

**Industry Ground Water Protection
Voluntary Communication Protocol
Interim Guidance Document – June 2006**

Voluntary Communication (Section 2 of Industry Initiative)

The Industry Groundwater Protection Initiative requires that by July 31, 2006, each member company operating or decommissioning a nuclear power plant:

“Expand the scope of the licensee’s existing Radiological Environmental Monitoring Program (REMP) or Radiological Effluent Technical Specification Program (RETS) reporting requirements to include additional voluntary formal and informal reporting.”

Objective/Acceptance Criteria:

The following objective/acceptance criteria only apply to licensed radioactive materials that are generated as a result of plant operations.

- 2.1 “Document all onsite groundwater sample results and a description of any significant onsite leaks/spills into groundwater for each calendar year in the Annual Radiological Environmental Operating Report (AREOR) for REMP or the Annual Radioactive Effluent Release Report (ARERR) for the RETS as contained in the appropriate Site level reporting procedure, beginning with the report covering the calendar year 2006.”

Acceptance Criteria:

- a. It is expected that appropriate site procedures contain the communication expectations by July 31, 2006.
- b. The appropriate changes to the ODCM are expected to be completed in a timeframe to support the 2007 report of 2006 performance.
- c. The following are to be included in one or both of the above referenced annual reports*:
 - i. All onsite and offsite groundwater sample results taken in support of the Industry Initiative unless it will be documented in accordance with the ODCM and provided in the ARERR.
 - ii. A description of all spills or leaks that are communicated per 2.2 and 2.3 of this Initiative.

* The distribution of information between the RETS and REMP reports will be based on a position paper developed during the industry RETS/REMP workshop and will be incorporated in to this guidance at a later date.

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- 2.2 “Submit a written 30-day report to the NRC for any water sample result for onsite groundwater that is or may be used as a source of drinking water that exceeds the criteria in the licensee’s existing REMP/ODCM for 30-day reporting of offsite water sample results. Copies of the written 30-day reports for both onsite and offsite water samples will also be provided to the appropriate State/Local officials.”

Acceptance Criteria:

- a. All groundwater samples taken for the Industry Initiative will be analyzed and compared to the standards and limits contained in the station’s REMP/ODCM. A written 30-day NRC report is required for all sample results (either onsite or offsite) that exceed the REMP/ODCM reporting criterion and could potentially reach the groundwater that is or could be in the future used as a source of drinking water. If the groundwater is not currently used for drinking water but is potable, each station should consider the groundwater as a potential source of drinking water.

The initial discovery of groundwater contamination greater than the REMP/ODCM criterion is the event documented in a written 30-day report. It is not expected that a written 30-day report will be generated each time a subsequent sample(s) from the same “plume” identifies concentrations greater than the REMP/ODCM criterion.

For conditions that existed prior to July 31, 2006, it is not necessary to generate a 30 day report if the condition has been reported previously and communicated to State/Local officials.

- b. All written 30-day NRC reports generated under item 2.2.i are to be concurrently forwarded to the designated State/Local officials.

- 2.3 “Make informal¹ communication as soon as practicable to appropriate State/Local officials, with follow-up notification to the NRC, as appropriate, regarding significant² onsite leaks/spills into groundwater (see Item 2.2) and onsite or offsite water sample results exceeding the criteria in the REMP/ODCM.”

¹ “Informal” is intended to mean a communication between the station and the State/Local officials. It is not intended to mean a “notification” that would require a 4-hour 10 CFR 50.72 notification to the NRC. The NRC has been asked to clarify this issue and will contact NEI prior to July 31st. However, this guidance does not take the place of any existing State requirements or regulations. If a station makes a “formal” communication to a State because of a regulatory requirement, then a 4-hour 10 CFR 50.72 NRC notification needs to be considered.

² “Significant” as used in the Industry Initiative is intended to be defined in part as what is of interest to the public. It is not intended to imply or refer back to regulatory terminology nor is it intended to indicate that the leak or spill has public health and safety or environmental protection consequences.

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Acceptance Criteria:

This guidance provides a maximum threshold for reporting. Some States may require lower reporting thresholds. Also, as described in 2.2 a. above, the criteria below applies to groundwater that is used for drinking water or could be used for drinking water.

- a. Communication to the designated State/Local officials will be made before the end of the next business day if an inadvertent unmonitored leak or spill to the environment has or can potentially get into the groundwater and exceeds any of the following criterion:
 - i. If a spill or leak from a radiologically contaminated source exceeds 100 gallons; or
 - ii. If a spill or leak volume cannot be quantified.
- b. All leaks, regardless of volume or activity from a higher risk system or component (e.g. spent full pool or outdoor refueling water storage tank) and can potentially get into groundwater will be communicated to the appropriate State/Local officials before the end of the next business day.
- c. Communication with the designated State/Local officials will be made before the end of the next business day for water sample results if:
 - i. A water sample from offsite groundwater or surface water exceeds the reporting criterion for water provided in the REMP/ODCM.
 - ii. A water sample from an onsite groundwater monitoring well or surface water that is hydrologically connected to groundwater exceeds the reporting criterion for water in the REMP/ODCM.
- d. When communicating to the State/Local officials, be clear and precise on quantifying the actual release information as it applies to the appropriate regulatory criteria (i.e. put it in perspective).
- e. Each station should consider reviewing their site specific action plan with the designated State/Local officials and clearly articulate:
 - i. “Why” the action plans were put in place, i.e. industry events.
 - ii. Past events that would have triggered this communication.
 - iii. Ask if there is additional information that the State/Local officials need to better understand the issue.
 - iv. Gain an understanding of “what” the State/Local officials will do with the information.
- f. For stations that are located in States that have multiple nuclear power plant locations and multiple owner companies, it is highly recommended that the utilities communicate with each other and gain agreement on a common message to be delivered to the State officials.