kelp) detected above the *a posteriori* MDC may be attributable to fallout from nuclear weapons testing (Cs-137) and medical administrations of radionuclides (I-131). These isotopes have been detected at indicator as well as control locations in past years. The naturally occurring radionuclides (Be-7, K-40, and Th-228) detected were observed in both control and indicator locations at substantially similar concentrations and are not related to the operation of SONGS. The balance of 2004 SONGS REMP database displays behavior statistically equal to a null set. Refer to Appendix B for a more detailed discussion.

INTRODUCTION

SONGS consists of three pressurized water nuclear reactors housed in separate containment buildings. Unit 1 attained initial criticality June 1967 and was permanently retired from service in November 1992. Units 2/3 attained initial criticality in July 1982 and August 1983, respectively, and have been in operation to date.

The purpose of the REMP is to quantify ambient radiation levels in the environs of SONGS, and to identify and quantify concentrations of radioactivity in various environmental media in the vicinity of SONGS which have a potential radiation exposure pathway to man.

Thermoluminescent dosimeters (TLDs) were used to measure direct radiation levels. Sampled environmental media include soil, shoreline sediment (beach sand), air (particulate & iodine), local crops, non-migratory marine species, kelp, drinking water, ocean water, and ocean bottom sediments. Each of the samples was analyzed for both naturally-occurring and SONGS-related radionuclides.

The REMP is conducted in accordance with Section 5.0 of the SONGS Unit 1 and Units 2/3 Offsite Dose Calculation Manuals (ODCM).

To conform with 10CFR Part 50, Appendix I, Section IV-B.2, measured radioactivity concentrations in the environmental samples have been compared against predicted (calculated) ones to evaluate the relationship between quantities of radioactive material released in effluents and resultant radiation doses to individuals from principal pathways of exposure.

This comparison was documented in Appendix D of the 1993 AREOR, issued April, 1994. During 2004 no plant related radionuclides attributable to the operation of SONGS were detected outside the Exclusion Area Boundary.

A land use census was performed in 2004 to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census. Appendix F of the report identifies changes to the census and the resultant dose increase, if any, to individuals from principal pathways of exposures in conformance with 10CFR Part 50, Appendix I, Section IV. B.3.

OBJECTIVES

1. To fulfill the radiological environmental monitoring requirements of the ODCM and the Technical Specifications.
2. To detect any significant increase in the concentration of radionuclides in critical pathways.
3. To detect any significant change in ambient gamma radiation levels.
4. To verify that the operation of SONGS Units 1, 2 and 3 have no measurable (detrimental) effects on the health and safety of the public or the environment.

SAMPLE COLLECTION

Samples of various environmental media were obtained to meet the stated objectives. The selection of sample types was based on established critical pathways for the transfer of radionuclides through the environment to individuals, and the evaluation of data during the operational phase. Sampling locations were determined with consideration given to site meteorology, local demography, and land uses. Refer to Appendix A for a complete list of REMP sample locations as described in Table 5-4 of the ODCM.

Sampling locations were divided into two classes, indicator and control. Control stations were at locations considered to be unaffected by SONGS operations. All others are considered indicator locations and may be potentially affected by SONGS operations.

SOURCES OF RADIOACTIVITY

Plant-specific radionuclides are produced in the normal operation of a nuclear power plant. Most of the fission products are retained within the fuel and its cladding. A small fraction of fission products such as cesium-137 (Cs-137) and iodine-131 (I-131), and activation products such as cobalt-60 (Co-60), are present in the primary reactor cooling system. Noble gases are also produced during the fission process.

Radioactive liquid and gaseous waste releases to the ocean and the atmosphere may contain very minute concentrations of plant-produced radionuclides. The airborne radioactive noble gases released are mostly xenon and krypton, which are inert (non-reactive). They do not concentrate

in the body, but they may contribute to human radiation exposure as an immersion source for whole body exposure. Xenon-133 and argon-41 are the major radioactive noble gases released to the atmosphere, and their calculated offsite beta and gamma air doses are no greater than 0.1 mrad per year.

The releases of iodines and particulates in the gaseous and liquid effluents are small. The major radionuclides of interest are I-131, Cs-134, Cs-137, Co-58, and Co-60. The total releases for these radionuclides were well below applicable regulatory limits.

Tritium (H-3), the radioactive isotope of hydrogen, is the predominant radionuclide in the liquid effluents and is also present in gaseous effluents. Tritium is produced in the reactor water (coolant) as a result of boron activation and other nuclear reactions.

EXPOSURE PATHWAY

Figure 1 illustrates various exposure pathways resulting in radiation dose to the surrounding population from operation of a nuclear facility. Only a few pathways will have real dose potential and require detailed calculations.

a. External Exposure

External exposure to people during normal operations will include radioactive gases in gaseous effluent plumes, radionuclides deposited on soil, and vegetation, or shoreline sediments. Direct exposure from radionuclides in water during recreation or commercial fishing activity is insignificant. Accumulation in sediments has the greater potential as a source of exposure. Gamma dosimeters (TLDs) are the usual means of measuring direct radiation exposure since significant dose contributors are gamma-emitters.

b. Internal Exposure

The release of radioactivity in liquid effluents involves pathways such as fish consumption and direct exposure from the ocean water by swimming and the shoreline activities. Consumption of fish or crops from the area receiving liquid effluents and breathing noble gases from the gaseous effluents releases are the most probable sources of internal exposure.

The doses calculated from gaseous effluent, tritium, radioiodines, and particulates in the gaseous effluent within a five-mile distance from the plant were summarized in Appendix D of the 1993 AREOR. Refer to the 1993 AREOR for detailed information on this analysis.

REGULATORY LIMITS, GUIDANCE, AND REQUIREMENTS

*** 10CFR50**

The Code of Federal Regulations Title 10, Part 50, Appendix I.

* 40CFR190

The Environmental Protection Agency (EPA) has established environmental radiation protection standards for nuclear power plants in 40CFR190. The standards for normal operation recommended that the dose from all discharges of radioactivity should not exceed 25 mrem/yr. These limits are applicable to the sum of both liquid and gaseous effluents and direct radiation. The environmental doses calculated at SONGS are a small fraction of the dose limits established by the EPA.

* 10CFR20

10CFR20, Appendix B, Table II, "Effluent Concentrations" and Appendix C, "Concentration for Release to Sewerage"

Guidance:

* Regulatory Guide 4.1

Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants, 1975

* Regulatory Guide 4.2

Preparation of Environmental Reports for Nuclear Power Stations, 1976

* Regulatory Guide 4.8

Environmental Technical Specifications for Nuclear Power Plants, 1975

* Regulatory Guide 4.13

Performance, Testing, and Procedural Specification for Thermoluminescent Dosimetry: Environmental Applications, 1977

* NUREG-0133

Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants

* Regulatory Guide 1.109

Calculation of Annual Doses to Man from Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10CFR Part 50, Appendix I, 1977

* NUREG-1301

Offsite Dose Calculations Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors, Generic Letter 89-01, Supplement No. 1, 1991

* ANSI N545 (TLD's)

American National Standard Performance, Testing, And Procedural Specifications for Thermoluminescence Dosimetry (Environmental Application), 1975

* Regulatory Guide 4.15

Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment, 1979

* NUREG/CR-4007 Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements, 1984

DATA MANAGEMENT

The tabulated means, ranges and standard deviations presented in Appendix B were calculated following the standard format specified in Regulatory Guide 4.8, the Radiological Assessment Branch Technical Position, Revision 1, 1979, and in accordance with the protocol outlined in NUREG/CR-4007. A custom data management software package was used to perform the statistical analysis and tabulation of the data.

The REMP data are reviewed for accuracy and comparison against NRC reporting levels, and then entered into the REMP database. One of the REMP menus flags measurements exceeding the administrative levels (10% of the NRC reporting levels) established by Southern California Edison (SCE). The *a posteriori* minimum detectable concentration (MDC) is compared to the maximum value for the *a priori* Lower Limit of Detection (LLD) specified in the ODCM. This ensures that regulatory limits for the maximum LLD are met.

The impact of SONGS on the surrounding environment was assessed through a series of analyses. These analyses included: data reduction, comparisons of indicator to control locations, and summary (Appendix B); comparison of operational to preoperational environmental data (Appendix D); summary of deviations from sampling requirements and corrective actions taken (Appendix E); and finally the results of the 2004 Land Use Census reports including changes in the Land Uses from the previous year (Appendix F).

All Radiological Environmental Monitoring activities for San Onofre are assessed in accordance with Quality Assurance requirements as defined in Regulatory Guide 4.15. The Contracted Environmental Analysis Laboratory (CEAL) participated in an interlaboratory comparison program in partial fulfillment of the quality assurance requirements for environmental monitoring. The CEAL participated in cross check programs which meet the intent of Reg. Guide 4.15. Refer to Appendix C.

DETECTION LIMIT TERMINOLOGY

This report utilizes three distinct terms to describe the concept of “lower limit of detection” at various detection confidence levels. The terms are briefly defined below. For a more thorough discussion, the reader should refer to NUREG/CR-4007.

Critical level - Defined as 1.64 sigma. For a sufficiently large database of [isotopically analyzed] sample results, with the “true” activity being equal to zero, approximately 5% of the results should be above the critical level. The 2004 SONGS REMP data above the critical level have been summarized in the Statistical Summary of REMP Data found in Appendix B.

Lower Limit of Detection (LLD) - The LLD is the *a priori* (before the fact) lower limit of detection. This value is calculated for each isotope and every matrix based on typical or expected values of decay time, sample size, counter efficiency, etc. These values are listed in the ODCM and represent the maximum permissible value for the “lower limit of detection” for specified sample media.

Minimum Detectable Concentration (MDC) - The MDC is the *a posteriori* (after the fact) lower limit of detection based on actual decay time, measured sample size, counter efficiency as determined by recent calibration, etc. The MDC is compared to the LLD to verify that the measurement met the ODCM requirements for the maximum value of the LLD for the listed analytes. Values above the MDC are presumed to represent “detected” activity at the 95% detection confidence level.

CONCLUSION

Levels of radioactivity in environmental media are a function of several factors including: site release rates; meteorology; number, location, size and date of nuclear weapons tests; seasonal variability of fallout; soil conditions; local terrain and variability in the natural environment.

Radiological environmental data collected throughout 2004 have been evaluated to determine the impact, if any, of San Onofre operations on the surrounding environment. To accomplish this, several methods of evaluation were employed, namely:

1. Compilation and verification of all data, as well as a determination of those data considered to be significantly greater than background levels.
2. Environmental dose calculations and correlation of effluent releases with environmental concentrations (Refer to the 1993 AREOR).
3. Examination of time-dependent variations of pertinent radioisotopes in selected environmental media throughout the year at both indicator and control locations.
4. Comparison of radioactivity in various media in 2004 against the levels observed in pre-operational years.
5. Historical trending of radionuclides in various media during operational years.

In comparing these findings to the conservatively-defined limits of the facility operating licenses, it is concluded that the radiological environmental impact of the operation of SONGS through 2004 has been negligible, and the resulting dose to man is negligible.

REFERENCES

1. 10CFR20, 10CFR50
2. 1993 Radiological Environmental Operating Report for San Onofre Nuclear Generating Station, April 30, 1994.
3. Land Use Census for SONGS Units 1, 2 and 3 Radiological Environmental Monitoring Program, October 2004.
4. ODCM (Offsite Dose Calculation Manual) for SONGS Unit 1 and Units 2/3, Section 5.0, 2004.
5. SONGS Radiological Monitoring (RM) Procedures: SO123-RM-1 (SO123-IX-1.10).
6. L. Currie. 1968 "Limits for the Qualitative Detection and Quantitative Determination - Application to Radiochemistry," Analytical Chemistry, vol. 40 pp. 586-593

APPENDIX A
SAMPLE TYPE AND SAMPLING LOCATION

TABLE A-1

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE LOCATIONS

TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers due to program modifications)		DISTANCE* (miles)	DIRECTION* (Sector)
<i>Direct Radiation</i>			
1	City of San Clemente (Former SDG&E Offices)	5.7	NW
2	Camp San Mateo – MCB	3.5	N
3	Camp San Onofre – MCB	2.6	NE
4	Camp Horno – MCB	4.5	E
6	Old Route 101 (East-Southeast)	3.0	ESE
8	Noncommissioned Officers' Beach Club	1.4	NW
10	Bluff (Adjacent to PIC #1)	0.7	WNW
11	Former Visitors' Center	0.4 **	NW
12	South Edge of Switchyard	0.2 **	E
13	Southeast Site Boundary (Bluff)	0.4 **	ESE
15	Southeast Site Boundary (Office Building)	0.1 **	SSE
16	East Southeast Site Boundary	0.4 **	ESE
19	San Clemente Highlands	5.0	NNW
22	Former US Coast Guard Station - San Mateo Point	2.7	WNW
23	SDG&E Service Center Yard	8.1	NW
31	Aurora Park - Mission Viejo (CONTROL)	18.6	NNW
33	Camp Talega – MCB	5.7	N
34	San Onofre School – MCB	1.9	NW
35	Range 312 – MCB	4.7	NNE
36	Range 208C – MCB	4.2	NE
38	San Onofre State Beach Park	3.3	SE
40	SCE Training Center - Mesa (Adjacent to PIC #3)	0.7	NNW
41	Old Route 101 – East	0.3 **	E
44	Fallbrook Fire Station	17.7	E

* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

** Distances are within the Units 2/3 Site Boundary (0.4 mile in all sectors) and not required by the ODCMs.

*** Soil samples are not required by Technical Specifications.

**** Kelp samples are not required by Technical Specifications.

MCB Marine Corp Base Camp Pendleton

PIC Pressurized Ion Chamber

TABLE A-1

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE LOCATIONS

TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers due to program modifications)		DISTANCE* (miles)	DIRECTION* (Sector)
<i>Direct Radiation (Continued)</i>			
46	San Onofre State Beach Park	0.9	SE
47	Camp Las Flores – MCB	8.6	SE
49	Camp Chappo – MCB	12.8	ESE
50	Oceanside Fire Station (CONTROL)	15.6	SE
53	San Diego County Operations Center	44.3	SE
54	Escondido Fire Station	31.8	ESE
55	San Onofre State Beach (U1 West)	0.2 **	W
56	San Onofre State Beach (U1 West)	0.2 **	W
57	San Onofre State Beach (Unit 2)	0.1 **	WSW
58	San Onofre State Beach (Unit 3)	0.1 **	S
59	SONGS Meteorological Tower	0.3 **	WNW
61	Mesa - East Boundary (Adjacent to PIC #4)	0.7	N
62	MCB - Camp Pendleton (Adjacent to PIC #5)	0.6	NNE
63	MCB - Camp Pendleton (Adjacent to PIC #6)	0.6	NE
64	MCB - Camp Pendleton (Adjacent to PIC #7)	0.6	ENE
65	MCB - Camp Pendleton (Adjacent to PIC #8)	0.7	E
66	San Onofre State Beach (Adjacent to PIC #9)	0.6	ESE
67	Former SONGS Evaporation Pond (Adjacent to PIC #2)	0.6	NW
68	Range 210C – MCB	4.3	ENE
73	South Yard Facility	0.4 **	ESE
74	Oceanside City Hall (Backup CONTROL)	15.6	SE
75	Gate 25 MCB	4.6	SE
76	El Camino Real Mobil Station	4.6	NW
77	Area 62 Heavy Lift Pad	4.3	N
78	Sheep Valley	4.4	ESE

* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

** Distances are within the Units 2/3 Site Boundary (0.4 mile in all sectors) and not required by the ODCMs.

*** Soil samples are not required by Technical Specifications.

**** Kelp samples are not required by Technical Specifications.

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PIC Pressurized Ion Chamber

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TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers due to program modifications)		DISTANCE* (miles)	DIRECTION* (Sector)
<i>Airborne</i>			
1	City of San Clemente (City Hall)	5.1	NW
7	AWS Roof	0.18 **	NW
9	State Beach Park	0.6	ESE
10	Bluff	0.7	WNW
11	Mesa EOF	0.7	NNW
12	Former SONGS Evaporation Pond	0.6	NW
13	Marine Corp Base (Camp Pendleton East)	0.7	E
14	Mesa Medical Facility	0.7	NNW
15	Oceanside City Hall (CONTROL)	15.6	SE
<i>Soil Samples ***</i>			
1	Camp San Onofre	2.6	NE
2	Old Route 101 - East Southeast	3.0	ESE
3	Basilone Road / I-5 Freeway Off ramp	2.0	NW
5	Former Visitor's Center	0.4 **	NW
6	Oceanside (CONTROL)	16.0	SE

* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

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PIC Pressurized Ion Chamber

TABLE A-1

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TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers due to program modifications)		DISTANCE* (miles)	DIRECTION* (Sector)
<i>Ocean Water</i>			
A	Station Discharge Outfall - Unit 1	0.6	SW
B	Outfall - Unit 2	1.5	SW
C	Outfall - Unit 3	1.2	SSW
D	Newport Beach (CONTROL)	30.0	NW
<i>Drinking Water</i>			
4	Camp Pendleton Drinking Water Reservoir	2.2	NNW
5	Oceanside City Hall (CONTROL)	15.6	SE
<i>Shoreline Sediment (Beach Sand)</i>			
1	San Onofre State Beach (SE)	0.6	SE
2	San Onofre Surfing Beach	0.8	WNW
3	San Onofre State Beach (SE)	3.5	SE
4	Newport Beach North End (CONTROL)	29.2	NW
<i>Local Crops</i>			
1	San Clemente Ranch (San Mateo Canyon)	2.6	NW
2	Oceanside (CONTROL)	15-25	SE to ESE
4	San Clemente Residence (Ola Vista) with Garden	4.4	NW
6	SONGS Garden	0.4	NNW
<i>Non-Migratory Marine Animals</i>			
A	Unit 1 Outfall	0.9	WSW
B	Units 2/3 Outfall	1.5	SSW
C	Laguna Beach (CONTROL)	18.2	NW

* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

** Distances are within the Units 2/3 Site Boundary (0.4 mile in all sectors) and not required by the ODCMs.

*** Soil samples are not required by Technical Specifications.

**** Kelp samples are not required by Technical Specifications.

MCB Marine Corp Base Camp Pendleton

PIC Pressurized Ion Chamber

TABLE A-1

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE LOCATIONS

TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers due to program modifications)		DISTANCE* (miles)	DIRECTION* (Sector)
<i>Kelp ****</i>			
A	San Onofre Kelp Bed	1.5	S
B	San Mateo Kelp Bed	3.8	WNW
C	Barn Kelp Bed	6.3	SSE
E	Salt Creek (CONTROL)	11 to 13	WNW to NW
<i>Ocean Bottom Sediments</i>			
B	Unit 1 Outfall (0.6 mile West)	0.8	SSW
C	Unit 2 Outfall	1.6	SW
D	Unit 3 Outfall	1.2	SSW
E	Laguna Beach (CONTROL)	18.2	NW
F	SONGS Upcoast	0.9	WSW

* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

** Distances are within the Units 2/3 Site Boundary (0.4 mile in all sectors) and not required by the ODCMs.

*** Soil samples are not required by Technical Specifications.

**** Kelp samples are not required by Technical Specifications.

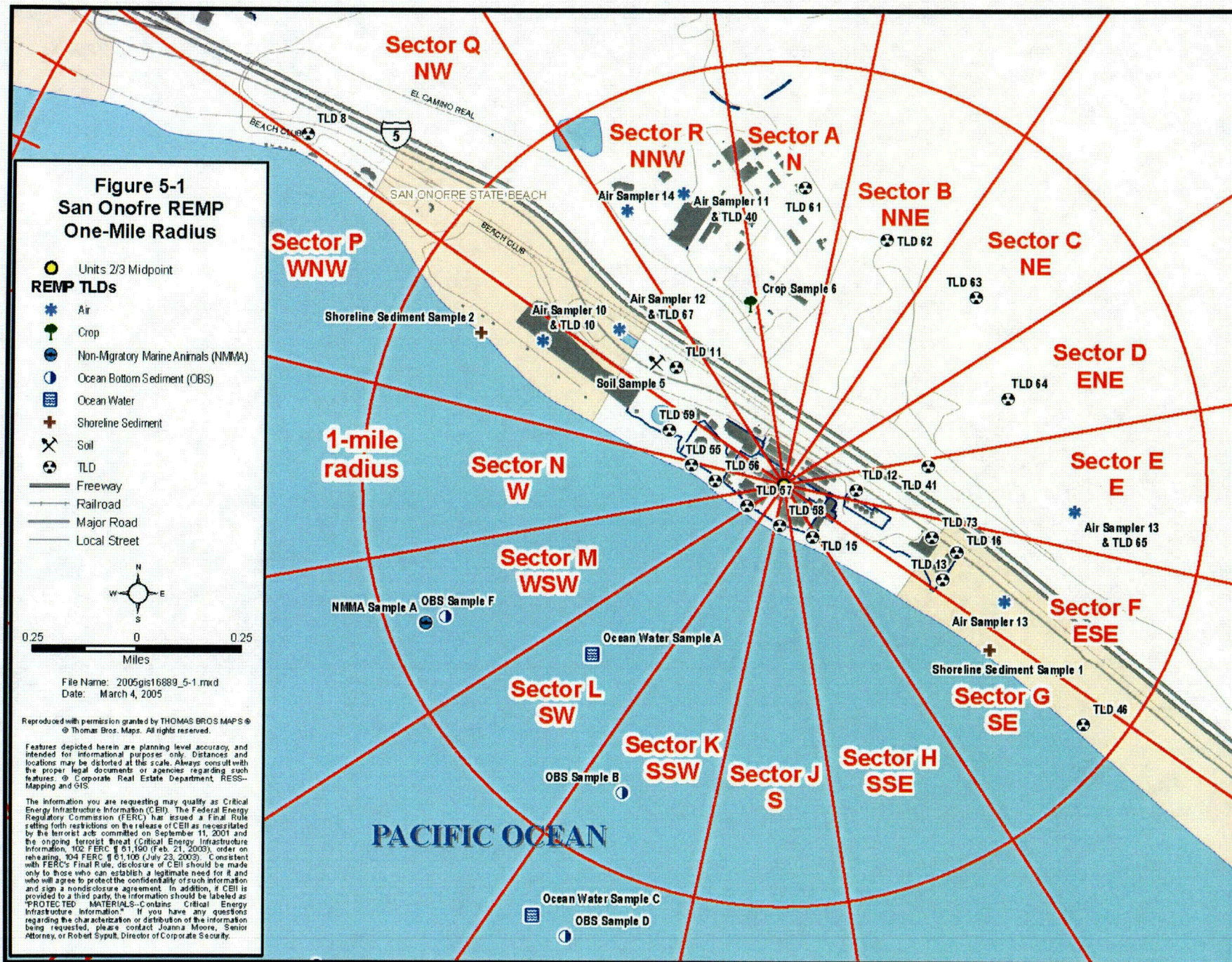
MCB Marine Corp Base Camp Pendleton

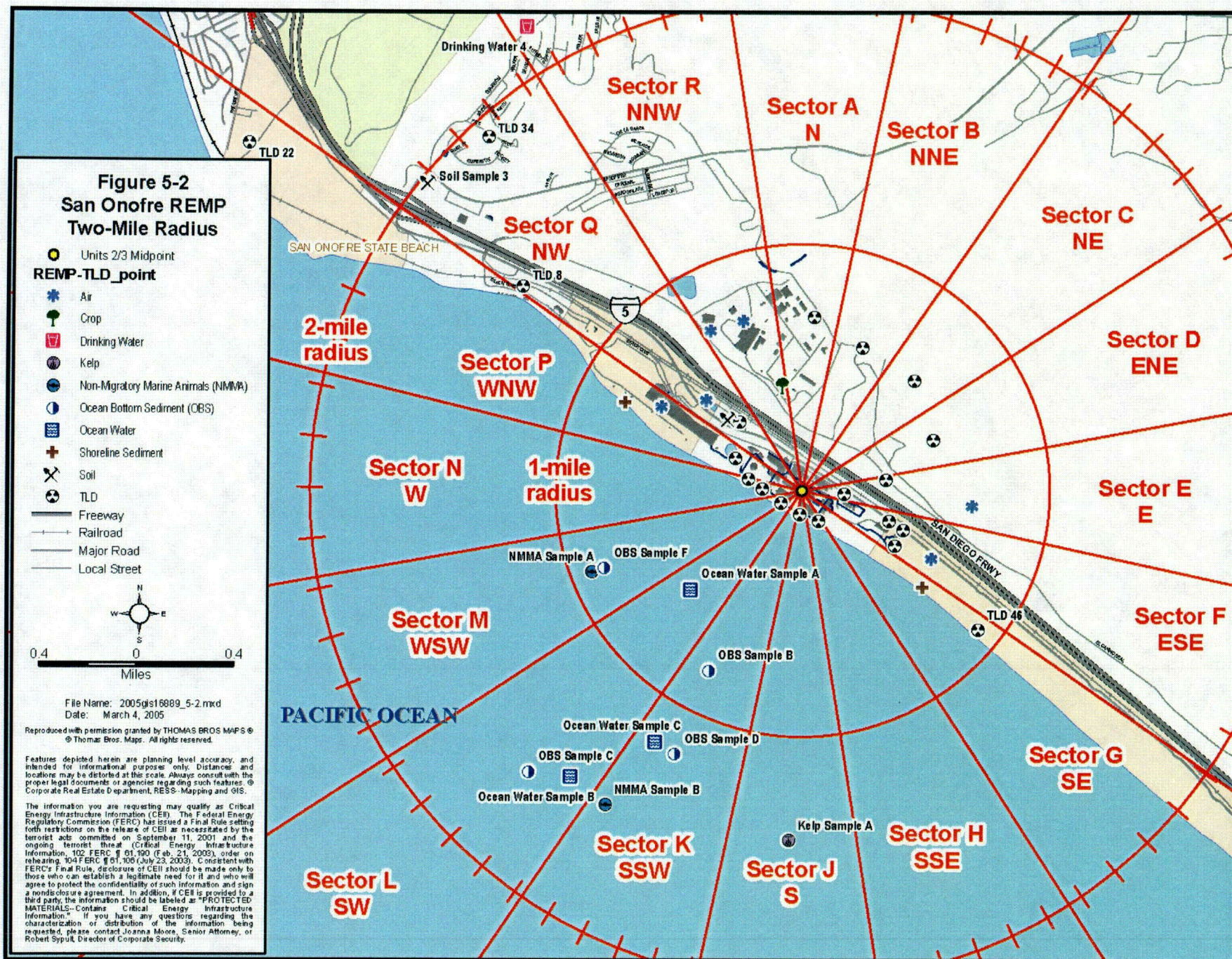
PIC Pressurized Ion Chamber

TABLE A-2

SECTOR AND DIRECTION DESIGNATION FOR REMP SAMPLE LOCATION MAP











DEGREES TRUE NORTH FROM SONGS 2 AND 3 MIDPOINT			NOMENCLATURE	
<u>Sector Limit</u>	<u>Center Line</u>	<u>Sector Limit</u>	<u>22.5° Sector</u>	<u>Direction</u>
348.75	0 & 360	11.25	A	N
11.25	22.5	33.75	B	NNE
33.75	45.0	56.25	C	NE
56.25	67.5	78.75	D	ENE
78.75	90.0	101.25	E	E
101.25	112.0	123.75	F	ESE
123.75	135.0	146.25	G	SE
146.25	157.0	168.75	H	SSE
168.75	180.0	191.25	J	S
191.25	202.5	213.75	K	SSW
213.75	225.0	236.25	L	SW
236.25	247.5	258.75	M	WSW
258.75	270.0	281.25	N	W
281.25	292.5	303.75	P	WNW
303.75	315.0	326.25	Q	NW
326.25	337.5	348.75	R	NNW








Units 2/3 Midpoint


REMP TLDs


-  Air
-  Crop
-  Drinking Water
-  Kelp
-  Non-Migratory Marine Animals (NIMMA)
-  Ocean Bottom Sediment (OBS)
-  Ocean Water
-  Shoreline Sediment
-  Soil
-  TLD

 Freeway

 Railroad

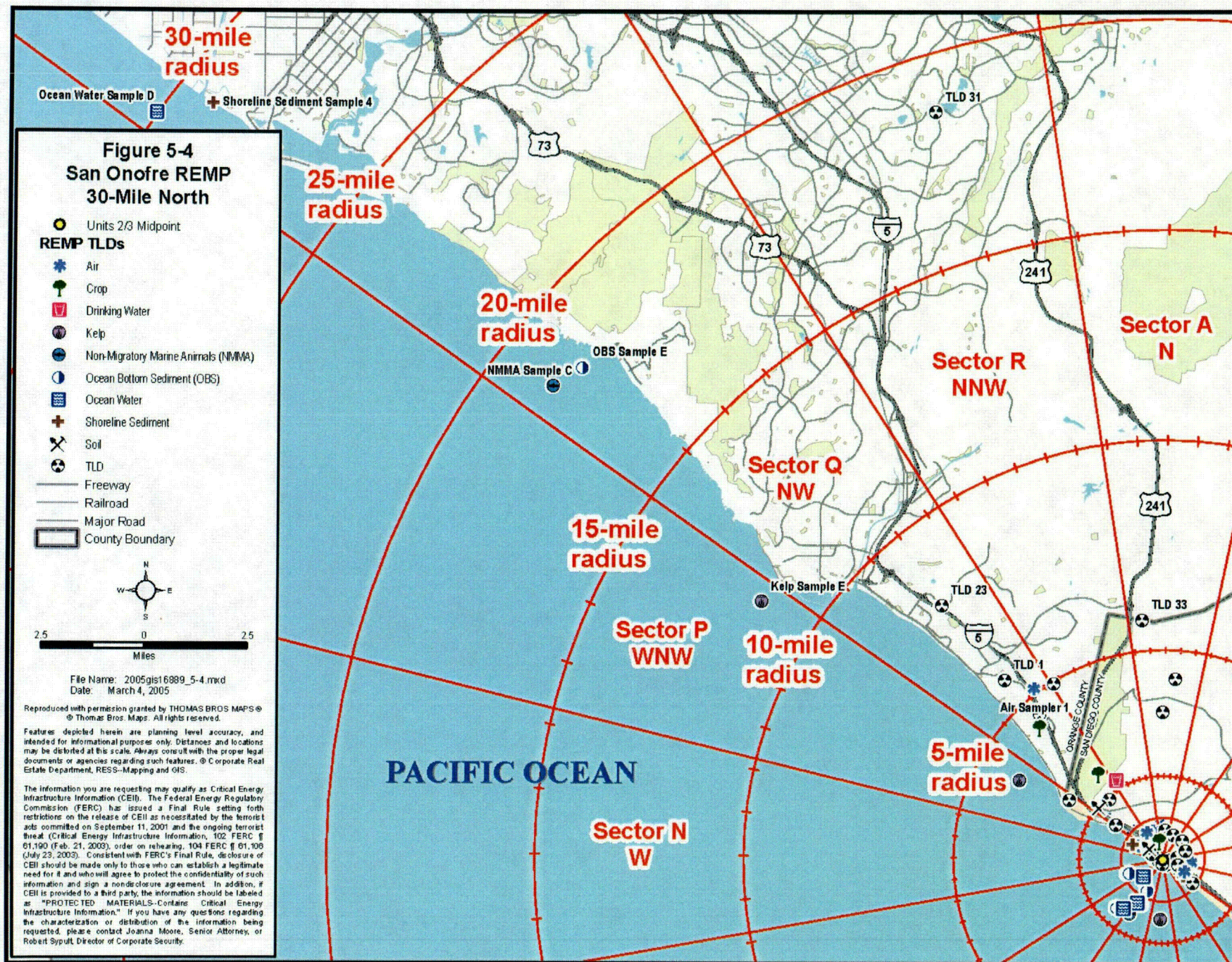
 Major Road

 Local Street

 County Boundary

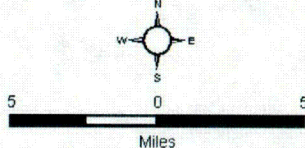
The information you are requesting may qualify as Critical Energy Infrastructure Information (CEII). The Federal Energy Regulatory Commission (FERC) has issued a Final Rule setting forth restrictions on the release of CEII as necessitated by the terrorist acts committed on September 11, 2001, and the ongoing terrorist threat to the United States. Pursuant to FERC's final rule, 61 FR 606 (Feb. 21, 2003), 61 FR 607 (Feb. 23, 2003), and 61 FR 6106 (July 23, 2003). Consistent with FERC's Final Rule, disclosure of CEII should be made only to those who can establish a legitimate need for such information, and to protect the confidentiality of such information and sign, a nondisclosure agreement. If CEII is provided to a third party, the information should be labeled as "PROTECTED MATERIALS-Contains Critical Energy Infrastructure Information." If you have any questions regarding the request or your distribution of the information being requested, please contact Robert Spurr, Esq., our Attorney, at Robert.Spurr@DirectorOfContractSecurity.com.





**Figure 5-5
San Onofre REMP
45-Mile South**

- Units 2/3 Midpoint
- REMP TLDs**
- ✱ Air
- 🌱 Crop
- 🏠 Drinking Water
- 🌊 Kelp
- 🐟 Non-Migratory Marine Animals (NMMA)
- 🌊 Ocean Bottom Sediment (OBS)
- 🌊 Ocean Water
- ✚ Shoreline Sediment
- ⚡ Soil
- ☢ TLD
- Freeway
- Railroad
- Major Road

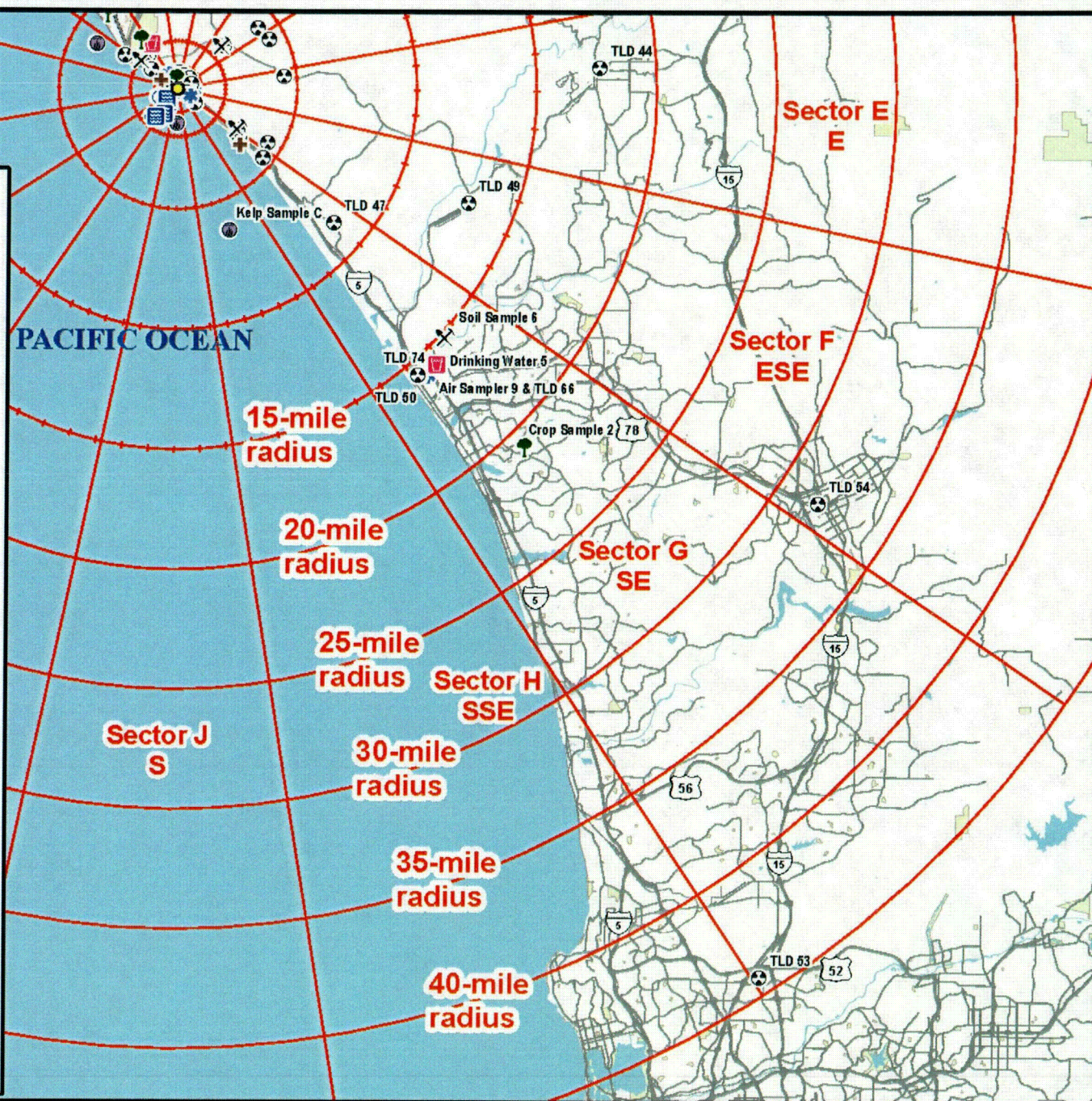


File Name: 2005gis16889_5-5.mxd
Date: March 4, 2005

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The information you are requesting may qualify as Critical Energy Infrastructure Information (CEII). The Federal Energy Regulatory Commission (FERC) has issued a Final Rule setting forth restrictions on the release of CEII as necessitated by the terrorist acts committed on September 11, 2001 and the ongoing terrorist threat (Critical Energy Infrastructure Information, 102 FERC ¶ 61,190 (Feb. 21, 2003), order on rehearing, 104 FERC ¶ 61,106 (July 23, 2003). Consistent with FERC's Final Rule, disclosure of CEII should be made only to those who can establish a legitimate need for it and who will agree to protect the confidentiality of such information and sign a nondisclosure agreement. In addition, if CEII is provided to a third party, the information should be labeled as "PROTECTED MATERIALS—Contains Critical Energy Infrastructure Information." If you have any questions regarding the characterization or distribution of the information being requested, please contact Joanna Moore, Senior Attorney, or Robert Spull, Director of Corporate Security.



APPENDIX B
SUMMARY, RESULTS, AND DISCUSSIONS
OF 2004 ENVIRONMENTAL DATA

SUMMARY

To assess the changes or trends in the radioactivity level in the environment over the past year, the data from January 2004 to December 2004 were evaluated. The 2004 REMP data were evaluated according to the criteria described in NUREG/CR-4007 and with the methodology described by Currie (1968).^{*} The REMP data above the critical level (1.64 times one sigma) for selected radionuclides, were reduced and tabulated in the Statistical Summary of REMP Data in accordance with the format specified in Reg. Guide 4.8. It should be noted that in an ideal database with the "true" value of each data point equal to zero, five (5)% of the values should be expected to be above the critical level. Excluding natural radionuclides (Be-7, K-40 and Th-228), approximately (5%) of the data listed in the Statistical Summary of REMP Data are above the critical level. Thus the 2004 SONGS REMP database, when examined in accordance with the Currie data reduction protocol, leads to the conclusion that SONGS had no statistically significant radiological environmental impact. A summary of the type and number of REMP samples obtained in 2004 appears in Table B-2.

As noted above, the SONGS REMP data base behaves substantially similar to a data base with values statistically indistinguishable from zero for station related isotopes. The exceptions, summarized in Table B-1, include eight (8) isotopically analyzed samples with station related activity reported above the *a posteriori* MDC. All sample values were significantly less than the NRC reporting levels. I-131 was detected in kelp and Cs-137 was detected in soil. These radionuclides have been detected in CONTROL as well as indicator locations in previous years. Cs-137 is commonly detected in environmental sediment samples because of fallout from weapons testing. Cs-137 has been intermittently detected in the indicator and in the CONTROL soil samples in past years and no correlation between Cs-137 level and proximity to the plant has been observed. The data strongly suggest that the low level Cs-137 in certain sediment samples is due to fallout and is not due to the operation of SONGS. I-131 is a medically administered radionuclide which is often detected in sewage plant outfalls, including those routed to the Pacific Ocean. I-131 has been detected in CONTROL and indicator kelp samples, suggesting that the source of the I-131 is external to SONGS. See Table B-1 for data. We conclude that SONGS had a negligible radiological environmental impact during 2004.

Historical trending of data near and below the detection limits is necessarily limited. The concentration of radionuclides in the environs of SONGS has trended downward since the early to mid 1980s. In the past three years only a few REMP analysis results have been above the detection limit. These isotopes are detected in CONTROL as well as indicator locations and there are known sources for these radionuclides external to SONGS. The overall trend of the REMP data at SONGS is *de minimis* levels of anthropogenic radioactivity with occasional samples showing radioactivity above the *a posteriori* MDC.

* L. Currie. 1968 "Limits for the Qualitative Detection and Quantitative Determination - Application to Radiochemistry," Analytical Chemistry, vol. 40 pp. 586-593

RESULTS AND DISCUSSIONS OF 2004 ENVIRONMENTAL DATA

A. *Direct Radiation*

The purpose of this program element was to measure the quarterly environmental gamma radiation in the vicinity of SONGS. To accomplish this task, calcium sulfate (CaSO_4) thermoluminescent dosimeters (TLDs) were placed at a minimum of 30 indicator and CONTROL locations. They were collected and analyzed quarterly in accordance with ANSI-N545 standards. TLDs within five miles of SONGS were considered indicator locations. TLDs located greater than five miles from SONGS were considered CONTROL locations. The indicator locations are selected as inner and outer rings for all three Units as required by Unit 1 and Units 2/3 Offsite Dose Calculation Manuals (ODCMs). Additional TLDs are placed at locations of interest such as schools and hospitals.

Six laboratory CONTROL TLDs were analyzed quarterly. TLD numbers 17, 18, and 60 are used for background dose normalization. TLDs #A and #B are used to compensate for transit dose. A fader TLD is used to compensate for the time and temperature dependent "fade" associated with this type of dosimeter.

After the samples were analyzed, the measured doses were corrected for pre and post field exposure times. The average routine indicator location dose was 16.10 mR with a range of 9.80 to 23.64 mR. The average CONTROL location dose was 15.12 mR with a range of 11.53 to 19.70 mR. The routine 2004 REMP TLD data has been grouped into four categories based on distance from SONGS for the purposes of trending any correlation between distance from SONGS and total annual dose.

2004 REMP TLD data (Average Dose vs. Distance from SONGS) Average Quarterly Dose in mR

TLDs ≤ 0.5 miles from SONGS	17.75
TLDs > 0.5 miles AND ≤ 1.0 mile from SONGS	14.31
TLDs > 1.0 mile AND ≤ 5.0 miles from SONGS	15.97
TLDs > 5 miles from SONGS (CONTROL TLDs)	15.12

These data indicate no correlation between total dose and distance from SONGS. The variations in the average dose is approximately equal to the median two sigma variation of measurement (1.8 mR per quarter). Statistically, the CONTROL and indicator doses are the same value. The routine indicator location at the Southeast Site Boundary (location # 13, at 0.4 miles ESE of Units 2/3 midpoint) had the highest TLD average in 2004. The operation of SONGS had no impact on the environment as measured by this sample medium.

Figures 2A & 2B compare environmental radiation levels of indicator and CONTROL locations for the operational year 2004 and for previous years. These figures show the close correlation between the CONTROL and indicator location TLD dose data.

Nonroutine Direct Radiation Samples

Duplicate QC TLDs were installed adjacent to TLD #66 and TLD #67. Refer to Appendix C for results. These TLDs were not required by the ODCM and are not included in the Statistical Summary of REMP Data.

ISFSI Direct Radiation Samples

ISFSI (Independent Spent Fuel Storage Installation) TLDs were deployed in the vicinity of the ISFSI. Data from these TLDs have not been included in the statistical summary of REMP data since these TLDs are not required by the ODCM. The ISFSI data are listed and discussed in Appendix J.

B. Airborne Particulate, Iodine, and Composite Isotopic Analyses

Air particulate samples were collected on a weekly basis from eight indicator locations and from one CONTROL location. The samples were analyzed for gross beta activity, I-131, and composited quarterly for gamma isotopic analysis. Sample locations were selected according to the requirements of the Unit 1 and Units 2/3 Offsite Dose Calculation Manuals.

Gross beta analysis is a measure of total radioactivity of beta-emitting radionuclides in a sample. Beta radiation is emitted by many radionuclides, but beta decay gives a continuous energy spectrum rather than the discrete lines or peaks associated with gamma radiation. Gross beta measurements only indicate whether the sample contains normal or abnormal concentrations of beta-emitting radionuclides and does not identify specific radionuclides. Gross beta measurement data serves as a screening tool to determine if further analysis is required.

Nearly all gross beta activity analysis results were above the *a posteriori* MDC. The concentration of gross beta activity in the samples collected from the indicator locations ranged from 0.0065 to 0.0973 pCi/m³, averaging 0.0259 pCi/m³ of air. The concentrations of gross beta activity in the samples from the CONTROL location ranged from 0.0086 to 0.0805 pCi/m³, averaging 0.0245 pCi/m³ of air. Figure 3D shows the variation in gross beta activity level in 2004 at different locations. These graphs show a close correlation between the indicator and CONTROL location data.

Per the requirements of Unit 1 and Units 2/3 ODCM, Section 5, Table 5.1, an assessment was performed to determine whether the gross beta activity of the indicators exceeded 10 times the background (CONTROL location #15). The results showed that indicator locations maximum gross beta activity in air in 2004 was 0.0973 pCi/m³ and the 2003 CONTROL location average was 0.0237 pCi/m³. No action was taken since no indicator location value exceeded ten times the annual average gross beta activity of the CONTROL location data from the previous year.

All samples analyzed for I-131 were less than the *a posteriori* MDC and all I-131 samples were less than the *a priori* lower limit of detection (LLD). The airborne indicator and CONTROL I-131 REMP samples taken in 2004 at SONGS were statistically indistinguishable from zero.

No samples yielded station related isotopic results confirmed above the *a posteriori* MDC. Quarterly composite gamma spectral analysis analyses yielded only naturally occurring beryllium-7 (Be-7) above the *a posteriori* MDC.

We conclude that the operation of SONGS had no impact on the environment as measured by this sample medium.

C. Ocean Water

Monthly ocean water samples were collected from indicator locations in the vicinity of each station discharge and from the CONTROL location at Newport Beach. The samples were analyzed for naturally-occurring and SONGS-related gamma-emitting radionuclides. Quarterly composite ocean water samples were analyzed for tritium according to ODCM requirements. Naturally occurring potassium-40 (K-40) was detected in all ocean water samples obtained in 2004. No SONGS related radionuclides were detected in this sample medium during 2004.

Four non-routine ocean water samples were obtained from two locations, Unit 2 outfall conduit and Unit 3 outfall conduit. The conduit samples were collected to measure the radiological environmental effect potentially resulting from the minor conduit leakage

Throughout 2004, only naturally occurring K-40 was detected in the monthly gamma spectral analyses of ocean water. No station related radionuclides were detected above the *a posteriori* MDC in this sample type during 2004.

Excluding K-40, the ocean water gamma isotopic database is statistically indistinguishable from a database with zero activity.

The data indicate that the operation of SONGS had no impact on the environment as measured by this sample medium.

D. Drinking Water

In 2004, drinking water samples were collected on a monthly basis from one indicator location and from the Oceanside CONTROL location. Samples were analyzed for tritium, gross beta, and 26 naturally-occurring and SONGS-related gamma emitting radionuclides. There is no drinking water pathway for liquid effluent at SONGS.

No station related radionuclides were detected in drinking water during 2004. Excluding gross beta, the drinking water gamma isotopic database is statistically indistinguishable from a database with zero activity. The operation of SONGS had no impact on this sample medium.

E. Shoreline Sediment (Beach Sand)

Beach sand was collected semiannually in 2004 from three indicator locations and from a CONTROL location situated in Newport Beach. After collection, the samples were analyzed for 26 different plant-related and naturally-occurring radionuclides. Only naturally occurring K-40 and thorium-228 (Th-228) were detected. No plant related radionuclides were reported above the *a posteriori* MDC. The operation of SONGS had no impact on the environment as measured by this sample medium.

F. Ocean Bottom Sediments

Ocean bottom sediments were collected in the vicinity of each of the three SONGS discharge locations and at the Newport Beach CONTROL location. The samples were analyzed by gamma-spectral analysis for 26 naturally-occurring and station-related radionuclides. K-40 and Th-228 were detected in all ocean bottom sediment samples collected during 2004.

Four non-routine ocean bottom sediment samples were obtained from two locations, Unit 2 outfall conduit and Unit 3 outfall conduit. The conduit samples were collected to measure the radiological environmental effect potentially resulting from the minor conduit leakage. During 2004, all the conduit sample analysis results were below the MDC for station related radionuclides.

We conclude that the operation of SONGS had no impact on the environment as measured by this sample medium.

G. Non-Migratory Marine Species (Flesh)

Species of adult fish, crustacea and mollusks, were collected on a semi annual basis at the SONGS Unit 1 outfall, the SONGS Units 2/3 outfall and from Laguna Beach CONTROL location. The flesh portion of each sample type was analyzed for 26 gamma-emitting station-related and naturally occurring radionuclides. The results were subsequently reported to Edison in terms of wet sample weights. Because results based on a wet sample weight are most useful for calculating doses, the results of sample analyses are summarized in terms of "as received" wet weights.

No plant related radionuclides were confirmed above the *a posteriori* MDC.

Naturally-occurring K-40 was detected in most marine species samples collected during 2004. No plant related isotopes were reported above the *a posteriori* MDC. The operation of SONGS had no impact on the environment as measured by this sample medium. The potential dose to members of the public from consumption of marine species near SONGS is negligible.

H. Local Crops

Fleshy and leafy crops were collected semiannually in 2004 from the SONGS garden and from CONTROL locations near Oceanside. The crop samples were analyzed quantitatively for 26 gamma-emitting radionuclides, both natural and plant related. Only naturally occurring radionuclides were detected. SONGS had no measurable impact on this sample medium.

I. Soil

To determine if there is evidence of a build-up of radionuclides in the land near SONGS, indicator soil samples were collected from the East Site Boundary (Former Visitor's center), Old Route 101, Basilone Road, and Camp San Onofre. A CONTROL sample was obtained from Oceanside. Surface soil was collected from all indicator and CONTROL locations at the depth

of 3 inches. The sampling protocol is consistent with the procedure described in HASL-300. Soil sampling is not required by ODCMs.

Soil samples were analyzed for 26 naturally-occurring and SONGS-related gamma-emitting radionuclides using gamma spectral analysis. All 2004 soil samples yielded naturally occurring K-40 and Th-228. Cs-137, above the *a posteriori* MDC, was detected in two indicator samples. Cs-137 is often detected in environmental sediment samples and the presence of Cs-137 is most likely related to nuclear weapons testing fallout.

Cs-137 and strontium-90 (Sr-90) were detected in soil profile analyses conducted in previous years. These radionuclides are mostly due to the nuclear weapons testing fallout depositing on soil and retention of these radionuclides due to their long half lives. The presence of Cs-137 in the CONTROL location in previous years supports the conclusion that the major source of this radionuclide is fallout deposition. Refer to the 1993 AREOR for a more detailed discussion of Cs-137 and other potentially SONGS related isotopes detected in soil. The Cs-137 activity can be attributed to atmospheric nuclear weapons tests and not SONGS operations. During 2004, the operation of SONGS had no impact on the environment as measured by this sample medium.

J. Kelp Sampling

Kelp was collected during April and October 2004 from the San Onofre kelp beds, San Mateo kelp beds, Barn kelp beds, and from the Salt Creek CONTROL location. Upon collection, the samples were analyzed by gamma-spectral analysis for 26 different naturally-occurring and Station-related radionuclides. The radionuclides detected in 2004 were K-40 and I-131. K-40 is naturally occurring and not related to the operation of SONGS. I-131 was detected in one CONTROL samples and five indicator samples. I-131 is often detected in Sewage Plant outfalls, including those routed to the Pacific Ocean.

I-131 has been detected at indicator and CONTROL locations in previous years. The northern CONTROL location is too far away and in the predominantly upstream current direction for the I-131 activity to be attributable to SONGS. The presence of low levels of I-131 in both the indicator and the control locations suggest a source which is external to SONGS. The I-131 activity in kelp data, graphically presented in Figure 4, shows a relatively close correlation between indicator and control locations over a 25 year period - further supporting the assessment that the likely source for this radionuclide is external to SONGS.

TABLE B-1

Summary of SONGS related Gamma Isotopic Analyses confirmed above MDC

Sample Media & location	Radionuclide	Sample Value	MDC (<i>a posteriori</i>)
Aquatic Kelp San Onofre Kelp Bed Station A 15APR04	I-131	(90 ± 25) E-3 pCi/g	30 E-3 pCi/g
Aquatic Kelp San Mateo Kelp Bed Station B 15ARP04	I-131	(43 ± 24) E-3 pCi/g	34 E-3 pCi/g
Aquatic Kelp San Mateo Kelp Bed Station B 18OCT04	I-131	(42 ± 21) E-3 pCi/g	32 E-3 pCi/g
Aquatic Kelp Barn Kelp Bed Station C 15APR04	I-131	(75 ± 26) E-3 pCi/g	31 E-3 pCi/g
Aquatic Kelp Barn Kelp Bed Station C 18OCT04	I-131	(61 ± 24) E-3 pCi/g	34 E-3 pCi/g
Aquatic Kelp Salt Creek CONTROL location Station E 15APR04	I-131	(72 ± 20) E-3 pCi/g	25 E-3 pCi/g
Soil Camp San Onofre Location # 1 27SEP04	Cs-137	(32 ± 14) E-3 pCi/g	21 E-3 pCi/g
Soil Old Route 101 Location #2 27SEP04	Cs-137	(164 ± 21) E-3 pCi/g	22 E-3 pCi/g

TABLE B-2
REMP SAMPLE ANALYSIS SUMMARY FOR 2004

Medium	Analysis Type	Sampling Frequency	# of Locations	Total # of Analysis in 2004
Direct Radiation	Dosimetry	Quarterly	49	196
Airborne Particulates	Gross Beta	Weekly	9	467
Charcoal Cartridge	I-131	Weekly	9	467
Airborne Particulates	Ge (Li) Scan	Quarterly	9	36
Ocean Water	Ge (Li) Scan	Monthly	4	48
Ocean Water	H-3	Quarterly	4	16
Ocean Water Conduit	Ge (Li) Scan	Semi-Annually	2	4
Drinking Water, Unfiltered	Ge (Li) Scan	Monthly	2	24
	H-3		2	24
	Gross Beta		2	24
Shoreline Sediment	Ge (Li) Scan	Semi-Annually	4	8
Ocean Bottom Sediment	Ge (Li) Scan	Semi-Annually	7	14
Marine Species, Flesh	Ge (Li) Scan	Semi-Annually	3	24
Crops	Ge (Li) Scan	Semi-Annually	2	8
Kelp	Ge (Li) Scan	Semi-Annually	4	8
Soil	Ge (Li) Scan	Annually	5	5

STATISTICAL SUMMARY OF REMP DATA FOR 2004

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on: 03/10/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period: 1/1/2004 to 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)		
Quarterly Gamma Exposure – Table 1A (mR/std quarter)							
	Gamma	196	5	16.10 (152/152) (9.8 – 23.64)	South Yard Facility, 0-4, ESE	22.34 (4/4) (20.67 – 23.64)	15.12 (44/44) (11.53 – 19.70)

- (1) Indicator location TLDs include all REMP TLDs 5.0 miles or closer to SONGS 2/3 midpoint.
- (2) CONTROL location TLDs include all REMP TLDs more than 5.0 miles from SONGS 2/3 midpoint.
- (3) Indicator location TLD data excludes QC TLDs, transit dose TLDs, and ISFSI TLDs.

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
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Weekly Airborne Particulates Gross
Beta Activity - Table 2 (pCi/cu.m)

Gross Beta	467	0.01	0.0259 (0.0065 - 0.0973)	(415/415)	Marine Corp Base (Camp Pendleton East) 0.7 Mi E	0.0268 (0.0084 - 0.0973)	(51/51)	0.0245 (0.0086 - 0.0805)	(52/52)	52
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Nonroutine reported analysis results include data from Air Sampler # 7, AWS roof, which is well within the exclusion area boundary and is not necessary to comply with the OCDM requirements.

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements	
				Name, Distance and Direction	Mean (Range)			
Weekly Radiiodine I-131 Activity - Table 3 (pCi/cu m)								
I-131	467	0.07	0.0173 (0.0110 - 0.0240)	(26/415) Mesa Medical Facility 0.7 Mi. NNW	0.0190 (0.0190 - 0.0190)	(1/52) (0.0130 - 0.0230)	0.0158 (4/52)	52

Nonroutine reported analysis results include data from Air Sampler # 7, AWS roof, which is well within the exclusion area boundary and is not necessary to comply with the OCDM requirements.

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/12/05

**DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA**

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Quarterly Comp. Airborne Particulates Gamma - Table 4A (pCi/cu m)							
Be-7	36	0.04	0.12 (32/32) (0.0870 - 0.16)	Mesa EOF 0.7 Mi. NNW	0.13 (4/4) (0.11 - 0.15)	0.11 (4/4) (0.0900 - 0.13)	4
Cs-134	36	0.05	< LLD (0/32)	Oceanside City Hall (CONTROL) 15.6 Mi. SE	7.40E-4 (1/4) (7.40E-4 - 7.40E-4)	7.40E-4 (1/4) (7.40E-4 - 7.40E-4)	4
Cs-137	36	0.06	6.10E-4 (1/32) (6.10E-4 - 6.10E-4)	AWS Roof Parking 0.18 Mi. NW	6.10E-4 (1/4) (6.10E-4 - 6.10E-4)	< LLD (0/4)	4

Nonroutine reported analysis results include data from Air Sampler # 7, AWS roof, which is well within the exclusion area boundary and is not necessary to comply with the OCDM requirements.

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Monthly Ocean Water Gamma Spectral Analysis - Table 5 (pCi/l)							
Ra-140	52	15	3.70 (3.70 - 3.70)	(1/40)	(A) Station Discharge Outfall-Unit 1 0.6 Mi. SW	3.70 (3.70 - 3.70)	4
Co-58	52	15	<LLD	(0/40)	---	(0/2)	4
Co-60	52	15	2.85 (2.10 - 3.60)	(2/40)	(C) Outfall - Unit 3 1.2 Mi. SSW	3.60 (3.60 - 3.60)	4
Cs-134	52	15	3.70 (3.70 - 3.70)	(1/40)	(C) Outfall - Unit 3 1.2 Mi. SSW	3.70 (3.70 - 3.70)	4
Cs-137	52	18	<LLD	(0/40)	---	(0/2)	4
Fe-59	52	30	8.93 (5.50 - 8.00)	(3/40)	(D) Newport Beach 30 Mi. NW	8.10 (8.10 - 8.10)	4
I-131	52	15	<LLD	(0/40)	---	(0/2)	4
K-40	52	150	314.75 (205.00 - 400.00)	(40/40)	(D) Newport Beach 30 Mi. NW	350.83 (289.00 - 407.00)	4
La-140	52	15	<LLD	(0/40)	---	(0/2)	4
Mn-54	52	15	1.80 (1.80 - 1.80)	(1/40)	(D) Newport Beach 30 Mi. NW	2.07 (1.60 - 2.30)	4
Nb-95	52	15	3.10 (3.10 - 3.10)	(1/40)	(A) Station Discharge Outfall-Unit 1 0.6 Mi. SW	3.10 (3.10 - 3.10)	4

Nonroutine reported analysis results include Sample # 51 (Unit 2 Conduit) and Sample # 52 (Unit 3 Conduit). The nonroutine samples were collected twice per year. All other samples were collected monthly.

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/12/05

**DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA**

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)		

Monthly Ocean Water Gamma
Spectral Analysis - Table 5 (pCi/l)

Zn-65	52	30	< LLD	(0/40)	(D) Newport Beach 30 Mi. NW	5.60 (5.60 - 5.60)	(1/12)	5.60 (5.60 - 5.60)	(1/12)	4
Zn-95	52	15	5.50 (4.40 - 6.60)	(2/40)	(C) Outfall - Unit 3 1.2 Mi. SSW	5.50 (4.40 - 6.60)	(2/12)	< LLD	(0/12)	4

Nonroutine reported analysis results include Sample # 51 (Unit 2 Conduit) and Sample # 52 (Unit 3 Conduit). The nonroutine samples were collected twice per year. All other samples were collected monthly.

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)		

Quarterly Composite Ocean Water
Tritium Activity - Table 7 (pCi/l)

H-3	16	2000	< LLD	(0/12)	—	(0/4)	< LLD	(0/4)	0
-----	----	------	-------	--------	---	-------	-------	-------	---

Nonroutine ocean water samples # 51 and # 52 were not analyzed for tritium.

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/12/05

**DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA**

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)		Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)			
Monthly Drinking Water Analysis - Table 9A (pCi/l)								
Ba-140	24	15	< LLD (0/12)	---	(0/12)	< LLD	(0/12)	0
Co-58	24	15	< LLD (0/12)	---	(0/12)	< LLD	(0/12)	0
Co-60	24	15	< LLD (0/12)	Oceanside (Control) 15.6 Mi. SE	1.80 (1.80 - 1.80)	1.80 (1.80 - 1.80)	(1/12)	0
Cs-134	24	15	4.00 (4.00 - 4.00)	Camp Pendleton 2.2 Mi. NNW	4.00 (4.00 - 4.00)	2.20 (2.10 - 2.30)	(2/12)	0
Cs-137	24	18	< LLD (0/12)	---	(0/12)	< LLD	(0/12)	0
Fe-59	24	30	6.10 (6.10 - 6.10)	Camp Pendleton 2.2 Mi. NNW	6.10 (6.10 - 6.10)	< LLD	(0/12)	0
Gross Beta	24	4	3.95 (1.90 - 5.60)	Oceanside (Control) 15.6 Mi. SE	5.88 (2.90 - 8.50)	5.88 (2.90 - 8.50)	(12/12)	0
H-3	24	2000	< LLD (0/12)	Oceanside (Control) 15.6 Mi. SE	1100.00 (1100.00 - 1100.00)	1100.00 (1100.00 - 1100.00)	(1/12)	0
I-131	24	15	4.70 (3.60 - 5.80)	Camp Pendleton 2.2 Mi. NNW	4.70 (3.60 - 5.80)	4.70 (3.90 - 5.50)	(2/12)	0
K-40	24	150	< LLD (0/12)	---	(0/12)	< LLD	(0/12)	0
La-140	24	15	< LLD (0/12)	---	(0/12)	< LLD	(0/12)	0

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)		Number of Nonroutine Reported Measurements		
				Name, Distance and Direction	Mean (Range)					
Monthly Drinking Water Analysis - Table 9A (pCi/l)										
	Mn-54	24	15	2.00 (2.00 - 2.00)	(1/12)	Oceanside (Control) 15.6 Mi. SE	2.00 (1.90 - 2.10)	2.00 (1.90 - 2.10)	(2/12)	0
	Nb-95	24	15	4.80 (4.80 - 4.80)	(1/12)	Camp Pendleton 2.2 Mi. NNW	4.80 (4.80 - 4.80)	3.80 (3.80 - 3.80)	(1/12)	0
	Zn-65	24	30	< LLD	(0/12)	Oceanside (Control) 15.6 Mi. SE	13.00 (13.00 - 13.00)	13.00 (13.00 - 13.00)	(1/12)	0
	Zr-95	24	15	< LLD	(0/12)	Oceanside (Control) 15.6 Mi. SE	7.50 (7.50 - 7.50)	7.50 (7.50 - 7.50)	(1/12)	0

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/12/05

**DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA**

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)		Location with Highest Annual Mean		Control Locations Mean (Range)		Number of Nonroutine Reported Measurements		
					Name, Distance and Direction	Mean (Range)					
Semi-annual Shoreline Sediment Gamma Spectral Analysis - Table 10 (pCi/g)											
	Cs-134	8	0.15	< LLD	(0/6)		----	(0/2)	< LLD	(0/2)	0
	Cs-137	8	0.18	< LLD	(0/6)		----	(0/2)	< LLD	(0/2)	0
	K-40	8	1.5	11.40 (7.95 - 14.79)	(6/6)	Newport Beach North En- 29.2 Mi. NW	17.85 (16.66 - 19.04)	(2/2)	17.85 (16.66 - 19.04)	(2/2)	0
	Th-228	8	0.4	0.43 (0.16 - 1.09)	(6/6)	San Onofre State Beach 0.6 Mi. SE	0.65 (0.22 - 1.09)	(2/2)	0.43 (0.38 - 0.48)	(2/2)	0

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Semi-annual Ocean Bottom Sediment Gamma Spectral Analysis - Table 11 (pCi/g)							
Cs-134	14	0.15	< LLD (0/12)	---	(0/2)	< LLD (0/2)	4
Cs-137	14	0.18	0.0158 (0.0100 - 0.0210) (5/12)	(C) Unit 2 Outfall 1.6 Mi. SW	0.0210 (0.0210 - 0.0210) (1/2)	< LLD (0/2)	4
K-40	14	1.5	15.82 (12.92 - 18.05) (12/12)	(E) Laguna Beach 18.2 Mi. NW	17.52 (16.82 - 18.23) (2/2)	17.52 (16.82 - 18.23) (2/2)	4
Th-228	14	0.4	0.45 (0.16 - 0.66) (11/12)	(C) Unit 2 Outfall 1.6 Mi. SW	0.65 (0.65 - 0.66) (2/2)	0.36 (0.32 - 0.40) (2/2)	4

Nonroutine reported analysis results include Sample # 51 (Unit 2 Conduit) and Sample # 52 (Unit 3 Conduit). The nonroutine samples were collected twice per year. All other samples were collected monthly.

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)			Location with Highest Annual Mean			Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
						Name, Distance and Direction	Mean (Range)			
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)										
Bay Mussel	Co-58	5	0.13	0.0420 (0.0420 - 0.0420)	(1/3)	(A) Unit 1 Outfall 0.9 Mi. WSW	0.0420 (0.0420 - 0.0420)	(1/2)	< LLD (0/2)	0
Bay Mussel	Co-60	5	0.13	< LLD	(0/3)		---	(0/1)	< LLD (0/2)	0
Bay Mussel	Cs-134	5	0.13	< LLD	(0/3)		---	(0/1)	< LLD (0/2)	0
Bay Mussel	Cs-137	5	0.15	< LLD	(0/3)		---	(0/2)	< LLD (0/2)	0
Bay Mussel	Fe-59	5	0.26	< LLD	(0/3)		---	(0/2)	< LLD (0/2)	0
Bay Mussel	K-40	5	1.4	2.04 (1.30 - 2.90)	(3/3)	(A) Unit 1 Outfall 0.9 Mi. WSW	2.10 (1.30 - 2.90)	(2/2)	1.97 (1.88 - 2.06)	(2/2) 0
Bay Mussel	Mn-54	5	0.13	< LLD	(0/3)		---	(0/2)	< LLD (0/2)	0
Bay Mussel	Zn-65	5	0.26	< LLD	(0/3)		---	(0/2)	< LLD (0/2)	0
Black Perch	Co-58	3	0.13	< LLD	(0/3)		---	(0/2)	< LLD (0/0)	0
Black Perch	Co-60	3	0.13	< LLD	(0/3)		---	(0/2)	< LLD (0/0)	0
Black Perch	Cs-134	3	0.13	< LLD	(0/3)		---	(0/2)	< LLD (0/0)	0

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/12/05

**DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA**

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)							
Black Perch	Cs-137 3	0.15	< LLD (0/3)	---	(0/1)	< LLD (0/0)	0
Black Perch	Fe-59 3	0.26	0.0900 (1/3) (0.0900 - 0.0900)	(A) Unit 1 Outfall 0.9 Mi. WSW	0.0900 (1/2) (0.0900 - 0.0900)	< LLD (0/0)	0
Black Perch	K-40 3	1.4	3.14 (3/3) (2.90 - 3.63)	(B) Units 2 and 3 Outfall 1.5 Mi. SSW	3.63 (1/1) (3.63 - 3.63)	< LLD (0/0)	0
Black Perch	Mn-54 3	0.13	< LLD (0/3)	---	(0/1)	< LLD (0/0)	0
Black Perch	Zn-65 3	0.26	< LLD (0/3)	---	(0/1)	< LLD (0/0)	0
Kelp Bass	Co-58 2	0.13	< LLD (0/1)	---	(0/1)	< LLD (0/1)	0
Kelp Bass	Co-60 2	0.13	< LLD (0/1)	---	(0/1)	< LLD (0/1)	0
Kelp Bass	Cs-134 2	0.13	< LLD (0/1)	---	(0/1)	< LLD (0/1)	0
Kelp Bass	Cs-137 2	0.15	< LLD (0/1)	(C) Laguna Beach 18.2 Mi. NW	0.0240 (1/1) (0.0240 - 0.0240)	0.0240 (1/1) (0.0240 - 0.0240)	0
Kelp Bass	Fe-59 2	0.26	< LLD (0/1)	---	(0/1)	< LLD (0/1)	0
Kelp Bass	K-40 2	1.4	3.32 (1/1) (3.32 - 3.32)	(C) Laguna Beach 18.2 Mi. NW	3.58 (1/1) (3.58 - 3.58)	3.58 (1/1) (3.58 - 3.58)	0

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)							
Kelp Bass	Mn-54 2	0.13	< LLD (0/1)	---	(0/1)	< LLD (0/1)	0
Kelp Bass	Zn-65 2	0.26	< LLD (0/1)	---	(0/1)	< LLD (0/1)	0
Keyhole Limpet	Co-58 1	0.13	< LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Keyhole Limpet	Co-60 1	0.13	< LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Keyhole Limpet	Cs-134 1	0.13	< LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Keyhole Limpet	Cs-137 1	0.15	< LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Keyhole Limpet	Fe-59 1	0.26	< LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Keyhole Limpet	K-40 1	1.4	1.18 (1/1) (1.18 - 1.18)	(B) Units 2 and 3 Outfall 1.5 Mi. SSW	1.18 (1/1) (1.18 - 1.18)	< LLD (0/0)	0
Keyhole Limpet	Mn-54 1	0.13	< LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Keyhole Limpet	Zn-65 1	0.26	< LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Lobster	Co-58 1	0.13	< LLD (0/0)	---	(0/1)	< LLD (0/1)	0

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements			
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)										
Lobster	Co-60	1	0.13 < LLD	(0/0)	---	(0/1)	< LLD	(0/1)	0	
Lobster	Cs-134	1	0.13 < LLD	(0/0)	---	(0/1)	< LLD	(0/1)	0	
Lobster	Cs-137	1	0.15 < LLD	(0/0)	---	(0/1)	< LLD	(0/1)	0	
Lobster	Fe-59	1	0.26 < LLD	(0/0)	---	(0/1)	< LLD	(0/1)	0	
Lobster	K-40	1	1.4 < LLD	(0/0)	(C) Laguna Beach 18.2 Mi. NW	3.62 (3.62 - 3.62)	(1/1)	3.62 (3.62 - 3.62)	(1/1)	0
Lobster	Mn-54	1	0.13 < LLD	(0/0)	---	(0/1)	< LLD	(0/1)	0	
Lobster	Zn-65	1	0.26 < LLD	(0/0)	---	(0/1)	< LLD	(0/1)	0	
Opal Eye	Co-58	1	0.13 < LLD	(0/1)	---	(0/1)	< LLD	(0/0)	0	
Opal Eye	Co-60	1	0.13 < LLD	(0/1)	---	(0/1)	< LLD	(0/0)	0	
Opal Eye	Cs-134	1	0.13 < LLD	(0/1)	---	(0/1)	< LLD	(0/0)	0	
Opal Eye	Cs-137	1	0.15 < LLD	(0/1)	---	(0/1)	< LLD	(0/0)	0	

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed		Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)		Location with Highest Annual Mean		Control Locations Mean (Range)		Number of Nonroutine Reported Measurements	
						Name, Distance and Direction	Mean (Range)				
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)											
Opal Eye	Fe-59	1	0.26	< LLD	(0/1)		----	(0/1)	< LLD	(0/0)	0
Opal Eye	K-40	1	1.4	2.48 (2.48 - 2.48)	(1/1)	(B) Units 2 and 3 Outfall 1.5 Mi. SSW	2.48 (2.48 - 2.48)	(1/1)	< LLD	(0/0)	0
Opal Eye	Mn-54	1	0.13	< LLD	(0/1)		---	(0/1)	< LLD	(0/0)	0
Opal Eye	Zn-65	1	0.26	< LLD	(0/1)		---	(0/1)	< LLD	(0/0)	0
Sheephead	Co-58	4	0.13	< LLD	(0/2)		---	(0/2)	< LLD	(0/2)	0
Sheephead	Co-60	4	0.13	< LLD	(0/2)		----	(0/2)	< LLD	(0/2)	0
Sheephead	Cs-134	4	0.13	< LLD	(0/2)		----	(0/2)	< LLD	(0/2)	0
Sheephead	Cs-137	4	0.15	< LLD	(0/2)		---	(0/2)	< LLD	(0/2)	0
Sheephead	Fe-59	4	0.26	< LLD	(0/2)		---	(0/2)	< LLD	(0/2)	0
Sheephead	K-40	4	1.4	3.08 (2.58 - 3.60)	(2/2)	(A) Unit 1 Outfall 0.9 Mi. WSW	3.08 (2.58 - 3.60)	(2/2)	2.79 (2.66 - 2.91)	(2/2)	0
Sheephead	Mn-54	4	0.13	< LLD	(0/2)		---	(0/2)	< LLD	(0/2)	0

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/12/05

**DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA**

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)							
Sheephead	Zn-65 4	0.26	<LLD (0/2)	—	(0/2)	<LLD (0/2)	0
Sand Bass	Co-58 2	0.13	<LLD (0/1)	—	(0/1)	<LLD (0/1)	0
Sand Bass	Co-60 2	0.13	<LLD (0/1)	—	(0/1)	<LLD (0/1)	0
Sand Bass	Cs-134 2	0.13	<LLD (0/1)	—	(0/1)	<LLD (0/1)	0
Sand Bass	Cs-137 2	0.15	<LLD (0/1)	—	(0/1)	<LLD (0/1)	0
Sand Bass	Fe-59 2	0.26	<LLD (0/1)	—	(0/1)	<LLD (0/1)	0
Sand Bass	K-40 2	1.4 2.60 (2.60 - 2.60)	(1/1)	(C) Laguna Beach 18.2 Mi. NW	3.08 (1/1) (3.08 - 3.08)	3.08 (1/1) (3.08 - 3.08)	0
Sand Bass	Mn-54 2	0.13	<LLD (0/1)	—	(0/1)	<LLD (0/1)	0
Sand Bass	Zn-65 2	0.26	<LLD (0/1)	—	(0/1)	<LLD (0/1)	0
Spiny Lobster	Co-58 5	0.13	<LLD (0/4)	—	(0/1)	<LLD (0/1)	0
Spiny Lobster	Co-60 5	0.13	0.0330 (1/4) (0.0330 - 0.0330)	(B) Units 2 and 3 Outfall 1.5 Mi. SSW	0.0330 (1/2) (0.0330 - 0.0330)	<LLD (0/1)	0

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 04/12/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed		Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)		Location with Highest Annual Mean		Control Locations Mean (Range)		Number of Nonroutine Reported Measurements	
						Name, Distance and Direction	Mean (Range)				
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)											
Spiny Lobster	Cs-134	5	0.13	< LLD	(0/4)		----	(0/1)	< LLD	(0/1)	0
Spiny Lobster	Cs-137	5	0.15	< LLD	(0/4)	(C) Laguna Beach 18.2 Mi. NW	0.0170 (0.0170 - 0.0170)	(1/1)	0.0170 (0.0170 - 0.0170)	(1/1)	0
Spiny Lobster	Fe-59	5	0.26	< LLD	(0/4)		----	(0/1)	< LLD	(0/1)	0
Spiny Lobster	K-40	5	1.4	2.87 (2.47 - 3.29)	(4/4)	(C) Laguna Beach 18.2 Mi. NW	3.16 (3.16 - 3.16)	(1/1)	3.16 (3.16 - 3.16)	(1/1)	0
Spiny Lobster	Mn-54	5	0.13	< LLD	(0/4)		----	(0/1)	< LLD	(0/1)	0
Spiny Lobster	Zn-65	5	0.26	< LLD	(0/4)		----	(0/1)	< LLD	(0/1)	0

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/12/05

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements		
Semi-Annual Local Crops Gamma Spectral Analysis - Table 13A (pCi/g)									
Arugula	Be-7	2	0.3	<LLD	(0/0)	South East of Oceanside 22 Mi. SE	0.25 (2/2) (0.0750 - 0.43)	0.25 (2/2) (0.0750 - 0.43)	0
Arugula	Cs-134	2	0.06	<LLD	(0/0)		— (0/2)	<LLD (0/2)	0
Arugula	Cs-137	2	0.08	<LLD	(0/0)	South East of Oceanside 22 Mi. SE	0.0150 (1/2) (0.0150 - 0.0150)	0.0150 (1/2) (0.0150 - 0.0150)	0
Arugula	I-131	2	0.06	<LLD	(0/0)		— (0/2)	<LLD (0/2)	0
Arugula	K-40	2	1	<LLD	(0/0)	South East of Oceanside 22 Mi. SE	3.30 (2/2) (2.53 - 4.07)	3.30 (2/2) (2.53 - 4.07)	0
Baby Squash	Cs-134	2	0.06	<LLD	(0/0)		— (0/2)	<LLD (0/2)	0
Baby Squash	Cs-137	2	0.08	<LLD	(0/0)		— (0/2)	<LLD (0/2)	0
Baby Squash	I-131	2	0.06	<LLD	(0/0)		— (0/2)	<LLD (0/2)	0
Baby Squash	K-40	2	1	<LLD	(0/0)	South East of Oceanside 22 Mi. SE	2.89 (2/2) (2.24 - 3.53)	2.89 (2/2) (2.24 - 3.53)	0
Collard Greens	Cs-134	1	0.06	<LLD	(0/1)		— (0/1)	<LLD (0/0)	0
Collard Greens	Cs-137	1	0.08	<LLD	(0/1)		— (0/1)	<LLD (0/0)	0

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/12/05

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Semi-Annual Local Crops Gamma Spectral Analysis - Table 13A (pCi/g)							
Collard Greens	I-131	1	0.06 < LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Collard Greens	K-40	1	1 2.68 (1/1) (2.68 - 2.68)	SONGS Garden 0.4 Mi. NNW	2.68 (1/1) (2.68 - 2.68)	< LLD (0/0)	0
Sorrel	Cs-134	1	0.06 < LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Sorrel	Cs-137	1	0.08 < LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Sorrel	I-131	1	0.06 < LLD (0/1)	---	(0/1)	< LLD (0/0)	0
Sorrel	K-40	1	1 3.09 (1/1) (3.09 - 3.09)	SONGS Garden 0.4 Mi. NNW	3.09 (1/1) (3.09 - 3.09)	< LLD (0/0)	0
Zucchini	Cs-134	2	0.06 < LLD (0/2)	---	(0/2)	< LLD (0/0)	0
Zucchini	Cs-137	2	0.08 < LLD (0/2)	---	(0/2)	< LLD (0/0)	0
Zucchini	I-131	2	0.06 < LLD (0/2)	---	(0/2)	< LLD (0/0)	0
Zucchini	K-40	2	1 2.21 (2/2) (1.96 - 2.45)	SONGS Garden 0.4 Mi. NNW	2.21 (2/2) (1.96 - 2.45)	< LLD (0/0)	0

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 03/14/05

**DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA**

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Annual Soil Analysis - Depth 3' - Table 14 (pCi/g)							
	Cs-134	5	0.15 <LLD (0/4)		<LLD (0/1)	<LLD (0/1)	0
	Cs-137	5	0.18 0.0980 (0.0320 - 0.16) (2/4)	Old Route 101 - East Southeast 3 Mi. ESE	0.16 (1/1) (0.16 - 0.16)	<LLD (0/1)	0
	K-40	5	1.5 14.01 (7.14 - 18.26) (4/4)	Camp San Onofre 2.6 Mi. NE	18.26 (1/1) (18.26 - 18.26)	15.48 (15.48 - 15.48) (1/1)	0
	Th-228	5	0.4 0.52 (0.36 - 0.61) (4/4)	Former Visitor's Center (East Site Boundary) 0.4 Mi. NW	0.61 (1/1) (0.61 - 0.61)	0.49 (0.49 - 0.49) (1/1)	0

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 04/13/05

**DOCKET NOS. 50-206, 50-361, 50-362
SAN DIEGO COUNTY, CALIFORNIA**

Reporting Period : 1/1/2004 To 12/31/2004

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed		Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements	
					Name, Distance and Direction	Mean (Range)			
Semi-Annual Kelp Analysis - Table 15 (pCi/g)									
Macrocystis p.	Cs-134	8	0.06	0.0210 (1/6) (0.0210 - 0.0210)	(C) Barn Kelp Bed 6.3 Mi. SSE	0.0210 (1/2) (0.0210 - 0.0210)	< LLD (0/2)	0	
Macrocystis p.	Cs-137	8	0.08	< LLD (0/6)		---- (0/2)	< LLD (0/2)	0	
Macrocystis p.	I-131	8	0.06	0.0622 (5/6) (0.0420 - 0.0900)	(A) San Onofre Kelp Bed 1.5 Mi. S	0.0900 (1/2) (0.0900 - 0.0900)	0.0490 (2/2) (0.0260 - 0.0720)	0	
Macrocystis p.	K-40	8	1	9.29 (6/6) (8.06 - 10.68)	(B) San Mateo Kelp Bed 3.8 Mi. WNW	9.79 (2/2) (8.89 - 10.68)	9.17 (2/2) (8.86 - 9.48)	0	

APPENDIX C
SUMMARY OF 2004 QUALITY CONTROL PROGRAMS

All REMP samples are collected, shipped, and analyzed in accordance with NRC Regulatory Guide 4.15. Marine radiological environmental samples are collected by a vendor, MBC Environmental, per the vendor's Quality Assurance manual. REMP sample analysis is performed by the Contracted Environmental Analysis Laboratory (CEAL) in accordance with the Laboratory Quality Assurance Plan. During 2004 the CEAL was Duke Engineering Services.

INTERLABORATORY CROSS-CHECK PROGRAM:

The CEAL participates in a number of independent cross check programs, including the National Institute of Standards and Technology (NIST) and Analytics cross-check programs. A summary of the available 2004 Analytics cross check data is included in Table C-1. The CEAL's performance meets the criteria described in Reg. Guide 4.15. Discrepancies and out-of-tolerance results are resolved through a formal Condition Report evaluation process. During 2004, the acceptance criteria was met for all analytics cross-check samples.

COMPARISON OF TLD AND PIC DATA

The SONGS REMP measures direct radiation at the various indicator and CONTROL locations with Thulium doped CaSO_4 Panasonic Thermoluminescent Dosimeters (TLDs). The TLDs are collected quarterly and the corresponding dose is measured by the contracted laboratory. Transit dose and fade are compensated for in the reported results. A number of the REMP TLDs are located adjacent to Pressurized Ion Chamber (PIC) direct radiation dose rate meters. Data from the PICs are fed into a central processing unit with readouts near the control room. The PICs serve to provide real time monitoring of the radiation dose rates in the inner ring of SONGS. PIC data from the first quarter of 2004 were assembled and the average dose rate was converted to a quarterly total dose. The resulting PIC measured total quarterly dose compare favorably to the measured TLD total quarterly dose as shown in the tables below.

TLD phosphors tend to over-respond to the lower energy levels and the TLD package has a thin lead shielding to compensate for this over-response. The complete TLD packages meet the requirements of ANSI N545. The energy response data for the PICs was reviewed for this report. The PIC energy response is relatively linear above ~75keV.

FIRST QUARTER 2004 PIC / TLD DATA COMPARISON

	PIC-1 & TLD 10	PIC-2 & TLD 67	PIC-3 & TLD 40	PIC-4 & TLD 61	PIC-5 & TLD 62	PIC-6 & TLD 63	PIC-7 & TLD 64	PIC-8 & TLD 65	PIC-9 & TLD 66
Average PIC Dose Rate in mR/hour	7.68E-03	8.02E-03	7.78E-03	8.12E-03	6.85E-03	6.98E-03	7.15E-03	6.42E-03	6.58E-03
PIC total quarterly dose in mR (91day)	16.8	17.5	17.0	17.7	15.0	15.3	15.6	14.0	14.4
TLD measured quarterly dose in mR ± one sigma (empirical)	16.22 ±1.04	18.42 ±1.81	17.74 ±0.60	17.07 ±0.67	13.26 ±1.0	14.49 ±0.71	16.0 ±0.68	14.5 ±0.77	15.55 ±0.93

QUARTERLY DUPLICATE TLDs

SONGS deployed a duplicate TLD package in the same location and canister as TLD 66. The quarterly dose measured by these separate TLD packages is nearly identical.

DUPLICATE TLD DATA COMPARISON

	1 ST QUARTER	2 ND QUARTER	3 RD QUARTER	4 TH QUARTER
TLD 66	15.55 ±0.93	12.77 ±0.93	13.09 ±0.62	12.87 ±0.69
TLD 200	14.6 ±0.58	13.16 ±1.15	12.62 ±1.0	12.58 ±0.78

ANNUAL DUPLICATE TLDs

An annual duplicate TLD package is collocated with TLD 67.

TLD 67 average dose in mR per standard quarter	TLD 201 (annual duplicate) dose in mR per standard quarter
16.76	16.50

CALIBRATION OF AIR SAMPLER VOLUME METERS

The Shop Services and Instrumentation Division of SCE performs an annual calibration procedure using standards referenced to NIST on all REMP air sampler gas meters. When the gas meters are removed from service, the meter is calibrated and the calibration reports are reviewed for bias. This is an *a posteriori* review of the gas meter performance to evaluate method bias and to identify possible outlier analysis results. In 2004, three (3) gas meters failed to meet this criterion at all calibrated flow rates. A review of the affected gross beta data has revealed no meaningful anomalies. Thus no discernable impact to the REMP database or conclusions resulted from use of the out of tolerance gas meters.

TABLE C-1

ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
A17266-162	3rd / 2003	Liquid	Fe-55	$\mu\text{Ci/cc}$	4.71E-04	4.71E-04	1.00	Agreement
A17267-162	3rd / 2003	Liquid	Sr-89	$\mu\text{Ci/cc}$	3.14E-03	3.50E-03	0.90	Agreement
A17267-162	3rd / 2003	Liquid	Sr-90	$\mu\text{Ci/cc}$	2.64E-04	2.99E-04	0.88	Agreement
A17515-162	4th / 2003	Liquid	Fe-55	$\mu\text{Ci/cc}$	2.82E-04	2.89E-04	0.97	Agreement
A17516-162	4th / 2003	Liquid	Sr-89	$\mu\text{Ci/cc}$	3.50E-03	3.86E-03	0.91	Agreement
A17516-162	4th / 2003	Liquid	Sr-90	$\mu\text{Ci/cc}$	2.37E-04	2.65E-04	0.89	Agreement
A17776-162	1st / 2004	Liquid	Fe-55	$\mu\text{Ci/cc}$	1.39E-04	1.58E-04	0.88	Agreement
A17777-162	1st / 2004	Liquid	Sr-89	$\mu\text{Ci/cc}$	1.35E-03	1.54E-03	0.88	Agreement
A17777-162	1st / 2004	Liquid	Sr-90	$\mu\text{Ci/cc}$	1.10E-04	1.24E-04	0.89	Agreement
A18125-162	2nd / 2004	Liquid	Fe-55	$\mu\text{Ci/cc}$	9.99E-05	1.12E-04	0.89	Agreement
A18126-162	2nd / 2004	Liquid	Sr-89	$\mu\text{Ci/cc}$	3.76E-03	3.96E-03	0.95	Agreement
A18126-162	2nd / 2004	Liquid	Sr-90	$\mu\text{Ci/cc}$	3.27E-04	3.60E-04	0.91	Agreement
E3937-162	4th / 03	Water	H-3	pCi/L	2307	2290	1.01	Acceptable
E3938-162	4th / 03	Water	Sr-89	pCi	99	100	0.99	Acceptable
E3938-162	4th / 03	Water	Sr-90	pCi	11	10	1.10	Acceptable
E3939-162	4th / 03	Filter	Gross Alpha	pCi	15	16	0.94	Acceptable
E3939-162	4th / 03	Filter	Gross Beta	pCi	50	47	1.06	Acceptable
E3940-162	4th / 03	Filter	Ce-141	pCi	110	100	1.10	Acceptable
E3940-162	4th / 03	Filter	Cr-51	pCi	171	153	1.12	Acceptable
E3940-162	4th / 03	Filter	Cs-134	pCi	75	74	1.01	Acceptable
E3940-162	4th / 03	Filter	Cs-137	pCi	75	71	1.06	Acceptable
E3940-162	4th / 03	Filter	Co-58	pCi	64	61	1.05	Acceptable
E3940-162	4th / 03	Filter	Mn-54	pCi	103	95	1.08	Acceptable
E3940-162	4th / 03	Filter	Fe-59	pCi	64	56	1.14	Acceptable
E3940-162	4th / 03	Filter	Zn-65	pCi	117	108	1.08	Acceptable

TABLE C-1

ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
E3940-162	4th / 03	Filter	Co-60	pCi	82	85	0.96	Acceptable
E3941-162	4th / 03	Filter	Sr-89	pCi	103	109	0.94	Acceptable
E3941-162	4th / 03	Filter	Sr-90	pCi	11	11	1.00	Acceptable
E3942-162	4th / 03	Milk	I-131	pCi/L	84	90	0.93	Acceptable
E3942-162	4th / 03	Milk	I-131LL(1)	pCi/L	91	90	1.01	Acceptable
E3942-162	4th / 03	Milk	Ce-141	pCi/L	191	202	0.95	Acceptable
E3942-162	4th / 03	Milk	Cr-51	pCi/L	275	280	0.98	Acceptable
E3942-162	4th / 03	Milk	Cs-134	pCi/L	135	135	1.00	Acceptable
E3942-162	4th / 03	Milk	Cs-137	pCi/L	126	129	0.98	Acceptable
E3942-162	4th / 03	Milk	Co-58	pCi/L	107	111	0.96	Acceptable
E3942-162	4th / 03	Milk	Mn-54	pCi/L	173	173	1.00	Acceptable
E3942-162	4th / 03	Milk	Fe-59	pCi/L	106	102	1.04	Acceptable
E3942-162	4th / 03	Milk	Zn-65	pCi/L	203	197	1.03	Acceptable
E3942-162	4th / 03	Milk	Co-60	pCi/L	148	155	0.95	Acceptable
E4057-162	1st / 04	Water	Gross Alpha	pCi/L	72.3	74.5	0.97	Acceptable
E4057-162	1st / 04	Water	Gross Beta	pCi/L	285.7	301	0.95	Acceptable
E4058-162	1st / 04	Water	I-131	pCi/L	94	90.2	1.04	Acceptable
E4058-162	1st / 04	Water	I-131LL	pCi/L	88.7	90.2	0.98	Acceptable
E4058-162	1st / 04	Water	Ce-141	pCi/L	87.5	85	1.03	Acceptable
E4058-162	1st / 04	Water	Cr-51	pCi/L	335	326	1.03	Acceptable
E4058-162	1st / 04	Water	Cs-134	pCi/L	86	89.7	0.96	Acceptable
E4058-162	1st / 04	Water	Cs-137	pCi/L	185.6	185	1.00	Acceptable

(1) - I-131LL is a low level I-131 analysis

TABLE C-1

ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
E4058-162	1st / 04	Water	Co-58	pCi/L	113.2	112	1.01	Acceptable
E4058-162	1st / 04	Water	Mn-54	pCi/L	112.3	114	0.99	Acceptable
E4058-162	1st / 04	Water	Fe-59	pCi/L	60.8	56.7	1.07	Acceptable
E4058-162	1st / 04	Water	Zn-65	pCi/L	149.1	143	1.04	Acceptable
E4058-162	1st / 04	Water	Co-60	pCi/L	151.4	153	0.99	Acceptable
E4059-162	1st / 04	Water	Sr-89	pCi	107.7	123	0.88	Acceptable
E4059-162	1st / 04	Water	Sr-90	pCi	14.85	14.5	1.02	Acceptable
E4060-162	1st / 04	Filter	Gross Alpha	pCi/L	48.09	58.9	0.82	Acceptable
E4060-162	1st / 04	Filter	Gross Beta	pCi/L	231.1	218	1.06	Acceptable
E4061-162	1st / 04	Milk	I-131	pCi/L	77.73	77.7	1.00	Acceptable
E4061-162	1st / 04	Milk	I-131LL	pCi/L	83.6	77.7	1.08	Acceptable
E4061-162	1st / 04	Milk	Ce-141	pCi/L	92	85.2	1.08	Acceptable
E4061-162	1st / 04	Milk	Cr-51	pCi/L	314	327	0.96	Acceptable
E4061-162	1st / 04	Milk	Cs-134	pCi/L	88.7	90	0.99	Acceptable
E4061-162	1st / 04	Milk	Cs-137	pCi/L	188.6	185	1.02	Acceptable
E4061-162	1st / 04	Milk	Co-58	pCi/L	115	112	1.03	Acceptable
E4061-162	1st / 04	Milk	Mn-54	pCi/L	114.7	114	1.01	Acceptable
E4061-162	1st / 04	Milk	Fe-59	pCi/L	59.7	56.8	1.05	Acceptable
E4061-162	1st / 04	Milk	Zn-65	pCi/L	145.5	143	1.02	Acceptable
E4061-162	1st / 04	Milk	Co-60	pCi/L	154.8	153	1.01	Acceptable
E4062-162	1st / 04	Milk	Sr-89	pCi	86.2	103	0.84	Acceptable
E4062-162	1st / 04	Milk	Sr-90	pCi	12.7	12.1	1.05	Acceptable

APPENDIX D

**COMPARISON OF OPERATIONAL TO PREOPERATIONAL DATA
AND ANALYSIS OF TRENDS**

Comparison of Operational to Preoperational Data and Analysis of Trends

Unit 1 achieved criticality on June 14, 1967 and was permanently retired from service on November 30, 1992. Unit 2 attained initial criticality on July 26, 1982 and Unit 3 on August 29, 1983. Unit 2 was operational for 303 days in 2004. Unit 3 was operational for 264 days in 2004.

A variety of environmental samples were analyzed and the analytical results (January 1, 1979 to July 31, 1982) were compared with the 2004 operational data obtained for SONGS Units 2/3, which is the subject post-operational period for SONGS Unit 1.

The following media were evaluated and compared with the operational data of SONGS Units 1, 2 and 3:

- | | |
|------------------------------|---------------------------|
| A. External Radiation | F. Ocean Bottom Sediments |
| B. Air Particulates | G. Marine Species |
| C. Radioiodine | H. Local Crops |
| D. Ocean Water | I. Soil |
| E. Shoreline Sediment (sand) | J. Kelp |
| | K. Drinking Water |

All of the measurements obtained from the SONGS Unit 1 operational Radiological Environmental Monitoring Program (REMP) during the period from January 1979 to July 1982 are used as the preoperational baseline for SONGS Units 2/3. This is in accordance with San Onofre Units 2/3, Environmental Report, Operating License Stage, Appendix 6A, Pre-operational Radiological Environmental Monitoring, May 31, 1978. Comparisons of preoperational data to 2004 operational data are possible for each of the exposure pathways to man, namely: (1) direct radiation, (2) air particulates (inhalation), and (3) ocean water (waterborne). Comparisons can also be made between preoperational and operational data for ocean bottom sediment data to ascertain if there has been any significant increase in radioactivity in ocean bottom sediments in the vicinity of the SONGS Units 2/3 outfalls.

A. Direct Radiation

SONGS Unit 1:

No direct radiation data were obtained in the preoperational period of 1964 to 1967 to compare with the operational data.

SONGS Units 2/3:

Direct radiation measurements for the SONGS REMP were made quarterly at 38 indicator locations and 11 CONTROL locations in 2004. (See Appendix I for ISFSI TLD data). Direct radiation samples (TLDs) were collected at a number of inner and outer ring locations as specified by the ODCM. During the preoperational period from January 1979 to July 31, 1982, the indicator stations ranged from 16.1 to 46.6 millirem.

The preoperational indicator average was 25.3. The preoperational CONTROL range was 19.3 to 30.1 and the CONTROL mean was 23.1. During the 2004 operational year for Units 2/3, the

routine indicator TLD locations ranged from 9.8 to 23.6 millirem, averaging 16.1 millirem while the CONTROL locations ranged from 11.5 to 19.7 millirem with an average of 15.1 millirem.

Factors such as meteorology, geographic location, the fallout from atmospheric nuclear weapons testing, and seasonal fluctuations account for the variability in the data seen during the preoperational period for each location. The decrease in radiation levels at all TLD sample locations is attributable to the curtailment of the atmospheric nuclear weapons testing, and the continued decay of fission products from previous nuclear weapons tests.

The average direct radiation doses were larger at both indicator and CONTROL locations during the preoperational period than during the 2004 operational period for SONGS Units 2/3. The larger average observed during the preoperational time span may be attributable to Chinese atmospheric nuclear weapons tests on March 14, 1978 and on October 15, 1980. The large average of annual direct radiation levels seen at most TLD sample locations during 1986 and 1987 is attributable to the Chernobyl Nuclear Power Plant accident that occurred April 26, 1986.

Figures 2A & 2B compare the environmental radiation levels of selected indicator and CONTROL locations during the operational and preoperational periods. Simultaneous variation in the radiation levels at both the CONTROL and indicator locations show that the variations are due to factors external to SONGS. The operation of SONGS had no impact on the environment as measured by this sample medium.

B. Air Particulates

SONGS Unit 1:

Before SONGS Unit 1 attained initial criticality, samples of air particulate gross beta activity were collected from indicator and CONTROL locations. During the preoperational period of 1964-1967, detectable gross beta activity at the indicator locations ranged from 0.030 to 3.810 pCi/m³, averaging 0.253 pCi/m³. The CONTROL location of Huntington Beach (HBGS) had an average gross beta activity of 0.306 ranging from 0.04 to 2.77 pCi/m³. During 2004, the gross beta activity at the indicator locations ranged from 0.007 to 0.0973 pCi/m³, and averaging 0.0259 pCi/m³. The Oceanside CONTROL location gross beta activity ranged from 0.009 to 0.0805 pCi/m³ with an average of 0.0245 pCi/m³. The decrease in activity levels between 1965 and 2004 is ascribed to the curtailment of atmospheric nuclear weapons testing and the resultant decrease in fallout. Refer to figures 3A & B. There was a close correlation between indicator and CONTROL locations in 2004. The operation of SONGS had no impact on the environment as measured by this sample medium.

Valid comparisons of preoperational data to the 2004 postoperational data are difficult to make because the preoperational background levels are elevated by a factor of about ten due to the atmospheric nuclear weapons testing fallout.

SONGS Units 2/3:

From January 1979 through July 1982 (considered to be the preoperational period for SONGS Units 2/3), there is a period of noticeably higher gross beta activity in air at all sample locations. This period extends from the fourth quarter of 1980 through the fourth quarter of 1981. These

higher activity levels are attributable to the Chinese atmospheric nuclear weapons test conducted on October 15, 1980.

Figures 3A, 3B, and 3C compare the monthly average gross beta particulate in air activity levels of selected indicator locations with the CONTROL location over a period of 28 years (January 1976 to December 2004). The data clearly show a close correlation between the indicator and control locations for the entire time period covered. The various spike increases in gross beta activity at all sample locations are closely grouped and timed to coincide with known events external to SONGS with worldwide radiological impact. These events include: Chinese atmospheric nuclear weapons testing on September 17, 1977; March 14, 1978; October 15, 1980; and the April 1986 Chernobyl accident. The graphs (Figures 3A and 3B) show that the environmental levels of gross beta remained substantially similar at both the indicator and the CONTROL locations over an extended period of time, with both CONTROL and indicator locations showing simultaneous variations of equal magnitude. The fluctuations in gross beta activity are not attributable to SONGS and are the result of other environmental phenomena and seasonal variations.

C. Radioiodine

SONGS Unit 1:

No preoperational data are available. All 2004 data were below both the *a priori* LLD (0.07 pCi/m³) and the lower, count specific, *a posteriori* MDC.

SONGS Units 2/3:

Most of the preoperational and all of the 2004 operational data for I-131 level were below the detection limit.

D. Ocean Water

SONGS Unit 1:

No samples were obtained for the preoperational period of SONGS Unit 1.

SONGS Units 2/3:

Ocean water samples were collected on a monthly basis in the vicinity of each of the Station discharge outfalls, which served as indicator locations, and from the Newport Beach CONTROL location. The ocean water samples are analyzed for naturally-occurring and station-related gamma-emitting radionuclides. They are composited quarterly and analyzed for tritium.

During the preoperational period, naturally-occurring potassium-40 was detected in each of the samples collected from both indicator and CONTROL locations. Other gamma-emitting radionuclides were detected in only one ocean water sample. In May 1980, Co-58, Co-60, Cs-134, and Cs-137 were detected in an ocean water sample collected from the SONGS Unit 1 outfall. Concentrations of the radionuclides in this sample were 11, 6, 380, and 430 pCi/l, respectively. Tritium was also detected in two of the ocean water samples collected in May 1980

from the SONGS Unit 2 outfall and from the Newport Beach CONTROL location. Reduction in effluent activity through programmatic changes at Unit 1 may have reduced activity levels in ocean water.

For tritium and all SONGS related radionuclides, the data collected at all locations during the 2004 operational period were below both the *a priori* LLD and the lower *a posteriori* MDC. We conclude that the operation of SONGS had no impact on the environment as measured by this sample medium.

E. Shoreline Sediments (Sand)

SONGS Unit 1:

Shoreline sediment samples were not collected during the preoperational period for SONGS 1.

SONGS Units 2/3:

Beach sand is collected semiannually from three indicator locations and from a CONTROL location situated at Newport Beach. The samples are analyzed for 26 naturally-occurring and plant-related radionuclides.

To assess the impact of SONGS operations on this environmental medium, preoperational data were compared to 2004 operational data. The radionuclide detected in shoreline sediment in the preoperational time frame was Cs-137 with a range of 0.012 to 0.022 pCi/g, averaging 0.019 in 5 sediment samples. One CONTROL sample with a Cs-137 activity of 0.032 pCi/g was observed in July 1979. The presence of Cs-137 in both CONTROL and indicator locations during the preoperational period leads to the conclusion that the root cause is external to SONGS and is most likely attributable to atmospheric nuclear weapons testing. No SONGS-related radionuclides were detected in shoreline sediment during the 2004 operational period, thus the impact of SONGS on the environment as measured by the sample medium is considered to be negligible.

F. Ocean Bottom Sediments

SONGS Unit 1:

Ocean bottom sediment samples were not collected during the preoperational phase of Unit 1, and, therefore, no comparison can be made. However, operational data for SONGS 1 did not reveal the presence of any significant radioactivity in the sediment samples.

SONGS Units 2/3:

During the preoperational and operational periods, representative samples of ocean bottom sediments were collected semiannually from each of the Station discharge outfalls and from a CONTROL station in Laguna Beach. The samples were analyzed for naturally occurring and SONGS related radionuclides. The results of the analyses are listed in Table D-1B. It is clear in reviewing/evaluating the data that the concentration of each of the radionuclides has decreased with time or has been consistently below the lower limit of detection.

SONGS-related radionuclides were also detected in samples collected during preoperational period. Manganese-54 (Mn-54) was detected in 5 of the 28 samples. The concentrations of Mn-54 in these samples ranged from 0.015 to 0.49 pCi/g, averaging 0.13 pCi/g. Cobalt-58 (Co-58) was detected in nine samples. The concentration of Co-58 in the samples ranged from 0.013 to 1.16 pCi/g, averaging 0.20 pCi/g. Cobalt-60 (Co-60) was measured in 15 of the 28 samples. The concentration of Co-60 in the sample ranged from 0.014 to 8.1 pCi/g, averaging 0.79 pCi/g. Cs-137 was also detected in 16 of the 28 samples. The concentrations of Cs-137 in the samples ranged from 0.014 to 0.090 pCi/g, averaging 0.039 pCi/g. Cerium-144 (Ce-144) was found in two samples. The concentration of Ce-144 in the samples was 0.06 and 0.26 pCi/g, respectively.

The results indicate that there has not been a build-up of radionuclides with time in ocean bottom sediments near SONGS. The results also indicate notable decrease in the concentrations of plant-related radionuclides in the ocean bottom sediment. Although Co-58, Co-60, and Cs-137 are normally associated with nuclear power operations, preoperational study reveals no accumulation trend for these radionuclides, and no increase in levels for these radionuclides was detected during the operational period.

The concentration of station-related radionuclides in all ocean bottom sediment samples analyzed in 2004 was below the *a priori* LLD as well as below the lower *a posteriori* MDC. We conclude that operation of SONGS Units 2/3 has had a negligible impact upon this environmental medium.

TABLE D-1A
SHORELINE SEDIMENTS CONCENTRATION (pCi/g, wet weight)
PREOPERATIONAL AND OPERATIONAL DATA*
SONGS UNITS 2/3

Radionuclide**	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Cs-137	PreOp	0.012-0.022	0.019	<LLD-0.032	<LLD
All other measured SONGS related radionuclides	PreOp	< LLD	< LLD	< LLD	< LLD
	Operational	< LLD	< LLD	< LLD	< LLD

TABLE D-1B
OCEAN BOTTOM SEDIMENTS CONCENTRATION (pCi/g, wet weight)
PREOPERATIONAL AND OPERATIONAL DATA*
SONGS UNITS 2/3

Radionuclide**	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Mn-54	PreOp	0.0150-0.49	0.129	<LLD	<LLD
Co-58	PreOp	0.013-1.160	0.199	<LLD	<LLD
Co-60	PreOp	0.014-8.100	0.788	<LLD	<LLD
Ag-110m	PreOp	<LLD-0.020	<LLD	<LLD	<LLD
Cs-137	PreOp	0.014-0.090	0.039	<LLD-0.043	<LLD
Ce-144	PreOp	0.060-0.260	0.160	<LLD	<LLD
All other measured SONGS related radionuclides	PreOp	< LLD	< LLD	< LLD	< LLD
	Operational	< LLD	< LLD	< LLD	< LLD

* PreOp = January 1979 to July 1982; Operational - January to December 2004
 ** During January to December 2004 all station related Radionuclides from all sample locations were < LLD
 LLD Lower limits of detection for operational data are listed in Appendix B.

G. Marine Species (Flesh)

SONGS Unit 1:

Marine species were not collected during the preoperational period for SONGS Unit 1. No comparison with operational data is possible.

SONGS Units 2/3:

Non-migratory marine species were collected semi-annually near SONGS to determine the amount of radioactivity that could be consumed by man or that was present in the food chain to man. Marine species caught by the SONGS outfalls and from Laguna Beach include two species of adult fish, crustacea and mollusks. Upon collection, the flesh portion is analyzed for gamma-emitting radionuclides as specified in the ODCM. The results are subsequently reported as pCi/gram wet weight.

Results for several marine species for both the preoperational and 2004 operational periods for Units 2/3 are summarized in Table D-2. The marine species used for purposes of comparison include: sheephead (a fish), black perch (a fish), bay mussel (a mollusk), spiny lobster (a crustacea), and keyhole limpet (a mollusk). Radionuclides analyzed but not included in Table D-2 were below the lower limits of detection for both the preoperational and operational periods.

During the 2004 operational period, no SONGS related radionuclides were detected at either the *a priori* LLD or the lower *a posteriori* MDC. The data indicate no accumulation trends. The operation of SONGS Units 2/3 in 2004 had no impact on the environment as measured by this sample medium.

TABLE D-2

**MARINE SPECIES CONCENTRATIONS (pCi/g, wet weight) PREOPERATIONAL
AND 2004 OPERATIONAL DATA (SONGS UNITS 2/3)**

Sheephead Flesh**

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-58	PreOp	0.016-0.030	0.023	<LLD	<LLD
Co-60	PreOp	0.005-0.044	0.017	<LLD	<LLD
Cs-137	PreOp	0.004-0.018	0.007	0.005-0.012	0.007
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related radionuclides	Operational	< LLD	< LLD	< LLD	< LLD

Black Perch Flesh**

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-58	PreOp	0.009-0.011	0.010	<LLD	<LLD
Co-60	PreOp	0.004-0.045	0.017	<LLD	<LLD
Ag-110m	PreOp	0.002-0.009	0.006	<LLD	<LLD
Cs-137	PreOp	0.003-0.015	0.008	0.004-0.014	0.009
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related radionuclides	Operational	< LLD	< LLD	< LLD	< LLD

* PreOp = January 1979 to July 1982; Operational - January to December 2004

** During January to December 2004 all station related Radionuclides from all sample locations were < LLD

LLD Lower limits of detection for operational data are listed in Appendix B.

TABLE D-2

MARINE SPECIES CONCENTRATIONS (pCi/g, wet weight) PREOPERATIONAL
AND 2004 OPERATIONAL DATA (SONGS UNITS 2/3)**Bay Mussel Flesh****

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Mn-54	PreOp	0.009-0.025	0.017	<LLD	<LLD
Co-58	PreOp	0.008-0.080	0.028	--	--
Co-60	PreOp	0.005-0.40	0.077	<LLD	<LLD
Cs-137	PreOp	0.003-0.006	0.004	<LLD	<LLD
Ru-103	PreOp	<LLD-0.045	<LLD	<LLD	<LLD
All other measured	PreOp	<LLD	<LLD	<LLD	<LLD
SONGS related radionuclides	Operational	<LLD	<LLD	<LLD	<LLD

Spiny Lobster Flesh**

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-58	PreOp	0.007-0.270	0.086	<LLD	<LLD
Co-60	PreOp	0.014-0.210	0.060	<LLD	<LLD
Cs-137	PreOp	0.005-0.011	0.008	0.040-0.015	0.008
All other measured	PreOp	<LLD	<LLD	<LLD	<LLD
SONGS related radionuclides	Operational	<LLD	<LLD	<LLD	<LLD

* PreOp = January 1979 to July 1982; Operational - January to December 2004

** During January to December 2004 all station related Radionuclides from all sample locations were < LLD

LLD Lower limits of detection for operational data are listed in Appendix B.

TABLE D-2

MARINE SPECIES CONCENTRATIONS (pCi/g, wet weight) PREOPERATIONAL
AND 2004 OPERATIONAL DATA (SONGS UNITS 2/3)Sea Hare Flesh**

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-57	PreOp	0.006-0.017	0.009	<LLD	<LLD
Co-58	PreOp	0.006-12.4	1.233	<LLD	<LLD
Co-60	PreOp	0.016-2.000	0.448	0.003-0.027	0.013
Zn-65	PreOp	<LLD-0.10	<LLD	<LLD	<LLD
Ag-110m	PreOp	0.018-0.50	0.138	0.020-0.039	0.030
Cs-137	PreOp	<LLD-0.004	<LLD	<LLD-0.005	<LLD
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
***SONGS related radionuclides	Operational	---	---	---	---

Keyhole Limpet (Flesh)**

Radionuclide**	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-58	PreOp	0.007-0.101	0.054	<LLD-0.190	<LLD
Co-60	PreOp	0.021-0.040	0.033	<LLD-0.022	0.022
Ag-110m	PreOp	0.033-0.101	0.054	0.005-0.042	0.022
Cs-137	PreOp	<LLD	<LLD	<LLD-0.005	<LLD
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related radionuclides	Operational	< LLD	< LLD	< LLD	< LLD

* PreOp = January 1979 to July 1982; Operational - January to December 2004

** During January to December 2004 all station related Radionuclides from all sample locations were < LLD

*** Sea Hare Flesh Samples were not collected in 2004

LLD Lower limits of detection for operational data are listed in Appendix B.

H. Local Crops

SONGS Unit 1:

During the preoperational phase of Unit 1, local crops were collected semiannually from both indicator and CONTROL locations, and subsequently analyzed for Sr-90. The range was 0.008 to 0.030 pCi/g wet weight. The average Sr-90 value was 0.022 pCi/g wet weight. Sr-90 is a common fission product likely due to atmospheric weapons tests.

During 2004, only naturally occurring radionuclides were detected in the crop samples.

SONGS Units 2/3:

In the preoperational period of January 1979 through July 1982, Sr-90 was detected in the CONTROL samples of kale, parsley, and squash. Naturally occurring K-40 was detected in cucumber, kale, and tomato samples from the indicator and CONTROL locations. Ce-144 and Zr-95 were detected in one sample of parsley at the CONTROL location at concentrations of 0.12 and 0.09 pCi/g, wet weight respectively.

In the 2004 operational period, only naturally occurring radionuclides were detected in the crop samples. The data indicate that the concentration of SONGS related radionuclides have decreased over time in this sample medium. This decrease is attributable to the termination of atmospheric nuclear weapons testing. The operation of SONGS had no impact on the environment as measured by this sample medium.

No samples of cucumber, kale, tomato, or parsley were obtained in 2004. Instead leafy crops consisted of arugula, sorrel, and collard greens and squash and zucchini constituted fleshy crops.

I. Soil

SONGS Unit 1:

No soil data were available for Unit 1 preoperational phase so a comparison cannot be made. However, gamma isotopic analysis of soil does not show any significant level of radioactivity. No accumulation pattern of plant-related radionuclides in the soil has been observed in the last 20 years.

SONGS Units 2/3:

A comparison of operational and preoperational data does not reveal any accumulation pattern of SONGS related isotopes in soil. The intermittent detection of Cs-137 in both indicator and CONTROL locations is due to residual fallout from atmospheric nuclear weapons testing.

J. Kelp

SONGS Unit 1:

Samples of kelp were not collected and analyzed during the preoperational period for SONGS Unit 1. No comparison with operational data is possible.

SONGS Units 2/3:

Kelp is collected semiannually from three indicator locations and from a CONTROL location situated in Laguna Beach. After collection, the samples are analyzed by gamma-spectral analysis for naturally-occurring and SONGS-related radionuclides.

To assess the impact of SONGS operations on kelp, preoperational data were compared to 2004 operational data in Table D-4. Radionuclides detected during the preoperational period for SONGS Units 2/3 include Mn-54, Co-60, Zr-95, I-131, and Cs-137.

During the 2004 operational period, I-131 was detected in six (6) samples obtained. No other station related isotopes were detected in kelp samples during the 2004 operational period. Figure 4 (I-131 in Kelp) shows a close correlation between indicator and control sample locations over a 25 year period.

Although I-131 activity has been randomly detected in kelp since 1977, there is no evidence that the concentration of I-131 or other station related radionuclides in kelp is increasing near SONGS. I-131 in kelp is most likely due to the sewer release of medical administrations, since it has been detected consistently in CONTROL as well as indicator locations. Since 1988 the concentration of I-131, when detected, has typically been highest at the CONTROL location. These data support the conclusion that during the Units 2/3 operational period, the detection of I-131 in kelp is primarily due to factors external to SONGS.

K. Drinking Water

No plant related radionuclides were detected during the 2004 operational period. Gross beta activity was detected during both the operational and preoperational periods at both the indicator and the CONTROL locations. No trends have been noted. There is no drinking water pathway for SONGS. The operation of SONGS had no impact on the environment as measured by this sample medium.

TABLE D-3
SOIL PREOPERATIONAL AND OPERATIONAL DATA* (pCi/g, dry weight)
SONGS UNITS 2/3

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Sr-90	PreOp	0.02-0.08	0.044	<LLD-0.03	<LLD
Cs-137	PreOp	0.02-0.20	0.096	<LLD-0.06	<LLD
Cs-137	Operational	< LLD-0.16	0.05	0.027	0.027
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related radionuclides	Operational	< LLD	< LLD	< LLD	< LLD

TABLE D-4
KELP PREOPERATIONAL AND OPERATIONAL DATA* (pCi/g, wet weight)
SONGS UNITS 2/3

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Mn-54	PreOp	<LLD-0.005	<LLD	<LLD	<LLD
Co-60	PreOp	0.006-0.009	0.008	<LLD	<LLD
Zr(Nb)-95	PreOp	0.014-0.090	0.046	0.018-0.053	0.036
I-131	PreOp	0.006-0.024	0.013	0.008-0.030	0.014
I-131	Operational	<LLD-0.009	0.052	<LLD-0.072	0.049
Cs-137	PreOp	0.004-0.009	0.006	<LLD	<LLD
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related radionuclides	Operational	< LLD	< LLD	< LLD	< LLD

* PreOp = January 1979 to July 1982; Operational - January to December 2004
LLD Lower limits of detection for operational data are listed in Appendix B.

APPENDIX E
DEVIATIONS FROM ODCM SAMPLING REQUIREMENTS
IN 2004

DEVIATIONS FROM THE ODCM SAMPLING REQUIREMENTS

Deviations from the Offsite Dose Calculation Manual (ODCM) sampling requirements are identified below in accordance with section 5.0 of the ODCM. The performance standard for environmental data collection of 95% was met for all sample types. During 2004, the ODCM specified *a priori* LLD was achieved for all REMP samples obtained. Deviations from the ODCM were associated with external factors not within the control of REMP personnel such as limited availability of marine samples at the locations specified in the ODCM. These minor unavoidable deviations from the ODCM had no meaningful impact on the REMP database and did not compromise the validity of the reported conclusions.

PART I TERRESTRIAL SAMPLING

A. WEEKLY AIR SAMPLING

Downtime for each air sampler in 2004 due to weekly sample collection, annual preventive maintenance (PM), and the annual gas meter change out was approximately 46 minutes for each sampler.

Weekly Change out:	Approximately 0.5 minutes x 52 = 26 minutes
Annual PM:	Approximately 15 minutes
Annual Gas Meter change out:	Approximately 5 minutes

Down times in excess of 1 hour are described below for each air sample. Air sampler availability remains well above 95%.

Air Sampler 1 (City of San Clemente): No deviations were observed.

Air Sampler 9 (State Beach Park): No deviations were observed.

Air Sampler 10 (Bluff): was out of service for 8.1 hours in 2004 due to power outages.

Air Sampler 11 (EOF): No deviations were observed.

Air Sampler 12 (Former SONGS Evaporation Pond): No deviations were observed.

Air Sampler 13 (Camp Pendleton East): was out of service for 245.6 hours during 2004 due to power outages.

Air Sampler 14 (Mesa Medical Facility): No deviations were observed.

Air Sampler 15 (Oceanside CONTROL): No deviations were observed.

Summary of Air Sampler Corrective Actions

The useful life of the vacuum pump motor assemblies is estimated to be five years based on the recommendation of the manufacturer and upon experience. If the internal components (motor and control valve) are replaced the useful life may be extended. During 2004 the REMP air samplers experienced no down time attributable to motor or vacuum pump assembly failure.

B. DIRECT RADIATION

No deviations were observed.

C. LOCAL CROPS

No deviations were observed.

D. SHORELINE SEDIMENTS

No deviations were observed.

E. DRINKING WATER

No deviations were observed.

F. SOIL

No deviations were observed.

PART II

MARINE SAMPLING

A. *NON-MIGRATORY MARINE ANIMALS*

Samples were collected from the specified ODCM sample location when samples were available at that location. When the specified sample type was not available at the ODCM listed location, alternate locations were selected based on sample availability and proximity to the specified sample location. All indicator samples were obtained within two miles of the associated outfall. In some cases the indicator species is not the same as the control species due to limited availability at the indicator location. Most non-migratory marine species samples were not available at the locations specified in the ODCM. Listed below are those samples which were obtained from substitute locations. All listed locations are relative to the midpoint of Units 2/3 during 2004. Adverse diving conditions prevented some of the spring samples from being collected in April 2004; those samples were collected in May 2004.

Sample Date	Sample Type	Actual Sample Location	ODCM Specified Sample Location
04/06/04	Sample A Unit 1 Black Surfperch, Sheepshead, Bay Mussel, Spiny Lobster	0.7 miles SW	U1 Outfall 0.9 miles WSW
04/06/04	Sample B Units 2/3 Giant Keyhole Limpet, Spiny Lobster	0.8 miles SW	U2/3 Outfall 1.5 miles SSW
05/18/04	Sample B Units 2/3 Opaleye, Black Perch	0.8 miles SW	
04/22/04	Sample C North CONTROL CA Sheepshead, Kelp Bass	17.5 miles NW	Laguna Beach (Control) 18.2 miles NW
05/18/04	Sample C North CONTROL Bay Mussel Sample C North CONTROL Spiny Lobster	17.1 miles NW 17.6 miles NW	
10/04/02	Sample A Unit 1 Sheepshead, Black Surfperch, Bay Mussel Sample A Unit 1 Spiny Lobster	0.7 miles SW 0.8 miles SW	U1 Outfall 0.9 miles WSW

B. *OCEAN WATER SAMPLING*

No deviations were observed.

C. OCEAN BOTTOM SEDIMENTS

Actual sample location depends on sediment availability which is a function of seasons, currents, and other macro environmental factors. The actual exact sample location is determined by a Global Positioning System (GPS) receiver. Variations in the location of available ocean bottom sediment have caused deviations from the ODCM in previous years. Deviations from the ODCM specified locations for 2004 are listed below.

Sample Date	Sample Type	Actual Location	ODCM Specified Location
04/22/04	E - Sediment	17.5 miles NW	18.2 miles NW
10/18/04	F - Sediment	0.8 miles WSW	0.9 miles WSW

D. KELP

Kelp is intermittently available at the various local kelp forests. Sea urchin population, El Nino and La Nina weather phenomena and other macro-environmental factors determine kelp sample availability. Samples were obtained from the kelp canopy closest to the ODCM specified location.

Sample Date	Sample Type	Actual Location	ODCM Specified Location
04/15/04	Sample B Kelp	3.6 miles WNW	3.8 miles WNW
	Sample C Kelp	6.3 miles SSE	6.3 miles SSE
10/18/04	Sample A Kelp	1.6 miles S	1.5 miles S
	Sample B Kelp	3.5 miles WNW	3.8 miles WNW
	Sample C Kelp	6.1 miles SE	6.3 miles SSE

APPENDIX F
LAND USE CENSUS

INTRODUCTION

Southern California Edison conducted the annual 2004 Land Use Census (LUC) in accordance with section 5.2 of the Offsite Dose Calculation Manual (ODCM). The purpose of the LUC is to identify important radiological exposure pathways to humans. The LUC identifies the nearest residences, milk animals, meat animals, gardens of at least 500 square feet that produce fleshy or leafy vegetables, and other specified uses (campgrounds, employment, etc.) in each of the meteorological landward sectors within five miles of SONGS. Results are summarized in Table F-1 and F-2 at the end of this appendix.

THE STUDY AREA

The study area includes half of the city of San Clemente (population estimated at 63,100 as of January 1, 2004), the San Clemente State Park, U.S. Marine Corps Base Camp Pendleton (MCB), San Onofre State Beach and Park, the San Clemente Ranch (now known as Seaview Farm), the former U. S. Coast Guard Station at San Mateo Point, and SONGS.

METHODOLOGY

A review of the 2003 LUC and documentation notebook was conducted. Verification and revision of the 2003 data was accomplished by inquiry to the cognizant agency, organization, or individual possessing direct knowledge of the item being verified.

The garden census was performed by examining aerial photographs taken July 19, 2004. The photographic image areas which appeared to correspond to likely garden locations were converted to street addresses. The identified locations and residences were visited to determine if a vegetable garden was present.

The closest residence was established in each sector by correspondence with cognizant authorities (City of San Clemente Planning Department and USMC Camp Pendleton). The meat and milk animal survey was performed by contacting the natural resources office on Camp Pendleton, the Orange County Agricultural Commissioner, the County of San Diego Department of Agriculture, and the 4H Club of Orange County. Information on other uses was obtained by contacting the appropriate organizations.

DEFINITIONS

Residence is defined as any structure (single-family house, apartment, mobile home, barracks or similar unit) occupied by individual(s) for three months (2,000 hours) or longer per year. Other Specified Use is defined as a location occupied by members of the general population as other than their primary residence. The use is divided into two categories: employment and non-employment related.

Employment use is defined as a location occupied by members of the general population engaged in normal work activities regardless of the length of time spent at the location, and regardless of its permanence, including concession stands, restaurants, markets and guard shacks.

Non-employment-related use is defined as a location occupied by members of the general population who are not engaged in normal work activities, including campgrounds, temporary housing, time-share condominiums, motels, hotels, schools and beaches.

Milk animals include, but are not limited to cows, goats and sheep, whose milk is used in dairy products for human consumption.

Meat animals include, but are not limited to deer, other game animals, cattle, goats and sheep, whose meat is used for human consumption.

Leafy vegetables include, but are not limited to lettuce, cabbage, collard greens, Bok choy, sorrel, and spinach.

Fleshy vegetables include, but are not limited to tomatoes, cucumbers, cauliflower, squash, beans, zucchini, and sweet corn.

SUMMARY OF CHANGES

1. Hunting. Updated hunting take information has been included in Table 6.
2. Outage residents - (see R-R2, R-A2) Outage residents have occupied the onsite full hookup camping facility from January 1, 2004 and are expected to be on site until after December 31, 2004. Dependents and children are permitted in this facility. It is 0.4 miles from Units 2/3 in Sector R. This location is considered a full time residence for all age groups (infant, child, teenager, and adult). The maximum possible occupancy is 8760 hours for 2004. No decommissioning workers resided here in 2004.
3. Outage residents - (see R-R3) Outage residence dry camping (Parking Lot 12) was occupied from January 1 to April 10, 2004 and from August 15, 2004 to November 15, 2004. The maximum possible occupancy is 4608 hours for 2004.
4. The San Clemente Ranch business has been purchased and is under new management. The new owners (Seaview Farms) cultivate 566 acres total of which 80 acres of lettuce are grown in sector Q. This location G-2, (2.2 miles from Units 2/3 midpoint) is now the closest location growing leafy vegetables in Sector Q. No leafy vegetables are grown in Sector R at the Seaview Farms location.
5. Highway Patrol Weigh Station - An additional California Board of Equalization worker was identified during the 2004 LUC. This full time worker splits his time evenly between the Northbound and Southbound weigh stations (see LUC # 31B and LUC #32).
6. San Clemente population is 63,100 as of January 1, 2004.

TABLE F-1
2004 SONGS Units 2/3 LUC Five Mile Radius Summary Sheet

Land Use Sector (22½°)	Nearest Residence (2,000 Hours/Year)		Closest Other Specified Uses			Nearest Meat Animals	
	Location (Miles)	Description (LUC #)	Location (Miles)	Description (LUC #)	Maximum Reported Person Exposure (Hours/Year)	Location (Miles)	Description
West Northwest (P) *	1.0	SORB Host (R-P3)	0.5	Surf Beach (O-6)	667	--	NONE
Northwest (Q) *	1.1	SORB Host (R-Q4) & SORB employee w/infant (R-Q5)	0.6	State Park Office Trailer (O-3)	400	--	NONE
North Northwest (R)	0.4	Camp Mesa (R-R2)	2.6	Seaview Farms Packing (O-7)	3,500	1.8	Hunting (Deer)
North (A)	0.4	Camp Mesa (R-A2)	3.6	Camp San Mateo Motor Pool (O-8)	2,000	1.8	Hunting (Deer)
North Northeast (B)	--	--	2.1	Sanitary Landfill (O-9)	2,000	1.6	Hunting (Deer)
Northeast (C) *	2.4	Camp San Onofre Fire Station (R-C2)	2.2	Camp San Onofre Sewage Treatment Plant (O-10)	2,000	1.0	Hunting (Deer)
East Northeast (D)	3.0	Camp San Onofre (R-D1) Barracks	3.7	Camp Horno Sewage Treatment Plant (O-4)	2,000	2.2	Hunting (Deer)
East (E)	4.1	Camp Horno (R-E1) Barracks	4.0	Camp Horno Motor Pool (O-5)	2,000	1.0	Hunting (Deer)
East Southeast (F)	--	--	0.8	San Onofre State Beach Entr. Guard Shack (O-1)	1,500	1.5	Hunting (Deer)
Southeast (G)	--	--	0.9	San Onofre Beach Campground (O-2)	720	--	NONE

Notes: All distances are in miles from SONGS 2/3 site reference point (midpoint between SONGS Units 2/3 containment buildings). All sectors include 22½° with "A" sector centered on True North. Sectors H, J, K, L, M, and N are oceanward sectors and land uses are not applicable. A "residence" is a location occupied by an individual 2,000 hours or more in a year.

TABLE F-1
2004 SONGS Units 2/3 LUC Five Mile Radius Summary Sheet

Land Use Sector (22½°)	Nearest Leafy Vegetable Garden		Nearest Fleshy Vegetable Garden	
	Location (Miles)	Description (LUC#)	Location (Miles)	Description (LUC#)
West Northwest (P)	2.8	Old Nixon Estate (G-3)	2.8	Old Nixon Estate (G-3)
Northwest (Q)	2.2	Seaview Farms (G-2)	2.2	San Clemente Ranch (G-2)
North Northwest (R)	0.4	SONGS Garden (G-10)	0.4	SONGS Garden (G-10)
North (A)	--	--	--	--
North Northeast (B)	--	--	--	--
Northeast (C)	--	--	--	--
East Northeast (D)	--	--	--	--
East (E)	--	--	--	--
East Southeast (F)	--	--	--	--
Southwest (G)	--	--	--	--

Note: All distances are in miles from SONGS 2/3 site reference point (midpoint between SONGS Units 2/3 containment buildings). All sectors include 22½° with "A" sector centered on True North. Sectors H, J, K, L, M, and N are oceanward sectors and land uses are not applicable. A "residence" is a location occupied by an individual 2,000 hours or more in a year.

TABLE F-2
2004 SONGS Unit 1 Land Use Census Summary Sheet (Five-Mile Radius)

Land Use Sector (22½°)	Nearest Residence (2,000 Hours/Year)		Closest Other Specified Uses			Nearest Meat and Milk Animals (Specify Meat or Milk Producing)	
	Location (Miles)	Description (LUC #)	Location (Miles)	Description (LUC #)	Maximum Reported Person Exposure (Hours/Year)	Location (Miles)	Description
West Northwest (P)(e)	1.3	SORB Host (R-P4)	0.4	Surf Beach (O-6)	667	--	NONE
Northwest (Q) (e)	0.8	SORB Host (R-P3)	0.5	State Park Office Trailer (O-3)	400	--	NONE
North Northwest (R)	1.2	San Onofre Mobile Homes (R-R1)	2.4	San Clemente Ranch Packing (O-7)	3,500	1.6	Hunting (DEER)
North (A) (e)	0.4	Camp Mesa (R-R2)	3.5	Camp San Mateo Motor Pool (O-8)	2,000	1.7	Hunting (DEER)
North Northeast (B) (e)	0.3	Camp Mesa (R-R2)	2.1	Sanitary Landfill (O-9)	2,000	1.6	Hunting (DEER)
Northeast (C) (e)	2.4	Camp San Onofre Fire Station (R-C2)	2.3	Camp San Onofre Sewage Treatment Plant ((O-10)	2,000	1.1	Hunting (DEER)
East Northeast (D)	3.0	Camp San Onofre Barracks (R-D1)	3.8	Camp Horno Sewage Treatment Plant (O-4)	2,000	1.0	Hunting (DEER)
East (E)	4.2	Camp Horno (R-E1)	4.2	Camp Horno Motor Pool (O-5)	2,000	1.0	Hunting (DEER)
East Southeast (F)	--	--	1.0	San Onofre State Beach Entr. (Guard Shack) (O-1)	1,500	1.7	Hunting (DEER)
Southeast (G)	--	--	1.1	San Onofre Beach Campground (O-2)	720	--	NONE

- Notes:
- All distances are in miles from the midpoint of SONGS Unit 1 Plant Vent Stack.
 - All sectors include 22½° with "A" sector centered on True North.
 - A "residence" is a location occupied by an individual 2,000 hours or more in a year.
 - Sectors H, J, K, L, M, and N are oceanward sectors and land uses are not applicable.
 - Denotes change from 2002 Land Use Census.

TABLE F-2
2004 SONGS Unit 1 Land Use Census Summary Sheet (Five-Mile Radius)

Land Use Sector (22½°)	Nearest Leafy Vegetable Garden		Nearest Fleshy Vegetable Garden	
	Location (Miles)	Description (LUC#)	Location (Miles)	Description (LUC#)
West Northwest (P)	2.6	Old Nixon Estate (G-3)	2.6	Old Nixon Estate (G-3)
Northwest (Q)	2.0	Seaview Farms (G-2)	2.0	Seaview Farms (G-2)
North Northwest (R)	--	--	2.1**	Seaview Farms (G-1)
North (A)	--	--	--	--
North Northeast (B)	0.3	SONGS Garden (G-10)	0.3	SONGS Garden (G-10)
Northwest (C)	--	--	--	--
East Northeast (D)	--	--	--	--
East (E)	--	--	--	--
East Southeast (F)	--	--	--	--
Southwest (G)	--	--	--	--

Notes: All distances are in miles from SONGS Unit 1 Plant Vent Stack.
All sectors include 22½° with "A" sector centered on True North.
A "residence" is a location occupied by an individual 2,000 hours or more in a year.

APPENDIX G
FIGURES FOR 2004

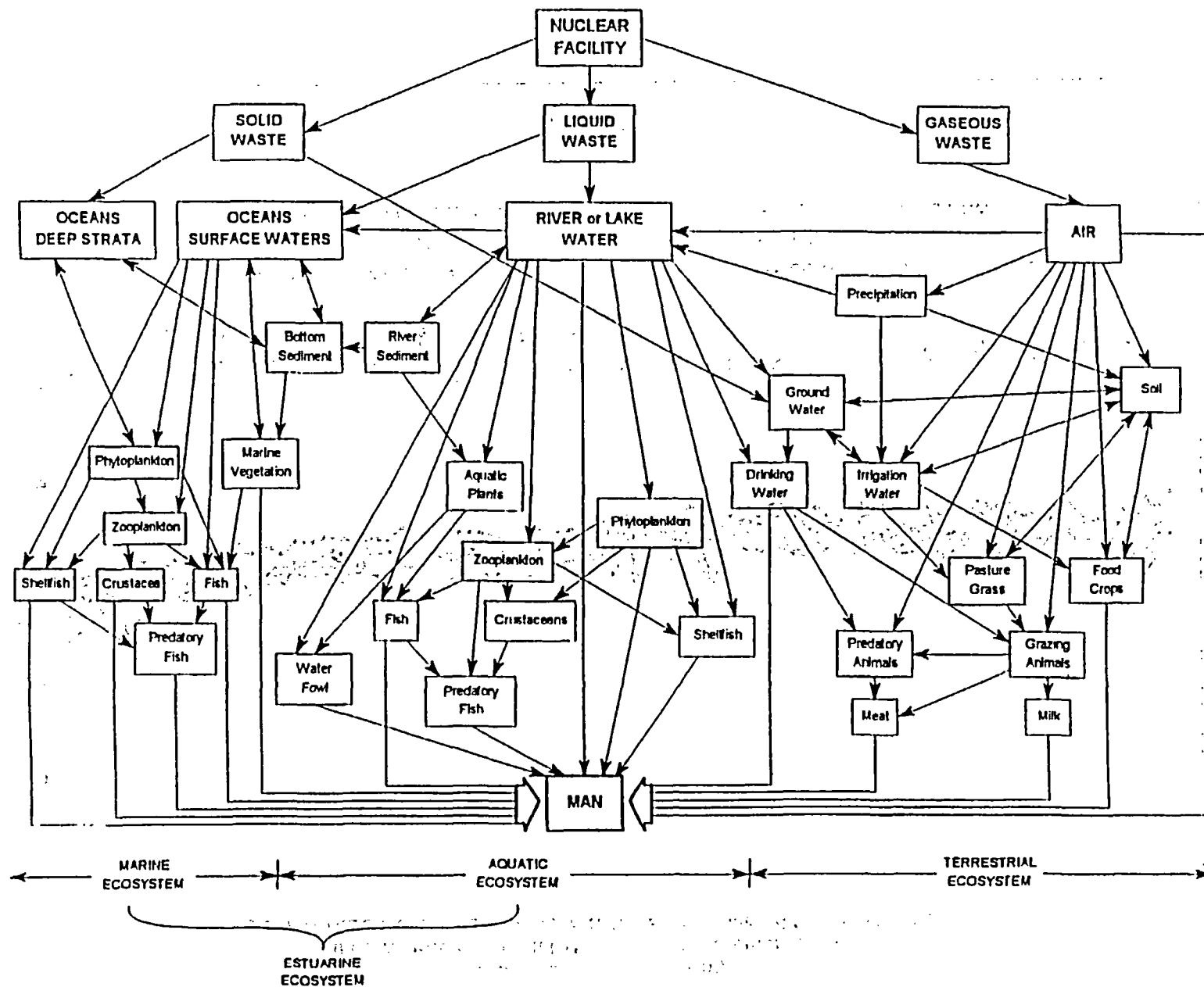


Figure 1. Potential Radiation Exposure Pathways Leading to Man

Direct Radiation Monitoring
Quarterly Environmental TLD dose measurements in mR
Selected TLDs located very close to SONGS vs. Selected CONTROL TLDs

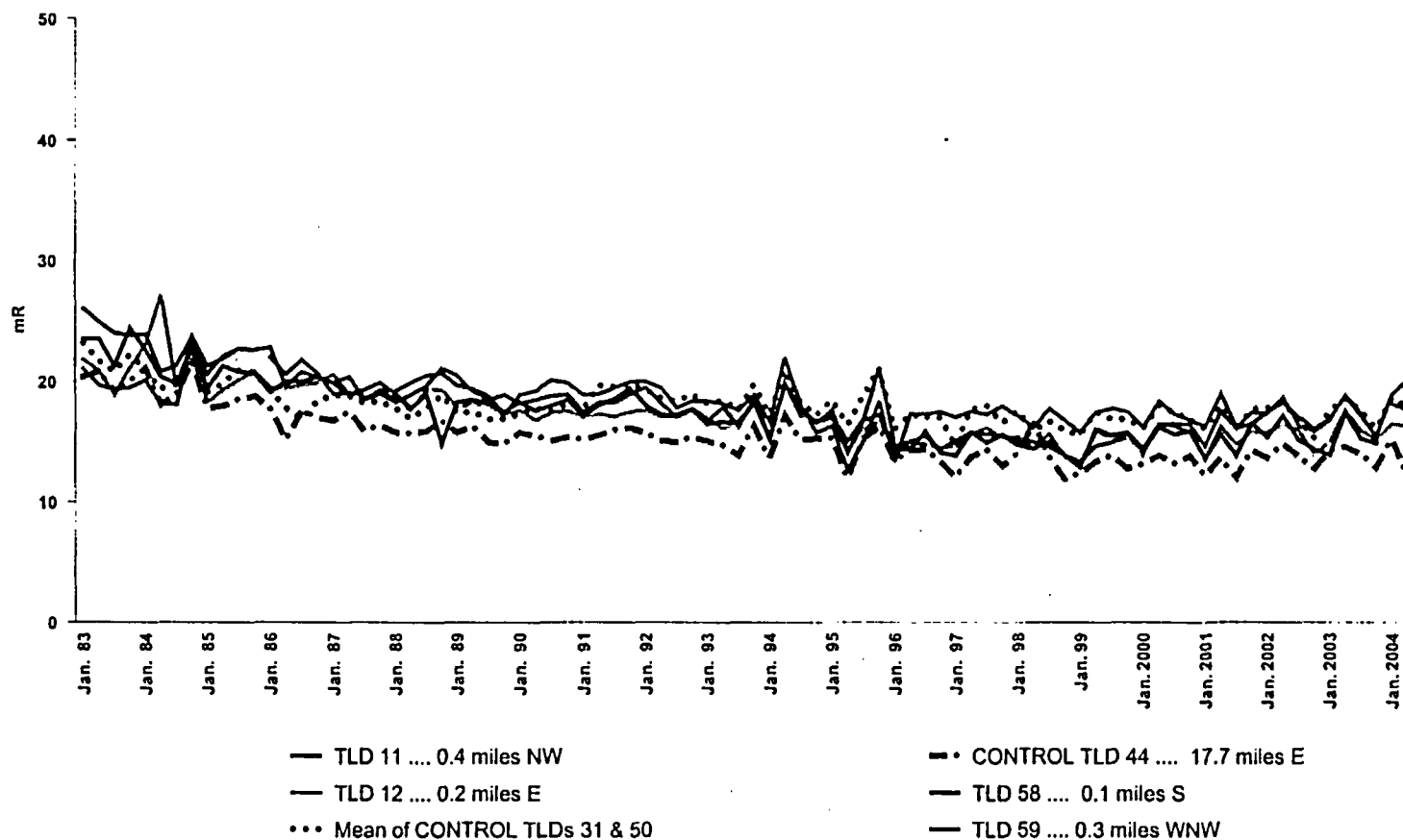


Figure 2A

Direct Radiation Monitoring
Quarterly Environmental TLD dose measurements in mR
Selected Outer Ring locations vs. Selected CONTROL locations

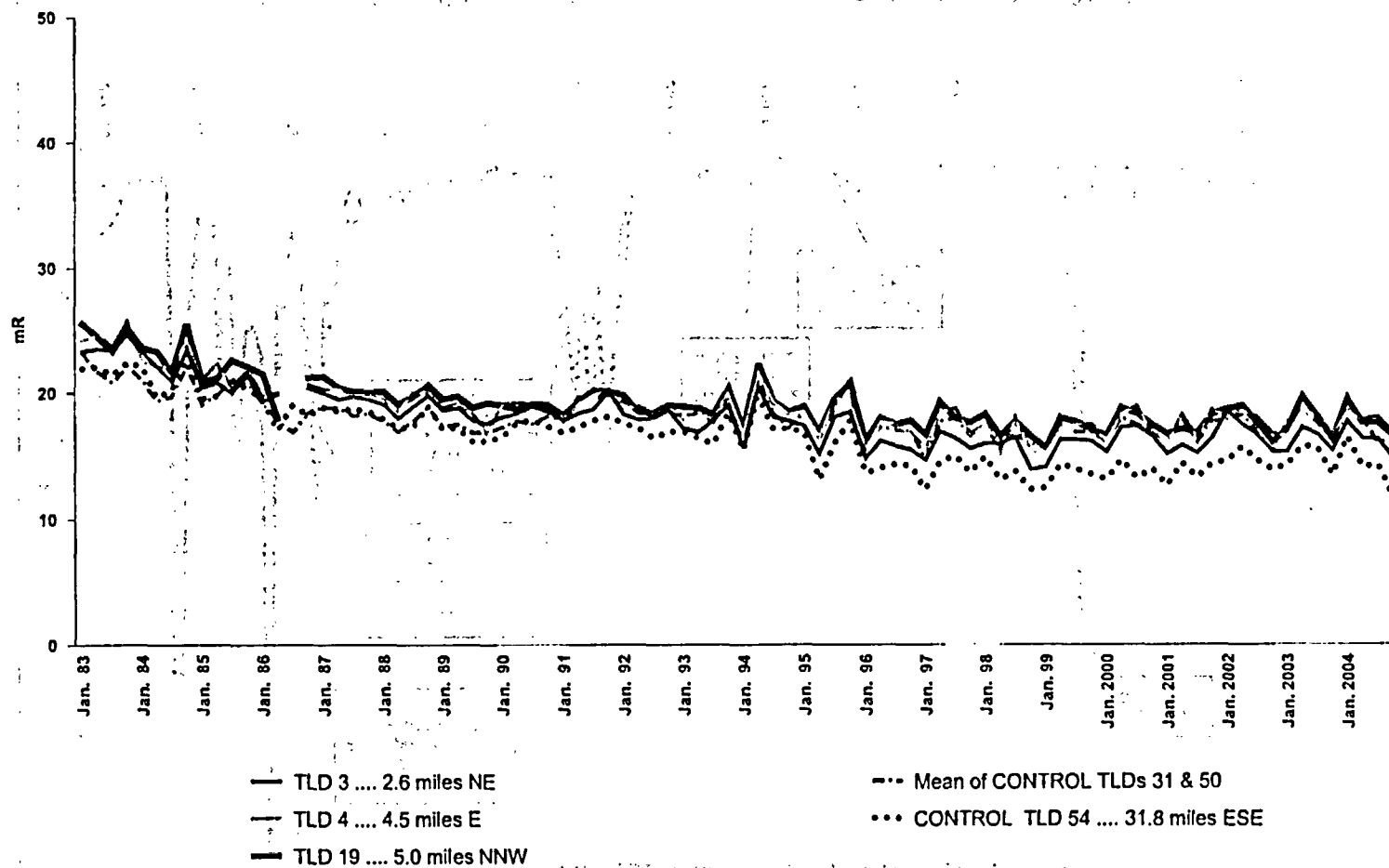
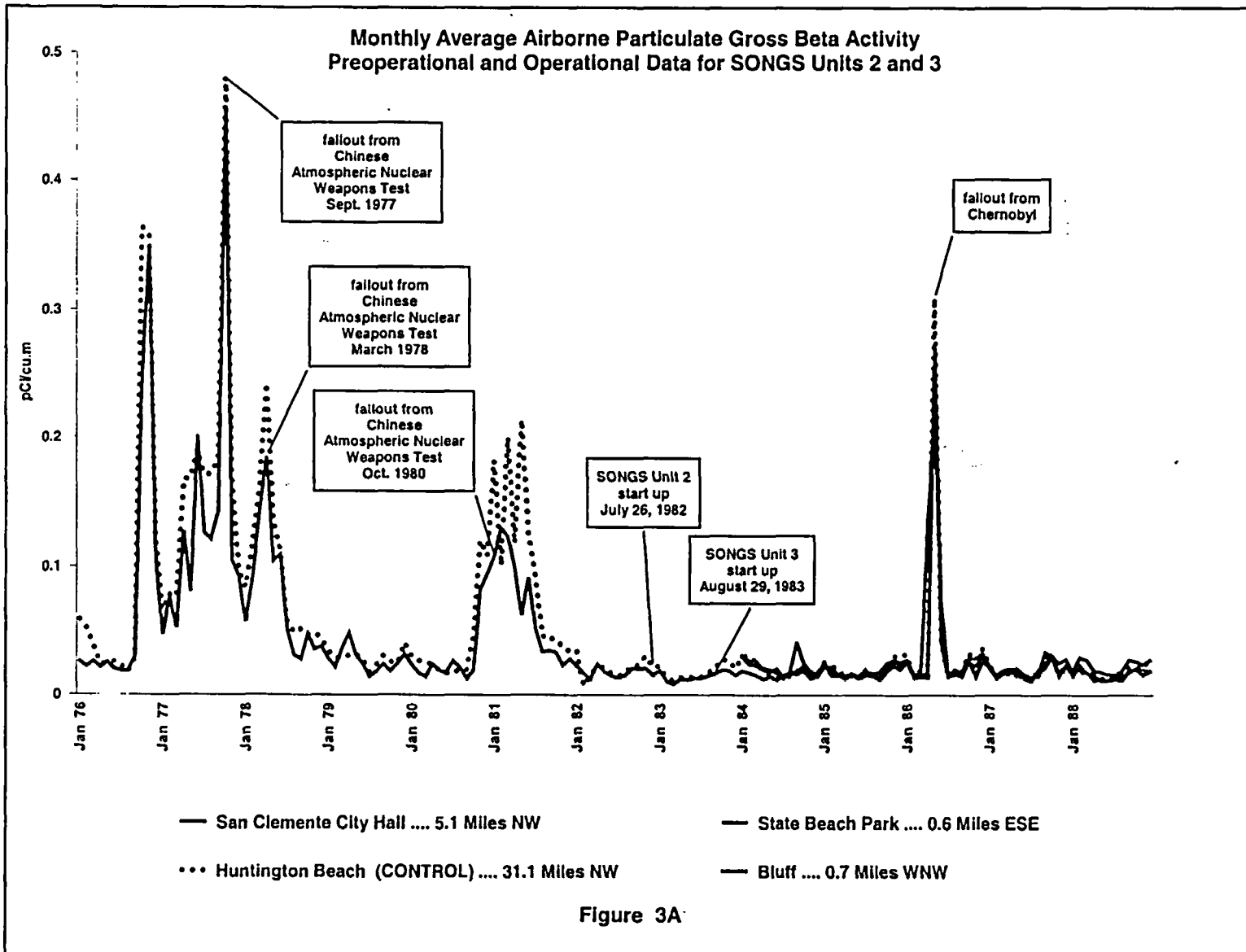


Figure 2B



Monthly Average Airborne Particulates Gross Beta Activity
 SONGS Units 2 and 3 from January 1988 to December 1997 (EXPANDED Scale - 0 to 0.1 pCi/cu.m)

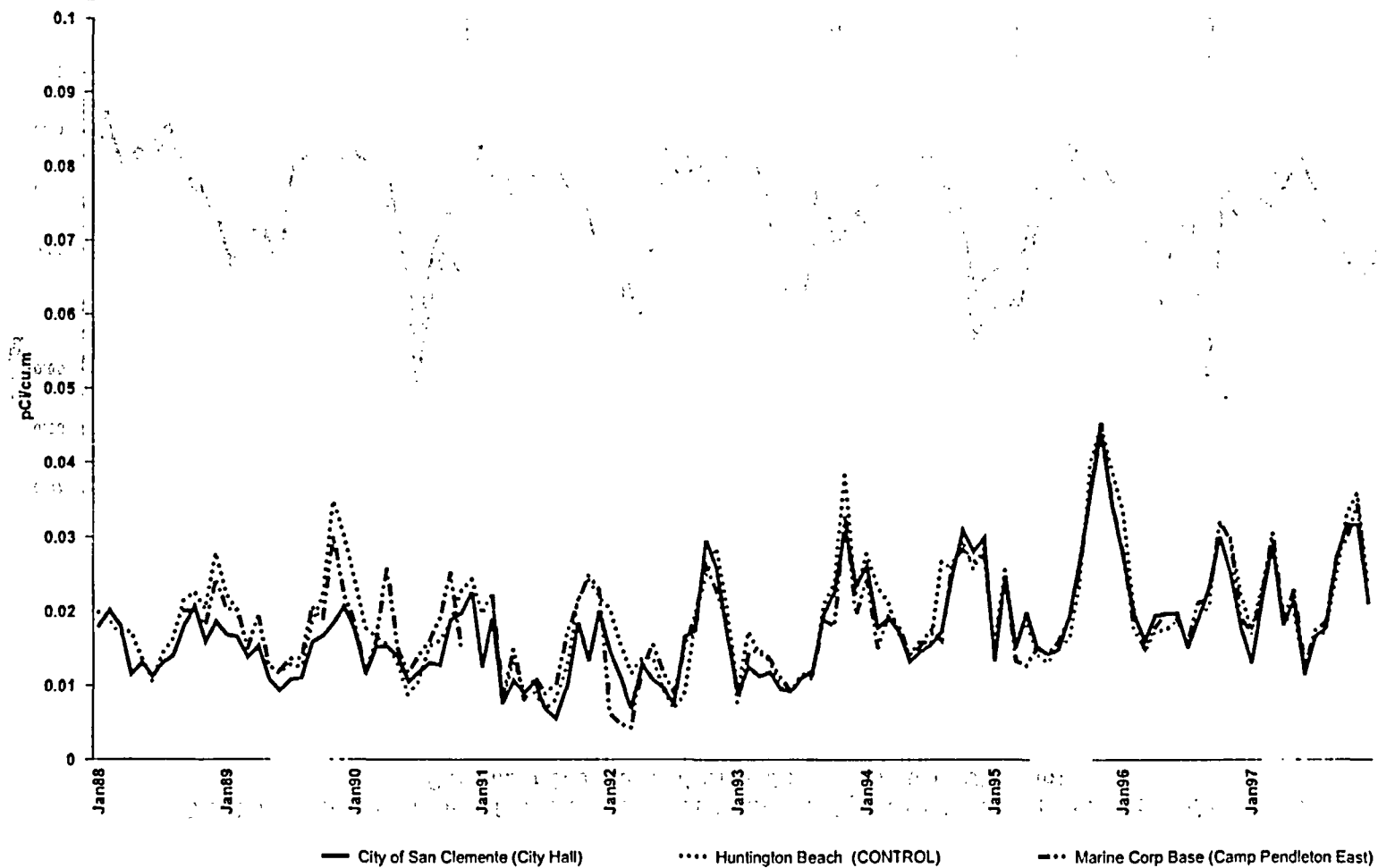


Figure 3B

Monthly Average Airborne Particulates Gross Beta Activity SONGS Units 2 and 3 January 1998 to December 2004 (EXPANDED Scale - 0 to 0.1 pCi/cu. m)

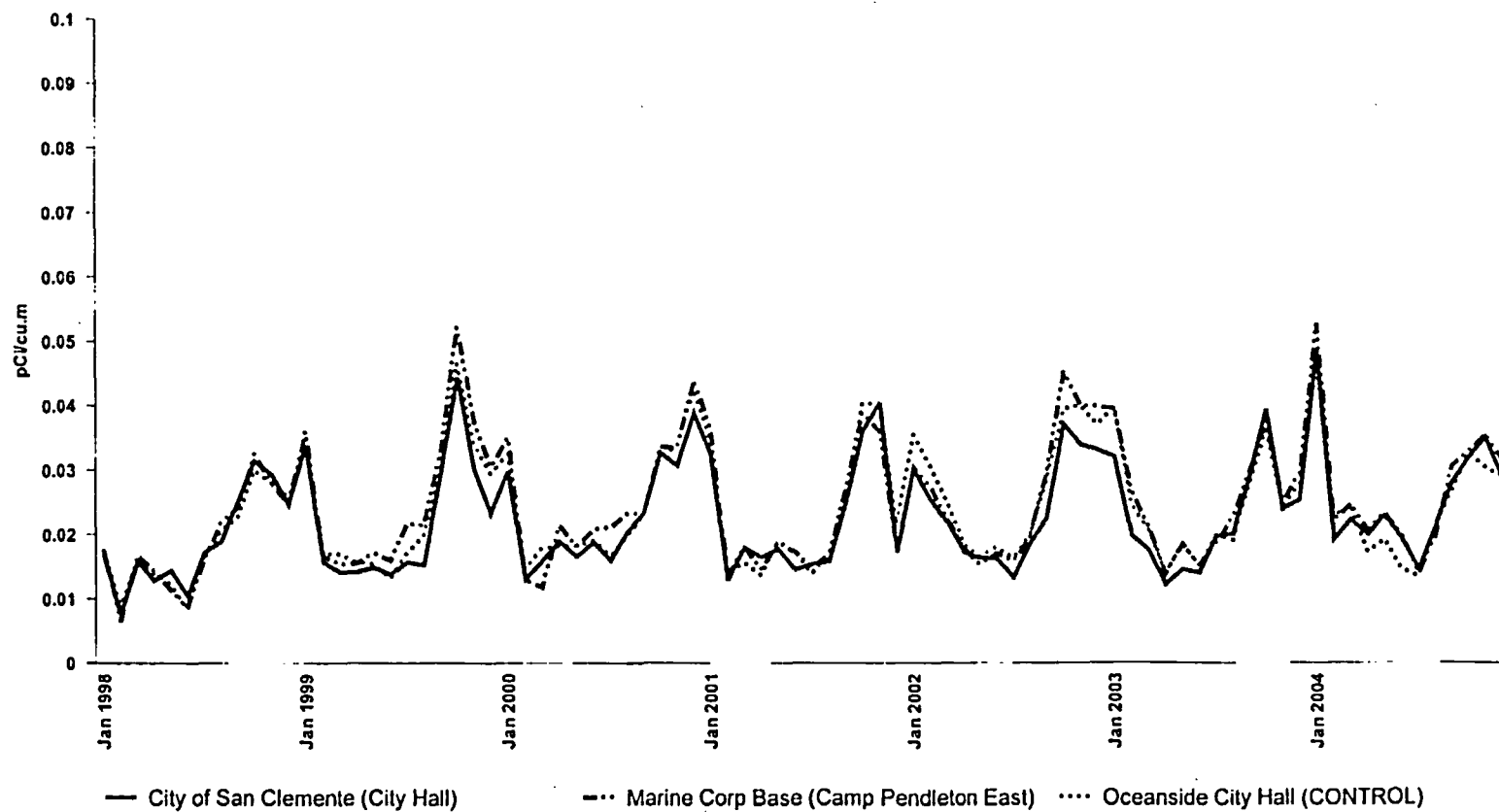


Figure 3C

Weekly Airborne Particulate Gross Beta Activity
SONGS Units 1, 2 and 3 January to December 2004

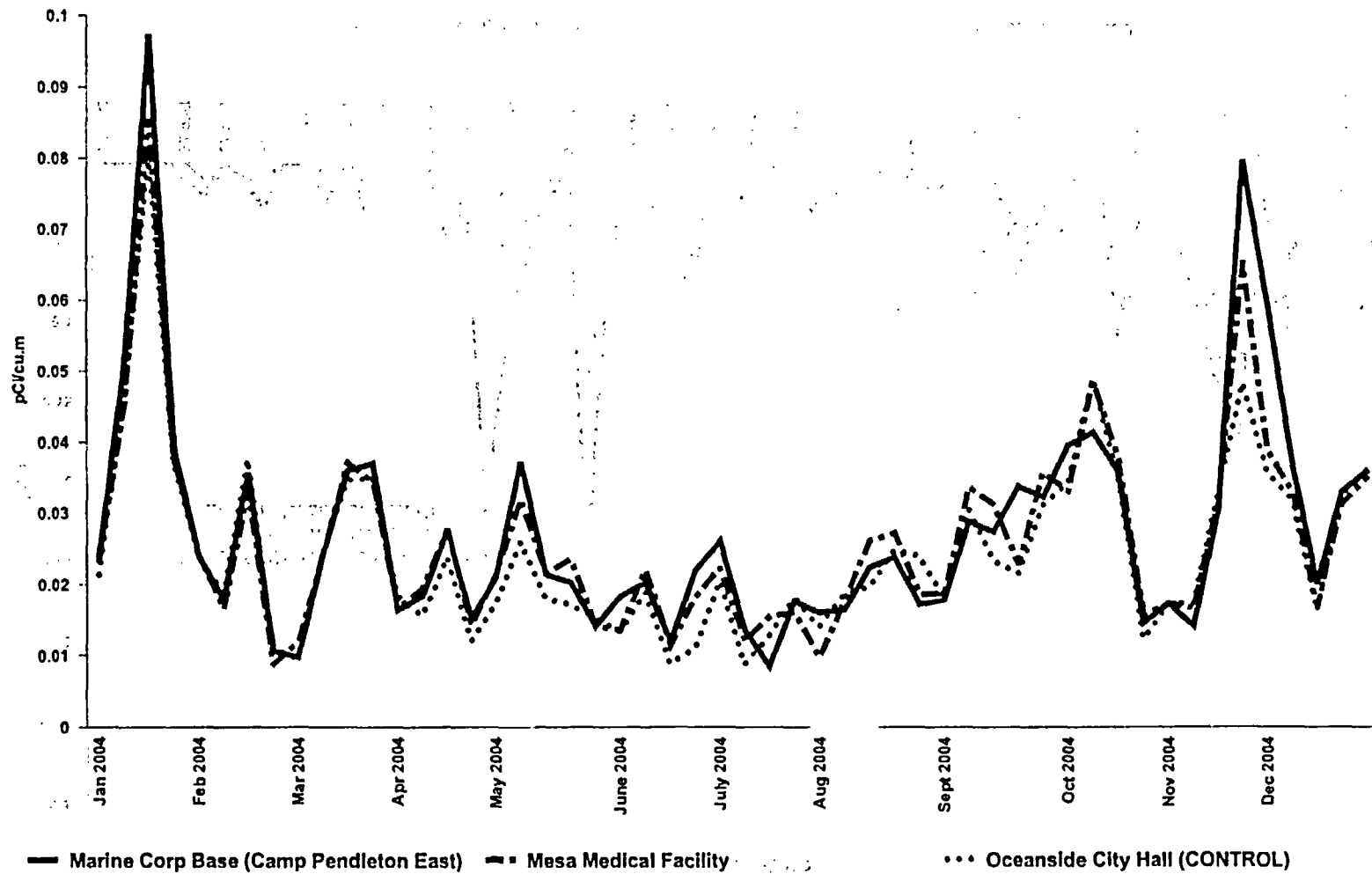


Figure 3D

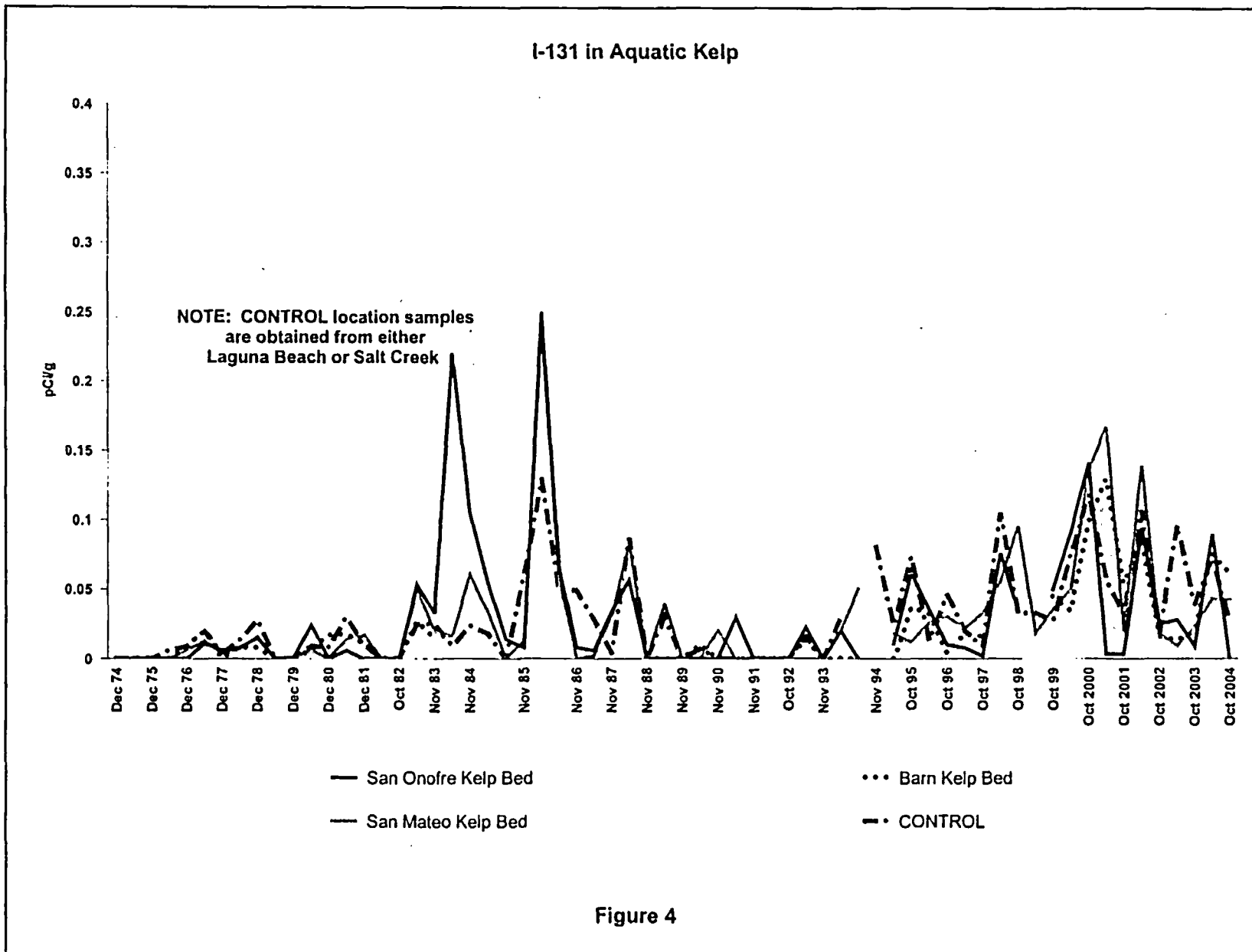


Figure 4

APPENDIX H

ERRATA TO THE 2003 AREOR

All data required by the ODCM in 2003 was reported in the 2003 AREOR. There are no errata to be appended to the 2003 AREOR.

APPENDIX I
REMP TLDs CO-LOCATED WITH DHS TLDs DURING 2004

APPENDIX I

REMP TLDs CO-LOCATED WITH DHS TLDs DURING 2004

Requirements in the standard Technical Specifications adopted under the Technical Specifications Improvement Program include reporting results of those thermoluminescent dosimeters (TLDs) that are co-located with NRC dosimeters. The NRC no longer deploys TLDs in the environs of SONGS. Some SCE TLDs are located adjacent to the former NRC TLD locations and these SCE TLDs are listed below.

The DHS (Department of Health Services) also maintains a TLD program in the environs of SONGS. The DHS direct radiation monitoring program uses Landauer TLDs.

The below listed quarterly TLD data is from the SCE & DHS TLD programs. The NRC location numbers refer to the locations in the old NRC program.

Location Number	Location Name	2004 Data from SCE TLDs			
		1st Qtr	2nd Qtr	3rd Qtr	4th Qtr
SCE -1 , NRC -7, DHS #2	San Clemente	18.73	16.64	17.34	16.05
SCE -2, NRC -23, DHS #8	Camp San Mateo	21.03	18.22	18.19	16.51
SCE -3, NRC -19, DHS #9	Camp San Onofre	17.72	16.33	16.31	14.75
SCE -6, DHS #10	Old Route 101 (East-Southeast)	11.71	10.81	10.91	10.38
SCE 10, NRC -12, DHS #6	San Onofre Surfing Beach				
SCE 16, DHS #7*	ESE Site boundary	19.27	17.62	16.31	15.37
SCE 22, NRC 11, DHS #4	Coast Guard Station	18.52	18.13	17.83	15.85
SCE -34, NRC -14, DHS #5	San Onofre Elementary School	17.41	16.41	15.16	14.91
SCE 41, NRC 25, DHS #11**	Old Route 101 (Unit 3)	16.26	14.45	14.85	13.85
SCE 50, NRC 32, DHS #13	Oceanside Fire Station	17.59	17.6	15.5	15.19

* SCE 16 is approximately 15 meters from DHS 7. DHS 7 is across Basilone Rd.

** SCE 41 is approximately 120 meters from DHS 11. Results included per DHS request.

Appendix J

ISFSI (Independent Spent Fuel Storage Installation) TLD data

ISFSI (Independent Spent Fuel Storage Installation) TLD data

Per 10 CFR 72.126, SONGS implemented an environmental TLD program in the vicinity of the ISFSI. In the fourth quarter of 2001, 21 pre-operational TLDs were deployed in the area around the ISFSI foundation then under construction. The pre-operational TLDs data are compared to the data obtained after the commencement of spent fuel storage in the ISFSI for the purposes of estimating the additional dose potentially attributable to the operation of the ISFSI.

Environmental dose rates are variable. The REMP TLD data show a seasonal variability that does not appear to be related to any activities at SONGS. Data from the REMP indicator and CONTROL TLDs increase and decrease in a synchronous manner. The data support the conclusion that macro-environmental factors are the causative agents for the variations. Refer to Figure 2a and 2b. The ISFSI TLD data gathered to date appears to follow a similar seasonal variability. Refer to Figures 6-1, 6-2, and 7a. In addition to environmental factors some non-ISFSI work activities at Unit 1 have elevated the pre-operational measured ISFSI TLD dose. The storage and transport of radioactive materials and waste near the location of the ISFSI foundation area in 2001 and 2002 appears to have elevated the dose rates of TLDs 306 to 315. In addition, the removal of the Unit 1 reactor vessel in October 2002 caused a noticeable increase in the measured dose for TLDs 301 to 315. Refer to Tables J-1 and J-2 which list all the REMP and ISFSI TLD data within the 10 CFR 72 Controlled Area Boundary and the 10 CFR 50 EAB (Exclusion Area Boundary).

The TLDs close to the ISFSI foundation (TLDs 306 to 315) all showed a decrease in measured dose after the commencement of spent fuel storage in the ISFSI. Refer to Table J-1. This decrease in measured dose may be attributable to the aforementioned seasonal variability of environmental dose rates or it may be attributable to the decrease in non-ISFSI radioactive material work activity in the Unit 1 area.

In the first quarter 2004, 3 TLDs were placed on the perimeter fence 15 meters SW of the ISFSI module. These TLDs (336, 337, and 338) showed the highest measured dose in 2004. The closest publicly accessible location SW of the ISFSI is the San Onofre Beach access road. The TLDs located along the access road measured a dose indistinguishable from background in 2004.

We conclude that dose attributable to the storage of spent fuel in the ISFSI is not measurable beyond the immediate area of the ISFSI and is well below regulatory limits. We further conclude that dose to a member of the general public attributable to all SONGS related radiological activities at the EAB is below 10 CFR 72.104 limits.

**TABLE J-1
ISFSI TLD DATA**

ISFSI TLD Number Location	2001	2002				2003				2004			
	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr (1)	1 st Qtr	2 nd Qtr	3 rd Qtr (2)	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
TLD 301 (3)	17.3	18.42	17.91	18.51	24.56	17.23	18.47	17.09	17.39	18.86	18.0	17.7	15.49
TLD 302 (3)	20.28	20.67	19.59	19.46	125.78	20.32	20.77	19.3	21.97	23.57	26.37	20.02	19.11
TLD 303 (3)	18.96	18.82	18.26	18.11	156.89	20.45	25.74	26.56	27.06	28.54	29.98	24.59	24.72
TLD 304 (3)	18.06	19.1	18.28	17.95	64.53	19.57	28.34	33.25	31.8	34.72	33.22	29.74	28.44
TLD 305 (3)	18.99	20.49	19.68	19.82	147.33								
TLD 306 (3)	17.23	18.56	16.91	17.07	29.6	19.03	19.75	17.3	17.27	18.85	17.31	15.7	16.08
TLD 307 (3)	17.34	19.61	17.68	17.36	23.35	24.07	20.3	16.24	16.82	18.07	17.62	15.53	15.11
TLD 308 (3)	18.75	20.11	18.9	18.68	27.22	21.82	21.31	18.35	18.73	20.55	21.72	18.11	15.82
TLD 309 (3)	18.74	23.09	23.43	24.43	30.53	21.78	20.49	18.44	16.85	20.15	21.44	18.72	17.34
TLD 310 (3)	19.79	25.82	23.47	21.49	25.8	20.74	19.05	18.96	17.59	21.17	21.28	18.19	17.15
TLD 311 (3)	21.29	29.93	25.33	26.43	26.61	25.24	23.59	21.8	19.99	19.06	20.43	18.04	17.52
TLD 312 (3)	21.86	34.08	28.45	30.07	26.45	28.46	27.71	19.88	16.15	15.5	13.87	15.23	13.35
TLD 313 (3)	24.95	36.84	28.78	26.49	25.44	25.78	26.34	25.6	23.4	22.87	21.14	20.68	20.0
TLD 314 (3)	20.67	22.28	20.15	19.58	18.8	19.74	20.23	19.3	19.85	18.84	19.06	17.68	15.83
TLD 315 (3)	23.37	25.7	22.77	22.58	20.82	24.06	23.18	22.77	21.49	20.89	21.36	19.26	18.13
TLD 316 (4)	16.96	18.81	17.83	16.29	18.01	16.72	17.76	16.01	14.97	16.68	19.06	15.15	14.45
TLD 317 (4)	18.07	19.87	20.62	17.95	18.43	16.86	18.82	17.12	16.02	17.41	17.51	16.96	14.94

(1) Large Component Removal and start of the long term storage of the Unit 1 Reactor Vessel.

(2) Fuel loaded into the ISFSI pad September 2003.

(3) These TLDs are in an area where radiological materials have been stored or transported.

(4) These TLDs are not in the proximity of radiological activities.

**TABLE J-1
ISFSI TLD DATA**

ISFSI TLD Number Location	2001	2002				2003				2004			
	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr (1)	1 st Qtr	2 nd Qtr	3 rd Qtr (2)	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
TLD 318 (4)	17.86	18.91	19.59	18.4	18.3	17.62	19.01	17.72	16.95	18.15	18.31	16.34	16.37
TLD 319 (4)	17.78	19.76	20.01	19.02	18.35	19.14	19.54	18.57	15.88	17.22	19.19	16.48	16.54
TLD 320 (4)	17.83	19.39	19.11	18.34	18.25	17.78	19.41	17.8	16.94	16.36	19.18	16.34	15.93
TLD 321 (4)	18.52	19.84	20.45	18.67	19.41	19.83	21.1	18.46	17.82	18.89	20.8	16.92	15.5
TLD 336										27.09	31.35	30.77	24.63
TLD 337										24.00	49.65	65.77	47.51
TLD 338										33.79	38.84	36.06	30.27

- (1) Large Component Removal and start of the long term storage of the Unit 1 Reactor Vessel.
 (2) Fuel loaded into the ISFSI pad September 2003.
 (3) These TLDs are in an area where radiological materials have been stored or transported.
 (4) These TLDs are not in the proximity of radiological activities.

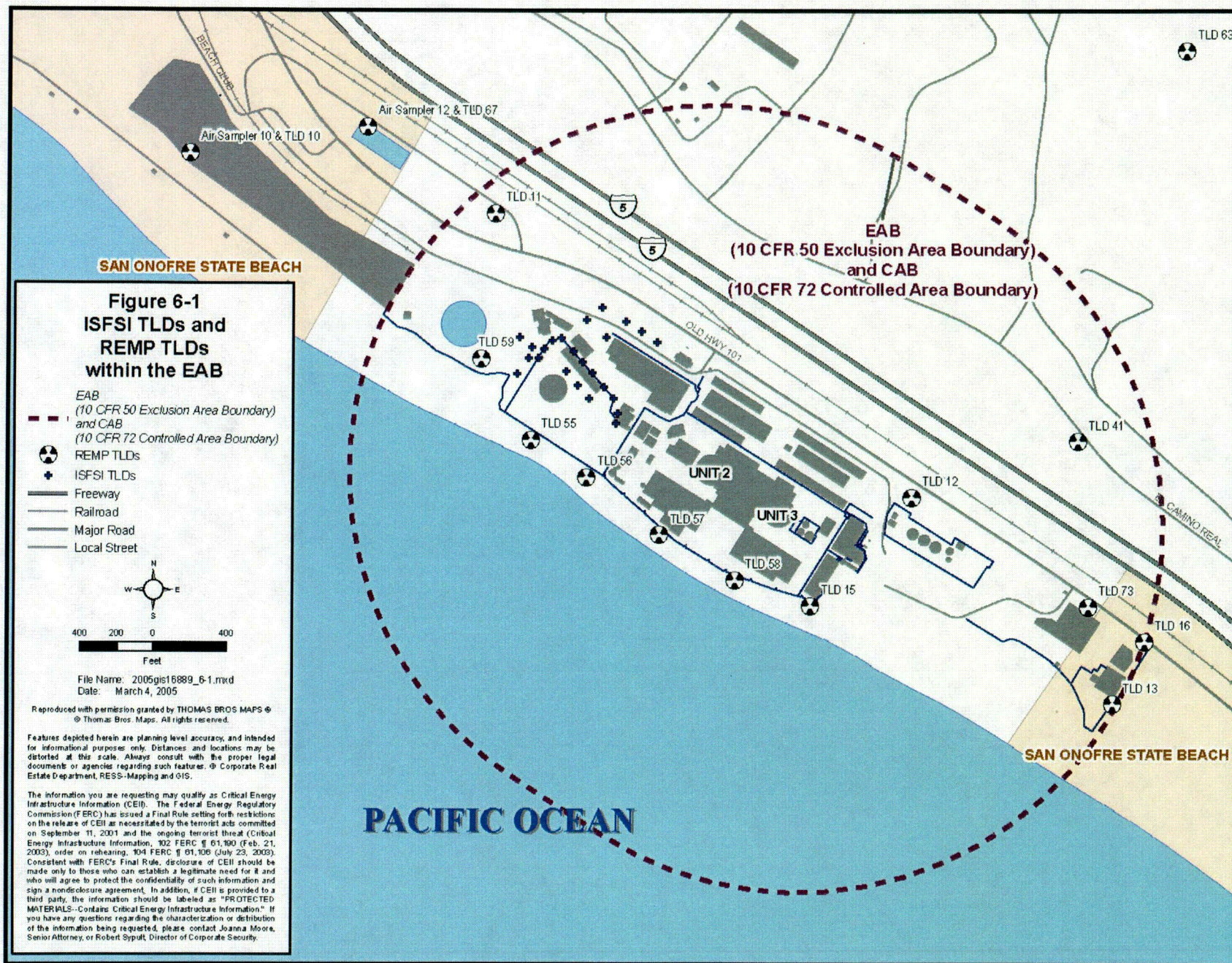
TABLE J-2
REMP TLDs WITHIN THE EAB

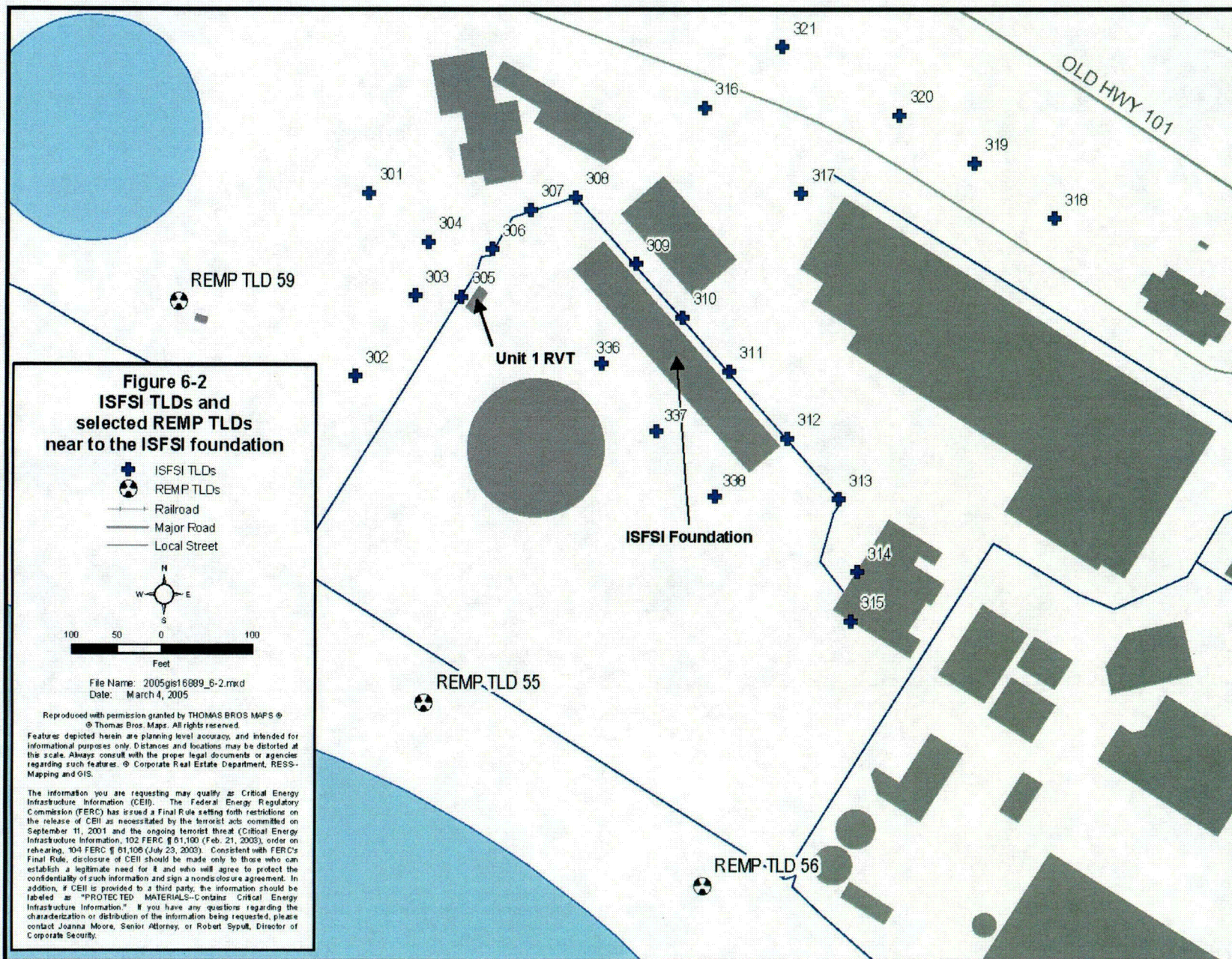
ISFSI TLD Number Location	2001				2002				2003				2004			
	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr (1)	1 st Qtr	2 nd Qtr	3 rd Qtr (2)	4 th Qtr	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
11	13.61	15.63	13.89	16.57	15.39	17.2	15.17	14.38	13.89	17.43	15.29	14.93	16.02	15.35	15.52	14.26
12	13.59	16.28	14.81	15.79	15.75	16.4	16.01	13.93	14.96	17.64	16.04	15.19	16.49	16.25	15.01	14.22
13	28.13	33.16	38.84	31.06	31.03	37.64	38.2	22.62	27.26	28.38	33.11	21.08	21.67	20.34	22.45	22.84
15	15.63	18.37	16.07	17.76	17.32	20.82	16.79	15.63	16.52	19.11	15.44	16.36	17.37	16.23	19.52	16.95
16	17.46	18.16	19.61	17.66	17.14	18.25	17.91	13.61	15.04	18.48	17.77	15.53	19.27	17.62	16.31	15.37
41	13.51	16.47	14.3	14.63	15.24	17.41	15.13	13.32	15.98	16.41	14.32	15.03	16.26	14.45	14.85	13.85
55	17.11	19.37	15.93	18.98	20.11	19.89	17.67	17.84	18.08	19.86	18.04	18.2	20.06	16.67	18.67	16.72
56	16.39	19.17	15.57	18.77	18.11	20.12	17.31	17.05	17.84	19.71	17.11	17.26	19.12	17.63	17.63	16.69
57	15.88	18.51	16.29	19.19	17.96	19.09	16.03	15.8	16.18	17.44	16.69	15.85	17.8	16.64	15.56	16.69
58	16.29	18.97	16.22	17.45	17.4	18.65	16.39	15.88	16.75	18.94	17.39	(3)	18.17	17.66	18.08	15.88
59	14.65	17.56	16.14	16.54	17.45	18.31	17.12	16.11	16.88	18.79	17.23	15.51	19.0	20.07	18.18	17.08
73	22.97	25.29	22.41	22.71	22.94	23.48	24.9	21.47	22.1	23.91	22.53	22.47	23.02	22.02	23.64	20.67

(1) Large Component Removal and the start of the long term storage of the Unit 1 Reactor Vessel.

(2) Spent Fuel Storage started at the ISFSI

(3) TLD damaged; no data available.





Direct Radiation Monitoring **ISFSI & Selected REMP TLDs - Quarterly Gamma Exposure (mR/ std quarter)**

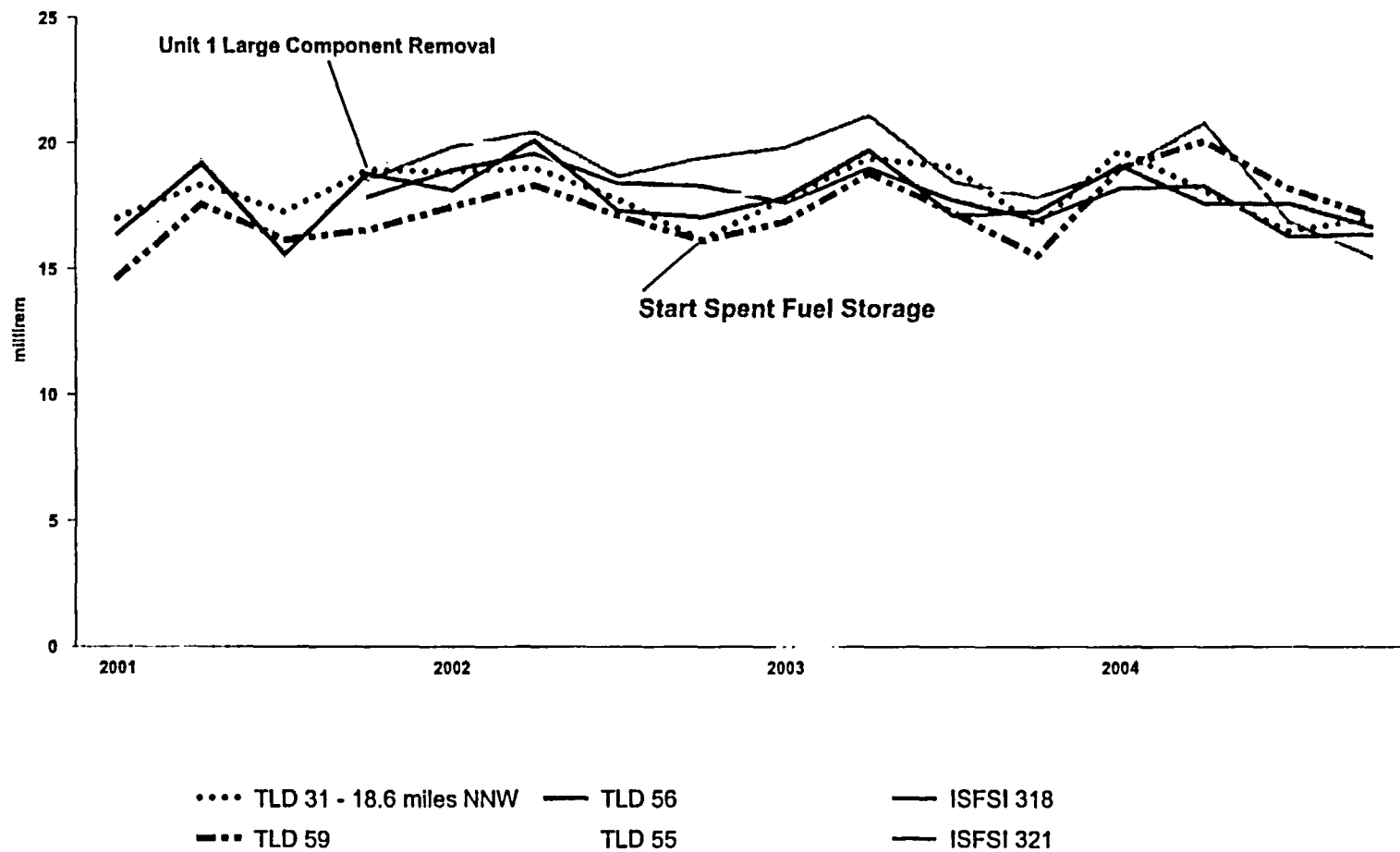


Figure 7A