



Entergy Nuclear Northeast
Entergy Nuclear Operations, Inc.
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April 28, 2005
JAFP-05-0062

T.A. Sullivan
Site Vice President - JAF

United States Nuclear
Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

ATTENTION: Mr. Samuel Collins
Regional Administrator

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT
DOCKET NO. 50-333, LICENSE NO. DPR-59

Gentlemen:

Attached is the Annual Radioactive Effluent Release Report for the period of January 1, 2004 through December 31, 2004. This report is submitted in accordance with the requirements of the James A. FitzPatrick Nuclear Power Plant Offsite Dose Calculation Manual, Part 1, Radiological Effluent Controls, Section 6.2.

This report includes, as an Addendum, an Assessment of the Radiation Doses to the public due to the radioactive liquid and gaseous effluents released during the 2004 calendar year. The format used for the effluent data is outlined in Appendix B of Regulatory Guide 1.21, Revision 1. Distribution is in accordance with Regulatory Guide 10.1, Revision 4.

If you have any questions concerning the attached report, please contact Crystal A. Boucher, Chemistry Superintendent, at the James A. FitzPatrick Nuclear Power Plant at (315)349-6748.

Very truly yours,

T.A. SULLIVAN

SITE VICE PRESIDENT - JAF

TAS/CAB/jbh

Attachments

Xc: Document Control Desk (USNRC)
D. Sherman (ANI Library)
B. O'Grady (ENOC/WPO)
C. Faison (ENOC/WPO)
J. McCann (ENOC/WPO)

K. Mulligan
P. Merges (NYSDEC)
T. Kurtz (NMPC)
J. Furfaro (ENOC/WPO)
W. Hamblin (CHEM/JAF)

NRC Resident Inspector

ENTERGY NUCLEAR OPERATIONS, INC.
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

JANUARY 1, 2004 - DECEMBER 31, 2004

DOCKET NO.: 50-333

LICENSE NO.: DPR-59

ENTERGY NUCLEAR OPERATIONS, INC.
JAMES A. FITZPATRICK NUCLEAR POWER PLANT
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JANUARY 2004-DECEMBER 2004

SUPPLEMENTAL INFORMATION

FACILITY: JAFNPP **LICENSEE:** ENTERGY NUCLEAR OPERATIONS, INC.

1. Offsite Dose Calculation Manual Part 1 Radiological Effluent Controls

a. Fission and Activation Gases:

- (1) The dose rate at or beyond the site boundary due to radioactive materials released from the plant in gaseous effluent shall be limited as follows:
 - (a) Less than or equal to 500 mrem/year to the whole body and less than or equal to 3000 mrem/year to the skin from noble gases.
- (2) The air dose to areas at or beyond the site boundary from noble gases released from the plant in gaseous effluent shall be limited:
 - (a) During any calendar quarter, to less than or equal to 5 mrad from gamma radiation, and less than or equal to 10 mrad from beta radiation; and,
 - (b) During any calendar year, to less than or equal to 10 mrad from gamma radiation and less than or equal to 20 mrad from beta radiation.

b. Tritium, Iodines and Particulates, Half Lives > 8 days:

- (1) The dose to a member of the public at or beyond the site boundary from Iodine-131, Iodine-133, Tritium, and radionuclides in particulate form with half-lives greater than 8 days released from the plant in gaseous effluent shall be limited:
 - (a) During any calendar quarter to less than or equal to 7.5 mrem to any organ; and,
 - (b) During any calendar year to less than or equal to 15 mrem to any organ.
 - (c) Less than 0.1% of the limits of Specification 3.4.1.c.1.a and 3.4.1.c.1.b as a result of burning contaminated oil.
- (2) The dose rate at or beyond the site boundary due to radioactive materials released from the plant in gaseous effluents shall be limited as follows:
 - (a) Less than or equal to 1500 mrem/year to any organ from Iodine-131, Iodine-133, Tritium and for radioactive materials in particulate form with half-lives greater than 8 days (inhalation pathway only).

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SUPPLEMENTAL INFORMATION (continued)

c. Liquid Effluents:

- (1) The concentration of radioactive materials released to the unrestricted areas shall not exceed ten times the values specified in 10 CFR 20.1001-20.2402, Appendix B, Table 2, Column 2. For dissolved or entrained noble gases the concentration shall be limited to 2.00E-04 $\mu\text{Ci/ml}$.
- (2) The dose to a member of the public from radioactive materials released from the plant in liquid effluents to unrestricted areas shall be limited as follows:
 - (a) During any calendar quarter, limited to less than or equal to 1.5 mrem to the whole body and to less than or equal to 5 mrem to any organ; and,
 - (b) During any calendar year, limited to less than or equal to 3 mrem to the whole body and to less than or equal to 10 mrem to any organ.

2. 10X Effluent Concentrations

- a. Fission and activation gases: (None specified)
- b. Iodines: (None specified)
- c. Particulates, half-lives >8 days: (None specified)

d. Liquid effluents:	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
(1) Fission and activation products (mixture EC) ($\mu\text{Ci/ml}$)	None	None	None	None
(2) Tritium ($\mu\text{Ci/ml}$)	1.00E-02	1.00E-02	1.00E-02	1.00E-02
(3) Dissolved and entrained gases ($\mu\text{Ci/ml}$)	2.00E-04	2.00E-04	2.00E-04	2.00E-04

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SUPPLEMENTAL INFORMATION (continued)

3. Average Energy

(None specified)

4. Measurements and Approximations of Total Radioactivity

- a. Fission and Activation Gases: Continuous monitor on each release path calibrated to a marinelli grab sample analyzed by gamma spectroscopy; bubbler grab sample analyzed for Tritium.
- b. Iodines: Gamma spectral analysis of charcoal cartridge and particulate filter on each release path.
- c. Particulates: Gamma spectral analysis of each particulate filter and charcoal cartridge for each release path. A four week per quarter composite of particulate filters for each release path for Strontium-89 and Strontium-90. One week per month particulate filter for each release path for gross alpha.
- d. Liquid Effluents: Gamma spectral analysis of each batch discharged, except composite analysis for Strontium-89, Strontium-90, Iron-55, Tritium, and Alpha.
- e. Solid Waste: Gamma spectral analysis of a representative sample of each waste shipment. Scaling factors established from off-site composite sample analyses to estimate concentration of non-gamma emitters. Low activity trash shipments, curie content estimated by dose rate measurement and application of appropriate scaling factors.
- f. Error Estimation Method: Overall error for sampling and analysis estimated by combining individual errors using error propagation methods. This process is composed of determinate and undeterminate errors.

Determinate - Pump flowrates, volume measurements and analysis collection yields

Undeterminate - Random counting error estimated using accepted statistical calculations

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SUPPLEMENTAL INFORMATION (continued)

5. Batch Releases

a. <u>Liquid: Canal</u>	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
(1) Number of batch releases:	4.00E+00	9.00E+00	1.40E+01	5.00E+00
(2) Total time period for batch release: (min)	8.60E+01	3.56E+02	2.80E+02	1.25E+02
(3) Maximum time period for batch release: (min)	4.50E+01	8.70E+01	6.00E+01	3.90E+01
(4) Average time period for batch release: (min)	2.15E+01	3.96E+01	2.00E+01	2.50E+01
(5) Minimum time period for batch release: (min)	3.00E+00	4.00E+00	1.00E+00	4.00E+00
(6) Total Activity Released (Ci)	4.28E-05	6.14E-04	2.56E-04	3.03E-05
(7) Total Volume Released (liters)	4.20E+03	1.05E+05	2.64E+04	7.97E+03
b. <u>Liquid: Non-Canal</u>				
(1) Number of batch releases:	1.00E+00	1.00E+00	1.00E+01	1.20E+01
(2) Total time period for batch release: (min)	1.09E+02	2.46E+02	1.73E+03	4.38E+04
(3) Maximum time period for batch release: (min)	1.09E+02	2.46E+02	7.08E+02	4.18E+04
(4) Average time period for batch release: (min)	1.09E+02	2.46E+02	1.73E+02	3.65E+03
(5) Minimum time period for batch release: (min)	1.09E+02	2.46E+02	4.00E+00	1.00E+00
(6) Total Activity Released (Ci)	3.35E-05	3.30E-04	1.59E-03	2.16E-03
(7) Total Volume Released (liters)	4.13E+04	9.31E+04	6.52E+05	2.24E+06

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c. Gaseous:

There were no gaseous batch releases for this report period.

6. Abnormal Releases

a. Liquid:	<u>Quarter 1</u>	<u>Quarter 2</u>	<u>Quarter 3</u>	<u>Quarter 4</u>
(1) Number of releases:	NONE	NONE	NONE	NONE
(2) Total activity released:	NONE	NONE	NONE	NONE
b. Gaseous				
(1) Number of releases:	NONE	NONE	NONE	NONE
(2) Total activity released:	NONE	NONE	NONE	NONE

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TABLE 1A
GASEOUS EFFLUENTS--SUMMATION OF ALL RELEASES

	<u>UNIT</u>	<u>QTR 1</u>	<u>QTR 2</u>	<u>QTR 3</u>	<u>QTR 4</u>	<u>EST TOTAL ERROR %</u>
A. FISSION AND ACTIVATION GASES						
1. Total Release	Ci	7.16E+01	1.24E+02	5.36E+02	2.34E+02	≤2.50E+01
2. Average release rate for period	μCi/sec	9.11E+00	1.58E+01	6.75E+01	2.94E+01	
3. Applicable ODCM Limit	%	*	*	*	*	
B. IODINE-131						
1. Total Iodine-131	Ci	3.75E-04	2.95E-04	3.25E-03	1.51E-03	≤2.50E+01
2. Average release rate for period	μCi/sec	4.77E-05	3.75E-05	4.10E-04	1.89E-04	
3. Applicable ODCM Limit	%	*	*	*	*	
C. PARTICULATES						
1. Particulates with half-lives >8 days	Ci	2.42E-04	2.23E-04	3.82E-04	6.24E-04	≤3.60E+01
2. Average release rate for period	μCi/sec	3.08E-05	2.84E-05	4.81E-05	7.85E-05	
3. Applicable ODCM Limit	%	*	*	*	*	
4. Gross alpha radioactivity	Ci	1.49E-07	4.75E-07	2.95E-07	1.00E-06	≤2.50E+01
D. TRITIUM						
1. Total Release	Ci	3.54E+00	3.71E+00	6.27E+00	3.57E+00	≤2.50E+01
2. Average release rate for period	μCi/sec	4.50E-01	4.72E-01	7.89E-01	4.49E-01	
3. Applicable ODCM Limit	%	*	*	*	*	
*E. PERCENT OF APPLICABLE ODCM LIMITS						
FISSION AND ACTIVATION GASES						
1. Quarterly gamma air dose limit	%	1.28E-02	3.33E-02	1.67E-01	1.11E-01	
2. Quarterly beta air dose limit	%	1.09E-03	5.18E-03	3.11E-02	2.06E-02	
3. Yearly gamma air dose limit	%	6.41E-03	1.67E-02	8.34E-02	5.54E-02	
4. Yearly beta air dose limit	%	5.43E-04	2.59E-03	1.55E-02	1.03E-02	
5. Whole body dose rate limit	%	2.43E-03	4.59E-03	2.68E-02	7.87E-02	
6. Skin dose rate limit	%	4.98E-04	1.08E-03	5.54E-03	1.78E-02	
HALOGENS, TRITIUM AND PARTICULATES WITH HALF-LIVES >8 DAYS						
7. Quarterly dose limit (organ)	%	7.15E-02	5.68E-02	5.85E-01	2.64E-01	
8. Yearly dose limit (organ)	%	3.58E-02	2.84E-02	2.93E-01	1.32E-01	
9. Organ dose rate limit	%	9.73E-05	3.15E-05	8.40E-04	8.40E-04	

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TABLE 1B
GASEOUS EFFLUENTS--ELEVATED RELEASE

<u>NUCLIDES RELEASED</u>	<u>UNIT</u>	<u>QUARTER 1</u>	<u>CONTINUOUS MODE</u>			<u>QUARTER 4</u>
			<u>QUARTER 2</u>	<u>QUARTER 3</u>		
1. <u>Fission Gases</u>						
Argon-41	Ci	3.55E+00	4.01E+00	2.04E+00		1.74E+00
Krypton-85m	Ci	1.18E+01	2.82E+01	1.09E+02		5.32E+01
Krypton-87	Ci	1.05E-01	5.53E-01	6.69E+00		1.33E+01
Krypton-88	Ci	6.94E+00	2.15E+01	1.21E+02		6.84E+01
Xenon-133	Ci	4.83E+01	5.60E+01	1.85E+02		1.19E+01
Xenon-133m	Ci	-----	-----	1.43E+00		-----
Xenon-135	Ci	9.59E-02	1.84E-01	3.56E+01		9.35E+00
Xenon-135m	Ci	2.09E-01	5.47E-01	4.78E+00		6.59E+00
Xenon-137	Ci	-----	2.65E+00	6.08E+00		1.46E+01
Xenon-138	Ci	4.11E-01	3.02E+00	8.41E+00		2.60E+01
TOTAL	Ci	7.14E+01	1.17E+02	4.80E+02		2.05E+02
2. <u>Iodines</u>						
Iodine-131	Ci	5.96E-06	7.07E-06	2.43E-04		6.39E-04
Iodine-133	Ci	-----	1.10E-05	3.90E-04		1.89E-03
Iodine-135	Ci	-----	-----	-----		5.00E-04
TOTAL	Ci	5.96E-06	1.81E-05	6.33E-04		3.03E-03
3. <u>Particulates</u>						
Strontium-89	Ci	4.61E-07	1.49E-05	8.85E-05		9.85E-05
Strontium-90	Ci	-----	-----	5.01E-07		1.29E-07
Barium-140	Ci	-----	4.26E-06	1.67E-05		3.70E-05
TOTAL	Ci	4.61E-07	1.92E-05	1.06E-04		1.36E-04
4. <u>Tritium</u>						
Hydrogen-3	Ci	4.90E-01	6.19E-01	1.24E+00		5.81E-01

Note: There were no batch releases for this report period.

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TABLE 1C
GASEOUS EFFLUENTS--GROUND LEVEL RELEASES

NUCLIDES RELEASED	UNIT	QUARTER 1	CONTINUOUS MODE		QUARTER 4
			QUARTER 2	QUARTER 3	
1. <u>Fission Gases</u>					
Krypton-87	Ci	-----	-----	-----	2.56E+00
Xenon-133	Ci	-----	-----	2.43E-01	2.20E+00
Xenon-135	Ci	2.39E-01	1.12E+00	4.78E+00	6.76E-01
Xenon-135m	Ci	-----	8.78E-01	1.11E+01	3.23E+00
Xenon-138	Ci	-----	5.28E+00	3.98E+01	2.01E+01
TOTAL	Ci	2.39E-01	7.28E+00	5.59E+01	2.88E+01
2. <u>Iodines</u>					
Iodine-131	Ci	3.69E-04	2.88E-04	3.01E-03	8.67E-04
Iodine-133	Ci	4.65E-04	9.26E-04	3.73E-03	1.21E-03
Iodine-135	Ci	-----	-----	8.16E-04	-----
TOTAL	Ci	8.34E-04	1.21E-03	7.56E-03	2.08E-03
3. <u>Particulates</u>					
Chromium-51	Ci	-----	-----	-----	1.63E-05
Manganese-54	Ci	5.33E-05	1.82E-05	2.23E-06	2.17E-05
Cobalt-58	Ci	2.08E-05	1.13E-05	1.36E-06	2.02E-07
Iron-59	Ci	-----	-----	-----	7.75E-06
Cobalt-60	Ci	9.46E-06	7.72E-06	2.53E-06	9.47E-06
Zinc-65	Ci	1.04E-04	2.80E-05	3.94E-06	1.11E-05
Strontium-89	Ci	2.35E-06	7.59E-05	1.59E-04	3.47E-04
Strontium-90	Ci	4.67E-07	1.05E-07	4.35E-06	4.49E-08
Antimony-124	Ci	-----	4.68E-07	-----	-----
Cesium-134	Ci	2.51E-05	9.93E-06	-----	-----
Cesium-136	Ci	2.94E-06	-----	-----	-----
Cesium-137	Ci	1.50E-05	3.90E-06	-----	-----
Barium-140	Ci	8.11E-06	4.86E-05	1.03E-04	7.42E-05
TOTAL	Ci	2.42E-04	2.04E-04	2.76E-04	4.88E-04
4. <u>Tritium</u>					
Hydrogen-3	Ci	3.05E+00	3.09E+00	5.03E+00	2.99E+00

Note: There were no batch releases for this report period.

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TABLE 2A
LIQUID EFFLUENTS--SUMMATION OF ALL RELEASES

	<u>UNIT</u>	<u>QTR 1</u>	<u>QTR 2</u>	<u>QTR 3</u>	<u>QTR 4</u>	<u>EST TOTAL ERROR %</u>
A. FISSION AND ACTIVATION PRODUCTS						
1. Total Release (not including tritium, gases and alpha)	Ci	NONE	NONE	NONE	NONE	≤2.50E+01
2. Average diluted concentration during period	μCi/ml	NONE	NONE	NONE	NONE	
3. Applicable ODCM Limit	%	-----	-----	-----	-----	
B. TRITIUM						
1. Total Release	Ci	7.64E-05	9.44E-04	1.85E-03	2.19E-03	≤2.50E+01
2. Average diluted concentration during period	μCi/ml	7.36E-07	1.67E-06	2.34E-06	9.63E-07	
3. Applicable ODCM Limit	%	*	*	*	*	
C. DISSOLVED AND ENTRAINED GASES						
1. Total Release	Ci	NONE	NONE	NONE	NONE	≤2.50E+01
2. Average diluted concentration during period (Note 1)	μCi/ml	NONE	NONE	NONE	NONE	
3. Applicable ODCM Limit	%	-----	-----	-----	-----	
D. GROSS ALPHA RADIOACTIVITY						
1. Total Release	Ci	NONE	NONE	NONE	NONE	≤4.20E+01
E. VOLUME OF WASTE RELEASED (PRIOR TO DILUTION)						
	liters	4.55E+04	1.98E+05	6.79E+05	2.25E+06	
F. VOLUME OF DILUTION WATER USED DURING PERIOD						
	liters	1.04E+08	4.74E+08	3.46E+08	1.68E+08	
*G. PERCENT OF APPLICABLE ODCM LIMITS						
1. Quarterly Whole Body Dose	%	6.80E-06	2.97E-05	3.22E-04	1.56E-04	
2. Quarterly Organ Dose	%	2.04E-06	8.91E-06	9.65E-05	4.67E-05	
3. Annual Whole Body Dose	%	3.40E-06	1.49E-05	1.61E-04	7.78E-05	
4. Annual Organ Dose	%	1.02E-06	4.46E-06	4.83E-05	2.33E-05	

(Note 1) Concentration includes summation from diluted and undiluted values from Canal and Non-Canal releases (Table 2B).

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TABLE 2B
LIQUID EFFLUENTS CANAL

<u>NUCLIDES RELEASED</u>	<u>UNIT</u>	<u>QUARTER 1</u>	<u>BATCH MODE</u>		<u>QUARTER 4</u>
			<u>QUARTER 2</u>	<u>QUARTER 3</u>	
1. <u>Fission and Activation Products</u>					
NONE	Ci	-----	-----	-----	-----
2. <u>Tritium</u>					
HYDROGEN-3	Ci	4.29E-05	6.14E-04	2.56E-04	3.03E-05
3. <u>Dissolved and Entrained Gases</u>					
NONE	Ci	-----	-----	-----	-----

Note: There were no continuous mode discharges during this report period.

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TABLE 2B (SUPPLEMENT)
LIQUID EFFLUENTS NON-CANAL

<u>NUCLIDES RELEASED</u>	<u>UNIT</u>	<u>BATCH MODE</u>			
		<u>QUARTER 1</u>	<u>QUARTER 2</u>	<u>QUARTER 3</u>	<u>QUARTER 4</u>
1. <u>Fission and Activation Products</u>					
NONE	Ci	-----	-----	-----	-----
2. <u>Tritium</u>					
HYDROGEN-3	Ci	3.35E-05	3.30E-04	1.59E-03	2.16E-03
3. <u>Dissolved and Entrained Gases</u>					
NONE	Ci	-----	-----	-----	-----

Note: There were no continuous mode discharges during this report period.

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TABLE 3A
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS

A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (NOT IRRADIATED FUEL)

1. Type of Waste	Unit	Class A	Class B	Class C	Est. Total Error %
a. Spent resins, filter sludges evaporator bottoms, etc.	m ³ Ci	0.00E+00 0.00E+00	0.00E+00 0.00E+00	0.00E+00 0.00E+00	0.00E+00 0.00E+00
b. Dry compressible waste, contaminated equipment, etc.	m ³ Ci	0.00E+00 0.00E+00	0.00E+00 0.00E+00	0.00E+00 0.00E+00	0.00E+00 0.00E+00
c. Irradiated components, control rods, etc.	m ³ Ci	0.00E+00 0.00E+00	0.00E+00 0.00E+00	0.00E+00 0.00E+00	0.00E+00 0.00E+00
d. Other: Dry compressible waste, contaminated equipment, spent resins for volume reduction.	m ³ Ci	8.91E+03 8.81E+01	0.00E+00 0.00E+00	0.00E+00 0.00E+00	1.00E+01 1.00E+01

2. Estimate of Major Nuclide Composition (by type of waste)

a. Spent resins, filter sludges, evaporator bottoms, etc.

NONE

b. Dry compressible waste, contaminated equipment, etc.

NONE

c. Irradiated components, control rods, etc.

NONE

d. Other: Dry compressible waste, contaminated equipment, spent resins for volume reduction.

<u>Isotope</u>	<u>Percent</u>	<u>Curies</u>		<u>Isotope</u>	<u>Percent</u>	<u>Curies</u>	
Iron-55	7.05E+01	6.21E+01	E	Nickel-63	1.61E+00	1.42E-01	E
Cobalt-60	1.86E+01	1.64E+01	E	Tritium	1.38E-01	1.21E-01	E
Manganese-54	3.32E+00	2.92E+00	E	Cerium-144	1.02E-01	9.02E-02	E
Cesium-137	3.29E+00	2.90E+00	E	Nickel-59	7.60E-02	6.70E-02	E
Zinc-65	2.24E+00	1.98E+00	E	Carbon-14	3.42E-02	3.01E-02	E

(E- Estimated M- Measured)

Percentage of nuclides and total activities are based on a combination of direct measurements and scaling for non-gamma emitting nuclides.

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TABLE 3A (continued)
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS

3. Solid Waste Disposition

<u>No. of Shipments</u>	<u>Mode of Transportation</u>	<u>Destination</u>
6	Truck	*RACE LLC Memphis, TN
6	Truck	* Duratek Oak Ridge, TN
3	Truck	* Studsvik Erwin, TN
11	Truck	*Alaron Wampum, PA

*- Volume Reduction Facility

B. IRRADIATED FUEL SHIPMENTS (Disposition)

<u>No. of Shipments</u>	<u>Mode of Transportation</u>	<u>Destination</u>
NONE	-----	-----

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**TABLE 3B
SOLID WASTE AND IRRADIATED FUEL SHIPMENTS**

NRC CLASS A

<u>SOURCE OF WASTE</u>	<u>PROCESSING EMPLOYED</u>	<u>CONTAINER VOLUME</u>	<u>TYPE OF CONTAINER</u>	<u>NUMBER OF CONTAINERS</u>
Spent Resins, Filter Sludges, evaporator Bottoms, etc.	Air Drying Non-compacted	205.8 ft ³	HIC	3
Dry compressible Waste (DAW), Contaminated Equipment, etc.	Non-compacted	1280 ft ³	STC	20
Dry compressible Waste(DAW), Contaminated Equipment, etc.	Non-compacted	96 ft ³	STC	47
Contaminated Oil	Non-compacted	7 ft ³	STC	24
Dry compressible Waste(DAW), Contaminated Equipment	Non-compacted	205.8 ft ³	Steel liner	1

B. NRC CLASS B

<u>SOURCE OF WASTE</u>	<u>PROCESSING EMPLOYED</u>	<u>CONTAINER VOLUME</u>	<u>TYPE OF CONTAINER</u>	<u>NUMBER OF CONTAINERS</u>
NONE	-----	-----	-----	-----

C. NRC CLASS C

<u>SOURCE OF WASTE</u>	<u>PROCESSING EMPLOYED</u>	<u>CONTAINER VOLUME</u>	<u>TYPE OF CONTAINER</u>	<u>NUMBER OF CONTAINERS</u>
NONE	-----	-----	-----	-----

Solidification Agent: NONE

HIC- High Integrity Container
STC- Strong Tight Container

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ATTACHMENT NO. 1

CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

In accordance with the James A. FitzPatrick Nuclear Power Plant Offsite Dose Calculation Manual (ODCM), Part 1 Radiological Effluent Controls (REC) Section 6.2.3, changes made to the Offsite Dose Calculation Manual (ODCM) during the reporting period shall be included in the Annual Radioactive Effluent Release Report.

Revision 18 of the ODCM became effective on September 16, 2004. This revision does not reduce the accuracy or reliability of any dose calculations or setpoint determinations. Listed below is a brief summary of the changes incorporated in this revision. Attached to this report is a revised copy of the ODCM.

1. Part I (REC) Page 02, Section 1.2:

Under Document Revision Overview, changed paragraph to reflect that this revision is revision 09 as DVP-01.02 and revision 18 since the inception of the ODCM as CDP-15.

Reason: To incorporate this revision into the document history. This change increases the accuracy of the ODCM.

2. Part I (REC) Page 20, Section 3.1.1.c.4:

Added the following before the existing paragraph: "Alarm/trip setpoints are determined in accordance with Part 2, Section 4.3.2 to ensure the limits of Section 3.2.1 are not exceeded."

Reason: This information was inadvertently deleted during the ITS rewrite of DVP-01.02 during the transition of RETS to the ODCM when references to the ODCM were deleted. This information is being restored to this section to ensure the correct reference is identified. This change increases the accuracy of the ODCM.

3. Part I (REC) Page 21, Table 3.1-1:

Deleted footnotes (d) and (e) from the table.

Reason: This is an administrative change to eliminate a duplication of a portion of an existing definition that is stated in the Technical Specifications. Note (d) duplicates a portion of the definition of the term 'operable'. Note (e) also duplicates a portion of the definition of the term 'operable'. Change was made to eliminate the potential for confusion regarding what these notes might mean or require. This change does not decrease the accuracy of the ODCM.

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ATTACHMENT NO. 1 (Continued)

CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

4. Part I (REC) Page 43, Section 5.1.2:

Changed "ODCM (Appendix A)" to "ODCM (Appendix H)"

Reason: Incorrect section referenced. Environmental monitoring sampling is located in Appendix H. This change increases the accuracy of the ODCM.

5. Part II, Page 02, Section 1.3:

Under Document Revision Overview, changed paragraph to reflect that this revision is revision 09 as DVP-01.02 and revision 18 since the inception of the ODCM as CDP-15.

Reason: To incorporate this revision into the document history. This change increases the accuracy of the ODCM.

6. Part II, Page 12, Section 3.3.3.1.d.

Corrected a typographical error in the example equation. The ECL value for Co-60 was incorrectly listed as 3E-2. The correct value is 3E-5 for Co-60. This change increases the accuracy of the ODCM.

Reason: Correction of a typographical error. This change increases the accuracy of the ODCM.

7. Part II, Page 27, Section 3.5.2.a

Changed RES Department to Chemistry Department. The RES Department no longer exists and has been replaced by the Chemistry Department.

Reason: This change revises the ODCM to accurately reflect department organizational names.

8. Part II, Page 36, Section 4.3.2.b.1.

Added the statement that K-effective values for the stack were derived from radioactive noble gas effluents for the years 1999 through 2003. (The data set for the vent K-effective did not change and remains 1985 through 1991).

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CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

Reason: New K-effective values for the stack were calculated using the most current data for the stack. The previous values were based on 1985 through 1991 releases. The new K-effective values were calculated based on noble gas-effluents for the years 1999 through 2003. The K-effective values for the vents remained the same as the release from the vents have been minimal over the period of 1999 through 2003. This change increases the accuracy of the ODCM by using the most current data for determining the K-effective values where applicable, thereby still providing conservative values that would be bounding for the case of a fuel failure. Vent and Stack release data from the first two quarters of 2004 was evaluated for K-effective values and was bounded by the K-effective values provided in this revision of the ODCM.

9. Part II, Page 37, Section 4.3.2.b.1

Changed the K-effective values for the stack from $1.51\text{E-}4$ to $2.32\text{E-}4$ and the plus three-sigma value from $4.51\text{E-}5$ to $1.38\text{E-}5$ with a resulting K-effective value of $2.73\text{E-}4$ (previous $2.86\text{E-}4$) as derived from radioactive noble gas effluents for the years 1999 through 2003 for the stack.

Reason: New K-effective values for the stack were calculated using the most current data for the stack. The previous values were based on 1985 through 1991 releases. The new K-effective values were calculated based on noble gas effluents for the years 1999 through 2003. This change increases the accuracy of the ODCM by using the most current data for determining the K-effective values where applicable, and still providing conservative values that would be bounding for the case of a fuel failure.

10. Part II, Page 38, Section 4.3.1.b.1.

Changed the allowable vent release rate limit to $7.515\text{E+}4$ uCi/sec (previous $6.98\text{E-}4$ uCi/sec) as calculated from equation 4-4a.

Reason: New K-effective values for the stack resulted in a lower mrem per uCi per sec value ($\text{mrem-M}^3/\text{uCi-sec}$). By maintaining the stack release rate at $3.00\text{E+}5$ uCi/sec the total allowable vent release rate in uCi/sec can be changed to $7.515\text{E+}4$ uCi/sec. This change does not decrease the reliability of the ODCM.

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ATTACHMENT NO. 1 (Continued)

CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

11. Part II, Page 39, Section 4.3.1.b.1 and 4.3.1.b.2

Changed the allowable vent release rate limit to $7.515\text{E}+4$ uCi/sec (previous $6.98\text{E}-4$ uCi/sec) as calculated from equation 4.4a. See 9 above.

Reason: New K-effective values for the stack resulted in a lower mrem per uCi per sec value ($\text{mrem}\cdot\text{m}^3/\text{uCi}\cdot\text{sec}$). By maintaining the stack release rate at $3.00\text{E}+5$ uCi/sec the total vent release rate in uCi/sec can be increased to $7.515\text{E}+4$ uCi/sec. This change does not decrease the reliability of the ODCM.

12. Part II, Page 44, Section 4.3.2.b

Building vent allowable setpoints release rates and associated radiation monitor K-factors were revised.

Reason: Building vent flow rates used to determine previous setpoint point release rates and original radiation monitor K-factors were determined to be non-conservative relative to measured flow rates. New allowable setpoint release rates and K-factors were determined using the revised building ventilation flow rates. Original flow calculations were based on design bases documentation and plant drawings. Revised allowable setpoint release rates and K-factors are based on engineering analysis of measured flow rates as documented in JAF-ICD-RBC-04561, included as reference 6.20 in ODCM, Part II. (CR-2003-00745)

Added a footnote to the Reactor Building and Refuel Floor nominal setpoint value column that specifies that the maximum value allowed by Technical Specification table 3.3.6.2-1 is $<24,800$ cpm.

Reason: These Technical specification allowable values were not previously listed in the ODCM. They were added to ensure that the 30,000 cpm nominal setpoint value noted in the ODCM table was not misinterpreted as a maximum allowable setpoint value. These values differ because of conservatism that is added to the setpoint value based on the analysis of the total uncertainty in the ventilation radiation monitoring system components ("loop-back" calculation). This change increases the reliability of the ODCM.

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CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

13. Part II, Page 45, Section 4.3.2.b.

Changed the wording, which describes the use of monitor's sensitivity calculation performed by the manufacturer in calculating the monitor k-factors.

Reason: To more clearly describe that the efficiency factor used for calculating the radiation monitor K-factors were derived from the manufacturer's monitor sensitivity equation (CR-2003-00941 CA-1). This change increases the accuracy of the ODCM.

Revised building ventilation flow rates and associated radiation monitor K-factors. Included a reference to the document that documents the new building ventilation flow rates.

Reason: Previous building ventilation flow rates were based on Design Basis Documents and plant drawings and were determined to be non-conservative. Current building ventilation flow rates are based on engineering analysis of measured flow rates as documented in JAF-ICD-RBC-04561. JAF-ICD-RBC-04561 was foot noted in the building flow rate column and was added as reference 6.20 in the reference section of the ODCM. This change increases the accuracy of the ODCM.

14. Changed Part II, Page 83, Section 6.0.

Added Interface Control Document JAF-ICD-RBL-04561 to the reference listing as reference 6.20.

Reason: This is a new reference which documents the flow rates that are to be used in determining the nominal setpoint values for gaseous effluent building ventilation and the associated monitor k-factors. Calculated values can be found in Part II, pages 44 and 45, section 4.3.2.b. (CR-03-00994, CA-01).

15. Part II, Appendix A, Page A-3, Table A-1

Added three additional Environmental Concentration Limits (ECL) to Table A-1:

Nb-95m, ECL= 3.00E-4

Zn-69m, ECL= 6.00E-4

As-76, ECL= 1.00E-4

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CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

Reason: These values are missing from the table, but are addressed in Dose Factor Appendices, and RETDAS/Seeker programs. Values are 10 times the values of 10 CFR 20, Appendix B, Table 2, Column 2.

16. Part II, Appendix A, Page A-6, Table A-2, A_{if} Values – Potable Water – Adult Potable Water – Adult

Changed the BONE Column dose Factors on Table A-2.

Reason: Editorial correction required due to probable transcription error in previous revision of DVP-01.02. The correct values were verified by WPO, Nuclear Engineering Analysis Group.

17. Part II, Page A-13, Table A-3, A_{if} Values – Freshwater Fish – Child

Changed Tc-99m, Lung Dose Factor to $9.04\text{E-}4$.

Reason: Per WPO, Nuclear Engineering Analysis Group, $9.04\text{E-}4$ is recommended. The previous value of $9.07\text{E-}4$ was not correct due to a typographical error in building the table. This change increases the accuracy of the ODCM.

18. Part II, Page E-6 & E-7, Table E-1

Table E-1 was revised to list the calculated K-effective values for the stack that are based on noble gas effluents for the years 1999 through 2003. Table was expanded to 2 pages. The K-effective values for the vents were not changed.

Reason: New K-effective values for the stack were calculated using the most current data for the stack. The previous values were based on 1985 through 1991 releases. The new K-effective values were calculated based on noble gas effluents for the years 1999 through 2003. This change increases the accuracy of the ODCM by using the most current data for determining the K-effective values where applicable and still providing conservative values that would be bounding for the case of a fuel failure.

Added footnote to vent release page of the table explaining why the releases for the years 1985 through 1991 were used for calculating the vent K-effective value.

Reason: Footnote was added to explain why different data sets (year ranges) were used for the vents and stack for determining K-effective values. This change increases the accuracy of the ODCM.

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ATTACHMENT NO. 1 (Continued)

CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

19. Part II, Appendix F, Page F-10, Figure F-5

Revised Figure F-5, Liquid Effluent Release Pathways to include the East and West Storm Drains and the associated inputs.

Reason: This change increases the accuracy of the ODCM by identifying potential and existing liquid effluent pathways. Tritium has been identified as an effluent in the West Storm Drain (CR-2002-03695, CA-0013).

20. Part II, Appendix F, Page F-11, Figure F-6

Revised Figure F-6 Solid Radwaste Treatment System to include Fuel Pool Filtration as part of the Radwaste System.

Reason: This change increases the accuracy of the ODCM by identifying a component in the Solid Radwaste System that was not previously identified.

21. Part II, Appendix H, Table H-1, Pages H-5 through H-9.

Location, Distance and Direction columns were revised using Global Positioning System (GPS) inputs.

Reason: This change was implemented because GPS measurements provided more accurate distance and direction measurement than map readings. This change improves the accuracy of the ODCM.

22. Part II, Appendix H, Table H-1, Page H-9.

Changes were made to the listed Food Product Garden Locations. Locations 55, 57, 144, 343, 422, 425, and 426 were added. Locations 59, 165, 175, 190 and C-1 were deleted as possible food product locations.

Reason: This change was made to include possible new food product locations based on the land use census garden surveys. Five locations were deleted as noted inactive locations based on the previous five years of Land Use Census Garden Surveys. This change increases the accuracy of the ODCM.

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ATTACHMENT NO. 1 (Continued)

CHANGES TO THE OFFSITE DOSE CALCULATION MANUAL (ODCM)

23. Part II, Appendix H, Page H-11, Figure H-1

Map of Sample Locations, was revised to reflect changes in food product sampling locations (see 15 above).

Reason: This change improves the accuracy of the ODCM by updating the sample location map with new sample locations identified in the Land Use Census and deleting inactive sample locations. This change increases the accuracy of the ODCM.

24. Part II, Appendix I, Page I-6, Table I-2

Updated the row 1, "Corresponding Limits Values" column with the vent release rate of $7.515\text{E}+4$ uCi/sec which is used in Part II, section 4.3.2.b for determining the release rate setpoints.

Reason: This change updates table I-2 to be consistent with Vent release rate used in Part II, section 4.3.2.b for determining the vent release rate setpoints and maintains the accuracy of the ODCM.

25. Part II, Appendix H, Table H-1, Page H-9

Changes were made to the listed Food Product Garden Locations. Locations 55, 57, 144, 343, 422, 425, and 426 were added. Locations 59, 165, 175, 190 and C-1 were deleted as possible food product locations.

Reason: This change was made to include possible new food product locations based on the land use census garden surveys. Five locations were deleted as inactive locations based on the previous five years of Land Use Census Garden Surveys. This change increases the accuracy of the ODCM.

26. Part II, Appendix H, Page H-11, Figure H-1

Map of Sample Locations, was revised to reflect changes in food product sampling locations (see 25 above).

Reason: This change increases the accuracy of the ODCM by updating the sample location map with new sample locations identified in the Land Use Census and deleting inactive sample locations.

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ATTACHMENT NO. 2

SUMMARY OF CHANGES TO THE PROCESS CONTROL PROGRAM

In accordance with the James A. FitzPatrick Nuclear Power Plant Offsite Dose Calculation Manual (ODCM), Part 1 Radiological Effluent Controls (REC) Section 6.2.3, changes made to the Process Control Program (PCP) during the reporting period shall be included in the Annual Radioactive Effluent Release Report.

There were no changes to the Process Control Program Procedure or implementing procedures.

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ATTACHMENT NO. 3

SUMMARY OF CHANGES TO THE ENVIRONMENTAL MONITORING AND
DOSE CALCULATION LOCATIONS

In accordance with the James A. FitzPatrick Nuclear Power Plant ODCM, Part 1, Section 6.2.3, a listing of new locations for dose calculation and/or environmental monitoring identified by the land use census shall be included in the Annual Radioactive Effluent Release Report.

CHANGES IN ENVIRONMENTAL MONITORING LOCATIONS

During the report period, no changes were made to the Environmental Monitoring Locations sampled to implement the requirements of the ODCM, Part 1, table 5.1-1. Sample location selections were based on the 2004 annual land use census. Based on the garden census, food product locations 55, 57, 144, 343, 422, 425, and 426 were added to the ODCM as potential sampling locations. These locations were not utilized to implement the 2004 food product sampling requirements as previously existing garden locations with higher D/Q values were sampled in 2004.

NEW LOCATIONS FOR DOSE CALCULATIONS

During the report period, no changes in Dose Calculation Receptor Locations were required based on the results of the land use census.

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ATTACHMENT NO. 4

**DEVIATIONS FROM THE REQUIRED
ENVIRONMENTAL SAMPLING SCHEDULE**

In accordance with the James A. FitzPatrick Nuclear Power Plant Off Site Dose Calculation Manual (ODCM), Part 1, Section 6.2.7 the cause for the unavailability of any environmental samples required during the report period shall be included in the Annual Radioactive Effluent Release Report.

The following reports samples that were a deviation from the requirements of ODCM Part 1, Table 5.1-1. ODCM Part I, Section 5.1.1.c.1 allows for deviations from the program due to hazardous conditions, seasonal unavailability, theft, uncooperative residents, or to malfunction of automatic sampling equipment.

EXCEPTIONS TO THE 2004 ENVIRONMENTAL SAMPLING PROGRAM

The following are deviations from the program specified by the ODCM:

Air Sampling Stations

1. The air sampling pumps at the site environmental stations R-1, R-3, and R-4 were inoperable for varying lengths of time during the sample period of 5/18/04 through 5/25/04. The inoperability was caused by power outages as a result of a series of thunderstorms during the sample period. The following lengths of inoperability were observed: R-1 (22.4 hrs.), R-3 (6.1 hrs.), and R-4 (6.1 hrs.). Operability was restored as power was restored to the electrical grid. No corrective action was implemented.
2. The air sampling pump at the R-5 Offsite Environmental sampling station was inoperable for approximately 1.8 hours during the sample period of August 10 through 17, 2004. The air sample pump was running at the time of sample collection. The sample pump out of service time was determined based on the sample pump run time integrator. The inoperability of the pump was likely due to a short power outage. Severe thunderstorms were experienced in the area of the monitoring station during the sample period. No corrective action was implemented.
3. The air sampling pumps at the R-3 and R-4 offsite environmental stations were temporarily inoperable during the sample period of 09/28/04 through 10/06/04. The inoperability was caused by a power outage on the local electrical distribution system. The following lengths of inoperability were observed: R-3 (1.5 hrs.) and R-4 (1.5 hrs.). Operability was restored as power was restored to the electrical grid. The power outage was documented in a Niagara Mohawk news release. No corrective action was implemented.

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ATTACHMENT NO. 4 (Continued)

4. The air sampling pump run time integrator at the R-5 Offsite Environmental sampling station indicated three hours of sample pump inoperability over the seven day sample period from 10/12/04 through 10/19/04. The measured integrated sample volume was within the procedural acceptance criteria. The sample pump was running at the time of sample collection and there was no indication of equipment damage. Loss of sample time may have been the result of a local, short-term power outage. No corrective action was implemented.

The unavailability of these samples was the result of equipment failure. No replacement samples or changes in sample locations were required. The ODCM was not revised as a result of the sample unavailability.

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ATTACHMENT NO. 5

ANNUAL SUMMARY OF HOURLY METEOROLOGICAL DATA

The James A. FitzPatrick Nuclear Power Plant Offsite Dose Calculation Manual (ODCM), Part 1, Radiological Controls (REC) Section 6.2 and 6.2.2 states in part: The Annual Radioactive Effluent Release Report submitted prior to May 1 of each year may include an annual summary of meteorological data collected over the previous year. If the meteorological data is not included, the licensee shall retain it on file and provide it to the U.S. Nuclear Regulatory Commission upon request. In accordance with the aforementioned ODCM requirement, meteorological data is not included in this report. It is retained on file and is available upon request.

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ATTACHMENT NO. 6

**MAJOR MODIFICATIONS TO RADIOACTIVE LIQUID, GASEOUS AND SOLID
WASTE TREATMENT SYSTEMS**

In accordance with the James A. FitzPatrick Nuclear Power Plant Offsite Dose Calculation Manual (ODCM), Part 1 Radiological Controls (REC) Section 7.0, Major Modifications to Radioactive Waste Treatment Systems (liquid, gaseous and solid) shall be reported in the Annual Radioactive Effluent Release Report for the period in which the modification is completed and made operational.

There were no major modifications to any liquid, gaseous, or solid radioactive waste treatment systems.

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ADDENDUM 1

ASSESSMENT OF RADIATION DOSES TO THE PUBLIC JANUARY - DECEMBER 2004

1. INTRODUCTION

The James A. FitzPatrick Nuclear Power Plant Offsite Dose Calculation Manual (ODCM), Part 1 Radiological Controls, requires an assessment of the radiation doses to the public due to radioactive liquid and gaseous effluents. This assessment of doses to the public is based on accepted methodologies found in the Offsite Dose Calculation Manual (ODCM).

2. DOSE LIMITS

A. DOSE FROM LIQUID EFFLUENTS (ODCM, Part 1, REC 2.3)

Applicability

Applies to doses from radioactive material in liquid effluents.

Objective

To ensure that the dose limitations of 10 CFR 50, Appendix I, are met.

Specifications

The dose to a member of the public from radioactive materials released from the plant in liquid effluents to unrestricted areas shall be limited as follows:

1. During any calendar quarter, limited to less than or equal to 1.5 mrem to the whole body and to less than or equal to 5 mrem to any organ.
2. During any calendar year, limited to less than or equal to 3 mrem to the whole body and to less than or equal to 10 mrem to any organ.

B. GASEOUS DOSE RATES (ODCM, Part 1, REC 3.2)

Applicability

Applies to the radiation dose from radioactive material in gaseous effluents.

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ADDENDUM 1 (continued)

Objective

To ensure that the dose rates at or beyond the site boundary from gaseous effluents do not exceed the annual dose limits of 10 CFR 20, for unrestricted areas.

Specifications

The dose rate at or beyond the site boundary due to radioactive materials released from the plant in gaseous effluents shall be limited as follows:

1. Less than or equal to 500 mrem/year to the whole body and less than or equal to 3000 mrem/year to the skin from noble gases; and,
2. Less than or equal to 1500 mrem/year to any organ from Iodine-131, Iodine-133, Tritium and for radioactive materials in particulate form with half-lives greater than 8 days (inhalation pathway only).

C. AIR DOSE, NOBLE GASES (ODCM, Part 1, REC 3.3)

Applicability

Applies to the air dose due to noble gases in gaseous effluents.

Objective

To ensure that the noble gas dose limitations of 10 CFR 50, Appendix I, are met.

Specifications

The air dose to areas at or beyond the site boundary from noble gases released from the plant in gaseous effluents shall be limited:

1. During any calendar quarter, to less than or equal to 5 mrad from gamma radiation, and less than or equal to 10 mrad from beta radiation; and,
2. During any calendar year, to less than or equal to 10 mrad from gamma radiation and less than or equal to 20 mrad from beta radiation.

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ADDENDUM 1 (continued)

D. DOSE DUE TO IODINE-131, IODINE-133, TRITIUM AND RADIONUCLIDES IN PARTICULATE FORM (ODCM, Part 1, REC 3.4)

Applicability

Applies to the cumulative dose from Iodine-131, Iodine-133, Tritium, and radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents.

Objective

To ensure that the dose limitations of 10 CFR 50, Appendix I, are met.

Specifications

The dose to a member of the public at or beyond the site boundary from Iodine-131, Iodine-133, Tritium, and radionuclides in particulate form with half-lives greater than 8 days released from the plant in gaseous effluents shall be limited:

1. During any calendar quarter to less than or equal to 7.5 mrem to any organ; and,
2. During any calendar year to less than or equal to 15 mrem to any organ.

E. TOTAL DOSE FROM URANIUM FUEL CYCLE (ODCM, Part 1, REC 4.0)

Applicability

Applies to radiation dose from releases of radioactivity and radiation from uranium fuel cycle sources.

Objective

To ensure that the requirements of 40 CFR 190 are met.

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ADDENDUM 1 (continued)

Specifications

The dose or dose commitment to any member of the public, due to releases of radioactivity and radiation, from uranium fuel cycle sources shall be limited as follows:

1. Less than or equal to 25 mrem/year to the whole body; and,
2. Less than or equal to 25 mrem/year to any organ except the thyroid which shall be limited to less than or equal to 75 mrem/year.

3. DOSE ASSESSMENT

A. METHODOLOGY

The assessment of radiation doses to the public due to radioactive liquid and gaseous effluents is performed in accordance with the ODCM. The ODCM is based on methodologies and models suggested by the "Guidance Manual For Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants" (NUREG-0133) and "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the purpose of Evaluating Compliance with 10CFR50, Appendix I" (Regulatory Guide 1.109).

B. ASSUMPTIONS

Dose calculations are performed using formulas and constants defined in the ODCM. Specific radioactive release activities used in the dose calculations are listed in the Annual Radioactive Effluent Release Report (1.21 Report) for the period of January 1, 2004 to December 31, 2004. Historical meteorological data was used to generate tables of average dispersion factors. Locations of interest were identified from the 2004 land use census. Dispersion factors and locations of interest used in performing the dose calculations are listed in Table 2.

C. ASSESSMENT RESULTS SUMMARY

The calculated doses to the public due to radioactive effluents are listed in Table 1. The calculated doses are small fractions of their respective dose limits.

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ADDENDUM 1 (continued)

4. 40 CFR 190 DOSE ASSESSMENT

A. METHODOLOGY

Evaluation to demonstrate compliance with the 40 CFR 190 dose limits must be performed when the doses calculated for 10 CFR 50 compliance exceed twice their respective limits. When additional dose assessment is required to demonstrate compliance with 40 CFR 190 it is performed in accordance with the ODCM.

B. RESULTS SUMMARY

The cumulative dose contribution from liquid and gaseous effluents for this report period were calculated and are listed in Table 1. The cumulative dose contribution from direct radiation from the reactor unit and from radwaste storage tanks is measured by environmental thermoluminescent dosimeters for the report period. This data is contained in the Annual Environmental Operating Report. The calculated doses from liquid and gaseous effluents are less than twice their respective 10 CFR 50 limits, therefore, additional calculations are not necessary to demonstrate compliance with 40 CFR 190 dose limits (ODCM, Part 1, REC 4.1.1.c)

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ADDENDUM 1 (continued)

**TABLE 1
ANNUAL DOSE ASSESSMENT 2004**

A. LIQUIDS					
<u>QUARTER</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>ANNUAL</u>
	(a)	(a)	(a)	(a)	(a)
Organ (mrem)	1.02E-07	4.46E-07	4.83E-06	2.33E-06	7.71E-06
% of Limit	2.04E-06	8.92E-06	9.66E-05	4.66E-05	7.71E-05
	(b)	(b)	(b)	(b)	(b)
Whole Body (mrem)	1.02E-07	4.46E-07	4.83E-06	2.33E-06	7.71E-06
% of Limit	6.80E-06	2.97E-05	3.22E-04	1.55E-04	2.57E-04

(a) Dose to the Child Liver primarily by the potable water pathway.

(b) Dose to the Child Whole Body primarily by the potable water pathway.

B. NOBLE GASES					
<u>QUARTER</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>ANNUAL</u>
Total Body (mrem/yr)	1.22E-02	2.29E-02	1.34E-01	3.93E-01	3.93E-01
% of Limit	2.43E-03	4.59E-03	2.68E-02	7.87E-02	7.87E-02
Skin (mrem/yr)	1.49E-02	3.25E-02	1.66E-01	5.33E-01	5.33E-01
% of Limit	4.94E-04	1.08E-03	5.54E-03	1.78E-02	1.78E-02
Gamma (mrad)	6.41E-04	1.67E-03	8.34E-03	5.54E-03	1.62E-02
% of Limit	1.28E-02	3.33E-02	1.67E-01	1.11E-01	1.62E-01
Beta (mrad)	1.09E-04	5.18E-04	3.11E-03	2.06E-03	5.80E-03
% of Limit	1.09E-03	5.18E-03	3.11E-02	2.06E-02	2.90E-02

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ADDENDUM 1 (continued)

**TABLE 1
ANNUAL DOSE ASSESSMENT 2004**

C. IODINES AND PARTICULATES					
<u>QUARTER</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>ANNUAL</u>
	(a)	(a)	(a)	(a)	(a)
Organ (mrem)	5.36E-03	4.26E-03	4.39E-02	1.98E-02	7.33E-02
% of Limit	7.15E-02	5.68E-02	5.85E-01	2.64E-01	4.89E-01
	(b)	(b)	(b)	(b)	(b)
Organ Dose Rate (mrem/yr)	1.46E-03	4.72E-04	1.26E-02	1.26E-02	1.26E-02
% of Limit	9.73E-05	3.15E-05	8.40E-04	8.40E-04	8.40E-04

(a) Dose to the Infant Thyroid primarily by the cows milk pathway.

(b) Dose to the Child Thyroid primarily by the vegetation pathway.

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ADDENDUM 1 (continued)

TABLE 2
METEOROLOGICAL DATA AND LOCATIONS OF INTEREST

RECEPTOR	GEOGRAPHIC LOCATION		ATMOSPHERIC** DISPERSION FACTOR	
A. IODINE & PARTICULATES	DISTANCE/ DIRECTION	RELEASE POINT	X/Q (sec/m ³)	D/Q (l/m ²)
1. Garden	0.90 mi @ 83°E	ST	2.83E-08*	1.75E-09
Grazing Season	0.90 mi @ 83°E	RX	2.02E-07*	5.01E-09
Cary	0.90 mi @ 83°E	TB	1.83E-07*	4.80E-09
Location No. 78	0.90 mi @ 83°E	RF	2.02E-07*	5.01E-09
	0.90 mi @ 83°E	RW	3.21E-07*	5.76E-09
2. Meat	1.18 mi @ 127°SE	ST	1.72E-08*	6.80E-10
Grazing Season	1.18 mi @ 127°SE	RX	5.36E-08*	1.30E-09
Parkhurst	1.18 mi @ 127°SE	TB	5.14E-08*	1.27E-09
Location No. 26	1.18 mi @ 127°SE	RF	5.36E-08*	1.30E-09
	1.18 mi @ 127°SE	RW	9.12E-08*	1.46E-09
3. Cow	2.50 mi @ 139°SE	ST	1.67E-08*	2.65E-10
Grazing Season	2.50 mi @ 139°SE	RX	2.76E-08*	4.14E-10
France	2.50 mi @ 139°SE	TB	2.71E-08*	4.07E-10
Location No. 10	2.50 mi @ 139°SE	RF	2.76E-08*	4.14E-10
	2.50 mi @ 139°SE	RW	4.15E-08*	4.36E-10
4. Goat (D/Q)	3.62 mi @ 113°ESE	ST	-----	2.28E-10
Grazing Season	3.62 mi @ 113°ESE	RX	-----	3.40E-10
Showers	3.62 mi @ 113°ESE	TB	-----	3.33E-10
Location No. 71	3.62 mi @ 113°ESE	RF	-----	3.40E-10
	3.62 mi @ 113°ESE	RW	-----	3.49E-10
5. Goat (X/Q)	2.64 mi @ 152°SSE	ST	1.94E-08*	-----
Grazing Season	2.64 mi @ 152°SSE	RX	2.58E-08*	-----
Nickolas	2.64 mi @ 152°SSE	TB	2.57E-08*	-----
Location No. 61	2.64 mi @ 152°SSE	RF	2.58E-08*	-----
	2.64 mi @ 152°SSE	RW	3.59E-08*	-----

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TABLE 2
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RECEPTOR	GEOGRAPHIC LOCATION	ATMOSPHERIC** DISPERSION FACTOR		
A. IODINE & PARTICULATES	DISTANCE/ DIRECTION	RELEASE POINT	X/Q (sec/m3)	D/Q (l/m2)
6. Resident Annual Average				
a. Inhalation ⁽²⁾	1.55 mi @ 90°E ⁽¹⁾	ST	2.99E-08	-----
Cary	0.90 mi @ 83°E	RX	2.07E-07	-----
Location No. 78	0.90 mi @ 83°E	TB	1.88E-07	-----
	0.90 mi @ 83°E	RF	2.07E-07	-----
	0.90 mi @ 83°E	RW	3.06E-07	-----
b. Deposition ⁽³⁾	0.71 mi @ 118°ESE	ST	-----	1.60E-09
Whaley	0.71 mi @ 118°ESE	RX	-----	5.52E-09
Location No. 199	0.71 mi @ 118°ESE	TB	-----	5.30E-09
	0.71 mi @ 118°ESE	RF	-----	5.52E-09
	0.71 mi @ 118°ESE	RW	-----	6.28E-09
B. NOBLE GASES				
1. Air Dose	1.55 mi @ 90°E ⁽¹⁾	ST	2.99E-08	-----
Annual Average	0.60 mi @ 90°E	ST(fc)	1.16E-07	-----
Site Boundary	0.60 mi @ 90°E	RX	3.58E-07	-----
	0.60 mi @ 90°E	TB	3.19E-07	-----
	0.60 mi @ 90°E	RF	3.58E-07	-----
	0.60 mi @ 90°E	RW	5.39E-07	-----
2. Total Body	0.60 mi @ 90°E	ST(fc)	1.16E-07	-----
Annual Average	0.60 mi @ 90°E	RX	3.58E-07	-----
Site Boundary	0.60 mi @ 90°E	TB	3.19E-07	-----
	0.60 mi @ 90°E	RF	3.58E-07	-----
	0.60 mi @ 90°E	RW	5.39E-07	-----

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TABLE 2
METEOROLOGICAL DATA AND LOCATIONS OF INTEREST

RECEPTOR	GEOGRAPHIC LOCATION	ATMOSPHERIC** DISPERSION FACTOR		
B. NOBLE GASES (continued)	DISTANCE/ DIRECTION	RELEASE POINT	X/Q (sec/m3)	D/Q (l/m2)
3. Skin	1.55 mi @ 90°E	ST	2.99E-08	-----
Annual Average	0.60 mi @ 90°E	ST(fc)	1.16E-07	-----
Site Boundary	0.60 mi @ 90°E	RX	3.58E-07	-----
	0.60 mi @ 90°E	TB	3.19E-07	-----
	0.60 mi @ 90°E	RF	3.58E-07	-----
	0.60 mi @ 90°E	RW	5.39E-07	-----

* Tritium Dose Calculation

** Based on ODCM X/Q, D/Q Values Rev. 08

- (1) Highest Sector Average X/Q in a populated area, not an identified residence.
- (2) Inhalation uses Annual Average X/Q values. All other receptors use grazing season meteorology.
- (3) Deposition uses Annual Average D/Q values. All other receptors use grazing season meteorology.

ST = Main Stack

RX = Reactor Building Vent

TB = Turbine Building Vent

RF = Refuel Floor Vent

RW = Radwaste Building Vent

fc = Finite Cloud