





## Environmental Protection Agency

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

November 20, 2010

FirstEnergy Nuclear Gen Corp - Davis-Besse \*  
5501 N State Rte 2  
Oak Harbor, OH 43449

Dear Permittee:

A Preliminary Compliance Review was conducted on your Discharge Monitoring Report (DMR) submitted on November 19, 2010. As detailed at the end of this letter, screening of your submitted DMR has identified possible compliance issues. Please review the information and take the appropriate action:

- If you believe the identified compliance issues are in error based on your understanding of your NPDES permit conditions, contact your Ohio EPA District Representative, Rick Zuzik, at 1-800-686-6930 or [Rick.Zuzik@epa.state.oh.us](mailto:Rick.Zuzik@epa.state.oh.us)
- Part III-12 of your NPDES permit requires that you submit an email or a letter of explanation outlining the actions you have taken or are taking to correct certain instances of non-compliance. If you have not already done so, please submit the email or letter to your Ohio EPA District representative at the following address:

Rick Zuzik  
Ohio EPA - Northwest District Office  
347 N. Dunbridge Road  
Bowling Green, Ohio  
1-800-686-6930 or [Rick.Zuzik@epa.state.oh.us](mailto:Rick.Zuzik@epa.state.oh.us)

- The following web address contains useful eDMR submission information including definitions of limit violations, non-numeric violations, frequency violations, calculation of average concentrations, and correct A-code use:  
<http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx>

Sincerely,

Ed Swindall  
[ed.swindall@epa.state.oh.us](mailto:ed.swindall@epa.state.oh.us)  
Supervisor, Permits Compliance Unit  
Ohio EPA, Division of Surface Water

50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

614 | 644 3020  
614 | 644 3184 (fax)  
[www.epa.ohio.gov](http://www.epa.ohio.gov)



# Environmental Protection Agency

Ted Strickland, **Governor**  
Lee Fisher, **Lt. Governor**  
Chris Korleski, **Director**

## Preliminary Compliance Report

**Facility:** FirstEnergy Nuclear Gen Corp - Davis-Besse \*

**Permit No.:** 2IB00011\*ID

**Report Period:** October 2010

**Date Received:** 11/19/2010

Station	Type	Date	Reporting Code	Parameter	Limit Type	Permit Limit	Reported Value
001	Freq	10/15/2010	00300	Dissolved Oxygen	1/2Weeks	1	0







## Environmental Protection Agency

Ted Strickland, **Governor**  
Lee Fisher, **Lt. Governor**  
Chris Korfeski, **Director**

September 21, 2010

FirstEnergy Nuclear Gen Corp - Davis-Besse \*  
5501 N State Rte 2  
Oak Harbor, OH 43449

Dear Permittee:

A Preliminary Compliance Review was conducted on your Discharge Monitoring Report (DMR) submitted on September 20, 2010. As detailed at the end of this letter, screening of your submitted DMR has identified possible compliance issues. Please review the information and take the appropriate action:

- If you believe the identified compliance issues are in error based on your understanding of your NPDES permit conditions, contact your Ohio EPA District Representative, Rick Zuzik, at 1-800-686-6930 or [Rick.Zuzik@epa.state.oh.us](mailto:Rick.Zuzik@epa.state.oh.us)
- Part III-12 of your NPDES permit requires that you submit an email or a letter of explanation outlining the actions you have taken or are taking to correct certain instances of non-compliance. If you have not already done so, please submit the email or letter to your Ohio EPA District representative at the following address:

Rick Zuzik  
Ohio EPA - Northwest District Office  
347 N. Dunbridge Road  
Bowling Green, Ohio  
1-800-686-6930 or [Rick.Zuzik@epa.state.oh.us](mailto:Rick.Zuzik@epa.state.oh.us)

- The following web address contains useful eDMR submission information including definitions of limit violations, non-numeric violations, frequency violations, calculation of average concentrations, and correct A-code use:  
<http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx>

Sincerely,

Ed Swindall  
[ed.swindall@epa.state.oh.us](mailto:ed.swindall@epa.state.oh.us)  
Supervisor, Permits Compliance Unit  
Ohio EPA, Division of Surface Water



# Environmental Protection Agency

Ted Strickland, **Governor**  
Lee Fisher, **Lt. Governor**  
Chris Korleski, **Director**

## Preliminary Compliance Report

**Facility:** FirstEnergy Nuclear Gen Corp - Davis-Besse \*

**Permit No.:** 2IB00011\*ID

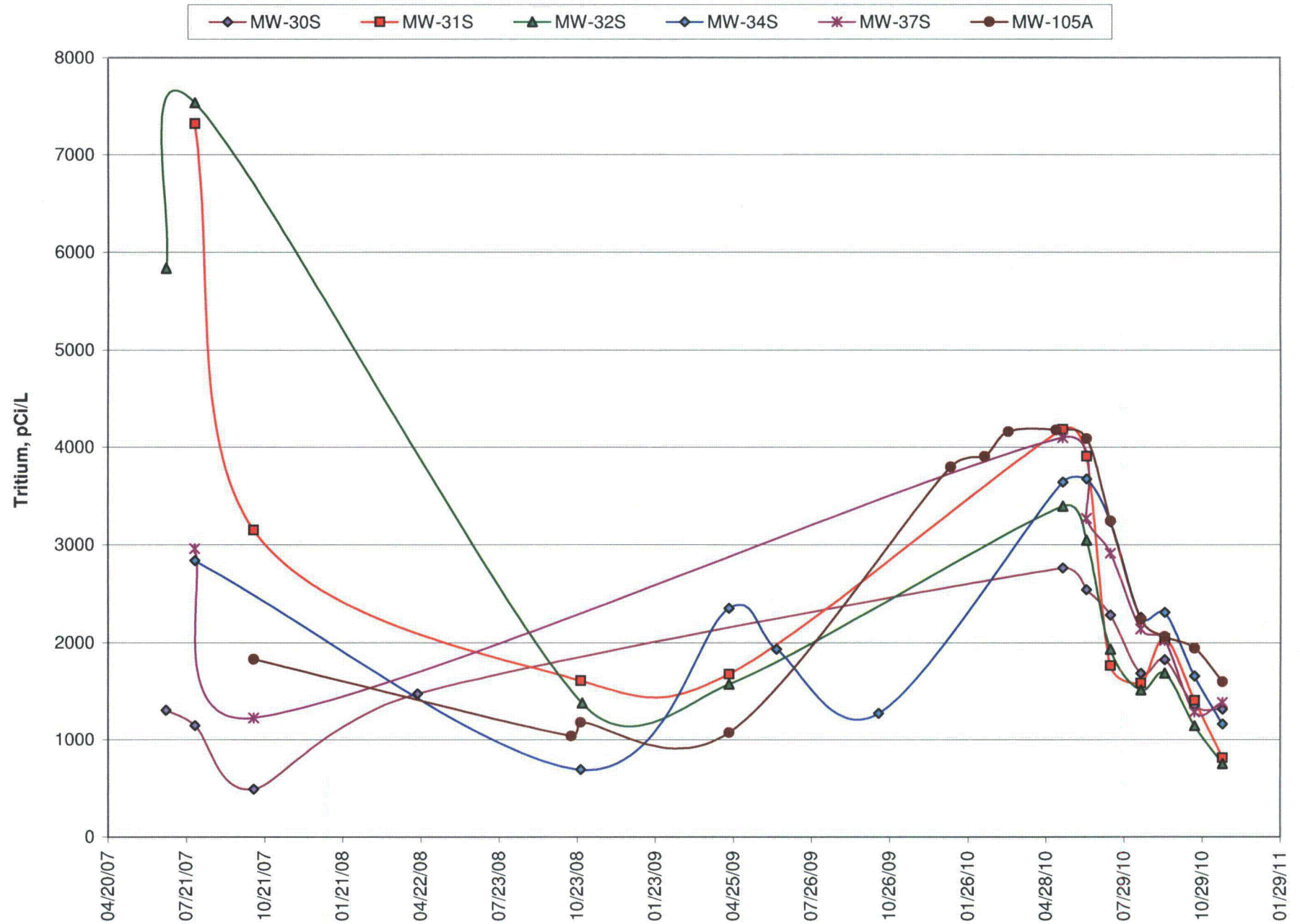
**Report Period:** August 2010

**Date Received:** 9/20/2010

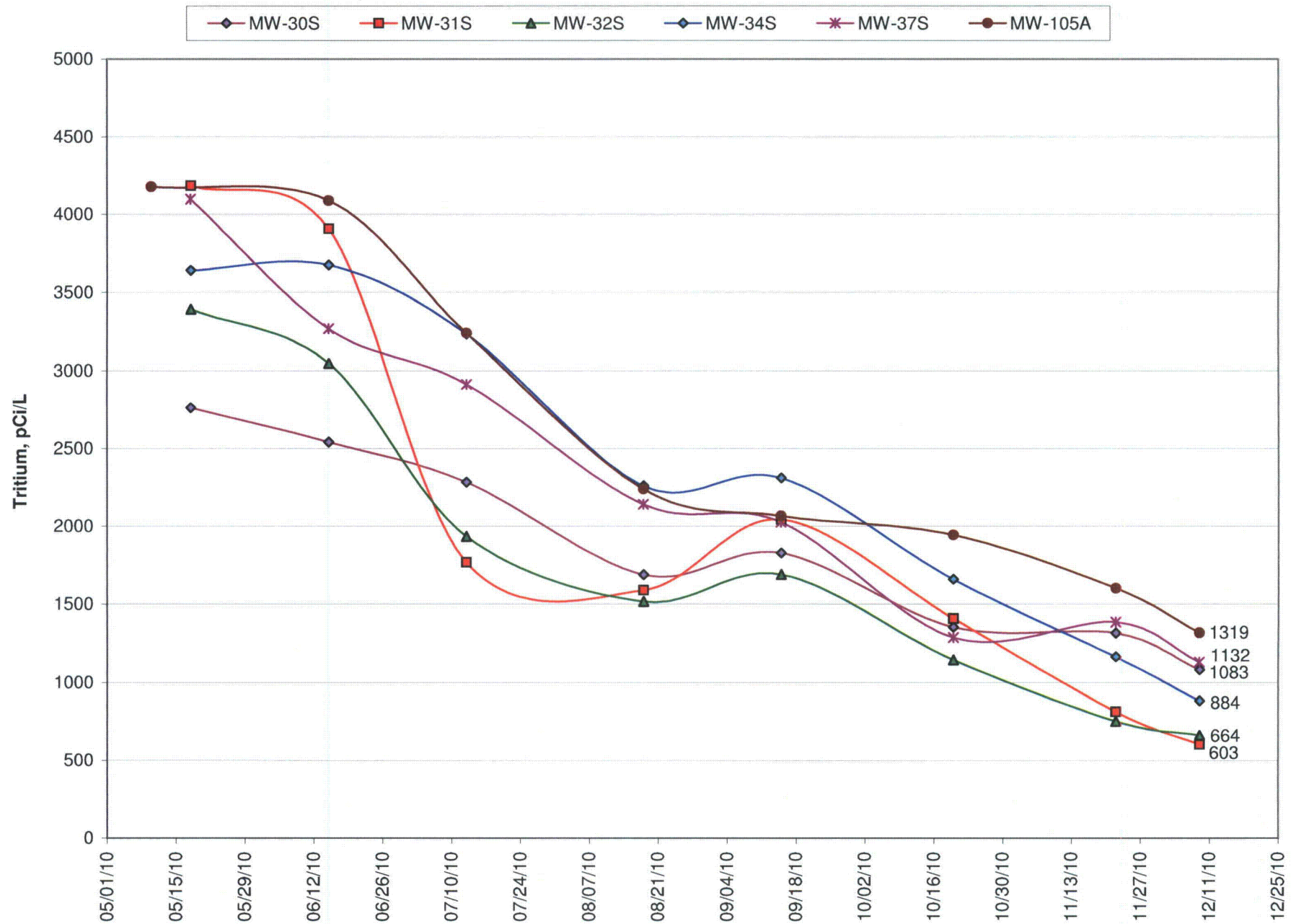
Station	Type	Date	Reporting Code	Parameter	Limit Type	Permit Limit	Reported Value
002	Limit	8/2/2010	00400	pH	Daily Conc.	9.0	9.1



### Groundwater Monitoring Wells Tritium



# Groundwater Monitoring Wells Tritium







## Environmental Justice and Socioeconomics

**EJS4.** Major annual support payments, one-time payments, and other forms of non-tax compensation provided to local organizations, communities, and jurisdictions on behalf of Davis-Besse.

- The following table provides the payments made to the local counties for their support. In addition, we provided radios for school buses and police services in the county which we maintained through the Backbone Radio Maintenance Contract line item. This activity will be paid for by the County beginning in 2011. The Non-Grant payments are for support of the Evaluated Emergency Exercises on odd years.

<b><u>Dues and Fees</u></b>	<b><u>2008</u></b>	<b><u>2009</u></b>	<b><u>2010</u></b>
Erie County Grant	\$ 21,000	\$ 26,000	\$ 26,000
Lucas County Grant	\$ 40,038	\$ 51,208	\$ 33,380
Ottawa County Grant	\$ 147,700	\$ 156,255	\$ 152,640
Sandusky County Grant	\$ 21,000	\$ 26,000	\$ 26,000
Backbone Radio Maintenance	\$ 232,008	\$ 223,998	\$ 217,061
Lucas County Emergency Operations Center (EOC)	\$ 15,000	\$ 15,000	\$ 15,000
Ottawa County EOC	\$ 15,000	\$ 15,000	\$ 15,000
Erie County Non-Grant	\$ -	\$ -	\$ -
Lucas County Non-Grant	\$ -	\$ 3,000	\$ -
Ottawa County Non-Grant	\$ -	\$ 4,585	\$ 195
Sandusky County Non-Grant	\$ 4,334	\$ 4,044	\$ -
Total	\$ 496,080	\$ 525,090	\$ 485,276



- The following community activities are supported by Davis-Besse employees:
  - Ottawa County Improvement Corporation – Site Director serves on the Executive Committee and Site Vice President is on the Board of Trustees and provide time and financial support.
  - Boy Scouts Camporee – a weekend in the fall where 200 scouts and leaders spend the weekend learning about and earn the Atomic Energy Merit Badge.
  - Blood Mobile – the Red Cross Blood Mobile has three to four blood drives each year on the site.
  - The Ottawa County Sheriff Department has their annual banquet in the Emergency Education Center.
  - Site Tours – Local groups such as the Historical Society have participated in the tour program.
  - Harvest for Hunger – Davis-Besse employees participate in this annual food drive to provide food to local families.
  - United Way – as part of the corporate drive, monies are withdrawn from paychecks to local organizations supported by the United Way.
  - Toys for Tots – collection once a year.
  - Homeless Shelters – Christmas collection by employees.
  - With over 700 employees, many are leaders in church, school, and civic organizations through out the area.

**EJS5.** Also, provide information about any changes in assessed property value or any other recent or anticipated payment adjustments that could result in notable increases or decreases in tax or other payments.

- Additional buildings on site will increase the property values. Buildings that are temporary could see an increase in property taxes for the time they are used but when taken down; the tax base would be reduced. When the permanent Containment Access Facility (CAF) and Warehouse buildings are completed, their cost will go into the fixed asset base for property tax applications.
- The Capital Projects for Plant Life Extension such as Replace the Steam Generators in 2014 will increase the fixed asset base and increase the property tax application.
- Materials Inventory is dynamic from year to year with increases in the odd years before outages and then lower balances at year end of the outage years. However, the general trend is to reduce the inventory and link into just in time inventory programs to support site maintenance work.





[illegible]



[illegible]

City	County	State	Total OH	Percent	Total MI	Percent	Total PA	Percent
Toledo	Lucas	Ohio						
Toledo	Lucas	Ohio						
Toledo	Lucas	Ohio						
Toledo	Lucas	Ohio						
Toledo	Lucas	Ohio						
Toledo	Lucas	Ohio						
Waterville	Lucas	Ohio						
Waterville	Lucas	Ohio						
Waterville	Lucas	Ohio						
Whitehouse	Lucas	Ohio						
Whitehouse	Lucas	Ohio	163	19.76				
Erie	Monroe	Michigan						
Lambertville	Monroe	Michigan						
LaSalle	Monroe	Michigan						
Luna Pier	Monroe	Michigan						
Monroe	Monroe	Michigan						
Monroe	Monroe	Michigan						
Petersburg	Monroe	Michigan						
South Rockwood	Monroe	Michigan						
Temperance	Monroe	Michigan						
Temperance	Monroe	Michigan						
Temperance	Monroe	Michigan						
Temperance	Monroe	Michigan						
Temperance	Monroe	Michigan						
Temperance	Monroe	Michigan			14	1.70		
Gibsonburg	Morrow	Ohio	1	0.12				
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Curtice	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Elmore	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						

City	County	State	Total OH	Percent	Total MI	Percent	Total PA	Percent
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Genoa	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Graytown	Ottawa	Ohio						
Gypsum	Ottawa	Ohio						
Lakeside	Ottawa	Ohio						
Lakeside	Ottawa	Ohio						
Lakeside	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Marblehead	Ottawa	Ohio						
Martin	Ottawa	Ohio						
Martin	Ottawa	Ohio						
Millbury	Ottawa	Ohio						





[illegible]

[illegible]

<b>City</b>	<b>County</b>	<b>State</b>	<b>Total OH</b>	<b>Percent</b>	<b>Total MI</b>	<b>Percent</b>	<b>Total PA</b>	<b>Percent</b>
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Port Clinton	Ottawa	Ohio						
Sandusky	Ottawa	Ohio						
Williston	Ottawa	Ohio						
Williston	Ottawa	Ohio						
Williston	Ottawa	Ohio						
Williston	Ottawa	Ohio						
Woodville	Ottawa	Ohio						
Woodville	Ottawa	Ohio	307	37.21				
Garrettsville	Portage	Ohio	1	0.12				
Sylvania	Putnam	Ohio	1	0.12				
Shelby	Richland	Ohio	1	0.12				

[illegible]

<b>City</b>	<b>County</b>	<b>State</b>	<b>Total OH</b>	<b>Percent</b>	<b>Total MI</b>	<b>Percent</b>	<b>Total PA</b>	<b>Percent</b>
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Fremont	Sandusky	Ohio						
Gibsonburg	Sandusky	Ohio						
Gibsonburg	Sandusky	Ohio						
Gibsonburg	Sandusky	Ohio						
Gibsonburg	Sandusky	Ohio						
Gibsonburg	Sandusky	Ohio						
Gibsonburg	Sandusky	Ohio						
Gibsonburg	Sandusky	Ohio						
Gibsonburg	Sandusky	Ohio						
Green Springs	Sandusky	Ohio						
Greensprings	Sandusky	Ohio						
Helena	Sandusky	Ohio						
Lindsey	Sandusky	Ohio						
Lindsey	Sandusky	Ohio						
Lindsey	Sandusky	Ohio						
Lindsey	Sandusky	Ohio						
Lindsey	Sandusky	Ohio						
Vickery	Sandusky	Ohio						
Vickery	Sandusky	Ohio						
Woodville	Sandusky	Ohio						



[illegible]







# ATTACHMENT EJS-3

**Table 3.4-1: Estimated Distribution of Davis-Besse Employee Residences,  
January 2009**

State	County	Percent of Workforce	Number of Workforce
Ohio	Ashland	0.12	1
	Clark	0.12	1
	Clyde	0.12	1
	Crawford	0.24	2
	Cuyahoga	0.12	1
	Erie	5.58	46
	Fulton	0.36	3
	Hancock	0.24	2
	Huron	1.09	9
	Lake	0.12	1
	Locus	0.12	1
	Lorain	0.24	2
	Lucas	19.76	163
	Morrow	0.12	1
	Ottawa	37.21	307
	Portage	0.12	1
	Putnam	0.12	1
	Richland	0.12	1
	Sandusky	15.03	124
	Seneca	1.45	12
	Summit	0.12	1
	Wood	15.52	128
	<i>Subtotal</i>	<i>98.06</i>	<i>809</i>
Michigan	Monroe	1.70	14
	Van Buren	0.12	1
	<i>Subtotal</i>	<i>1.82</i>	<i>15</i>
Pennsylvania	Beaver	0.12	1
	<i>Subtotal</i>	<i>0.12</i>	<i>1</i>
<b>OH, MI, PA</b>	<b>Total</b>	<b>100.00</b>	<b>825</b>



May 14, 2010

L-10-120

10 CFR 50.36a

ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:**

Davis-Besse Nuclear Power Station, Unit 1  
Docket Number 50-346, License Number NPF-3  
Combined Annual Radiological Environmental Operating Report and Radiological  
Effluent Release Report for the Davis-Besse Nuclear Power Station - 2009

In accordance with 10 CFR 50.36a(a)(2), this letter transmits the combined 2009 Annual Radiological Environmental Operating Report (AREOR) and Radiological Effluent Release Report (RERR) for the period January 2009 through December 2009. These annual reports are submitted for the Davis-Besse Nuclear Power Station (DBNPS). The AREOR and the RERR must be submitted by May 15 of each year to satisfy the requirements of the DBNPS Technical Specifications 5.6.1 and 5.6.2.

The Attachment provides a listing of the specific requirements detailed in the DBNPS Offsite Dose Calculation Manual (ODCM) and the portion of the AREOR which was prepared to meet each requirement.

The following information is also provided only to the Document Control Desk. This information includes:

- 2009 RERR Meteorological Data (on Compact Disc)
- Environmental, Inc. Midwest Laboratory, Monthly Progress Report for January through December 2009 (which contains the 2009 Radiological Environmental Monitoring Program Sample Analysis Results), dated February 11, 2010
- Davis-Besse ODCM, Revision 23, dated June 11, 2009

A009  
IE25  
IE48  
NRR

Davis-Besse Nuclear Power Station, Unit 1  
L-10-120  
Page 2 of 2

There are no regulatory commitments contained in this letter. If there are any questions or if additional information is required, please contact Ms. Polly Boissoneault, Manager - Site Chemistry, at (419) 321-8549.

Sincerely,



Brian D. Boles  
Director- Site Operations  
Davis-Besse Nuclear Power Station

KAS/AMP

Attachment: Summary Location(s) of Off-Site Dose Calculation Manual Requirements  
Contents in the Annual Radiological Environmental Operating Report

Enclosure: Annual Radiological Environmental Operating Report, including the  
Radiological Effluent Release Report for the Davis-Besse Nuclear Power  
Station - 2009

cc: Regional Administrator, NRC Region III  
DB-1 NRC Senior Resident Inspector  
DB-1 NRC/NRR Project Manager  
Chief, Division of Reactor Safety, Branch 6  
Utility Radiological Safety Board

**Summary Location(s) of Off-Site Dose Calculation Manual Requirements  
Contents in the Annual Radiological Environmental Operating Report**

Description of Requirement

- Summaries, interpretations, and analyses of trends of the radiological environmental surveillance activities, and an assessment of the observed impacts of the plant (pages 31 through 80 and Appendix D)
- Results of the Land Use Census (pages 111 through 116)
- Results of the analysis of radiological environmental samples and of environmental radiation measurements (Environmental, Inc. Midwest Laboratory, Monthly Progress Report for January through December 2009 (pages 26 through 80))
- Summary description of the radiological environmental monitoring program (also pages 26 through 80)
- At least two legible maps, covering sampling locations keyed to a table giving distances and directions from the centerline of one reactor (pages 40 through 77)
- The results of licensee participation in the Inter-laboratory Comparison Program (Appendix A)
- Discussion of cases in which collection of specimens had irregularities due to malfunction of automatic sampling equipment and other legitimate reasons (page 36)

L-10-120  
Enclosure

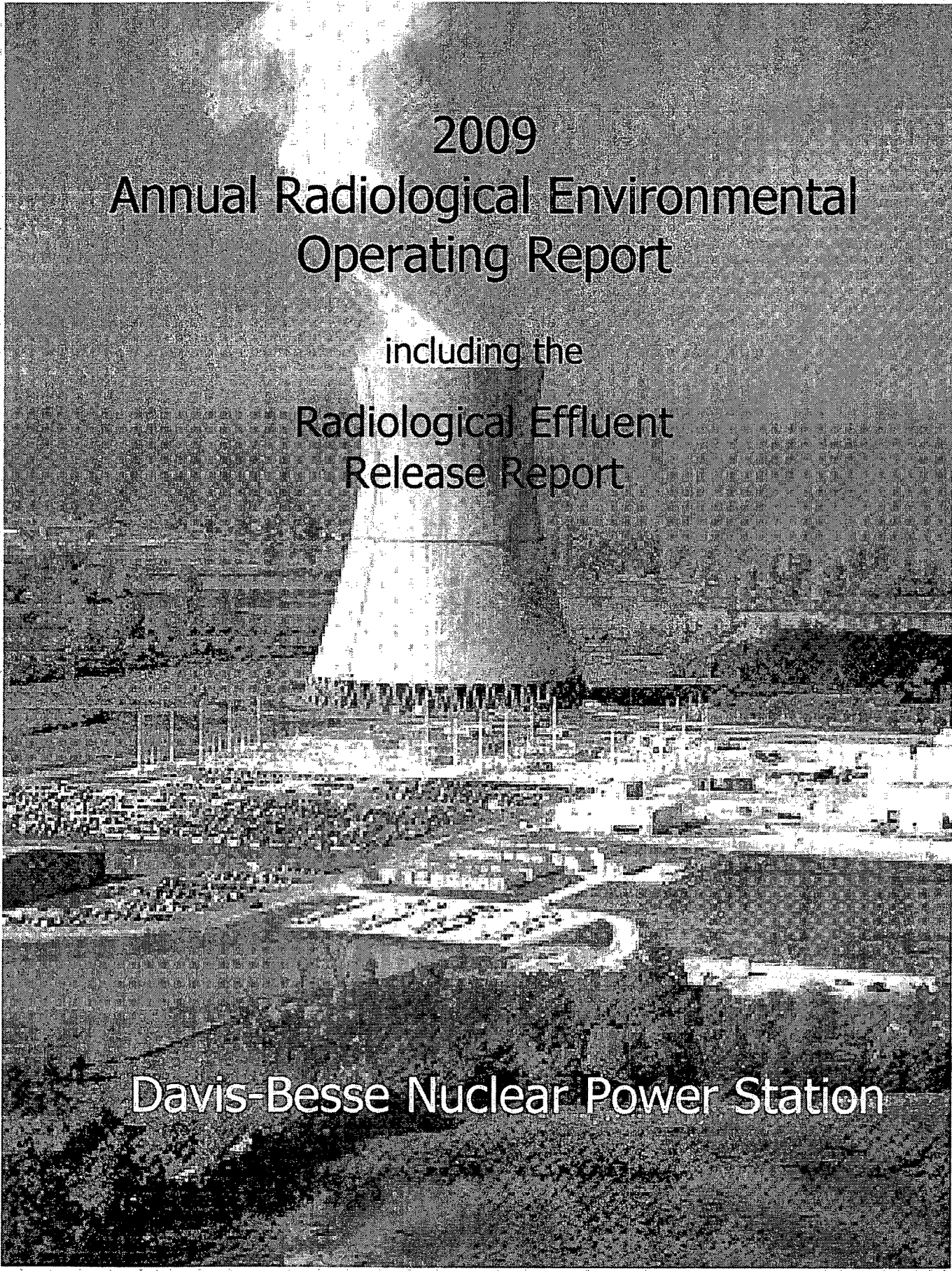
**Annual Radiological Environmental Operating Report, including the  
Radiological Effluent Release Report**

**for the**

**Davis-Besse Nuclear Power Station - 2009**

**(1 Report follows)**





# 2009 Annual Radiological Environmental Operating Report

including the  
Radiological Effluent  
Release Report

Davis-Besse Nuclear Power Station

---

# ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

---

**Davis-Besse Nuclear Power Station  
January 1, 2009 through December 31, 2009**

**Davis-Besse Nuclear Power Station**

**May 2010**

---

# TABLE OF CONTENTS

---

<b><u>Title</u></b>	<b><u>Page</u></b>
<b>List of Tables</b>	iv
<b>List of Figures</b>	vi
<b>Executive Summary</b>	viii
<b>INTRODUCTION</b>	
Fundamentals	1
Radiation and Radioactivity	2
Interaction with Matter	3
Quantities and Units of Measurement	5
Sources of Radiation	7
Health Effects of Radiation	9
Health Risks	10
Benefits of Nuclear Power	11
Nuclear Power Production	11
Station Systems	16
Reactor Safety and Summary	19
Radioactive Waste	19
Description of the Davis-Besse Site	22
References	24
<b>RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM</b>	
Introduction	26
Pre-Operational Surveillance Program	26
Operational Surveillance Program Objectives	27
Quality Assurance	27
Program Description	28
Sample Analysis	32
Sample History Comparison	34

<b><u>Title</u></b>	<b><u>Page</u></b>
<b>RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (continued)</b>	
2009 Program Anomalies	36
Atmospheric Monitoring	36
Terrestrial Monitoring	43
Aquatic Monitoring	55
Direct Radiation Monitoring	67
Conclusion	78
References	78
<b>RADIOACTIVE EFFLUENT RELEASE REPORT</b>	
Protection Standards	81
Sources of Radioactivity Released	81
Processing and Monitoring	82
Exposure Pathways	83
Dose Assessment	84
Results	85
Regulatory Limits	86
Effluent Concentration Limits	87
Average Energy	87
Measurements of Total Activity	87
Batch Releases	88
Abnormal Releases	88
Percent of Offsite Dose Calculation Manual (ODCM) Release Limits	88
Sources of Input Data	89
Dose to Public Due to Activities Inside the Site Boundary	89
Inoperable Radioactive Effluent Monitoring Equipment	90
Changes to The ODCM and Process Control Plan (PCP)	90
Borated Water Storage Tank Radionuclide Concentrations	90
Onsite Groundwater Monitoring	106
<b>LAND USE CENSUS</b>	
Program Design	111
Methodology	111
Results	112

<b><u>Title</u></b>	<b><u>Page</u></b>
<b>NON-RADIOLOGICAL ENVIRONMENTAL PROGRAMS</b>	
Meteorological Monitoring	117
On-Site Meteorological Monitoring	118
Land and Wetlands Management	133
Water Treatment Plant Operation	134
Chemical Waste Management	137
Other Environmental Regulating Acts	138
Other Environmental Programs	140
<b>APPENDICES</b>	
<b>Appendix A: Interlaboratory Comparison Program Results</b>	<b>141</b>
<b>Appendix B: Data Reporting Conventions</b>	<b>158</b>
<b>Appendix C: Maximum Permissible Concentrations of Radioactivity in Air and Water Above Background in Unrestricted Areas</b>	<b>160</b>
<b>Appendix D: REMP Sampling Summary</b>	<b>162</b>

## List of Tables

<b><u>Title</u></b>	<b><u>Table Number</u></b>	<b><u>Page Number</u></b>
Risk Factors: Estimated Decrease in Average Life Expectancy	1	10
Sample Codes and Collection Frequencies	2	30
Sample Collection Summary	3	31
Radiochemical Analyses Performed on REMP Samples	4	33
Air Monitoring Stations	5	39
Milk Monitoring Location	6	44
Groundwater Monitoring Locations	7	46
Broadleaf Vegetation and Fruit Locations	8	47
Animal/Wildlife Feed Locations	9	48
Wild Meat Locations	10	49
Soil Locations	11	51
Treated Surface Water Locations	12	57
Untreated Surface Water Locations	13	60
Shoreline Sediment Locations	14	61
Fish Locations	15	63
Thermoluminescent Dosimeter Locations	16	69
Gaseous Effluents – Summation of All Releases	17	91
Gaseous Effluents – Ground Level Releases – Batch Mode	18	92
Gaseous Effluents – Ground Level Releases - Continuous Mode	18	93
Ground Level Releases – LLDs for Continuous and Batch Mode	18	94
Gaseous Effluents – Mixed Mode Releases –Batch Mode	19	95
Gaseous Effluents – Mixed Mode Releases – Continuous Mode	19	96
LLDs for Gaseous Effluents – Mixed Mode Releases	19	97
Liquid Effluents – Summation of All Releases	20	98
Liquid Effluents – Nuclides Released in Batch Releases	21	99

<b><u>Title</u></b>	<b><u>Table Number</u></b>	<b><u>Page Number</u></b>
Liquid Effluents – Nuclides Released in Continuous Releases	21	101
Liquid Effluents – LLDs for Nuclides Released	21	102
Liquid Effluents – Solid Waste and Irradiated Fuel Shipments	22	103
Groundwater Monitoring Wells Sampled in 2009	23	106
Doses Due to Gaseous Releases for January through December 2009	24	108
Doses Due to Liquid Releases for January through December 2009	25	109
Annual Dose to the Most Exposed (from all pathways) Member of the Public 2009	26	110
Closest Exposure Pathways Present in 2009	27	114
Pathway Locations and Corresponding Atmospheric Dispersion (X/Q) and Deposition (D/Q) Parameters	28	116
Summary of Meteorological Data Recovery for 2009	29	122
Summary of Meteorological Data Measured for 2009	30	123
Joint Frequency Distribution by Stability Class	31	128

---

## List of Figures

---

<u>Description</u>	<u>Figure Number</u>	<u>Page Number</u>
The Atom	1	1
Principal Decay Scheme of the Uranium Series	2	3
Range and Shielding of Radiation	3	4
Sources of Exposure to the Public	4	8
Fission Diagram	5	12
Fuel Rod, Fuel Assembly, Reactor Vessel	6	13
Station Systems	7	15
Dry Fuel Storage Module Arrangement	8	21
Map of Area Surrounding Davis-Besse	9	22
2009 Airborne Gross Beta	10	38
Air Sample Site Map	11	40
Air Samples 5-mile Map	12	41
Air Sample 25-mile Map	13	42
Gross Beta Groundwater 1982-2009	14	45
Cs-137 in Soil 1972-2008	15	50
Terrestrial Site Map	16	52
Terrestrial 5-mile Map	17	53
Terrestrial 25-mile Map	18	54
Gross Beta in Treated Surface Water 1972-2009	19	56
Gross Beta Concentration in Untreated Surface Water 1977-2009	20	59
Gross Beta in Fish 1972-2009	21	62
Aquatic Site Map	22	64
Aquatic 5-mile Map	23	65
Aquatic 25-mile Map	24	66
Gamma Dose for Environmental TLDs 1973 – 2009	25	68
TLD Site Map	26	75
TLD 5-mile Map	27	76
TLD 25-mile Map	28	77
Exposure Pathways	29	84



<b><u>Description</u></b>	<b><u>Figure Number</u></b>	<b><u>Page Number</u></b>
Davis-Besse Onsite Groundwater Monitoring H-3 Trends	30	107
Land Use Census Map	31	113
Wind Rose Annual Average 100M	32	125
Wind Rose Annual Average 75M	33	126
Wind Rose Annual Average 10M	34	127

---

## Executive Summary

---

The Annual Radiological Environmental Operating Report (AREOR) is a detailed report on the Environmental Monitoring Programs conducted at the Davis-Besse Nuclear Power Station from January 1 through December 31, 2009. This report meets all of the requirements in Regulatory Guide 4.8, Section 5.6 of Davis-Besse Improved Standard Technical Specifications, and Davis-Besse Offsite Dose Calculation Manual (ODCM) Section 7.1. Reports included are the Radiological Environmental Monitoring Program, Radiological Effluents Release Report, Land Use Census, Groundwater Monitoring, and the Non-Radiological Environmental Programs, which consist of Meteorological Monitoring, Land and Wetland Management, Water Treatment, Chemical Waste Management, and Waste Minimization and Recycling.

### Radiological Environmental Monitoring Program

The Radiological Environmental Monitoring Program (REMP) is established to monitor the radiological condition of the environment around Davis-Besse. The REMP is conducted in accordance with Regulatory Guide 4.8, Davis-Besse Improved Technical Specifications, and the Davis-Besse ODCM, Section 6.0. This program includes the sampling and analysis of environmental samples and evaluating the effects of releases of radioactivity on the environment.

Radiation levels and radioactivity have been monitored within a 25-mile radius around Davis-Besse since 1972. The REMP was established at Davis-Besse about five years before the Station became operational. This pre-operational sampling and analysis program provided data on radiation and radioactivity normally present in the area as natural background. Davis-Besse has continued to monitor the environment by sampling air, groundwater, milk, wild meat, fruit and vegetables, wild animal feed, drinking water, surface water, fish, shoreline sediment, and by direct measurement of radiation.

Samples are collected from Indicator and Control locations. Indicator locations are within 5 miles of the site and are expected to show naturally occurring radioactivity plus any increases of radioactivity that might occur due to the operation of Davis-Besse. Control locations are farther away from the Station and are expected to indicate the presence of only naturally occurring radioactivity. The results obtained from the samples collected from indicator locations are compared with the results from those collected from control locations and with the concentrations present in the environment before Davis-Besse became operational. This allows for the assessment of any impact the operation of Davis-Besse might have had on the surrounding environment.

Over 2,000 radiological environmental samples were collected and analyzed in 2009. An explanation for the sample anomalies for this reporting period is provided on page 36.

The results of the REMP indicate that Davis-Besse continues to be operated safely in accordance with applicable federal regulations. No significant increase above background radiation or radioactivity is attributed to the operation of Davis-Besse.

The sampling results are divided into four sections: atmospheric monitoring, terrestrial monitoring, aquatic monitoring and direct radiation monitoring.

Air samples are continuously monitored at ten locations. Four samples are collected onsite. The other six are located between one-half and twenty-two miles away. Particulate filters and iodine cartridges are collected weekly. The 2009 indicator results were in close agreement with the samples collected at control locations.

Terrestrial monitoring includes analysis of milk, groundwater, meat, fruits, vegetables, animal feed, and soil samples. Samples are collected onsite and up to twenty-five miles away, depending on the type of sample. Results of terrestrial sample analyses indicate concentrations of radioactivity similar to previous years and indicate no build-up of radioactivity due to the operation of Davis-Besse.

Aquatic monitoring includes the collection and analysis of drinking water, untreated surface water, fish and shoreline sediments from onsite and the vicinity of Lake Erie. Two samples of untreated surface water contained tritium at concentrations above the lower limit of detection of 330 pCi/liter. The April sample of indicator sample T-3 showed a tritium concentration of 901 pCi/l and the September sample at T-22 showed 739 pCi/l of tritium. The tritium in the samples is likely from operation of the plant, and is well below the 20,000 pCi/liter EPA drinking water limit. The 2009 results of analysis for fish, drinking water and shoreline sediment indicate normal background concentration of radionuclides and show no increase or build-up of radioactivity due to the operation of Davis-Besse.

Direct radiation averaged 16.3 mrem/91 days at indicator locations and 17.6 mrem/91 days at control locations, which is similar to results from previous years and indicates no influence on the surrounding environment from the operation of the plant during 2009.

The operation of Davis-Besse in 2009 caused no significant increase in the concentrations of radionuclides or adverse effects on the quality of the environment surrounding the plant. Radioactivity released in the Station's effluents was well below the applicable federal regulatory limits. The estimated radiation dose to the general public due to the operation of Davis-Besse in 2009 was well below all applicable regulatory limits.

In order to estimate radiation dose to the public, the pathways through which public exposure can occur must be known. To identify these exposure pathways, an Annual Land Use Census is performed as part of the REMP. During the census, Station personnel travel every public road within a radius of five miles of Davis-Besse to locate radiological exposure pathways (e.g., residences, vegetable gardens, milk cows/goats, etc.). The most important pathway is the one that, for a specific radionuclide, provides the greatest dose to a sector of the population. This is called the critical pathway. The critical pathway for 2009 was a garden in the West sector 1,560 meters from Davis-Besse, and is unchanged from 2008.

## Radiological Effluent Release Report

The Radiological Effluent Release Report (RERR) is a detailed listing of radioactivity released from the Davis-Besse Nuclear Power Station during the period January 1 through December 31, 2009. The doses due to radioactivity released during this period were only a fraction of what is allowed by our operating license.

The Total Body doses to an individual and population in an unrestricted area due to direct radiation from Davis-Besse is not distinguishable from background. These doses represent an extremely small fraction of the limits set by the NRC or the limits set in the ODCM.

No unplanned gaseous releases occurred during 2009, nor were there any abnormal liquid releases during the year.

There were no revisions of the Process Control Program (PCP) and one revision of the Off-site Dose Calculation Manual (ODCM) during 2009.

## Groundwater Protection Initiative

Davis-Besse began monitoring groundwater wells near the plant in 2007 in order to determine whether there have been any inadvertent releases of radioactivity that have impacted groundwater or could potentially affect local water supplies. In addition to several pre-construction wells, 16 new monitoring wells were drilled in 2007, which are sampled on a semi-annual basis. Any well with over 2,000 pCi/l tritium requires courtesy notification of state, county and local officials.

In spring of 2009, the tritium concentration in pre-construction well MW-34S was 2,352 pCi/l. Courtesy notifications detailing this event were made to the NRC, State of Ohio, and Lucas and Ottawa County officials on June 10, 2009. The well was resampled on 6/15/09 and was less than 2,000 pCi/l.

Notifications were made again to the NRC, State of Ohio, and Lucas and Ottawa County officials on December 29, 2009, after receiving results of the October well samples. GPI monitoring well sample MW-105A contained 2,285 pCi/l tritium. This tritium concentration was initially attributed to the leaking underground condensate line repaired in December, 2008, and is currently under active investigation to determine its source.

The wells that show tritium activity are located in the Protected Area near the plant, and are not used for drinking water purposes. The tritium concentrations found were all below the 30,000 pCi/liter EPA limit for non-drinking water sources. Sampling of these wells is normally performed on a semi-annual basis, or as often as needed.

## Non-Radiological Environmental Programs

### Meteorological Monitoring

The Meteorological Monitoring Program at Davis-Besse is part of a program for evaluating the radiological effects of the routine operation of Davis-Besse on the surrounding environment. Meteorological monitoring began in October of 1968.

Meteorological data recorded at Davis-Besse include wind speed, wind direction, sigma theta (standard deviation of wind direction), ambient temperature, differential temperature, dew point and precipitation. Two instrument-equipped meteorological towers are used to collect data. Data recovery for the five instruments that are operationally required by Davis-Besse Technical Requirements Manual was 99.99%.

## Marsh Management

FirstEnergy owns the Navarre Marsh. It is leased to the U.S. Fish and Wildlife Service, who manage it as part of the Ottawa National Wildlife Refuge.

The Davis-Besse site currently has two active American Bald Eagle nests on the property. A total of twenty-two healthy eaglets have fledged from Davis-Besse nests since 1995, including five in 2009.

## Water and Wastewater Treatment

Davis-Besse withdraws water from Lake Erie and processes it through a vendor-supplied water treatment process to produce the high-purity water used in the Station's cooling systems.

Since December 1, 1998, the Carroll Township Water Treatment Plant has provided for domestic water needs at Davis-Besse.

Sewage is treated at the Davis-Besse Wastewater Treatment Plant (WWTP) and its effluent is pumped to a settling basin. Following a retention period, this water is discharged with other Station liquid effluents back to Lake Erie.

## Chemical Waste Management

The Chemical Waste Management Program at Davis-Besse was developed to ensure that the off-site disposal of non-radioactive hazardous and nonhazardous chemical wastes is performed in accordance with all applicable state and federal regulations. Chemical waste disposal vendors contracted by Davis-Besse use advanced technology for offsite disposal, including recycling of chemical wastes, in order to protect human health and the environment.

In 2009, the Davis-Besse Nuclear Power Station generated approximately 2,250 pounds of hazardous waste. Non-hazardous wastes generated include 3,000 gallons of used oil, latex paints, caulks and grout.

As required by Superfund Amendment and Reauthorization Act (SARA), Davis-Besse reported hazardous products and chemicals to local fire departments and local and state planning commissions. As part of the program to remove PCB fluid from Davis-Besse, all electrical transformers have been retrofilled and reclassified as non-PCB transformers.

## Waste Minimization and Recycling

The Waste Minimization and Recycling Program at Davis-Besse began in 1991 with the collection and recycling of paper. This program was expanded and reinforced during 1993 to include the recycling of paper, aluminum cans, cardboard, and metal. Paper and cardboard recycling typically exceeds 50 tons annually. The scrap metal collected onsite is sold to scrap companies.

## Appendices

Appendix A contains results from the Interlaboratory Comparison Program required by Davis-Besse Technical Specifications. Samples with known concentrations of radioisotopes are prepared by the Environmental Resources Associates (ERA), and then sent (with information on sample type and date of collection only) to the laboratory contracted by the Davis-Besse Nuclear Power Station to analyze its REMP samples. The Environmental Resources Associates (ERA) compares results to known standards.

Appendix B contains data reporting conversions used in the REMP at Davis-Besse. The appendix provides an explanation of the format and computational methods used in reporting REMP data. Information on counting uncertainties and the calculations of averages and standard deviations are also provided.

Appendix C lists the effluent concentration limits for alpha and beta-emitting radioisotopes and for certain other radioisotopes in air and water samples. These concentrations are taken directly from the Code of Federal Regulations, and provide comparison values for actual REMP sampling results for 2009.

Appendix D provides a REMP sampling summary from 2009. The appendix provides a listing of the following for each sample type:

- number and type of analysis performed
- lower limit of detection for each analysis
- mean and range of results for control and indicator locations
- mean, range, and description of location with highest annual mean
- number of non-routine results

For detailed studies, Appendix D provides more specific information than that listed in this report. The information presented in Appendices A through D was provided by Environmental, Inc. Midwest Laboratory in their Final Progress Report to Davis-Besse (February, 2010).

## Introduction

Coal, oil, natural gas and hydropower are used to run this nation's electric generating stations; however, each method has its drawbacks. Coal-fired power can affect the environment through mining, acid rain and air pollution. Oil and natural gas are in limited supply and are, therefore, costly. Hydropower is limited due to the environmental impact of damming our waterways and the scarcity of suitable sites.

Nuclear power provides a readily available source of energy. The operation of nuclear power stations has a very small impact on the environment. In fact, the Davis-Besse Nuclear Power Station is surrounded by hundreds of acres of marshland, which make up part of the Ottawa National Wildlife Refuge. In order to provide better understanding of this unique source of energy, background information on basic radiation characteristics, risk assessment, reactor operation and effluent control is provided in this section.

## Fundamentals

### The Atom

All matter consists of **atoms**. Simply described, atoms are made up of positively and negatively charged particles, and particles which are neutral. These particles are called **protons**, **electrons**, and **neutrons**, respectively (Figure 1). The relatively large protons and neutrons are packed tightly together in a cluster at the center of the atom called the **nucleus**. Orbiting around the nucleus are one or more smaller electrons. In an electrically neutral atom the negative charges of the electrons are balanced by the positive charges of the protons. Due to their dissimilar charges, the protons and electrons have a strong attraction for each other. This holds the atom together. Other attractive forces between the protons and neutrons keep the densely packed protons from repelling each other, and prevent the nucleus from breaking apart.

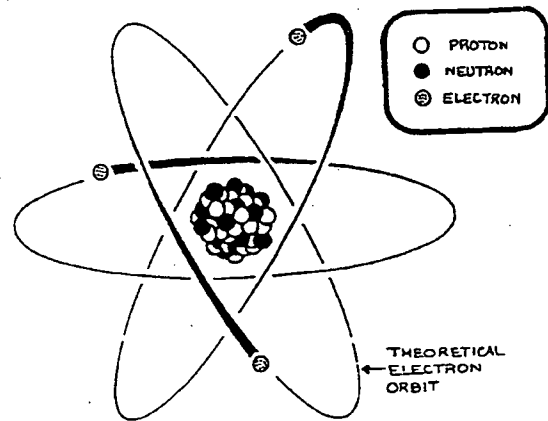


Figure 1: An atom consists of two parts: a nucleus containing positively charged protons and electrically neutral neutrons and one or more negatively charged electrons orbiting the nucleus. Protons and neutrons are nearly identical in size and weight, while each is about 2000 times heavier than an electron.

## Radiation and Radioactivity

### Isotopes and Radionuclides

A group of identical atoms containing the same number of protons make up an **element**. In fact, the number of protons an atom contains determines its chemical identity. For instance, all atoms with one proton are hydrogen atoms, and all atoms with eight protons are oxygen atoms. However, the number of neutrons in the nucleus of an element may vary. Atoms with the same number of protons but different numbers of neutrons are called **isotopes**. Different isotopes of the same element have the same chemical properties, and many are stable or nonradioactive. An unstable or radioactive isotope of an element is called a **radioisotope**, a **radioactive atom**, or a **radionuclide**. Radionuclides usually contain an excess amount of energy in the nucleus. The excess energy is usually due to a surplus or deficit in the number of neutrons in the nucleus. Radionuclides such as Uranium-238, Beryllium-7 and Potassium-40 occur naturally. Others are man-made, such as Iodine-131, Cesium-137, and Cobalt-60.

### Radiation

**Radiation** is simply the conveyance of energy through space. For instance, heat emanating from a stove is a form of radiation, as are light rays, microwaves, and radio waves. **Ionizing radiation** is another type of radiation and has similar properties to those of the examples listed above. Ionizing radiation consists of both **electromagnetic radiation** and **particulate radiation**. Electromagnetic radiation is energy with no measurable mass that travels with a wave-like motion through space. Included in this category are **gamma rays** and **X-rays**. Particulate radiation consists of tiny, fast moving particles which, if unhindered, travel in a straight line through space. The three types of particulate radiation of concern to us are **alpha particles**, which are made up of 2 protons and 2 neutrons; **beta particles**, which are essentially free electrons; and **neutrons**. The properties of these types of radiation will be described more fully in the Range and Shielding section.

### Radioactive Decay

Radioactive atoms, over time, will reach a stable, non-radioactive state through a process known as **radioactive decay**. Radioactive decay is the release of energy from an atom through the emission of ionizing radiation. Radioactive atoms may decay directly to a stable state or may go through a series of decay stages, called a **radioactive decay series**, and produce several **daughter products** that eventually result in a stable atom. The loss of energy and/or matter through radioactive decay may transform the atom into a chemically different element. For example, when Uranium-238 decays, it emits an alpha particle and, as a result, the atom loses 2 protons and 2 neutrons. As discussed previously, the number of protons in the nucleus of an atom determines its chemical identity. Therefore, when the Uranium-238 atom loses the 2 protons and 2 neutrons, it is transformed into an atom of Thorium-234. Thorium-234 is one of the 14 successive daughter products of Uranium-238. Radon is another daughter product, and the series ends with stable Lead-206.



This example is part of a known radioactive decay series, called the Uranium series, which begins with Uranium-238 and ends with Lead-206 (Figure 2).

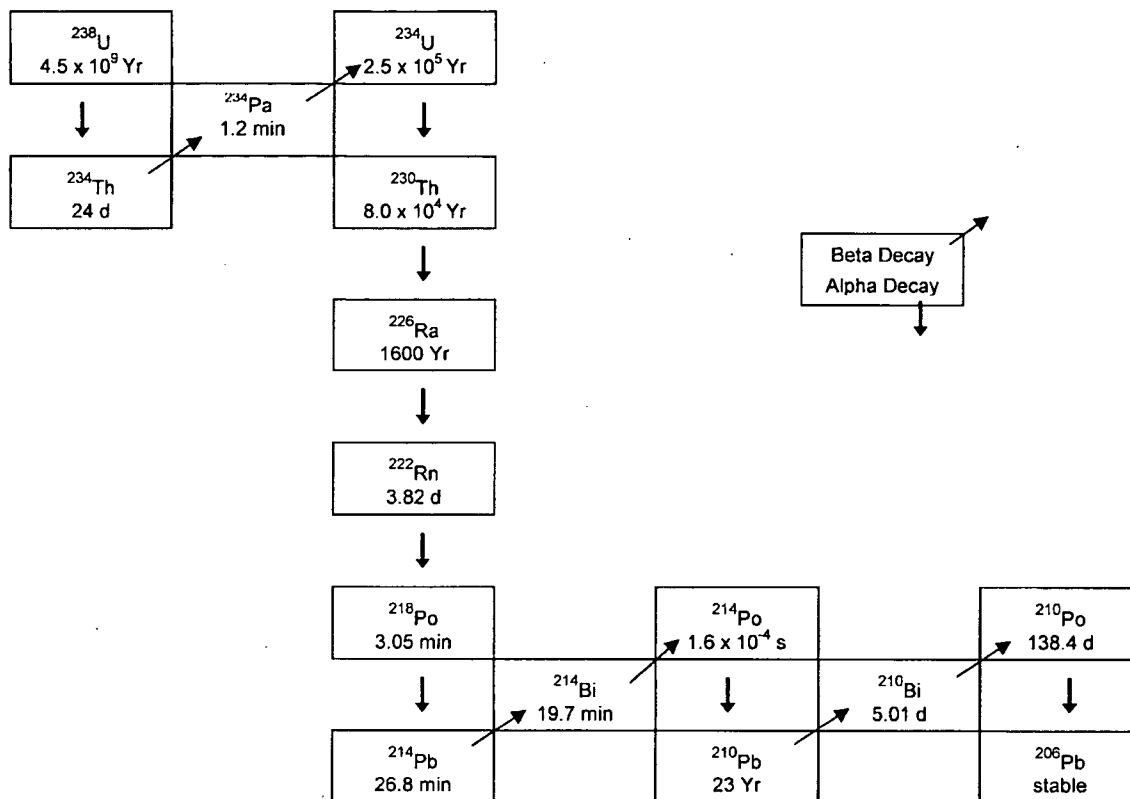


Figure 2: Principal Decay Scheme of the Uranium Series.

## Half-life

Most radionuclides vary greatly in the frequency with which their atoms release radiation. Some radioactive materials, in which there are only infrequent emissions, tend to have a very long half-lives. Those radioactive materials that are very active, emitting radiation more frequently, tend to have comparably shorter half-lives. The length of time an atom remains radioactive is defined in terms of **half-lives**. Half-life is the amount of time required for a radioactive substance to lose half of its activity through the process of radioactive decay. Half-lives vary from millionths of a second to millions of years.

## Interaction with Matter

### Ionization

Through interactions with atoms, alpha, beta, and gamma radiation lose their energy. When these forms of radiation interact with any form of material, the energy they impart may cause

atoms in that material to become **ions**, or charged particles. Normally, an atom has the same number of protons as electrons. Thus, the positive and negative charges cancel, and the atom is electrically neutral. When one or more electrons are removed an ion is formed. Ionization is one of the processes that may result in damage to biological systems.

## Range and Shielding

Particulate and electromagnetic radiation each travel through matter differently because of their different properties. Alpha particles contain 2 protons and 2 neutrons, are relatively large, and carry an electrical charge of +2. Alpha particles are ejected from the nucleus of a radioactive atom at speeds ranging from 2,000 to 20,000 miles per second. However, due to its comparatively large size, an alpha particle usually does not travel very far before it loses most of its energy through collisions and interactions with other atoms. As a result, a sheet of paper or a few centimeters of air can easily stop alpha particles (Figure 3).

Beta particles are very small, and comparatively fast particles, traveling at speeds near the speed of light (186,000 miles per second). Beta particles have an electrical charge of either +1 or -1. Because they are so small and have a low charge, they do not collide and interact as often as alpha particles, so they can travel farther. Beta particles can usually travel through several meters of air, but may be stopped by a thin piece of metal or wood.

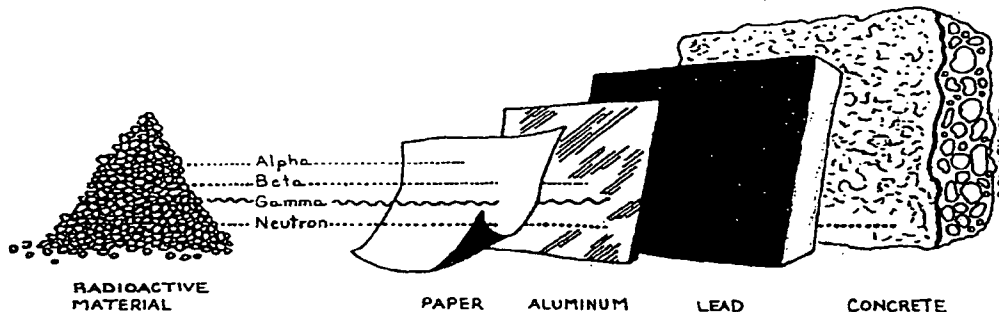


Figure 3: As radiation travels, it collides and interacts with other atoms and loses energy. Alpha particles can be stopped by a sheet of paper, and beta particles by a thin sheet of aluminum. Gamma radiation is shielded by highly dense materials such as lead, while hydrogenous materials (those containing hydrogen atoms), such as water and concrete, are used to stop neutrons.

Gamma rays are pure energy and travel at the speed of light. They have no measurable charge or mass, and generally travel much farther than alpha or beta particles before being absorbed. After repeated interactions, the gamma ray finally loses all of its energy and vanishes. The range of a gamma ray in air varies, depending on the ray's energy and interactions. Very high-energy gamma radiation can travel a considerable distance, whereas low energy gamma radiation may travel only a few feet in air. Lead is used as shielding material for gamma radiation because of its density. Several inches of Lead or concrete may be needed to effectively shield gamma rays.

Neutrons come from several sources, including the interactions of cosmic radiation with the earth's atmosphere and nuclear reactions within operating nuclear power reactors. However, neutrons are not of environmental concern since the neutron source at nuclear power stations is sealed within the containment building.

Because neutrons have no charge, they are able to pass very close to the nuclei of the material through which they are traveling. As a result, neutrons may be captured by one of these nuclei or they may be deflected. When deflected, the neutron loses some of its energy. After a series of these deflections, the neutron has lost most of its energy. At this point, the neutron moves about as slowly as the atoms of the material through which it is traveling, and is called a **thermal neutron**. In comparison, fast neutrons are much more energetic than thermal neutrons and have greater potential for causing damage to the material through which they travel. Fast neutrons can have from 200 thousand to 200 million times the energy of thermal neutrons.

Neutron shielding is designed to slow fast neutrons and absorb thermal neutrons. Neutron shielding materials commonly used to slow neutrons down are water or polyethylene. The shield is then completed with a material such as Cadmium, to absorb the now thermal neutrons. At Davis-Besse, concrete is used to form an effective neutron shield because it contains water molecules and can be easily molded around odd shapes.

## Quantities and Units of Measurement

There are several quantities and units of measurement used to describe radioactivity and its effects. Three terms of particular usefulness are **activity**, **absorbed dose**, and **dose equivalent**.

### Activity: Curie

**Activity** is the number of atoms in a sample that disintegrate (decay) per unit of time. Each time an atom disintegrates, radiation is emitted. The **curie** (Ci) is the unit used to describe the activity of a material and indicates the rate at which the atoms of a radioactive substance are decaying. One curie indicates the disintegration of 37 billion atoms per second.

A curie is a unit of activity, not a quantity of material. Thus, the amount of material required to produce one curie varies. For example, one gram (1/28th of an ounce) of radium-226 is the equivalent of one curie of activity, but it would take 9,170,000 grams (about 10 tons) of thorium-232 to equal one curie.

Smaller units of the curie are often used, especially when discussing the low concentrations of radioactivity detected in environmental samples. For instance, the microcurie (uCi) is equal to one millionth of a curie, while the picocurie (pCi) represents one trillionth of a curie.

## Absorbed Dose: Rad

**Absorbed dose** is a term used to describe the radiation energy absorbed by any material exposed to ionizing radiation, and can be used for both particulate and electromagnetic radiation. The **Rad (radiation absorbed dose)** is the unit used to measure the absorbed dose. It is defined as the energy of ionizing radiation deposited per gram of absorbing material (1 Rad = 100 erg/gm). The rate of absorbed dose is usually given in Rad/hr.

If the biological effect of radiation is directly proportional to the energy deposited by radiation in an organism, the Rad would be a suitable measurement of the biological effect. However, biological effects depend not only on the total energy deposited per gram of tissue, but on how this energy is distributed along its path. Experiments have shown that certain types of radiation are more damaging per unit path of travel than are others. Thus, another unit is needed to quantify the biological damage caused by ionizing radiation.

## Dose Equivalent: Rem

Biological damage due to alpha, beta, gamma and neutron radiation may result from the ionization caused by this radiation. Some types of radiation, especially alpha particles which cause dense local ionization, can result in up to 20 times the amount of biological damage for the same energy imparted as do gamma or X-rays. Therefore, a **quality factor** must be applied to account for the different ionizing capabilities of various types of ionizing radiation. When the quality factor is multiplied by the absorbed dose, the result is the **dose equivalent**, which is an estimate of the possible biological damage resulting from exposure to a particular type of ionizing radiation. The dose equivalent is measured in **rem (radiation equivalent man)**.

An example of this conversion from absorbed dose to dose equivalent uses the quality factor for alpha radiation, which is equal to 20. Thus, 1 Rad of alpha radiation is approximately equal to 20 rem. Beta and gamma radiation each have a quality factor of 1, therefore one Rad of either beta or gamma radiation is approximately equal to one rem. Neutrons have a quality factor ranging from 2 to 10. One rem produces the same amount of biological damage, regardless of the source. In terms of radiation, the rem is a relatively large unit. Therefore, a smaller unit, the **millirem**, is often used. One millirem (mrem) is equal to 1/1,000 of a rem.

## Deep Dose Equivalent (DDE)

Deep dose equivalent is the measurement of dose within the body, from sources of radiation that are external to the body. It is what is measured and recorded on thermoluminescent dosimeters (TLDs), film badges or other dosimeters. For example, at Davis-Besse or at any hospital that has x-ray equipment, you will see people wearing these devices. These instruments are worn to measure DDE.

## Committed Effective Dose Equivalent (CEDE)

Committed effective dose equivalent is a measure of the dose received from any radioactive material taken into the body. It is calculated from the sum of the products of the committed dose

equivalent to the organ or tissue multiplied by the organ or tissue-weighting factor. CEDE accounts for all the dose delivered during the entire time the radioactive material is in the body.

## Total Effective Dose Equivalent (TEDE)

Total effective dose equivalent is the sum of the deep dose equivalent (for dose from sources external to the body) and the committed effective dose equivalent (for internal dose). Since they are both doses to the body, they are not tracked separately. The NRC limits occupational dose to a radiation worker to five rem (5,000 mrem) TEDE per year.

## Sources of Radiation

### Background Radiation

Radiation did not begin with the nuclear power industry, and occurs naturally on earth. It is probably the most "natural" thing in nature. Mankind has always lived with radiation and probably always will. In fact, during every second of life, over 7,000 atoms undergo radioactive decay "naturally" in the body of the average adult. In addition, radioactive decay occurs naturally in soil, water, air and space. All these common sources of radiation contribute to the natural background radiation to which we are all exposed.

The earth is being showered by a steady stream of high-energy gamma rays and particulate radiation that come from space known as cosmic radiation. The atmosphere shields us from most of this radiation, but everyone still receives about 20 to 50 mrem each year from this source. The thinner air at higher altitudes provides less protection against cosmic radiation. People living at higher altitudes or flying in an airplane are exposed to even higher levels cosmic radiation. Radionuclides commonly found in the atmosphere as a result of cosmic ray interactions include Beryllium-7, Carbon-14, tritium (H-3), and Sodium-22.

Another common naturally occurring radionuclide is Potassium-40. About one-third of the external and internal dose from naturally occurring background radiation is attributed to this radioactive isotope of potassium.

The major source of background radiation is Radon, a colorless, odorless, radioactive gas that results from the decay of Radium-226, a member of the Uranium-238 decay series. Since Uranium occurs naturally in all soils and rocks, everyone is continuously exposed to Radon and its daughter products. Radon is not considered to pose a health hazard unless it is concentrated in a confined area, such as buildings, basements or underground mines. Radon-related health concerns stem from the exposure of the lungs to this radioactive gas. Radon emits alpha radiation when it decays, which can cause damage to internal tissues when inhaled. As a result, exposure to the lungs is a concern, since the only recognized health effect associated with exposure to Radon is an increased risk of lung cancer. This effect has been seen when Radon is present at levels common in uranium mines. According to the National Council on Radiation Protection and Measurement (NCRP), more than half of the radiation dose the average American receives is attributed to Radon.

### SOURCES OF EXPOSURE TO THE PUBLIC

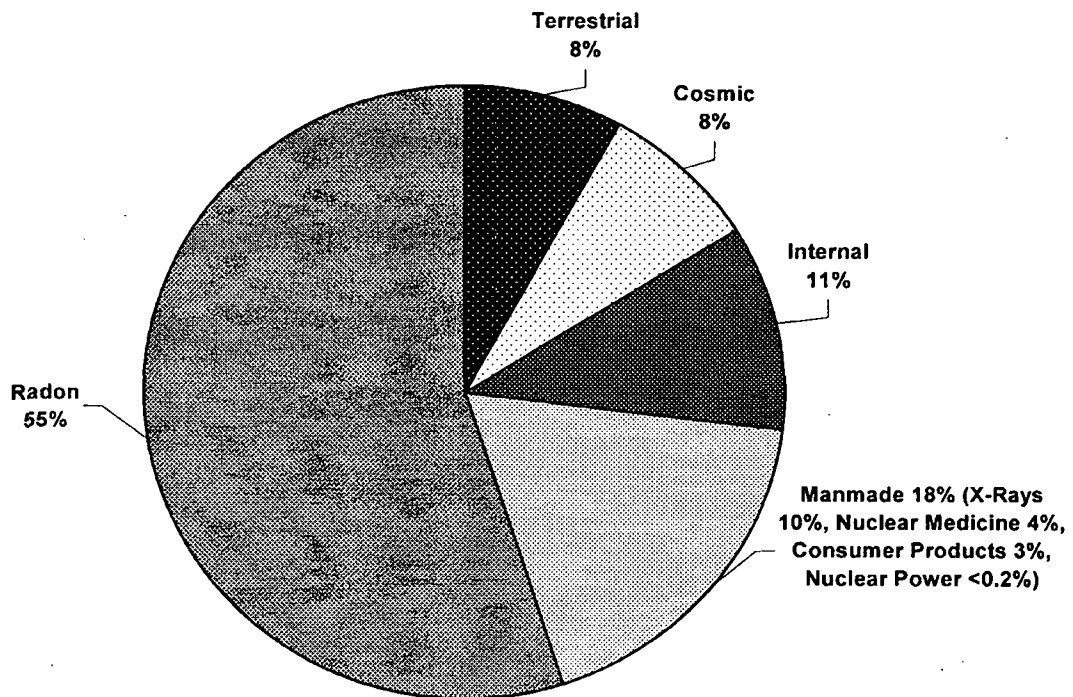


Figure 4: The most significant annual dose received by an individual of the public is that received from naturally occurring radon. A very small annual dose to the public results from producing electricity by nuclear power.

Further information on Radon, its measurement, and actions to reduce the Radon concentration in buildings can be obtained by contacting the state Radon program office at the following address:

Ohio Department of Health, Bureau of Radiation Protection  
246 North High Street  
Columbus, Ohio 43216-0118  
(614) 644-2727  
(614) 644-0381 FAX

The approximate average background radiation in this area (see Figure 4) is 300 mrem/year.

### Man-made Radiation

In addition to naturally occurring cosmic radiation and radiation from naturally occurring radioactivity, people are also exposed to man-made radiation. The largest sources of exposure include

medical x-rays and radioactive pharmaceuticals. Small doses are also received from consumer products such as televisions, smoke detectors, and fertilizers. Fallout from nuclear weapons tests is another source of man-made exposure. Fallout radionuclides include Strontium-90, Cesium-137, and tritium. Less than one percent of the annual dose a member of the public receives is a result of having electricity generated by nuclear power.

## Health Effects of Radiation

The effects of ionizing radiation on human health have been under study for more than ninety years. Scientists have obtained valuable knowledge through the study of laboratory animals that were exposed to radiation under extremely controlled conditions. However, it has been difficult to relate the biological effects of irradiated laboratory animals to the potential health effects on humans.

The effects of radiation on humans can be divided into two categories, somatic and genetic. Somatic effects are those which develop in the directly exposed individual, including an unborn child. Genetic effects are those which are observed in the offspring of the exposed individual.

Somatic effects can be divided further into acute and chronic effects. Acute effects develop shortly after exposure to large amount of radiation. Much study has been done with human populations that were exposed to ionizing radiation under various circumstances. These groups include the survivors of the atomic bomb, persons undergoing medical radiation treatment, and early radiologists, who accumulated large doses of radiation, unaware of the potential hazards.

Chronic effects are a result of exposure to radiation over an extended period of time. Examples of such groups are clock dial painters, who ingested large amounts of Radium by "tipping" the paint brushes with their lips, and Uranium miners, who inhaled large amounts of radioactive dust while mining pitchblende (Uranium ore). The studies performed on these groups have increased our knowledge of the health effects from comparatively very large doses of radiation received over long periods of time.

Continuous exposure to low levels of radiation may produce somatic changes over an extended period of time. For example, someone may develop cancer from man-made radiation, background radiation, or some other source not related to radiation. Because all illnesses caused by low level radiation can also be caused by other factors, it is virtually impossible to determine individual health effects of low level radiation. Even though no effects have been observed at doses less than 50 rem, we assume the health effects resulting from low doses of radiation occur proportionally to those observed following large doses of radiation. Most radiation scientists agree that this assumption over-estimates the risks associated with a low-level radiation exposure. The effects predicted in this manner have never been actually observed in any individuals exposed to low level radiation. Therefore, the most likely somatic effect of low level radiation is believed to be a small increased risk of cancer. Genetic effects could occur as a result of ionizing radiation interacting with the genes in the human cells. Radiation (as well as common chemicals) can cause physical changes or mutations in the genes. Chromosome fibers can break and rearrange, causing interference with the normal cell division of the chromosome by affecting their number and structure. A cell is able to rejoin the ends of a broken chromosome, but if there are two breaks close enough together in space and time, the broken ends from one break could

join incorrectly with those from another. This could cause translocations, inversions, rings, and other types of structural rearrangements. When this happens, new mutated genes are created. Radiation is not the only mechanism by which such changes can occur. Spontaneous mutations and chemically induced mutations also have been observed. These mutated genes may be passed from parent to offspring. Viable mutations due to low level, low dose radiation have not been observed in humans.

## Health Risks

While people may accept the risks inherent in their personal activities, such as smoking and driving to work each day, they are less inclined to accept the risk inherent in producing electricity. As with any industrial environment, it is not possible to guarantee a risk free environment. Thus, attention should be focused on taking steps to safeguard the public, on developing a realistic assessment of the risks, and on placing these risks in perspective. The perceptions of risk associated with exposure to radiation may have the greatest misunderstanding. Because people do not understand ionizing radiation and its associated risks, many fear it. This fear is compounded by the fact that we cannot hear, smell, taste or feel ionizing radiation.

We do not fear other potentially hazardous things for which we have the same lack of sensory perception, such as radio waves, carbon monoxide, and small concentrations of numerous cancer-causing substances. These risks are larger and measurable compared to those presumed to be associated with exposure to low level, low dose radiation. Most of these risks are with us throughout our lives, and can be added up over a lifetime to obtain a total effect. Table 1 shows a number of different factors that decrease the average life expectancy of individuals in the United States.

---

**Table 1: Risk Factors: Estimated Decrease in Average Life Expectancy**

---

Overweight by 30%:		3.6 years
Cigarette smoking:	1 pack/day	7.0 years
	2 packs/day	10.0 years
Heart Disease:		5.8 years
Cancer:		2.7 years
City Living (non-rural):		5.0 years
All operating commercial nuclear power plants totaled:		less than 12 minutes



## Benefits of Nuclear Power

Nuclear power plays an important part in meeting today's electricity needs, and will continue to serve as an important source of electric energy well into the future. Today more than twenty percent of the electricity produced in the United States is from nuclear powered electrical generating stations.

Nuclear power offers several advantages over alternative sources of electric energy:

- Nuclear power has an excellent safety record dating back to 1957, when the first commercial nuclear power station began operating,
- Uranium, the fuel for nuclear power stations, is a relatively inexpensive fuel that is readily available in the United States,
- Nuclear power is the cleanest energy source for power stations that use steam to produce electricity. There are no greenhouse gases or acid gases produced when using nuclear fuel.

The following sections provide information on the fundamentals of how Davis-Besse uses nuclear fuel and the fission process to produce electricity.

## Nuclear Power Production

Electricity is produced in a nuclear power station in the same way as in a fossil-fueled station with the exception of the source of heat. Heat changes water to steam that turns a turbine. In a fossil-fueled station, the fuel is burned in a furnace, which is also a boiler. Inside the boiler, water is turned into steam. In a nuclear station, a reactor that contains a core of nuclear fuel, primarily uranium, replaces the furnace. Heat is produced when the atoms of Uranium are split, or fissioned, inside the reactor.

### What is Fission?

A special force called the binding force holds the protons and neutrons together in the nucleus of the atom. The strength of this binding force varies from atom to atom. If the bond is weak enough, the nucleus can be split when bombarded by a free neutron (Figure 5). This causes the entire atom to split, producing smaller atoms, more free neutrons, and heat. In a nuclear reactor, a chain reaction of fission events provides the heat necessary to boil the water to produce steam.

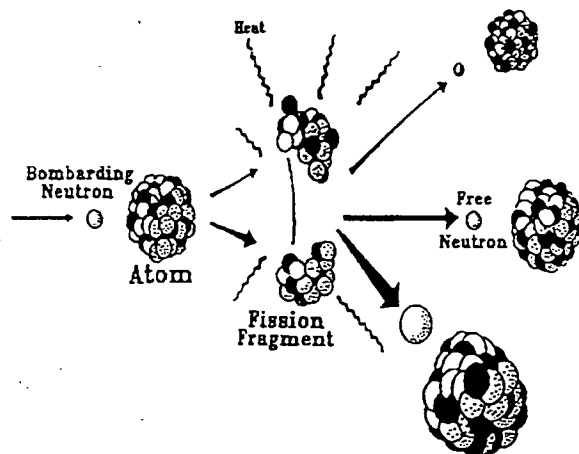


Figure 5: When a heavy atom, such as uranium-235 is split or fissioned, heat, free neutrons, and fission fragments result. The free neutrons can then strike neighboring atoms causing them to fission also. In the proper environment, this process can continue indefinitely in a chain reaction.

## Nuclear Fuel

The fissioning of one Uranium atom releases approximately 50 million times more energy than the combustion of a single Carbon atom common to all fossil fuels. Since a single small reactor fuel pellet contains trillions of atoms, each pellet can release an extremely large amount of energy. The amount of electricity that can be generated from three small fuel pellets would require about 3.5 tons of coal or 12 barrels of oil to generate.

Nuclear fission occurs spontaneously in nature, but these natural occurrences cannot sustain themselves because the freed neutrons either are absorbed by non-fissionable atoms or quickly **decay**. In contrast, a nuclear reactor minimizes neutron losses, thus sustaining the fission process by several means:

- using fuel that is free of impurities that might absorb the free neutrons,
- enriching the concentration of the rarer fissionable isotope of Uranium (U-235) relative to the concentration of U-238, a more common isotope that does not fission easily,
- slowing down neutron by providing a "moderator" such as water to increase the probability of fission.

Natural Uranium contains less than one percent U-235 compared to the more abundant U-238 when it's mined. Before it can be economically used in a reactor, it is enriched to three to five percent U-235, in contrast to nuclear material used in nuclear weapons which is enriched to over 97 percent. Because of the low levels of U-235 in nuclear fuel, a nuclear power station cannot explode like a bomb.

After the Uranium ore is separated from the earth and rock, it is concentrated in a milling process. After milling the ore to a granular form and dissolving out the Uranium with acid, the Uranium is converted to **Uranium hexafluoride (UF<sub>6</sub>)**. UF<sub>6</sub> is a chemical form of Uranium that exists as a gas at temperatures slightly above room temperature. The UF<sub>6</sub> is then highly purified and shipped to an enrichment facility where **gaseous diffusion converters** increase the concentration of U-235. The enriched gaseous UF<sub>6</sub> is then converted into powdered **Uranium dioxide (UO<sub>2</sub>)**, a highly stable ceramic material. The UO<sub>2</sub> powder is put under high pressure to form **fuel pellets**, each about 5/8 inch long and 3/8 inch in diameter. Approximately five pounds of these pellets are placed into a 12-foot long metal tube made of Zirconium alloy. The tubes constitute the **fuel cladding**. The fuel cladding is highly resistant to heat, radiation, and corrosion. When the tubes are filled with fuel pellets, they are called **fuel rods**.

## The Reactor Core

Two hundred eight fuel rods comprise a single **fuel assembly**. The **Reactor core** at Davis-Besse contains 177 of these fuel assemblies, each approximately 14 feet tall and 2,000 pounds in weight. In addition to the fuel rods, the fuel assembly also contains 16 vacant holes for the insertion of **control rods**, and one vacant hole for an **incore-monitoring probe**. This probe monitors temperature and neutron levels in the fuel assembly. The Davis-Besse reactor vessel, which contains all the fuel assemblies, weighs 838,000 pounds, has a diameter of 14 feet, is 39 feet high, and has steel walls that are 8 1/2 inches thick.

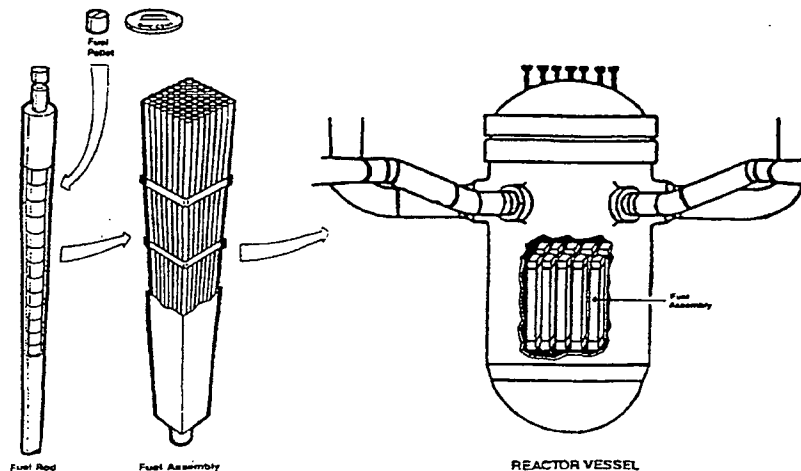


Figure 6: The reactor core at Davis-Besse contains 177 fuel assemblies. Each assembly contains 208 fuel rods. Each fuel rod is filled with approximately five pounds of fuel pellets, each pellet is approximately 3/8 inch diameter and 5/8 inch long.

## Fission Control

Raising or lowering control rod assemblies into the reactor core controls the fission rate. Each assembly consists of "fingers" containing Silver, Indium, and Cadmium metals that absorb free neutrons, thus disrupting the fission chain reaction. When control rod assemblies are slowly withdrawn from the core, fissioning begins and heat is produced. If the control rod assemblies are inserted rapidly into the reactor core, as during a plant "trip", the chain reaction ceases. A slower acting (but more evenly distributed) method of fission control is achieved by the addition of a **neutron poison** to the reactor coolant water. At Davis-Besse, high-purity boric acid is concentrated or diluted in the coolant to achieve the desired level of fission. Boron-10 readily absorbs free neutrons, forming Boron-11, removing the absorbed neutrons from the chain reaction.

## Reactor Types

Virtually all of the commercial reactors in this country are either **boiling water reactors (BWRs)** or **pressurized water reactors (PWRs)**. Both types are also called **light water reactors (LWRs)** because their coolant, or medium to transfer heat, is ordinary water, which contains the light isotope of Hydrogen. Some reactors use the heavy isotope of Hydrogen (deuterium) in the reactor coolant. Such reactors are called **heavy water reactors (HWRs)**.

In BWRs, water passes through the core and boils into steam. The steam passes through separators, which remove water droplets. The steam then travels to dryers before entering the turbine. After passing through the turbine the steam is condensed back into water and returns to the core to repeat the cycle.

In PWRs, the reactor water or coolant is pressurized to prevent it from boiling. The reactor water is then pumped to a **steam generator** (heat exchanger) where its heat is transferred to a secondary water supply. The secondary water inside the generator boils into steam, which is then used to turn the turbine. This steam is then condensed back into water and returned to the steam generator. Davis-Besse uses a PWR design.

The following paragraphs describe the various systems illustrated in Figure 7. Major systems in the Davis-Besse Station are assigned a different color in the figure.

# Davis-Besse Nuclear Power Station Unit No. 1

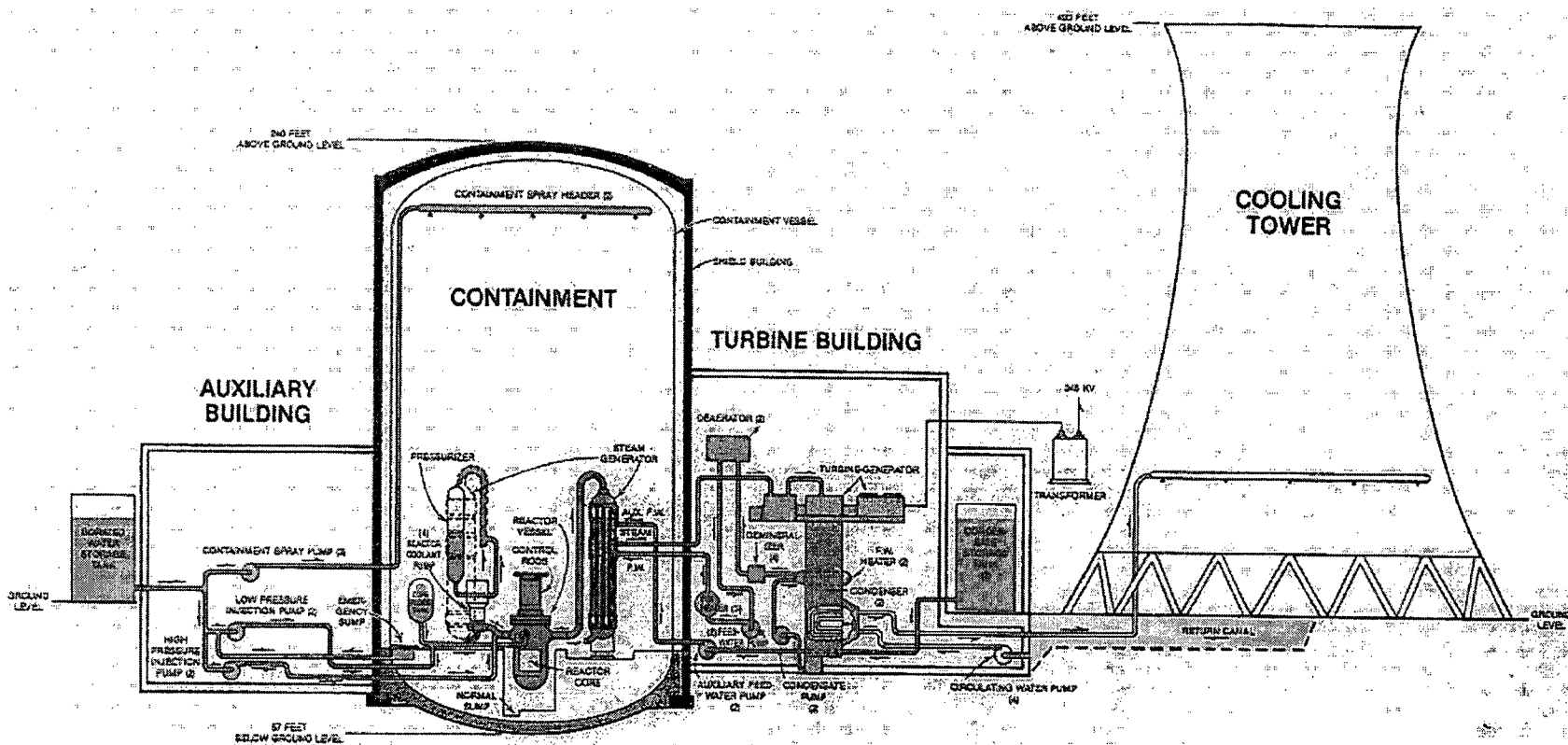


Figure 7: Station Systems

## Station Systems

### Containment Building and Fission Product Release Barriers

The **Containment building** houses the reactor vessel, the pressurizer, two steam generators, the Reactor Coolant Pumps and Reactor Coolant System piping. The building is constructed of an inner 1 -1/2 inch thick steel liner or **Containment vessel**, and the **Shield Building** with steel-reinforced concrete walls 2 feet thick. The shield building protects the containment vessel from a variety of environmental factors and provides an area for a **negative pressure boundary** around the steel Containment vessel. In the event that the integrity of the Containment vessel is compromised (e.g., a crack develops), this negative pressure boundary ensures that any airborne radioactive contamination present in the containment vessel is prevented from leaking out into the environment. This is accomplished by maintaining the pressure inside the Shield Building lower than that outdoors, thus forcing clean outside air to leak in, while making it impossible for the contaminated air between the Containment vessel and the Shield Building to leak out. The Containment vessel is the third in a **series of barriers** that prevent the release of fission products in the unlikely event of an accident. The first barrier to the release of fission products is the fuel cladding itself. The second barrier is the walls of the primary system, i.e. the reactor vessel, steam generator and associated piping.

### The Steam Generators

The **steam generators** perform the same function as a boiler at a fossil-fueled power station. The steam generator uses the heat of the primary coolant inside the steam generator tubes to boil the secondary side **feedwater** (secondary coolant). Fission heat from the reactor core is transferred to the steam generator in order to provide the steam necessary to drive the turbine. However, heat must also be removed from the core even after reactor shutdown in order to prevent damage to the fuel cladding. Therefore, pumps maintain a continuous flow of coolant through the reactor and steam generator. **Primary loop water** (green in Figure 7) exits the reactor at approximately 606°F, passes through the steam generator, transferring some of its heat energy to the **Secondary loop water** (blue in Figure 7) without actually coming in contact with it. Primary coolant water exits the steam generator at approximately 558°F to be circulated back into the reactor where it is again heated to 606°F as it passes up through the fuel assemblies. Under ordinary conditions, water inside the primary system would boil long before it reached such temperatures. However, it is kept under a pressure of approximately 2,200 pounds-per-square-inch (psi) at all times. This prevents the water from boiling and is the reason the reactor at Davis-Besse is called a Pressurized Water Reactor. Secondary loop water enters the base of the steam generator at approximately 450°F and under 1,100 psi pressure. At this pressure, the water can easily boil into steam as it passes over the tubes containing the primary coolant water.

Both the primary and the secondary coolant water are considered **closed loop systems**. This means that they are designed not to come in physical contact with one another. Rather, the cooling water in each loop transfers heat energy by **convection**. Convection is a method of **heat transfer** that can occur between two fluid media. It is the same process by which radiators are used to heat homes. The water circulating inside the radiator is separated from the air (a "fluid" medium) by the metal piping.

## The Turbine Generator

The turbine, main generator, and the condenser are all housed in what is commonly referred to as the **Turbine Building**. The purpose of the **turbine** is to convert the **thermal energy** of the steam produced in the steam generator (referred to as **main steam**, red in Figure 7) to **rotational energy** of the turbine generator shaft. The turbine at Davis-Besse is actually composed of one six-stage high-pressure turbine and two seven-stage low-pressure turbines aligned on a common shaft. A **turbine stage** refers to a set of blades. Steam enters at the center of each turbine and moves outward along the shaft in opposite directions through each successive stage of blading. As the steam passes over the turbine blades, it loses pressure. Thus, the blades must be proportionally larger in successive stages to extract enough energy from the steam to rotate the shaft at the correct speed.

The purpose of the **main generator** is to convert the rotational energy of the shaft to **electrical energy** for commercial usage and support of station systems. The main generator is composed of two parts, a stationary **stator** that contains coils of copper conductors, and a **rotor** that supplies a rotating magnetic field within the coils of the stator. Electrical current is generated in the stator portion of the main generator. From this point, the electric current passes through a series of **transformers** for transmission and use throughout northern Ohio.

## The Condenser

After the spent steam in the secondary loop (blue in Figure 7) passes through the High and Low Pressure Turbines, it is collected in the **condenser**, which is several stories tall and contains more than 70,000 small tubes. **Circulating Water** (yellow in Figure 7) goes to the **Cooling Tower** after passing through the tubes inside the Condenser. As the steam from the Low Pressure Turbines passes over these tubes, it is cooled and condensed. The condensed water is then purified and reheated before being circulated back into the steam generator again in a closed loop system. Circulating water forms the third (or **tertiary**) and final loop of cooling water used at the Davis-Besse Station.

Similar to the primary to secondary interface, the secondary-to-tertiary interface is based on a closed-loop design. The Circulating Water, which is pumped through the tubes in the Water Box, is able to cool the water in the Condenser by the processes of conduction and convection. Even in the event of a primary-to-secondary leak, the water vapor exiting the Davis-Besse Cooling Tower would remain non-radioactive. Closed loops are an integral part of the design of any nuclear facility. This feature greatly reduces the chance of environmental impact from Station operation.

## The Cooling Tower

The Cooling Tower at Davis-Besse is easily the most noticeable feature of the plant. The tower stands 493 feet high and the diameter of the base is 411 feet. Two nine-foot diameter pipes circulate 480,000 gallons of water per minute to the tower. Its purpose is to recycle water from the Condenser by cooling and returning it.

After passing through the Condenser, the Circulating Water has warmed to approximately 100°F. In order to cool the water back down to 70°F, the Circulating Water enters the Cooling Tower forty feet above the ground. It is then sprayed evenly over a series of baffles called fill sheets, which are suspended vertically in the base of the tower. A natural draft of air is swept upward through these baffles and cools the water by evaporation. The evaporated water exits the top of the Cooling Tower as water vapor.

As much as 10,000 gallons of water per minute are lost to the atmosphere via the **Cooling Tower**. Even so, approximately 98 percent of the water drawn from Lake Erie for station operation can be recycled through the Cooling Tower for reuse. A small portion of the Circulating Water is discharged back to Lake Erie at essentially the same temperature it was withdrawn earlier. The slightly warmer water has no adverse environmental impact on the area of lake surrounding the discharge point.

### Miscellaneous Station Safety Systems

The orange system in Figure 7 is part of the **Emergency Core Cooling System (ECCS)** housed in the **Auxiliary Building** of the station. The ECCS consists of three overlapping means of keeping the reactor core covered with water, in the unlikely event of a Loss-of-Coolant Accident (LOCA), thereby protecting the fuel cladding barrier against high-temperature failure. Depending on the severity of the loss of pressure inside the Primary System, the ECCS will automatically channel borated water into the Reactor by using **High Pressure Injection Pumps**, a **Core Flood Tank**, or **Low Pressure Injection Pumps**. Borated water can also be sprayed from the ceiling of the Containment Vessel to cool and condense any steam that escapes the Primary System.

The violet system illustrated in Figure 7 is responsible for maintaining the Primary Coolant water in a liquid state. It accomplishes this by adjusting the pressure inside the Primary System. Heaters inside the **Pressurizer** turn water into steam. This steam takes up more space inside the Pressurizer, thereby increasing the overall pressure inside the Primary System. The Pressurizer is equipped with spray heads that shower cool water over the steam in the unit. In this case, the steam condenses and the overall pressure inside the Primary System drops. The **Quench Tank** pictured in Figure 8 is simply where excess steam is directed and condensed for storage.

The scarlet system in Figure 7 is part of the **Auxiliary Feedwater System**, a key safety system in event the main feedwater supply (blue in Figure 7) to the Steam Generator is lost. Following a reactor shutdown, the Auxiliary Feedwater System can supply water to the Steam Generators from the **Condensate Storage Tanks**. The Auxiliary Feedwater System is housed in the Turbine Building along with the Turbine, Main Generator, and the Condenser.



## Reactor Safety and Summary

Nuclear power plants are inherently safe, not only by the laws of physics, but by design. Nuclear power plants cannot explode like a bomb, because the concentration of fissionable material is far less than is necessary for such a nuclear explosion. Also, many safety features are equipped with several backup systems to ensure that any possible accident would be prevented from causing a serious health or safety threat to the public, or serious impact on the local environment. Davis-Besse, like all U.S. nuclear units, has many overlapping, or redundant safety features. If one system should fail, there are still back-up systems to assure the safe operation of the Station. During normal operation, the **Reactor Control System** regulates the power output by adjusting the position of the control rods. The Reactor can be automatically shut down by a separate **Reactor Protection System**, which causes all the control rod assemblies to be quickly and completely inserted into the Reactor core, stopping the chain reaction. To guard against the possibility of a Loss of Coolant Accident, the Emergency Core Cooling System is designed to pump reserve water into the reactor automatically if the reactor coolant pressure drops below a predetermined level.

The Davis-Besse Nuclear Power Station was designed, constructed, and operates to produce a reliable, safe, and environmentally sound source of electricity.

## Radioactive Waste

Many of the activities we depend on in our everyday lives produce radioactive waste by-products. Nuclear energy, industrial processes, and medical treatments are some of these activities. These by-products are managed and disposed of under strict requirements set by the federal government. With the exception of used nuclear fuel assemblies, these by-products produced at commercial power plants are referred to as low level radioactive waste.

### Low Level Radioactive Waste

Low level radioactive waste consists mainly of ordinary trash and other items that have become contaminated with radioactive materials. It includes plastic gloves and other protective clothing, machine parts and tools, medical and laboratory equipment, filters, resins, and general scrap.

The radioactive material in low level radioactive waste emits the same types of radiation that naturally occurring radioactive materials tend to emit. Most low level activity in radioactive waste decay to background levels within months or years. Nearly all activity diminishes to stable materials in less than 300 years.

Davis-Besse currently ships low-level radioactive waste to facilities in Tennessee for waste minimization processing prior to disposal. Davis-Besse has the capacity to store low-level waste produced on site for several years in the Low Level Radioactive Waste Storage Facility (LLRWSF), should these facilities close.

## High Level Nuclear Waste

Like any industrial or scientific process, nuclear energy does produce waste. The most radioactive is defined as "high-level" waste (because it has high levels of radioactivity). Ninety-nine percent of high-level waste from nuclear plants is used nuclear fuel. The fuel undergoes certain changes during fission. Most of the fragments of fission, pieces that are left over after the atom is split, are radioactive. After a period of time, the fission fragments trapped in the fuel assemblies reduce the efficiency of the chain reaction. The oldest fuel assemblies are removed from the reactor and replaced with fresh fuel at 24 month intervals.

High-level nuclear waste volumes are small. Davis-Besse produces about 30 tons of used fuel every 24 months. All the used fuel produced by all America's nuclear energy plants since the first plant started operating over 30 years ago would cover an area the size of a football field about five yards deep. All of America's nuclear plants combined produce only 3,000 tons of used fuel each year. By contrast, the U.S. produces about 300,000,000 tons of chemical waste annually. Also, nuclear waste slowly loses its radioactivity, but some chemical waste remains hazardous indefinitely.

Davis-Besse presently stores most of its used fuel in a steel-lined water-filled concrete vault inside the plant. The Department of Energy is charged with constructing a permanent high-level waste repository for all of the nation's nuclear plants. By law, the Department of Energy was required to accept fuel from utilities by the end of 1998. Until the permanent DOE site is developed, nuclear plants will be responsible for the continued safe storage of high-level waste. At Davis-Besse, the fuel pool reached its capacity in 1996. At the end of 1996, Davis-Besse began the process of moving the older fuel assemblies that no longer require water cooling to air-cooled concrete shielded canisters. These will remain onsite until the Department of Energy facilities are ready to receive them. Dry fuel storage is already used in many countries, including Canada, and in the U.S. at nuclear plants in Arkansas, Colorado, Maryland, Michigan, Minnesota, Virginia, Wisconsin and South Carolina. Figure 8 illustrates the Dry Fuel Storage module arrangement at Davis-Besse.

In 2001, work was performed to increase the storage capacity of the Spent Fuel Pool. The pool remains the same size, however, removing old storage racks and replacing them with new ones changed the configuration of storage, and allows the site to safely hold all the fuel used during its 40 years of expected life. This modification was completed in April of 2002.

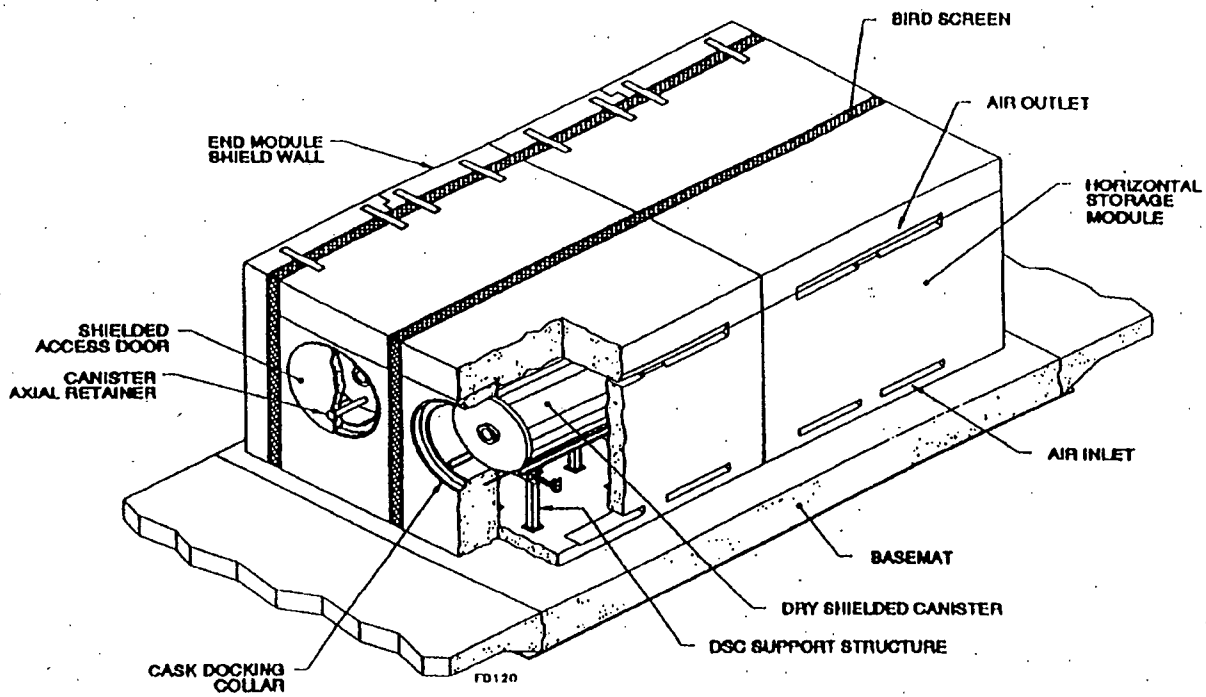


Figure 8: Dry Fuel Storage Module Arrangement

## Description of the Davis-Besse Site

The Davis-Besse site is located in Carroll Township of Ottawa County, Ohio. It is on the southwestern shore of Lake Erie, just north of the Toussaint River. The site lies north and east of Ohio State Route 2, approximately 10 miles northwest of Port Clinton, 7 miles north of Oak Harbor, and 25 miles east of Toledo, Ohio (Figure 9).

This section of Ohio is flat and marshy, with maximum elevations of only a few feet above the level of Lake Erie. The area originally consisted of swamp forest and marshland, rich in wildlife but unsuitable for settlement and farming. During the nineteenth century, the land was cleared and drained, and has been farmed successfully since. Today, the terrain consists of farmland with marshes extending in some places for up to two miles inland from the Sandusky Lake Shore Ridge.

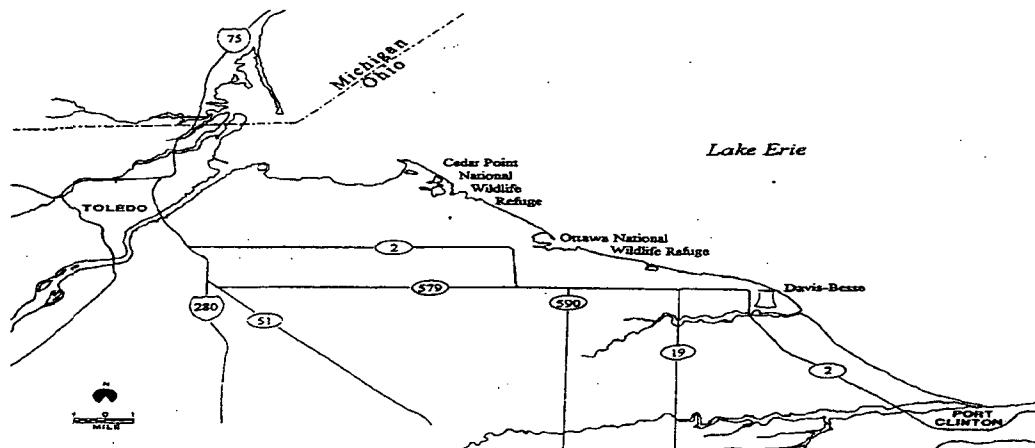


Figure 9: Davis-Besse is near Oak Harbor, Port Clinton, and the Ottawa National Wildlife Refuge.

The Davis-Besse site is mainly comprised of marshland, with a small portion consisting of farmland. The marshes are part of a valuable ecological resource, providing a breeding ground for a variety of wildlife, and a refuge for migratory birds. The site includes a tract known as Navarre Marsh, which was acquired from the U.S. Bureau of Sport Fisheries and Wildlife, Department of the Interior. In 1971, Toledo Edison purchased the 188-acre Toussaint River Marsh. The Toussaint River Marsh is contiguous with the 610-acre Navarre Marsh section of the Ottawa National Wildlife Refuge.

The immediate area near Davis-Besse is sparsely populated. The year 2000 Census listed the population of Ottawa County at 40,985. The incorporated communities nearest to Davis-Besse are:

- Port Clinton - 10 miles southeast, population 6,391
- Oak Harbor - 7 miles south, population 2,841
- Rocky Ridge - 7 miles west southwest, population 389
- Toledo (nearest major city) - 25 miles west, population 313,619

There are some residences along the lakeshore used mainly as summer homes. However, the major resort area of the county is farther east, around Port Clinton, Lakeside, and the Bass Islands.

The majority of non-marsh areas around the Davis-Besse site are used for farming. The major crops include soybeans, corn, wheat, oats, hay, fruits and vegetables. Meat and dairy animals are not major sources of income in the area. The main industries within five miles of the site are located in Erie Industrial Park, about four miles southeast of the station.

Most of the remaining marshes in the area have been maintained by private hunting clubs, the U.S. Fish and Wildlife Service, and the Ohio Department of Natural Resources, Division of Wildlife. The State of Ohio Department of Natural Resources operates many wildlife and recreational areas within 10 miles of the Station. These include Magee Marsh, Turtle Creek, Crane Creek State Park, and the Ottawa National Wildlife Refuge. Magee Marsh and Turtle Creek lie between three and six miles WNW of the Station. Magee Marsh is a wildlife preserve that allows public fishing, nature study, and a controlled hunting season. Turtle Creek, a wooded area at the southern end of Magee Marsh, offers boating and fishing. Crane Creek State Park is adjacent to Magee Marsh, and is a popular birding and hunting area. The Ottawa National Wildlife Refuge lies four to nine miles WNW of the Site, immediately west of Magee Marsh.

## References

1. "Basic Radiation Protection Criteria," Report No. 39, National Council on Radiation Protection and Measurement, Washington, D.C. (January 1971).
2. "Cesium-137 from the Environment to Man: Metabolism and Dose," Report No. 52, National Council on Radiation Protection and Measurements, Washington, D.C. (January 1977).
3. Deutch, R., "Nuclear Power, A Rational Approach," Fourth edition, GP Courseware, Inc., Columbia, MD. (1987).
4. Eisenbud, M., "Environmental Radioactivity," Academic Press, Inc., Orlando, FL. (1987).
5. "Environmental Radiation Measurements," Report No. 50, National Council on Radiation Protection and Measurements, Washington, D.C. (December 1976).
6. "Exposure of the Population in the United States and Canada from Natural Background Radiation," Report No. 94, National Council on Radiation Protection and Measurements, Washington, D.C. (December 1987).
7. "Health Effects of Exposure to Low Levels of Ionizing Radiation: BEIR V," Committee on the Biological Effects of Ionizing Radiations, Board on Radiation Effects Research Commission on Life Sciences, National Research Council, National Academy Press, Washington, D.C. (1990).
8. Hendee, William R., and Doege, Theodore C., "Origin and Health Risks of Indoor Radon," Seminars in Nuclear Medicine, Vol. XVIII, No. 1, American Medical Association, Chicago, IL. (January 1987).
9. Hurley, P., "Living with Nuclear Radiation," University of Michigan Press, Ann Arbor, MI. (1982).
10. "Indoor Air Quality Environmental Information Handbook: Radon," prepared for the United States Department of Energy, Assistant Secretary for Environment, Safety and Health, by Mueller Associated, Inc., Baltimore, MD. (January 1986).
11. Introduction to Davis-Besse Nuclear Power Station Plant Technology, July 1992, Rev. 4, Pg.2-9.
12. "Ionizing Radiation Exposure of the Population of the United States," Report No. 93, National Council on Radiation Protection and Measurements, Washington, D.C. (September 1987).
13. "Natural Background Radiation in the United States," Report No. 45, National Council on Radiation Protection and Measurements, Washington, D.C. (November 1975).

14. "Nuclear Energy Emerges from 1980's Poised for New Growth," U.S. Council for Energy Awareness, Washington, D.C. (1989).
15. "Nuclear Power: Answers to Your Questions," Edison Electric Institute, Washington, D.C. (1987).
16. "Public Radiation Exposure from Nuclear Power Generation in the United States," Report No. 92, National Council on Radiation Protection and Measurement, Washington, D.C. (December 1987).
17. "Radiation Protection Standards," Department of Environmental Sciences and Physiology and the Office of Continuing Education, Harvard School Of Public Health, Boston, MA. (July 1989).
18. Radiological Environmental Monitoring Report for Three Mile Island Station," GPU Nuclear Corporation, Middletown, PA. (1985).
19. "Sources, Effects and Risk of Ionizing Radiation," United Nations Scientific Committee on the Effects of Atomic Radiation, 1988 Report to the General Assembly, United Nations, New York (1988).
20. "Standards for Protection Against Radiation," Title 10, Part 20, Code of Federal Regulation, Washington, D.C. (1988).
21. "Domestic Licensing of Production and Utilization Facilities," Title 10, Part 50, Code of Federal Regulations, Washington, D.C. (1988).
22. "Environmental Radiation Protection Standard for Nuclear Power Operations," Title 40, Part 190, Code of Federal Regulations, Washington, D.C. (1988).
23. "Tritium in the Environment," Report No. 62, National Council on Radiation Protection and Measurement, Washington, D.C. (March 1979).
24. Site Environmental Report, Fernald Environmental Management Project, United States Department of Energy (June 1993).
25. "Exposure from the Uranium Series with Emphasis on Radon and its Daughters" Report No. 77, National Council on Radiation Protection and Measurements, Washington, D.C. (1984).
26. "Evaluation of Occupational and Environmental Exposures to Radon and Radon daughter in the United States," Report No. 78, National Council on Radiation Protection and Measurements, Washington, D.C. (1984).

# Radiological Environmental Monitoring Program

---

## Introduction

The **Radiological Environmental Monitoring Program (REMP)** was established at Davis-Besse for several reasons: to provide a supplementary check on the adequacy of containment and effluent controls, to assess the radiological impact of the Station's operation on the surrounding area, and to determine compliance with applicable radiation protection guides and standards. The REMP was established in 1972, five years before the Station became operational. This **pre-operational surveillance program** was established to describe and quantify the radioactivity, and its variability, in the area prior to the operation of Davis-Besse. After Davis-Besse became operational in 1977, the **operational surveillance program** continued to measure radiation and radioactivity in the surrounding areas.

A variety of environmental samples are collected as part of the REMP at Davis-Besse. The selection of sample types is based on the established critical pathways for the transfer of radionuclides through the environment to humans. The selection of sampling locations is based on sample availability, local meteorological and hydrological characteristics, local population characteristics, and land usage in the area of interest. The selection of sampling frequencies for the various environmental media is based on the radionuclides of interest, their respective half-lives, and their effect in both biological and physical environments.

A description of the REMP at Davis-Besse is provided in the following section. In addition, a brief history of analytical results for each sample type collected since 1972, and a more detailed summary of the analyses performed during this reporting period, is also provided.

## Pre-operational Surveillance Program

The federal government requires nuclear facilities to conduct radiological environmental monitoring prior to constructing the facility. This pre-operational surveillance program is for the collection of data needed to identify critical pathways, including selection of radioisotope and sample media combinations for the surveillance conducted after facility operations begin. Radiochemical analyses performed on samples should include nuclides that are expected to be released during normal facility operations, as well as typical fallout radionuclides and natural background radioactivity. All environmental media with a potential to be affected by facility operation, as well as those media directly in the critical pathways, should be sampled during the pre-operational phase of the environmental surveillance program.

The pre-operational surveillance design, including nuclide/media combinations, sampling frequencies and locations, collection techniques, and radiochemical analyses performed, should be carefully considered and incorporated in the design of the operational surveillance program. In



this manner, data can be compared in a variety of ways (for example: from year to year, location to location, etc.) in order to detect any radiological impact the facility has on the surrounding environment. Data collection during the pre-operational phase should be planned to provide a comprehensive database for evaluating any future changes in the environment surrounding the plant.

Davis-Besse began its pre-operational environmental surveillance program five years before the Station began producing power for commercial use in 1977. Data accumulated during that time provides an extensive database from which Station personnel are able to identify trends in the radiological characteristics of the local environment. The environmental surveillance program at Davis-Besse will continue after the Station has reached the end of its economically useful life and decommissioning has begun.

## Operational Surveillance Program Objectives

The operational phase of the environmental surveillance program at Davis-Besse was designed with the following objectives in mind:

- to fulfill the obligations of the radiological surveillance sections of the Station's Technical Specifications and Offsite Dose Calculation Manual
- to determine whether any significant increase in the concentration of radionuclides in critical pathways occurs
- to identify and evaluate the buildup, if any, of radionuclides in the local environment, or any changes in normal background radiation levels
- to verify the adequacy of Station controls for the release of radioactive materials

## Quality Assurance

An important part of the environmental monitoring program at Davis-Besse is the **Quality Assurance (QA) Program**, which is conducted in accordance with the guidelines specified in NRC Regulatory Guide 4.15, "Quality Assurance for Radiological Monitoring Programs". The QA Program is designed to identify possible deficiencies in the REMP so that corrective actions can be initiated promptly. Davis-Besse's Quality Assurance program also provides confidence in the results of the REMP through:

- performing regular audits (investigations) of the REMP, including a careful examination of sample collection techniques and record keeping
- performing audits of contractor laboratories which analyze the environmental samples
- requiring analytical contractor laboratories to participate in the United States Environmental Protection Agency Cross Check Program
- requiring analytical contractor laboratories to split samples for separate analysis followed by a comparison of results
- splitting samples prior to analysis by independent laboratories, and then comparing the results for agreement

- requiring analytical contractor laboratories to perform in-house spiked sample analyses

Quality Assessment audits and inspections of the Davis-Besse REMP are performed by the FirstEnergy Nuclear Operating Company QA Department and the NRC. In addition, the Ohio Department of Health (ODH) also performs independent environmental monitoring in the vicinity of Davis-Besse. The types of samples collected and list of sampling locations used by the ODH were incorporated in Davis-Besse's REMP, and the analytical results from their program can be compared to Davis-Besse's. This practice of comparing results from identical samples, which are collected and analyzed by different parties, provides a valuable tool to verify the quality of the laboratories' analytical procedures and data generated.

In 1987, environmental sampling personnel at Davis-Besse incorporated their own QA program into the REMP. Duplicate samples, called quality control samples, were collected at several locations. These duplicate samples were assigned different identification numbers than the numbers assigned to the routine samples. This ensured that the analytical laboratory would not know the samples were identical. The laboratory results from analysis of the quality control samples and the routine samples could then be compared for agreement. Quality control sampling has been integrated into the program and has become an important part of the REMP since 1987. Quality control sampling locations are changed frequently in order to duplicate as many sampling locations as possible, and to ensure the contractor laboratory has no way of correctly pairing a quality control sample with its routine sample counterpart.

## Program Description

The Radiological Environmental Monitoring Program (REMP) at Davis-Besse is conducted in accordance with Title 10, Code of Federal Regulations, Part 50; Regulatory Guide 4.8; the Davis-Besse Nuclear Power Station Operating License, Sections 5.6.1 and 5.6.2 of Davis-Besse Improved Standard Technical Specifications, the Davis-Besse Offsite Dose Calculation Manual (ODCM) and Station Operating Procedures. Samples are collected weekly, monthly, quarterly, semiannually, or annually, depending upon the sample type and nature of the radionuclides of interest. Environmental samples collected by Davis-Besse personnel are divided into four general types:

- **atmospheric** -- including samples of airborne particulate and airborne radio-iodine
- **terrestrial** -- including samples of milk, groundwater, broad leaf vegetation, fruits, animal/wildlife feed, soil, and wild and domestic meat
- **aquatic** -- including samples of treated and untreated surface water, fish, and shoreline sediments
- **direct radiation** -- measured by thermoluminescent dosimeters

All environmental samples are labeled using a sampling code. Table 2 provides the sample codes and collection frequency for each sample type.

REMP samples are collected onsite and offsite up to 25 miles away from the Station. Sampling locations may be divided into two general categories: indicator and control. Indicator locations are those which would be most likely to display the effects caused by the operation of Davis-

Besse, and are located within five miles of the station. Control locations are those which should be unaffected by Station operations, and are more than five miles from the Station. Data from indicator locations are compared with data from the control locations. This comparison allows REMP personnel to take into account naturally-occurring background radiation or fallout from weapons testing in evaluating any radiological impact Davis-Besse has on the surrounding environment. Data from indicator and control locations are also compared with pre-operational data to determine whether significant variations or trends exist.

Since 1987 the REMP has been reviewed and modified to develop a comprehensive sampling program adjusted to the current needs of the utility. Modifications have included additions of sampling locations above the minimum amount required in the ODCM and increasing the number of analyses performed on each sample. Besides adding new locations, duplicate or Quality Control (QC) sample collection was initiated to verify the accuracy of the lab analyzing the environmental samples. These additional samples are referred to as the REMP Enhancement Samples. Approximately 2,000 samples were collected and over 2,300 analyses were performed during 2009. In addition, 15% of the sampling locations were quality control sampling locations. Table 3 shows the number of the sampling location and number collected for each type.

Table 2: Sample Codes and Collection Frequencies

<b>Sample Type</b>	<b>Sample Code</b>	<b>Collection Frequency</b>
Airborne Particulate	AP	Weekly
Airborne Iodine	AI	Weekly
Thermoluminescent Dosimeter	TLD	Quarterly, Annually
Milk	MIL	Monthly (semi-monthly during grazing season)
Groundwater	WW	Quarterly (when available)
Broadleaf Vegetation	BLV	Monthly (when available)
Surface Water - Treated	SWT	Weekly
Surface Water - Untreated	SWU	Weekly
Fish	FIS	Annually
Shoreline Sediment	SED	Semiannually
Soil	SOI	Annually
Wildlife Feed	WFE	Annually
Meat-Wild	WME	Annually
Fruit	FRU	Annually

Table 3: Sample Collection Summary

Sample Type (Remarks)	Collection Type*/ Frequency**	Number of Locations	Number of Samples Collected	Number of Samples Missed
Atmospheric				
Airborne Particulates	C/W	10	520	0
Airborne Radioiodine	C/W	10	520	0
Terrestrial				
Milk (Jan.-Dec.)	G/M	1	12	0
Groundwater	G/Q**	3	3	0
Wild Meat	G/A	2	2	0
Broadleaf				
Vegetation	G/M	3	9	0
Fruit	G/A	3	3	0
Soil	G/A	10	10	0
Animal/Wildlife Feed	G/A	3	3	0
Aquatic				
Treated	Comp/WM	4	208	0
Surface Water	G/WM***	1	52	0
Untreated	G/WM***	3	156	0
Surface Water	Comp/WM	3	156	0
Fish (2 species)	G/A	2	6	0
Shoreline Sediments	G/SA	5	10	0
Direct Radiation				
Thermoluminescent	C/Q***	88	351	0
Dosimeters (TLD)	C/A***	88	88	0

\* Type of Collection: C = Continuous; G = Grab; Comp = Composite

\*\* Frequency of Collection: WM = Weekly composite Monthly; W = Weekly; M = Monthly; Q = Quarterly when available; SA = Semiannually; A = Annually

\*\*\* Includes quality control location. SWU and SWT QC included in weekly grab sample/composited monthly

## Sample Analysis

When environmental samples are analyzed, several types of measurements may be performed to provide information about the radionuclides present. The major analyses that are performed on environmental samples collected for the Davis-Besse REMP include:

**Gross beta analysis** measures the total amount of beta emitting radioactive material present in a sample. Beta radiation may be released by many different radionuclides. Since beta decay gives a continuous energy spectrum rather than the discrete lines or "peaks" associated with gamma radiation, identification of specific beta emitting nuclides is much more difficult. Therefore, gross beta analysis only indicates whether the sample contains normal or abnormal concentrations of beta emitting radionuclides; it does not identify specific radionuclides. Gross beta analysis merely acts as a tool to identify samples that may require further analysis.

**Gamma spectral analysis** provides more specific information than does gross beta analysis. Gamma spectral analysis identifies each gamma emitting radionuclide present in the sample, and the amount of each nuclide present. Each radionuclide has a very specific "fingerprint" that allows for swift and accurate identification. For example, gamma spectral analysis can be used to identify the presence and amount of Iodine-131 in a sample. Iodine-131 is a man-made radioactive isotope of Iodine that may be present in the environment as a result of fallout from nuclear weapons testing, routine medical uses in diagnostic tests, and routine releases from nuclear power stations.

**Tritium analysis** indicates whether a sample contains the radionuclide tritium (H-3) and the amount present. As discussed in the Introduction section, tritium is an isotope of Hydrogen that emits low energy beta particles.

**Strontium analysis** identifies the presence and amount of Strontium-89 and Strontium-90 in a sample. These man-made radionuclides are found in the environment as a result of fallout from nuclear weapons testing. Strontium is usually incorporated into the pool of the biosphere. In other words, it accumulates in living organisms, where it is stored in the bone tissue. The principal Strontium exposure pathway is via milk produced by cattle grazed on pastures exposed to deposition from airborne releases.

**Gamma Doses** measured by thermoluminescent dosimeters while in the field are determined by a special laboratory procedure. Table 4 provides a list of the analyses performed on environmental samples collected for the Davis-Besse REMP.

Often samples will contain little radioactivity, and may be below the lower limit of detection for the particular type of analysis used. The lower limit of detection (LLD) is the smallest amount of sample activity that can be detected with a reasonable degree of confidence at a predetermined level. When a measurement of radioactivity is reported as less than LLD (<LLD), it means that the radioactivity is so low that it cannot be accurately measured with any degree of confidence by a particular method for an individual analysis.

Table 4: Radiochemical Analyses Performed on REMP Samples

Sample Type	Analyses Performed
Atmospheric Monitoring	
Airborne Particulate	Gross Beta Gamma Spectroscopy Strontium-89 Strontium-90
Airborne Radioiodine	Iodine-131
Terrestrial Monitoring	
Milk	Gamma Spectroscopy Iodine-131 Strontium-89 Strontium-90 Stable Calcium Stable Potassium
Groundwater	Gross Beta Gamma Spectroscopy Tritium Strontium-89 Strontium-90
Broadleaf Vegetation and Fruits	Gamma Spectroscopy Iodine-131 Strontium-89 Strontium-90
Wildlife Feed	Gamma Spectroscopy
Soil	Gamma Spectroscopy
Wild Animal Meat	Gamma Spectroscopy

---

**Table 4: Radiochemical Analyses Performed on REMP Samples  
(continued)**

---

<b>Sample Type</b>	<b>Analyses Performed</b>
<b>Aquatic monitoring</b>	
Untreated Surface Water	Gross Beta Gamma Spectroscopy Tritium Strontium-89 Strontium-90
Treated Surface Water	Gross Beta Gamma Spectroscopy Tritium Strontium-89 Strontium-90 Iodine-131
Fish	Gross Beta Gamma Spectroscopy
Shoreline Sediment	Gamma Spectroscopy
<b>Direct Radiation Monitoring</b>	
Thermoluminescent Dosimeters	Gamma Dose

## Sample History Comparison

The measurement of radioactive materials present in the environment will depend on factors such as weather or variations in sample collection techniques or sample analysis. This is one reason why the results of sample analyses are compared with results from other locations and from earlier years. Generally, the results of sample analyses are compared with pre-operational and operational data. Additionally, the results of indicator and control locations are also compared. This allows REMP personnel to track and trend the radionuclides present in the environment, to assess whether a buildup of radionuclides is occurring and to determine the effects, if any, the operation of Davis-Besse is having on the environment. If any unusual activity is detected, it is investigated to determine whether it is attributable to the operation of Davis-Besse, or to some other source such as nuclear weapons testing.



## Atmospheric Monitoring

- **Airborne Particulates:** No radioactive particulates have been detected as a result of Davis-Besse's operation. Only natural and fallout radioactivity from nuclear weapons testing and the 1986 nuclear accident at Chernobyl have been detected.
- **Airborne Radioiodine:** Radioactive Iodine-131 fallout was detected in 1976, 1977, and 1978 from nuclear weapons testing, and in 1986 (0.12 to 1.2 picocuries per cubic meter) from the nuclear accident at Chernobyl.

## Terrestrial Monitoring:

- **Groundwater:** Tritium was not detected above the lower limit of detection during 2009 in any REMP samples.
- **Milk:** Iodine-131 from nuclear weapons testing fallout was detected in 1976 and 1977 at concentrations of 1.36 and 23.9 picocuries/liter respectively. In 1986, concentrations of 8.5 picocuries/liter were detected from the nuclear accident at Chernobyl. No Iodine-131 detected has been attributable to the operation of Davis-Besse.
- **Wild Meat:** Only naturally-occurring Potassium-40 and very low Cesium-137 from fallout activity has been detected in meat samples. Potassium-40 has ranged from 1.1 to 4.6 picocuries/gram weight (wet). Cesium-137 was detected in 1974, 1975, and 1981 due to fallout from nuclear weapons testing.
- **Broadleaf Vegetation and Fruits:** Only naturally-occurring radioactive material and material from nuclear weapons testing have been detected.
- **Soil:** Only natural background and material from nuclear weapons testing and the 1986 nuclear accident at Chernobyl have been detected.
- **Animal/Wildlife Feed:** Only natural background and material from weapons testing have been detected.

## Aquatic Monitoring

- **Surface Water (Treated and Untreated):** Historically, tritium has been detected sporadically at low levels in treated and untreated surface water at both Control and Indicator locations. During 2009 there were two samples of Untreated Water that showed detectable tritium.
- **Fish:** Only natural background radioactive material and material from nuclear testing have been detected.
- **Shoreline Sediments:** Only natural background radiation, material from nuclear testing and the 1986 nuclear accident at Chernobyl have been detected.

## Direct Radiation Monitoring

- **Thermoluminescent Dosimeters (TLDs):** The annual gamma dose rates for the current reporting period recorded by TLDs averaged 62.0 millirem/year at Control locations, and 57.9 millirem/year at Indicator locations. No increase above natural background radiation attributable to the operation of Davis-Besse has been observed.

## 2009 Program Anomalies

All ODCM-required samples were collected during 2009. There were no sample collection irregularities or abnormal releases during 2009.

## Atmospheric Monitoring

### Air Samples

Environmental air sampling is conducted to detect any increase in the concentration of airborne radionuclides that may be inhaled by humans or serve as an external radiation source. Inhaled radionuclides may be absorbed from the lungs, gastrointestinal tract, or from the skin. Air samples collected by the Davis-Besse REMP include **airborne particulate** and **airborne radioiodine**.

Samples are collected weekly with low volume vacuum pumps, which draw a continuous sample through a glass fiber filter and charcoal cartridge at a rate of approximately one cubic foot per minute. Airborne particulate samples are collected on 47 mm diameter filters. Charcoal cartridges are installed downstream of the particulate filters to sample for the airborne radioiodine.

The airborne samples are sent to an offsite contract laboratory for analysis. At the laboratory, the airborne particulate filters are stored for 72 hours before they are analyzed to allow for the decay of naturally-occurring short-lived radionuclides. However, due to the short half-life of iodine-131 (approximately eight days), the airborne radioiodine cartridges are analyzed upon receipt by the contract laboratory.

## Airborne Particulate

Davis-Besse has ten continuous air samplers that monitor for air particulate and iodine. There are six indicator locations including four around the site boundary (T-1, T-2, T-3, and T-4), one at Sand Beach (T-7), and another at a local farm (T-8). There are four control locations, Oak Harbor (T-9), Port Clinton (T-11), Toledo (T-12) and Crane Creek (T-27). Gross beta analysis is performed on each of the weekly samples.



Each quarter, the filters from each location are combined (composite) and analyzed for gamma-emitting radionuclides, Strontium-89 and Strontium-90. Beta-emitting radionuclides were detected at both the indicator and control locations at average concentrations of  $0.026 \text{ pCi/m}^3$ . Beryllium-7 was the only gamma-emitting radionuclide detected by the gamma spectroscopic analysis of the quarterly composites.

Beryllium-7 is a naturally-occurring radionuclide produced in the upper atmosphere by cosmic radiation. No other gamma-emitting radionuclides were detected above their respective LLDs. Strontium-89 and Strontium-90 were not detected above their LLDs. These results show no adverse change in radioactivity in air samples attributable to the operation of the Davis-Besse Nuclear Power Station in 2009.

## Airborne Iodine-131

Airborne iodine-131 samples are collected at the same ten locations as the airborne particulate samples. Charcoal cartridges are placed downstream of the particulate filters. These cartridges are collected weekly, sealed in separate collection bags and sent to the laboratory for gamma analysis. There was no detectable iodine-131 above the LLD of 0.07 pCi/m<sup>3</sup>.

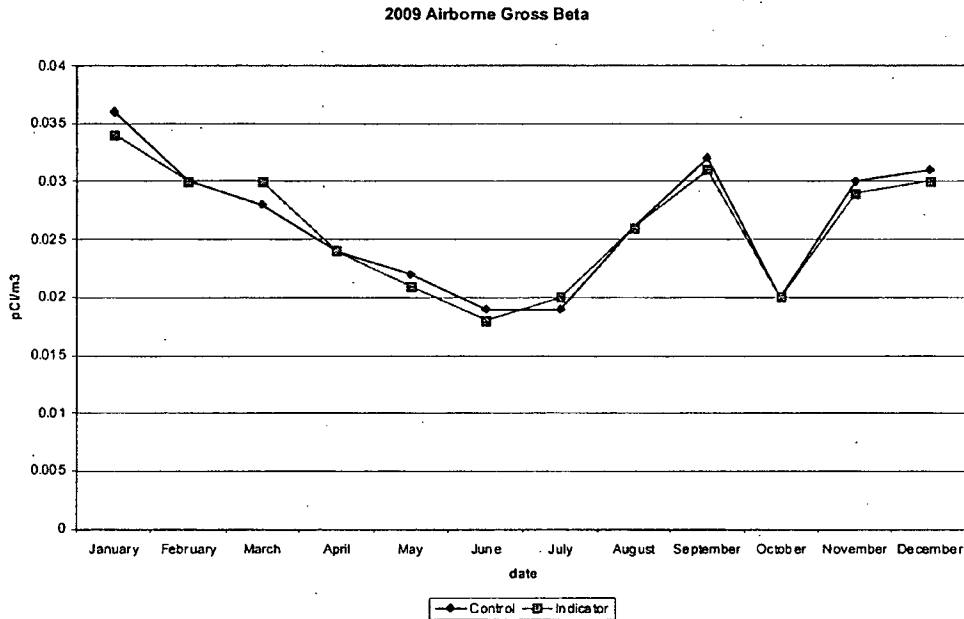


Figure 10. Concentrations of beta-emitting radionuclides in airborne particulate samples were nearly identical at indicator and control locations.

Table 5: Air Monitoring Locations

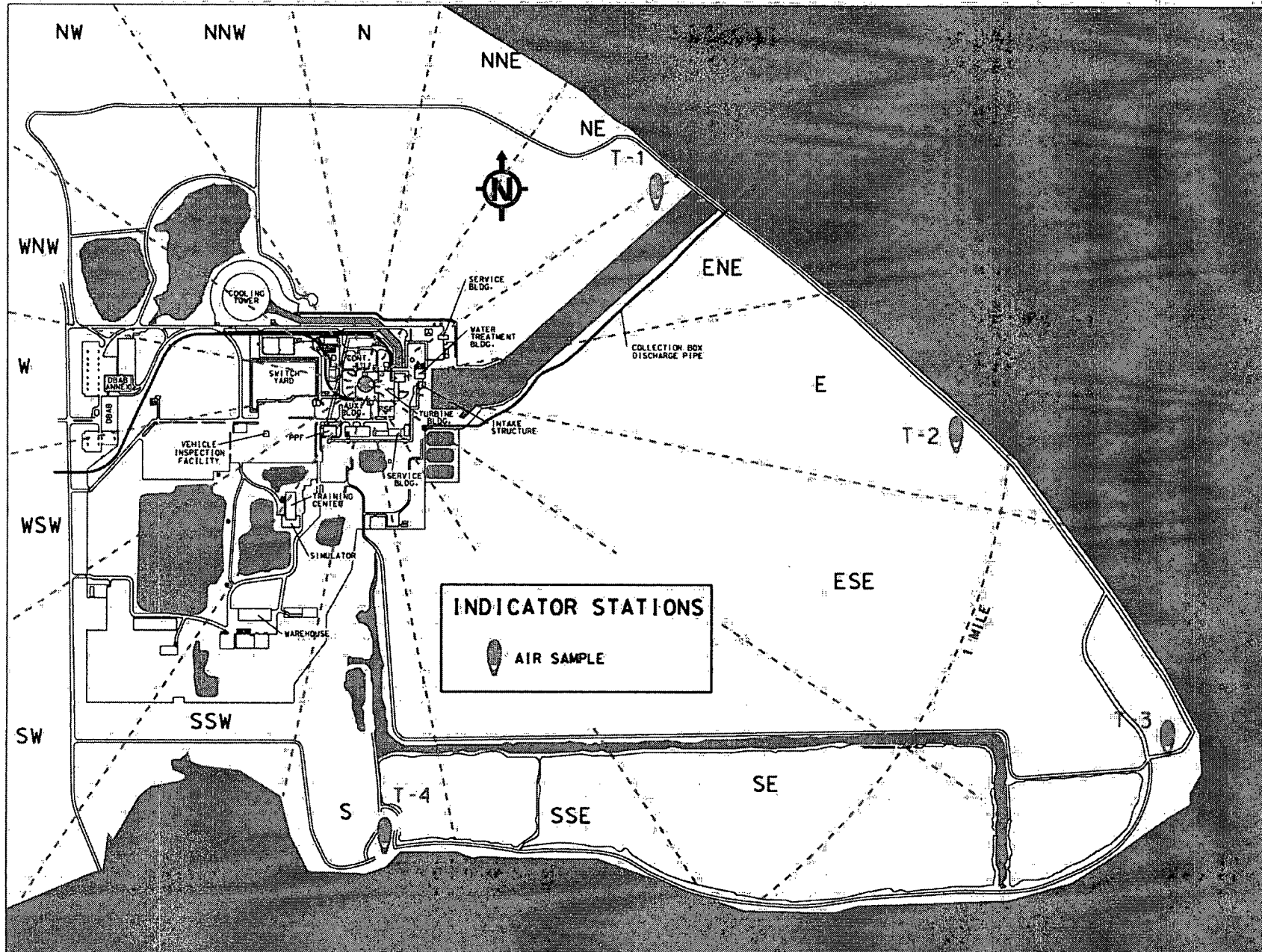
Sample Location Number	Type of Location	Location Description
T-1	I	Site boundary, 0.6 miles ENE of Station
T-2	I	Site boundary, 0.9 miles E of Station
T-3	I	Site boundary, 1.4 miles ESE of Station
T-4	I	Site boundary, 0.8 miles S of Station
T-7	I	Sand Beach, main entrance, 0.9 miles NW of Station
T-8	I	Earl Moore Farm, 2.7 miles WSW of Station
T-9	C	Oak Harbor Substation, 6.8 miles SW of Station
T-11	C	Port Clinton Water Treatment Plant, 9.5 miles SE of Station
T-12	C	Toledo Water Treatment Plant, 20.7 miles WNW of Station
T-27	C	Crane Creek State Park, 5.3 miles WNW of Station

---

I = Indicator C = Control

# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

## AIR SAMPLES: SITE

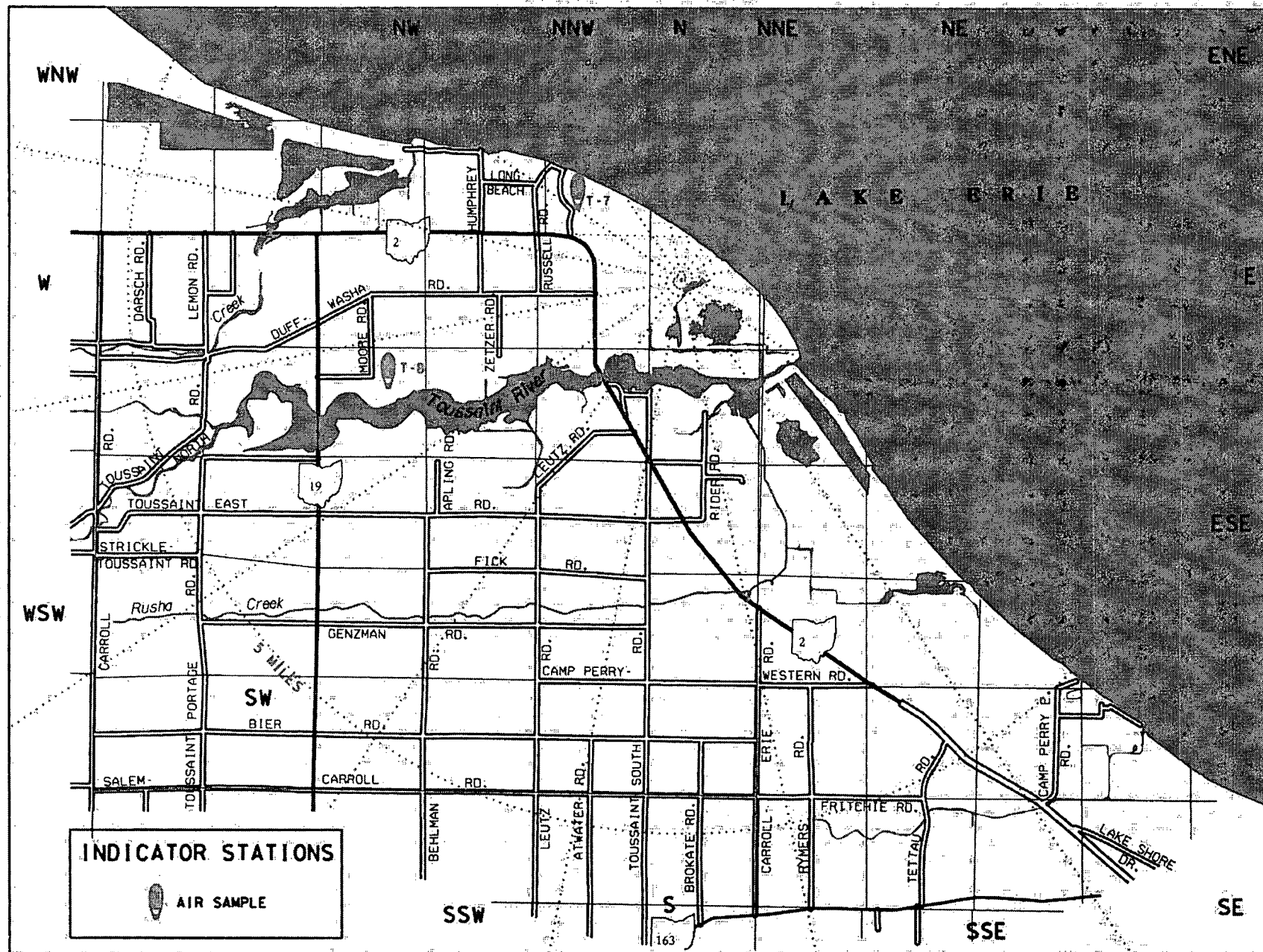


Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Figure 11: Air Sample Site Map

# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

AIR SAMPLES: 5 MILE RADIUS



Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Figure 12: Air Samples 5-mile Map



# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

AIR SAMPLES: 5-25 MILE RADIUS

Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

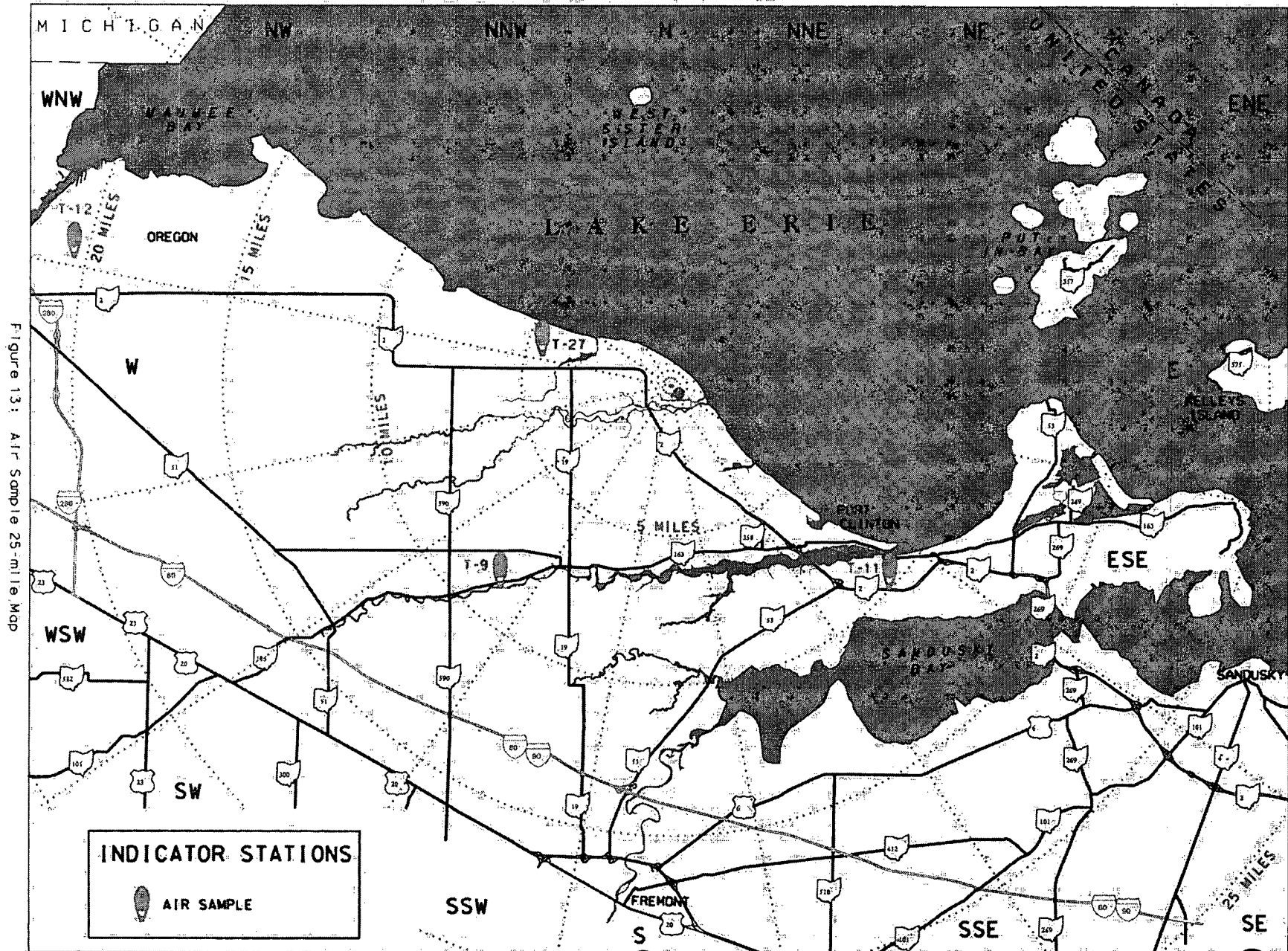


Figure 13: Air Sample 25-mile Map



## Terrestrial Monitoring

The collection and analysis of groundwater, milk, meat, fruits and broad leaf vegetation provides data to assess the buildup of radionuclides that may be ingested by humans. Animal and wildlife feed samples provide additional information on radionuclides that may be present in the food chain. The data from soil sampling provides information on the deposition of radionuclides from the atmosphere.

Many radionuclides are present in the environment due to sources such as cosmic radiation and fallout from nuclear weapons testing. Some of the radionuclides present are:

- **Tritium**, present as a result of the interaction of cosmic radiation with the upper atmosphere and as a result of routine release from nuclear facilities
- **Beryllium-7**, present as a result of the interaction of cosmic radiation with the upper atmosphere
- **Cesium-137**, a manmade radionuclide which has been deposited in the environment, (for example, in surface soils) as a result of fallout from nuclear weapons testing and routine releases from nuclear facilities
- **Potassium-40**, a naturally occurring radionuclide normally found throughout the environment (including in the human body)
- **Fallout radionuclides** from nuclear weapons testing, including Strontium-89, Strontium-90, Cesium-137, Cerium-141, Cerium-144, and Ruthenium-106. These radionuclides may also be released in minute amounts from nuclear facilities

The radionuclides listed above are expected to be present in many of the environmental samples collected in the vicinity of the Davis-Besse Station. The contribution of radionuclides from the operation of Davis-Besse is assessed by comparing sample results with pre-operational data, operational data from previous years, control location data, and the types and amounts of radioactivity normally released from the Station in liquid and gaseous effluents.

### Milk Samples

Milk sampling is a valuable tool in environmental surveillance because it provides a direct basis for assessing the buildup of radionuclides in the environment that may be ingested by humans. Milk is collected and analyzed because it is one of the few foods commonly consumed soon after production. The milk pathway involves the deposition of radionuclides from atmospheric releases onto forage consumed by cows. The radionuclides present in the forage-eating cow are incorporated into the milk, which is then consumed by humans.

When available, milk samples are collected at indicator and control locations once a month from November through April, and twice a month between May and October. Sampling is increased in the summer when the herds are normally outside on pasture and not consuming stored feed. In December of 1993, indicator location T-8 was eliminated from the sampling program, and no other indicator milk site has existed since that time. The control location will continue to be

sampled monthly in order to gather additional baseline data. If any dairy animals are discovered within five miles of the station, efforts will be made to include them in the milk-sampling program as indicator sites.

The 2009 milk samples were analyzed for Strontium-89, Strontium-90, Iodine-131, other gamma-emitting radionuclides, stable Calcium and Potassium. A total of 12 milk samples were collected in 2009. Strontium-89 was not detected above its LLD of 0.7 pCi/l. The annual average concentration of Strontium-90 was 0.8 pCi/l. The annual average concentration was similar to those measured in previous years.

Iodine-131 was not detected in any of the milk samples above the LLD of 0.4 pCi/l. The concentrations of Barium-140 and Cesium-137 were below their respective LLDs in all samples collected.

Since the chemistries of Calcium and Strontium are similar, as are Potassium and Cesium, organisms tend to deposit Cesium radioisotopes in muscle tissue and Strontium radioisotopes in bones. In order to detect the potential environmental accumulation of these radionuclides, the ratios of the Strontium radioactivity (pCi/l) to the concentration of Calcium (g/l), and the Cesium radioactivity (pCi/l) compared to the concentration of Potassium (g/l) were monitored in milk. These ratios are compared to standard values to determine if buildup is occurring. No statistically significant variations in the ratios were observed.

---

**Table 6: Milk Monitoring Location**

---

<b>Sample Location Number</b>	<b>Type of Location</b>	<b>Location Description</b>
T-24	C	Toft Dairy, Sandusky, 21.0 miles SE of Station

---

C = Control

### **Groundwater Samples**

Soil acts as a filter and an ion exchange medium for most radionuclides. However, tritium and other radionuclides such as Ruthenium-106 have a potential to seep through the soil and could reach groundwater. Davis-Besse does not discharge its liquid effluents directly to the ground. In the past, REMP personnel sampled local wells on a quarterly basis to ensure early detection of any adverse impact on the local groundwater supplies due to Station operation. In addition, a quality control sample was collected at one of the wells each quarter. The groundwater samples were analyzed for beta-emitting radionuclides, tritium, Strontium-89, Strontium-90 and gamma-emitting radionuclides.

During the fall of 1998, the Carroll Township Water Plant began operation and offered residents a reliable source of high-quality, inexpensive drinking water. This facility has replaced all of the

drinking water wells near Davis-Besse, as verified by the Ottawa County Health Department, and the indicator groundwater sampling was discontinued for a year. Since that time, two beach wells were located within five miles of the Station. Although the residents are seasonal and only use the township system for their drinking water needs, these wells were added to our sampling program as Indicator locations. The gross beta averaged 2.65 pCi/l at Indicator sites. The Control location at T-27 was not available during 2009. REMP Groundwater samples did not appear to be affected by the operation of the Davis-Besse Nuclear Power Station.

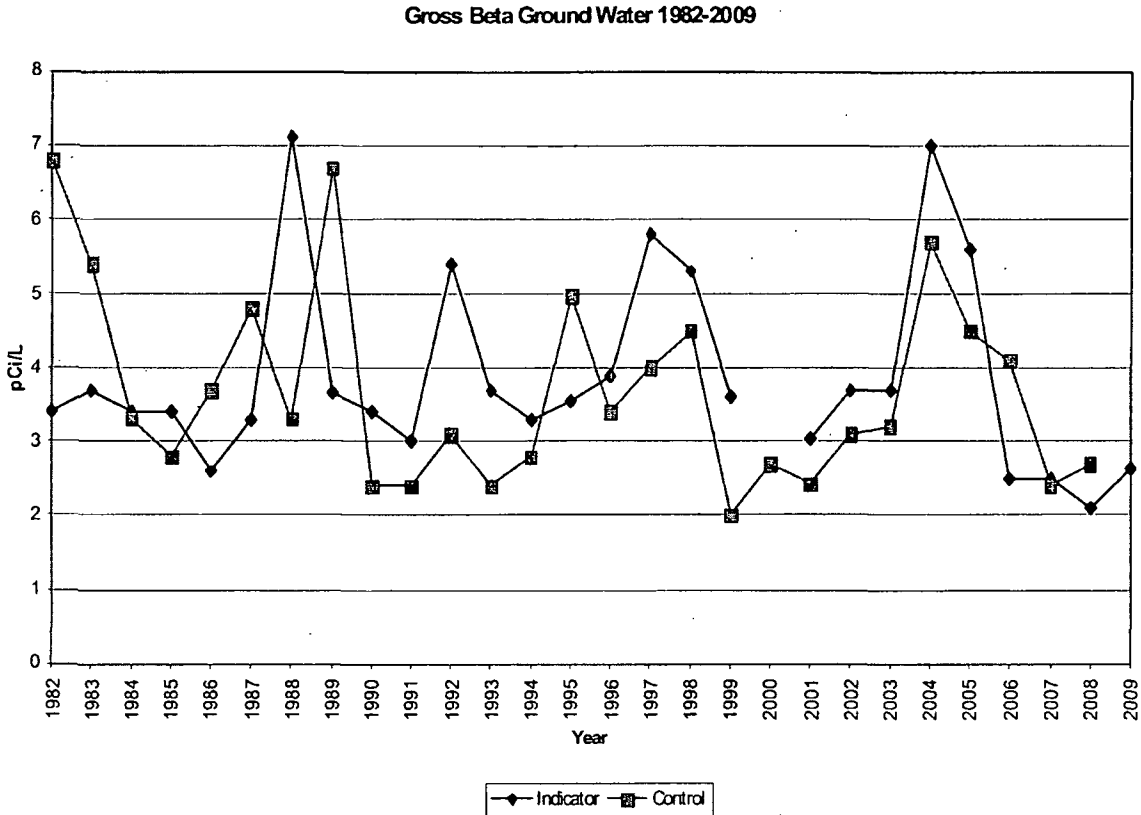


Figure 14: Shown above are the annual averages for gross beta in groundwater from 1982-2009. There were no known indicator samples available in 2000 and the normal control sample was unavailable in 2009.

Table 7: Groundwater Monitoring Locations

Sample Location Number	Type of Location	Location Description
T-225	I	Long Beach and Park, 1.5 mi NW of Station
T-226	I	Allen residence, 1.6 miles NW of Station

C = control I = indicator

### Broadleaf Vegetation and Fruit Samples

Fruits and broadleaf vegetation also represent a direct pathway to humans. Fruits and broadleaf vegetation may become contaminated by deposition of airborne radioactivity (nuclear weapons fallout or airborne releases from nuclear facilities), or from irrigation water drawn from lake water which receives liquid effluents (hospitals, nuclear facilities, etc.). Radionuclides from the soil may be absorbed by the roots of the plants and become incorporated into the edible portions. During the growing season, edible broadleaf vegetation samples, such as kale and cabbage, are collected from gardens and farms in the vicinity of the Station. Fruit, such as apples, is collected from orchards in the vicinity of Davis-Besse.

In 2009, broadleaf vegetation samples were collected at two indicator locations (T-227 and T-19) and one control location (T-37). Fruit samples were collected at two indicator locations (T-8 and T-25) and one control location (T-209). Broadleaf vegetation was collected once per month during the growing season and consisted of cabbage. The fruit that was collected was apples. All samples were analyzed for gamma-emitting radionuclides, Strontium-89, Strontium-90, and Iodine-131.

Iodine-131 was not detected above the LLD of 0.017 pCi/g (wet) in any broadleaf vegetation nor above the LLD of 0.009 pCi/g (wet) in fruit samples. The only gamma-emitting radionuclide detected in the fruit and broadleaf vegetation samples was Potassium-40, which is naturally occurring. Results of broadleaf vegetation and fruit samples were similar to results observed in previous years. Neither Strontium 89 and Strontium 90 were detected in broadleaf or in apple samples. Operation of Davis-Besse had no observable adverse radiological effect on the surrounding environment in 2009.

Table 8: Broadleaf Vegetation and Fruit Locations

Sample Location Number	Type of Location	Location Description
T-8	I	Moore Farm, 2.7 miles WSW of Station
T-19	I	L. Bowyer Jr., 1.0 mile W of Station
T-25	I	Witt Farm, 1.6 miles S of Station
T-37	C	Bench Farm, 13.0 miles SW of Station
T-209	C	Roving Control Fruit location
T-227	I	Roving BLV location

I = indicator, C = control

#### Animal/Wildlife Feed Samples

Vegetation consumed by wildlife can provide an indication of airborne radionuclides deposited in the vicinity of the Station. Analyses of wildlife feed samples can also provide data for determining radionuclide concentration in the food chain. Wildlife feed samples are collected from the Navarre Marsh and from a local marsh within five miles of the Station. As in all terrestrial samples, naturally occurring Potassium-40, cosmic ray-produced radionuclides such as Beryllium-7, and fallout radionuclides such as Strontium-89 and Strontium-90 from nuclear weapons testing may be present in the feed samples.

Wildlife feed was collected at three locations (T-31, T-32 and T-198), and consisted of the edible portions of cattails. Samples were analyzed for gamma-emitting radionuclides. Naturally occurring Potassium-40 was detected in all samples. Beryllium-7 was detected at indicator location T-31 at 0.4 pCi/g (wet), and 0.29 pCi/g (wet) at the control location. All other radionuclides were below their respective LLDs. These samples indicate that the operation of Davis-Besse had no observable adverse effects on the surrounding environment.

Table 9: Animal/Wildlife Feed Locations

Sample Location Number	Type of Location	Location Description
T-31	I	Davis-Besse Navarre Marsh
T-32	C	Roving offsite location, 7.0 miles W of station in 2008
T-198	I	Toussaint Creek Wildlife Area, 4.0 miles WSW of the Station

I = indicator

C = control

### Wild Meat Samples

Sampling of wild meat provides information on environmental radionuclide concentrations that humans may be exposed to through an ingestion pathway. The principle pathways for radionuclide contamination of meat animals include deposition of airborne radioactivity in their food and drinking water and contamination of their drinking water from radionuclides released in liquid effluents.

The REMP generally collects wild meat on an annual basis. Wild animals commonly consumed by residents in the vicinity of Davis-Besse include waterfowl, deer, rabbits and muskrats. Analyses from these animals provide general information on radionuclide concentration in the food chain. When evaluating the results from analyses performed on meat animals, it is important to consider the age, diet and mobility of the animal before drawing conclusions from radionuclide concentrations in the local environment or in a species as a whole.

Meat samples were taken in 2009 as follows:

- Wild Meat: Muskrat samples were collected on Station property in Navarre Marsh and at a control location west of Crane Creek. The samples showed only naturally-occurring activity.

Table 10: Wild Meat Locations

Sample Location Number	Type of Location	Location Description
T-31	I	Onsite roving location
T-210	C	Roving offsite location (7.0 mi. W of the Station in 2009)

I = indicator C = control

### Soil Samples

Soil samples are generally collected once a year adjacent to our ten continuous air samplers. Only the top layer of soil is sampled in an effort to identify possible trends in the local environmental nuclide concentration caused by atmospheric deposition of fallout and station-released radionuclides. Generally, the sites are relatively undisturbed, so that the sample will be representative of the actual deposition in the area. Ideally, there should be little or no vegetation present, because the vegetation could affect the results of analyses. Approximately five pounds of soil are taken from the top two inches at each site. Many naturally occurring radionuclides such as Beryllium-7 (Be-7), Potassium-40 (K-40) and fallout radionuclides from nuclear weapons testing are detected. Fallout radionuclides that are often detected include Strontium-90 (Sr-90) and Cesium-137 (Cs-137).

Soil was collected at ten sites in 2009. The indicator locations included T-1, T-2, T-3, T-4, T-7, and T-8. The control locations were T-9, T-11, T-12, and T-27. All soil samples were analyzed for gamma-emitting radionuclides. The only gamma emitter detected (in addition to naturally occurring Be-7 and K-40) was Cs-137. Cs-137 was found in Indicator and Control locations at average concentrations of 0.15 pCi/g (dry) and 0.12 pCi/g (dry), respectively. The concentrations were similar to that observed in previous years (Figure 15).

### Cs-137 in Soil 1972-2009

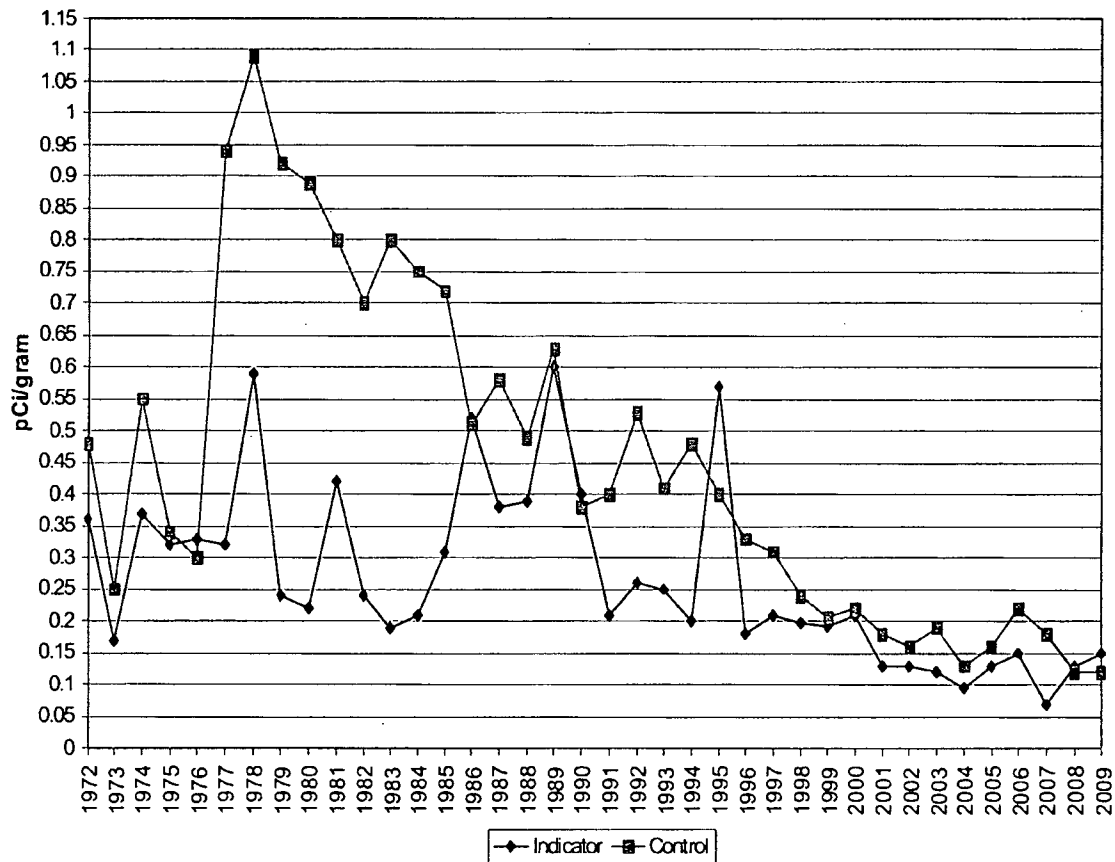


Figure 15: The concentration of Cesium-137 in soil has steadily declined in recent years. The peak seen in 1978 was due to fallout from nuclear weapons testing.



Table 11: Soil Locations

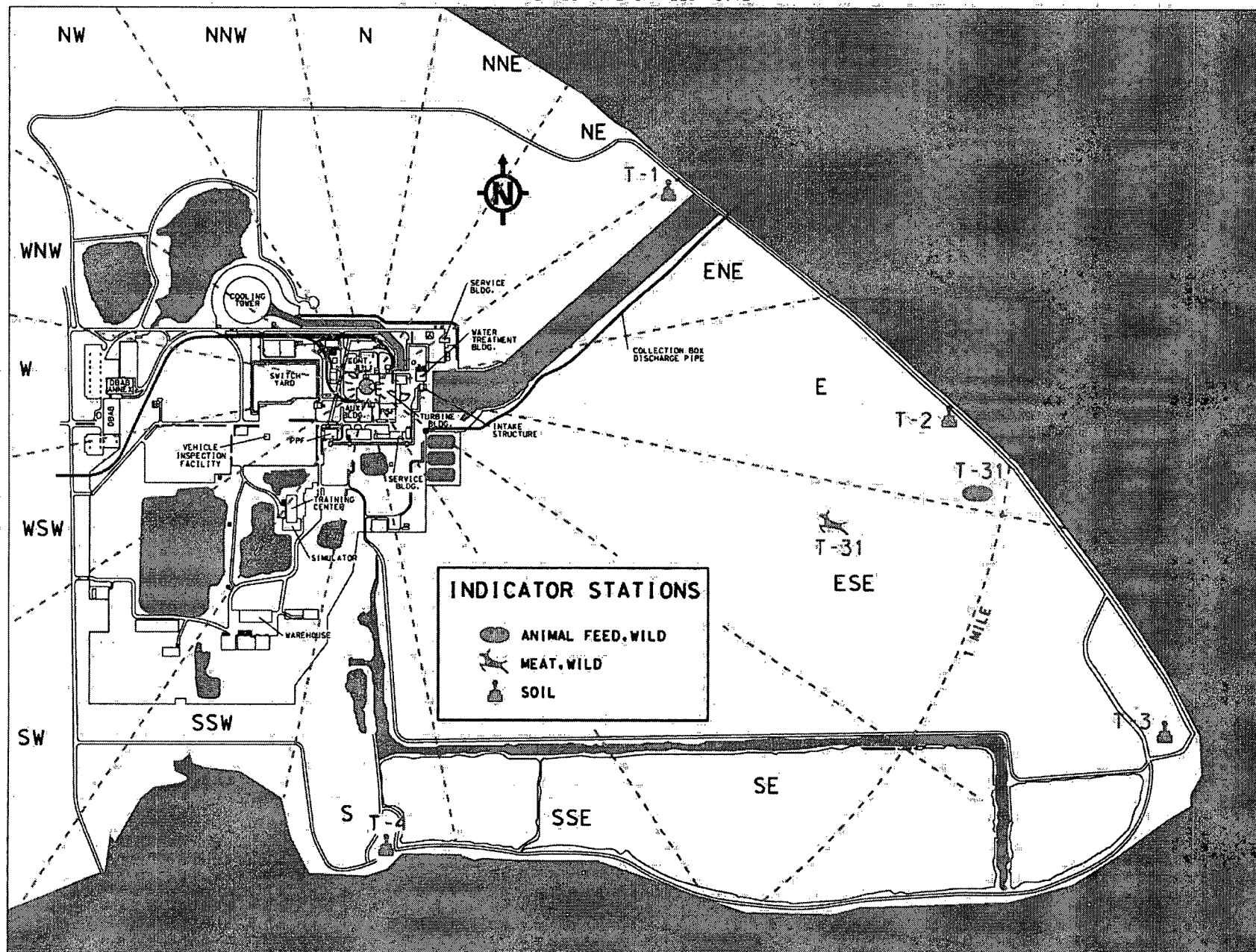
Sample Location Number	Type of Location	Location Description
T-1	I	Site boundary, 0.6 miles ENE of Station
T-2	I	Site boundary, 0.9 miles E of Station
T-3	I	Site boundary 1.4 miles ESE of Station
T-4	I	Site boundary 0.8 miles S of Station
T-7	I	Sand Beach, main entrance, 0.9 miles NW of Station
T-8	I	Moore Farm, 2.7 miles WSW of Station
T-9	C	Oak Harbor Substation, 6.8 miles SW of Station
T-11	C	Port Clinton Water Treatment Plant, 9.5 miles SE of Station
T-12	C	Toledo Water Treatment Plant, 20.7 miles WNW of Station
T-27	C	Crane Creek State Park, 5.3 miles WNW of Station

I = indicator C = control

# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM TERRESTRIAL SAMPLES: SITE

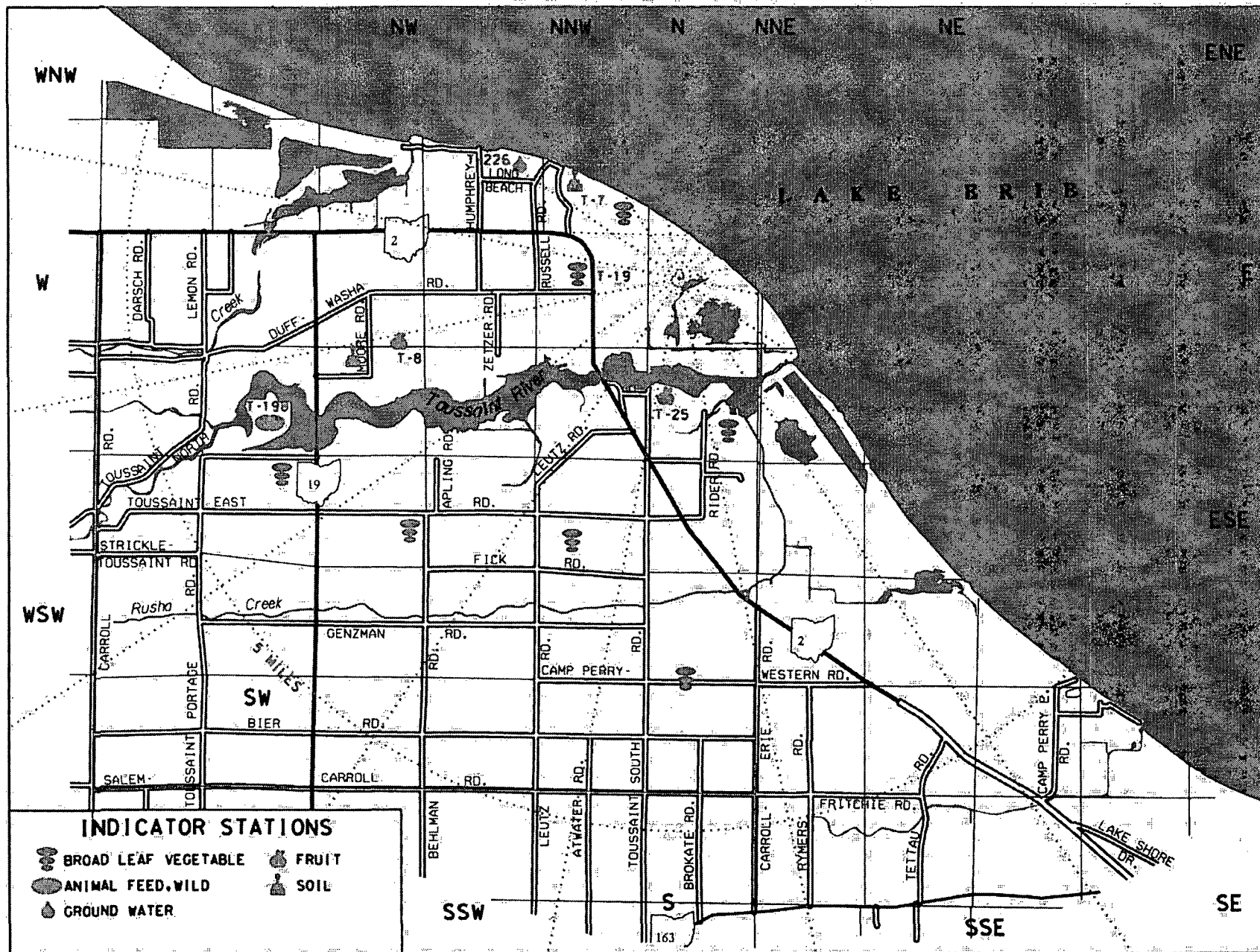
Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Monitoring Operating Report

Figure 16: Terrestrial Site Map



# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

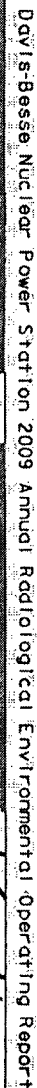
TERRESTRIAL SAMPLES: 5 MILE RADIUS



Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Figure 17: Terrestrial 5-mile Map

TERRESTRIAL SAMPLES: 5-25 MILE RADIUS



## Aquatic Monitoring



Radionuclides may be present in Lake Erie from many sources including atmospheric deposition, run-off/soil erosion, and releases of radioactive material in liquid effluents from hospitals or nuclear facilities. These sources provide two forms of potential exposure to radiation, external and internal. External exposure can occur from the surface of the water, shoreline sediments and from immersion (swimming) in the water. Internal exposure can occur from ingestion of radionuclides, either directly from drinking water, or as a result of the transfer of radionuclides through the aquatic food chain with eventual consumption of aquatic organisms, such as fish. To monitor these pathways, Davis-Besse samples treated surface water (drinking water), untreated surface water (lake or river water), fish, and shoreline sediments.

### Treated Surface Water

Treated surface water is water from Lake Erie, which has been processed for human consumption. Radiochemical analysis of this processed water provides a direct basis for assessing the dose to humans from ingestion of drinking water.

Samples of treated surface water were collected from two indicators (T-22B and T-50) and two control locations (T-11 and T-12). These locations include the water treatment facilities for Carroll Township, Erie Industrial Park, Port Clinton and Toledo. Samples were collected weekly and composited monthly. The monthly composites were analyzed for beta-emitting radionuclides. The samples were also composited in a quarterly sample and analyzed for Strontium-89, Strontium-90, gamma-emitting radionuclides, and tritium. One QC sample was collected from a routine location, which was changed each month.

The annual average of beta-emitting radionuclides for indicator and control locations was 1.8 and 1.5 pCi/l, respectively. These results are similar to previous years shown in Figure 19. Tritium



was not detected above the LLD of 330 pCi/l during 2009. Strontium-89 was not detected above the LLD of 1.3 pCi/l. Strontium-90 activity was not detected above its LLD of 0.7 pCi/l. These results are similar to those of previous years and indicate no adverse impact on the environment resulting from the operation of Davis-Besse during 2009.

Each month, weekly quality control samples were collected at different locations. The results of the analyses from the quality control samples were in agreement with the routine samples. The average concentration of beta-emitting radionuclides detected at the QC locations was 1.6 pCi/l.

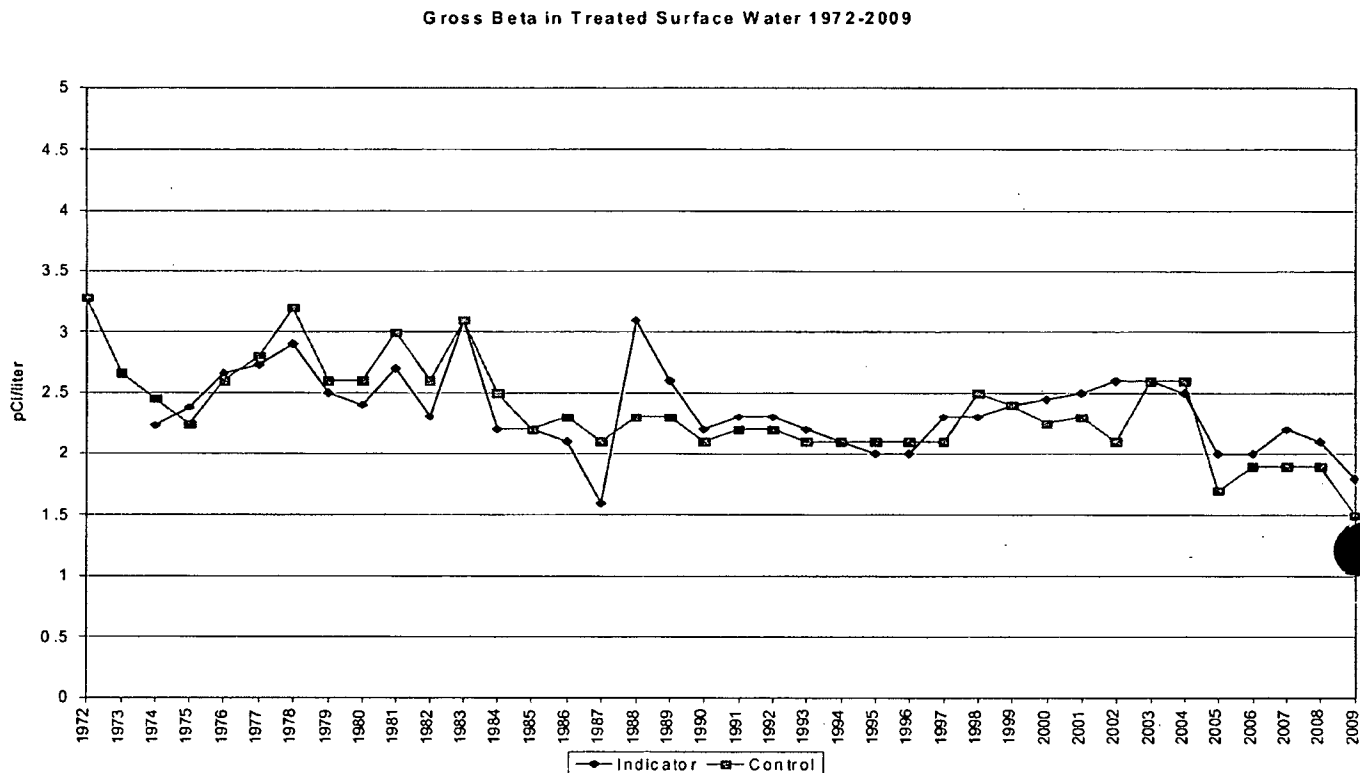


Figure 19: Since 1974, the annual concentrations of beta emitting radionuclides in treated surface water samples collected from indicator locations have been consistent with those from control locations. Davis-Besse has had no measurable radiological impact on surface water used to make drinking water.

Table 12: Treated Surface Water Locations

Sample Location Number	Type of Location	Location Description
T-11	C	Port Clinton Water Treatment Plant, 9.5 miles SE of Station
T-12	C	Toledo Water Treatment Plant, 20.7 miles WNW of Station
T-22B	I	Carroll Township Water Treatment Plant, sampled at Davis-Besse REMP lab
T-50	I	Erie Industrial Park, Port Clinton, 4.5 miles SE of Station
T-143	QC	Quality Control Site

I = indicator  
C = control  
QC = quality control

## Untreated Surface Water

Sampling and analysis of untreated surface water provides a method of assessing the dose to humans from external exposure from the lake surface as well as from immersion in the water. It also provides information on the radionuclides present, which may affect drinking water, fish, and irrigated crops.



## Routine Program

The routine program is the basic sampling program that is performed year round. Untreated water samples are collected from water intakes used by nearby water treatment plants. Routine samples are collected at Port Clinton, Toledo, Carroll Township and Erie Industrial Park. A sample is also collected from Lake Erie at the mouth of the Toussaint River. These samples are collected weekly and composited monthly. The monthly composite is analyzed for beta-emitting radionuclides, tritium, and gamma-emitting radionuclides. The samples are also composited quarterly and analyzed for Strontium-89 and Strontium-90. A QC sample is also collected weekly, with the location changing each month.



## Sample Results

For the routine untreated surface water samples that are composited weekly, the beta emitting radionuclides had an average concentration of 2.3 pCi/L at indicator locations during 2009. Control locations averaged 2.0 pCi/L during this period.

Tritium was detected at untreated surface water indicator sites twice during 2009. Sample location T-3 tritium was 901 pCi/l in April and location T-22 tritium was 739 pCi/l in September. The detectable tritium was likely from the operation of the plant, and was below the EPA drinking water limit of 20,000 pCi/l.

Each month, weekly composited quality control samples were analyzed from different locations. The results of the analyses from the quality control samples were consistent with the routine samples, and averaged 2.5 pCi/L of beta emitting radionuclides.

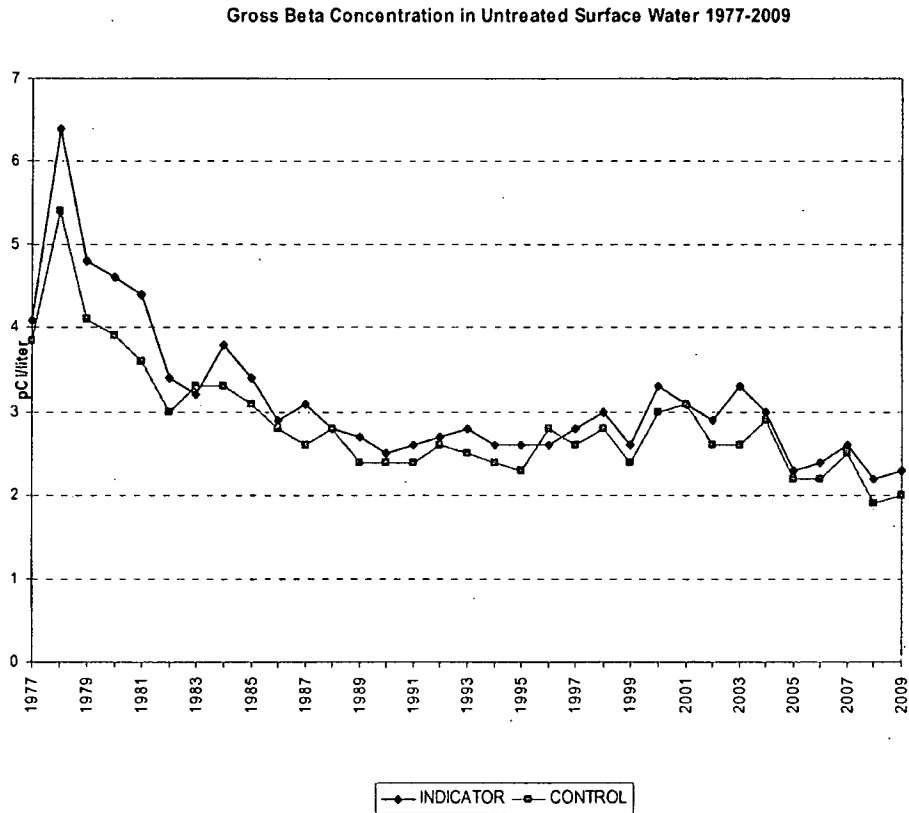


Figure 20: The average concentration of beta-emitting radionuclides in untreated water was similar between control and indicator locations. This demonstrates that Davis-Besse had no significant radiological impact on the surrounding environment.

Table 13: Untreated Surface Water Locations

Sample Location Number	Type of Location	Location Description
T-3	I	Site boundary, 1.4 miles ESE of Station
T-11	C	Port Clinton Water Treatment Plant, 9.5 miles SE of Station
T-12	C	Toledo Water Treatment Plant, sample taken from intake crib, 12.6 miles NW of Station
T-22A	I	Carroll Township Water Plant, State Route 2, 2.1 miles NW of Station
T-50	I	Erie Industrial Park, Port Clinton, 4.5 miles SE of Station
T-145	QC	Roving Quality Control Site

I = indicator, C = control

## Shoreline Sediment

The sampling of shoreline sediments can provide an indication of the accumulation of insoluble radionuclides which could lead to internal exposure to humans through the ingestion of fish, through re-suspension into drinking water supplies, or as an external radiation source from shoreline exposure to fishermen and swimmers.

Samples of deposited sediments in water along the shore were collected at various times from three indicator sites (T-3, T-4, and T-132) and one control location (T-27). Samples were analyzed for gamma-emitting radionuclides. Naturally occurring Potassium-40 was detected at both control and indicator locations. These results are similar to previous years.

---

Table 14: Shoreline Sediment Locations

---

Sample Location Number	Type of Location	Location Description
T-3	I	Site boundary, 1.4 miles ESE of Station
T-4	I	Site boundary, 0.8 miles S of Station
T-27	C	Crane Creek State Park, 5.3 miles WNW of Station
T-132	I	Lake Erie, 1.0 miles E of Station

---

I = indicator C = control

## Fish

Fish are analyzed primarily to quantify the dietary radionuclide intake by humans, and secondarily to serve as indicators of radioactivity in the aquatic ecosystem. The principal nuclides that may be detected in fish include naturally-occurring Potassium-40, as well as Cesium-137, and Strontium-90. Depending upon the feeding habit of the species (e.g., bottom-feeder versus predator), results from sample analyses may vary.

Davis-Besse routinely collects three species of fish once per year from sampling locations near the Station's liquid discharge point and more than ten miles away from the Station where fish populations would not be expected to be impacted by the Station operation. Walleye are collected because of being a popular sport fish and white perch and white bass are collected because their importance as a commercial fish. Carp are collected because they feed on the bottom where contaminants may settle.

The average concentration of beta-emitting radionuclides in fish was similar for indicator and control locations (4.38 pCi/g and 4.86 pCi/g wet weight, respectively). No other gamma emitters were detected above their respective LLDs.

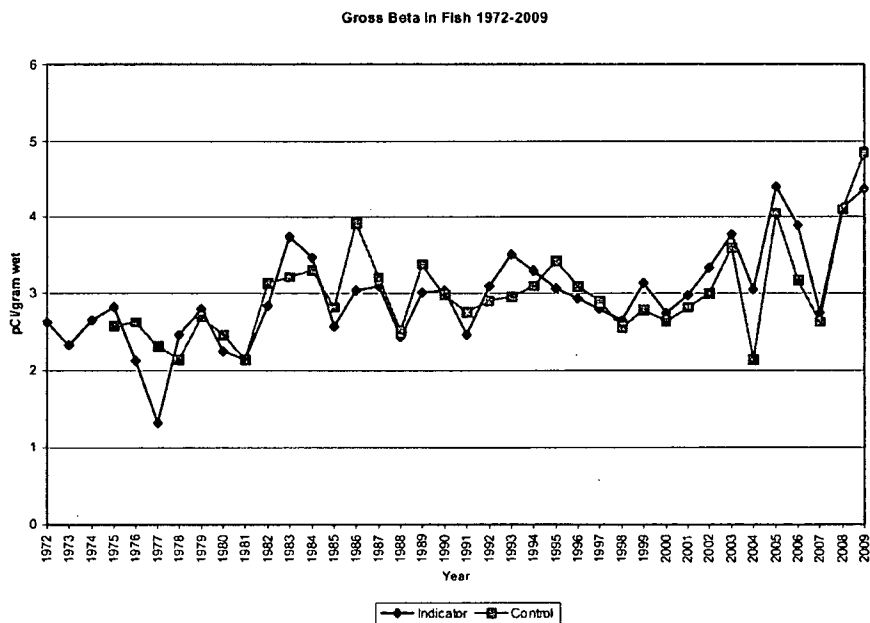


Figure 21: Average concentrations of beta-emitting radionuclides in fish samples were similar at indicator and control locations, and were similar to results of previous years.

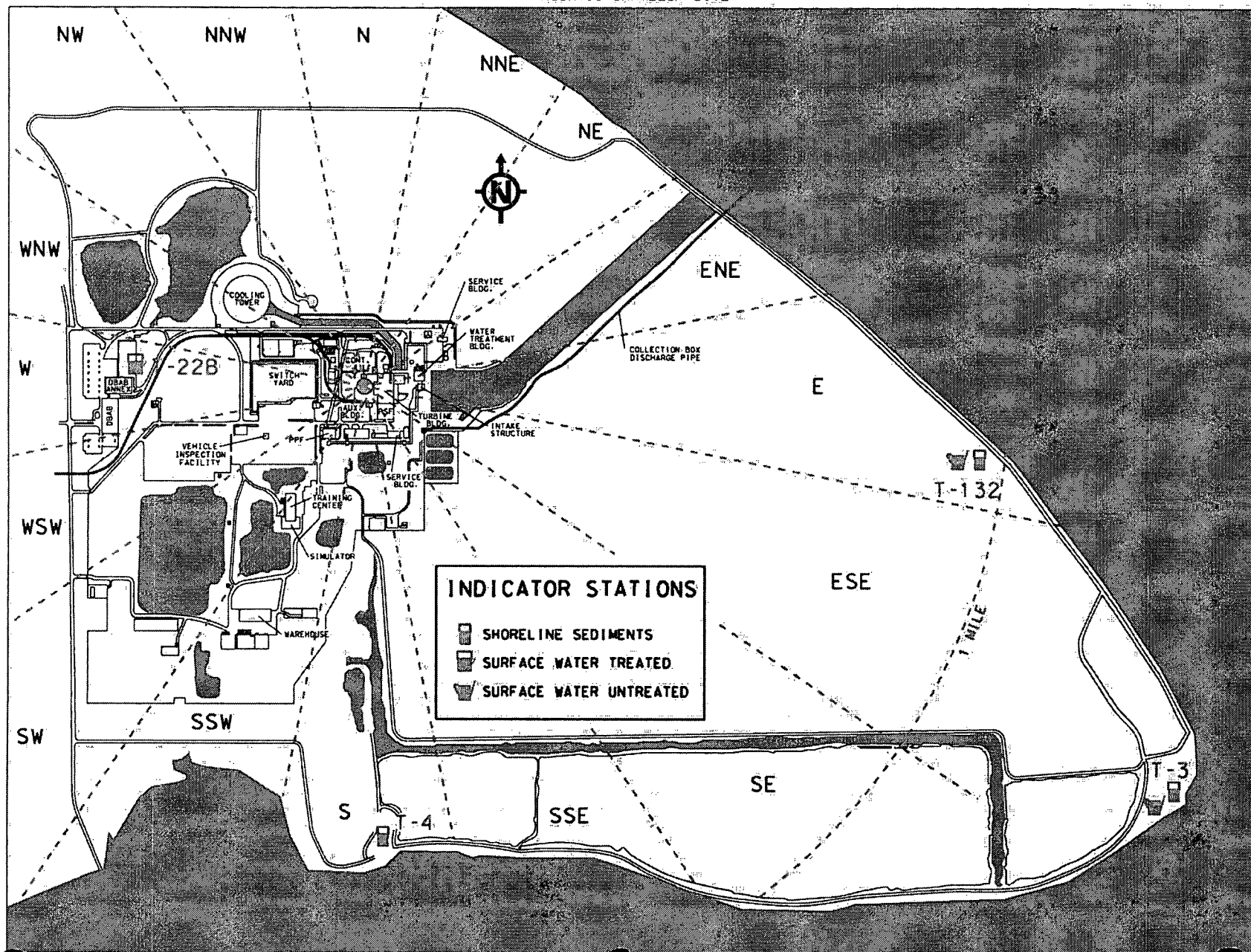
Table 15: Fish Locations

Sample Location Number	Type of Location	Location Description
T-33	I	Lake Erie, within 5 miles radius of Station
T-35	C	Lake Erie, greater than 10 mile radius of Station

I = indicator C= control

# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

## AQUATIC SAMPLES: SITE

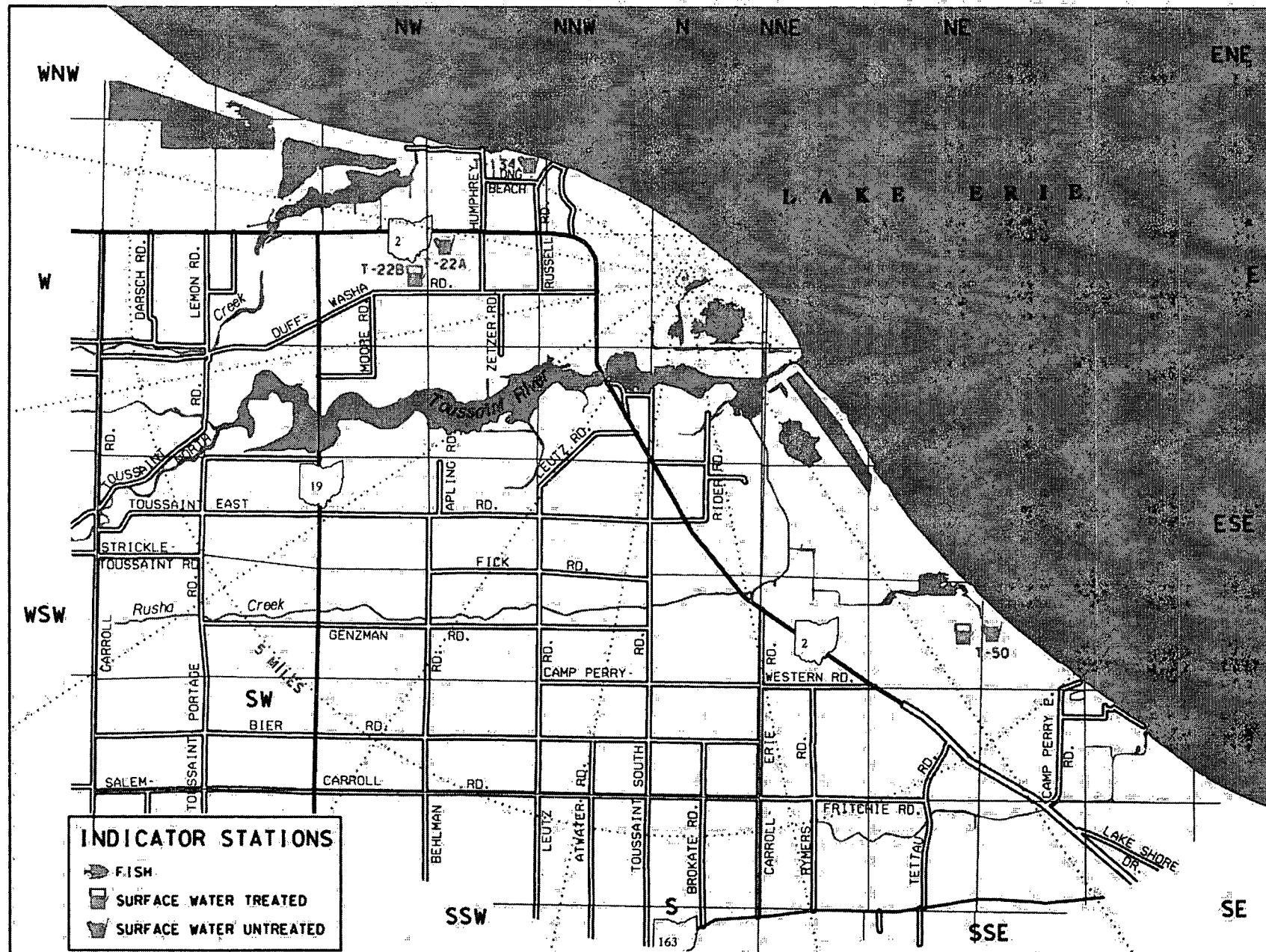


Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Figure 22: Aquatic Site Map

# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

AQUATIC SAMPLES: 5 MILE RADIUS



Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Figure 23: Aquatic 5-mile Map

# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

AQUATIC SAMPLES: 5-25 MILE RADIUS

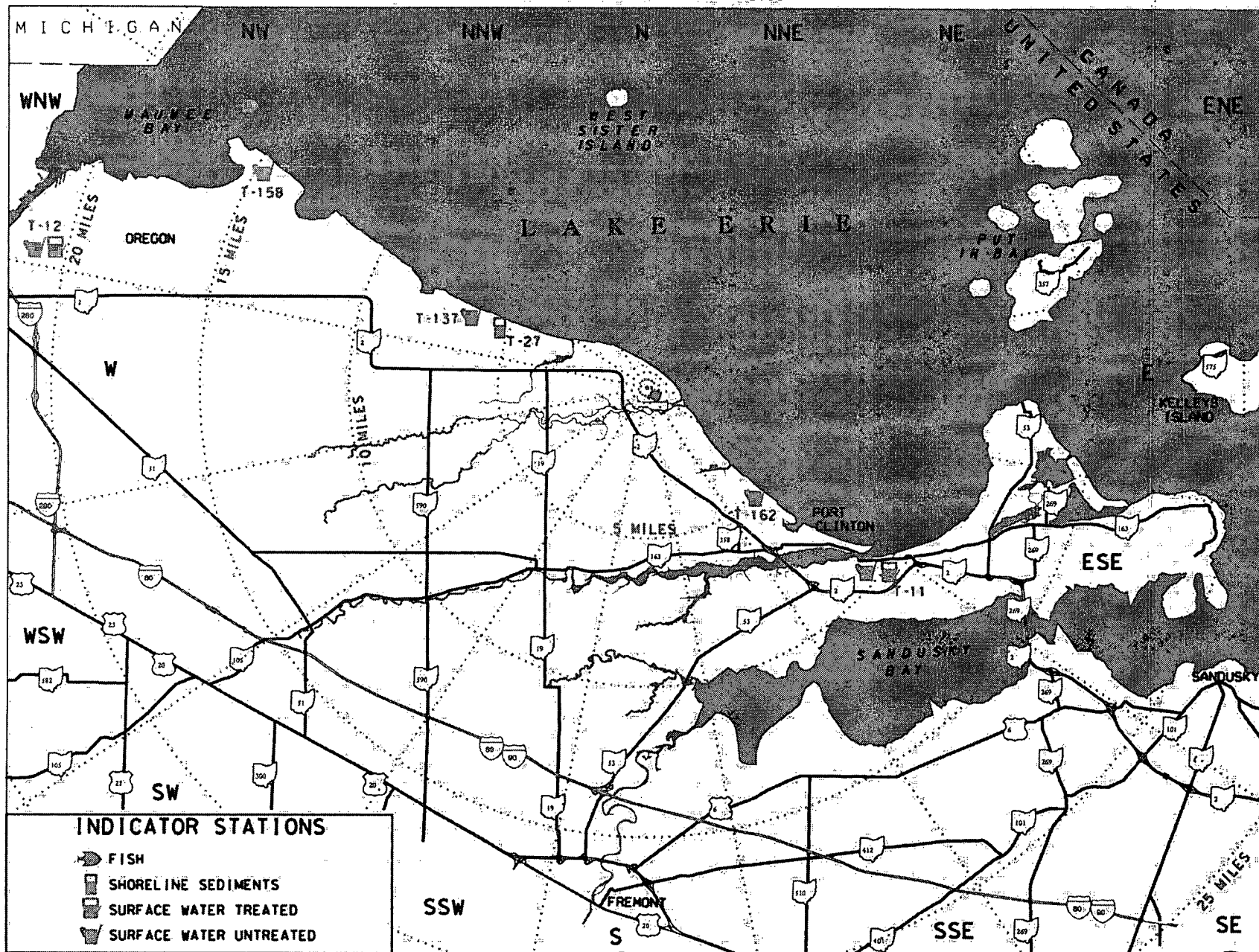


Figure 24: Aquatic 25-mile Map



## Direct Radiation Monitoring

### Thermoluminescent Dosimeters

Radionuclides present in the air and deposited on the ground may directly irradiate individuals. Direct radiation levels at and around Davis-Besse are constantly monitored by thermoluminescent dosimeters (TLDs). TLDs are small devices which store radiation dose information. The TLDs used at Davis-Besse contain a Sulfate:Dysprosium ( $\text{CaSO}_4\text{:Dy}$ ) card with four main readout areas. Multiple readout areas are used to ensure the precision of the measurements.

Thermoluminescence is a process in which ionizing radiation interacts with phosphor, which is the sensitive material in the TLD. Energy is trapped in the TLD material and can be stored for several months or years. This provides an excellent method to measure the dose received over long periods of time. The energy that was stored in the TLD as a result of interaction with radiation is released and measured by a controlled heating process in a calibrated reading system. As the TLD is heated, the phosphor releases the stored energy in the form of light. The amount of light detected is directly proportional to the amount of radiation to which the TLD was exposed. The reading process re-zeroes the TLD and prepares it for reuse.

### TLD Collection

Davis-Besse has 88 TLD locations (77 indicator and 11 control locations). TLDs are collected and replaced on a quarterly and annual basis. Nineteen QC TLDs are also collected on this schedule. There are a total of 214 TLDs in the environment surrounding Davis-Besse. By collecting them on a quarterly and annual basis from a single site, each measurement serves as a quality control check on the other. All ODCM quarterly and annual TLDs placed in the field were retrieved and evaluated during the current reporting period.

In 2009, the average dose equivalent for quarterly TLDs at indicator locations was 16.3 mrem/91 days, and for control locations was 17.6 mrem/91 days. The average dose equivalent for annual TLDs in 2009 was 57.9 mrem/365 days at indicator locations and 62.0 mrem/365 days for control locations.

### Quality Control TLDs

Duplicate TLDs have been placed at 18 sites. These TLDs are placed in the field at the same time and location as some of the routine TLDs, but are assigned quality control site numbers. This allows us to take several measurements at the location without the laboratory being aware that they are the same. A comparison of the quality control and routine results provides a method to check the accuracy of the measurements. The average dose equivalent of indicator quality control TLDs averaged 13.8 mrem/91 days while the quality control TLDs at control locations yielded an average dose equivalent of 16.1 mrem/91 days.

## Direct Radiation Monitoring

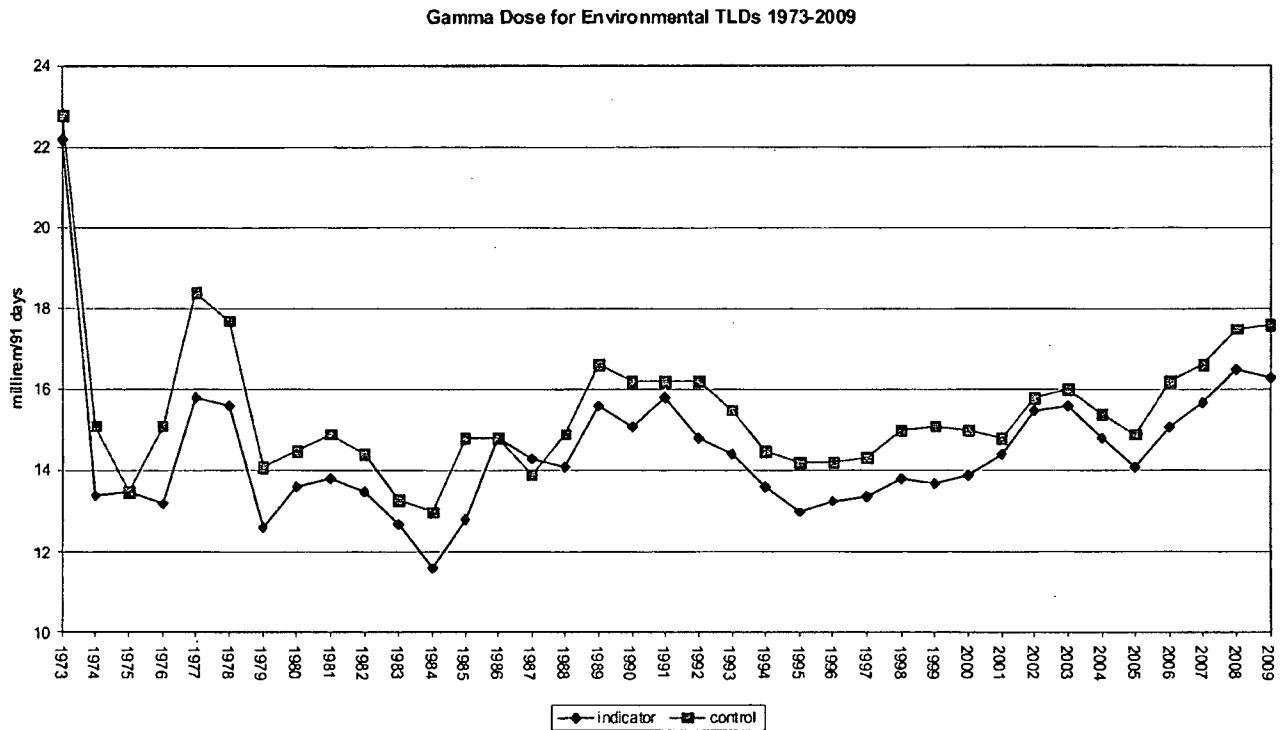


Figure 25: The similarity between indicator and control results demonstrates that the operation of Davis-Besse has not caused any abnormal gamma dose.

Table 16: Thermoluminescent Dosimeter Locations

Sample Location Number	Type of Location	Location Description
T-1	I	Site boundary, 0.6 miles ENE of Station
T-2	I	Site boundary, 0.9 miles E of Station
T-3	I	Site boundary, 1.4 miles ESE of Station
T-4	I	Site boundary, 0.8 miles S of Station
T-5	I	Site boundary, 0.5 miles W of Station
T-6	I	Site boundary, 0.5 miles NNE of Station
T-7	I	Sand Beach entrance, 0.9 miles NW of Station
T-8	I	Earl Moore Farm, 2.7 miles WSW of Station
T-9	C	Oak Harbor Substation, 6.8 miles SW of Station
T-10	I	Site boundary, 0.5 miles SSW of Station near warehouse
T-11	C	Port Clinton Water Treatment Plant, 9.5 miles SE of Station
T-12	C	Toledo Water Treatment Plant, 20.7 miles WNW of Station
T-24	C	Sandusky, 21.0 miles SE of Station
T-27	C	Crane Creek State Park, 5.3 miles WNW of Station
T-38	I	Site boundary, 0.6 miles ENE of Station
T-39	I	Site boundary 1.2 miles ENE of Station
T-40	I	Site boundary, 0.7 miles SE of Station
T-41	I	Site boundary, 0.6 miles SSE of Station
T-42	I	Site boundary, 0.8 miles SW of Station

Table 16: Thermoluminescent Dosimeter Locations (continued)

Sample Location Number	Type of Location	Location Description
T-43	I	Site boundary, 0.5 miles SW of Station
T-44	I	Site boundary, 0.5 miles WSW of Station
T-45	I	Site boundary, 0.5 miles WNW of Station
T-46	I	Site boundary, 0.5 miles NW of Station
T-47	I	Site boundary, 0.5 miles N of Station
T-48	I	Site boundary, 0.5 miles NE of Station
T-49	I	Site boundary, 0.5 miles NE of Station
T-50	I	Erie Industrial Park, Port Clinton, 4.5 miles SE of Station
T-51	C	on Siren Pole, 5.5 miles SSE of Station
T-52	I	Miller Farm, 3.7 miles S of Station
T-53	I	Nixon Farm, 4.5 miles S of Station
T-54	I	McNutt residence, 4.8 miles SW of Station
T-55	I	King Farm, 4.5 miles W of Station
T-60	I	Site boundary, 0.3 miles S of Station
T-62	I	Site boundary, 1.0 mile SE of Station
T-65	I	Site boundary, 0.3 miles E of Station
T-66	I	Site boundary, 0.3 miles ENE of Station
T-67	I	Site boundary, 0.3 miles NNW of Station
T-68	I	Site boundary, 0.5 miles WNW of Station
T-69	I	Site boundary, 0.4 miles W of Station

Table 16: Thermoluminescent Dosimeter Locations (continued)

Sample Location Number	Type of Location	Location Description
T-71	I	Site boundary, 0.1 mile NNW of Station
T-73	I	Site boundary, 0.1 mile WSW of Station
T-74	I	Site boundary, 0.1 mile SSW of Station
T-75	I	Site boundary, 0.2 mile SSE of Station
T-76	I	Site boundary, 0.1 mile SE of Station
T-80	QC	Quality Control Site
T-81	QC	Quality Control Site
T-82	QC	Quality Control Site
T-83	QC	Quality Control Site
T-84	QC	Quality Control Site
T-85	QC	Quality Control Site
T-86	QC	Quality Control Site
T-88	QC	Quality Control Site
T-87	QC	Quality Control in lead pig DBAB Annex
T-89	QC	Quality Control Site
T-90	I	Site Personnel Processing Facility
T-91	I	State Route 2 and Rankie Road, 2.5 miles SSE
T-92	I	Locust Point Road, 2.7 miles WNW of Station
T-93	I	Twelfth Street, Sand Beach, 0.6 miles NNE of Station
T-94	I	State Route 2, 1.8 miles WNW of Station
T-95	C	State Route 579, 9.3 miles W of Station

Table 16: Thermoluminescent Dosimeter Locations (continued)

Sample Location Number	Type of Location	Location Description
T-100	C	Ottawa County Highway Garage, Oak Harbor, 6.0 miles S of Station
T-111	C	Toussaint North Road, 8.3 miles WSW of Station
T-112	I	Thompson Road, 1.5 miles SSW of Station
T-113	QC	Quality Control Site
T-114	QC	Quality Control Site
T-115	QC	Quality Control Site
T-116	QC	Quality Control Site
T-117	QC	Quality Control Site
T-118	QC	Quality Control Site
T-119	QC	Quality Control Site
T-120	QC	Quality Control Site
T-121	I	State Route 19, 2.0 miles W of Station
T-122	I	Duff Washa and Humphrey Road, 1.7 miles W of Station
T-123	I	Zetzer Road, 1.6 miles WSW of Station
T-124	C	Church and Walnut Street, Oak Harbor, 6.5 miles SSW of Station
T-125	I	Behlman and Bier Roads, 4.4 miles SSW of Station
T-126	I	Camp Perry Western and Toussaint South Road, 3.7 miles S of Station
T-127	I	Camp Perry Western and Rymers Road, 4.0 miles SSE of Station

Table 16: Thermoluminescent Dosimeter Locations (continued)

Sample Location Number	Type of Location	Location Description
T-128	I	Erie Industrial Park, Port Clinton Road, 4.0 miles SE of Station
T-142	I	Site Boundary, 0.8 miles SSE of Station
T-150	I	Humphrey and Hollywood Roads, 2.1 miles NW of Station
T-151	I	State Route 2 and Humphrey Road, 1.8 miles WNW of Station
T-153	I	Leutz Road, 1.4 miles SSW of Station
T-154	I	State Route 2, 0.7 miles SW of Station
T-155	C	Fourth and Madison Streets, Port Clinton, 9.5 miles SE of Station
T-200	QC	Quality Control Site
T-201	I	Sand Beach, 1.1 miles NNW of Station
T-202	I	Sand Beach, 0.8 miles NNW of Station
T-203	I	Sand Beach, 0.7 miles N of Station
T-204	I	Sand Beach, 0.7 miles N of Station
T-205	I	Sand Beach, 0.5 miles NNE of Station
T-206	I	Site Boundary, 0.6 miles NW of Station
T-207	I	Site Boundary, 0.5 miles N of Station
T-208	I	Site Boundary, 0.5 miles NNE of Station.

I = Indicator

C = Control

QC = Quality Control

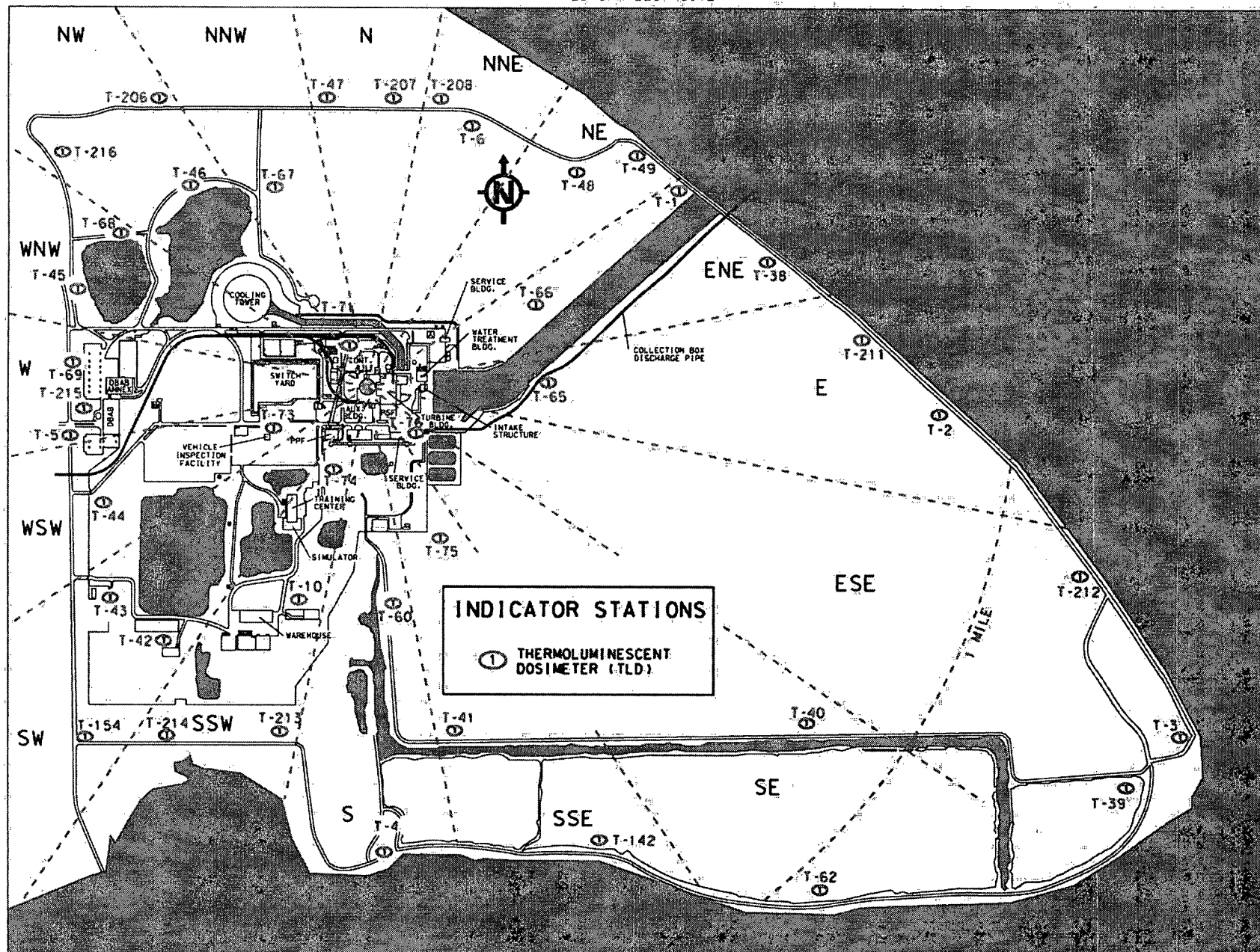
Table 16: Thermoluminescent Dosimeter Locations (continued)

<b>Sample Location Number</b>	<b>Type of Location</b>	<b>Location Description</b>
T-211	I	Site boundary, 0.79 miles E of Station
T-212	I	Site boundary, 1.2 miles ESE of Station
T-213	I	Site boundary, 0.6 miles SSW of Station
T-214	I	Site boundary, 0.7 miles SW of Station
T-215	I	Site boundary, 0.5 miles W of Station
T-216	I	Site boundary, 0.7 miles NW of station
T-217	I	Salem-Carroll Rd., 4.7 miles SSW of Station
T-218	I	Toussaint East Rd., 4.0 miles WSW of Station
T-219	I	Toussaint Portage Rd., 4.8 miles WSW of Station
T-220	I	Duff-Washa Rd., 4.8 miles W of Station
T-221	C	Magee Marsh, 5.1 miles WNW of Station
T-222	I	Turtle Creek Access, 3.7 miles WNW of Station
T-223	I	Lawrence Rd., 5.0 miles SE of Station
T-224	I	Erie Industrial Park, 4.4 miles SE of Station



# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

TLD SAMPLES: SITE

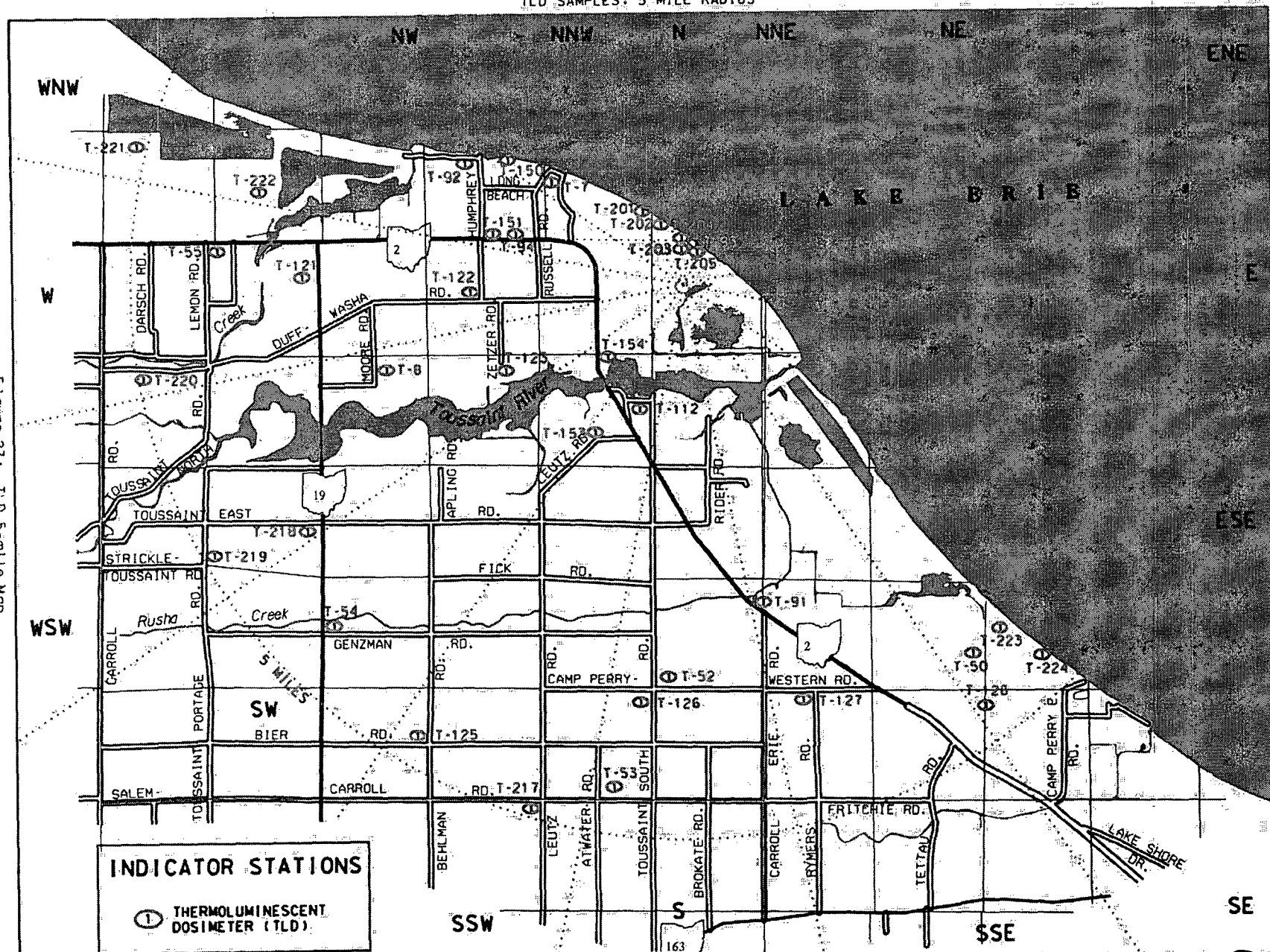


Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Figure 26: TLD Site Map

# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

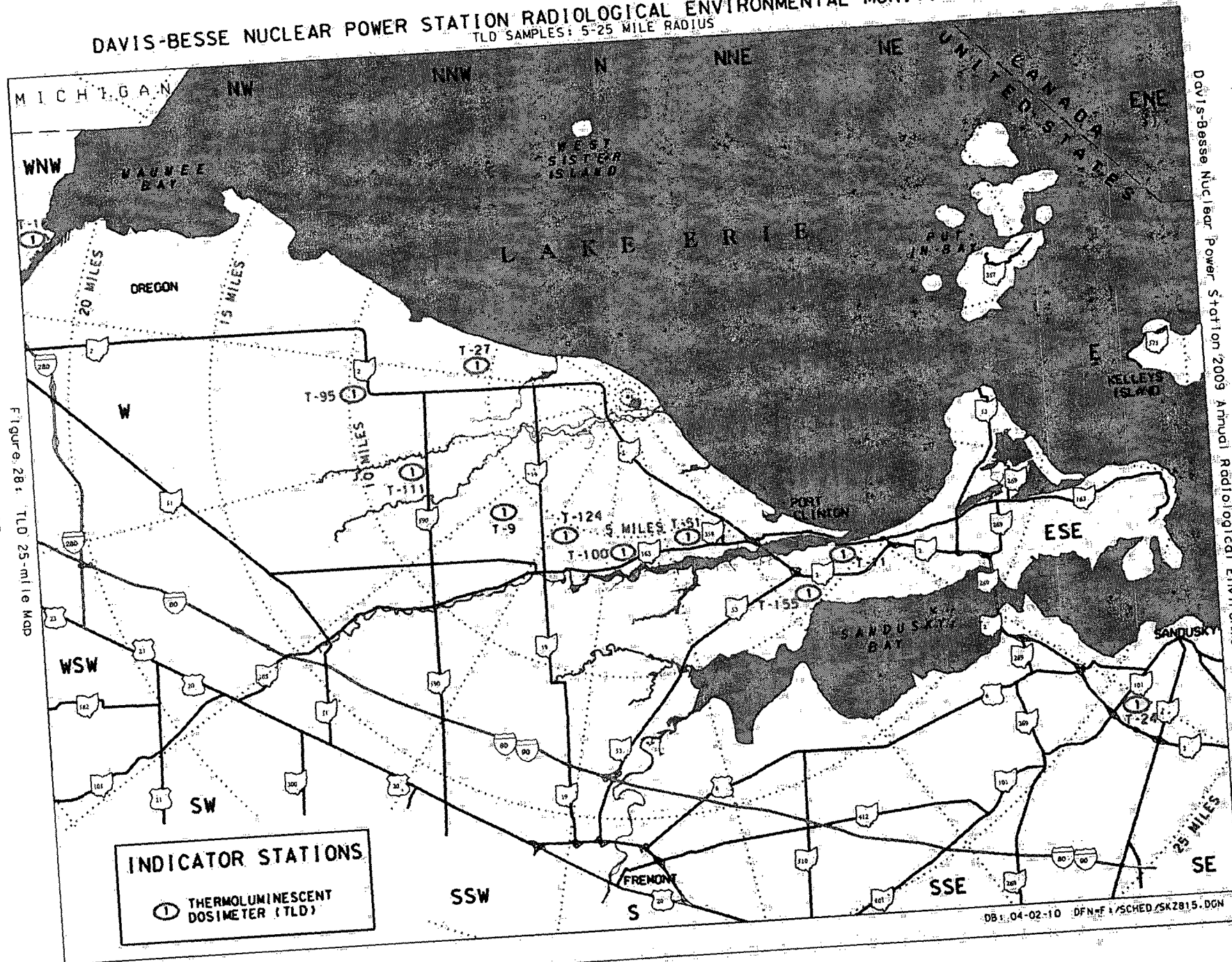
TLD SAMPLES: 5 MILE RADIUS



Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Monitoring Report

Figure 27: TLD 5-mile Map

DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM  
TLD SAMPLES: 5-25 MILE RADIUS



Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

DB: 04-02-10 DFN-F: /SCHED/SKZB15.DGN

## Conclusion

The Radiological Environmental Monitoring Program at Davis-Besse is conducted to determine the radiological impact, if any, of the Station's operation on the environment. Radionuclide concentrations measured at indicator locations were compared with concentrations measured at control locations in previous operational studies and in the pre-operational surveillance program. These comparisons indicate normal concentrations of radioactivity in nearly all environmental samples collected in 2009. Davis-Besse's operation in 2009 indicated no adverse radiological impact on the residents and environment surrounding the station. The results of the sample analyses performed during the period of January through December 2009 are summarized in Appendix D of this report.

## References

1. "Cesium-137 from the Environment to Man: Metabolism and Dose," Report No. 52, National Council on Radiation Protection and Measurement, Washington, D.C. (January 1977).
2. "Environmental Radiation Measurements," Report No. 50, National Council on Radiation Protection and Measurement, Washington, D.C. (December 1976).
3. "Exposure of the Population in the United States and Canada from Natural Background Radiation," Report No. 94, National Council on Radiation Protection and Measurement, Washington, D.C. (December 1987).
4. "A Guide for Environmental Radiological Surveillance at U.S. Department of Energy Installations," DOE/EP-0023, Department of Energy, Washington, D.C. (July 1981).
5. "Ionizing Radiation Exposure of the Population of the United States," Report No. 93, National Council on Radiation Protection and Measurement, Washington, D.C. (September 1987).
6. "Natural Background Radiation in the United States," Report No. 45, National Council on Radiation Protection and Measurement, Washington, D.C. (November 1975).
7. "Numerical Guides for Design Objectives and Limiting Conditions for Operation to meet the Criterion 'As Low As Reasonably Achievable' for Radioactive Material in Light Water Cooled Nuclear Power Reactor Effluents," Code of Federal Regulations, Title 10 Energy, Part 50 "Domestic Licensing of Production and Utilization Facilities," Appendix I (1988).
8. "Performance, Testing and Procedural Specifications for Thermoluminescent Dosimetry," American National Standards Institute, Inc., ANSI-N45-1975, New York, New York (1975).
9. "Public Radiation Exposure from Nuclear Power Generation in the United States," Report No. 92, National Council on Radiation Protection and Measurement, Washington, D.C. (December 1987).

10. "Radiological Assessment: Predicting the Transport, Bioaccumulation and Uptake by Man of Radionuclides Released to the Environment," Report No. 76, National Council on Radiation Protection and Measurement, Washington, D.C. (March 1984).
11. Regulatory Guide 4.1, "Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants," US NRC (April 1975).
12. Regulatory Guide 4.13, "Performance, Testing, and Procedural Specifications for Thermoluminescent Dosimetry: Environmental Applications," US NRC (July 1977).
13. Regulatory Guide 4.15, "Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment," US NRC (February 1979).
14. Regulatory Guide 0475, "Radiological Environmental Monitoring by NRC Licensees for Routine Operations of Nuclear Facilities," US NRC (September 1978).
15. "Standards for Protection Against Radiation," Code of Federal Regulations, Title 10, Energy, Part 20 (1993).
16. Teledyne Isotopes Midwest Laboratory, "Operational Radiological Monitoring for the Davis-Besse Nuclear Power Station Unit No.1, Oak Harbor, OH," Annual Report, Parts I and II (1977 through 1990).
17. Teledyne Isotopes Midwest Laboratory, "Final Monthly Progress Report to Toledo Edison Company", (1991-1999).
18. Environmental, Inc. Midwest Laboratory, "Final Report to FirstEnergy Corporation", (2000-2009)
19. Teledyne Isotopes Midwest Laboratory, "Pre-operational Environmental Radiological Monitoring for the Davis-Besse Power Station Unit No. 1", Oak Harbor, OH (1972-1977).
20. Toledo Edison Company, "Davis-Besse: Nuclear Energy for Northern Ohio."
21. Toledo Edison Company, Davis-Besse Nuclear Power Station, Unit No. 1, Radiological Effluent Technical Specifications", Volume 1, Appendix A to License No. NPF-3.
22. Toledo Edison Company, "Final Environmental Statement -Related to the Construction of Davis-Besse Nuclear Power Station," Docket #50-346 (1987).
23. Toledo Edison Company, "Performance Specifications for Radiological Environmental Monitoring Program," S-72N.
24. Davis-Besse Nuclear Power Station, "Radiological Environmental Monitoring Program," DB-CN-00015.



25. Davis-Besse Nuclear Power Station, "Radiological Environmental Monitoring Quarterly, Semiannual, and Annual Sampling", DB-CN-03004.
26. Davis-Besse Nuclear Power Station, "Radiological Monitoring Weekly, Semimonthly, and Monthly Sampling," DB-CN-03005.
27. Davis-Besse Nuclear Power Station, "REMP Enhancement Sampling", DB-CN-10101.
28. Toledo Edison Company, "Updated Safety Analysis for the Offsite Radiological Monitoring Program", USAR 11.6, Revision 14, (1992).
29. Davis-Besse Nuclear Power Station, "Annual Radiological Environmental Operating Report Preparation and Submittal", DB-CN-00014.
30. Davis-Besse Nuclear Power Station, "Preparation of Radioactive Effluent Release Report", DB-CN-00012.
31. Davis-Besse Nuclear Power Station, "Offsite Dose Calculation Manual".
32. "Tritium in the Environment", Report No. 62, National Council on Radiation Protection and Measurements, Washington, D.C. (March 1979).
33. NEI 07-07, "Industry Ground Water Protection Initiative – Final Guidance Document", August, 2007.
34. "Groundwater Monitoring Well Installation & Monitoring Report Davis-Besse Nuclear Power Station Oak Harbor, Ohio", Environmental Resources Management, March 18, 2008.

# Radioactive Effluent Release Report

## January 1 through December 31, 2009

---

### Protection Standards

Soon after the discovery of x-rays in 1895 by Wilhelm Roentgen, the potential hazards of ionizing radiation were recognized and efforts were made to establish radiation protection standards. The primary source of recommendations for radiation protection standards within the United States is the National Council on Radiation Protection and Measurement (NCRP). Many of these recommendations have been given legislative authority by being published in the Code of Federal Regulations by the Nuclear Regulatory Commission.

The main objective in the control of radiation is to ensure that any dose is kept not only within regulatory limits, but kept as low as reasonably achievable (ALARA). The ALARA principle applies to reducing radiation dose both to the individual working at Davis-Besse and to the general public. "Reasonably achievable" means that exposure reduction is based on sound economic decisions and operating practices. By practicing ALARA, Davis-Besse minimizes health risk and environmental detriment and ensures that doses are maintained well below regulatory limits.

### Sources of Radioactivity Released

During the normal operation of a nuclear power station, most of the fission products are retained within the fuel and fuel cladding. However, small amounts of radioactive fission products and trace amounts of the component and structure surfaces, which have been activated, are present in the primary coolant water. The three types of radioactive material released are noble gases, iodine and particulates, and tritium.

The noble gas fission products in the primary coolant are given off as a gas when the coolant is depressurized. These gases are then collected by a system designed for gas collection and stored for radioactive decay prior to release.

Small releases of radioactivity in liquids may occur from valves, piping or equipment associated with the primary coolant system. These liquids are collected through a series of floor and equipment drains and sumps. All liquids of this nature are monitored and processed, if necessary, prior to release.

#### Noble Gas

Some of the fission products released in airborne effluents are radioactive isotopes of noble gases, such as Xenon (Xe) and Krypton (Kr). Noble gases are biologically and chemically inert. They do not concentrate in humans or other organisms. They contribute to human radiation dose by being an external source of radiation exposure to the body. Xe-133 and Xe-135, with half-lives of approximately five days and nine hours, respectively, are the major radioactive noble gases released. They are readily dispersed in the atmosphere.

## Iodine and Particulates

Annual releases of radioisotopes of Iodine, and those particulates with half-lives greater than 8 days, in gaseous and liquid effluents are small. Factors such as their high chemical reactivity and solubility in water, combined with the high efficiency of gaseous and liquid processing systems, minimize their discharge. The predominant radioiodine released is Iodine-131 with a half-life of approximately eight days. The main contribution of radioactive Iodine to human dose is to the thyroid gland, where the body concentrates Iodine.

The principal radioactive particulates released are fission products (e.g., Cesium-134 and Cesium-137) and activation products (e.g., Cobalt-58 and Cobalt-60). Radioactive Cesium and Cobalt contribute to internal radiation exposure of tissues such as muscle, liver, and the intestines. These particulates are also a source of external radiation exposure if deposited on the ground.

## Tritium

Tritium, a radioactive isotope of Hydrogen, is the predominant radionuclide in liquid effluents. It is also present in gaseous effluents. Tritium is produced in the reactor coolant as a result of neutron interaction with deuterium (also a Hydrogen isotope) present in the water and with the Boron in the primary coolant. When tritium, in the form of water or water vapor, is ingested or inhaled it is dispersed throughout the body until eliminated.

## Processing and Monitoring

Effluents are strictly controlled to ensure radioactivity released to the environment is minimal and does not exceed regulatory limits. Effluent control includes the operation of monitoring systems, in-plant and environmental sampling and analysis programs, quality assurance programs for effluent and environmental programs, and procedures covering all aspects of effluent and environmental monitoring.

The radioactive waste treatment systems at Davis-Besse are designed to collect and process the liquid and gaseous wastes that contain radioactivity. For example, the Waste Gas Decay Tanks allow radioactivity in gases to decay prior to release via the Station Vent.

Radioactivity monitoring systems are used to ensure that all releases are below regulatory limits. These instruments provide a continuous indication of the radioactivity present. Each instrument is equipped with alarms and indicators in the control room. The alarm setpoints are low enough to ensure the limits will not be exceeded. If a monitor alarms, a release from a tank is automatically stopped.

All wastes are sampled prior to release and analyzed to identify the specific concentrations of radionuclides. Sampling and analysis provides a more sensitive and precise method of determining effluent composition than can be accomplished with monitoring instruments.

A meteorological tower is located in the southwest sector of the Station which is linked to computers that record its data. Coupled with the effluent release data, the meteorological data are used to calculate the dose to the public.



Beyond the plant, devices maintained in conjunction with the Radiological Environmental Monitoring Program continuously sample the air in the surrounding environment. Frequent samples of other environmental media, such as water and vegetation, are taken to determine if buildup of deposited radioactive material has occurred in the area.

## Exposure Pathways

Radiological exposure pathways define the methods by which people may become exposed to radioactive material. The major pathways of concern are those which could cause the highest calculated radiation dose. These projected pathways are determined from the type and amount of radioactive material released, the environmental transport mechanism, and the use of the environment. The environmental transport mechanism includes consideration of physical factors, such as the hydrological (water) and meteorological (weather) characteristics of the area. An annual average of the water flow, wind speed, and wind direction are used to evaluate how the radionuclides will be distributed in an area for gaseous or liquid releases. An important factor in evaluating the exposure pathways is the use of the environment. Many factors are considered such as dietary intake of residents, recreational use of the area, and the locations of homes and farms in the area.

The external and internal exposure pathways considered are shown in Figure 29. The release of radioactive gaseous effluents involves pathways such as external whole body exposure, deposition of radioactive material on plants, deposition on soil, inhalation by animals destined for human consumption, and inhalation by humans. The release of radioactive material in liquid effluents involves pathways such as drinking water, fish, and direct exposure from the lake at the shoreline while swimming.

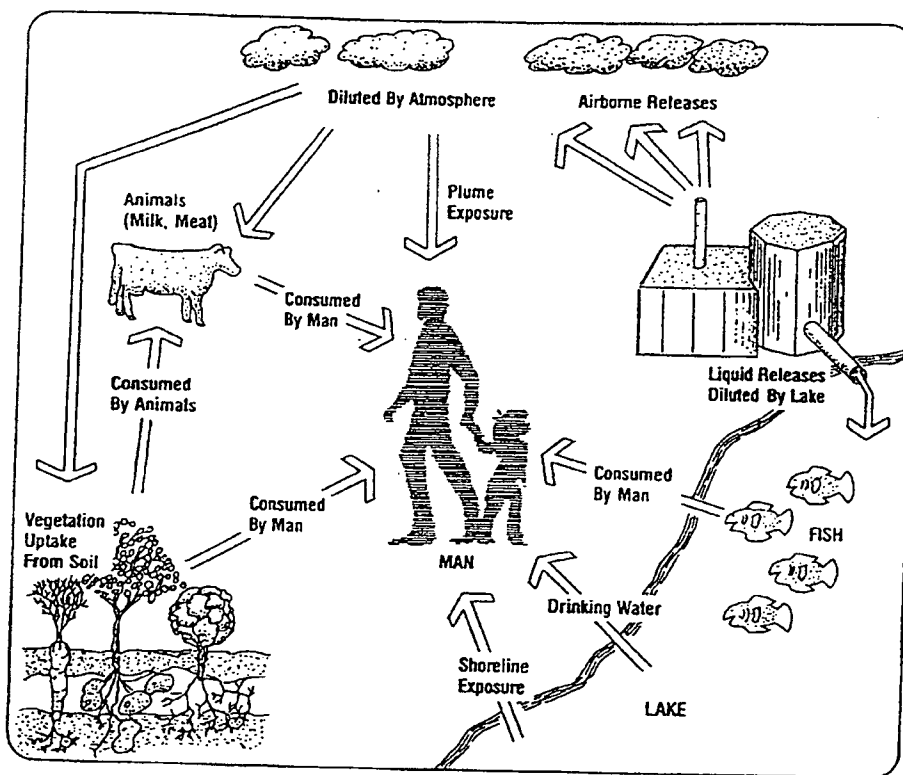


Figure 29: The exposure pathways shown here are monitored through the Radiological Environmental Monitoring Program (REMP) and are considered when calculating doses to the public.

Although radionuclides can reach humans by many different pathways, some result in more dose than others. The critical pathway is the exposure route that will provide, for a specific radionuclide, the greatest dose to a population, or to a specific group of the population called the critical group. The critical group may vary depending on the radionuclides involved, the age and diet of the group, or other cultural factors. The dose may be delivered to the whole body or to a specific organ. The organ receiving the greatest fraction of the dose is called the critical organ.

## Dose Assessment

Dose is the energy deposited by radiation in an exposed individual. Whole body exposure to radiation involves the exposure of all organs. Most background exposures are of this form. Both radioactive and non-radioactive elements can enter the body through inhalation or ingestion. When they do, they are usually not evenly distributed. For example, Iodine concentrates in the thyroid gland, Cesium collects in muscle and liver tissue, and Strontium collects in the bone.

The total dose to organs from a given radionuclide depends on the amount of radioactive material present in the organ and the length of time that the radionuclide remains there. Some radionuclides remain for short times due to their rapid radioactive decay and/or elimination rate from the body. Other radionuclides may remain in the body for longer periods of time.

The dose to the general public in the area surrounding Davis-Besse is calculated for each liquid or gaseous release. The dose due to radioactive material released in gaseous effluents is calculated using factors such as the amount of radioactive material released, the concentration beyond the site boundary, the average weather conditions at the time of the release, the locations of exposure pathways (cow milk, goat milk, vegetable gardens and residences), and usage factors (inhalation, food consumption). The dose due to radioactive material released in liquid effluents is calculated by using factors such as the total volume of the liquid released, the total volume of dilution water (near field dilution), and usage factors, such as water and fish consumption, and shoreline and swimming factors. These calculations produce a conservative estimation of the dose.

## Results

The Radioactive Effluent Release Report is a detailed listing of radioactivity released from the Davis-Besse Nuclear Power Station during the period from January 1 through December 31, 2009.

- Summation of the quantities of radioactive material released in gaseous and liquid effluents (Tables 17-23)
- Summation of the quantities of radioactive material contained in solid waste packaged and shipped for offsite disposal at federally approved sites (Table 24)
- A listing of all radioactive effluent monitoring instrumentation required by the Offsite Dose Calculation Manual, but which were inoperable for more than 30 days

During this reporting period, the estimated maximum individual offsite dose due to radioactivity released in effluent was:

### Liquid Effluents:

- 7.81E-03 mrem, maximum individual whole body
- 9.67E-03 mrem, maximum significant organ dose (liver)

### Gaseous Effluents:

#### Noble Gas:

- 1.77E-03 mrem, whole body
- 1.17E-02 mrem, skin

#### Iodine - 131, Tritium, and Particulates with Half-lives greater than 8 Days:

- 1.43E-03 mrem, whole body dose
- 1.66E-03 mrem, significant organ dose (thyroid)

These doses are a small fraction of the limits set by the NRC in the Davis-Besse ODCM.

Additional normal release pathways from the secondary system exist. For gaseous effluents, these pathways include the Auxiliary Feed Pump Turbines exhaust, the main steam safety valve system and the atmospheric vent valve system, steam packing exhaust and main feed water. For liquid effluents, the additional pathways include the Turbine Building drains via the settling basins. Releases via these pathways are included in the normal release tables in this report.

## Regulatory Limits

### Gaseous Effluents

In accordance with Offsite Dose Calculation Manual, dose rates due to radioactivity released in gaseous effluents from the site to areas at and beyond the site boundary shall be limited to the following:

Noble gases:

- Released at a rate equal to or less than 500 mrem TEDE per year.
- Released at a rate such that the total dose to the skin will be less than or equal to 3000 mrem in a year.

Iodine-131, tritium, and all radionuclides in particulate form with half-lives greater than 8 days:

- Released at a rate such that the total dose to any organ will be less than or equal to 1500 mrem in a year.

In accordance with 10CFR50, Appendix I, Sec. IIB. 1, air dose due to radioactivity released in gaseous effluents to areas at and beyond the site boundary shall be limited to the following:

- Less than or equal to 10 mrad total for gamma radiation and less than or equal to 20 mrad total for beta radiation in any calendar year.

In accordance with 10CFR50, Appendix I, Sec. IIC, dose to a member of the public from Iodine-131, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released to areas at and beyond the site boundary shall be limited to the following:

- Less than or equal to 15 total mrem to any organ in any calendar year.

### Liquid Effluents

In accordance with 10CFR50, Appendix I, Sec IIA, the dose or dose commitment to a member of the public from radioactivity in liquid effluents released to unrestricted areas shall be limited to accumulated doses of:

- Less than or equal to 3 mrem to the total body and less than or equal to 10 mrem to any organ in any calendar year.

## Effluent Concentration Limits

The Effluent Concentration Limits (ECs) for gaseous and liquid effluents at and beyond the site boundary are listed in 10CFR20, Appendix B, Table II, Columns 1 and 2, with the most restrictive EC being used in all cases. For dissolved and entrained gases in liquids, the EC of  $2.0\text{E-}04$  uCi/ml is applied. This EC is based on the Xe-135 DAC of  $1\text{E-}05$  uCi/ml of air (submersion dose) converted to an equivalent concentration in water as discussed in the International Commission on Radiological Protection (ICRP), Publication 2.

## Average Energy

The Davis-Besse ODCM limits the dose equivalent rates due to the release of fission and activation products to less than or equal to 500 mrem per year to the total body and less than or equal to 3000 mrem per year to the skin. Therefore, the average beta and gamma energies (E) for gaseous effluents as described in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants" are not applicable.

## Measurements of Total Activity

### Fission and Activation Gases:

These gases, excluding tritium, are collected in Marinelli beakers specially modified for gas sampling, in steel flasks, or in glass vials, and are counted on a Germanium detector for principal gamma emitters. Radionuclides detected are quantified via gamma spectroscopy.

Tritium gas is collected using a bubbler apparatus and counted by liquid scintillation.

### Iodine

Iodine is collected on a charcoal cartridge filter and counted on a germanium detector. Specific quantification of each iodine radionuclide is performed using gamma spectroscopy.

### Particulates

Particulates are collected on filter paper and counted on a Germanium detector. Specific quantification of each radionuclide present on the filter paper is performed by using gamma spectroscopy.

### Liquid Effluents

Liquid effluents are collected in a Marinelli beaker and counted on a germanium detector. Quantification of each gamma-emitting radionuclide present in liquid samples is via gamma spectroscopy. Tritium in the liquid effluent is quantified by counting an aliquot of a composite sample in a liquid scintillation counting system.

## Batch Releases

### Liquid from 1/1/09 through 12/31/09

1. Number of batch releases: 49
2. Total time period for the batch releases: 87.7 hours
3. Maximum time period for a batch release: 275 minutes
4. Minimum time period for a batch release: 87 minutes
5. Average time period for a batch release: 107.5 minutes

### Gaseous from 1/1/09 through 12/31/09

1. Number of batch releases: 15
2. Total time period for the batch releases: 1,086 hours
3. Maximum time period for a batch release: 835 hours
4. Minimum time period for a batch release: 40 minutes
5. Average time period for batch release: 993 minutes

## Abnormal Releases

There were no abnormal gaseous releases of radioactivity during 2009.

There were no liquid abnormal releases of radioactivity during 2009.

## Percent of ODCM Release Limits

The following table presents the ODCM annual dose limits and the associated offsite dose to the public, in percent of limits, for January 1, 2009 through December 31, 2009.

	SPECIFICATION	ANNUAL DOSE	LIMIT	PERCENT OF LIMIT
Report Period: January 1, 2009- December 31, 2009 (gaseous)				
	Noble gases (gamma)	1.61E-03 mrad	10 mrad	1.61E-02
	Noble gases (beta)	1.17E-02 mrad	20 mrad	5.85E-02
	I-131, tritium and particulates	1.66E-03 mrem	15 mrem	1.11E-02
Report Period: January 1, 2009 - December 31, 2009 (liquid)				
	Total body	7.81E-03 mrem	3 mrem	2.60E-01
	Organ	9.67E-03 mrem	10 mrem	9.67E-02

## Sources of Input Data

- Water Usage: Survey of Water Treatment Plants (DSR-95-00347)
- 0-50 mile meat, milk, vegetable production, and population data was taken from 1982 Annual Environmental Operating Report entitled, "Evaluation of Compliance with Appendix I to 10CFR50: Updated Population, Agricultural, Meat - Animal, and Milk Production Data Tables for 1982". This evaluation was based on the 1980 Census, the Agricultural Ministry of Ontario 1980 report entitled "Agricultural Statistics and Livestock Marketing Account", the Agricultural Ministry of Ontario report entitled "Agricultural Statistics for Ontario, Publication 21, 1980", the Michigan Department of Agriculture report entitled "Michigan Agricultural Statistics, 1981", and the Ohio Crop Reporting Service report entitled "Ohio Agricultural Statistics, 1981".
- Gaseous and liquid source terms: Tables 17 through 21 of this report.
- Location of the nearest individuals and pathways by sector within 5 miles, see Land Use Census Section of the report.
- Population of the 50-mile Radius of Davis-Besse (DSR-95-00398).

## Dose to Public Due to Activities Inside the Site Boundary

In accordance with ODCM Section 7.2, the Radioactive Effluent Release Report includes an assessment of radiation doses from radioactivity released in liquid and gaseous effluents to members of the public from activities inside the site boundary.

The Wellness Center, Pavilion, Training Center pond and the intake forebay/canal area located inside DBNPS Owner Controlled Area are accessible to employees and their families. The Pavilion may be accessible to the public for certain social activities. The Training Center pond allows employees and their families to fish on site under a "catch-and-release" program; therefore the fish pathway is not considered applicable. Considering the frequency and duration of the visits, the resultant dose would be a small fraction of the calculated maximum site boundary dose. For purposes of assessing the dose to members of the public in accordance with ODCM Section 7.2, the following exposure assumptions are used:

- Exposure time for maximally-exposed visitors is 250 hours (1 hr/day, 5 day/ week, 50 wk/yr)
- Annual average meteorological dispersion (conservative, default use of maximum site boundary dispersion).
- For direct "shine" from the Independent Spent Fuel Storage Installation (ISFSI), default use of the maximum dose rate for a completed (full) ISFSI, and a distance of 950 feet.

The equations in the ODCM may be used for calculating the potential dose to a member of the public for activities inside the site boundary. Based on these assumptions, this dose would be at least a factor of 35 less than the maximum site boundary air dose, as calculated in the ODCM. Nowhere onsite are areas accessible to the public where exposure to liquid effluents could occur. Therefore, the modeling of the ODCM conservatively estimates the maximum potential dose to members of the public.

### Inoperable Radioactive Effluent Monitoring Equipment

There was one required radioactive effluent monitor that was inoperable for more than 30 days during the reporting period. RE 1770B was inoperable between 11/13/09 and 2/3/10. ODCM requirements were fulfilled during this time, since RE 1770A was in service.

### Changes to the Offsite Dose Calculation Manual (ODCM) and the Process Control Procedure (PCP)

There was one change to the ODCM and no changes to the PCP during this reporting period.

### Borated Water Storage Tank Radionuclide Concentrations

The Borated Water Storage Tank's (BWST) sum of limiting fractions of radionuclides concentration, (a unitless number between 0 and 1) did not exceed the ODCM Section 2.2.4 limit of 1 during 2009.



Table 17  
Gaseous Effluents - Summation of All Releases

Type	Unit	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009	Est. Total % Error
<b><u>Fission and Activation Gases</u></b>						
Total Release	Ci	4.10E-01	1.02E+02	6.13E+01	1.46E+01	2.5E+01
Average Release Rate for Period	µCi/sec	3.08E-02	1.29E+01	5.23E+00	1.89E+00	
Percent of ODCM Limits	See Supplemental Information in ODCM Release Limits Section 3.3, Gaseous Effluent Setpoint Determination					
<b><u>Iodines</u></b>						
Total Iodines (I-131)	Ci	4.20E-06	1.10E-04	1.14E-05	3.40E-05	2.5E+01
Average Release Rate for Period	µCi/sec	3.16E-07	1.38E-05	9.74E-07	4.40E-06	
Percent of ODCM Limits	See Supplemental Information in ODCM Release Limits Section 3.3, Gaseous Effluent Setpoint Determination					
<b><u>Particulates</u></b>						
Particulates with half-lives greater than 8 days	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.5E+01
Average Release Rate for Period	µCi/sec	0.00E+00	0.00E+00	0.00E+0	0.00E+00	
Percent of ODCM Limits	See Supplemental Information in ODCM Release Limits Section 3.3, Gaseous Effluent Setpoint Determination					
<b><u>Gross Alpha Activity</u></b>	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	2.5E+01
<b><u>Tritium</u></b>						
Total Release	Ci	1.40E+01	1.39E+01	1.09E+01	1.02E+01	2.5E+01
Average Release Rate for Period	µCi/sec	1.05E+00	1.75E+00	9.31E-01	1.32E+00	
Percent of ODCM Limits	See Supplemental Information in ODCM Release Limits Section 3.3, Gaseous Effluent Setpoint Determination					

Note: The average release rate is taken over the entire quarter, not over the time period of the releases.

**Table 18**  
**Gaseous Effluents - Ground Level Releases - Batch Mode<sup>a</sup>**

Nuclide	Unit	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009
<b><u>Fission Gases</u></b>					
	Ci				
Kr-85		<LLD	<LLD	<LLD	<LLD
Kr-85m		<LLD	<LLD	<LLD	<LLD
Kr-87		<LLD	<LLD	<LLD	<LLD
Kr-88		<LLD	<LLD	<LLD	<LLD
Xe-133		<LLD	<LLD	<LLD	<LLD
Xe-135		<LLD	<LLD	<LLD	<LLD
Xe-135m		<LLD	<LLD	<LLD	<LLD
Xe-138		<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		N/A	N/A	N/A	N/A
<b><u>Iodines</u></b>					
	Ci				
I-131		<LLD	<LLD	<LLD	<LLD
I-133		<LLD	<LLD	<LLD	<LLD
I-135		<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		N/A	N/A	N/A	N/A
<b><u>Particulates and Tritium</u></b>					
	Ci				
H-3		1.52E-02	1.05E-02	1.46E-02	1.01E-02
Sr-89		<LLD	<LLD	<LLD	<LLD
Sr-90		<LLD	<LLD	<LLD	<LLD
Cs-134		<LLD	<LLD	<LLD	<LLD
Cs-137		<LLD	<LLD	<LLD	<LLD
Ba-La-140		<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		1.52E-02	1.05E-02	1.46E-02	1.01E-02

Table 18 (Continued)  
Gaseous Effluents - Ground Level Releases  
Continuous Mode<sup>b</sup>

Nuclide	Unit	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009
<b><u>Fission Gases</u></b>	Ci				
Kr-85		<LLD	<LLD	<LLD	<LLD
Kr-85m		<LLD	<LLD	<LLD	<LLD
Kr-87		<LLD	<LLD	<LLD	<LLD
Kr-88		<LLD	<LLD	<LLD	<LLD
Xe-133		<LLD	<LLD	<LLD	<LLD
Xe-135		<LLD	<LLD	<LLD	<LLD
Xe-135m	0	<LLD	<LLD	<LLD	<LLD
Xe-138		<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		N/A	N/A	N/A	N/A
<b><u>Iodines</u></b>	Ci				
I-131		<LLD	<LLD	<LLD	<LLD
I-133		<LLD	<LLD	<LLD	<LLD
I-135		<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		N/A	N/A	N/A	N/A
<b><u>Particulates and Tritium</u></b>	Ci				
H-3		5.16E-02	2.93E-02	4.15E-02	3.64E-02
Sr-89		<LLD	<LLD	<LLD	<LLD
Sr-90		<LLD	<LLD	<LLD	<LLD
Cs-134		<LLD	<LLD	<LLD	<LLD
Cs-137		<LLD	<LLD	<LLD	<LLD
Ba-La-140		<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		5.16E-02	2.93E-02	4.15E-02	3.64E-02

Table 18 (Continued)  
Gaseous Effluents - Ground Level Releases  
LLDs for Continuous<sup>b</sup> and Batch<sup>a</sup> Mode

Ar-41	<1.4E-08	μCi/ml
Kr-85	<2.1E-06	μCi/ml
Kr-85m	<7.3E-09	μCi/ml
Kr-87	<2.5E-08	μCi/ml
Kr-88	<2.8E-08	μCi/ml
Xe-133	<2.1E-08	μCi/ml
Xe-133m	<5.0E-08	μCi/ml
Xe-135	<6.2E-09	μCi/ml
Xe-135m	<2.1E-07	μCi/ml
Xe-138	<7.7E-07	μCi/ml
I-131	<1.1E-14	μCi/ml
I-133	<1.7E-14	μCi/ml
I-135	<7.7E-14	μCi/ml
Cs-134	<1.7E-14	μCi/ml
Cs-137	<1.4E-14	μCi/ml
Ba-140	<4.8E-14	μCi/ml
La-140	<2.4E-14	μCi/ml
Sr-89	<9.16E-16	μCi/ml
Sr-90	<3.10E-16	μCi/ml
Mn-54	<1.9E-14	μCi/ml
Fe-59	<4.0E-14	μCi/ml
Co-58	<2.0E-14	μCi/ml
Co-60	<1.9E-14	μCi/ml
Zn-65	<3.1E-14	μCi/ml
Mo-99	<1.0E-13	μCi/ml
Ce-141	<1.7E-14	μCi/ml

a Auxiliary Feed Pump Turbine Exhaust, Main Steam Safety Valves, and Auxiliary Boiler Outage Release are listed as batch releases.

b Atmospheric Vent Valve weepage and Steam Packing Exhaust are continuous releases.

**Table 19**  
**Gaseous Effluents - Mixed Mode Releases**  
**Batch Mode**

Nuclide	Unit	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009
<b>Fission Gases</b>					
Ar-41	Ci	<LLD	5.85E-02	6.93E-01	6.67E-03
Kr-85	Ci	<LLD	6.10E+01	4.00E+01	3.87E-01
Kr-85m	Ci	<LLD	<LLD	6.06E-04	<LLD
Kr-87	Ci	<LLD	<LLD	<LLD	<LLD
Kr-88	Ci	<LLD	<LLD	<LLD	<LLD
Xe-131m	Ci	<LLD	1.08E+00	7.29E-01	7.74E-03
Xe-133	Ci	<LLD	3.17E+01	1.98E+01	1.64E-01
Xe-133m	Ci	<LLD	1.35E-01	8.80E-02	7.65E-04
Xe-135	Ci	<LLD	4.65E-02	5.15E-02	5.57E-04
Xe-135m	Ci	<LLD	<LLD	<LLD	<LLD
Xe-138	Ci	<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		0.00E+00	9.40E+01	6.13E+01	5.67E-01
<b>*Iodines</b>					
I-131	Ci	<LLD	<LLD	<LLD	<LLD
I-133	Ci	<LLD	<LLD	<LLD	<LLD
I-135	Ci	<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00
<b>*Particulates &amp; Tritium</b>					
H-3	Ci	0.00E+00	1.09E+00	2.11E+00	1.01E-02
Sr-89	Ci	<LLD	<LLD	<LLD	<LLD
Sr-90	Ci	<LLD	<LLD	<LLD	<LLD
Cs-134	Ci	<LLD	<LLD	<LLD	<LLD
Cs-137	Ci	<LLD	<LLD	<LLD	<LLD
Ba-La-140	Ci	<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>	Ci	0.00E+00	1.09E+00	2.11E+00	1.01E-02

\* Release of iodines and particulates are quantified in Mixed Mode Releases, Continuous Mode (Unit Station Vent)

Table 19 (Continued)  
Gaseous Effluents - Mixed Mode Releases  
Continuous Mode

Nuclide	Unit	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009
<b>Fission Gases</b>					
Kr-85	Ci	<LLD	<LLD	<LLD	<LLD
Kr-85m	Ci	<LLD	<LLD	<LLD	<LLD
Kr-87	Ci	<LLD	<LLD	<LLD	<LLD
Kr-88	Ci	<LLD	<LLD	<LLD	<LLD
Xe-133	Ci	4.10E-01	8.20E+00	<LLD	1.40E+01
Xe-133m	Ci	<LLD	<LLD	<LLD	<LLD
Xe-135	Ci	<LLD	<LLD	<LLD	<LLD
Xe-135m	Ci	<LLD	<LLD	<LLD	<LLD
Xe-138	Ci	<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		4.10E-01	8.20E+00	0.00E+00	1.40E+01
<b>Iodines</b>					
I-131	Ci	8.91E-07	9.80E-05	8.45E-06	1.25E-05
I-132	Ci	<LLD	<LLD	<LLD	<LLD
I-133	Ci	3.31E-06	1.18E-05	2.97E-06	2.15E-05
I-135	Ci	<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		4.20E-06	1.10E-04	1.14E-05	3.40E-05
<b>Particulates and Tritium</b>					
Co-58	Ci	<LLD	<LLD	<LLD	<LLD
Sr-89	Ci	<LLD	<LLD	<LLD	<LLD
Sr-90	Ci	<LLD	<LLD	<LLD	<LLD
Cs-134	Ci	<LLD	<LLD	<LLD	<LLD
Cs-137	Ci	<LLD	<LLD	<LLD	<LLD
Ba-La-140	Ci	<LLD	<LLD	<LLD	<LLD
H-3	Ci	1.40E+01	1.28E+01	8.82E+00	1.01E+01
<b>Total for Period:</b>		1.40E+01	1.28E+01	8.82E+00	1.01E+01

Table 19 (Continued)  
LLDs for Gaseous Effluents - Mixed Mode Releases

Continuous Mode <sup>a</sup>			Batch Mode <sup>a</sup>		
Kr-85	<2.1E-06	μCi/ml	Ar-41	<2.3E-06	μCi/ml
Kr-85m	<7.3E-09	μCi/ml	Kr-85	<3.6E-04	μCi/ml
Kr-87	<2.5E-08	μCi/ml	Kr-85m	<1.4E-06	μCi/ml
Kr-88	<2.8E-08	μCi/ml	Kr-87	<4.4E-06	μCi/ml
Xe-133	<2.1E-08	μCi/ml	Kr-88	<4.7E-06	μCi/ml
Xe-133m	<5.9E-08	μCi/ml	Xe-133	<2.8E-06	uCi/ml
Xe-135	<6.2E-09	μCi/ml	Xe-133m	<8.3E-06	μCi/ml
Xe-135m	<2.1E-07	μCi/ml	Xe-135	<4.8E-06	μCi/ml
Xe-138	<7.7E-07	μCi/ml	Xe-135m	<2.1E-05	μCi/ml
I-131	<1.1E-14	μCi/ml	Xe-138	<4.9E-05	μCi/ml
I-133	<2.2E-14	μCi/ml	I-131	<1.3E-06	μCi/ml
I-135	<7.7E-14	μCi/ml	I-133	<1.2E-06	μCi/ml
Cs-134	<1.7E-14	μCi/ml	I-135	<6.1E-06	μCi/ml
Cs-137	<1.4E-14	μCi/ml	Sr-89	<9.1E-16	μCi/ml
Ba-140	<4.8E-14	μCi/ml	Sr-90	<3.1E-16	μCi/ml
La-140	<2.4E-15	μCi/ml	Cs-134	<1.3E-06	μCi/ml
Sr-89	<9.1E-16	μCi/ml	Cs-137	<2.0E-06	μCi/ml
Sr-90	<3.1E-16	μCi/ml	Ba-140	<4.3E-06	uCi/ml
Mn-54	<1.9E-14	μCi/ml	La-140	<1.8E-06	μCi/ml
Fe-59	<4.0E-14	μCi/ml			
Co-58	<2.0E-14	μCi/ml			
Co-60	<1.9E-14	μCi/ml			
Zn-65	<3.1E-14	μCi/ml			
Mo-99	<1.0E-13	μCi/ml			
Ce-141	<1.7E-14	μCi/ml			

a These radionuclides were not identified in every quarter in concentrations above the lower limit of detection (LLD).

Table 20  
Liquid Effluents - Summation of All Releases

Type	Unit	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009	Est. Total % Error
<b><u>Fission and Activation Products</u></b>						
Total Release (without Tritium, Gases, Alpha)	Ci	1.69E-03	2.62E-03	1.39E-03	7.03E-03	2.0E+01
Average Diluted Concentration During Period <sup>a</sup>	μCi/ml	1.36E-10	2.07E-10	1.03E-10	6.29E-10	
Percent of ODCM Limits	%	See Supplemental information in ODCM Section 2.3, Release Limits				
Percent of 10CFR20 Limit	%	1.49E-03	1.89E-03	1.90E-03	3.11E-03	
<b><u>Tritium</u></b>						
Total Release	Ci	1.67E+02	1.34E+02	2.34E+02	1.17E+02	2.0E+01
Average Diluted Concentration During Period <sup>a</sup>	μCi/ml	1.34E-05	1.06E-05	1.73E-05	1.05E-05	
Percent of 10CFR20 Limit	%	1.34E+00	1.06E+00	1.73E+00	1.05E+00	
<b><u>Dissolved and Entrained Gases</u></b>						
Total Release	Ci	5.65E-03	6.85E-02	6.41E-02	4.86E-02	2.0E+01
Average Diluted Concentration During Period <sup>a</sup>	μCi/ml	4.52E-10	5.40E-09	4.73E-09	4.35E-09	
Percent of 10CFR20 Limit	%	2.26E-04	2.70E-03	2.36E-03	2.18E-03	
<b><u>Gross Alpha</u></b>						
Total Release	Ci	0.00E+00	0.00E+00	1.27E-03	2.10E-03	2.0E+01
<b><u>Volume of Waste Released (prior to dilution)</u></b>						
Batch	liter	4.13E+05	3.79E+05	4.38E+05	3.68E+05	2.0E+01
Continuous	liter	8.47E+07	7.43E+07	5.42E+07	8.01E+07	2.0E+01
<b><u>Volume of Dilution Water</u></b>						
Batch	liter	1.25E+08	1.20E+08	1.42E+08	1.11E+08	2.0E+01
Continuous	liter	1.23E+10	1.25E+10	1.34E+10	1.10E+10	2.0E+01
<b><u>Total Volume of Water Released</u></b>	liter	1.25E+10	1.27E+10	1.36E+10	1.12E+10	

<sup>a</sup> Tritium and alpha may be found in both continuous and batch releases. Average diluted concentrations are based on total volume of water released during the quarter. Fission and Activation products and Dissolved and Entrained Gases are normally only detected in batch releases.



Table 21  
Liquid Effluents - Nuclides Released  
in Batch Releases

Nuclide	Unit	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009
<b>Fission and Activation Products</b>					
Cr-51	Ci	<LLD	<LLD	<LLD	<LLD
Mn-54	Ci	<LLD	<LLD	<LLD	<LLD
Fe-55 <sup>b</sup>	Ci	3.96E-04	<LLD	<LLD	4.05E-03
Co-57	Ci	5.95E-06	1.50E-05	7.00E-06	2.82E-05
Co-58	Ci	1.36E-04	4.92E-04	3.55E-04	3.48E-04
Fe-59	Ci	<LLD	<LLD	<LLD	<LLD
Co-60	Ci	6.66E-05	1.25E-04	8.60E-05	2.83E-04
Ni-63	Ci	7.43E-04	1.44E-03	7.01E-04	2.13E-03
Zn-65	Ci	<LLD	<LLD	<LLD	<LLD
Se-75	Ci	<LLD	<LLD	<LLD	<LLD
Sr-89 <sup>b</sup>	Ci	<LLD	<LLD	<LLD	<LLD
Sr-90 <sup>b</sup>	Ci	<LLD	<LLD	<LLD	<LLD
Sr-92	Ci	<LLD	<LLD	<LLD	<LLD
Nb-95	Ci	<LLD	<LLD	2.28E-06	<LLD
Zr-95	Ci	<LLD	<LLD	<LLD	<LLD
Zr-97	Ci	<LLD	2.40E-06	<LLD	<LLD
Mo-99	Ci	<LLD	<LLD	<LLD	<LLD
Tc-99m	Ci	<LLD	<LLD	<LLD	<LLD
Ru-103	Ci	<LLD	<LLD	<LLD	<LLD
Ru-106	Ci	<LLD	<LLD	<LLD	<LLD
Ag-110m	Ci	1.11E-04	6.44E-05	2.42E-05	1.20E-06
Sb-122	Ci	<LLD	<LLD	<LLD	<LLD
Sb-124	Ci	<LLD	<LLD	<LLD	<LLD
Sb-125	Ci	1.20E-04	3.50E-04	2.33E-05	1.41E-05
I-131	Ci	<LLD	3.54E-06	<LLD	<LLD
I-132	Ci	<LLD	<LLD	<LLD	<LLD
Te-132	Ci	<LLD	<LLD	<LLD	<LLD
Cs-134	Ci	5.96E-05	4.18E-05	5.61E-05	4.80E-05
Cs-137	Ci	5.74E-05	8.63E-05	1.28E-04	1.16E-04
Ba-140	Ci	<LLD	<LLD	<LLD	<LLD
La-140	Ci	<LLD	<LLD	<LLD	<LLD
Ce-141	Ci	<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>	Ci	1.69E-03	2.62E-03	1.38E-03	7.02E-03

Table 21 (continued)  
Liquid Effluents - Nuclides Released

In Batch Releases		1st Qtr	2nd Qtr	3rd Qtr	4th Qtr
Nuclide	Unit	2009	2009	2009	2009
H-3	Ci	1.67E+02	1.34E+02	2.34E+02	1.17E+02
<b>Dissolved and Entrained Gases</b>					
Kr-85	Ci	5.12E-03	2.91E-02	6.10E-02	3.38E-02
Xe-131m	Ci	<LLD	2.14E-03	1.34E-04	5.16E-04
Xe-133	Ci	5.36E-04	3.72E-02	2.98E-03	1.43E-02
Xe-133m	Ci	<LLD	2.45E-05	<LLD	3.32E-05
Xe-135	Ci	<LLD	3.68E-06	<LLD	1.04E-06
<b>Total for Period:</b>	Ci	5.65E-03	6.85E-02	6.41E-02	4.86E-02

Table 21 (continued)  
Liquid Effluents – Nuclides<sup>a</sup> Released

In Continuous Releases					
Nuclide	Unit	1st Qtr 2009	2nd Qtr 2009	3rd Qtr 2009	4th Qtr 2009
<b>Fission and Activation Products</b>					
Cr-51	Ci	<LLD	<LLD	<LLD	<LLD
Mn-54	Ci	<LLD	<LLD	<LLD	<LLD
Fe-59	Ci	<LLD	<LLD	<LLD	<LLD
Co-58	Ci	<LLD	<LLD	<LLD	<LLD
Co-60	Ci	<LLD	<LLD	<LLD	<LLD
Zn-65	Ci	<LLD	<LLD	<LLD	<LLD
Sr-89 <sup>b</sup>	Ci	<LLD	<LLD	<LLD	<LLD
Sr-90 <sup>b</sup>	Ci	<LLD	<LLD	<LLD	<LLD
Nb-95	Ci	<LLD	<LLD	<LLD	<LLD
Zr-95	Ci	<LLD	<LLD	<LLD	<LLD
Mo-99	Ci	<LLD	<LLD	<LLD	<LLD
Tc-99m	Ci	<LLD	<LLD	<LLD	<LLD
I-131	Ci	<LLD	<LLD	<LLD	<LLD
Cs-134	Ci	<LLD	<LLD	6.96E-07	<LLD
Cs-137	Ci	<LLD	<LLD	8.66E-06	4.07E-06
Ba/La-140	Ci	<LLD	<LLD	<LLD	<LLD
Ce-141	Ci	<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>		0.00E+00	0.00E+00	9.36E-06	4.07E-06
<b>Tritium</b>	Ci	5.84E-01	3.68E-01	1.85E-02	2.15E-01
<b>Dissolved and Entrained Gases</b>					
Xe-133	Ci	<LLD	<LLD	<LLD	<LLD
Xe-135	Ci	<LLD	<LLD	<LLD	<LLD
<b>Total for Period:</b>	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Table 21 (continued)

Liquid Effluents – LLDs for Nuclides Released<sup>a</sup>

Cr-51	<9.3E-8	μCi/ml	Ar-41	1.68E-08	μCi/ml
Mn-54	<8.9E-09	μCi/ml	I-131	<1.4E-08	μCi/ml
Fe-55 <sup>b</sup>	<9.0E-07	μCi/ml	Xe-131m	<4.7E-07	μCi/ml
Co-57	<1.0E-08	μCi/ml	Xe-133	<3.3E-08	μCi/ml
Co-58	<1.4E-08	μCi/ml	Xe-133m	<9.4E-08	μCi/ml
Fe-59	<2.5E-08	μCi/ml	Cs-134	<1.3E-08	μCi/ml
Co-60	<1.4E-08	μCi/ml	Xe-135	<1.1E-08	μCi/ml
Zn-65	<2.3E-08	μCi/ml	Cs-137	<1.3E-08	μCi/ml
Kr-85	<3.5E-06	μCi/ml	Ba-140	<4.9E-08	μCi/ml
Sr-89 <sup>b</sup>	<4.0E-08	μCi/ml	La-140	<1.7E-08	μCi/ml
Sr-90 <sup>b</sup>	<1.7E-08	μCi/ml	Ce-141	<1.7E-08	μCi/ml
Sr-92	<2.1E-08	μCi/ml	Ce-144	<8.4E-08	μCi/ml
Zr-95	<2.1E-08	μCi/ml			
Zr-97	<1.4E-08	μCi/ml			
Nb-95	<1.5E-08	μCi/ml			
Tc-99m	<1.1E-08	μCi/ml			
Mo-99	<9.9E-08	μCi/ml			
Ru-103	<1.2E-08	μCi/ml			
Ru-106	<1.0E-07	μCi/ml			
Ag-110m	<1.2E-08	μCi/ml			
Sb-124	<9.9E-09	μCi/ml			
Sb-125	<3.5E-08	μCi/ml			

<sup>a</sup> These radionuclides were not identified every quarter in concentrations above the lower limit of detection (LLD). LLDs are applicable to both batch and continuous modes due to identical sample and analysis methods.

<sup>b</sup> Quarterly composite sample

Table 22  
Solid Waste and Irradiated Fuel Shipments

## A. SOLID WASTE SHIPPED OFFSITE FOR BURIAL OR DISPOSAL (Not irradiated fuel)

1. Type of Waste		Unit	12-month Period	Est. Total Error, %
a.	Spent resins, filter sludges, evaporator bottoms, etc.	m <sup>3</sup>	9.60E+00	2.5E+01
		Ci	9.14E-04	2.5E+01
b.	Dry compressible waste, contaminated equip., etc.	m <sup>3</sup>	2.55E+02	2.5E+01
		Ci	2.57E-02	2.5E+01
c.	Irradiated components, control rods, etc.	m <sup>3</sup>	N/A	N/A
		Ci		
d.	Others: Spent Resin Storage Tank Liquor	m <sup>3</sup>	4.08E+01	2.5E+01
		Ci	1.53E+01	2.5E+01

## 2. Estimate of major nuclide composition (by type of waste)

	Type	Percent (%)	Est. Error, %
a. Spent Resins	Cs <sup>137</sup>	97.7E+01	2.50E+01
	Cs <sup>134</sup>	2.21E+00	2.50E+01
	Co <sup>60</sup>	1.37E-01	2.50E+01
b. Dry compressible waste, contaminated equipment, etc.	Cs <sup>137</sup>	2.76E+01	2.50E+01
	Fe <sup>55</sup>	2.67E+01	2.50E+01
	Ni <sup>63</sup>	2.36E+01	2.50E+01
	Co <sup>58</sup>	1.26E+01	2.50E+01
	Co <sup>60</sup>	5.60E+00	2.50E+01
	Cs <sup>134</sup>	2.40E+00	2.50E+01
	Ce <sup>144</sup>	7.25E-01	2.50E+01
	H <sup>3</sup>	5.84E-01	2.50E+01
c. None	Sb <sup>125</sup>	2.50E-01	2.50E+01

Table 22  
Solid Waste and Irradiated Fuel Shipments

	Type	Percent (%)	Est. Error, %
d. Others: Spent Resin Storage Tank Liquor	H <sup>3</sup>	9.00E+01	2.50E+01
	Ni <sup>63</sup>	6.21E+00	2.50E+01
	Co <sup>60</sup>	9.67E-01	2.50E+01
	C <sup>14</sup>	8.00E-01	2.50E+01
	Co <sup>58</sup>	7.26E-01	2.50E+01
	Ag <sup>110m</sup>	5.71E-01	2.50E+01
	Fe <sup>55</sup>	3.86E-01	2.50E+01
	Cs <sup>137</sup>	9.33E-02	2.50E+01
	Cs <sup>134</sup>	7.57E-02	2.50E+01
	Sr <sup>90</sup>	4.15E-02	2.50E+01
	Ce <sup>144</sup>	3.50E-02	2.50E+01
	Pu <sup>241</sup>	2.44E-02	2.50E+01
	Ru <sup>106</sup>	1.16E-02	2.50E+01
	Ni <sup>59</sup>	7.31E-03	2.50E+01
	Pu <sup>238</sup>	1.43E-03	2.50E+01
	Cm <sup>243</sup>	6.85E-04	2.50E+01
	Am <sup>241</sup>	4.19E-04	2.50E+01
	Pu <sup>239</sup>	3.21E-04	2.50E+01
	Cm <sup>242</sup>	1.96E-04	2.50E+01
	Tc <sup>99</sup>	3.29E-06	2.50E+01

---

Table 22 (continued)  
Solid Waste and Irradiated Fuel Shipments

---

**3. Solid Waste Disposition**

Number of Shipments:	5
Mode of Transportation:	Truck
Destination:	Energy Solutions, Oak Ridge, TN for processing and disposal at Energy Solutions of Utah.
Type of Container (Container Volume):	Metal boxes (assorted sizes, 3.12-36.2 m <sup>3</sup> )
Volume shipped for processing	254.9 m <sup>3</sup>
Number of Shipments:	1
Mode of Transportation:	Truck
Destination:	Energy Solutions, Kingston, TN for processing and disposal at Energy Solutions of Utah
Type of Container (Container Volume):	Metal liners (assorted sizes, 4.8 m <sup>3</sup> )
Volume shipped for processing	9.6 m <sup>3</sup>

**B. IRRADIATED FUEL SHIPMENTS**

There were no shipments of irradiated fuel.

## Onsite Groundwater Monitoring

Davis-Besse began sampling wells near the plant in 2007 in order to evaluate whether there have been any inadvertent releases of radioactivity to groundwater that could potentially affect local water supplies. Groundwater samples were collected from 16 newly-drilled wells surrounding the plant and certain selected construction-era wells in the vicinity of a 2008 underground pipe leak. Tritium values in these wells ranged from <149 to 2,352 pCi/liter in 2009, with two wells showing activity above the 2,000 pCi/l courtesy notification limit. No other nuclides were detected in any sample. There is no indication that the contaminated groundwater has moved offsite. These wells are not used for drinking water purposes, and the tritium concentrations found were all below the 30,000 pCi/liter EPA limit for non-drinking water sources. Tritium results from wells sampled in 2009 are listed in Table 23 below:

**Table 23. Groundwater Monitoring Wells Sampled in 2009**

Well Designation	Sample Date	Tritium (pCi/L)	Well Designation	Sample Date	Tritium (pCi/L)
MW-100A	4/8/09	225	MW-100A	10/5/09	207
MW-100B	4/8/09	<158	MW-100B	10/5/09	169/213*
MW-100C	4/8/09	<158	MW-100C	10/6/09	<149
MW-101A	4/9/09	220	MW-101A	10/8/09	250
MW-101B	4/9/09	192	MW-101B	10/8/09	297
MW-101C	4/9/09	<158	MW-101C	10/8/09	<149
MW-102A	4/14/09	484	MW-102A	10/6/09	593
MW-102B	4/14/09	508	MW-102B	10/6/09	365
MW-102C	4/14/09	<158	MW-102C	10/6/09	<149
MW-103A	4/13/09	455	MW-103A	10/12/09	375
MW-103B	4/13/09	475	MW-103B	10/12/09	439
MW-103C	4/13/09	192	MW-103C	10/12/09	<149
MW-104A	4/15/09	400	MW-104A	10/7/09	322
MW-104B	4/15/09	<158	MW-104B	10/7/09	<149
MW-104C	4/15/09	<158	MW-104C	10/7/09	<149
MW-105A	4/20/09	1077	MW-105A	10/13/09	2285
MW-12S	4/23/09	1634/1690*	MW-18S	10/13/09	332
MW-12D	4/23/09	519	MW-34S	10/13/09	1276
MW-31S	4/20/09	1680			
MW-31D	4/20/09	<182			
MW-32S	4/21/09	1577			
MW-32D	4/21/09	702			
MW-33S	4/22/09	851			
MW-33D	4/22/09	1175			
MW-34S	4/22/09	2352**			
MW-34D	4/23/09	875			

\* Duplicate samples

\*\*Resample results 1998 pCi/l



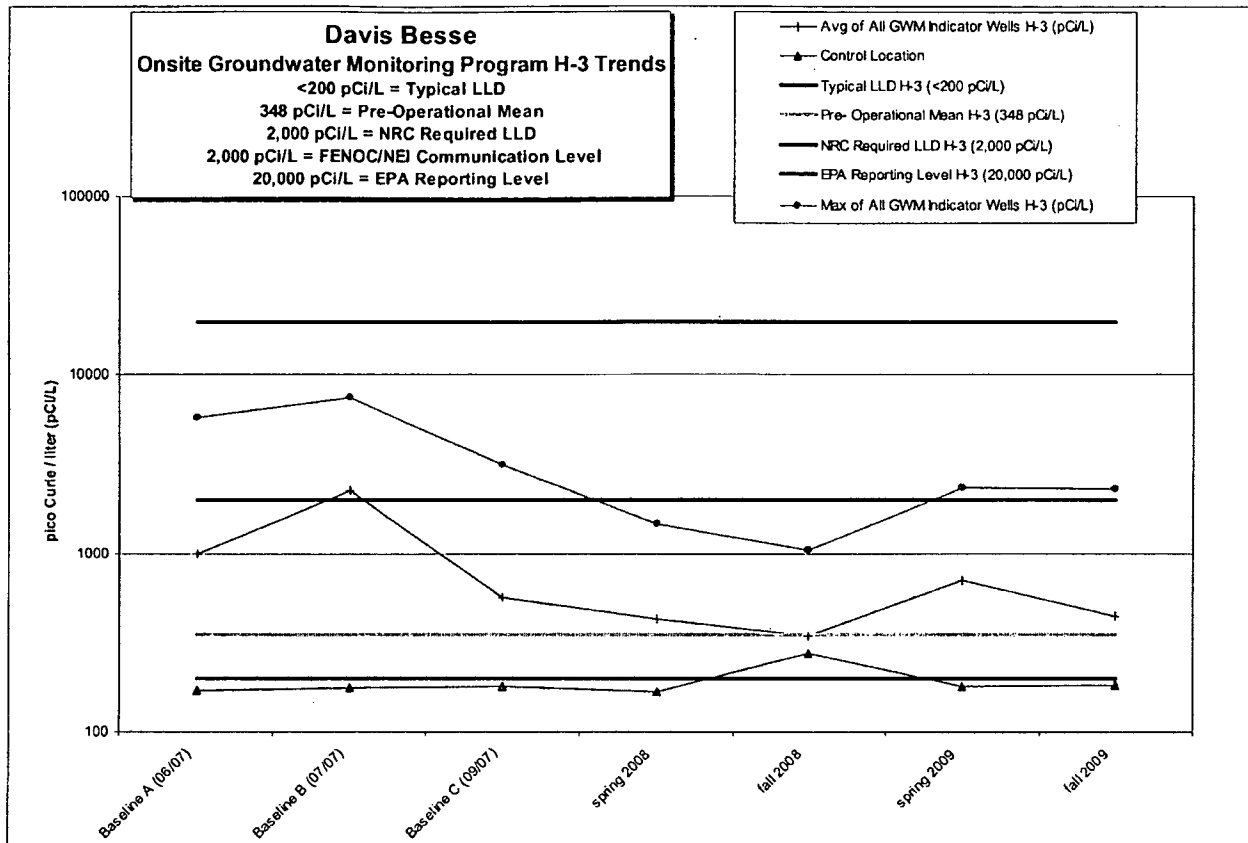


Figure 30. Davis-Besse Groundwater Monitoring through 2009

### Summary of Onsite Spills (>100 gallons) and Notifications

**Spring Groundwater Sampling:** Monitoring well MW-34S was above the 2,000 pCi/l tritium courtesy notification level during the spring groundwater sample collection. The tritium concentration in pre-construction well was 2,352 pCi/l, and is believed to have been caused by a leaking underground pipe which was repaired in December of 2008. No gamma activity was present in any of the samples. Courtesy notifications were made to the State of Ohio, Lucas and Ottawa Counties on June 10, 2009. A resample of this well was 1,998 pCi/l tritium.

**Fall Groundwater Sampling:** Courtesy notifications were made to the State of Ohio, Lucas and Ottawa County officials on December 29, 2009 after groundwater monitoring well, MW-105A, showed tritium results of 2,285 pCi/liter. This tritium activity, formerly believed to have been caused by the underground pipe which was repaired in December 2008, is under active investigation at the time of this writing. No gamma activity was present in any of the samples. No hard-to-detect radionuclides (Sr-89, Sr-90, Fe-55, Ni-63) were present in MW-105A.

### Summary of Items Added to Decommissioning Files per 10CFR50.75(g)

Results of MW-34S (spring) and MW-105A (fall) samples were captured in Davis-Besse's 10CFR50(g) decommissioning file for 2009.

Table 24

Doses Due to Gaseous Releases  
for January through December 2009

**Maximum Individual Dose Due to I-131, H-3 and Particulates with Half-Lives Greater than 8 days.**

Whole Body Dose	1.43E-03 mrem
Significant Organ Dose (thyroid)	1.66E-03 mrem

**Maximum Individual Dose Due to Noble Gas**

Whole Body Dose	1.77E-03 mrem
Skin Dose	1.17E-02 mrem

**Population Dose Due to I-131, H-3 and Particulates with Half-Lives Greater than 8 days.**

Total Integrated Population Dose	2.53E-03 person-rem
Average Dose to Individual in Population	1.16E-06 mrem

**Population Dose Due to Noble Gas**

Total Integrated Population Dose	2.20E-03 person-rem
Average Dose to Individual in Population	1.01E-06 mrem

---

Table 25  
Doses Due to Liquid Releases  
for January through December 2009

---

Maximum Individual Whole Body Dose	7.81E-03 mrem
Maximum Individual Significant Organ Dose (LIVER)	9.67E-03 mrem
Population Dose	
Total Integrated Population Dose	7.40E-01 person-rem
Average Dose to Individual	3.39E-04 mrem

Table 26

Annual Dose to The Most Exposed (from all pathways) Member of the Public 2009

	ANNUAL DOSE (mrem)	40CFR190 LIMIT (mrem)	PERCENT OF LIMIT
<b>Whole Body Dose*</b>			
Noble Gas	1.77E-03		
Iodine, Tritium, Particulates	1.43E-03		
Liquid	7.81E-03		
Total Whole Body Dose	1.10E-02	25	4.40E-02
<b>Thyroid Dose</b>			
Iodine, Tritium, Particulates	4.85E-03	75	6.47E-03
<b>Skin Dose</b>			
Noble Gas	1.17E-02	25	4.67E-02
<b>Significant Organ Dose (liver)</b>	1.11E-02	25	4.44E-02

#### Meteorological Data

Meteorological data, stored on a compact disk for January through December 31, 2009, has been submitted with this document to the U. S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555.

\*Direct radiation from the facility is not distinguishable from natural background and is, therefore, not included in this compilation.

---

# Land Use Census

---

## Program Design

Each year a Land Use Census is conducted by Davis-Besse in order to update information necessary to estimate radiation dose to the general public and to determine if any modifications are necessary to the Radiological Environmental Monitoring Program (REMP). The Land Use Census is required by Title 10 of the Code of Federal Regulations, Part 50, Appendix I and Davis-Besse Nuclear Power Station Offsite Dose Calculation Manual, Section 5, Assessment of Land Use Census Data. The Land Use Census identifies gaseous pathways by which radioactive material may reach the general population around Davis-Besse. The information gathered during the Land Use Census for dose assessment and input into the REMP ensure these programs are as current as possible. The pathways of concern are listed below:

- **Inhalation Pathway** - Internal exposure as a result of breathing radionuclides carried in the air.
- **Ground Exposure Pathway** - External exposure from radionuclides deposited on the ground
- **Plume Exposure Pathway** - External exposure directly from a plume or cloud of radioactive material.
- **Vegetation Pathway** - Internal exposure as a result of eating vegetables, fruit, etc. which have a build up of deposited radioactive material or which have absorbed radionuclides through the soil.
- **Milk Pathway** - Internal exposure as a result of drinking milk, which may contain radioactive material as a result of a cow or goat grazing on a pasture contaminated by radionuclides.

## Methodology

The Land Use Census consists of recording and mapping the locations of the closest residences, dairy cattle and goats, and broad leaf vegetable gardens (greater than 500 square feet) in each meteorological sector within a five mile radius of Davis-Besse.

The surveillance portion of the 2009 Land Use Census was performed during the month of August. In order to gather as much information as possible, the locations of residences, dairy cows, dairy goats, and vegetable gardens were recorded. The residences, vegetable gardens, and milk animals are used in the dose assessment program. The gardens must be at least 500 square feet in size, with at least 20% of the vegetables being broadleaf plants (such as lettuce and cabbage).

Each residence is tabulated as being an inhalation pathway, as well as ground and plume exposure pathways. Each garden is tabulated as a vegetation pathway.

All of the locations identified are plotted on a map (based on the U.S. Geological Survey 7.5 minute series of the relevant quadrangles) which has been divided into 16 equal sectors corresponding to the 16 cardinal compass points (Figure 30). If available, the closest residence, milk animal, and vegetable garden in each sector are determined by measuring the distance from each to the Station Vent at Davis-Besse.

## Results

The following changes in the pathways were recorded in the 2009 census:

SSE Sector – a garden was added at 2,930 meters.

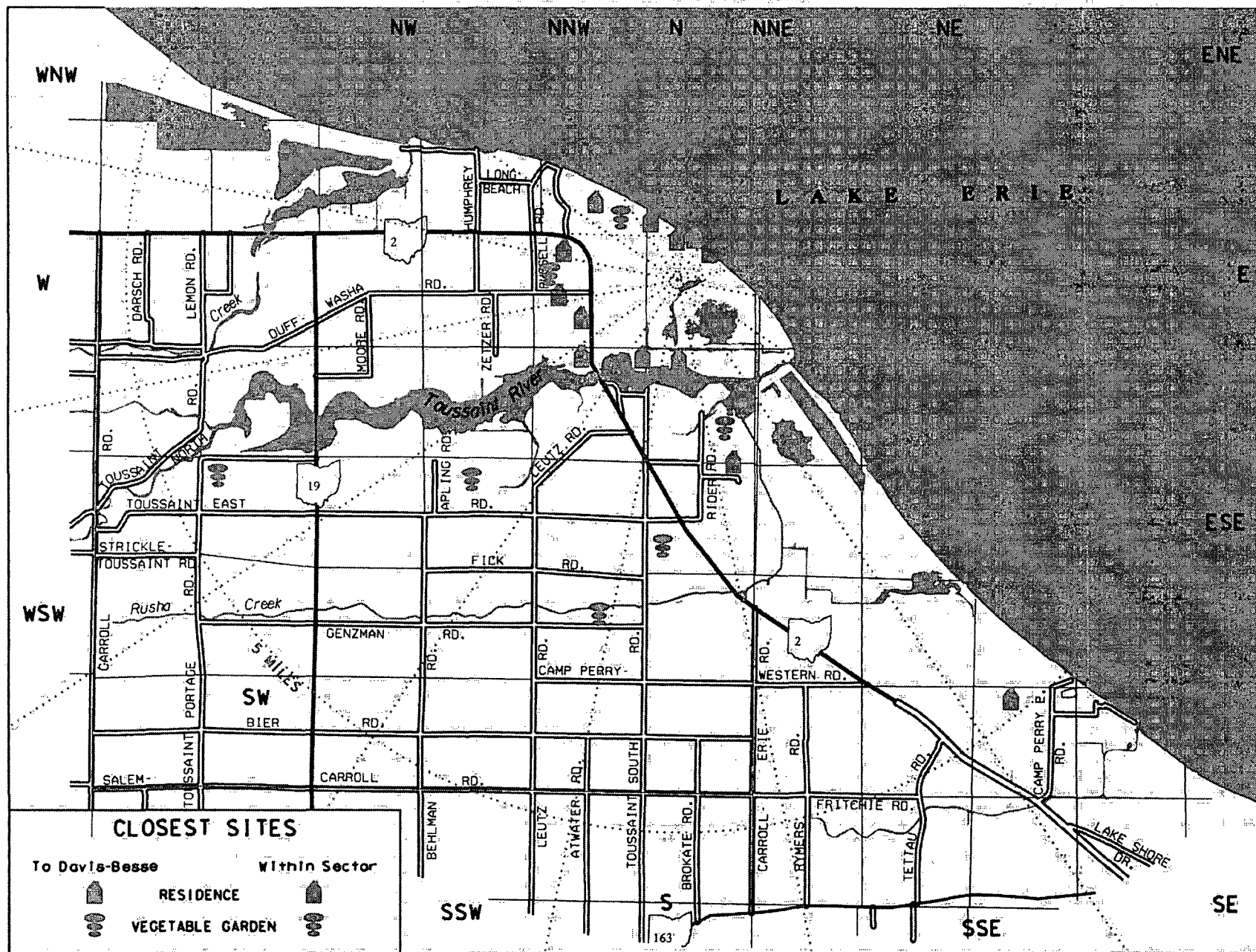
**The critical receptor is a garden in the W sector at 1,560 meters from Davis-Besse, and is unchanged from 2008.**

The detailed list in Table 28 was used to update the database of the effluent dispersion model used in dose calculations. Table 28 is divided by sectors and lists the distance (in meters) of the closest pathway in each.

Table 29 provided information on pathways, critical age group, atmospheric dispersion (X/Q) and deposition (D/Q) parameters for each sector. This information is used to update the Offsite Dose Calculation Manual (ODCM). The ODCM describes the methodology and parameters used in calculating offsite doses from radioactivity released in liquid and gaseous effluents and in calculating liquid and gaseous effluent monitoring instrumentation alarm/trip setpoints.

# DAVIS-BESSE NUCLEAR POWER STATION RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

## PRIMARY PATHWAYS WITHIN A 5 MILE RADIUS



Davis-Besse Nuclear Power Station-2009 Annual Radiological Environmental Operating Report

Figure 31: Land Use Census Map

Table 27  
Closest Exposure Pathways Present in 2009

<u>Sector</u>	<u>Distance from Station (meters)</u>	<u>Closest Pathways</u>
N	880	Inhalation Ground Exposure Plume Exposure
NNE	880	Inhalation Ground Exposure Plume Exposure
NE	900	Inhalation Ground Exposure Plume Exposure
ENE, E, ESE	N/A	Located over Lake Erie
SE	8,000	Inhalation Ground Exposure Plume Exposure
SSE*	2,930	Vegetation
SSE	1,500	Inhalation Ground Exposure Plume Exposure
S	6,035	Vegetation
S	1,090	Inhalation Ground Exposure Plume Exposure
SSW	4,280	Vegetation
SSW	980	Inhalation Ground Exposure Plume Exposure
SW	1,070	Inhalation Ground Exposure Plume Exposure

\* Changed from the 2008 Land Use Census



Table 27  
Closest Exposure Pathways Present in 2009

<u>Sector</u>	<u>Distance from Station (meters)</u>	<u>Closest Pathways</u>
SW	5,580	Vegetation
WSW	1,540	Inhalation Ground Exposure Plume Exposure
WSW	6,450	Vegetation
W	980	Inhalation Ground Exposure Plume Exposure
W	1,560	Vegetation
WNW	1,520	Inhalation Ground Exposure Plume Exposure
NW	2,250	Vegetation
NW	1,490	Inhalation Ground Exposure Plume Exposure
NNW	1,290	Inhalation Ground Exposure Plume Exposure

**Table 28**  
**Pathway Locations and Corresponding**  
**Atmospheric Dispersion (X/Q) and Deposition (D/Q)**  
**Parameters**

SECTOR	METERS	CRITICAL PATHWAY	AGE GROUP	X/Q (SEC/M <sup>3</sup> )	D/Q (M <sup>-2</sup> )
N	880	Inhalation	Child	9.15E-07	8.40E-09
NNE	880	Inhalation	Child	1.24E-06	1.44E-08
NE	900	Inhalation	Child	1.26E-06	1.58E-08
ENE*	---	---	---	---	---
E*	---	---	---	---	---
ESE*	---	---	---	---	---
SE	8,000	Inhalation	Child	3.43E-08	1.45E-10
SSE**	2,930	Vegetation	Child	6.72E-08	7.79E-10
S	6,035	Vegetation	Child	2.82E-08	1.56E-10
SSW	4,280	Vegetation	Child	3.31E-08	3.43E-10
SW	5,580	Vegetation	Child	3.59E-08	2.94E-10
WSW	6,450	Vegetation	Child	3.89E-08	2.39E-10
W	1,560	Vegetation	Child	2.94E-07	4.67E-09
WNW	1,520	Inhalation	Child	1.89E-07	2.27E-09
NW	2,250	Vegetation	Child	7.19E-08	6.04E-10
NNW	1,290	Inhalation	Child	2.31E-07	1.67E-09

\*Since these sectors are located over marsh areas and Lake Erie, no ingestion pathways are present.

\*\*Change from 2008 Land Use Census

---

# Non-Radiological Environmental Programs

---

## Meteorological Monitoring<sup>1</sup>

The Meteorological Monitoring Program at Davis-Besse is required by the Nuclear Regulatory Commission (NRC) as part of the program for evaluating the effects of routine operation of nuclear power stations on the surrounding environment. Both NRC regulations and the Davis-Besse Technical Requirements Manual provide guidelines for the Meteorological Monitoring Program. These guidelines ensure that Davis-Besse has the proper equipment, in good working order, to support the many programs utilizing meteorological data.

Meteorological observations at Davis-Besse began in October 1968. The Meteorological Monitoring Program at Davis-Besse has an extensive record of data with which to perform climate studies which are used to determine whether Davis-Besse has had any impact upon the local climate. After extensive statistical comparative research the meteorological personnel have found no impact upon local climate or short-term weather patterns.

The Meteorological Monitoring Program also provides data that can be used by many other groups and programs such as the Radiological Environmental Monitoring Program, the Emergency Preparedness Program, Site Chemistry, Plant Operations, Nuclear Security, Materials Management and Industrial Safety, as well as other plant personnel and members of the surrounding community.

The Radiological Environmental Monitoring Program uses meteorological data to aid in evaluating the radiological impact, if any, of radioactivity released in Station effluents. The meteorological data is used to evaluate radiological environmental monitoring sites to assure the program is as current as possible. The Emergency Preparedness Program uses meteorological data to calculate emergency dose scenarios for emergency drills and exercises and uses weather data to plan evacuations or station isolation during adverse weather. The Chemistry Unit uses meteorological data for chemical spill response activities, marsh management studies, and wastewater discharge flow calculations. Plant Operations uses meteorological data for cooling tower efficiency calculations, Forebay water level availability and plant work which needs certain environmental conditions to be met before work begins. Plant Security utilizes weather data in their routine planning and activities. Materials Management plans certain Plant shipments around adverse weather conditions to avoid high winds and precipitation, which would cause delays in material deliveries and safety concerns. Industrial Safety uses weather and climate data to advise personnel of unsafe working conditions due to environmental conditions, providing a safer place to work. Regulatory Affairs uses climate data for their investigation into adverse weather accidents in relation to the Plant and personnel.

1. More detailed weather information is available upon request.

## On-site Meteorological Monitoring

### System Description

At Davis-Besse there are two meteorological systems, a primary and a backup. Both are housed in separate environmentally controlled buildings with independent power supplies. Both primary and backup systems have been analyzed to be statistically identical, so that if a redundant system in one unit fails, the other system can take its place. The instrumentation of each system follows:

<u>PRIMARY</u>	<u>BACKUP</u>
100 Meter Wind Speed	100 Meter Wind Speed
75 Meter Wind Speed	75 Meter Wind Speed
10 Meter Wind Speed	10 Meter Wind Speed
100 Meter Wind Direction	100 Meter Wind Direction
75 Meter Wind Direction	75 Meter Wind Direction
10 Meter Wind Direction	10 Meter Wind Direction
100 Meter Delta Temperature	100 Meter Delta Temperature
75 Meter Delta Temperature	75 Meter Delta Temperature
10 Meter Ambient Temperature	10 Meter Ambient Temperature
10 Meter Dew Point	10 Meter Solar Incidence
Precipitation	

### Meteorological Instrumentation

The meteorological system consists of one monitoring site located at an elevation of 577 feet above mean sea level (IGLD 1955)\*. It contains a 100m free-standing tower located about 3,000 feet SSW of the Cooling Tower and a 10m auxiliary tower located 100 feet west of the 100 m tower. Both are used to gather the meteorological data. The 100m tower has primary and backup instruments for wind speed and wind direction at 100m and 75m. The 100m tower also measures differential temperature (delta Ts): 100-10m and 75-10m. The 10m tower has instruments for wind speed and wind direction. Precipitation is measured by a tipping bucket rain gauge located near the base of the 10m tower.

According to the Davis-Besse Nuclear Power Station Technical Requirements Manual, a minimum of five instruments are required to be operable at the two lower levels (75m and 10m) to measure temperature, wind speed, and wind direction. During 2009, average annual data recoveries for all required instruments were 99.99 percent. Minor losses of data occurred during routine instrument maintenance, calibration, and data validation.

Personnel at Davis-Besse inspect the meteorological site and instrumentation regularly. Data is reviewed daily to ensure that all communication pathways, data availability and data reliability are working as required. Tower instrumentation maintenance and semiannual calibrations are performed by in-house facilities and by an outside consulting firm. These instruments are wind tunnel tested to assure compliance with applicable regulations and plant specifications.

\* International Great Lakes Data - 1955

## Meteorological Data Handling and Reduction

Each meteorological system, primary and backup, have two Campbell Scientific Data-loggers (model 21XL) assigned to them. The primary system has a first data logger to communicate 900 second averages to the control room via a Digital Alpha computer system. This is a dedicated line. If a failure occurs at any point between the primary meteorological system and the control room the control room can utilize the second data logger in the primary shelter. Each data logger has its own dedicated communication link with battery backup. The backup meteorological system is designed the same as the primary; so to lose all meteorological data the primary and backup meteorological systems would have to lose all four data loggers. However, this would be difficult since each is powered by a different power supply and equipped with lightning and surge protection, plus four independent communication lines and data logger battery backup.

The data from the primary and backup meteorological systems are stored in a 30-day circular storage module with permanent storage held by the Digital Alpha computer. Data goes back to 1988 in this format and to 1968 in both digital and hardcopy formats. All data points are scrutinized every 900 seconds by meteorological statistics programs running continuously. These are then reviewed by meteorological personnel daily for validity based on actual weather conditions. A monthly review is performed using 21 NRC computer codes, which statistically analyze all data points for their availability and validity. If questionable data on the primary system can not be corroborated by the backup system, the data in question is eliminated and not incorporated into the final database. All validated data is then documented and stored on hard copy and in digital format for a permanent record of meteorological conditions.

## Meteorological Data Summaries

This section contains Tables 29-31, which summarize meteorological data collected from the on-site monitoring program in 2009.

## Wind Speed and Wind Direction

Wind sector graphics represent the frequency of wind direction by sector and the wind speed in mph by sector. This data is used by the NRC to better understand local wind patterns as they relate to defined past climatological wind patterns reported in Davis-Besse's Updated Safety Analysis Report. The maximum measured sustained wind speeds for 2009 occurred on December 30, when they were measured at 51.20 mph at the 100m level, 49.18 mph at the 75m level, and 38.59 mph at the 10m level.

Figures 32-34 give an annual sector graphic of average wind speed and percent frequency by direction measured at the three monitoring levels. Each wind sector graphic has two radial bars. The darker bar represents the percent of time the wind blew from that direction. The hatched bar represents the average wind speed from that direction. Wind direction sectors are classified using Pasquill Stabilities. Percent calms (less than or equal to 1.0 mph) are shown in the middle of the wind sector graphic.

## Ambient and Differential Temperatures

Monthly average, minimum and maximum ambient temperatures for 2009 are given in Table 30. These data are measured at the 10m level; with differential temperatures taken from 100 meter and 75 meter levels. The yearly average ambient temperature was 51.54°F. The maximum temperature was 90.80°F on August 9 with a minimum temperature of -13.68°F on January 16. Yearly average differential temperatures were -0.196F (100 meter), and -0.091F (75 meter). Maximum differential temperatures for 100 meter and 75 meter levels were 7.99F on November 14, (100 meter), and 7.99F (75 meter) on November 4. Minimum differential temperatures for 100m and 75m levels were -3.81F on October 23 (100 meter) and -3.32F on September 22 (75 meter). Differential temperatures are a measurement of atmospheric stability and used to calculate radioactive plume dispersions based on Gaussian Plume Models of continuous effluent releases.

## Dew Point Temperatures and Relative Humidity

Monthly average and extreme dew point temperatures for 2009 are provided in Table 30. These data are measured at the 10m level. The average dew point temperature was 19.89°F with a maximum dew point temperature of 48.59°F on August 9. Please note that dew point temperatures above 75°F are highly suspect and are possibly due to calm winds and high solar heating allowing the aspirated dew point processor to retain heat. The minimum dew point (dew point under 32°F is frost point) temperature was -32.74 on January 16. It is possible to have relative humidity above 100 percent, which is known as supersaturation. Conditions for supersaturation have been met a few times at Davis-Besse due to its close proximity to Lake Erie, and the evaporative pool of moisture available from such a large body of water.

## Precipitation

Monthly totals and extremes of precipitation at Davis-Besse for 2009 are given in Table 30. Total precipitation for the year was 32.41 inches. The maximum daily precipitation total was 2.18 inches on February 11. There were many days on which no precipitation was recorded. It is likely that precipitation totals recorded in colder months are somewhat less than actual due to snow/sleet blowing across the collection unit rather than accumulating in the gauge.

## Lake Breeze and Lake Level Monitoring

Lake Breeze is monitored at Davis-Besse because of its potential to cause major atmospheric/dispersion problems during an unlikely radioactive release. A lake breeze event occurs during the daytime, usually during the summer, where the land surface heats up faster than the water, and therefore reaches higher temperatures than the water. The warmer air above the land rises faster because it is less dense than the cooler air over the lake. This leads to rising air currents over the land with descending denser air over the lake. This starts a wind circulation, which draws air from the water to the land during the daytime, creating a "Lake Breeze" effect. This event could be problematic if a release were to occur because diffusion would be slow thus creating an adverse atmosphere to the surrounding site. Lake and forebay levels are monitored at Davis-Besse to observe, evaluate, predict and disseminate high or low lake level information. This data is critical in the running of the plant due to the large amounts of water needed to cool

plant components. If water levels get too low the plant operators can take measures for the safe shutdown of the plant. Since Lake Erie is the shallowest of the Great Lakes, it is not uncommon for five feet lake level fluctuation to occur within an eight to ten hour period (plus or minus). High water levels also affect the plant due to emergency transportation and evacuation pathways.

Table 29  
Summary of Meteorological Data Recovery For The

## Davis-Besse Nuclear Power Station

January 1, 2009 through December 31, 2009

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	2009
100m Wind Speed	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
100M Wind Direction	100	100	100	100	100	100	100	100	100	100	100	100	100
75M Wind Speed	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
75M Wind Direction	100	100	100	100	100	100	100	100	100	100	100	100	100
10M Wind Speed	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
10M Wind Direction	100	100	100	100	100	100	100	100	100	100	100	100	100
10M Ambient Air Temp	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
10M Dew Point Temp	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
Delta T (100M-10M)	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
Delta T (75M-10M)	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
Joint 100M Winds and Delta T (100M-10M)	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
Joint 75M Winds and Delta T (100M-10M)	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99
Joint 10M Winds and Delta T (75M-10M)	100	100	99.87	100	100	100	100	100	100	100	100	100	99.99

\*all data for individual months expressed as percent of time instrument was operable during the month, divided by the maximum number of hours in that month that the instrument could be operable. Values for annual data recoveries equals the percent of time instrument was operable during the year, divided by the number of hours in the year that the instrument was operable.



Table 30  
Summary of Meteorological Data Measured at  
Davis-Besse Nuclear Power Station  
January 1, 2009 through December 31, 2009

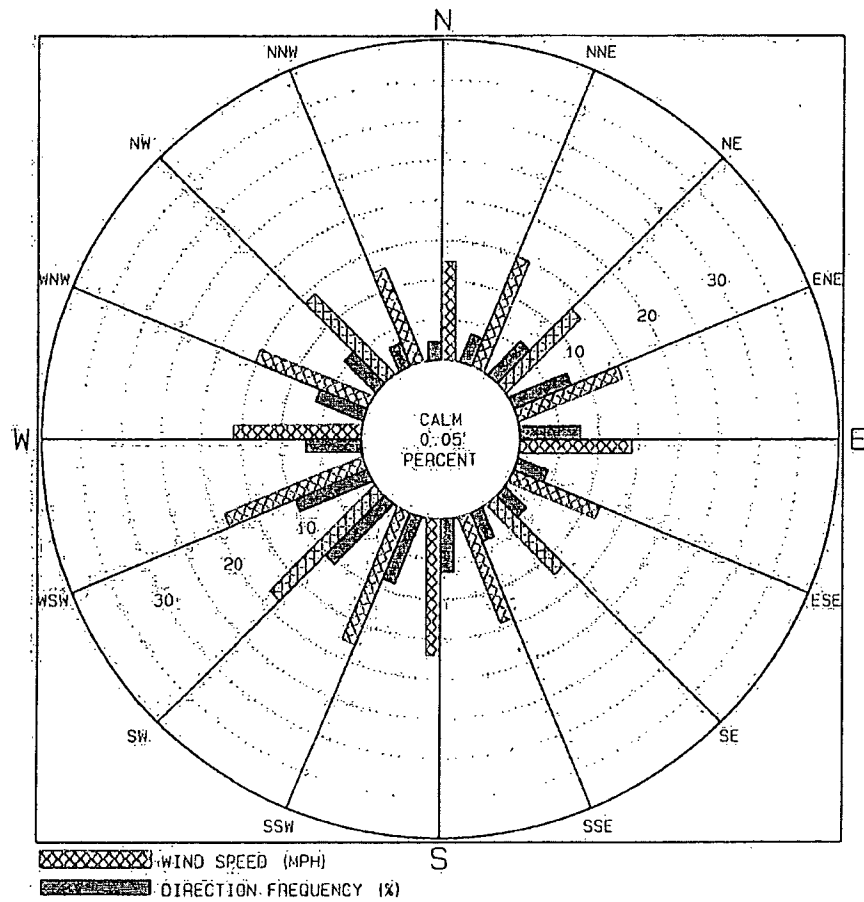
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	2009
<b>100M WIND</b>													
Max Speed (mph)	33.59	50.56	40.37	38.36	36.40	30.18	27.53	28.79	39.27	39.36	35.82	51.20	51.20
Date of Max Speed	01/31	02/12	03/09	04/02	05/09	06/25	07/25	08/20	09/28	10/31	11/17	12/09	12/09
Min Speed (mph)	1.71	0.91	2.31	1.91	1.28	1.22	2.56	1.44	1.20	2.99	0.01	2.81	0.01
Date of Min Speed	01/09	02/15	03/14	04/17	05/18	06/23	07/30	08/24	09/12	10/28	11/21	12/22	11/21
Ave Wind Speed	17.25	18.64	17.04	19.63	15.07	12.12	12.53	13.34	12.57	17.57	16.51	18.18	15.59
<b>75M WIND</b>													
Max Speed (mph)	30.48	47.05	38.00	35.59	34.01	26.49	25.82	27.31	37.62	37.45	33.10	49.18	49.18
Date of Max Speed	01/31	02/12	03/09	04/27	05/09	06/28	07/25	08/20	09/28	10/31	11/17	12/09	12/09
Min Speed (mph)	1.64	0.81	1.72	1.60	0.77	1.16	2.30	1.84	1.36	2.10	2.08	0.37	0.37
Date of Min Speed	01/06	02/15	03/14	04/09	05/11	06/23	07/31	08/12	09/12	10/05	11/21	12/17	12/17
Ave Wind Speed	15.58	16.81	15.23	17.33	13.47	10.86	11.53	11.99	11.36	15.42	14.51	16.04	13.96
<b>10M WIND</b>													
Max Speed (mph)	22.60	35.07	28.41	27.39	26.01	22.84	19.02	18.97	28.44	26.69	22.97	38.59	38.59
Date of Max Speed	01/07	02/12	03/09	04/27	05/09	06/25	07/25	08/09	09/28	10/31	11/17	12/09	12/09
Min Speed (mph)	1.20	1.00	0.78	1.25	0.04	0.25	0.35	0.54	0.96	1.52	0.62	1.51	0.04
Date of Min Speed	01/20	02/15	03/16	04/09	05/15	06/13	07/04	08/12	09/06	10/28	11/22	12/17	05/15
Ave Wind Speed	10.12	10.49	10.07	12.09	8.68	7.28	7.10	7.23	7.36	9.69	8.84	10.35	8.94

Table 30 (continued)  
Summary of Meteorological Data Measured at  
Davis-Besse Nuclear Power Station  
January 1, 2009 through December 31, 2009

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	2009
<b>10M AMBIENT TEMP</b>													
Max (F)	39.70	57.92	68.20	84.05	83.25	90.70	84.25	90.80	81.15	76.33	67.26	51.32	90.80
Date of Max	01/23	02/10	03/17	04/24	05/21	06/25	07/11	08/09	09/14	10/30	11/07	12/01	08/09
Min (F)	-13.68	-3.87	11.86	30.51	44.21	52.72	56.40	54.85	46.12	36.99	28.59	12.88	-13.68
Date of Min	01/16	02/05	03/02	04/07	05/02	06/02	07/02	08/30	09/30	10/25	11/28	12/10	01/16
Ave Temp	18.80	30.29	37.88	49.72	60.43	68.03	69.56	70.98	66.04	50.74	46.71	29.98	51.54
<b>10M DEW POINT TEMP</b>													
Mean (F)	-4.82	3.64	8.58	17.47	25.16	33.41	33.84	35.80	31.75	19.67	16.59	2.68	19.89
Max (F)	13.71	28.05	32.18	38.70	42.66	47.52	44.51	48.59	43.15	36.93	30.54	20.34	48.59
Date of Max	01/04	02/11	03/07	04/25	05/27	06/24	07/11	08/09	09/22	10/30	11/09	12/09	08/09
Min (F)	-32.74	-24.39	-13.94	3.27	10.84	19.41	26.30	23.19	16.08	8.03	3.42	-13.94	-32.74
Date of Min	01/16	02/05	03/03	04/07	05/17	06/04	07/13	08/30	09/30	10/11	11/28	12/10	01/16
<b>PRECIPITATION</b>													
Total (inches)	0.65	3.36	3.43	4.41	2.58	3.55	2.98 *	2.62	1.37	2.77	2.44	2.25	32.41
Max. in One Day	0.40	2.18	1.32	0.75	1.32	1.29	1.17 *	0.64	0.64	0.68	1.20	0.52	2.18
Date	01/23	02/11	03/10	04/14	05/14	06/25	07/11 *	08/11	09/23	10/09	11/17	12/25	02/11

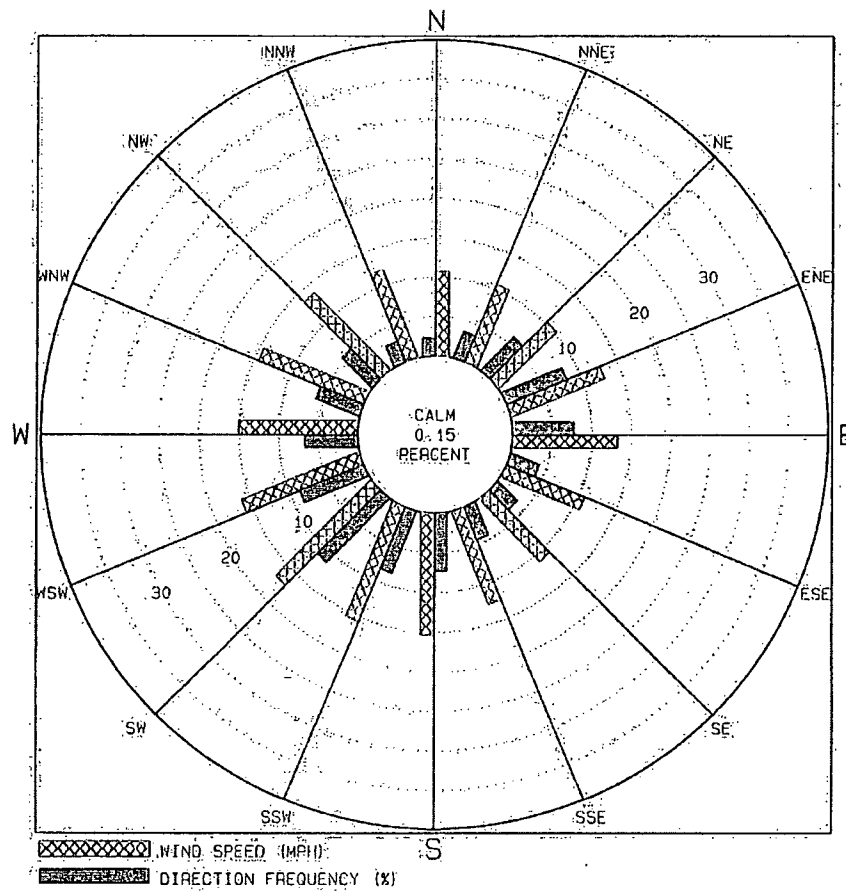
\* Data obtained from the National Weather Service

Figure 32  
Wind Rose Annual Average 100M



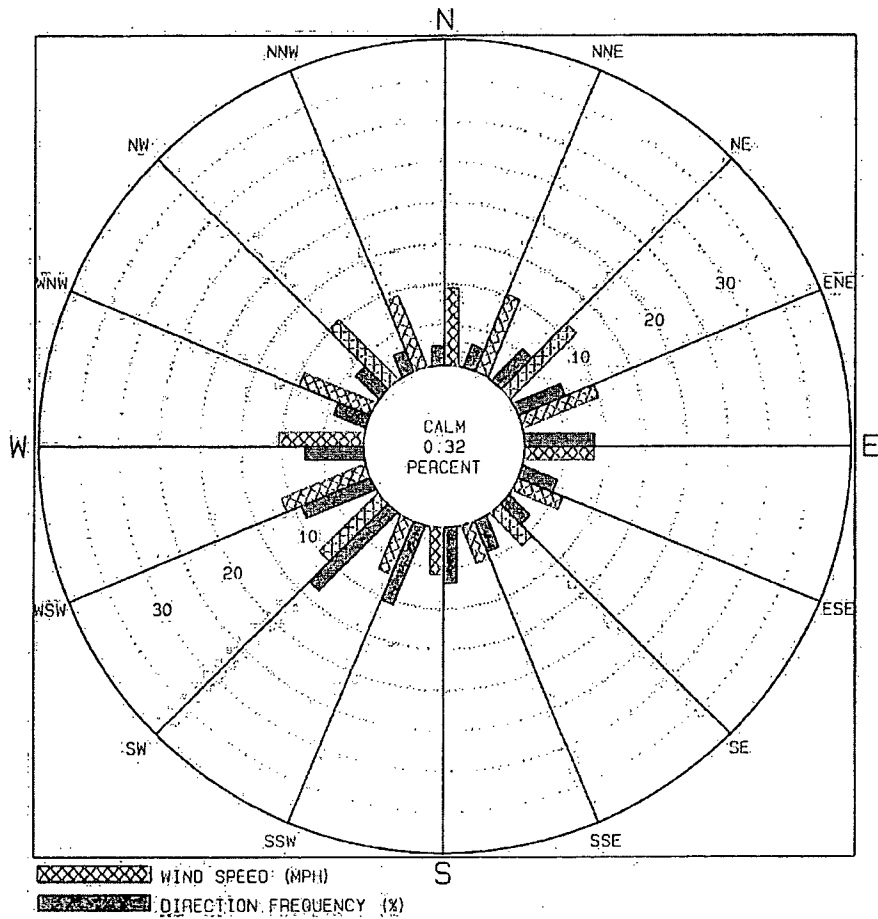
DAVIS-BESSE  
ANNUAL 2009  
100M LEVEL

Figure 33  
Wind Rose Annual Average 75M



DAVIS-BESSE  
ANNUAL 2009  
75M LEVEL

Figure 34  
Wind Rose Annual Average 10M



DAVIS-BESSE  
ANNUAL 2009  
10M LEVEL

**Table 31**  
**Joint Frequency Distribution by Stability Class**

DAVIS-BESSE ENVIRONMENTAL COMPLIANCE UNIT

10-Feb-10 PAGE 91

TIME OF DAY: 12:08:22

PROGRAM: JFD VERSION: F77-1.0

DAVIS-BESSE 75-10 DT, NO BACKUP

SITE IDENTIFIER: 9

DATA PERIOD EXAMINED: 01/01/2009 - 12/31/2009

\*\*\* ANNUAL \*\*\*

**STABILITY CLASS A**  
**BETWEEN 250.0 AND 35.0 FEET**

STABILITY BASED ON: DELTA T

WIND MEASURED AT: 35.0 FEET

WIND THRESHOLD AT: 1.00 MPH

JOINT FREQUENCY DISTRIBUTION OF WIND SPEED AND DIRECTION IN HOURS AT 35.00 FEET

SPEED (MPH)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
CALM																	0
1.01 - 3.49	2	3	0	0	0	0	0	0	0	0	0	1	0	0	0	0	6
3.50 - 7.49	16	10	4	0	1	0	0	2	3	2	2	3	0	0	6	8	57
7.50 - 12.49	6	1	2	1	2	1	0	0	1	3	3	1	0	1	4	23	49
12.50 - 18.49	3	2	1	3	1	0	0	0	0	0	2	0	1	0	4	3	20
18.50 - 24.49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
>24.49	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0
TOTAL	27	16	7	4	4	1	0	2	4	5	7	6	1	1	14	34	133

**STABILITY CLASS B**  
**BETWEEN 250.0 AND 35.0 FEET**

STABILITY BASED ON: DELTA T

WIND MEASURED AT: 35.0 FEET

WIND THRESHOLD AT: 1.00 MPH

JOINT FREQUENCY DISTRIBUTION OF WIND SPEED AND DIRECTION IN HOURS AT 35.00 FEET

SPEED (MPH)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
CALM																	0
1.01 - 3.49	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1	0	3
3.50 - 7.49	17	11	4	0	0	0	1	1	5	1	3	4	2	3	3	10	65
7.50 - 12.49	9	6	2	11	29	1	1	1	0	5	7	6	5	2	21	25	131
12.50 - 18.49	6	0	2	4	6	0	0	0	0	0	3	0	1	3	9	4	38
18.50 - 24.49	0	0	0	1	0	0	0	0	0	0	0	2	0	0	0	0	3
>24.49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	32	17	8	16	35	1	2	2	5	6	13	12	8	10	34	39	240

**Table 31 (continued)**  
**Joint Frequency Distribution by Stability Class**

DAVIS-BESSE ENVIRONMENTAL COMPLIANCE UNIT

10-Feb-10 PAGE 92

TIME OF DAY: 12:08:22

PROGRAM: JFD VERSION: F77-1.0

DAVIS-BESSE 75-10 DT, NO BACKUP

SITE IDENTIFIER: 9

DATA PERIOD EXAMINED: 01/01/2009 - 12/31/2009

\*\*\* ANNUAL \*\*\*

STABILITY CLASS C  
 BETWEEN 250.0 AND 35.0 FEET

STABILITY BASED ON: DELTA T

WIND MEASURED AT: 35.0 FEET

WIND THRESHOLD AT: 1.00 MPH

JOINT FREQUENCY DISTRIBUTION OF WIND SPEED AND DIRECTION IN HOURS AT 35.00 FEET

SPEED (MPH)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
CALM																	0
1.01 - 3.49	0	0	0	0	0	0	0	2	0	0	0	0	1	0	0	0	3
3.50 - 7.49	7	13	25	10	6	2	3	4	17	11	7	10	1	7	5	9	137
7.50 - 12.49	10	4	4	32	27	1	0	2	0	18	25	25	10	7	26	7	198
12.50 - 18.49	3	1	5	11	2	0	0	1	0	3	20	14	10	6	7	4	87
18.50 - 24.49	1	1	0	0	1	0	0	0	0	0	2	5	0	0	0	2	12
>24.49	0	0	0	0	0	0	0	0	0	0	1	4	0	0	0	0	5
TOTAL	21	19	34	53	36	3	3	9	17	32	55	58	22	20	38	22	442

STABILITY CLASS D  
 BETWEEN 250.0 AND 35.0 FEET

STABILITY BASED ON: DELTA T

WIND MEASURED AT: 35.0 FEET

WIND THRESHOLD AT: 1.00 MPH

JOINT FREQUENCY DISTRIBUTION OF WIND SPEED AND DIRECTION IN HOURS AT 35.00 FEET

SPEED (MPH)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
CALM																	1
1.01 - 3.49	2	1	4	2	10	6	12	9	9	14	2	5	8	3	3	2	92
3.50 - 7.49	25	43	62	105	164	127	81	59	71	97	74	46	35	24	24	32	1069
7.50 - 12.49	34	53	129	159	214	83	28	34	62	154	184	151	142	85	84	61	1657
12.50 - 18.49	39	81	136	138	87	5	11	2	20	43	135	179	139	70	66	33	1184
18.50 - 24.49	10	19	34	9	16	0	0	0	1	5	51	76	39	18	13	12	303
>24.49	0	0	2	0	0	0	0	0	0	0	35	21	2	1	0	0	61
TOTAL	110	197	367	413	491	221	132	104	163	313	481	478	365	201	190	140	4367

**Table 31 (continued)**  
**Joint Frequency Distribution by Stability Class**

DAVIS-BESSE ENVIRONMENTAL COMPLIANCE UNIT

10-Feb-10 PAGE 93

TIME OF DAY: 12:08:22

PROGRAM: JFD VERSION: F77-1.0

DAVIS-BESSE 75-10 DT, NO BACKUP

SITE IDENTIFIER: 9

DATA PERIOD EXAMINED: 01/01/2009 - 12/31/2009

\*\*\* ANNUAL \*\*\*

STABILITY CLASS E  
 BETWEEN 250.0 AND 35.0 FEET

STABILITY BASED ON: DELTA T  
 WIND MEASURED AT: 35.0 FEET  
 WIND THRESHOLD AT: 1.00 MPH  
 JOINT FREQUENCY DISTRIBUTION OF WIND SPEED AND DIRECTION IN HOURS AT 35.00 FEET

SPEED (MPH)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
CALM																	5
1.01 - 3.49	6	7	3	4	14	28	37	50	59	34	23	13	9	20	3	8	318
3.50 - 7.49	19	23	24	59	119	162	118	116	128	185	201	89	98	51	33	21	1446
7.50 - 12.49	16	20	39	49	81	26	17	20	56	137	158	70	88	78	56	28	939
12.50 - 18.49	3	4	12	13	11	0	5	3	11	37	60	39	30	9	9	8	254
18.50 - 24.49	0	0	10	1	0	0	0	0	1	6	33	7	6	0	1	0	8
>24.49	0	0	3	0	0	0	0	0	0	0	5	0	0	0	0	0	8
TOTAL	44	54	91	126	225	216	177	189	255	399	480	218	231	158	102	65	3035

STABILITY CLASS F  
 BETWEEN 250.0 AND 35.0 FEET

STABILITY BASED ON: DELTA T  
 WIND MEASURED AT: 35.0 FEET  
 WIND THRESHOLD AT: 1.00 MPH  
 JOINT FREQUENCY DISTRIBUTION OF WIND SPEED AND DIRECTION IN HOURS AT 35.00 FEET

SPEED (MPH)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
CALM																	17
1.01 - 3.49	4	0	3	1	5	4	18	45	62	72	47	35	11	10	7	5	329
3.50 - 7.49	2	1	8	12	19	16	12	41	71	124	118	53	49	22	5	1	554
7.50 - 12.49	0	1	4	2	9	2	1	0	2	12	3	2	5	1	1	0	45
12.50 - 18.49	0	0	1	1	1	0	0	0	0	0	1	0	0	0	0	0	4
18.50 - 24.49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
>24.49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	6	2	16	16	34	22	31	86	135	208	169	90	65	33	13	6	949



**Table 31 (continued)**  
**Joint Frequency Distribution by Stability Class**

DAVIS-BESSE ENVIRONMENTAL COMPLIANCE UNIT

10-Feb-10 PAGE 94

TIME OF DAY: 12:08:22

PROGRAM: JFD VERSION: F77-1.0

DAVIS-BESSE 75-10 DT, NO BACKUP

SITE IDENTIFIER: 9

DATA PERIOD EXAMINED: 01/01/2009 - 12/31/2009

\*\*\* ANNUAL \*\*\*

STABILITY CLASS G  
 BETWEEN 250.0 AND 35.0 FEET

STABILITY BASED ON: DELTA T  
 WIND MEASURED AT: 35.0 FEET  
 WIND THRESHOLD AT: 1.00 MPH  
 JOINT FREQUENCY DISTRIBUTION OF WIND SPEED AND DIRECTION IN HOURS AT 35.00 FEET

SPEED (MPH)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
CALM																	6
1.01 - 3.49	1	1	1	0	4	2	2	14	29	38	34	30	8	2	0	2	168
3.50 - 7.49	0	1	1	1	4	11	4	8	31	40	36	15	5	0	0	0	157
7.50 - 12.49	0	0	0	1	2	2	0	0	0	1	0	0	0	0	0	0	6
12.50 - 18.49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
18.50 - 24.49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
>24.49	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	1	2	2	2	10	15	6	22	60	79	70	45	13	2	0	2	337

STABILITY CLASS ALL  
 BETWEEN 250.0 AND 35.0 FEET

STABILITY BASED ON: DELTA T  
 WIND MEASURED AT: 35.0 FEET  
 WIND THRESHOLD AT: 1.00 MPH  
 JOINT FREQUENCY DISTRIBUTION OF WIND SPEED AND DIRECTION IN HOURS AT 35.00 FEET

SPEED (MPH)	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	TOTAL
CALM																	29
1.01 - 3.49	15	12	11	7	33	40	69	120	159	158	106	84	37	37	14	17	919
3.50 - 7.49	86	102	128	187	313	318	219	231	326	460	441	220	190	107	76	81	3485
7.50 - 12.49	75	85	180	255	364	116	47	57	121	330	380	255	250	174	192	144	3025
12.50 - 18.49	54	88	157	170	108	5	16	6	31	83	221	232	181	88	95	52	1587
18.50 - 24.49	11	20	44	11	17	0	0	0	2	11	86	90	45	18	14	14	383
>24.49	0	0	5	0	0	0	0	0	0	0	41	26	2	1	0	0	75
TOTAL	241	307	525	630	835	479	351	414	639	1042	1275	907	705	425	391	308	9503

## Table 31 (continued)

### Joint Frequency Distribution by Stability Class

\*\*\* \* DAVIS-BESSE ENVIRONMENTAL COMPLIANCE UNIT \*\*\*

\* \*\*10-FEB-10

PAGE 95

TIME OF DAY: 12:08:22

PROGRAM: JFD VERSION: F77-1.0

\*\*\*\*\* DAVIS-BESSE 75-10 DT, NO BACKUP \*\*\*\*\*

SITE IDENTIFIER: 9

DATA PERIOD EXAMINED: 1/ 1/ 9 - 12/ 31/ 9

\*\*\* ANNUAL \*\*\*

STABILITY BASED ON: DELTA T BETWEEN 250.0 AND 35.0 FEET

WIND MEASURED AT: 35.0 FEET

WIND THRESHOLD AT: 1.00 MPH

TOTAL NUMBER OF OBSERVATIONS: 9504

TOTAL NUMBER OF VALID OBSERVATIONS: 9503

TOTAL NUMBER OF MISSING OBSERVATIONS: 1

PERCENT DATA RECOVERY FOR THIS PERIOD: 100.0 %

MEAN WIND SPEED FOR THIS PERIOD: 8.9 MPH

TOTAL NUMBER OF OBSERVATIONS WITH BACKUP DATA: 0

## PERCENTAGE OCCURRENCE OF STABILITY CLASSES

A	B	C	D	E	F	G
1.40	2.53	4.65	45.95	31.94	9.99	3.55

## DISTRIBUTION OF WIND DIRECTION VS STABILITY

	N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW	CALM
A	27	16	7	4	4	1	0	2	4	5	7	6	1	1	14	34	0
B	32	17	8	16	35	1	2	2	5	6	13	12	8	10	34	39	0
C	21	19	34	53	36	3	3	9	17	32	55	58	22	20	38	22	0
D	110	197	367	413	491	221	132	104	163	313	481	478	365	201	190	140	1
E	44	54	91	126	225	216	177	189	255	399	480	218	231	158	102	65	5
F	6	2	16	16	34	22	31	86	135	208	169	90	65	33	13	6	17
G	1	2	2	2	10	15	6	22	60	79	70	45	13	2	0	2	6
TOTAL	241	307	525	630	835	479	351	414	639	1042	1275	907	705	425	391	308	29

## Land and Wetlands Management

The Navarre Marsh, which is part of the Ottawa National Wildlife Refuge, makes up 733 acres of wetlands on the southwestern shore of Lake Erie and surrounds the Davis-Besse Nuclear Power Station. The marsh is owned by FirstEnergy and jointly managed by the U.S. Fish and Wildlife Service and FirstEnergy. Navarre Marsh is divided into three pools. The pools are separated from Lake Erie and each other by a series of dikes and revetments. Davis-Besse is responsible for the maintenance and repair of the dikes and controlling the water levels in each of the pools.

A revetment is a retaining structure designed to hold water back for the purposes of erosion control and beach formation. Revetments are built with a gradual slope, which causes waves to dissipate their energy when they strike their large surface area. Beach formation is encouraged through the passive deposition of sediment. A dike is a retaining structure designed to hold water for the purpose of flood control and to aid in the management of wetland habitat. When used as a marsh management tool, dikes help in controlling water levels in order to maintain desired vegetation and animal species. Manipulating water levels is one of the most important marsh management techniques used in the Navarre Marsh. Three major types of wetland communities exist in Navarre Marsh, the freshwater marsh, the swamp forest, and the wet meadow. Also, there exists a narrow dry beach ridge along the lakefront, with a sandbar extending out into Lake Erie. All these areas provide essential food, shelter and nesting habitat, as well as a resting area for migratory birds.

Davis-Besse personnel combine their efforts with a number of conservation agencies and organizations. The Ottawa National Wildlife Refuge, the Ohio Department of Natural Resources (ODNR), and the Black Swamp Bird Observatory work to preserve and enhance existing habitat. Knowledge is gained through research and is used to help educate the public about the importance of preserving wetlands.

With its location along two major migratory flyways, the Navarre Marsh serves as a refuge for a variety of birds in the spring and fall, giving them an area to rest and restore energy reserves before continuing their migration. The Black Swamp Bird Observatory, a volunteer research group, captures, bands, catalogues, and releases songbirds in the marsh during these periods.

Navarre Marsh is also home to wildlife that is typical of much of the marshland in this area, including deer, fox, coyote, muskrats, mink, rabbits, groundhogs, hawks, owls, ducks, geese, herons, snakes and turtles. For the first time in recent history, a pair of mature American Bald Eagles chose the Navarre Marsh as their nesting site in late 1994, and fledged a healthy eaglet in July 1995. A second pair built a new nest in 1999-2000, and the total number of eagles fledged from these nests since 1995 is twenty-two. Ohio has gone from a low of 4 nesting eagle pairs statewide in 1978 to setting new hatch records every year for nearly three decades.

## Water Treatment Plant Operation

### Description

The Davis-Besse Nuclear Power Station draws water from Lake Erie for its water treatment plant. The lake water is treated with sodium hypochlorite and/or sodium hypo-bromite, coagulant aid, filtration, electrolysis and demineralization to produce high-purity water used in many of the Station's cooling systems.

Water from the Carroll Township Water Treatment Plant is used in Davis-Besse's Fire Protection System.

### Water Treatment System

Raw water from Lake Erie enters an intake structure, then passes through traveling screens which remove debris greater than one-half inch in size. The water is then pumped to chlorine detention tanks. Next, the water is sent to the pre-treatment system, which is comprised of coagulation and filtration to remove sediment, organic debris, and certain dissolved compounds from the raw water. The next step of the process is reverse osmosis, where pressure is used to remove certain impurities by passing the water through a selectively-permeable membrane. The water is then stripped of dissolved gases, softened, electrolytically deionized and finally, is routed through a polishing demineralization process before being sent to storage.

### Domestic Water

When Davis-Besse began operation over 30 years ago, all site domestic water was produced in the Water Treatment Facility. Operation of the domestic water treatment and distribution system, including the collection and analysis of daily samples, was reportable to the Ohio Environmental Protection Agency.

Since December of 1998, the Carroll Township Water Treatment Plant has supplied domestic water to Davis-Besse. Carroll Township Water and Wastewater District follow all applicable regulatory requirements for the sampling and analysis of Station drinking water.

### Zebra Mussel Control

With the exception of its domestic water, the Plant withdraws all of its water through an intake system from Lake Erie. Zebra mussels can severely impact the availability of water for Plant processes. *Dreissena polymorpha*, commonly known as the zebra mussel, is a native European bivalve that was introduced into the Great Lakes in 1986 and was discovered in Lake Erie in 1989. Zebra mussels are prolific breeders that rapidly colonize an area by forming byssal threads, which enable them to attach to solid surfaces and to each other. Because of their ability to attach in this manner, they may form layers several inches deep. This poses a problem to facilities that rely on water intakes from Lake Erie because mussels may attach to the intake structures and restrict water flow.

Zebra mussels have not caused any significant problems at Davis-Besse, but mussels have been found attached to the intake crib (the structure that allows water to be withdrawn from the lake) and the first section of the intake conduit (the pipe that connects the crib to the intake canal).

Mussels have also been found on the trash racks and on the walls of intake bay #3 prior to the traveling screens, and are periodically cleaned off by using high-pressure water. Davis-Besse uses continuous low level chlorination/bromination of the intake bays to control the mussels.

At present, the mussel population appears to be leveling off or declining. This is likely due to the increasing clarity of Lake Erie, since the mussels remove much of the algae. As the food source for the zebra mussel declines, mussel populations should continue to decline correspondingly.

### Wastewater Treatment Plant (WWTP) Operation

The WWTP operation is supervised by an Ohio licensed Wastewater Operator. Wastewater generated by site personnel is treated in an onsite extended aeration package treatment facility designed to accommodate up to 38,000 gallons per day. In the treatment process, wastewater from the various collection points around the site enters the facility through a grinder, from where it is distributed to the surge tanks of one or both of the treatment plants.

The wastewater is then pumped into aeration tanks, where it is digested by microorganisms. Oxygen is necessary for good sewage treatment, and is provided to the microbes by blowers and diffusers. The mixture of organics, microorganisms, and decomposed wastes is called activated sludge. The treated wastewater settles in a clarifier, and the clear liquid leaves the clarifier under a weir and exits the plant through an effluent trough. The activated sludge contains the organisms necessary for continued treatment, and is pumped back to the aeration tank to digest incoming wastewater. The effluent leaving the plant is drained to the wastewater basin (NPDES Outfall 601) where further treatment takes place.

### Summary of 2009 Wastewater Treatment Plant Operations

All wastewater parameters were within specifications during the year 2009.

### National Pollutant Discharge Elimination System (NPDES) Reporting

The Ohio Environmental Protection Agency (OEPA) has established limits on the amount of pollutants that Davis-Besse may discharge to the environment. These limits are regulated through the Station's National Pollutant Discharge Elimination System (NPDES) permit, number 2IB00011. Parameters such as chlorine, suspended solids and pH are monitored under the NPDES permit. Davis-Besse personnel prepare the NPDES Reports and submit them to the OEPA each month.

Davis-Besse has eight sampling points described in the NPDES permit. Seven of these locations are discharge points, or outfalls, and one is a temperature monitoring location. Descriptions of these sampling points follow:

**Outfall 001**

**Collection Box:** a point representative of discharge to Lake Erie

**Source of Wastes:** Low volume wastes (Outfalls 601 and 602), Circulating Water system blow-down and Service Water

**Outfall 002**

**Area Runoff:** Discharge to Toussaint River

**Source of Wastes:** Storm water runoff, Circulating Water pump house sumps

**Outfall 003**

**Screenwash Catch Basin:** Outfall to Navarre Marsh

**Source of Wastes:** Backwash water and debris from water intake screens

**Outfall 004**

**Cooling Tower Basin Ponds:** Outfall to State Route 2 Ditch

**Source of Wastes:** Circulating Water System drain (only during system outages)

**Outfall 588**

**Sludge Monitoring**

**Source of Wastes:** Wastewater Plant sludge shipped for offsite processing

**Outfall 601**

**Wastewater Plant Tertiary Treatment Basin:** Discharge from Wastewater Treatment Plant

**Sources of Wastes:** Wastewater Treatment Plant

**Outfall 602**

**Low volume wastes:** Discharge from settling basins

**Sources of wastes:** Water treatment residues, Condensate Polishing Holdup Tank decants and Condensate Pit sumps

**Sampling Point 801**

**Intake Temperature:** Intake water prior to cooling operation

**2009 NPDES Summary**

During 2009, Davis-Besse Nuclear Power Station did not exceed any NPDES discharge limits.

## Chemical Waste Management

The Chemical Waste Management Program for hazardous and nonhazardous chemical wastes generated at the Davis-Besse Nuclear Power Station was developed to ensure wastes are managed and disposed of in accordance with all applicable state and federal regulations.

### Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) is the statute which regulates solid hazardous waste. Solid waste is defined as a solid, liquid, semi-solid, or contained gaseous material. The major goals of RCRA are to establish a hazardous waste regulatory program to protect human health and the environment and to encourage the establishment of solid waste management, resource recovery, and resource conservation systems. The intent of the hazardous waste management program is to control hazardous wastes from the time they are generated until they are properly disposed of, commonly referred to as "cradle to grave" management. Anyone who generates, transports, stores, treats, or disposes of hazardous waste are subject to regulation under RCRA.

Under RCRA, there are essentially three categories of waste generators:

- Large quantity Generators - A facility which generates 1,000 kilograms/month (2,200 lbs./month) or more.
- Small quantity Generators - A facility which generates less than 1,000 kilograms/month (2,200 lbs./month).
- Conditionally Exempt Small Quantity Generators - A facility which generates 100 kilograms/month (220 lbs./month).

In 2009, the Davis-Besse Nuclear Power Station generated approximately 2,250 pounds of hazardous waste.

Non-hazardous waste generated in 2009 included 3,000 gallons of used oil and other nonhazardous wastes such as oil filters, latex paints and caulks.

RCRA mandates other requirements such as the use of proper storage and shipping containers, labels, manifests, reports, personnel training, a spill control plan and an accident contingency plan. These are part of the Chemical Management Program at Davis-Besse. The following are completed as part of the hazardous waste management program and RCRA regulations:

- Weekly Inspections of the Chemical Waste Accumulation Areas are designated throughout the site to ensure proper handling and disposal of chemical waste. These, along with the Chemical Waste Storage Area, are routinely patrolled by security personnel and inspected weekly by Environmental and Chemistry personnel. All areas used for storage or accumulation of hazardous waste are posted with warning signs and drums are color-coded for easy identification of waste categories.
- Waste Inventory Forms are placed on waste accumulation drums or provided in the accumulation area for employees to record the waste type and amount when chemicals are

added to the drum. This ensures that incompatible wastes are not mixed and also identifies the drum contents for proper disposal.

## Other Environmental Regulating Acts

### Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, or Superfund) established a federal authority and source of funding for responding to spills and other releases of hazardous materials, pollutants and contaminants into the environment. Superfund establishes "reportable quantities" for several hundred hazardous materials and regulates the cleanup of abandoned hazardous waste disposal sites.

### Superfund Amendment and Reauthorization Act (SARA)

Superfund was amended in October 1986 to establish new reporting programs dealing with emergency preparedness and community right-to-know laws. As part of this program, CERCLA is enhanced by ensuring that the potential for release of hazardous substances is minimized, and that adequate and timely responses are made to protect surrounding populations.

Davis-Besse conducts site-wide inspections to identify and record all hazardous products and chemicals onsite as required by SARA. Determinations are made as to which products and chemicals are present in reportable quantities.

Annual SARA reports are submitted to local fire departments and state and local planning commissions by March 1 for the preceding calendar year.

### Toxic Substances Control Act (TSCA)

The Toxic Substance Control Act (TSCA) was enacted to provide the USEPA with the authority to require testing of new chemical substances for potential health effects before they are introduced into the environment, and to regulate them where necessary. This law would have little impact on utilities except for the fact that one family of chemicals, polychlorinated biphenyls (PCBs), has been singled out by TSCA. This has resulted in an extensive PCB management system, very similar to the hazardous waste management system established under RCRA.

In 1992, Davis-Besse completed an aggressive program that eliminated PCB transformers onsite. PCB transformers were either changed out with non-PCB fluid transformers or retrofilled with non-PCB liquid.

Retro-filling PCB transformers involves flushing the PCB fluid out of a transformer, refilling it with PCB-leaching solvents and allowing the solvent to circulate in the transformer during operation. The entire retro-fill process takes several years and will extract almost all of the PCB. In all, Davis-Besse performed retro-fill activities on eleven PCB transformers between 1987 and 1992. The only remaining PCB containing equipment onsite are a limited number of capacitors. These capacitors are being replaced and disposed of during scheduled maintenance activities.



## Clean Air Act

The Clean Air Act identifies substances that are considered air pollutants. Davis-Besse holds an OEPA permit to operate an Air Contaminant Source for the station Auxiliary Boiler. This boiler is used to heat the station and provide steam to plant systems when the reactor is not operating. A report detailing the Auxiliary Boiler operation is submitted annually.

The Ohio EPA has granted an exemption from permitting our six emergency diesel engines, including the Station Blackout Diesel Generator, the 2 Emergency Diesel Generators, the Emergency Response Facility Diesel Generator, the Miscellaneous Diesel, and the Fire Pump Diesel. These sources are operated infrequently to verify their reliability, and would only be used in the event of an emergency.

In response to recent "Clean Air Act Title V" legislation, an independent study identifying and quantifying all of the air pollution sources onsite was performed. Of particular significance is asbestos removal from renovation and demolition projects for which USEPA has outlined specific regulations concerning handling, removal, environmental protection, and disposal. Also, the Occupational Safety and Health Protection Administration (OSHA) strictly regulates asbestos with a concern for worker protection. Removal teams must meet medical surveillance, respirator fit tests, and training requirements prior to removing asbestos-containing material. Asbestos is not considered a hazardous waste by RCRA, but the EPA does require special handling and disposal of this waste under the Clean Air Act.

## Transportation Safety Act

The transportation of hazardous chemicals, including chemical waste, is regulated by the Transportation Safety Act of 1976. These regulations are enforced by the United States Department of Transportation (DOT) and cover all aspects of transporting hazardous materials, including packing, handling, labeling, marking, and placarding. Before any wastes are transported off site, Davis-Besse must ensure that the wastes are identified, labeled and marked according to DOT regulations, including verification that the vehicle has appropriate placards and it is in good operating condition.

## Other Environmental Programs

### Underground Storage Tanks

According to RCRA, facilities with Underground Storage Tanks (USTs) are required to notify the State. This regulation was implemented in order to provide protection from tank contents leaking and causing damage to the environment. Additional standards require leak detection systems and performance standards for new tanks. At Davis-Besse two 40,000 gallon and one 8,000 gallon diesel fuel storage tanks are registered USTs.

### Spill Kits

Spill control equipment is maintained throughout the Station at chemical storage areas and hazardous chemical and oil use areas. Equipment in the kits may include chemical-resistant coveralls, gloves, boots, decontamination agents, absorbent cloth, goggles and warning signs.

### Waste Minimization and Recycling

Municipal Solid Waste (MSW) is normal trash produced by individuals at home and by industries. In some communities, MSW is burned in specially designed incinerators to produce power or is separated into waste types (such as aluminum, glass, and paper) and recycled. The vast majority of MSW is sent to landfills for disposal. As the population increases and older landfills reach their capacity, MSW disposal becomes an important economic, health, and resource issue.

The State of Ohio has addressed the issue with the State Solid Waste Management Plan, otherwise known as Ohio House Bill 592. The intent of the bill is to extend the life of existing landfills by reducing the amount of MSW produced, by reusing certain waste material, and by recycling other wastes. This is frequently referred to as "**Reduce, Reuse, and Recycle.**"

Davis-Besse has implemented and participated in company wide programs that emphasize the reduction, reuse, recycle approach to MSW management. An active Investment Recovery Program has greatly contributed to the reduction of both hazardous and municipal waste generated by evaluating options for uses of surplus materials prior to the materials entering Davis-Besse's waste streams. Such programs include paper, cardboard, aluminum cans, used tires, and metals recycling or recovery. Paper and cardboard recycling is typically in excess of 50 tons annually. This represents a large volume of recyclable resources, which would have otherwise been placed in a landfill. Aluminum soft drink cans are collected for the Boy Scouts of America to recycle. Additionally, lead-acid batteries are recycled and tires are returned to the seller for proper disposal.

Although scrap metal is not usually considered part of the MSW stream, Davis-Besse collects and recycles scrap metals, which are sold at market price to a scrap dealer for resource recovery.



## APPENDIX A

### INTERLABORATORY COMPARISON PROGRAM RESULTS

**NOTE:** Environmental Inc., Midwest Laboratory participates in intercomparison studies administered by Environmental Resources Associates, and serves as a replacement for studies conducted previously by the U.S. EPA Environmental Monitoring Systems Laboratory, Las Vegas, Nevada. Results are reported in Appendix A. TLD Intercomparison results, in-house spikes, blanks, duplicates and mixed analyte performance evaluation program results are also reported. Appendix A is updated four times a year; the complete Appendix is included in March, June, September and December monthly progress reports only.

January, 2009 through December, 2009

## Appendix A

### Interlaboratory Comparison Program Results

Environmental, Inc., Midwest Laboratory has participated in interlaboratory comparison (crosscheck) programs since the formulation of its quality control program in December 1971. These programs are operated by agencies which supply environmental type samples containing concentrations of radionuclides known to the issuing agency but not to participant laboratories. The purpose of such a program is to provide an independent check on a laboratory's analytical procedures and to alert it of any possible problems.

Participant laboratories measure the concentration of specified radionuclides and report them to the issuing agency. Several months later, the agency reports the known values to the participant laboratories and specifies control limits. Results consistently higher or lower than the known values or outside the control limits indicate a need to check the instruments or procedures used.

Results in Table A-1 were obtained through participation in the environmental sample crosscheck program administered by Environmental Resources Associates, serving as a replacement for studies conducted previously by the U.S. EPA Environmental Monitoring Systems Laboratory, Las Vegas, Nevada.

The results in Table A-2 list results for thermoluminescent dosimeters (TLDs), via International Intercomparison of Environmental Dosimeters, when available, and internal laboratory testing.

Table A-3 lists results of the analyses on in-house "spiked" samples for the past twelve months. All samples are prepared using NIST traceable sources. Data for previous years available upon request.

Table A-4 lists results of the analyses on in-house "blank" samples for the past twelve months. Data for previous years available upon request.

Table A-5 lists REMP specific analytical results from the in-house "duplicate" program for the past twelve months. Acceptance is based on the difference of the results being less than the sum of the errors. Complete analytical data for duplicate analyses is available upon request.

The results in Table A-6 were obtained through participation in the Mixed Analyte Performance Evaluation Program.

Results in Table A-7 were obtained through participation in the environmental sample crosscheck program administered by Environmental Resources Associates, serving as a replacement for studies conducted previously by the Environmental Measurement Laboratory Quality Assessment Program (EML).

Attachment A lists the laboratory precision at the 1 sigma level for various analyses. The acceptance criteria in Table A-3 is set at  $\pm 2$  sigma.

Out-of-limit results are explained directly below the result.

Attachment A

## ACCEPTANCE CRITERIA FOR "SPIKED" SAMPLES

LABORATORY PRECISION: ONE STANDARD DEVIATION VALUES FOR VARIOUS ANALYSES<sup>a</sup>

Analysis	Level	One standard deviation for single determination
Gamma Emitters	5 to 100 pCi/liter or kg > 100 pCi/liter or kg	5.0 pCi/liter 5% of known value
Strontium-89 <sup>b</sup>	5 to 50 pCi/liter or kg > 50 pCi/liter or kg	5.0 pCi/liter 10% of known value
Strontium-90 <sup>b</sup>	2 to 30 pCi/liter or kg > 30 pCi/liter or kg	5.0 pCi/liter 10% of known value
Potassium-40	≥ 0.1 g/liter or kg	5% of known value
Gross alpha	≤ 20 pCi/liter > 20 pCi/liter	5.0 pCi/liter 25% of known value
Gross beta	≤ 100 pCi/liter > 100 pCi/liter	5.0 pCi/liter 5% of known value
Tritium	≤ 4,000 pCi/liter > 4,000 pCi/liter	± 1σ = 169.85 x (known) <sup>0.0933</sup> 10% of known value
Radium-226,-228	≥ 0.1 pCi/liter	15% of known value
Plutonium	≥ 0.1 pCi/liter, gram, or sample	10% of known value
Iodine-131, Iodine-129 <sup>b</sup>	≤ 55 pCi/liter > 55 pCi/liter	6 pCi/liter 10% of known value
Uranium-238, Nickel-63 <sup>b</sup> Technetium-99 <sup>b</sup>	≤ 35 pCi/liter > 35 pCi/liter	6 pCi/liter 15% of known value
Iron-55 <sup>b</sup>	50 to 100 pCi/liter > 100 pCi/liter	10 pCi/liter 10% of known value
Other Analyses <sup>b</sup>	---	20% of known value

<sup>a</sup> From EPA publication, "Environmental Radioactivity Laboratory Intercomparison Studies Program, Fiscal Year, 1981-1982, EPA-600/4-81-004.

<sup>b</sup> Laboratory limit.

TABLE A-1. Interlaboratory Comparison Crosscheck program, Environmental Resource Associates (ERA)<sup>a</sup>.

Concentration (pCi/L)								
Lab Code	Date	Analysis	Laboratory Result <sup>b</sup>		ERA Result <sup>c</sup>	Control Limits		Acceptance
STW-1181	04/06/09	Sr-89	41.0	± 5.8	48.3	37.8	- 55.7	Pass
STW-1181	04/06/09	Sr-90	32.4	± 2.4	31.4	22.9	- 36.4	Pass
STW-1182	04/06/09	Ba-133	44.6	± 3.1	52.7	43.4	- 58.3	Pass
STW-1182	04/06/09	Co-60	81.0	± 3.1	88.9	80.0	- 100.0	Pass
STW-1182	04/06/09	Cs-134	65.6	± 5.2	72.9	59.5	- 80.2	Pass
STW-1182 <sup>d</sup>	04/06/09	Cs-137	147.7	± 5.3	168.0	151.0	- 187.0	Fail
STW-1182	04/06/09	Zn-65	79.8	± 7.5	84.4	76.0	- 101.0	Pass
STW-1183	04/06/09	Gr. Alpha	47.6	± 2.1	54.2	28.3	- 67.7	Pass
STW-1183	04/06/09	Gr. Beta	38.5	± 1.3	43.5	29.1	- 50.8	Pass
STW-1184	04/06/09	I-131	24.4	± 2.5	26.1	21.7	- 30.8	Pass
STW-1185	04/06/09	Ra-226	14.0	± 0.7	15.1	11.2	- 17.3	Pass
STW-1185	04/06/09	Ra-228	14.3	± 2.1	13.6	9.0	- 16.6	Pass
STW-1185	04/06/09	Uranium	25.0	± 0.2	25.7	20.6	- 28.8	Pass
STW-1186 <sup>e</sup>	04/06/09	H-3	22819.0	± 453.0	20300.0	17800.0	- 22300.0	Fail
STW-1193	10/05/09	Sr-89	53.0	± 6.0	62.2	50.2	- 70.1	Pass
STW-1193	10/05/09	Sr-90	31.1	± 2.2	30.7	22.4	- 35.6	Pass
STW-1194	10/05/09	Ba-133	82.5	± 3.5	92.9	78.3	- 102.0	Pass
STW-1194	10/05/09	Co-60	116.8	± 3.3	117.0	105.0	- 131.0	Pass
STW-1194	10/05/09	Cs-134	78.8	± 5.7	78.8	65.0	- 87.3	Pass
STW-1194	10/05/09	Cs-137	54.2	± 3.7	54.6	49.1	- 62.9	Pass
STW-1194	10/05/09	Zn-65	102.5	± 6.2	99.5	89.6	- 119.0	Pass
STW-1195	10/05/09	Gr. Alpha	20.3	± 2.0	23.2	11.6	- 31.1	Pass
STW-1195	10/05/09	Gr. Beta	23.7	± 1.4	26.0	16.2	- 33.9	Pass
STW-1196	10/05/09	I-131	22.4	± 1.4	22.2	18.4	- 26.5	Pass
STW-1197	10/05/09	Ra-226	15.0	± 0.7	13.9	10.4	- 16.0	Pass
STW-1197	10/05/09	Ra-228	17.4	± 2.0	14.9	10.0	- 18.0	Pass
STW-1197	10/05/09	Uranium	32.5	± 0.4	33.8	27.3	- 37.8	Pass
STW-1198	10/05/09	H-3	17228.0	694.0	16400. 0	14300. 0	- 180000	Pass

<sup>a</sup> Results obtained by Environmental, Inc., Midwest Laboratory as a participant in the crosscheck program for proficiency testing in drinking water conducted by Environmental Resources Associates (ERA).

<sup>b</sup> Unless otherwise indicated, the laboratory result is given as the mean ± standard deviation for three determinations.

<sup>c</sup> Results are presented as the known values, expected laboratory precision (1 sigma, 1 determination) and control limits as provided by ERA.

<sup>d</sup> All gamma -emitters showed a low bias. A large plastic burr found on the base of the Marinelli kept the beaker from sitting directly on the detector. Result of recount in a different beaker, Cs-137, 155.33 ± 14.55 pCi/L.

<sup>e</sup> Samples were recounted and also reanalyzed. A recount of the original vials averaged 23,009 pCi/L. Reanalysis results were acceptable, 19,170 pCi/L.

Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

TABLE A-2. Crosscheck program results; Thermoluminescent Dosimetry, (TLD, CaSO<sub>4</sub>: Dy Cards).

Lab Code	Date	Description	Known Value	mR		Control Limits	Acceptance
				Lab Result	$\pm 2$ sigma		

Environmental, Inc.

2009-1	7/6/2009	40 cm.	41.82	45.43	$\pm 3.66$	29.27 - 54.37	Pass
2009-1	7/6/2009	50 cm.	26.76	32.17	$\pm 1.52$	18.73 - 34.79	Pass
2009-1	7/6/2009	60 cm.	18.58	20.23	$\pm 1.60$	13.01 - 24.15	Pass
2009-1	7/6/2009	70 cm.	13.65	15.28	$\pm 0.79$	9.56 - 17.75	Pass
2009-1	7/6/2009	90 cm.	8.26	7.97	$\pm 0.40$	5.78 - 10.74	Pass
2009-1	7/6/2009	90 cm.	8.26	7.37	$\pm 0.49$	5.78 - 10.74	Pass
2009-1	7/6/2009	100 cm.	6.69	6.16	$\pm 0.64$	4.68 - 8.70	Pass
2009-1	7/6/2009	110 cm.	5.53	4.38	$\pm 0.24$	3.87 - 7.19	Pass
2009-1	7/6/2009	120 cm.	4.65	4.34	$\pm 0.23$	3.26 - 6.05	Pass
2009-1	7/6/2009	150 cm.	2.97	2.92	$\pm 0.25$	2.08 - 3.86	Pass

Environmental, Inc.

2009-2	12/27/2009	40 cm.	44.83	51.38	$\pm 2.69$	31.38 - 58.28	Pass
2009-2	12/27/2009	50 cm.	28.69	31.65	$\pm 2.81$	20.08 - 37.30	Pass
2009-2	12/27/2009	60 cm.	19.92	21.38	$\pm 1.19$	13.94 - 25.90	Pass
2009-2	12/27/2009	60 cm.	19.92	22.30	$\pm 0.50$	13.94 - 25.90	Pass
2009-2	12/27/2009	75 cm.	12.75	13.48	$\pm 1.02$	8.93 - 16.58	Pass
2009-2	12/27/2009	90 cm.	8.85	9.62	$\pm 0.74$	6.20 - 11.51	Pass
2009-2	12/27/2009	90 cm.	8.85	8.39	$\pm 0.86$	6.20 - 11.51	Pass
2009-2	12/27/2009	100 cm.	7.17	6.65	$\pm 0.96$	5.02 - 9.32	Pass
2009-2	12/27/2009	120 cm.	4.98	4.89	$\pm 0.53$	3.49 - 6.47	Pass
2009-2	12/27/2009	120 cm.	4.98	4.92	$\pm 0.58$	3.49 - 6.47	Pass
2009-2	12/27/2009	150 cm.	3.19	2.74	$\pm 0.39$	2.23 - 4.15	Pass
2009-2	12/27/2009	180 cm.	2.21	1.65	$\pm 0.33$	1.55 - 2.87	Pass
2009-2	12/27/2009	180 cm.	2.21	2.12	$\pm 0.69$	1.55 - 2.87	Pass

TABLE A-3. In-House "Spike"  
Samples

Lab Code <sup>b</sup>	Date	Analysis	Concentration (pCi/L) <sup>a</sup>					Acceptance
			Laboratory results 2s, n=1 <sup>c</sup>	Known Activity	Control Limits <sup>d</sup>			
W-12009	1/20/2009	Ra-226	12.88 ± 0.41	12.69	8.88	- 16.50	Pass	
W-12009	1/27/2009	Gr. Alpha	20.20 ± 0.40	20.08	10.04	- 30.12	Pass	
W-12709	1/27/2009	Gr. Beta	46.26 ± 0.42	45.60	35.60	- 55.60	Pass	
SPW-5553	1/27/2009	Ra-228	29.11 ± 2.53	28.66	20.06	- 37.26	Pass	
SPW-217	1/29/2009	U-238	44.98 ± 2.30	41.70	29.19	- 54.21	Pass	
SPW-539	2/24/2009	Ni-63	167.93 ± 3.79	211.00	147.70	- 274.30	Pass	
SPW-718	3/6/2009	C-14	4893.50 ± 21.69	4740.20	2844.12	- 6636.28	Pass	
SPMI-814	3/16/2009	Cs-134	34.91 ± 3.85	35.70	25.70	- 45.70	Pass	
SPMI-814	3/16/2009	Cs-137	59.17 ± 6.70	55.60	45.60	- 65.60	Pass	
SPMI-814	3/16/2009	Sr-90	40.82 ± 1.59	44.07	35.26	- 52.88	Pass	
SPMI-815	3/16/2009	I-131	70.99 ± 0.62	69.60	55.68	- 83.52	Pass	
SPMI-815	3/16/2009	I-131(G)	63.08 ± 7.12	69.60	59.60	- 79.60	Pass	
SPW-817	3/16/2009	I-131	62.11 ± 0.59	69.60	55.68	- 83.52	Pass	
SPW-817	3/16/2009	I-131(G)	64.55 ± 8.32	69.60	59.60	- 79.60	Pass	
SPW-818	3/16/2009	Co-60	50.84 ± 4.70	51.99	41.99	- 61.99	Pass	
SPW-818	3/16/2009	Cs-134	33.78 ± 3.42	35.70	25.70	- 45.70	Pass	
SPW-818	3/16/2009	Cs-137	61.27 ± 7.18	55.64	45.64	- 65.64	Pass	
SPW-818	3/16/2009	Sr-90	47.26 ± 1.89	44.07	35.26	- 52.88	Pass	
SPAP-903	3/23/2009	Cs-134	13.29 ± 2.89	14.19	4.19	- 24.19	Pass	
SPAP-903	3/23/2009	Cs-137	103.24 ± 7.54	111.23	100.11	- 122.35	Pass	
SPCH-916	3/24/2009	I-131(G)	0.22 ± 0.02	0.22	0.13	- 0.31	Pass	
SPVE-888	4/1/2009	I-131(G)	0.40 ± 0.08	0.35	0.21	- 0.49	Pass	
SPF-820	4/7/2009	Cs-134	0.58 ± 0.02	0.56	0.34	- 0.78	Pass	
W-40909	4/9/2009	Gr. Alpha	19.26 ± 0.40	20.08	10.04	- 30.12	Pass	
W-40909	4/9/2009	Gr. Beta	48.04 ± 0.42	45.60	35.60	- 55.60	Pass	
SPW-12641	4/10/2009	Ra-228	40.06 ± 2.79	40.54	28.38	- 52.70	Pass	
SPW-1267	4/10/2009	U-238	41.71 ± 2.25	41.70	29.19	- 54.21	Pass	
TWW-2124	4/21/2009	H-3	7932.00 ± 279.00	7063.00	5650.40	- 8475.60	Pass	
W-42809	4/28/2009	Ra-226	14.49 ± 0.53	16.78	11.75	- 21.81	Pass	
SPMI-2186	5/12/2009	Cs-134	32.55 ± 1.26	33.89	23.89	- 43.89	Pass	
SPMI-2186	5/12/2009	Cs-137	54.27 ± 2.60	55.60	45.60	- 65.60	Pass	
SPMI-2186	5/12/2009	I-131	60.81 ± 0.63	52.40	40.40	- 64.40	Pass	
SPMI-2186	5/12/2009	I-131(G)	56.89 ± 2.56	52.40	42.40	- 62.40	Pass	
SPMI-2186	5/12/2009	Sr-90	43.88 ± 1.68	52.40	41.92	- 62.88	Pass	
SPW-2497	5/27/2009	Fe-55	2472.37 ± 10.76	2106.35	1685.08	- 2527.62	Pass	
SPW-3448	7/14/2009	Cs-137	171.06 ± 9.21	166.10	149.49	- 182.71	Pass	
SPW-3497	7/15/2009	Ni-63	179.99 ± 3.06	210.40	147.28	- 273.52	Pass	
SPW-3499	7/15/2009	Tc-99	29.61 ± 0.81	32.34	20.34	- 44.34	Pass	
SPMI-3582	7/17/2009	Cs-134	32.86 ± 3.72	31.89	21.89	- 41.89	Pass	
SPMI-3582	7/17/2009	Cs-137	182.49 ± 10.54	166.10	149.49	- 182.71	Pass	
SPAP-3595	7/17/2009	Cs-134	13.01 ± 3.00	12.75	2.75	- 22.75	Pass	
SPAP-3595	7/17/2009	Cs-137	110.63 ± 6.58	110.73	99.66	- 121.80	Pass	



TABLE A-3. In-House "Spike"  
Samples

Lab Code <sup>b</sup>	Date	Analysis	Concentration (pCi/L) <sup>a</sup>		Known Activity	Control Limits <sup>c</sup>	Acceptance
			Laboratory results	2s, n=1			
SPF-3597	7/17/2009	Cs-134	0.53	± 0.03	0.51	0.31 - 0.71	Pass
SPF-3597	7/17/2009	Cs-137	2.43	± 0.05	2.22	1.33 - 3.10	Pass
SPW-3599	7/17/2009	H-3	63246.00	± 725.0	62495.00	49996.00 - 74994.00	Pass
SPW-12643	8/3/2009	Ra-228	38.18	± 2.72	40.54	28.38 - 52.70	Pass
W-80709	8/7/2009	Ra-226	16.28	± 0.41	16.77	11.74 - 21.80	Pass
W-81009	8/10/2009	Gr. Alpha	20.58	± 0.44	20.08	10.04 - 30.12	Pass
W-81009	8/10/2009	Gr. Beta	44.44	± 0.40	45.60	35.60 - 55.60	Pass
W-100109	10/1/2009	Ra-226	15.68	± 0.41	16.77	11.74 - 21.80	Pass
W-102709	10/27/2009	Gr. Alpha	21.50	± 0.43	20.08	10.04 - 30.12	Pass
W-102709	10/27/2009	Gr. Beta	44.83	± 0.40	45.60	35.60 - 55.60	Pass
SPW-5964	10/28/2009	U-238	40.20	± 1.87	41.70	29.19 - 54.21	Pass
SPW-12647	11/6/2009	Ra-228	44.49	± 3.33	40.54	28.38 - 52.70	Pass
SPAP-6769	12/14/2009	Gr. Beta	45.43	± 0.11	49.48	29.69 - 69.27	Pass
SPAP-6774	12/14/2009	Cs-134	10.32	± 0.83	11.11	1.11 - 21.11	Pass
SPAP-6774	12/14/2009	Cs-137	106.58	± 2.51	109.70	98.73 - 120.67	Pass
SPF-6776	12/14/2009	Cs-134	0.43	± 0.02	0.44	0.26 - 0.62	Pass
SPF-6776	12/14/2009	Cs-137	2.33	± 0.05	2.19	1.31 - 3.07	Pass
SPW-6780	12/14/2009	Tc-99	30.71	± 1.09	32.34	20.34 - 44.34	Pass
SPMI-6782	12/14/2009	Co-60	74.30	± 5.41	72.81	62.81 - 82.81	Pass
SPMI-6782	12/14/2009	Cs-134	58.82	± 3.75	55.54	45.54 - 65.54	Pass
SPMI-6782	12/14/2009	Cs-137	178.18	± 9.68	164.55	148.10 - 181.01	Pass
SPW-6784	12/14/2009	Co-60	74.03	± 4.64	72.81	62.81 - 82.81	Pass
SPW-6784	12/14/2009	Cs-134	54.84	± 3.83	55.54	45.54 - 65.54	Pass
SPW-6784	12/14/2009	Cs-137	180.06	± 8.81	164.55	148.10 - 181.01	Pass

<sup>a</sup> Liquid sample results are reported in pCi/Liter, air filters( pCi/filter), charcoal (pCi/m<sup>3</sup>), and solid samples (pCi/g).

<sup>b</sup> Laboratory codes as follows: W (water), MI (milk), AP (air filter), SO (soil), VE (vegetation), CH (charcoal canister), F (fish).

<sup>c</sup> Results are based on single determinations.

<sup>d</sup> Control limits are established from the precision values listed in Attachment A of this report, adjusted to  $\pm 2\sigma$ .

<sup>e</sup> Control limits based on the laboratory limit, Attachment A ("Other Analyses").

NOTE: For fish, Jello is used for the Spike matrix. For Vegetation, cabbage is used for the Spike matrix.

TABLE A-4. In-House "Blank" Samples

Lab Code	Sample Type	Date	Analysis <sup>b</sup>	Concentration (pCi/L) <sup>a</sup>		
				Laboratory results (4.66 $\sigma$ )		Acceptance
				LLD	Activity <sup>c</sup>	Criteria (4.66 $\sigma$ )
W-12009	Water	1/20/2009	Ra-226	0.05	0.06 $\pm$ 0.04	1
SPW-5554	Water	1/27/2009	Ra-228	0.08	0.17 $\pm$ 0.40	2
W-12709	Water	1/27/2009	Gr. Alpha	0.35	0.22 $\pm$ 0.27	1
W-12709	Water	1/27/2009	Gr. Beta	0.74	-0.08 $\pm$ 0.51	3.2
SPW-218	Water	1/29/2009	U-238	0.19	-0.06 $\pm$ 0.09	1
SPW-538	Water	2/24/2009	Ni-63	7.91	4.96 $\pm$ 4.93	20
SPW-717	Water	3/6/2009	C-14	7.66	3.03 $\pm$ 4.71	200
SPMI-816	Milk	3/16/2009	Cs-134	3.24	-	10
SPMI-816	Milk	3/16/2009	Cs-137	3.38	-	10
SPMI-816	Milk	3/16/2009	I-131	0.31	0.04 $\pm$ 0.17	0.5
SPMI-816	Milk	3/16/2009	I-131(G)	3.65	-	20
SPMI-816	Milk	3/16/2009	Sr-90	0.48	0.41 $\pm$ 0.27	1
SPW-819	Water	3/16/2009	Co-60	3.02	-	10
SPW-819	Water	3/16/2009	Cs-134	2.25	-	10
SPW-819	Water	3/16/2009	Cs-137	2.03	-	10
SPW-819	Water	3/16/2009	I-131	0.42	-0.06 $\pm$ 0.19	0.5
SPW-819	Water	3/16/2009	I-131(G)	3.02	-	20
SPW-819	Water	3/16/2009	Sr-90	1.10	-0.63 $\pm$ 0.44	1
SPAP-902	Air Filter	3/23/2009	Gr. Beta	0.003	0.006 $\pm$ 0.002	3.2
SPAP-904	Air Filter	3/23/2009	Cs-134	1.68	-	100
SPAP-904	Air Filter	3/23/2009	Cs-137	2.62	-	100
SPW-32709	Water	3/23/2009	Ni-63	2.84	1.37 $\pm$ 1.75	20
SPF-821	Fish	4/7/2009	Cs-134	3.12	-	100
SPF-821	Fish	4/7/2009	Cs-137	3.93	-	100
W-40909	Water	4/9/2009	Gr. Alpha	0.40	-0.25 $\pm$ 0.26	1
W-40909	Water	4/9/2009	Gr. Beta	0.77	-0.30 $\pm$ 0.53	3.2
SPW-12651	Water	4/10/2009	Ra-228	0.77	0.77 $\pm$ 0.45	2
SPW-1268	Water	4/10/2009	U-238	0.11	0.24 $\pm$ 0.17	1
W-42809	Water	4/28/2009	Ra-226	0.04	0.09 $\pm$ 0.04	1
SPMI-2186	Milk	5/12/2009	Sr-90	0.43	0.52 $\pm$ 0.26	1
SPMI-2187	Milk	5/12/2009	Cs-134	3.61	-	10
SPMI-2187	Milk	5/12/2009	Cs-137	3.13	-	10
SPMI-2187	Milk	5/12/2009	I-131	0.15	-0.02 $\pm$ 0.10	0.5
SPMI-2187	Milk	5/12/2009	I-131(G)	3.77	-	20
SPW-2498	Water	5/27/2009	Ni-63	1.60	0.00 $\pm$ 0.97	20

TABLE A-4. In-House "Blank" Samples

Lab Code	Sample Type	Date	Analysis <sup>b</sup>	Concentration (pCi/L) <sup>a</sup>			Acceptance Criteria (4.66 σ)
				Laboratory results (4.66σ)		Activity <sup>c</sup>	
				LLD			
SPW-3497	Water	7/15/2009	Ni-63	1.55	-0.24	± 0.94	20
SPW-3500	Water	7/15/2009	Tc-99	0.90	-1.71	± 0.53	10
SPMI-3589	Milk	7/17/2009	I-131(G)	5.75	-		20
SPAP-3594	Air Filter	7/17/2009	Cs-134	1.14	-		100
SPAP-3594	Air Filter	7/17/2009	Cs-137	2.47	-		100
SPF-3596	Fish	7/17/2009	Co-60	5.00	-		100
SPF-3596	Fish	7/17/2009	Cs-134	8.00	-		100
SPF-3596	Fish	7/17/2009	Cs-137	11.50	-		100
SPW-3598	Water	7/17/2009	H-3	148.40	0.69	± 73.60	200
SPW-12653	Water	8/3/2009	Ra-228	0.76	1.46	± 0.51	2
W-80709	Water	8/7/2009	Ra-226	0.04	0.08	± 0.03	1
W-81009	Water	8/10/2009	Gr. Alpha	0.44	0.08	± 0.31	1
W-81009	Water	8/10/2009	Gr. Beta	0.75	-0.31	± 0.52	3.2
W-100109	Water	10/1/2009	Ra-226	0.04	0.09	± 0.03	1
W-102709	Water	10/27/2009	Gr. Alpha	0.38	0.33	± 0.30	1
W-102709	Water	10/27/2009	Gr. Beta	0.81	-0.59	± 0.55	3.2
SPW-5965	Water	10/28/2009	U-238	0.15	0.09	± 0.13	1
SPW-12657	Water	11/6/2009	Ra-228	0.86	0.80	± 0.50	2
SPAP-6769	Air Filter	12/14/2009	Gr. Beta	0.003	0.010	± 0.002	3.2
SPAP-6773	Air Filter	12/14/2009	Cs-137	1.31	-		100
SPF-6775	Fish	12/14/2009	Cs-134	5.70	-		100
SPF-6775	Fish	12/14/2009	Cs-137	4.18	-		100
SPW-6777	Water	12/14/2009	Ni-63	2.29	0.25	± 1.38	20
SPW-6779	Water	12/14/2009	Tc-99	1.16	-0.98	± 0.69	10
SPMI-6781	Milk	12/14/2009	Cs-134	2.62	-		10
SPMI-6781	Milk	12/14/2009	Cs-137	3.29	-		10
SPMI-6781	Milk	12/14/2009	I-131(G)	2.65	-		20
SPW-6783	Water	12/14/2009	Cs-134	2.18	-		10
SPW-6783	Water	12/14/2009	Cs-137	2.90	-		10
SPW-6783	Water	12/14/2009	I-131(G)	2.30	-		20

<sup>a</sup> Liquid sample results are reported in pCi/Liter, air filters( pCi/filter), charcoal (pCi/charcoal canister), and solid samples (pCi/kg).

<sup>b</sup> I-131(G); iodine-131 as analyzed by gamma spectroscopy.

<sup>c</sup> Activity reported is a net activity result. For gamma spectroscopic analysis, activity detected below the LLD value is not reported.

TABLE A-5. In-House "Duplicate" Samples

Concentration (pCi/L) <sup>a</sup>							
Lab Code	Date	Analysis	Averaged				Acceptance
			First Result	Second Result	Result		
AP-7464, 7465	1/1/2009	Be-7	0.063 ± 0.012	0.065 ± 0.010	0.064 ± 0.008	Pass	
E-20, 21	1/5/2009	K-40	1.34 ± 0.21	1.13 ± 0.13	1.24 ± 0.12	Pass	
CF-67, 68	1/5/2009	Be-7	0.34 ± 0.12	0.39 ± 0.08	0.37 ± 0.07	Pass	
CF-67, 68	1/5/2009	Gr. Beta	4.34 ± 0.11	4.38 ± 0.12	4.36 ± 0.08	Pass	
CF-67, 68	1/5/2009	K-40	3.16 ± 0.26	3.00 ± 0.16	3.08 ± 0.15	Pass	
DW-90010, 90011	1/9/2009	Ra-226	2.97 ± 0.22	2.76 ± 0.21	2.87 ± 0.15	Pass	
DW-90010, 90011	1/9/2009	Ra-228	3.13 ± 0.71	3.55 ± 0.81	3.34 ± 0.54	Pass	
SG-198, 199	1/23/2009	Gr. Alpha	101.90 ± 6.50	101.70 ± 6.10	101.80 ± 4.46	Pass	
SG-198, 199	1/23/2009	Gr. Beta	97.80 ± 3.50	94.00 ± 3.20	95.90 ± 2.37	Pass	
SW-308, 309	1/27/2009	Gr. Beta	1.43 ± 0.58	1.41 ± 0.54	1.42 ± 0.40	Pass	
LW-330, 331	1/27/2009	Gr. Beta	2.09 ± 0.58	2.33 ± 0.63	2.21 ± 0.43	Pass	
SW-308, 309	1/29/2009	Gr. Beta	1.51 ± 0.56	1.61 ± 0.57	1.56 ± 0.40	Pass	
DW-375, 376	2/4/2009	Gr. Beta	2.72 ± 0.65	3.06 ± 0.69	2.89 ± 0.47	Pass	
SWU-606, 607	2/24/2009	Gr. Beta	2.66 ± 0.68	2.16 ± 0.67	2.41 ± 0.48	Pass	
U-651, 652	2/27/2009	Beta-K40	3.90 ± 2.30	1.70 ± 2.50	2.80 ± 1.70	Pass	
U-651, 652	2/27/2009	H-3	597.00 ± 292.00	507.00 ± 288.00	552.00 ± 205.07	Pass	
SG-739, 740	3/2/2009	Ra-226	8.20 ± 0.20	8.30 ± 0.20	8.25 ± 0.14	Pass	
MI-875, 876	3/17/2009	K-40	1286.50 ± 111.60	1471.70 ± 111.50	1379.10 ± 78.88	Pass	
MI-875, 876	3/17/2009	Sr-90	0.67 ± 0.31	0.36 ± 0.36	0.52 ± 0.24	Pass	
WW-970, 971	3/24/2009	Gr. Beta	13.59 ± 2.32	17.33 ± 2.69	15.46 ± 1.78	Pass	
XWW-980, 981	3/24/2009	H-3	7143.00 ± 262.00	7262.00 ± 264.00	7202.50 ± 185.97	Pass	
AP-1441, 1442	3/30/2009	Be-7	0.076 ± 0.012	0.075 ± 0.014	0.076 ± 0.009	Pass	
SWT-1123, 1124	3/31/2009	Gr. Beta	1.40 ± 0.55	1.86 ± 0.62	1.63 ± 0.41	Pass	
WW-1102, 1103	4/1/2009	Gr. Beta	2.13 ± 1.34	2.30 ± 1.32	2.22 ± 0.94	Pass	
XWW-1174, 1175	4/1/2009	H-3	2814 ± 176	2787 ± 176	2801 ± 124	Pass	
AP-1462, 1463	4/2/2009	Be-7	0.085 ± 0.014	0.10 ± 0.016	0.091 ± 0.011	Pass	
SL-2024, 2025	5/4/2009	Be-7	0.80 ± 0.18	0.82 ± 0.13	0.81 ± 0.11	Pass	
SL-2024, 2025	5/4/2009	Gr. Beta	2.41 ± 0.19	2.68 ± 0.21	2.55 ± 0.14	Pass	
SL-2024, 2025	5/4/2009	K-40	1.20 ± 0.21	1.30 ± 0.15	1.25 ± 0.13	Pass	
SO-2045, 2046	5/4/2009	Gr. Alpha	6.22 ± 2.87	6.50 ± 3.26	6.36 ± 2.17	Pass	
SO-2045, 2046	5/4/2009	Gr. Beta	28.85 ± 3.15	30.39 ± 3.34	29.62 ± 2.30	Pass	
SO-2045, 2046	5/4/2009	Sr-90	0.036 ± 0.010	0.024 ± 0.010	0.030 ± 0.007	Pass	
mi-2251, 2252	5/14/2009	K-40	1220.60 ± 155.10	1455.50 ± 118.20	1338.05 ± 97.50	Pass	
mi-2381, 2382	5/19/2009	K-40	1472.50 ± 122.90	1412.80 ± 117.40	1442.65 ± 84.98	Pass	
SWT-2534, 2535	5/26/2009	Gr. Beta	1.12 ± 0.57	1.66 ± 0.58	1.39 ± 0.41	Pass	
G-2626, 2627	5/28/2009	Gr. Beta	6.32 ± 0.19	6.18 ± 0.19	6.25 ± 0.13	Pass	
G-2626, 2627	5/28/2009	K-40	4.13 ± 0.35	4.05 ± 0.34	4.09 ± 0.24	Pass	
WW-2732, 2733	6/1/2009	H-3	240.73 ± 93.21	190.39 ± 90.81	215.56 ± 65.07	Pass	

TABLE A-5. In-House "Duplicate" Samples

Concentration (pCi/L) <sup>a</sup>						
Lab Code	Date	Analysis	First Result	Second Result	Averaged Result	Acceptance
SO-3141, 3142	6/22/2009	Ac-228	1.07 ± 0.06	1.06 ± 0.05	1.07 ± 0.04	Pass
SO-3141, 3142	6/22/2009	Be-7	0.55 ± 0.14	0.62 ± 0.08	0.59 ± 0.08	Pass
SO-3141, 3142	6/22/2009	Bi-212	1.16 ± 0.17	1.14 ± 0.16	1.15 ± 0.12	Pass
SO-3141, 3142	6/22/2009	Bi-214	0.96 ± 0.03	1.01 ± 0.03	0.99 ± 0.02	Pass
SO-3141, 3142	6/22/2009	Cs-137	0.72 ± 0.07	0.76 ± 0.08	0.74 ± 0.05	Pass
SO-3141, 3142	6/22/2009	Pb-212	1.00 ± 0.02	1.03 ± 0.02	1.02 ± 0.01	Pass
SO-3141, 3142	6/22/2009	Pb-214	1.01 ± 0.03	1.04 ± 0.03	1.03 ± 0.02	Pass
SO-3141, 3142	6/22/2009	Pu-239/40	0.022 ± 0.008	0.030 ± 0.009	0.026 ± 0.006	Pass
SO-3141, 3142	6/22/2009	Th-232	0.51 ± 0.04	0.48 ± 0.05	0.50 ± 0.03	Pass
SO-3141, 3142	6/22/2009	Tl-208	0.35 ± 0.02	0.36 ± 0.02	0.36 ± 0.01	Pass
SO-3141, 3142	6/22/2009	U-233/4	0.16 ± 0.02	0.18 ± 0.02	0.17 ± 0.01	Pass
SO-3141, 3142	6/22/2009	U-238	0.14 ± 0.02	0.18 ± 0.03	0.16 ± 0.02	Pass
SG-3187, 3188	6/25/2009	Ac-228	11.07 ± 0.33	10.88 ± 0.33	10.97 ± 0.24	Pass
SG-3187, 3188	6/25/2009	Pb-214	26.54 ± 0.23	26.17 ± 0.25	26.36 ± 0.17	Pass
SL-3297, 3298	7/1/2009	Be-7	1.15 ± 0.13	1.15 ± 0.12	1.15 ± 0.09	Pass
SL-3297, 3298	7/1/2009	Gr. Beta	3.38 ± 0.23	3.37 ± 0.12	3.38 ± 0.13	Pass
SL-3297, 3298	7/1/2009	K-40	1.43 ± 0.18	1.50 ± 0.19	1.47 ± 0.13	Pass
AP-3944, 3945	7/1/2009	Be-7	0.064 ± 0.009	0.068 ± 0.010	0.066 ± 0.007	Pass
DW-90222, 90223	7/15/2009	Ra-226	5.36 ± 0.60	4.62 ± 0.51	4.99 ± 0.39	Pass
DW-90222, 90223	7/15/2009	Ra-228	2.91 ± 0.73	2.80 ± 0.70	2.86 ± 0.51	Pass
DW-90237, 90238	7/17/2009	Gr. Alpha	3.54 ± 0.99	4.22 ± 1.09	3.88 ± 0.74	Pass
F-3790, 3791	7/21/2009	K-40	1.10 ± 0.35	1.41 ± 0.44	1.26 ± 0.28	Pass
DW-90250, 90251	7/22/2009	Ra-226	14.58 ± 0.39	15.13 ± 0.40	14.86 ± 0.28	Pass
DW-90250, 90251	7/22/2009	Ra-228	6.71 ± 1.05	6.10 ± 1.01	6.41 ± 0.73	Pass
VE-3965, 3966	7/28/2009	K-40	1.48 ± 0.16	1.56 ± 0.19	1.52 ± 0.13	Pass
VE-4098, 4099	8/3/2009	Be-7	0.54 ± 0.16	0.58 ± 0.16	0.56 ± 0.11	Pass
VE-4098, 4099	8/3/2009	Gr. Beta	5.15 ± 0.17	5.07 ± 0.18	5.11 ± 0.12	Pass
VE-4098, 4099	8/3/2009	K-40	4.91 ± 0.49	5.17 ± 0.15	5.04 ± 0.26	Pass
SO-4325, 4326	8/14/2009	Be-7	0.59 ± 0.21	0.68 ± 0.28	0.64 ± 0.18	Pass
SO-4325, 4326	8/14/2009	Cs-137	0.29 ± 0.05	0.28 ± 0.05	0.28 ± 0.03	Pass
SO-4325, 4326	8/14/2009	K-40	13.41 ± 0.77	13.46 ± 0.80	13.43 ± 0.56	Pass
SG-4283, 4284	8/17/2009	Ac-228	7.16 ± 0.28	7.10 ± 0.26	7.13 ± 0.19	Pass
SG-4283, 4284	8/17/2009	Pb-214	6.27 ± 0.13	6.21 ± 0.13	6.24 ± 0.09	Pass
VE-4436, 4437	8/25/2009	K-40	2.28 ± 0.28	2.67 ± 0.26	2.48 ± 0.19	Pass
SL-4589, 4590	9/1/2009	Be-7	1.25 ± 0.22	1.25 ± 0.16	1.25 ± 0.14	Pass
SL-4589, 4590	9/1/2009	K-40	2.96 ± 0.30	2.70 ± 0.27	2.83 ± 0.20	Pass
AV-4882, 4883	9/8/2009	Be-7	0.93 ± 0.18	0.95 ± 0.17	0.94 ± 0.12	Pass
AV-4882, 4883	9/8/2009	K-40	2.50 ± 0.26	2.47 ± 0.29	2.49 ± 0.20	Pass

Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

TABLE A-5. In-House "Duplicate" Samples

Lab Code	Date	Analysis	Concentration (pCi/L) <sup>a</sup>					Acceptance
			First Result	Second Result	Averaged Result			
WW-4721, 4722	9/9/2009	H-3	19191.00 ± 404.00	18677.00 ± 399.00	18934.00 ± 283.91			Pass
WW-4903, 4904	9/11/2009	H-3	1075.00 ± 130.00	1281.00 ± 136.00	1178.00 ± 94.07			Pass
BS-5119, 5120	9/16/2009	Be-7	2067.50 ± 327.90	2225.40 ± 371.10	2146.45 ± 247.61			Pass
BS-5119, 5120	9/16/2009	Cs-137	86.24 ± 35.40	145.10 ± 31.54	115.67 ± 23.71			Pass
BS-5119, 5120	9/16/2009	K-40	16.85 ± 0.90	17.27 ± 0.79	17.06 ± 0.60			Pass
SS-5188, 5189	9/23/2009	Be-7	1.02 ± 0.31	1.04 ± 0.43	1.03 ± 0.26			Pass
SS-5188, 5189	9/23/2009	K-40	10.21 ± 0.65	9.94 ± 0.93	10.07 ± 0.57			Pass
AP-3944, 3945	9/29/2009	Be-7	0.09 ± 0.02	0.09 ± 0.02	0.09 ± 0.01			Pass
E-5251, 5252	10/1/2009	Gr. Beta	2.30 ± 0.10	2.10 ± 0.10	2.20 ± 0.07			Pass
E-5251, 5252	10/1/2009	K-40	1.18 ± 0.24	1.15 ± 0.18	1.17 ± 0.15			Pass
G-5272, 5273	10/1/2009	Be-7	3.31 ± 0.29	3.60 ± 0.26	3.46 ± 0.19			Pass
G-5272, 5273	10/1/2009	Gr. Alpha	19.81 ± 0.80	21.10 ± 0.74	20.46 ± 0.54			Pass
G-5272, 5273	10/1/2009	K-40	16.47 ± 0.75	17.00 ± 0.74	16.74 ± 0.53			Pass
F-5690, 5691	10/15/2009	H-3	8895.00 ± 250.00	9051.00 ± 252.00	8973.00 ± 177.49			Pass
F-5690, 5691	10/15/2009	K-40	3.62 ± 0.40	3.09 ± 0.48	3.36 ± 0.31			Pass
DW-90396, 90397	10/16/2009	Ra-226	0.54 ± 0.09	0.42 ± 0.08	0.48 ± 0.06			Pass
DW-90396, 90397	10/16/2009	Ra-228	1.44 ± 0.56	0.94 ± 0.51	1.19 ± 0.38			Pass
DW-90408, 90409	10/19/2009	Ra-226	0.99 ± 0.12	1.10 ± 0.14	1.05 ± 0.09			Pass
DW-90408, 90409	10/19/2009	Ra-228	2.76 ± 0.66	1.38 ± 0.92	2.07 ± 0.57			Pass
DW-90420, 90421	10/21/2009	Ra-226	1.95 ± 0.17	1.77 ± 0.15	1.86 ± 0.11			Pass
DW-90420, 90421	10/21/2009	Ra-228	3.10 ± 0.73	3.32 ± 0.80	3.21 ± 0.54			Pass
SG-5962, 5963	10/22/2009	Ac-228	16.39 ± 0.79	16.51 ± 0.63	16.45 ± 0.51			Pass
SG-5962, 5963	10/22/2009	Pb-214	18.03 ± 0.41	17.74 ± 0.42	17.89 ± 0.29			Pass
DW-90423, 90424	10/27/2009	Gr. Alpha	12.04 ± 1.68	15.28 ± 1.97	13.66 ± 1.29			Pass
ME-6116, 6117	11/3/2009	Gr. Beta	0.86 ± 0.03	0.83 ± 0.03	0.85 ± 0.02			Pass
ME-6116, 6117	11/3/2009	K-40	2.57 ± 0.08	2.65 ± 0.08	2.61 ± 0.06			Pass
F-6567, 6568	11/6/2009	Gr. Beta	2.72 ± 1.05	3.04 ± 0.92	2.88 ± 0.70			Pass
F-6567, 6568	11/6/2009	Sr-90	0.09 ± 0.03	0.12 ± 0.04	0.11 ± 0.02			Pass
W-6495, 6496	11/8/2009	H-3	2638.00 ± 173.00	2451.00 ± 168.00	2544.50 ± 120.57			Pass
WW-6313, 6314	11/9/2009	H-3	1514.00 ± 137.00	1483.00 ± 136.00	1498.50 ± 96.52			Pass
SWU-6611, 6612	11/24/2009	Gr. Beta	1.88 ± 0.60	1.67 ± 0.59	1.78 ± 0.42			Pass
DW-90446, 90447	12/30/2009	Ra-226	0.30 ± 0.10	0.54 ± 0.14	0.42 ± 0.09			Pass
DW-90446, 90447	12/30/2009	Ra-228	2.60 ± 0.64	2.65 ± 0.65	2.63 ± 0.46			Pass

Note: Duplicate analyses are performed on every twentieth sample received in-house. Results are not listed for those analyses with activities that measure below the LLD.

<sup>a</sup> Results are reported in units of pCi/L, except for air filters (pCi/Filter), food products, vegetation, soil, sediment (pCi/g).

TABLE A-6. Department of Energy's Mixed Analyte Performance Evaluation Program (MAPEP)<sup>a</sup>.

Lab Code <sup>c</sup>	Date	Analysis	Laboratory result	Concentration <sup>b</sup>		Control Limits <sup>d</sup>	Acceptance
				Known Activity			
STW-1170 <sup>f</sup>	01/01/09	Am-241	1.15 ± 0.06	0.64		0.45 - 0.83	Fail
STW-1170	01/01/09	Co-57	19.60 ± 0.40	18.90		13.20 - 24.60	Pass
STW-1170	01/01/09	Co-60	16.60 ± 0.30	17.21		12.05 - 22.37	Pass
STW-1170	01/01/09	Cs-134	20.40 ± 0.50	22.50		15.80 - 29.30	Pass
STW-1170 <sup>e</sup>	01/01/09	Cs-137	0.10 ± 0.20	0.00		0.00 - 1.00	Pass
STW-1170	01/01/09	Fe-55	51.60 ± 20.60	48.20		33.70 - 62.70	Pass
STW-1170	01/01/09	H-3	359.90 ± 33.90	330.90		231.60 - 430.20	Pass
STW-1170	01/01/09	Mn-54	15.00 ± 0.40	14.66		10.26 - 19.06	Pass
STW-1170	01/01/09	Ni-63	50.50 ± 3.25	53.50		37.45 - 69.55	Pass
STW-1170	01/01/09	Pu-238	1.17 ± 0.04	1.18		0.83 - 1.53	Pass
STW-1170	01/01/09	Pu-239/40	0.74 ± 0.03	0.85		0.60 - 1.11	Pass
STW-1170	01/01/09	Sr-90	7.87 ± 1.39	7.21		5.05 - 9.37	Pass
STW-1170	01/01/09	Tc-99	12.70 ± 0.80	14.46		10.12 - 18.80	Pass
STW-1170	01/01/09	U-233/4	2.78 ± 0.07	2.77		1.94 - 3.60	Pass
STW-1170	01/01/09	U-238	2.87 ± 0.07	2.88		2.02 - 3.74	Pass
STW-1170	01/01/09	Zn-65	14.00 ± 0.70	13.60		9.50 - 17.70	Pass
STW-1171	01/01/09	Gr. Alpha	0.56 ± 0.06	0.64		0.00 - 1.27	Pass
STW-1171	01/01/09	Gr. Beta	1.29 ± 0.05	1.27		0.64 - 1.91	Pass
STSO-1172 <sup>e</sup>	01/01/09	Co-57	0.00 ± 0.00	0.00		0.00 - 1.00	Pass
STSO-1172	01/01/09	Cs-134	458.60 ± 7.40	467.00		327.00 - 607.00	Pass
STSO-1172	01/01/09	Cs-137	652.30 ± 3.50	605.00		424.00 - 787.00	Pass
STSO-1172	01/01/09	K-40	636.40 ± 9.50	570.00		360.40 - 669.40	Pass
STSO-1172	01/01/09	Mn-54	346.40 ± 3.10	307.00		215.00 - 399.00	Pass
STSO-1172	01/01/09	Pu-238	28.60 ± 2.20	25.30		17.70 - 32.90	Pass
STSO-1172 <sup>e</sup>	01/01/09	Pu-239/40	0.50 ± 0.40	0.00		0.00 - 1.00	Pass
STSO-1172	01/01/09	Sr-90	180.60 ± 12.10	257.00		180.00 - 334.00	Pass
STSO-1172	01/01/09	U-233/4	152.20 ± 4.30	149.00		104.00 - 194.00	Pass
STSO-1172	01/01/09	U-238	154.90 ± 4.40	155.00		109.00 - 202.00	Pass
STSO-1172	01/01/09	Zn-65	268.30 ± 4.00	242.00		169.00 - 315.00	Pass
STVE-1173	01/01/09	Co-57	2.75 ± 0.11	2.36		1.65 - 3.07	Pass
STVE-1173 <sup>e</sup>	01/01/09	Co-60	0.06 ± 0.09	0.00		0.00 - 1.00	Pass
STVE-1173	01/01/09	Cs-134	3.49 ± 0.22	3.40		2.38 - 4.42	Pass
STVE-1173	01/01/09	Cs-137	1.01 ± 0.11	0.93		0.65 - 1.21	Pass
STVE-1173	01/01/09	Mn-54	2.52 ± 0.14	2.30		1.61 - 2.99	Pass
STVE-1173	01/01/09	Zn-65	1.52 ± 0.18	1.35		0.95 - 1.76	Pass

TABLE A-6. Department of Energy's Mixed Analyte Performance Evaluation Program (MAPEP)<sup>a</sup>.

Lab Code <sup>c</sup>	Date	Analysis	Laboratory result	Concentration <sup>b</sup>		Control Limits <sup>d</sup>	Acceptance
				Known Activity			
STAP-1174 <sup>g</sup>	01/01/09	Am-241	0.29 ± 0.03	0.21		0.14 - 0.27	Fail
STAP-1174	01/01/09	Co-57	1.25 ± 0.05	1.30		0.91 - 1.69	Pass
STAP-1174	01/01/09	Co-60	1.17 ± 0.06	1.22		0.85 - 1.59	Pass
STAP-1174	01/01/09	Cs-134	2.67 ± 0.14	2.93		2.05 - 3.81	Pass
STAP-1174	01/01/09	Cs-137	1.53 ± 0.08	1.52		1.06 - 1.98	Pass
STAP-1174	01/01/09	Mn-54	2.34 ± 0.09	2.27		1.59 - 2.95	Pass
STAP-1174 <sup>h</sup>	01/01/09	Sr-90	0.93 ± 0.14	0.64		0.45 - 0.83	Fail
STAP-1174	01/01/09	Zn-65	1.44 ± 0.14	1.36		0.95 - 1.77	Pass
STAP-1175	01/01/09	Gr. Alpha	0.22 ± 0.03	0.35		0.00 - 0.70	Pass
STAP-1175	01/01/09	Gr. Beta	0.36 ± 0.04	0.28		0.14 - 0.42	Pass
STSO-1188	07/01/09	Co-57	674.60 ± 9.00	586.00		410.00 - 762.00	Pass
STSO-1188	07/01/09	Co-60	356.40 ± 6.30	327.00		229.00 - 425.00	Pass
STSO-1188	07/01/09	Cs-134	0.20 ± 1.90	0.00		0.00 - 1.00	Pass
STSO-1188	07/01/09	Cs-137	767.50 ± 12.00	669.00		468.00 - 870.00	Pass
STSO-1188	07/01/09	K-40	433.00 ± 37.20	375.00		263.00 - 488.00	Pass
STSO-1188	07/01/09	Mn-54	931.60 ± 14.10	796.00		557.00 - 1035.00	Pass
STSO-1188	07/01/09	Pu-238	53.10 ± 9.00	63.20		44.20 - 82.20	Pass
STSO-1188	07/01/09	Pu-239/40	107.10 ± 12.60	116.30		81.40 - 151.20	Pass
STSO-1188 <sup>i</sup>	07/01/09	Sr-90	310.50 ± 12.20	455.00		319.00 - 592.00	Fail
STSO-1188	07/01/09	U-233/4	188.20 ± 11.90	209.00		146.00 - 272.00	Pass
STSO-1188	07/01/09	U-238	197.40 ± 12.20	217.00		152.00 - 282.00	Pass
STSO-1188	07/01/09	Zn-65	1433.90 ± 25.20	1178.00		825.00 - 1531.00	Pass
STAP-1189	07/01/09	Gr. Alpha	0.33 ± 0.04	0.66		0.00 - 1.32	Pass
STAP-1189	07/01/09	Gr. Beta	1.57 ± 0.07	1.32		0.66 - 1.98	Pass
STAP-1190	07/01/09	Am-241	0.01 ± 0.02	0.00		0.01 - 0.05	Pass
STAP-1190	07/01/09	Co-57	6.78 ± 0.27	6.48		4.54 - 8.42	Pass
STAP-1190	07/01/09	Co-60	1.06 ± 0.18	1.03		0.72 - 1.34	Pass
STAP-1190	07/01/09	Cs-134	0.01 ± 0.06	0.00		0.01 - 0.05	Pass
STAP-1190	07/01/09	Cs-137	1.49 ± 0.27	1.40		0.98 - 1.82	Pass
STAP-1190	07/01/09	Mn-54	6.00 ± 0.45	5.49		3.84 - 7.14	Pass
STAP-1190	07/01/09	Sr-90	0.79 ± 0.13	0.84		0.59 - 1.09	Pass
STAP-1190	07/01/09	Zn-65	4.55 ± 0.66	3.93		2.75 - 5.11	Pass
STVE-1190	07/01/09	Co-57	8.90 ± 0.60	8.00		5.60 - 10.40	Pass
STVE-1190	07/01/09	Co-60	2.50 ± 0.36	2.57		1.80 - 3.34	Pass
STVE-1190	07/01/09	Cs-134	0.01 ± 0.11	0.00		0.00 - 0.10	Pass
STVE-1190	07/01/09	Cs-137	2.42 ± 0.16	2.43		1.70 - 3.16	Pass
STVE-1190	07/01/09	Mn-54	8.35 ± 0.70	7.90		5.50 - 10.30	Pass
STVE-1190	07/01/09	Zn-65	0.01 ± 0.26	0.00		0.00 - 0.10	Pass



TABLE A-6. Department of Energy's Mixed Analyte Performance Evaluation Program (MAPEP)<sup>a</sup>.

Lab Code <sup>c</sup>	Date	Analysis	Laboratory result	Concentration <sup>b</sup>		Control Limits <sup>d</sup>	Acceptance
				Known Activity			
STW-1191	07/01/09	Gr. Alpha	0.88 ± 0.07	1.05		0.00 - 2.09	Pass
STW-1191	07/01/09	Gr. Beta	7.29 ± 0.10	7.53		3.77 - 11.30	Pass
STW-1192	07/01/09	Am-241	0.88 ± 0.08	1.04		0.73 - 1.35	Pass
STW-1192	07/01/09	Co-57	37.20 ± 1.50	36.60		25.60 - 47.60	Pass
STW-1192	07/01/09	Co-60	15.10 ± 0.90	15.40		10.80 - 20.00	Pass
STW-1192	07/01/09	Cs-134	30.30 ± 2.10	32.20		22.50 - 41.90	Pass
STW-1192	07/01/09	Cs-137	41.90 ± 1.80	41.20		28.80 - 53.60	Pass
STW-1192	07/01/09	Fe-55	54.50 ± 15.50	60.80		42.60 - 79.00	Pass
STW-1192	07/01/09	H-3	680.30 ± 33.60	634.10		443.90 - 824.30	Pass
STW-1192 <sup>e</sup>	07/01/09	Mn-54	0.01 ± 0.26	0.00		0.00 - 1.00	Pass
STW-1192	07/01/09	Ni-63	38.70 ± 2.60	44.20		30.90 - 57.50	Pass
STW-1192	07/01/09	Pu-238	0.02 ± 0.01	0.02		0.00 - 0.05	Pass
STW-1192	07/01/09	Pu-239/40	1.70 ± 0.10	1.64		1.15 - 2.13	Pass
STW-1192	07/01/09	Sr-90	12.90 ± 1.70	12.99		9.09 - 16.89	Pass
STW-1192	07/01/09	Tc-99	7.60 ± 0.40	10.00		7.00 - 13.00	Pass
STW-1192	07/01/09	Tc-99	7.60 ± 0.40	10.00		7.00 - 13.00	Pass
STW-1192	07/01/09	U-233/4	2.90 ± 0.10	2.96		2.07 - 3.85	Pass
STW-1192	07/01/09	U-238	3.00 ± 0.10	3.03		2.12 - 3.94	Pass
STW-1192	07/01/09	Zn-65	28.50 ± 2.40	26.90		18.80 - 35.00	Pass

<sup>a</sup> Results obtained by Environmental, Inc., Midwest Laboratory as a participant in the Department of Energy's Mixed Analyte Performance Evaluation Program, Idaho Operations office, Idaho Falls, Idaho

<sup>b</sup> Results are reported in units of Bq/kg (soil), Bq/L (water) or Bq/total sample (filters, vegetation).

<sup>c</sup> Laboratory codes as follows: STW (water), STAP (air filter), STSO (soil), STVE (vegetation).

<sup>d</sup> MAPEP results are presented as the known values and expected laboratory precision (1 sigma, 1 determination) and control limits as defined by the MAPEP.

<sup>e</sup> Included in the testing series as a "false positive".

<sup>f</sup> No errors were found in procedure or calculation. There was not enough sample for a reanalysis. Americium-241 in water was included in the ERA studies (Tbl. A-7) and also in the second round of MAPEP testing. Both analysis results were acceptable.

<sup>g</sup> One determination was eliminated from the average, due to poor recovery. Average of three determinations, 0.25 ± 0.03 pCi/filter.

<sup>h</sup> No reason was determined for the initial high results. The analysis was repeated; result of reanalysis; 0.54 ± 0.12 Bq/filter.

<sup>i</sup> Incomplete separation of strontium from calcium could result in a higher recovery percentage and consequently lower reported activity. The analysis was repeated; result of reanalysis 363.3 ± 28.6 Bq/kg.

TABLE A-7. Interlaboratory Comparison Crosscheck program, Environmental Resource Associates (ERA)<sup>a</sup>.

Lab Code <sup>b</sup>	Date	Analysis	Concentration (pCi/L)		ERA Result <sup>d</sup>	Control Limits	Acceptance
			Laboratory Result <sup>c</sup>				
STAP-1176	03/23/09	Am-241	47.20	± 3.10	55.4	32.4 - 76.0	Pass
STAP-1176	03/23/09	Co-60	543.60	± 8.90	490.0	379.0 - 612.0	Pass
STAP-1176	03/23/09	Cs-134	941.30	± 30.70	865.0	563.0 - 1070.0	Pass
STAP-1176	03/23/09	Cs-137	850.60	± 19.40	724.0	544.0 - 951.0	Pass
STAP-1176 <sup>e</sup>	03/23/09	Mn-54	0.00	± 0.00	0.0	0.0 - 0.0	Pass
STAP-1176	03/23/09	Pu-238	64.50	± 3.60	57.4	39.4 - 75.5	Pass
STAP-1176	03/23/09	Pu-239/40	88.50	± 4.20	78.2	56.7 - 101.0	Pass
STAP-1176	03/23/09	Sr-90	93.90	± 10.00	95.3	41.9 - 148.0	Pass
STAP-1176	03/23/09	U-233/4	50.00	± 2.47	53.5	33.7 - 79.3	Pass
STAP-1176	03/23/09	U-238	50.40	± 2.48	53.1	34.0 - 75.4	Pass
STAP-1176	03/23/09	Uranium	101.60	± 5.30	109.0	55.7 - 173.0	Pass
STAP-1176	03/23/09	Zn-65	237.30	± 23.70	185.0	128.0 - 256.0	Pass
STAP-1177	03/23/09	Gr. Alpha	76.30	± 3.47	63.8	33.1 - 96.0	Pass
STAP-1177	03/23/09	Gr. Beta	98.50	± 3.04	80.7	49.7 - 118.0	Pass
STSO-1178	03/23/09	Ac-228	1370.00	± 121.00	1330.0	860.0 - 1880.0	Pass
STSO-1178	03/23/09	Am-241	1853.00	± 185.50	1660.0	992.0 - 2130.0	Pass
STSO-1178	03/23/09	Bi-212	1449.00	± 308.80	1550.0	406.0 - 2310.0	Pass
STSO-1178	03/23/09	Bi-214	1355.00	± 66.20	1420.0	872.0 - 2050.0	Pass
STSO-1178	03/23/09	Co-60	7475.00	± 46.40	7520.0	5470.0 - 10100.0	Pass
STSO-1178	03/23/09	Cs-134	5073.00	± 74.70	5170.0	3330.0 - 6220.0	Pass
STSO-1178	03/23/09	Cs-137	5040.00	± 49.70	4970.0	3800.0 - 6460.0	Pass
STSO-1178	03/23/09	K-40	10884.00	± 292.70	11200.0	8060.0 - 15100.0	Pass
STSO-1178	03/23/09	Mn-54	0.00	± 0.00	0.0	0.0 - 20.0	Pass
STSO-1178	03/23/09	Pb-212	1259.00	± 28.40	1260.0	820.0 - 1780.0	Pass
STSO-1178	03/23/09	Pb-214	1464.00	± 56.80	1510.0	902.0 - 2260.0	Pass
STSO-1178	03/23/09	Pu-238	1853.00	± 185.50	1590.0	910.0 - 2240.0	Pass
STSO-1178	03/23/09	Pu-239/40	1516.50	± 168.30	1360.0	928.0 - 1800.0	Pass
STSO-1178	03/23/09	Sr-90	5270.90	± 290.20	5750.0	2080.0 - 9380.0	Pass
STSO-1178	03/23/09	U-233/4	1452.30	± 114.40	1600.0	1010.0 - 1990.0	Pass
STSO-1178	03/23/09	Uranium	3013.70	± 131.10	3270.0	1860.0 - 4410.0	Pass
STSO-1178	03/23/09	Zn-65	2083.00	± 59.00	1940.0	1540.0 - 2600.0	Pass

TABLE A-7. Interlaboratory Comparison Crosscheck program, Environmental Resource Associates (ERA)<sup>a</sup>.

Lab Code <sup>b</sup>	Date	Analysis	Concentration (pCi/L)		ERA Result <sup>d</sup>	Control Limits	Acceptance
			Laboratory Result <sup>c</sup>				
STVE-1179	03/23/09	Am-241	2849.70	± 237.60	3660.0	2090.0 - 5030.0	Pass
STVE-1179	03/23/09	Cm-244	808.00	± 85.70	954.0	470.0 - 1480.0	Pass
STVE-1179	03/23/09	Co-60	1546.80	± 31.60	1710.0	1160.0 - 2460.0	Pass
STVE-1179	03/23/09	Cs-134	1706.00	± 59.20	1880.0	1080.0 - 2600.0	Pass
STVE-1179	03/23/09	Cs-137	1940.50	± 44.80	1800.0	1320.0 - 2500.0	Pass
STVE-1179	03/23/09	K-40	30107.30	± 598.00	30800.0	22300.0 - 43700.0	Pass
STVE-1179	03/23/09	Mn-54	0.00	± 0.00	0.0	0.0 - 0.0	Pass
STVE-1179	03/23/09	Sr-90	6604.80	± 440.10	8860.0	4950.0 - 11800.0	Pass
STVE-1179	03/23/09	U-233/4	1718.00	± 128.90	2040.0	1400.0 - 2710.0	Pass
STVE-1179	03/23/09	U-238	1718.30	± 128.80	2020.0	1420.0 - 2550.0	Pass
STVE-1179	03/23/09	Uranium	3499.40	± 371.00	4150.0	2850.0 - 5360.0	Pass
STVE-1179	03/23/09	Zn-65	869.40	± 63.60	878.0	634.0 - 1200.0	Pass
STW-1180	03/23/09	Am-241	127.50	± 5.10	132.0	90.4 - 178.0	Pass
STW-1180	03/23/09	Co-60	1174.10	± 11.70	1230.0	1070.0 - 1450.0	Pass
STW-1180	03/23/09	Cs-134	742.20	± 18.30	790.0	584.0 - 907.0	Pass
STW-1180	03/23/09	Cs-137	887.50	± 14.00	913.0	776.0 - 1090.0	Pass
STW-1180	03/23/09	Fe-55	323.00	± 362.00	492.0	286.0 - 657.0	Pass
STW-1180	03/23/09	Mn-54	0.00	± 0.00	0.0	0.0 - 0.0	Pass
STW-1180	03/23/09	Pu-238	96.60	± 2.20	108.0	81.7 - 134.0	Pass
STW-1180	03/23/09	Pu-239/40	89.50	± 2.10	86.3	66.8 - 107.0	Pass
STW-1180	03/23/09	Sr-90	763.20	± 12.90	834.0	530.0 - 1120.0	Pass
STW-1180	03/23/09	U-233/4	95.00	± 1.80	96.6	72.8 - 124.0	Pass
STW-1180	03/23/09	U-238	97.40	± 1.80	95.8	73.2 - 119.0	Pass
STW-1180	03/23/09	Uranium	195.50	± 3.70	197.0	142.0 - 262.0	Pass
STW-1180	03/23/09	Zn-65	653.10	± 24.10	631.0	535.0 - 786.0	Pass

<sup>a</sup> Results obtained by Environmental, Inc., Midwest Laboratory as a participant in the crosscheck program for proficiency testing administered by Environmental Resources Associates, serving as a replacement for studies conducted previously by the Environmental Measurements Laboratory Quality Assessment Program (EML).

<sup>b</sup> Laboratory codes as follows: STW (water), STAP (air filter), STSO (soil), STVE (vegetation).

<sup>c</sup> Unless otherwise indicated, the laboratory result is given as the mean ± standard deviation for three determinations.

<sup>d</sup> Results are presented as the known values, expected laboratory precision (1 sigma, 1 determination) and control limits as provided by ERA.

<sup>e</sup> Included in the testing series as a "false positive". No activity expected.

<sup>f</sup> The analysis was repeated by leaching and total dissolution methods. Total dissolution yielded results within expected range.

Results of the reanalysis: U-233,4, 1655 ± 95 pCi/kg. U-238 1805 ± 97 pCi/kg.

## APPENDIX B

### DATA REPORTING CONVENTIONS

## Data Reporting Conventions

- 1.0. All activities, except gross alpha and gross beta, are decay corrected to collection time or the end of the collection period.

### 2.0. Single Measurements

Each single measurement is reported as follows:  $x \pm s$

where:  $x$  = value of the measurement;

$s$  = 2s counting uncertainty (corresponding to the 95% confidence level).

In cases where the activity is less than the lower limit of detection  $L$ , it is reported as:  $<L$ ,

where  $L$  = the lower limit of detection based on 4.66s uncertainty for a background sample.

### 3.0. Duplicate analyses

3.1 Individual results: For two analysis results;  $x_1 \pm s_1$  and  $x_2 \pm s_2$

Reported result:  $x \pm s$ ; where  $x = (1/2)(x_1 + x_2)$  and  $s = (1/2)\sqrt{s_1^2 + s_2^2}$

3.2. Individual results:  $<L_1, <L_2$  Reported result:  $<L$ , where  $L$  = lower of  $L_1$  and  $L_2$

3.3. Individual results:  $x \pm s, <L$  Reported result:  $x \pm s$  if  $x \geq L$ ;  $<L$  otherwise.

### 4.0. Computation of Averages and Standard Deviations

- 4.1 Averages and standard deviations listed in the tables are computed from all of the individual measurements over the period averaged; for example, an annual standard deviation would not be the average of quarterly standard deviations. The average  $\bar{x}$  and standard deviation  $s$  of a set of  $n$  numbers  $x_1, x_2, \dots, x_n$  are defined as follows:

$$\bar{x} = \frac{1}{n} \sum x \quad s = \sqrt{\frac{\sum (x - \bar{x})^2}{n - 1}}$$

- 4.2 Values below the highest lower limit of detection are not included in the average.
- 4.3 If all values in the averaging group are less than the highest LLD, the highest LLD is reported.
- 4.4 If all but one of the values are less than the highest LLD, the single value  $x$  and associated two sigma error is reported.
- 4.5 In rounding off, the following rules are followed:
- 4.5.1. If the number following those to be retained is less than 5, the number is dropped, and the retained numbers are kept unchanged. As an example, 11.443 is rounded off to 11.44.
- 4.5.2. If the number following those to be retained is equal to or greater than 5, the number is dropped and the last retained number is raised by 1. As an example, 11.445 is rounded off to 11.45.

## APPENDIX C

Maximum Permissible Concentrations  
of Radioactivity in Air and Water  
Above Background in Unrestricted Areas

Table C-1. Maximum permissible concentrations of radioactivity in air and water above natural background in unrestricted areas<sup>a</sup>.

Air (pCi/m <sup>3</sup> )		Water (pCi/L)	
Gross alpha	$1 \times 10^{-3}$	Strontium-89	8,000
Gross beta	1	Strontium-90	500
Iodine-131 <sup>b</sup>	$2.8 \times 10^{-1}$	Cesium-137	1,000
		Barium-140	8,000
		Iodine-131	1,000
		Potassium-40 <sup>c</sup>	4,000
		Gross alpha	2
		Gross beta	10
		Tritium	$1 \times 10^6$

<sup>a</sup> Taken from Table 2 of Appendix B to Code of Federal Regulations Title 10, Part 20, and appropriate footnotes. Concentrations may be averaged over a period not greater than one year.

<sup>b</sup> Value adjusted by a factor of 700 to reduce the dose resulting from the air-grass-cow-milk-child pathway.

<sup>c</sup> A natural radionuclide.

APPENDIX D  
REMP SAMPLING SUMMARY



Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Table 4.5 Radiological Environmental Monitoring Program Summary

Name of Facility	Davis-Besse Nuclear Power Station	Docket No.	50-346
Location of Facility	Ottawa, Ohio	Reporting Period	January-December, 2009
	( County, State )		

Sample Type (Units)	Type and Number of Analyses <sup>a</sup>	LLD <sup>b</sup>	Indicator Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Location with Highest Annual Mean		Control Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Number Non-Routine Results
				Location <sup>d</sup>	Mean (F) <sup>c</sup> Range <sup>c</sup>		
Airborne Particulates (pCi/m <sup>3</sup> )	GB 520	0.003	0.026 (312/312) (0.004-0.045)	T-12, Water Treatment Plant, 23.5 mi. WNW	0.026 (52/52) (0.013-0.046)	0.026 (208/208) (0.013-0.046)	0
	Sr-89	0.0018	< LLD	-	-	< LLD	0
	Sr-90	0.0011	< LLD	-	-	< LLD	0
	GS 40						
	Be-7	0.015	0.088 (24/24) (0.067-0.110)	T-9, Oak Harbor 6.8 mi. SW	0.094 (4/4) (0.079-0.103)	0.091 (16/16) (0.067-0.108)	0
	K-40	0.028	< LLD	-	-	< LLD	0
	Nb-95	0.0014	< LLD	-	-	< LLD	0
	Zr-95	0.0022	< LLD	-	-	< LLD	0
	Ru-103	0.0014	< LLD	-	-	< LLD	0
	Ru-106	0.0109	< LLD	-	-	< LLD	0
	Cs-134	0.0009	< LLD	-	-	< LLD	0
	Cs-137	0.0011	< LLD	-	-	< LLD	0
	Ce-141	0.0020	< LLD	-	-	< LLD	0
	Ce-144	0.0056	< LLD	-	-	< LLD	0
Airborne Iodine (pCi/m <sup>3</sup> )	I-131 520	0.07	< LLD	-	-	< LLD	0
TLD (Quarterly) (mR/91 days)	Gamma 351	1.0	16.3 (307/307) ( 7.0-28.1)	T-8, Farm 2.7 mi. WSW	25.5 (4/4) (22.3-28.1)	17.6 (44/44) ( 12.9-26.0)	0
TLD (Quarterly) (mR/91 days) (Shield)	Gamma 4	1.0	7.9 (4/4) ( 7.3-8.4)	-	-	None	0
TLD (Annual) (mR/365 days)	Gamma 87	1.0	57.9 (76/76) ( 32-84.0)	T-8, Farm 2.7 mi. WSW	84.0 (1/1)	62.0 (11/11) ( 44.7-82.7)	0
TLD (Annual) (mR/365 days) (Shield)	Gamma 1	1.0	26.8 (1/1)	-	-	None	0

Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Table 4.5 Radiological Environmental Monitoring Program Summary

Name of Facility		Davis-Besse Nuclear Power Station		Docket No.		50-346		
Location of Facility		Ottawa, Ohio		Reporting Period		January-December, 2009		
		( County, State )						
Sample Type (Units)	Type and Number of Analyses <sup>a</sup>	LLD <sup>b</sup>	Indicator Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Location with Highest Annual Mean		Control Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Number Non-Routine Results <sup>e</sup>	
				Location <sup>d</sup>	Mean (F) <sup>c</sup> Range <sup>c</sup>			
Milk (pCi/L)	I-131	12	0.4	none	-	-	< LLD	0
	Sr-89	12	0.7	none	-	-	< LLD	0
	Sr-90	12	0.7	none	T-24, Sandusky 21.0 mi. SE	0.8 (8/12) (0.7-1.0)	0.8 (8/12) (0.7-1.0)	0
	GS	12						
	K-40		100	none	T-24, Sandusky 21.0 mi. SE	1360 (12/12) (1231-1441)	1360 (12/12) (1231-1441)	0
	Cs-134		4.7					
	Cs-137		4.8	none	-	-	< LLD	0
	Ba-La-140		5.2	none	-	-	< LLD	0
(g/L)	Ca	12	0.50	none	T-24, Sandusky 21.0 mi. SE	1.16 (12/12) (0.90-1.35)	1.16 (12/12) (0.90-1.35)	0
(g/L)	K (stable)	12		none	T-24, Sandusky 21.0 mi. SE	1.57 (12/12) (1.42-1.67)	1.57 (12/12) (1.42-1.67)	0
(pCi/g)	Sr-90/Ca	12		none	T-24, Sandusky 21.0 mi. SE	0.65 (8/12) (0.60-0.80)	0.65 (8/12) (0.60-0.80)	0
(pCi/g)	Cs-137/K	12		none	-	-	< LLD	0
Ground Water (pCi/L)	GB (TR)	3	2.0	2.6 (3/3) (2.0-3.4)	T-226, Off-site roving location	2.7 (2/2) (2.0-3.4)	< LLD	
	H-3	3	330	< LLD	-	-	< LLD	0
	Sr-89	3	0.8	< LLD	-	-	< LLD	0
	Sr-90	3	0.7	< LLD	-	-	< LLD	0
	GS							
	Mn-54		15	< LLD	-	-	< LLD	0
	Fe-59		30	< LLD	-	-	< LLD	0
	Co-58		15	< LLD	-	-	< LLD	0
	Co-60		15	< LLD	-	-	< LLD	0
	Zn-65		30	< LLD	-	-	< LLD	0
	Zr-95		15	< LLD	-	-	< LLD	0
	Cs-134		10	< LLD	-	-	< LLD	0
	Cs-137		10	< LLD	-	-	< LLD	0
	Ba-La-140		15	< LLD	-	-	< LLD	0

**Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report**

**Table 4.5 Radiological Environmental Monitoring Program Summary**

Name of Facility	Davis-Besse Nuclear Power Station	Docket No.	50-346
Location of Facility	Ottawa, Ohio	Reporting Period	January-December, 2009
	( County, State )		

Sample Type (Units)	Type and Number of Analyses <sup>a</sup>	LLD <sup>b</sup>	Indicator Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Location with Highest Annual Mean		Control Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Number Non-Routine Results <sup>a</sup>
				Location <sup>d</sup>	Mean (F) <sup>c</sup> Range <sup>c</sup>		
Edible Meat (pCi/g wet)	GS 2						
	K-40	0.10	2.46 (1/1)	T-31, Onsite Roving location	2.46 (1/1)	2.30 (1/1)	0
	Nb-95	0.008	< LLD	-	-	< LLD	0
	Zr-95	0.016	< LLD	-	-	< LLD	0
	Ru-103	0.008	< LLD	-	-	< LLD	0
	Ru-106	0.057	< LLD	-	-	< LLD	0
	Cs-134	0.006	< LLD	-	-	< LLD	0
	Cs-137	0.006	< LLD	-	-	< LLD	0
	Ce-141	0.015	< LLD	-	-	< LLD	0
	Ce-144	0.073	< LLD	-	-	< LLD	0
Fruits and Vegetables (pCi/g wet)	Sr-89 3	0.004	< LLD	-	-	< LLD	0
	Sr-90 3	0.003	< LLD	-	-	< LLD	0
	I-131 3	0.009	< LLD	-	-	< LLD	0
	GS 3						
	K-40	0.50	1.30 (2/2) (1.07-1.52)	T-25, Farm 1.6 mi. S	1.52 (1/1)	1.16 (1/1)	0
	Nb-95	0.005	< LLD	-	-	< LLD	0
	Zr-95	0.012	< LLD	-	-	< LLD	0
	Cs-134	0.006	< LLD	-	-	< LLD	0
	Cs-137	0.007	< LLD	-	-	< LLD	0
	Ce-141	0.013	< LLD	-	-	< LLD	0
	Ce-144	0.052	< LLD	-	-	< LLD	0
Broad Leaf Vegetation (pCi/g wet)	Sr-89 9	0.007	< LLD	-	-	< LLD	0
	Sr-90 9	0.005	< LLD	-	-	< LLD	0
	I-131 9	0.017	< LLD	-	-	< LLD	0
	GS 9						
	K-40	0.50	1.90 (6/6) (1.48-2.13)	T-37, Farm Mkt. 13.0 mi. SW	2.05 (3/3) (1.48-2.65)	2.05 (3/3) (1.48-2.65)	0
	Nb-95	0.012	< LLD	-	-	< LLD	0
	Zr-95	0.021	< LLD	-	-	< LLD	0
	Cs-134	0.013	< LLD	-	-	< LLD	0
	Cs-137	0.015	< LLD	-	-	< LLD	0
	Ce-141	0.032	< LLD	-	-	< LLD	0
	Ce-144	0.11	< LLD	-	-	< LLD	0

# Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Table 4.5 Radiological Environmental Monitoring Program Summary

Name of Facility	Davis-Besse Nuclear Power Station	Docket No.	50-346
Location of Facility	Ottawa, Ohio	Reporting Period	January-December, 2009
	( County, State )		

Sample Type (Units)	Type and Number of Analyses <sup>a</sup>	LLD <sup>b</sup>	Indicator Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Location with Highest Annual Mean		Control Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Number Non-Routine Results <sup>a</sup>
				Location <sup>d</sup>	Mean (F) <sup>c</sup> Range <sup>c</sup>		
Animal / Wildlife Feed (pCi/g wet)	GS 3						
	Be-7	0.10	0.40 (2/2) (0.31-0.48)	T-31, Onsite Roving location	0.48 (1/1)	0.29 (1/1)	0
	K-40	0.10	4.40 (2/2) (3.74-5.06)	T-198, Toussaint Cr. 4.0 mi. WSW	5.06 (1/1)	4.52 (1/1)	0
	Nb-95	0.023	< LLD	-	-	< LLD	0
	Zr-95	0.028	< LLD	-	-	< LLD	0
	Ru-103	0.018	< LLD	-	-	< LLD	0
	Ru-106	0.10	< LLD	-	-	< LLD	0
	Cs-134	0.015	< LLD	-	-	< LLD	0
	Cs-137	0.017	< LLD	-	-	< LLD	0
	Ce-141	0.038	< LLD	-	-	< LLD	0
	Ce-144	0.11	< LLD	-	-	< LLD	0
Soil (pCi/g dry)	GS 10						
	Be-7	0.34	0.94 (3/6) (0.42-1.79)	T-8, Farm 2.7 mi. WSW	1.79 (1/1)	0.60 (1/4)	0
	K-40	0.10	15.48 (6/6) (4.26-23.56)	T-8, Farm 2.7 mi. WSW	23.56 (1/1)	19.05 (4/4) (14.75-21.96)	0
	Nb-95	0.062	< LLD	-	-	< LLD	0
	Zr-95	0.071	< LLD	-	-	< LLD	0
	Ru-103	0.044	< LLD	-	-	< LLD	0
	Ru-106	0.23	< LLD	-	-	< LLD	0
	Cs-134	0.029	< LLD	-	-	< LLD	0
	Cs-137	0.033	0.15 (4/6) (0.10-0.29)	T-8, Farm 2.7 mi. WSW	0.29 (1/1)	0.12 (3/4) (0.042-0.17)	0
	Ce-141	0.083	< LLD	-	-	< LLD	0
	Ce-144	0.20	< LLD	-	-	< LLD	0

**Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report**

**Table 4.5 Radiological Environmental Monitoring Program Summary**

Name of Facility	Davis-Besse Nuclear Power Station	Docket No.	50-346
Location of Facility	Ottawa, Ohio	Reporting Period	January-December, 2009
	( County, State )		

Sample Type (Units)	Type and Number of Analyses <sup>a</sup>	LLD <sup>b</sup>	Indicator Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Location with Highest Annual Mean		Control Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Number Non-Routine Results <sup>a</sup>
				Location <sup>d</sup>	Mean (F) <sup>c</sup> Range <sup>c</sup>		
Treated Surface Water (pCi/L)	GB (TR) 48	0.9	1.8 (23/24)	T-50, Erie WTP	1.8 (11/12)	1.5 (22/24)	0
	H-3 16	330	(0.9-2.7) < LLD	4.5 mi. SE	(1.0-2.7)	(0.9-2.8) < LLD	0
	Sr-89 16	1.3	< LLD	-	-	< LLD	0
	Sr-90 16	0.7	< LLD	-	-	< LLD	0
	GS 16						
	Mn-54 15	15	< LLD	-	-	< LLD	0
	Fe-59 30	30	< LLD	-	-	< LLD	0
	Co-58 15	15	< LLD	-	-	< LLD	0
	Co-60 15	15	< LLD	-	-	< LLD	0
	Zn-65 30	30	< LLD	-	-	< LLD	0
	Zr-Nb-95 15	15	< LLD	-	-	< LLD	0
	Cs-134 10	10	< LLD	-	-	< LLD	0
	Cs-137 10	10	< LLD	-	-	< LLD	0
	Ba-La-140 15	15	< LLD	-	-	< LLD	0
Untreated Surface Water (pCi/L)	GB (TR) 60	1.0	2.3 (34/36)	T-3, Site Boundary	2.4 (12/12)	2.0 (21/24)	0
	H-3 60	330	(1.1-4.6) 820 (2/36)	1.4 mi. ESE	(1.1-3.9)	(1.1-4.3)	0
			(739-901)	T-3, Site Boundary	901 (1/12)	< LLD	0
	Sr-89 20	1.2	< LLD	1.4 mi. ESE	-	< LLD	0
	Sr-90 20	0.7	< LLD	-	-	< LLD	0
	GS 60						
	Mn-54 15	15	< LLD	-	-	< LLD	0
	Fe-59 30	30	< LLD	-	-	< LLD	0
	Co-58 15	15	< LLD	-	-	< LLD	0
	Co-60 15	15	< LLD	-	-	< LLD	0
	Zn-65 30	30	< LLD	-	-	< LLD	0
	Zr-Nb-95 15	15	< LLD	-	-	< LLD	0
	Cs-134 10	10	< LLD	-	-	< LLD	0
	Cs-137 10	10	< LLD	-	-	< LLD	0
	Ba-La-140 15	15	< LLD	-	-	< LLD	0

# Davis-Besse Nuclear Power Station 2009 Annual Radiological Environmental Operating Report

Table 4.5 Radiological Environmental Monitoring Program Summary

Name of Facility	Davis-Besse Nuclear Power Station	Docket No.	50-346
Location of Facility	Ottawa, Ohio	Reporting Period	January-December, 2009
	( County, State )		

Sample Type (Units)	Type and Number of Analyses <sup>a</sup>	LLD <sup>b</sup>	Indicator Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Location with Highest Annual Mean		Control Locations Mean (F) <sup>c</sup> Range <sup>c</sup>	Number Non-Routine Results <sup>d</sup>
				Location <sup>d</sup>	Mean (F) <sup>c</sup> Range <sup>c</sup>		
Fish (pCi/g wet)	GB 6	0.10	4.38 (3/3) (3.78-5.15)	T-35, Lake Erie > 10 mi.	4.86 (3/3) (4.50-5.09)	4.86 (3/3) (4.50-5.09)	0
	GS 6						
	K-40	0.10	2.63 (3/3) (2.49-2.84)	T-35, Lake Erie > 10 mi.	2.69 (3/3) (2.29-3.00)	2.69 (3/3) (2.29-3.00)	0
	Mn-54	0.021	< LLD	-	-	< LLD	0
	Fe-59	0.106	< LLD	-	-	< LLD	0
	Co-58	0.034	< LLD	-	-	< LLD	0
	Co-60	0.018	< LLD	-	-	< LLD	0
	Zn-65	0.051	< LLD	-	-	< LLD	0
	Cs-134	0.014	< LLD	-	-	< LLD	0
	Cs-137	0.020	< LLD	-	-	< LLD	0
Shoreline Sediments (pCi/g dry)	GS 8						
	K-40	0.10	13.12 (6/6) (8.93-20.93)	T-132, Lake Erie 1.0 mi. E	14.93 (2/2) (8.93-20.93)	10.83 (2/2) (9.65-12.00)	0
	Mn-54	0.049	< LLD	-	-	< LLD	0
	Co-58	0.044	< LLD	-	-	< LLD	0
	Co-60	0.051	< LLD	-	-	< LLD	0
	Cs-134	0.046	< LLD	-	-	< LLD	0
	Cs-137	0.052	< LLD	-	-	< LLD	0

<sup>a</sup> GB = gross beta, GS = gamma scan.

<sup>b</sup> LLD = nominal lower limit of detection based on a 4.66 sigma counting error for background sample.

<sup>c</sup> Mean and range are based on detectable measurements only (i.e., >LLD) Fraction of detectable measurements at specified locations is indicated in parentheses (F).

<sup>d</sup> Locations are specified by station code (Table 4.1) and distance (miles) and direction relative to reactor site..

<sup>e</sup> Non-routine results are those which exceed ten times the control station value.



# **Lease No. 1**



U. S. GOVERNMENT LEASE  
FOR REAL PROPERTY

VOL 024 PL 289

1. THIS LEASE, made and entered into the 1st day of November in the year One Thousand Nine Hundred and Seventy-two, by and between THE TOLEDO EDISON COMPANY, of 300 Madison Avenue, Toledo, Ohio 43652, Owner of an undivided 420/800ths interest, and THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, P.O. Box 8000, Cleveland, Ohio 44101, Owner of an undivided 380/800ths interest, as tenants in common, their successors and assigns, hereinafter called the Lessors, and THE UNITED STATES OF AMERICA, hereinafter called the Lessee:

WITNESSETH: The parties hereto for the consideration of One Dollar (\$1.00) hereinafter covenant and agree as follows:

2. The Lessors hereby lease to the Lessee for management as a National Wildlife Refuge, the following described premises in Ottawa County, Ohio, viz:

PARCEL I

That part of Fractional Section 1, Town-7-North, Range-15-East, and that part of Fractional Sections 35 and 36, Town-8-North, Range-15-East, in Carroll Township, Ottawa County, Ohio, bounded and described as follows:

Commencing at a monument at the West 1/4 corner of said Fractional Section 1; thence North 01°-07'-14" West along the West line of said Fractional Section 1 a distance of 801.09 feet to an iron pipe; thence North 01°-31'-40" West along the said West line a distance of 203.07 feet to the point of BEGINNING; thence South 89°-47'-02" East a distance of 1022.87 feet to an iron pipe; thence South 00°-12'-58" West a distance of 183.36 feet to a point; thence North 89°-06'-38" East a distance of 321.19 feet to an iron pipe; thence North 51°-40'-51" East a distance of 2010 feet, more or less, to the shore of Lake Erie; thence Northwesterly along the shore of Lake Erie a distance of 960 feet, more or less, to its intersection with the extension Northeasterly of the Southeasterly line of Sand Beach, Plat 2 (a subdivision in Carroll Township, and recorded in Volume 5, Page 58, Ottawa County Plat Records); thence South 46°-43'-39" West and along the Southeasterly line of said Sand Beach, Plat 2 and passing through a concrete monument at 298 feet, more or less, for a total distance of 330 feet, more or less, to its intersection with the centerline of a dredge cut, which lies Southwesterly of and adjacent to Lot 330 of said Sand Beach, Plat 2; thence North 18°-30'-03" West along the centerline of said dredge cut a distance of 236.40 feet; thence continuing North 57°-34'-23" West along the centerline of said dredge cut a distance of 153.60 feet; thence continuing North 69°-12'-52" West along the centerline of said dredge cut a distance of 249.06 feet, more or less, to its intersection with a line that is 40 feet by rectangular measurement Northerly of and parallel to the North line of said Fractional Section 1; thence South 89°-16'-08" West along a line that is 40 feet by rectangular measurement Northerly of and parallel to the North line of said Fractional Section 1, a distance of 1205.98 feet, more or less, to an iron pipe on the West line of said Fractional Section 36; thence North 89°-49'-52" West along a line that is 40 feet by rectangular measurement Northerly of and parallel to the North line of said Fractional Section 1, a distance of 319.65 feet to an iron pipe that is 40 feet Northerly of the Northwest corner of said Fractional Section 1; thence

of 1762.31 feet to the true point of BEGINNING.

Containing 97.2 acres of land, more or less.

The above description is derived from Survey No. 788-70, made by G. M. Barton Survey Company, dated October 19, 1970.

#### PARCEL II

That part of Section 2, Town 7 North, Range 15 East; and that part of Fractional Section 35, Town 8 North, Range 15 East; and part of Sand Beach, Plat 3, in Carroll Township, Ottawa County, Ohio, bounded and described as follows:

Commencing at a monument at the East 1/4 corner of said Section 2; thence North 01°-07'-14" West along the East line of said Section 2, a distance of 801.09 feet to an iron pipe; thence North 01°-31'-40" West along the East line of said Section 2, a distance of 203.07 feet to the point of BEGINNING; thence North 30°-30'-48" West, a distance of 464.14 feet to an iron pipe; thence North 01°-31'-40" West parallel to the East line of the Northeast 1/4 of said Section 2, a distance of 750.00 feet to an iron pipe; thence North 59°-30'-25" West, a distance of 290.11 feet to an iron pipe; thence North 89°-46'-39" West, a distance of 2169.14 feet to a point on the centerline of State Route No. 2; thence Northwesterly along the centerline of State Route No. 2 and along a circular curve to the left, having a radius of 701.58 feet for an arc distance of 655.22 feet, the said arc subtending a central angle of 53°-30'-35", said last described point being 30.0 feet by rectangular measurement Southerly of the North line of the Northwest 1/4 of said Section 2; thence South 89°-46'-22" East along a line that is 30.0 feet by rectangular measurement Southerly of and parallel to the North line of the Northwest 1/4 of said Section 2, a distance of 488.71 feet to an iron pipe on the North and South centerline of said Section 2; thence South 89°-51'-52" East along a line that is 30.0 feet by rectangular measurement Southerly of and parallel to the North line of the Northeast 1/4 of said Section 2, a distance of 349.72 feet, more or less, to its intersection with a line drawn 30.0 feet Easterly of and parallel to the North and South centerline of said Fractional Section 35; thence North 00°-31'-08" East along a line that is 30.0 feet by rectangular measurement Easterly of and parallel to the North and South centerline of said Fractional Section 35, a distance of 104.85 feet to its intersection with the North line of Lot 408 of Sand Beach, Plat 3 (a subdivision in Carroll Township, and recorded in Volume 6, Page 21, Ottawa County Plat Records); thence South 89°-47'-52" East along the North line of Lots 408 and 413 of said Sand Beach, Plat 3, a distance of 248.27 feet to the Northeast corner of said Lot 413; thence South 00°-12'-08" West along the East line of said Lot 413, a distance of 34.85 feet to an iron pipe that is 40.0 feet by rectangular measurement North of the North line of the Northeast 1/4 of said Section 2; thence South 89°-47'-52" East along a line that is 40.0 feet by rectangular measurement Northerly of and parallel to the North line of the Northeast 1/4 of said Section 2 and along the North line of the Southerly 15.15 feet of Lots 465, 470, 513, 518, 559 and 564 of said Sand Beach, Plat 3, a distance of 1996.27 feet to an iron pipe that is 40.0 feet Northerly of the Northeast corner of said Section 2; thence South 00°-07'-44" West, a distance of 40.00 feet to the Northeast corner of said Section 2; thence South 01°-31'-40" East along the East line of said Section 2, a distance of 1762.31 feet to the true point of BEGINNING.

Containing 37.80 acres of land, more or less, but subject to legal

3. TO HAVE AND TO HOLD the said premises and their appurtenances for the purposes herein specified for the term of twenty-five (25) years beginning November 1, 1972, and ending October 31, 1997, unless the use of said lands for National Wildlife Refuge management purposes is terminated by the Lessee prior to that date.

4. The Lessee shall not assign this lease, in any event, and shall not sublet the demised premises.

5. The Lessors jointly and severally retain the right to construct, maintain and operate facilities on this property as needed for an electric generating plant of a type and size desired by Lessors, or either of them, and all transformers, lines, and other facilities incident to all of the foregoing and to the transporting of electricity therefrom. Lessors jointly and severally also reserve and except from this lease a perpetual right and easement to construct, maintain, use, repair, replace and remove on, over, under and across the above described premises, at such locations as desired by Lessors, or either of them, lines for the transmission and/or distribution of electric power and all matters incident thereto, of such type, construction and number as desired by Lessors, or either of them, together with the right to Lessors, or either of them, to cut, remove and keep clear trees and other obstructions along said lines and do all matters necessary or desirable incident to the exercise of all such rights. Lessee in exercising its rights hereunder shall not obstruct or interfere in any way with the construction, maintenance or use of any of Lessors' facilities or the facilities of either of them.

6. The entire lakeside barrier beach along the property hereby leased (during the term of this lease) as well as along the property described in the lease from The Title Guarantee & Trust Company, Trustee, to The United States of America dated November 1, 1968, recorded in Volume 23, Page 554, Record of Loans, Ottawa County, Ohio (during the term of that lease) shall be maintained by Lessors at its present elevation.

7. The property hereby leased will be operated as a National Wildlife Refuge and closed to all types of hunting. Entry upon the leased lands is authorized only for employees of the Lessors and the Lessee, and for others authorized or invited to enter on said premises by Lessors or Lessee in connection with the exercise of their respective rights and interests in the leased premises. Lessors jointly and severally shall have the right to construct driveways and ditch crossings incident thereto for ingress and egress through said premises. In the event it becomes necessary during the course of the operation of Lessors' generating plant or plants, or the plant or plants of either of them, due to an emergency situation, Lessors, or either of them, shall have the right of complete control of all personnel or other persons who are permitted on the property hereby leased and on the property leased to Lessee by said lease dated November 1, 1968, including their complete exclusion, if necessary, for limited periods.

8. The erection and maintenance of National Wildlife Refuge boundary posting will be the responsibility of the Lessee.

9. The right, title and interest of Lessors, and each of them, jointly or severally, in and to the leased premises and under this lease shall at all times be freely assignable and mortgageable, in whole or in any fractional part or parts, by Lessors, and each of them, jointly or severally, and Lessors' successors and assigns, or the successors and assigns of either of them, without any approval by Lessee.

IN WITNESS WHEREOF, the Lessors and Lessee have hereunto set their

as of  
hands the day and year first above written.

Signed, Sealed and Acknowledged  
in the Presence of:

Patricia A. Parker  
Anna Mae Ferguson

Signed, Sealed and Acknowledged  
in the Presence of:

William Hymne  
Kathy B. Langer

Signed, Sealed and Acknowledged  
in the Presence of:

Joseph F. Hatcher  
Joseph F. Hatcher

THE TOLEDO EDISON COMPANY

By J. O. Williams  
Its Vice President

Attest D. G. Nicholson  
Its Secretary

THE CLEVELAND ELECTRIC ILLUMINATING  
COMPANY

By Lee C. Howley  
Its Vice President

Attest Donald B. Matthews  
Its Assistant Secretary

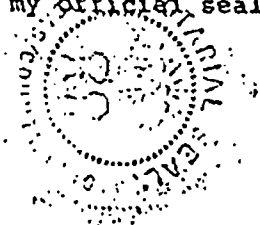
THE UNITED STATES OF AMERICA

By James S. Roberts  
Regional Director, Bureau of Sport  
Fisheries and Wildlife, Department  
of the Interior

STATE OF OHIO )  
COUNTY OF LUCAS ) SS

Before me, a notary public in and for said county, personally appeared J. O. Williams and D. G. Nicholson, to me known and known to me to be the persons who, as Vice President and Secretary, respectively, of THE TOLEDO EDISON COMPANY, the corporation which executed the foregoing instrument, signed the same and acknowledged to me that they did so sign said instrument in the name and on behalf of said corporation as such officers, respectively; that the same is their free act and deed as such officers, respectively, and the free and corporate act and deed of said corporation; that they were duly authorized thereunto by its board of directors; and that the seal affixed to said instrument is the corporate seal of said corporation.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal, this 3rd day of October, 1972.



Anna Mae Ferguson  
Notary Public  
ANNA MAE FERGUSON  
Notary Public, Lucas County, Ohio  
My Commission Expires Oct. 7, 1976.

STATE OF OHIO )  
COUNTY OF CUYAHOGA ) SS

Before me a notary public in and for said county, personally appeared Lee C. Howley and Donald B. Matthews, to me known and known to me to be the persons who, as Vice President and Assistant Secretary, respectively, of THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, the corporation which executed the foregoing instrument, signed the same and acknowledged to me that they did so sign said instrument in the name and on behalf of said corporation.

duly authorized thereunto by its board of directors; and that the seal affixed to said instrument is the corporate seal of said corporation.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal, this 13<sup>th</sup> day of OCTOBER, 1972.

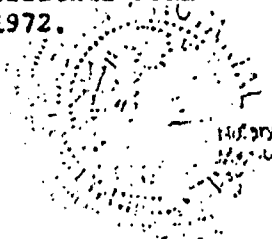
*William L. Deckman*  
Notary Public

WILLIAM L. DECKMAN, Attorney  
NOTARY PUBLIC - STATE OF OHIO  
My commission expires May 23, 1974.  
Section 14701 R.C.

STATE OF MINNESOTA )  
COUNTY OF HENNEPIN ) SS

I, *Gordon B. Jensen*, a notary public in and for Hennepin County, do hereby certify that *Charles L. Kube*, Regional Director, Bureau of Sport Fisheries and Wildlife, Department of the Interior, party to a certain lease bearing date of the 1<sup>st</sup> day of *November*, 1972, and hereto annexed, personally appeared before me in said Hennepin County, the said *Charles L. Kube*, Regional Director, being personally well known to me as (or proved by the oath of credible witnesses to be) the person and officer who executed the said lease, and acknowledged the same to be his act and deed, for the purposes therein expressed, and the seal thereto affixed is the seal of the Department of the Interior.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in Hennepin County, this 25<sup>th</sup> day of *October*, 1972.



GORDON B. JENSEN  
Notary Public, Hennepin County, Minn.  
My commission expires May 23, 1974.

*Gordon B. Jensen*  
Notary Public

Tolado Erben Co.		
Approved		
By	Name	Date
	<i>[Signature]</i>	9/27/72
	TJK	9/27/72
	FHR	10/5/72
	DB	9-26-72

Received: *Nov. 27* 1972  
at *10:30* o'clock *AM*

Recorded *Nov. 28* 1972  
in Ottawa County, Ohio Records

Volume *24* Page *259* Leases  
*Lease L. Williams*

# **Lease No. 2**

Received Nov. 18, 1968 at 2:40 P.M.  
Recorded Nov. 19, 1968 Vol. 23 Pg. 554  
James L. Williams Lease  
Recorder, Ottawa Co. OHIO GOVERNMENT LEASE

VOL 023 PG. 554

Lease # 2

34191

FOR REAL PROPERTY

1. THIS LEASE, made and entered into this 1st day of November, in the year one thousand nine hundred and sixty-eight by and between THE TITLE GUARANTEE AND TRUST COMPANY, Trustee, of 328 Erie Street, Toledo, in the County of Lucas and State of Ohio, their successors and assigns, hereinafter called the Lessor, and THE UNITED STATES OF AMERICA, hereinafter called the Lessee:

WITNESSETH: The parties hereto for the consideration of One Dollar (\$1.00) hereinafter covenant and agree as follows:

2. The Lessor hereby leases to the Lessee for management as a National Wildlife Refuge, the following-described premises in Ottawa County, Ohio, viz:

Township Seven (7) North, Range Fifteen (15) East, First Principal Meridian: Fractional section one (1), excepting that part lying northerly and westerly of a line described as follows: BEGINNING at a point on the west line of said fractional section one (1), N.  $1^{\circ}24'$  W., 12.098 chains from the west quarter corner thereof; thence N.  $89^{\circ}04'$  E., 20.354 chains parallel with the east-west centerline of said fractional section one (1); thence N.  $51^{\circ}47'$  E., 46.513 chains to the meander line of Lake Erie and there terminating, and also excepting from fractional section one (1) a tract described as BEGINNING at a monument at the west quarter corner of said section one (1); thence N.  $1^{\circ}24'$  W. along the west line of said section one (1), a distance of 798.47 feet; thence N.  $89^{\circ}04'$  E., a distance of 1,343.36 feet; thence S.  $1^{\circ}24'$  E., a distance of 2,500.00 feet; thence S.  $89^{\circ}04'$  W., a distance of 1,343.36 feet to a point on the west line of said section one (1); thence N.  $1^{\circ}24'$  W. along the west line of said section one (1), a distance of 1,701.53 feet to the point of BEGINNING; and in

Township Seven (7) North, Range Sixteen (16) East, First Principal Meridian: All fractional section six (6); in section seven (7), that part of the West Half fractional Northwest Quarter (W  $1/2$  frac. NW  $1/4$ ) described as follows: BEGINNING at the northwest corner of said section seven (7); thence N.  $89^{\circ}04'$  E., 19.879 chains with the north line thereof to the northeast corner of said West Half fractional Northwest Quarter (W  $1/2$  frac. NW  $1/4$ ); thence S.  $0^{\circ}34'$  E., 6.506 chains with the east line thereof; thence leaving said east line S.  $89^{\circ}04'$  W., 18.515 chains parallel with the north line of said West Half fractional Northwest Quarter (W  $1/2$  frac. NW  $1/4$ ); thence S.  $0^{\circ}34'$  E., 13.997 chains to the centerline of the Toussaint River; thence with said centerline S.  $58^{\circ}56'$  W., 1.583 chains to its intersection with the west line of section seven (7); thence with said west line, N.  $0^{\circ}34'$  W., 21.295 chains to the Point of BEGINNING.

3. TO HAVE AND TO HOLD the said premises and their appurtenances for the purposes herein specified for the term of fifty (50) years beginning January 1, 1969, and ending December 31, 2018, unless the use of said lands for National Wildlife Refuge management purposes is terminated by the Lessee prior to that date.

4. The Lessee shall not assign this lease, in any event, and shall not sublet the demised premises.

5. The Lessor retains the right to construct, maintain and operate facilities on this property as needed for an electric generating plant of a type and size desired by Lessor and all transformers, lines, and other facilities incident to all of the foregoing and to the transporting of electricity therefrom. There is excepted and excluded from the aforesaid leased lands a strip of land for a water intake channel and a strip of land for a water discharge channel, including embankments, service roads, and other facilities and matters incident thereto, all to be at such locations and of such dimensions and construction as desired by Lessor. The exact locations and descriptions for said strips of land for said channels have not yet been determined by Lessor. At the time of the final location of said strips of land Lessor shall furnish Lessee with a description thereof and same shall be affixed to and become a part of this lease. Lessor also reserves and excepts from this lease a perpetual right and easement to construct, maintain, use, repair, replace and remove on, over, under and across the above-described premises, at such locations as desired by Lessor, lines for the transmission and/or distribution of electric power and all matters incident thereto, of such type, construction and number as desired by Lessor, together with the right to Lessor to cut, remove and keep clear trees and other obstructions along said lines and do all matters necessary or desirable incident to the exercise of all such rights. Lessee in exercising its rights hereunder shall not obstruct or interfere in any way with the construction, maintenance or use of any of Lessor's channels or other facilities designated above.

6. The Lessor will purchase and completely install, ready for operation, three electric pumps adequate in the judgment of the Lessee to maintain optimum water levels in the waterfowl marshes. The Lessor will furnish the necessary power for pumping with the understanding that the Lessee will care for, operate, and maintain said pumps.

7. The property hereby leased will be operated as a National Wildlife Refuge and closed to all types of hunting. Entry upon the leased lands is authorized only for employees of the Lessor and the Lessee, and for others authorized or invited to enter on said premises by Lessor or Lessee in connection with the exercise of their respective rights and interests in the leased premises. Lessor shall have the right to construct driveways and ditch crossings incident thereto for ingress and egress through said premises.

8. The erection and maintenance of National Wildlife Refuge boundary posting will be the responsibility of the Lessee.

9. The right, title and interest of Lessor in and to the leased premises and under this lease shall at all times be freely assignable and mortgageable, in whole or in any fractional part or parts, by Lessor and Lessor's successors and assigns, without any approval by Lessee. Lessor proposes to convey the leased premises to The Toledo Edison Company and The Cleveland Electric Illuminating Company. Lessee agrees that when such conveyance is made and the obligations of Lessor are assumed by said Grantees, The Title Guarantee & Trust Company shall thereupon be fully and forever released and discharged from all obligations under this lease.



IN WITNESS WHEREOF, the Lessor and Lessee have hereunto set their hands the day and year first above written.

Signed, Sealed and Acknowledged  
in the Presence of:

William M. Burwell  
Ernest E. Cottrell

THE TITLE GUARANTEE AND TRUST COMPANY,  
Trustee

J. T. Bruch - President L.S.  
Ernest E. Cottrell - Sec. L.S.

Signed, Sealed and Acknowledged  
in the Presence of:

John L. Burwell  
Ernest E. Cottrell

THE UNITED STATES OF AMERICA

By R. W. Burwell  
Regional Director, Bureau of Sport  
Fisheries and Wildlife, Department  
of the Interior

STATE OF OHIO

COUNTY OF LUCAS

SS

Before me, a notary public in and for said county, personally appeared J. T. Bruch and Ernest E. Cottrell to me known and known to me to be the persons who, as president and secretary, respectively, of The Title Guarantee and Trust Company, Trustee, the corporation which executed the foregoing instrument, signed the same and acknowledged to me that they did so sign said instrument in the name and on behalf of said corporation as such officers, respectively; that the same is their free act and deed as such officers, respectively, and the free and corporate act and deed of said corporation; that they were duly authorized thereunto by its board of directors; and that the seal affixed to said instrument is the corporate seal of said corporation.

In testimony whereof, I have hereunto subscribed my name and affixed my official seal, this 1st day of November, 1968.

(Seal)

William M. Burwell  
Notary Public

STATE OF MINNESOTA

COUNTY OF HENNEPIN

SS

I, Gordon B. Jensen, a Notary Public in and for Hennepin County, do hereby certify that R. W. Burwell, Regional Director, Bureau of Sport Fisheries and Wildlife, Department of the Interior, party to a certain lease bearing date of the 1st day of November, 1968, and hereto annexed, personally appeared before me in said Hennepin County the said R. W. Burwell, Regional Director, being personally well known to me as (or proved by the oath of credible witnesses to be) the person and officer who executed the said lease, and acknowledged the same to be his act and deed, for the purposes therein expressed, and the seal thereto affixed is the seal of the Department of the Interior.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in Hennepin County, this 8th day of November, 1968.

(Seal)

Gordon B. Jensen  
Notary Public,

My commission expires Notary Public, Hennepin County, Minn. 1974

# **Lease No. 3**

Lease #3

U.S. GOVERNMENT LEASE  
FOR REAL PROPERTY

1. THIS LEASE, made and entered into the 18th day of May, in the year One Thousand Nine Hundred and Eighty-eight (1988), by and between THE TOLEDO EDISON COMPANY, 300 Madison Avenue, Toledo, Ohio, 43652, Owner of an undivided 420/800ths interest, and THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, 55 Public Square, Cleveland, Ohio, 44113, Owner of an undivided 380/800ths interest, as tenants in common, its successors and assigns, hereinafter called the Lessors, and THE UNITED STATES OF AMERICA, hereinafter called the Lessee:

WITNESSETH: The parties hereto for the consideration of One Dollar (\$1.00) hereinafter covenant and agree as follows:

2. The Lessors hereby lease to the Lessee for management as a National Wildlife Refuge, the following described premises in Ottawa County, Ohio, viz:

Parcel I

Being the North 1/2 of the North 1/2 of Section 12, Town 7 North, Range 15 East, Carroll Township, Ottawa County, Ohio, bounded and described as follows:

BEGINNING at the Northwest corner of the said North 1/2 of the North 1/2 of Section 12; thence North 88°-57'-23" East along the North line of said Section 12, a distance of 2649.62 feet to an iron pipe at the South 1/4 corner of Fractional Section 1; thence North 88°-58'-19" East continuing along the North line of said Section 12, a distance of 2649.61 feet to an iron pipe at the Northeast corner of said Section 12; thence South 00°-39'-41" East along the East line of said Section 12 and passing through a concrete monument at 1198.88 feet for a total distance of 1346.00 feet to the Southeast corner of the North 1/2 of the North 1/2 of said Section 12; thence South 89°-03'-33" West along the South line of the North 1/2 of the North 1/2 of said Section 12, a distance of 5310.85 feet to the Southwest corner of the North 1/2 of the North 1/2 of said Section 12; thence North 00°-09'-40" West

along the West line of said Section 12 and passing through a concrete monument at 334.26 feet for a total distance of 1337.31 feet to the point of BEGINNING.

Containing 163.4 acres of land, more or less.

Parcel II

That part of the Northwest 1/4 of Fractional Section 7, Town 7 North, Range 16 East, Carroll Township, Ottawa County, Ohio, bounded and described as follows:

Commencing at the Northwest corner of the said Fractional Section 7; thence North 89°-06'-40" East along the North line of the said Fractional Section 7, a distance of 1312.00 feet to an iron pipe and the TRUE POINT OF BEGINNING; thence South 02°-22'-38" East and passing through an iron pipe at 338.75 feet for a total distance of 429.80 feet; thence North 89°-23'-07" West, a distance of 1239.51 feet to an iron pipe; thence South 00°-39'-41" East, a distance of 961.70 feet, more or less, to the centerline of the Toussaint River; thence in a Northeasterly direction along the said centerline of the Toussaint River, a distance of 1800.00 feet, more or less, to its intersection with the extension Southerly of the shore line of Lake Erie; thence Northerly along the extension Southerly of the shore line of Lake Erie and along the shore line of Lake Erie, a distance of 700.00 feet, more or less, to its intersection with the North line of the said Fractional Section 7; thence South 89°-06'-40" West along the North line of said Fractional Section 7, a distance of 350.00 feet, more or less, to the point of BEGINNING.

Containing 25.00 acres of land, more or less.

The above descriptions for Parcels I and II are derived from Survey No. 787-70, made by G. M. Barton Survey Company, dated July, 1968, and October, 1970.

3. TO HAVE AND TO HOLD the said premises and their appurtenances for the purposes herein specified for the term of thirty (30) years beginning January 1, 1988 and ending December 31, 2018, unless the use of said lands for National Wildlife Refuge management purposes is terminated by the Lessee prior to that date.

4. The Lessee shall not assign this lease, in any event, and shall not sublet the demised premises.

5. The Lessors jointly and severally retain the right to construct, maintain and operate facilities on this property as needed for an electric generating plant of a type and size desired by Lessors, or either of them, and all transformers, lines, and other facilities incident to all of the foregoing and for the transporting of electricity therefrom. Lessors jointly and severally also reserve and except from this lease a perpetual right and easement to construct, maintain, use, repair, replace and remove on, over, under and across the above-described premises, at such locations as desired by Lessors, or either of them, lines for the transmission and/or distribution of electric power and all matters incident thereto, of such type, construction and number as desired by Lessors, or either of them, together with the right to Lessors, or either of them, to cut, remove and keep clear trees and other obstructions along said lines and do all matters necessary or desirable incident to the exercise of all such rights. Lessee in exercising its rights hereunder shall not obstruct or interfere in any way with the construction, maintenance or use of any of Lessors' facilities or the facilities of either of them.

6. The property hereby leased will be operated as a National Wildlife Refuge and closed to all types of hunting. Entry upon the leased lands is authorized only for employees of the Lessors and the Lessee, and for others authorized or invited to enter on said premises by Lessors or Lessee in connection with the exercise of their respective rights and interests in the leased premises. Lessors jointly and severally shall have the right to construction driveways and ditch crossings incident thereto for ingress and egress through said premises. In the event it

becomes necessary during the course of the operation of Lessors' generating plant or plants, or the plant or plants of either of them, due to an emergency situation, Lessors, or either of them shall have the right of complete control of all personnel or other persons who are permitted on the property hereby leased and on the property leased to Lessee by said leases dated November 1, 1968, and November 1, 1972, including their complete exclusion, if necessary, for limited periods.

7. The erection and maintenance of National Wildlife Refuge boundary posting will be the responsibility of the Lessee.

8. The right, title and interest of Lessors, and each of them, jointly or severally, in and to the leased premises and under this lease shall at all times be freely assignable and mortgageable, in whole or in any fractional part or parts by Lessors, and each of them, jointly or severally, and Lessors' successors and assigns, or the successors and assigns of either of them, without any approval by Lessee.

IN WITNESS WHEREOF, the Lessors and Lessee have hereunto set their hands as of the day and year first above written.

Signed, Sealed and Acknowledged  
in the Presence of:

THE TOLEDO EDISON COMPANY

X Laurel A. Hinkle X

LAUREL A. HINKLE

Notary Public, State of Ohio

My Commission Expires May 15, 1991

Kelly J. Butenwald

By:

Attest:

[Signature]

Signed, Sealed and Acknowledged  
in the Presence of:

THE CLEVELAND ELECTRIC  
ILLUMINATING COMPANY

David A. Burk

By: X *Alvin E. [Signature]*

Frank J. Gulif.

Attest: *Carl E. [Signature]*

Signed, Sealed and Acknowledged  
in the Presence of:

THE UNITED STATES OF AMERICA

Rosemary B. Little

By: *John [Signature]*

Wayne Engler

STATE OF OHIO )  
                  ) ss:  
COUNTY OF LUCAS)

Before me, a notary public in and for said county, personally appeared Donald C. Shelton and Jennifer M. Shriver to me known and known to me to be the persons who, as Vice President, Nuclear and Secretary, respectively, of THE TOLEDO EDISON COMPANY, the corporation which executed the foregoing instrument, signed the same and acknowledged to me that they did so sign said instrument in the name and on behalf of said corporation as such officers, respectively; that the same is their free act and deed as such officers, respectively, and the free and corporate act and deed of said corporation; that they were duly authorized thereunto by its board of directors; and that the seal affixed to said instrument is the corporate seal of said corporation.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal this 4<sup>TH</sup> day of JANUARY, 1988.

*William F. [Signature]*  
Notary Public

**NOTARY PUBLIC**  
My Commission Expires 1-16-91

STATE OF OHIO           )  
                                  )ss:  
COUNTY OF CUYAHOGA)

Before me a notary public in and for said county, personally appeared ALVIN KAPLAN and CARL E. CHANCELLOR, to me known and known to me to be the persons who, as VICE PRESIDENT and SECRETARY - GENERAL COUNSEL, respectively, of THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, the corporation which executed the foregoing instrument, signed the same and acknowledged to me that they did so sign said instrument in the name and on behalf of said corporation as such officers, respectively; that the same is their free act and deed as such officers, respectively, and the free and corporate act and deed of said corporation; that they were duly authorized thereunto by its board of directors; and that the seal affixed to said instrument is the corporate seal of said corporation.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my official seal this 13<sup>th</sup> day of JANUARY, 1988.

David C. Burke  
Notary Public  
MY COMMISSION DOES NOT EXPIRE

STATE OF Minnesota           )  
                                  )ss:  
COUNTY OF Hennepin           )

I, Rosemary T. Little, a notary public in and for Dakota County, do hereby certify that John Popowski Acting, Regional Director, U.S. Fish and Wildlife Service, Department of the Interior, party to a certain lease bearing date of the 1st day of November, 1972 and hereto annexed, personally appeared before me in said Hennepin County, the said John Popowski, Acting, Regional Director, being personally well known to me as (or proved by the oath of credible witnesses to be) the person and officer who executed the said lease, and acknowledged the same to be his act and deed, for the purposes therein expressed, and the seal thereto affixed is the seal of the Department of the Interior.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in Hennepin County this 18th day of May, 1988.

Rosemary T. Little  
Notary Public





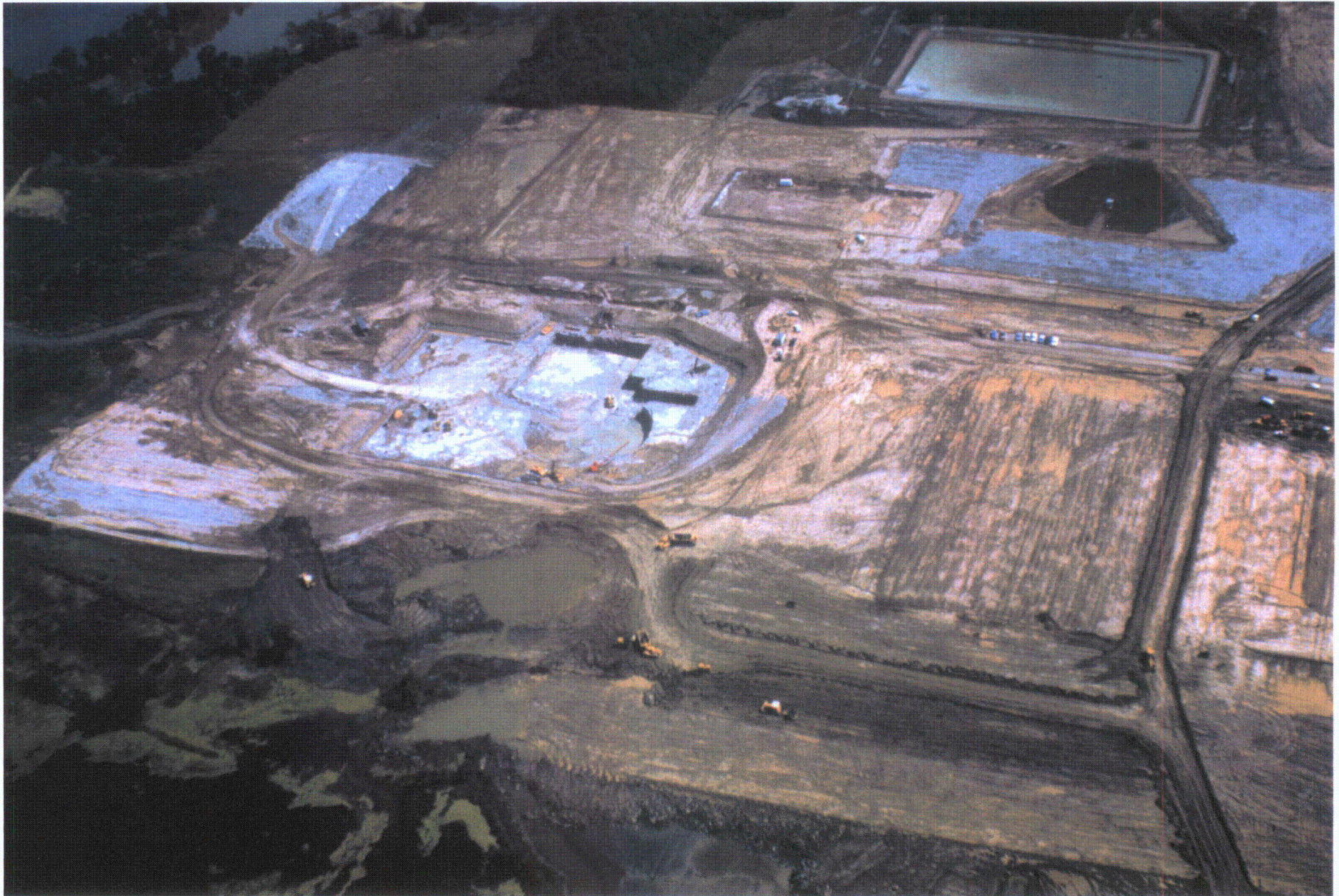
**S 6      Formal documentation for land swap agreement (if there is one)**

No land swap agreements were located for the Davis-Besse Station property.









No buildings, just dirt





Return Canal





Containment with cooling tower basin in background





Site with some structures near completion





**Site with some structures near completion**

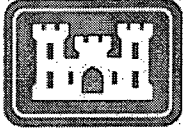




**C 2      Draft Final Preliminary Assessment Report: Locust Point Anti-Aircraft Artillery Firing Area, FUDS Property No. G050H0996, Nov 2010, 2 volumes, prepared by Shaw Environmental for Army Corps of Engineers. Request for Docket.**

Volume 1 (Main Body) of this document is provided in hard copy following this page.

Volume 1 (Main Body) & Volume 2 (Attachments) are provided on Compact Disk at the end of this tabbed section due to the size (>2000 pages) of Volume 2.



**US Army Corps  
of Engineers®**  
*BUILDING STRONG®*

---

**Draft Final Preliminary Assessment Report  
Locust Point Anti-Aircraft Artillery Firing Area  
FUDS Property No. G05OH0996**

**Contract No. W912QR-08-D-0013  
Task Order No. DN01**

**November 2010**



**Shaw®** Shaw Environmental, Inc.

5050 Section Avenue  
Cincinnati, OH 45212

DRAFT FINAL

PRELIMINARY ASSESSMENT REPORT  
**Locust Point Anti-Aircraft Artillery Firing Area**  
FUDS Property No. G05OH0996

Formerly Used Defense Sites  
Military Munitions Response Program

November 2010

Prepared For:

U.S. Army Corps of Engineers  
Buffalo District  
1776 Niagara Street  
Buffalo, New York

Prepared By:

Shaw Environmental & Infrastructure, Inc.  
5050 Section Avenue  
Cincinnati, Ohio 45212

Contract No. W912QR-08-D-0013  
Task Order No. DN01

## Table of Contents

---

List of Tables .....	iii
List of Appendices .....	iv
Executive Summary .....	ES-1
Acknowledgements .....	ES-3
1.0 Introduction .....	1-1
1.1 Project Authorization .....	1-1
1.2 Purpose and Objectives of the Preliminary Assessment .....	1-1
1.3 Preliminary Assessment Report Content .....	1-2
2.0 Previous Investigations .....	2-1
2.1 Inventory Project Report/Preliminary Assessment (USACE, 1991) .....	2-1
2.2 Archives Search Report (USACE, 1993) .....	2-1
2.3 Final Removal Report (Human Factors Application Inc., 1996) .....	2-1
2.4 Archives Search Report Supplement (USACE, 2004b) .....	2-2
2.5 Final Report (Environmental Security Technology Certification Program, 2007) .....	2-2
2.6 Final Site Investigation Report Erie Army Depot (Shaw, 2008) .....	2-3
2.7 Findings and Determination of Eligibility (USACE, 2009a) .....	2-3
2.8 Other Investigations .....	2-3
3.0 Property Description, Acreage, and Land Use .....	3-1
3.1 Location .....	3-1
3.2 FUDS Eligible Property .....	3-1
3.3 Land Use and Ownership History .....	3-2
3.3.1 Land Use .....	3-2
3.3.1.1 Historical Land Use Investigations .....	3-2
3.3.2 Ownership History .....	3-4
3.4 Physical Property Characteristics .....	3-5
3.4.1 Topography and Vegetation .....	3-5
3.4.2 Terrain Features .....	3-5
3.4.3 Climate .....	3-5
3.4.4 Regional Geologic and Hydrogeologic Setting .....	3-6
3.4.4.1 Bedrock Geology .....	3-6
3.4.4.2 Overburden Soils .....	3-6
3.4.4.3 Hydrogeology .....	3-6
3.4.5 Sensitive Environments .....	3-6
4.0 Historical Property Summary .....	4-1
4.1 Chronological Property Summary .....	4-1
4.2 Military Operations .....	4-2
4.2.1 Operations Involving Military Munitions .....	4-3
4.2.2 Operations Involving HTRW .....	4-3
4.3 Map Analysis .....	4-3
4.4 Aerial Photographic Interpretation .....	4-4
5.0 Evaluation of Presence of Military Munitions and Technical Data .....	5-1

5.1	General Evaluation of Conventional MEC Presence .....	5-1
5.2	General Evaluation of MC Presence .....	5-2
5.3	General Evaluation of RCWM Presence .....	5-2
5.4	Property Specific Locations .....	5-2
6.0	Evaluation of HTRW Presence and Areas .....	6-1
6.1	General Evaluation of HTRW Presence .....	6-1
6.2	Property Specific Locations .....	6-1
7.0	Evaluation of CON/HTRW and BD/DR Presence .....	7-1
7.1	Evaluation of CON/HTRW Presence and Areas .....	7-1
7.2	Evaluation of BD/DR .....	7-1
8.0	Pathway and Environmental Hazard Assessment .....	8-1
8.1	Ground Water Pathway .....	8-1
8.1.1	Hydrogeologic Setting .....	8-1
8.1.2	Ground Water Targets .....	8-1
8.1.3	Ground Water Conclusions .....	8-1
8.2	Surface Water Pathway .....	8-1
8.2.1	Hydrologic Setting .....	8-1
8.2.2	Surface Water Targets .....	8-2
8.2.3	Surface Water Conclusions .....	8-2
8.3	Soil Exposure and Air Pathways .....	8-2
8.3.1	Physical Conditions .....	8-2
8.3.2	Soil and Air Targets .....	8-2
8.3.2.1	Human Targets .....	8-2
8.3.2.2	Environmental Targets .....	8-3
8.3.3	Soil Exposure and Air Pathway Conclusions .....	8-3
9.0	Summary and Conclusions .....	9-1
9.1	Areas That May Warrant No Further Action by DoD .....	9-2
9.2	Potential Hazards That May Warrant FUDS Projects .....	9-2

## *List of Tables*

---

Table 1	Army Checklist for Important Ecological Places
Table 2	Munitions Information
Table 3	Groundwater Well Information



## ***List of Appendices***

---

Appendix A	Reference Sources and Records Reviewed
Appendix B	References
Appendix C	Acronyms and Abbreviations
Appendix D	Glossary (Not Used)
Appendix E	Preliminary Assessment Form
Appendix F	Ordnance Technical Data Sheets
Appendix G	Textual References of Source Documents
Appendix H	Still Photography References (Not Used)
Appendix I	Figures, Maps, and Drawings
Appendix J	Interviews
Appendix K	Accident Prevention Plan
Appendix L	Property Visit Report
Appendix M	Property Visit Photographs
Appendix N	Munitions Response Site Prioritization Protocol (Not Used)
Appendix O	Technical Advisory Group Review Sheet (Not Used)
Appendix P	Response to Comments
Appendix Q	Report Distribution
Appendix R	Report Plates

## ***Executive Summary***

---

### **Objectives and Scope**

This report presents the results of a Preliminary Assessment (PA) conducted at Locust Point Anti-Aircraft Artillery Firing Area (AAFA), Formerly Used Defense Site (FUDS) property number G05OH0996, located approximately 12 miles northwest of the city of Port Clinton, Ohio. Historical records indicate that the Locust Point AAFA was used for anti-aircraft artillery training by the 371<sup>st</sup> Anti-Aircraft Artillery Group, U.S. Army Ohio National Guard. The lease for the Locust Point AAFA expired in August 1963 and the site was transferred to private owners.

The PA was performed to: “1) eliminate from further consideration those eligible properties, or areas of an eligible property, that pose little or no threat to human health or the environment; 2) determine if there is any potential need for removal action; 3) set priorities for site inspections at eligible FUDS properties; and 4) gather data useable for any future U.S. Environmental Protection Agency Hazard Ranking System (HRS) evaluation” (U.S. Army Corps of Engineers [USACE], 2009).

This PA addresses environmental issues relative to multiple FUDS project categories including: Hazardous, Toxic, or Radiological Waste (HTRW); Military Munitions Response Program; building demolition/debris removal (BD/DR); and containerized HTRW (CON/HTRW).

### **Field Activities**

The information contained in this PA was obtained through document review, a visual site inspection, historical aerial photograph and topographic map review, and a review of environmental database reports. The document review included a record search of available information regarding environmental setting, history, and any restoration/remediation activities. Visual site inspections were conducted to look for evidence of former Department of Defense activities during property visits conducted on Monday May 5 and Tuesday May 6, 2010 at the Locust Point AAFA and on Tuesday October 26, 2010 at Camp Perry. No ground scarring or debris associated with anti-aircraft artillery activities was observed and no Material Potentially Presenting an Explosive Hazard (MPPEH) was observed at Locust Point AAFA, the surrounding area, or at Camp Perry. Media sampling was not part of the PA scope of work; therefore no media sampling was conducted as part of the PA research.

During the Camp Perry site visit performed on October 26, 2010 an interview was conducted with base personnel regarding military training activities conducted at Locust Point AAFA and/or Camp Perry during the time period 1953 to 1963. Per information gathered during this site visit, it was confirmed that Remote Controlled Aerial Targets (RCATs) were launched from Camp Perry during the time period of 1953 to 1963 in support of training activities conducted at

Locust Point AAAFA. It was also confirmed that the third point/observation tower called out on the 1952 topographic map contained within the *Findings of Eligibility* (USACE, 2009a) and identified in the Archive Search Report (USACE, 1993) as being a third AAAFA was actually a short guard tower. Originally the tower was used for small arm range activities at Camp Perry. During World War II Camp Perry was used to house German and Italian prisoners of war and the tower was used as a guard tower. After the end of the war the tower was torn down because it interfered with range activities. This information was also corroborated with interviews conducted as part of this PA.

### **Recommendations**

The Archives Search Report (USACE, 1993) describes the anti-aircraft artillery range as consisting of three firing points, with two points located at Locust Point AAAFA and one point located at Camp Perry. The review of historical records, discussions with the Ohio Army National Guard, and interviews with former employees of Camp Perry do not support a third firing point located at Camp Perry.

Based on historical evidence and the results of the PA field activities, there is no evidence of potential hazards associated with HTRW, MPPEH, BD/DR, or CON/HTRW at Locust Point AAAFA. The pathway for exposure of receptors to hazards is not considered complete. A designation of No Department of Defense Action Indicated is recommended.

## *Acknowledgements*

---

The PA has been prepared for the Department of the Army, Buffalo District, USACE.

The following Shaw project team is responsible for preparation of the PA for the FUDS Locust Point AAAFA, Ottawa County, Ohio.

- Bill Scoville, PE, PMP, Program Manager  
E-Mail: [william.scoville@shawgrp.com](mailto:william.scoville@shawgrp.com)  
Shaw Environmental & Infrastructure, Inc.  
5050 Section Avenue  
Cincinnati, OH 45212  
Phone (513) 782-4964  
Cell (513) 646-7184
- Karl Van Keuren, PG, PMP, Project Manager  
E-Mail: [karl.vankeuren@shawgrp.com](mailto:karl.vankeuren@shawgrp.com)  
Phone (513) 782-4745  
Cell (513) 349-4745
- Steven Jones, ASQ, CQA/CQE, Quality Control Manager  
E-Mail: [steve.s.jones@shawgrp.com](mailto:steve.s.jones@shawgrp.com)  
Phone (513) 782-4655  
Cell (513) 226-9515
- Paul McCarren, CPG, Project Geologist  
E-Mail: [paul.mccarren@shawgrp.com](mailto:paul.mccarren@shawgrp.com)  
Phone (513) 782-4984  
Cell (513) 300-3562
- Nicole Sojda, Environmental Scientist  
E-Mail: [nicole.sojda@shawgrp.com](mailto:nicole.sojda@shawgrp.com)  
Phone (513) 782-4533  
Cell (513) 255-6663

## **1.0 Introduction**

---

This report presents the results of a Preliminary Assessment (PA) that was conducted at the Locust Point Anti-Aircraft Artillery Firing Area (AAAFA), Ottawa County, Ohio.

This PA followed a methodical process in which available information was analyzed and conclusions were drawn about the environmental condition of the property (Appendix E). As part of the record search, previous reports, site drawings, and historical topographic maps and aerial photographs were reviewed to assist in identifying past land uses and potential environmental contamination sources. Environmental database reports were reviewed to identify areas where the presence (or absence) of contamination has been confirmed, either at the facility or on adjacent sites. Additionally, a physical inspection of the property was conducted to identify any evidence of spills, distressed vegetation, or other conditions that might indicate contamination.

A bibliography, list of references cited, and a complete acronym and abbreviations list for this document are provided in Appendices A, B, and C respectively.

### **1.1 Project Authorization**

This project was authorized “Under the authority of the Defense Environmental Restoration Program, (10 USC 2701 et seq.), and its policies and procedures relating to Formerly Used Defense Sites (DERP-FUDS), including Department of Defense (DoD) Management Guidance for the DERP dated 28 September 2001, and Engineering Regulation 200-31-1, Environmental Quality, FUDS Program Policy, Shaw Environmental & Infrastructure, Inc. (Shaw) conducted a Preliminary Assessment at the Locust Point AAAFA, Ottawa County, Ohio.” Shaw has prepared this report for the U.S. Army Corps of Engineers (USACE) in accordance with Delivery Order DN01 of Contract W912QR-08-D-0013.

### **1.2 Purpose and Objectives of the Preliminary Assessment**

The objective of this project is to conduct a PA at the former Locust Point AAAFA FUDS. The purposes of the PA are:

- 1) Eliminate from further consideration those eligible properties, or areas of an eligible property, that pose little or no threat to human health or the environment
- 2) Determine if there is any potential need for removal action
- 3) Set priorities for site inspections at eligible FUDS properties
- 4) Gather data useable for any future U.S. Environmental Protection Agency (USEPA) Hazard Ranking System (HRS) evaluation.

The objective of a PA is to determine whether releases or potential releases of contaminants related to operation occurred while the property was under DoD jurisdiction. Jurisdiction of a FUDS is defined as “real property that was under the jurisdiction of the Secretary, and owned by, leased by, or otherwise possessed by the U.S. (including governmental entities that are the legal predecessors of Department of Defense [DoD] or its Components) and those real properties where accountability rested with DoD but where the activities at the property were conducted by contractors (i.e., government-owned, contractor-operated [GOCO] properties) that were transferred from DoD control prior to 17 October 1986.” This PA addresses environmental issues relative to multiple FUDS project categories, including: Hazardous, Toxic, Radiological Waste (HTRW); Military Munitions Response Program (MMRP); building demolition/debris removal (BD/DR); and containerized HTRW (CON/HTRW).

### **1.3 Preliminary Assessment Report Content**

This document will be distributed as presented in Appendix Q and consists of the following sections:

- Section 1 – Introduction
- Section 2 – Previous Investigations
- Section 3 – Property Description, Acreage, and Land Use
- Section 4 – Historical Property Summary
- Section 5 – Evaluation of Presence of Military Munitions and Technical Data
- Section 6 – Evaluation of HTRW Presence and Areas
- Section 7 – Evaluation of CON/HTRW and BD/DR Presence
- Section 8 – Pathway and Environmental Hazard Assessment
- Section 9 – Summary and Conclusions

In addition, the findings in this document are supported by information in the following appendices:

- Appendix A – References and Records Reviewed
- Appendix B – References
- Appendix C – Acronyms and Abbreviations
- Appendix D – Glossary (not used)
- Appendix E – Preliminary Assessment Form
- Appendix F – Ordnance Technical Data Sheets

- Appendix G – Textual References of Source Documents
- Appendix H – Still Photography References (not used)
- Appendix I – Figures, Maps, and Drawings
- Appendix J – Interviews
- Appendix K – Accident Prevention Plan (APP)
- Appendix L – Property Visit Report
- Appendix M – Property Visit Photographs
- Appendix N – Munitions Response Site Prioritization Protocol (not used)
- Appendix O– Technical Advisory Group Review Fact Sheet (not used)
- Appendix P – Responses to Comments
- Appendix Q – Report Distribution
- Appendix R– Report Plates

All comments received during the PA review process and the responses to the comments are presented in Appendix P.

## **2.0 Previous Investigations**

---

A number of environmental investigations have been conducted in the area of Locust Point AAAFA; however, none have been conducted exclusively at this FUDS. The investigations primarily focused on Erie Army Depot, which includes the Locust Point AAAFA FUDS property. The following presents a summary of the investigations and the information pertaining to Locust Point AAAFA. The following documents are presented in Appendix G, Textual References of Source Documents or on the attached CD.

### **2.1 Inventory Project Report/Preliminary Assessment (USACE, 1991)**

The USACE, Huntsville District completed an Inventory Project Report/Preliminary Assessment (IPR/PA) in 1991, which stated that several hundred pieces of munitions and explosives of concern (MEC) were found on the beach area of the former Erie Army Depot (Appendix F in the Archive Search Report [ASR], USACE, 1993). The findings of determination of eligibility (FDE) contained in the 1991 IPR/PA was revised in June 2007. The revised FDE was required to correct the property acreage and to document ineligible portions of the property.

The IPR/PA did not mention any ordnance items being observed at the former Locust Point AAAFA.

### **2.2 Archives Search Report (USACE, 1993)**

The USACE, Rock Island District prepared an ASR for the Erie Army Depot in August 1993. The ASR addresses Locust Point AAAFA as a munitions response site associated with Erie Army Depot. The ASR was prepared after reviewing available records, photographs, and reports that documented the history of the site. The majority of available information about the FUDS is contained in the ASR. The ASR describes the following for Locust Point AAAFA: "The anti-aircraft artillery range consisted of three (3) firing points numbered One, Two, and Three, from west to east, along the south shore of Lake Erie. Points One and Two were located at the Locust Point AAAFA. Point Three was located on a separate property, Camp Perry, approximately 8 ½ miles east of the Locust Point AAAFA. Each firing point was equipped with a fifty-foot safety tower, which had a siren and horn. Targets consisted of radio-controlled aircraft and towed targets" (USACE, 1993).

### **2.3 Final Removal Report (Human Factors Application Inc., 1996)**

In February 1996, Human Factors Application, Inc. issued a *Final Removal Report – Unexploded Ordnance Support for the Toussaint River Dredging Project*. During dredging on the Toussaint River channel, 6 live and 31 inert ordnance items, as well as 568 pounds of scrap were located and removed. Live ordnance items included M28 3.5-inch Rockets, M49A2 60-mm Mortars;



inert ordnance items included M344 106-mm projectiles, M52 fuze, M15 Smoke Grenades, M489 105-mm projectiles, and M333 90-mm projectiles.

It was recommended that any future construction or dredging projects on Lake Erie be accompanied by unexploded ordnance (UXO) personnel. Also, the report recommended that signs be posted along the shoreline to warn boaters not to come ashore.

## **2.4 Archives Search Report Supplement (USACE, 2004b)**

The *ASR Supplement* for Erie Army Depot, which included the shoreline of Locust Point AAFA as part of the Lake Impact Area, was completed by USACE in November 2004 as an addition to the original ASR. The *ASR Supplement* includes a ranking in accordance with the Risk Assessment Code (RAC) procedure to address explosive safety hazards. Based on a rating scale of 1 through 5 (with 5 indicating a hazard occurrence as being highly unlikely and a rating of 1 indicating a hazard occurrence as being very likely), the shoreline area of Locust Point AAFA was assigned the highest RAC score of 1.

## **2.5 Final Report (Environmental Security Technology Certification Program, 2007)**

A *Final Report - Assessment of Munitions Contamination at the Former Erie Army Depot Lake Erie Impact Area and Toussaint River* was issued in August 2007 by the Environmental Security Technology Certification Program (ESTCP). The ESTCP pilot program performed an investigation on the beach of and in Lake Erie, from the mouth of the Toussaint River and the Locust Point firing area (near the Davis-Besse Nuclear Power Station) to West Sister Island. The ESTCP pilot program was intended to demonstrate the effectiveness of various technologies, either alone or in combination, as tools for wide-area assessment of areas suspected of containing unexploded munitions at DoD sites.

ESTCP located 300,000 anomalies in Lake Erie (in an 8,000-acre area) and investigated 186 of these anomalies, 141 of which were munitions or munitions debris ranging in size from 37-mm projectiles to 155-mm projectiles.

Investigation of the beach area east of the mouth of the Toussaint River and shore areas resulted in 2,000 anomalies. ESTCP investigated 18 of these anomalies and found “9 munitions items (155-mm projectiles and 2.75-inch rockets) as well as 4 non-UXO objects.”

According to ESTCP, historical MEC and munitions constituents (MC) identified for this area include:

- 20-mm, 40-mm, 75-mm, 90-mm, 105-mm, and 155-mm projectiles
- 60-mm mortar
- 3.5-inch rocket, M52 fuze
- M15 smoke grenade

## **2.6 Final Site Investigation Report Erie Army Depot (Shaw, 2008)**

The *Final Site Investigation Report Erie Army Depot*, which included the 69.32 acres of Locust Point AAAFA, was completed by Shaw in 2008. The Site Investigation (SI) included reconnaissance of Locust Point AAAFA to look for evidence of MEC. No MEC associated munitions debris was identified within the Locust Point AAAFA property. During the SI, no samples were collected because all media pathways (groundwater, terrestrial, and air) were considered to be incomplete based on no MEC or munitions debris items being identified and, therefore, no MC source being identified. A third firing point, (as identified in the ASR [USACE, 1993]), was not observed during the SI.

## **2.7 Findings and Determination of Eligibility (USACE, 2009a)**

In April 2009 the USACE issued a *Findings and Determination of Eligibility for Locust Point Anti-Aircraft Artillery Firing Area, Ottawa County, Ohio, Property Number G05OH0996*. All 69.32 acres of the site were found to be eligible under the DERP FUDS program.

## **2.8 Other Investigations**

In 1948 the Department of the Army, Headquarters Second Army, issued a letter to the Adjutant General of the State of Ohio, requesting the establishment of anti-aircraft facilities at Camp Perry (Appendix G).

Pursuant to the aforementioned letter a "Board of Officers" was convened to survey land at Camp Perry and at Locust Point to determine the suitability of those locations for establishment of anti-aircraft facilities (Appendix G). The findings of this board included the following information:

- "...the only usable part of this beach is that extending two miles to the west of the mouth of the Toussaint River. The beach in most areas very narrow but several areas, particularly near the mouth of the Toussaint River and one area about one (1) mile west of the Toussaint have sufficient depth if cleared."
- "The general area containing suitable firing points may be described as that area from a point approximately 50 yards East of the Eastern-most dwelling on the South Shore of Lake Erie East of the vicinity of Locust Point, extending Eastward along the shoreline to the mouth of the Toussaint River with an approximate depth inland from the shore of 150 yards."
- "The firing of 120mm from this vicinity (Locust Point) would be unsatisfactory because the danger would extend into Canadian waters and into the dredged ship channel to Toledo, Ohio."

This description correlates to the approximate boundary of the FUDS.

Anti-aircraft firing regulations issued for Camp Perry in 1954 by the Department of the Army, Headquarters Second Army, stated that "The antiaircraft [sic] artillery ranges consist of these firing points, numbered one, two and three, from West to East along the south shore of Lake Erie. Points one and two are located at Locust Point, approximately 8 ½ miles west of Camp Perry. Point three is located between the 1000 yard target butts of the rifle range at Camp Perry, and the Lake Shore."

In 1992, Explosive Ordnance Disposal Technology UXO technicians, along with the USACE Louisville District, identified and removed 5,438 pieces of MEC or munitions debris and 13 tons of scrap metal from the Lake Erie shoreline from the mouth of the Toussaint River east to the Ohio National Guard's Camp Perry facility (USACE, 1993).

During an emergency preparedness drill conducted October 30, 1996 at the Davis-Besse Nuclear Power Station, 11 munitions were found in a marsh area near the edge of Lake Erie by a radiation monitoring team. The site was in the general vicinity of the Locust Point firing area. An explosive ordnance team from Wright-Patterson Air Force Base responded and disposed of two 106-mm, two 155-mm, and seven rocket rounds. Based on detonations during disposal, several of the rounds were reported to have been live (Davis-Besse, 1996).

### **3.0 Property Description, Acreage, and Land Use**

---

Much of the information contained in this Section was obtained from the ASR (USACE, 1993) and the *ASR Supplement* (USACE, 2004) for the Erie Army Depot, which encompasses the Locust Point AAAFA. Additional information was obtained from Inventory Project Report/Preliminary Assessment (USACE, 1991); Final Removal Report (Human Factors Application Inc., 1996); Final Report (Environmental Security Technology Certification Program, 2007); and *Final Site Investigation Report Erie Army Depot* (Shaw, 2008), *Findings and Determination of Eligibility* (USACE, 2009a) (Appendix G).

Additional information presented in this Section was obtained during the property site visits conducted on Monday May 5 and Tuesday May 6, 2010 at the Locust Point AAAFA, and on Tuesday October 26, 2010 at Camp Perry. The purpose of the site visit conducted in October 2010 was to determine whether a third firing point had been located at Camp Perry and whether this firing point was associated with training activities conducted at Locust Point AAAFA. Notes from both site visits are presented in Appendix L, and the photographs taken during the visits are presented in Appendix M.

#### **3.1 Location**

Locust Point AAAFA, FUDS property number G05OH0996, is located in the town of Locust Point, Ottawa County, Ohio, approximately 12 miles northwest of the city of Port Clinton, Ohio (latitude 41° 35' 50" North and longitude 83° 4' 13" West) (USACE, 2009b) (Figure 1; Appendix I). The site is west of Lake Erie and is bordered on the south by the Toussaint River. The property consists of 69.32 acres in Sections 1 and 6, Township 7 North, Range 15 East. The property is located in USEPA Region 5 and in Congressional District 09.

Figure 2 (Appendix I) presents an aerial photograph dated 1951 for the general area of the FUDS. Figure 3 (Appendix I) presents a 2005 aerial photograph of the area and shows the current layout of the FUDS.

#### **3.2 FUDS Eligible Property**

Locust Point AAAFA is not listed in the MMRP Inventory in the *Defense Environmental Programs Annual Report to Congress Fiscal Year 2008* (DoD, 2008). It does, however, have a FUDS property number and one sub-range. For the purposes of this PA, the sub-range is considered an area of interest (AOI).

The FUDS covers approximately 69.32 acres (USACE, 2009b). Coordinates and range boundaries for the AOI come from Geographic Information Systems (GIS) data provided by the USACE. The approximate area of the AOI was estimated based on this data.

<b>Range Name</b>	<b>Range Identification</b>	<b>Approximate Area (acres)</b>	<b>UTM Coordinates (meters)</b>
Locust Point AAAFA	G05OH0996	69.32	N 4607140.6 E 327463.01

Coordinates for the range are in Universal Transverse Mercator (UTM), Zone 17N, NAD 83.

### **3.3 Land Use and Ownership History**

A search of available environmental records was conducted by Environmental Data Resources Inc. (EDR) (EDR, 2009). The government records search met the requirements of the Standard Practice for Environmental Site Assessments (American Society for Testing and Materials, 2005). No mapped sites were found in EDR's search of available ("reasonably ascertainable") government records either on Locust Point AAAFA or within a search radius of 2 miles around the site in known Federal, state, or local databases with the exception of the Davis-Besse Nuclear Power Station. Based on the distance between the Locust Point AAAFA and the Power Station, it is highly unlikely that any activities at the Power Station have had an environmental effect on the FUDS.

A review of the orphan sites (sites with incomplete addresses so that they could not be definitively located on a map) indicates that none of these sites are likely to have had an adverse environmental effect on the FUDS AAAFA. Additional information on the databases searched and the results for surrounding properties are included in the EDR report found in Appendix G.

#### **3.3.1 Land Use**

The primary land use within Locust Point AAAFA is open green space associated with the Davis-Besse Nuclear Power Station. The area is restricted by fencing and locked gates.

There are several well-maintained buildings and structures within the FUDS boundaries that are part of the Davis-Besse Nuclear Power Station. Immediately bordering the FUDS to the northwest is a private housing development. The remaining surrounding areas are wetlands/marshes that are maintained by the Ohio Department of Natural Resources (ODNR).

Land use within the FUDS is anticipated to remain unchanged in the future.

##### **3.3.1.1 Historical Land Use Investigations**

During the Camp Perry site visit performed on October 26, 2010, an interview was conducted with base personnel regarding military training activities conducted at Locust Point AAAFA and/or Camp Perry during the time period 1953 to 1963. The following is a summary of the information presented in Appendix J, Appendix L, and Appendix M regarding training activities at Locust Point AAAFA and whether a third firing point had been located at Camp Perry that was associated with training activities conducted at Locust Point AAAFA:

- Camp Perry personnel were not aware of anti-aircraft firing being conducted on Camp Perry property during the time period of 1953 to 1963.
- Camp Perry personnel were aware that Remote Controlled Aerial Targets (RCATs) were launched from Camp Perry during the time period of 1953 to 1963 in support of training activities conducted at Locust Point AAFA. The launch pole and weathered concrete from the RCAT launch ring were observed during the site visit (Camp Perry Photographs 006, 009, 010, 011, 013, 014, 016, 018, and 019; Appendix M).
- The third point/observation tower, identified on the 1952 topographic map contained within the *Findings of Eligibility* (USACE, 2009a) and called out in the ASR as being a third AAFA, was identified by Camp Perry personnel as being a short guard tower. Originally the tower was used for small-arms range activities at Camp Perry. During WWII, Camp Perry was used to house German and Italian prisoners of war and the tower was used as a guard tower. At the end of WWII after the prisoners of war had been removed from Camp Perry, the tower was torn down because it interfered with range activities. A replacement observation tower was erected ~200 yards east from the location of the first tower. This replacement tower was torn down in 1995, and a third observation tower, approximately 1,100 yards east of the first tower, was erected for range activities (Camp Perry Photograph 020, Appendix M and Figure 3, Appendix I).
- Camp Perry personnel stated that since the end of WWII the area where the former observation tower was has been the back-stop berm for the 1,000 yard small-arms range. To the east is an 800-yard range, a 600-yard range, and a 100-yard range (Figure L-2; Appendix L).
- During the site visit two concrete footers were observed at the location of the former observation tower (Camp Perry Photographs 021, 022, 023, and 029, Appendix M and Figure L-2, Appendix L).
- Camp Perry personnel provided photocopies of news reports from the 1953 Ottawa County News that stated "...the Army plans called for housing over 600 anti-aircraft artillery permanent soldiers at Camp Perry but that their training activities will be conducted on federal lands at Locust Point range, several miles west of the state-owned reservation" (Appendix G, Item 6).

Information corroborating that the third point/observation tower, identified on the 1952 topographic map contained within the *Findings and Determination of Eligibility* (USACE, 2009a) and identified in the ASR as being a third AAFA, was actually a short guard tower was obtained by an interview conducted with a former Contracting Officer, who was employed at Camp Perry and Erie Army Depot (Appendix J – Item 1). The following is a summary of information obtained from the interview:

- Anti-aircraft firing took place at Locust Point AAAFA during the time period of 1953 to 1963.
- The interviewee was not aware of anti-aircraft firing being conducted on Camp Perry property during the time period of 1953 to 1963 that would have been associated with training at Locust Point.
- The interviewee confirmed that RCATs were launched from Camp Perry during the time period of 1953 to 1963. As contracting officer he was responsible for payouts made for damage caused by RCATs that came down outside of the lake impact area. In particular he remembers paying for damage done to a farmer's orchard, damage to high-tension electrical wires, and money paid to a Canadian commercial fisherman whose net was damaged by a RCAT that strayed into Canadian waters.

In October 2010 a public notice was published in the *Port Clinton News-Herald* requesting information about past activities related to Locust Point AAAFA. One response was received based on the public notice. A lifelong resident of Port Clinton, Ohio responded with information regarding anti-aircraft firing taking place at Locust Point (Appendix J – Item 1). Following is a summary of information obtained from the interview:

- Per the interviewee, she remembers as a child attending a 4-H meeting held at the Sand Beach Dance Pavilion directly adjacent (west) to Locust Point. She said that her 4-H advisor was friends with a member of Military Police stationed at Camp Perry and that her 4-H club was allowed to go up to a security fence separating the private beach area near the pavilion and the area used at Locust Point for anti-aircraft artillery training.
- The interviewee's 4-H club was allowed to watch anti-aircraft artillery firing training. The training session reportedly lasted approximately 1 hour. From the 4-H club vantage point one anti-aircraft gun and its support crew were visible as well as aerial targets and projectiles hitting the aerial targets. It was explained to the 4-H club that each gun crew had a color specific projectile and that the targets could be examined as to what gun had connected with the target.

### **3.3.2 Ownership History**

Locust Point AAAFA was established in February 1953 on property leased by the United States of America from the State of Ohio and was used until August 1963. Following termination of the lease, the property was transferred back into private hands.

The 69.32-acre site is currently located within a privately owned 733-acre wildlife refuge. According to the Energy Information Administration, the wildlife refuge is part of a larger 954-acre property owned by First Energy Corporation. A detailed site ownership chronology is contained in Section 4, Historical Property Summary. Figure 4 (Appendix I) presents current land ownership in the area of the FUDS.

### **3.4 Physical Property Characteristics**

Information presented in this Section was confirmed during property site visits conducted Monday May 5 and Tuesday May 6, 2010 at the Locust Point AAAFA and on Tuesday October 26, 2010 at Camp Perry. Notes from both site visits are presented in Appendix L and photographs taken during the visits are presented in Appendix M.

PA field activities included site reconnaissance. The following conditions observed during the reconnaissance were recorded in the field logbook and site property visit reports (Appendix L) and/or by digital photographs (Appendix M):

- Presence or absence of evidence of HTRW, MPPEH, BD/DR, and CON/HTRW,
- land use,
- vegetative cover, and
- former DoD use of the property.

Representatives from USACE and First Energy Corporation accompanied the Shaw team during the May 5, 2010 reconnaissance. First Energy Corporation accompanied the Shaw team during the Monday May 6, 2010 reconnaissance. During the October 26, 2010 reconnaissance at Camp Perry, the Shaw team was accompanied by Camp Perry personnel.

#### **3.4.1 Topography and Vegetation**

Locust Point AAAFA is located in the northeastern portion of Ohio. The topography in the general area is relatively flat, varying in elevation from 570 to 580 feet (ft) above mean sea level (Figure 5; Appendix I). Vegetation is primarily open grassland or wetlands (Great Lakes Plains), which are predominantly barren or covered in low grasses (Appendix M).

#### **3.4.2 Terrain Features**

Locust Point AAAFA is bordered on the south by the Toussaint River, which flows eastward (Figure 6; Appendix I). The Toussaint River drains into Lake Erie, which borders the FUDS to the east and north. Lake Erie is the primary surface water source body in the area of Locust Point AAAFA. The terrain of the FUDS is interspersed with small surface water bodies, including ponds, canals, and wetlands (Appendix M).

#### **3.4.3 Climate**

According to the ASR (USACE, 1993):

“The climate and weather conditions are influenced by the Great Lakes. The mean January temperature for this area is 27.4 degrees Fahrenheit (°F), mean July temperature of 74.2 °F, a mean annual temperature of 51.2 °F. This area has a mean average



precipitation of 31.84 inches of rain and 31.6 inches of snow. The normal relative humidity in January is approximately 75 percent and in July approximately 72.5 percent.”

### **3.4.4 Regional Geologic and Hydrogeologic Setting**

#### **3.4.4.1 Bedrock Geology**

The geology of the area surrounding the FUDS is characterized by Wisconsinan age sediments 40 to 70 ft thick. Bedrock units underlying the area are thickest along the shore of Lake Erie. These units overlie older age Silurian and Devonian sedimentary deposits of dolomites and limestone with intervening layers of shale and sandstone.

#### **3.4.4.2 Overburden Soils**

The area surrounding the FUDS is post-glacial in origin, mostly in the lake plain of glacial Lake Maumee. The shallow surface soils consist mainly of a mixture of sand, silt, clay, and organic material.

#### **3.4.4.3 Hydrogeology**

Groundwater flow in the area is from west to east, towards Lake Erie. The depth to groundwater in the area ranges from 0 ft (wetlands) to 4 ft below ground surface (bgs) (USACE, 1993).

### **3.4.5 Sensitive Environments**

The information relative to sensitive environments associated with this site was compiled from United States Fish and Wildlife Service (USFWS) and the ODNR. The USFWS and ODNR identify two federal and state-listed endangered species within Ottawa County, the Indiana bat and the Piping plover. The Eastern prairie fringed orchid, lakeside daisy, and Lake Erie water snake, federal and state-listed threatened species, are also present in the area of Locust Point AAAFA. One federal or state candidate species, the Eastern massasauga rattlesnake, is also present in Ottawa County. The status of threatened or endangered species in the area of Locust Point AAAFA is shown in the table below:

<b>Class</b>	<b>Status</b>	<b>Common Name</b>	<b>Scientific Name</b>
Federal/State	Endangered	Indiana bat	<i>Myotis sodalist</i>
Federal/State	Endangered	Piping plover	<i>Charadrius melodum</i>
Federal/State	Threatened	Eastern prairie fringed orchid	<i>Platanthera leucophaea</i>
Federal/State	Threatened	Lakeside daisy	<i>Hymenoxys herbacea</i>
Federal/State	Threatened/Endangered	Lake Erie water snake	<i>Nerodia sipedon insularum</i>
Federal/State	Candidate/Endangered	Eastern massasauga	<i>Sistrurus catenatus</i>

The range and other areas do qualify as Important Ecological Places (IEPs), as defined by USACE (2006), or Sensitive Environments, as defined by the USEPA (1997) and are shown in Table 1 based on the presence of threatened and endangered species.

Prior to conducting site activities, the Ohio State Historic Preservation Office was contacted to evaluate the potential presence of sites on the National Register of Historic Places or any

archaeological resources within the project area. The Historic Preservation Office indicated that the project would have no effect on any cultural resources or historic properties.

Sensitive receptors located within a 4-mile radius of the FUDS are shown in Figure 7 (Appendix I).

## ***4.0 Historical Property Summary***

---

The Locust Point AAAFA is in the northern portion of the former Erie Army Depot. The following is a site chronology of Erie Army Depot, which includes the area for the Locust Point AAAFA property. Unless otherwise referenced, this information comes from the ASR (USACE, 1993).

### ***4.1 Chronological Property Summary***

In 1918 the Camp Perry Proving Ground was established. The installation provided the Army with facilities for acceptance of artillery. The name of Camp Perry Proving Ground was changed to Erie Proving Ground on August 31, 1918.

On October 23, 1918, the first proof firing program was initiated and continued until March 20, 1920, after having proof fired 7,694 units of artillery.

On July 1, 1920, the installation name was changed to Erie Ordnance Depot. It served as a receipt, storage, and issue point for specified items of anti-aircraft artillery, harbor defense artillery, fire control material, guided missiles, and related tools. By January 11, 1941, the name was changed back to Erie Proving Ground.

On February 1, 1946, Erie Army Depot reverted to its peacetime designation and was used for missions including the support of propulsion and internal guidance systems, inert ammunition, and missile components.

In 1951 Erie Ordnance Depot became the key depot for “secondary items of anti-aircraft materials and became the initial source of supply for all installations and activities east of the Mississippi River. This supply responsibility was expanded to include surface to air guided missiles and integrated fire control systems” (USACE, 1993).

“In 1953 Erie Ordnance Depot began furnishing field maintenance support for Organized Reserve Corps and Reserve Officers Training activities located in northern Ohio and Ordnance Field Maintenance for repair of wheeled vehicles, small arms ammunition, fire control equipment, and artillery. In this year, the former Erie Ordnance Depot was assigned the mission of furnishing logistical support to the national rifle and pistol matches at Camp Perry, Ohio” (USACE, 1993).

From February 1953 to August 1963 the War Department leased a portion of Erie Ordnance Depot to create Locust Point AAAFA.

“In 1954, a support detachment, (the U.S. Army Ordnance Depot Erie (4452)), was assigned to administer and provide logistical support to regular Army anti-aircraft artillery (AAA) troops and National Guard Units training at Camp Perry. The 78th Radio-Controlled Area Target (ARCAT)

was also transferred to the depot for training support. Support extended through 1960” (USACE, 1993).

A new guided missile rebuild facility was added in January 1955 for the overhaul, rebuilding, and repair of guided missiles. On August 1, 1959 “the missions for furnishing ordnance general supplies and maintenance of tools and equipment were transferred from Rossford Ordnance Depot to Erie Ordnance Depot” (USACE, 1993).

Erie Ordnance Depot was renamed Erie Army Depot on August 1, 1962, and was reassigned to the U.S. Army Supply and Maintenance Command.

“On October 1, 1962 Erie Army Depot was assigned the assembly mission for the eastern deployment of improved Nike Hercules Surface-to-Air Missile equipment.

“On February 18, 1963, Erie Army Depot was assigned the depot maintenance mission for HAWK [Service-to-Air [sic]] Missile ground equipment and associate secondary items on February 18, 1963” (USACE, 1993).

In 1967 the base closure, which began in 1955, was complete. In September 1970 First Energy Nuclear started construction on the Davis-Besse Nuclear Power Station. Operations at Davis-Besse Nuclear Power Station began in July 1978 and continue today.

## **4.2 Military Operations**

The Locust Point AAFA was used for anti-aircraft artillery training by the 371<sup>st</sup> Anti-Aircraft Artillery Group, U.S. Army Ohio National Guard. According to the ASR, “The anti-aircraft artillery range consisted of three (3) firing points numbered One, Two, and Three, from west to east, along the south shore of Lake Erie. Points One and Two were located at the Locust Point AAFA. Point Three was located on a separate property, Camp Perry, approximately 3 miles east of the Locust Point AAFA (USACE, 2009). Each firing point was equipped with a fifty foot safety tower, which had a siren and horn. Target consisted of radio-controlled aircraft and towed targets” (USACE, 1993). Review of historical records and discussions with the Ohio Army National Guard (summarized in section 3.3.2) do not support a third point being located at Camp Perry. There is an observation tower located at the beach area of Camp Perry, but given the distance (approximately 3 miles) of the tower from the Locust Point AAFA, it is unlikely that the tower was used for observation of anti-aircraft training conducted at Locust Point. In a letter from the Headquarters of the Second Army dated December 31, 1949, a recommendation was made that “...the only useable part of this beach is that extending two miles west of the mouth of the Toussaint River...The entire beach from Camp Perry to the Toussaint River is too narrow to warrant construction of firing points” (Appendix G).

The aforementioned information regarding the disposition of a third point/observation tower, identified on the 1952 topographic map contained within the *Findings of Eligibility* (USACE, 2009a) and identified in the ASR as being a third AAFA, was determined to be a short guard

tower and not associated with anti-aircraft artillery training conducted at Locust Point, base on interviews with current and former Camp Perry personnel (Section 3.3.2). Originally the tower was used for small arm range activities at Camp Perry. During WWII Camp Perry was used to house German and Italian prisoners of war, and the tower was used as a guard tower. After the end of WWII, after the prisoners of war had been removed from Camp Perry, the tower was torn down because it interfered with range activities. A replacement observation tower was erected ~200 yards from the location of the first tower. This replacement tower was torn down in 1995 and a third observation tower for range activities was erected (Camp Perry Photograph 020, Appendix M and Figure 3, Appendix I).

#### **4.2.1 Operations Involving Military Munitions**

Locust Point AAAFA was used for anti-aircraft artillery training using small arms, 37-mm, 40-mm, and 90-mm weapons systems. According to the ASR, explosively configured chemical munitions were not fired at Locust Point AAAFA (USACE, 1993). Information for munitions potentially found on site is provided in Table 2, and ordnance technical data sheets are provided in Appendix F. The boundaries of the safety fans for Locust Point AAAFA, Erie Army Depot, and Camp Perry are included on Figure 8 (Appendix I). The safety fan for anti-aircraft artillery training overlapped the Lake Impact Area range and the Artillery Firing/Aerial Gunnery Bombing and Rocket Strafing ranges for Erie Army Depot, and the Short Range Firing Fan and Automatic Weapons Firing Range for Camp Perry.

#### **4.2.2 Operations Involving HTRW**

Historical documents (Appendix G) do not indicate operations involving HTRW took place on the property. The 2010 PA property visit found no evidence to indicate the presence of HTRW.

### **4.3 Map Analysis**

Diagrams showing the range safety fan for the Locust Point AAAFA were reviewed (USACE, 1993). These drawings show the range safety fan extending into Lake Erie (Figure 8; Appendix I). The lake impact area encompassed approximately 93,585 acres, including 93,279 acres in Lake Erie. According to the ASR (USACE, 1993), the impact/safety area maintained on Lake Erie that consists of approximately 96,000 acres, and 36,033 acres of the lake impact area is still being used by Camp Perry as a target range.

Figure 11 (Appendix I) shows the 1952 topographic map contained within the *Findings and Determination of Eligibility* (USACE, 2009a) and the location, identified in the ASR as being a third observation tower and AAAFA. As discussed in Sections 3.3.2 and 4.2, the identified observation tower was originally a short (less than 50 feet) tower that was used for small arm range activities at Camp Perry. During WWII Camp Perry was used to house German and Italian prisoners of war and the tower was used as a guard tower. At the end of WWII, after the prisoners of war had been removed from Camp Perry, the tower was torn down because it

interfered with range activities. This information was verified during the during the Camp Perry site visit performed on October 26, 2010, and during interviews conducted with former and current Camp Perry and Erie Army Depot personnel (Appendices J, L, and M).

#### **4.4 Aerial Photographic Interpretation**

Aerial photographs of the FUDS from 1951 to 2005 have been reviewed and are presented in Appendix R – Report Plates. Photographs pre-dating military use have not been located. The earliest available photo, 1951, does show evidence of observation tower one and two (Historical aerial 2, Appendix R). The areas surrounding observation tower one and two have been cleared of vegetation. The roadway providing beach access to the observation towers is visible. The shoreline from Locust Point AAAFA to Camp Perry is forested. There is no visible evidence of a third observation tower on Camp Perry property (Historical aerial 4, Appendix R). This is based on the lack of any structure casting a shadow similar to those cast by the observation towers at Locust Point AAAFA. No beach disturbances are visible in the surrounding area. It was also determined that the reported location of the third observation tower on Camp Perry property is approximately 3 miles east of Locust Point, not 8 ½ miles as reported in the *Findings and Determination of Eligibility* (USACE, 2009a).

The 2005 aerial photo, shows the FUDS after the construction of the Davis-Besse Nuclear Power Station. Several buildings, a cooling tower, and a discharge drainage canal were all constructed for station operations. Observation tower one and two are no longer visible, and vegetation has returned. The shoreline from Locust Point AAAFA to Camp Perry remains forested. Shoreline regression from the 1870's to 2004 is shown in Figure 9 (Appendix I).

Historical Aerial 18 (Appendix R) shows a 2009 image of the littoral drift in Lake Erie. Figure 10 (Appendix I) shows the direction of littoral drift in the Lake Erie watershed.

Figure 11 (Appendix I) shows the 1952 topographic map contained within the *Findings and Determination of Eligibility* (USACE, 2009a) and the location identified in the ASR as being a third AAAFA, which was identified by Camp Perry personnel as being a short guard tower (Section 3.3.2). As discussed in Sections 3.3.2 and 4.2, the identified observation tower was originally a short (less than 50 feet) tower that was used for small arm range activities at Camp Perry. This is confirmed by the 1951 historical aerial photograph (Historical aerial 4, Appendix R) as discussed previously. During WWII Camp Perry was used to house German and Italian prisoners of war and the tower was used as a guard tower. At the end of WWII, after the prisoners of war had been removed from Camp Perry, the tower was torn down because it interfered with range activities. This information was verified during the during the Camp Perry site visit performed on October 26, 2010, and during the interviews conducted with former and current Camp Perry and Erie Army Depot personnel (Appendices J, L, and M).

## **5.0 Evaluation of Presence of Military Munitions and Technical Data**

---

Potential and previous military munitions found at Locust Point AAAFA are presented in this section. The APP for the field work is presented in Appendix K – Accident Prevention Plan. The presence of RCWM is also evaluated in this section.

### **5.1 General Evaluation of Conventional MEC Presence**

Munitions used at Locust Point AAAFA included 37-mm, 40-mm, and 90-mm artillery; however, munitions items and munitions debris potentially found at Locust Point AAAFA also include munitions used at Erie Army Depot and Camp Perry.

Section 2.0 of this document presents a summary of historic military documents pertaining to the establishment of anti-aircraft firing points at Locust Point. In general, the documents establish that “the general area containing suitable firing points may be described as that area from a point approximately 50 yards East of the Eastern-most dwelling on the South Shore of Lake Erie East of the vicinity of Locust Point, extending Eastward along the shoreline to the mouth of the Toussaint River with an approximate depth inland from the shore of 150 yards.” The area that is described is the approximate boundary of the FUDS. These documents also contain information stating that “The firing of 120mm from this vicinity (Locust Point) would be unsatisfactory because the danger would extend into Canadian waters and into the dredged ship channel to Toledo, Ohio.” This established that only anti-aircraft artillery training at Locust Point using only small arms and 37-mm, 40-mm, and 90-mm weapons systems.

In October 1996 during drilling at the Davis-Besse Nuclear Power Station, a total of 11 munitions were found in a marsh area near the edge of Lake Erie in the general vicinity of the Locust Point AAAFA. An explosive ordnance team from Wright-Patterson Air Force Base responded and disposed two 106-mm, two 155-mm, and seven rocket rounds (Davis-Besse, 1996). These munitions are assumed to be associated with weapons systems acceptance testing formerly conducted at Erie Army Depot. No MPPEH were observed during the 2010 PA site visits (Appendix L).

In February 1996, Human Factors Application, Inc. issued a *Final Removal Report – Unexploded Ordnance Support for the Toussaint River Dredging Project*. During dredging on the Toussaint River channel, 6 live and 31 inert ordnance items were located and removed, along with 568 pounds of scrap. The live ordnance items included M28 3.5-inch Rockets, M49A2 60-mm Mortars and the inert ordnance items included M344 106-mm projectiles, M52 fuze, M15 Smoke Grenade, M489 105-mm projectiles, M333 90-mm projectiles. These munitions are assumed to be associated with the weapons systems acceptance testing that was formerly conducted at Erie Army Depot.

*A Final Report - Assessment of Munitions Contamination at the Former Erie Army Depot Lake Erie Impact Area and Toussaint River* was issued in August 2007 by ESTCP. The ESTCP pilot program performed an investigation on the beach of and in Lake Erie from the mouth of the Toussaint River and the Locust Point firing area to West Sister Island. ESTCP located 300,000 anomalies in Lake Erie (in an 8,000-acre area) and investigated 186 of the anomalies; of which 141 were munitions or munitions debris ranging in size from 37-mm projectiles to 155-mm projectiles. The investigation of the beach and near shore areas resulted in 2,000 anomalies. ESTCP investigated 18 of these anomalies and found "9 munitions items (155-mm projectiles and 2.75-inch rockets) as well as 4 non-UXO objects."

## **5.2 General Evaluation of MC Presence**

No sampling for MC has been conducted at Locust Point AAAFA. The chemical constituents associated with the potential munitions found on site are presented in Table 2.

## **5.3 General Evaluation of RCWM Presence**

Historical documents (Appendices A and G) do not indicate that Recovered Chemical Warfare Materiel (RCWM) operations took place on the property. The chemical constituents associated with potential munitions found onsite are presented in Table 2. The 2010 PA property visit found no evidence to indicate the presence of RCWM.

## **5.4 Property Specific Locations**

The area of greatest concern for munitions debris, MPPEH, MEC, and/or MC is the Lake Erie shoreline and the mouth of the Toussaint River. Munitions were fired into Lake Erie during military activities at Locust Point AAAFA, Erie Army Depot, and Camp Perry. Range fans are discussed in Sections 4.2.1 and 4.3 of this document. Munitions debris, MEC, and/or MC have the potential to wash up on the south shore of the lake.

Subsequent to military use, a stone revetment has been installed in the area of the FUDS to prevent shoreline erosion. The revetment is 4 to 8 feet high with a limited beach area.

A review of available shoreline regression (Figure 9; Appendix I) and littoral drift (Figure 10; Appendix I) information indicates that the shoreline in the area of the FUDS had been eroding since at least the 1870's up till the stone revetment was installed. Sediment transport in the area of the FUDS is in a west-to-east direction away from the FUDS (Historical aerial 18; Appendix R). Given this information and the location of the range fans in Lake Erie to the north and east of the FUDS, it is unlikely that MEC and/or MC would be deposited in the area of the FUDS west of the mouth of the Toussaint River.



## **6.0 *Evaluation of HTRW Presence and Areas***

---

An evaluation of the HTRW presence and hazards is addressed in this section.

### **6.1 *General Evaluation of HTRW Presence***

Historical documents (Appendices A and G) do not indicate that operations involving HTRW took place on the property. During the 2010 PA property site visit no evidence of HTRW was observed at the FUDS.

### **6.2 *Property Specific Locations***

Not Applicable.

## **7.0 Evaluation of CON/HTRW and BD/DR Presence**

---

Evaluations of CON/HTRW and BD/DR presence and hazards are addressed in this section.

### **7.1 Evaluation of CON/HTRW Presence and Areas**

Historical documents (Appendices A and G) do not indicate that operations involving CON/HTRW took place on the property. During the 2010 PA property visit, no evidence of CON/HTRW was observed.

### **7.2 Evaluation of BD/DR**

During the 2010 PA property visits the BD/DR that was observed posed a minimal safety hazard. The building debris that was present included concrete and metal debris and the concrete footer, partial wooden walls and galvanized zinc trough of a former latrine (Locust Point AAAFA Photographs 022-027, 044, 049, 051, 053, 055, 056, 063-066; Appendix M). Also observed were the concrete footers from the observation towers (Locust Point AAAFA Photographs 020-021 and 070-075; Appendix M).

## **8.0 Pathway and Environmental Hazard Assessment**

---

No sampling or analysis for MC was conducted at the site. In the absence of a potential source of contamination, migration pathways and sensitive receptors are not a matter of concern with respect to MC at the FUDS.

Figure 6 (Appendix I) presents the surface water regime in the area of the FUDS. Figure 7 (Appendix I) presents sensitive receptors (natural resource areas, cultural resources) within 4 miles of the site. Figure 12 (Appendix I) shows the locations of groundwater wells (i.e., potential groundwater receptors). Figure 13 (Appendix I) presents population information for the general area of the FUDS.

### **8.1 Ground Water Pathway**

#### **8.1.1 Hydrogeologic Setting**

The geology of the area surrounding the FUDS is characterized by Wisconsin age sediments 40 to 70 ft thick. Bedrock units underlying the area are thickest along the shore of Lake Erie. These units overlie older age Silurian and Devonian sedimentary deposits of dolomites and limestone with intervening layers of shale and sandstone.

The groundwater flow in the area is from west to east, towards Lake Erie. The depth to groundwater in the area ranges from 0 ft (wetlands) to 4 ft bgs (USACE, 1993).

#### **8.1.2 Ground Water Targets**

Approximately 6,883 people use groundwater for drinking purposes in Ottawa County (EPA, 2010). There are no registered privately owned domestic water wells within the FUDS boundary (Figure 12; Appendix I). There are a total of 105 privately owned domestic water wells within 4 miles of the FUDS boundary (Table 3).

#### **8.1.3 Ground Water Conclusions**

The groundwater pathway is not considered to be a completed pathway because groundwater flows toward Lake Erie and there are no groundwater wells located between the Locust Point AAAFA and Lake Erie. No HTRW, MPPEH, BD/DR, or CON/HTRW was identified during the 2010 property visits. Because no apparent sources of groundwater contamination were identified.

### **8.2 Surface Water Pathway**

#### **8.2.1 Hydrologic Setting**

Locust Point AAAFA is bordered by the Toussaint River, which flows eastward, on the southern boundary of the FUDS (Figure 6; Appendix I). The Toussaint River drains into Lake Erie,

bordering the FUDS to the east and north. Lake Erie is the primary surface water source body in the area of Locust Point AAAFA. The terrain of the FUDS is interspersed with small surface water bodies, including ponds, canals, and wetlands.

### **8.2.2 Surface Water Targets**

Lake Erie is one of the primary sources of drinking water for the general area. Approximately 31,685 people in Ottawa County use surface water for drinking purposes (EPA, 2010). Two submerged surface water intakes, owned by the Erie Industrial Park, are located east of Locust Point AAAFA, approximately 0.5 mile and 1 mile offshore of the industrial park. The two water intakes supply water to the industrial park. The Ottawa County Regional Water System owns a submerged surface water intake located approximately 4,400 ft offshore from the town of Port Clinton within Lake Erie (USACE, 1993).

### **8.2.3 Surface Water Conclusions**

No HTRW, MPPEH, BD/DR, or CON/HTRW were identified during the 2010 property visits or during previous investigations. Given that no source has been identified the surface water pathway is considered incomplete.

## **8.3 Soil Exposure and Air Pathways**

### **8.3.1 Physical Conditions**

The present-day land surface surrounding the FUDS is post-glacial in origin and lies atop 40 to 70 ft of lake plain sediments from glacial Lake Maumee. The shallow surface soils consist mainly of a mixture of sand, silt, clay, and organic material.

### **8.3.2 Soil and Air Targets**

#### **8.3.2.1 Human Targets**

Ottawa County has a 2008 estimated population of 40,823, with a population density of 160 persons per square mile (U.S. Census, 2000) (Figure 13 Appendix I). Port Clinton is the closest major town located near Locust Point AAAFA and is located approximately 12 miles to the southeast. The 2008 U.S. Census data for the city reports a population of 6,135.

The reported population within the FUDS boundary is zero. Within 1 mile of the FUDS, the reported population is 295 with a total of 144 households. Within 4 miles of the FUDS, the reported population is 3,155 with 1,320 households (Figure 13; Appendix I) (U.S. Census, 2000).

There are no sensitive human receptors (schools, hospitals, parks, or daycares) within 200 feet of the FUDS. Due to the beach access, recreational users could potentially come into contact with ordnance items on the property or be exposed to windblown soil.

### **8.3.2.2 Environmental Targets**

Federal and state-listed threatened and endangered species and wetlands are present within 4 miles of the FUDS. There are two federally or state-listed endangered species (Indiana bat and Piping plover), three federally or state-listed threatened species (Eastern prairie fringed orchid, lakeside daisy, and Lake Erie water snake), and one federal or state-listed candidate species (Eastern massasauga rattlesnake) found in Ottawa County.

A summary of the sensitive environments is provided in Table 1 and Figure 7 (Appendix I).

### **8.3.3 Soil Exposure and Air Pathway Conclusions**

No HTRW, MPPEH, BD/DR, or CON/HTRW were identified during the 2010 property visit or during previous investigations. Given that no source has been identified the soil exposure pathway and air exposure pathways are considered incomplete.

## 9.0 Summary and Conclusions

---

The summary and conclusions of the PA are presented in this section. Locust Point AAAFA was established in February 1953 on property leased by the United States of America from the State of Ohio and was used until August 1963. Following the termination of the lease the property was transferred back into private hands.

The following agencies were contacted during the course of the PA:

- USACE District Real Estate Division
- United States Geological Survey
- USFWS
- USEPA Region 5
- Ohio EPA
- ODNR
- ODNR Office of Coastal Management
- Ottawa County Sheriff's office
- Oak Harbor Fire Department
- Oak Harbor Public Library

A summary of all interviews conducted is presented in Appendix J, Interviews.

As discussed in Sections 2.8, 3.3.2, 4.2, 4.4, 5.1, and 5.4 of this document, prior to establishment of the Locust Point AAAFA, the Department of the Army, Headquarters Second Army, required that the area from Camp Perry west to Locust Point be surveyed for the feasibility locating anti-aircraft artillery firing locations (Appendix G). The findings of the survey concluded that "The general area containing suitable firing points may be described as that area from a point approximately 50 yards East of the Eastern-most dwelling on the South Shore of Lake Erie East of the vicinity of Locust Point, extending Eastward along the shoreline to the mouth of the Toussaint River with an approximate depth inland from the shore of 150 yards." This description correlates to the approximate boundary of the FUDS.

Anti-aircraft firing regulations issued for Camp Perry in 1954 by the Department of the Army, Headquarters Second Army, stated that "The antiaircraft [sic] artillery ranges consist of these firing points, numbered one, two and three, from West to East along the south shore of Lake Erie. Points one and two are located at Locust Point, approximately 8 ½ miles west of Camp Perry. Point three is located between the 1000 yard target butts of the rifle range at Camp Perry, and the Lake Shore." This third firing point was identified on a 1952 topographic map contained

within the *Findings of Eligibility* (USACE, 2009a) as an observation tower and identified in the ASR as being a third firing point.

The disposition of a third point/observation tower was confirmed by current and former Camp Perry personnel as being a short guard tower (Section 3.3.2) not associated with anti-aircraft artillery training conducted at Locust Point. Originally the tower was used for small arm range activities at Camp Perry. During WWII, Camp Perry was used to house German and Italian prisoners of war and the tower was used as a guard tower. At the end of WWII, after the prisoners of war had been removed from Camp Perry, the tower was torn down because it interfered with range activities. A replacement observation tower was erected ~200 yards due east from the location of the first tower. This replacement tower was torn down in 1995 and a third observation tower for range activities was erected approximately 1,100 yards east of the original location (Appendix M – Photographs CampPerry\_020 and Figure 3, Appendix I).

### **9.1 Areas That May Warrant No Further Action by DoD**

Based on historical evidence and the results of PA field activities, there is no evidence of potential hazards associated with HTRW, MPPEH, BD/DR or CON/HTRW at Locust Point AAAFA. The pathway for exposure of receptors to hazards is not considered complete. No Department of Defense Action Indicated (NDAI) designation is recommended.

### **9.2 Potential Hazards That May Warrant FUDS Projects**

Based on historical evidence and the results of PA field activities, there is no evidence of potential hazards that may warrant any additional FUDS projects.