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Southern Nuclear Groundwater Protection Initiative Action Plan

Purpose:

The purpose of the Groundwater Protection Initiative (GPI) is to identify, prioritize, and schedule enhancements to site programs and procedures to prevent unauthorized migration of licensed radioactive material via water pathways offsite and to quantify impacts on decommissioning. The program should consider surface, subsurface and groundwater aquifer pathways and the appropriate response and remediation of any identified issues.

This document is designed to provide minimum requirements and guidelines to meet the intent of the NEI/Industry Groundwater Protection Initiative. It is not designed to be the total and final answer to the numerous issues which might arise as investigations proceed into groundwater monitoring for radioactivity. Each site is expected to develop a GPI program including updating/writing specific procedures.

Phase 1 (short term items) due by July 31, 2006:

1. Identify and communicate with external stakeholders (e.g. GA DNR, SCDHEC, AL RCD, etc.) about the GPI and solicit feedback – *Environmental Affairs*
 - a. GA DNR -- updated on a monthly basis about Plant Hatch status– *Environmental Affairs* (Complete and ongoing)
 - b. Inform GA DNR and SCDHEC about GPI at Vogtle – *Environmental Affairs* (Complete)
 - c. Inform GA DNR about GPI at Farley – *Environmental Affairs* (Complete)
 - d. Contacted TVA to decide on common protocol to AL RCD. We will review each other's action plans and communication protocol to see if we are similar on how we communicate with the State of Alabama – *Environmental Affairs* (Ongoing)
 - e. Inform local governmental agencies around Plant Hatch as to Hatch's groundwater issues – *External Affairs* (Completed)
2. Complete Groundwater Questionnaire for each site along with NRC cover letter – *Chemistry/HP, Environmental Affairs*
 - a. Complete. Sent to the NRC on 7-31-06 – *Environmental Affairs/Nuclear Licensing*
 - b. Review/update 10CFR50.75(g) file – *Environmental Affairs* (completed)
3. Identify and revise procedures to include communication protocol – *Chemistry/HP, Environmental Affairs* (In progress, not complete -- SNC expects to have site procedures addressing the communications protocol in place by September 30, 2006. In addition, we are in discussions with TVA to ensure similar reporting methodologies to State of Alabama.)

Phase 2 (long term items) after July 31, 2006:

1. Identify site risks for groundwater contamination based on plant design – *Corporate/Site Engineering, Maintenance, Chemistry, HP, Operations, Environmental Affairs*
 - a. Radioactive outside/underground tanks & piping
 - b. Known spill areas
 - c. Spent fuel pool leak detection systems
 - d. Airborne release plume washout
 - e. Storm water drainage systems

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2. Update/perform/evaluate groundwater hydrology and movement – *Chemistry/HP/Environmental Affairs, Consultant Hydrologist (?)*
 - a. Identify potential groundwater pathways to the environment offsite
3. Establish groundwater monitoring protocols – *Chemistry/HP/Environmental Affairs*
 - a. Evaluate sentinel indicator and groundwater monitoring wells at strategic locations where groundwater contamination might be expected to show up
 - b. Establish sampling and analysis protocols (e.g. , gamma, gross beta, distilled versus non-distilled tritium, etc.)
 - c. Determine routine groundwater tritium background levels
 - d. Determine MDCs and MDAs
4. Establish remediation thresholds – *Chemistry/HP/Environmental Affairs*
5. Revise procedures and ODCM as required – *Chemistry/HP/Environmental Affairs*
 - a. Include trigger points for various agency notifications
 - b. Groundwater monitoring locations (wells)
 - c. Sampling frequencies
 - d. Analyses required
6. Identify long term program maintenance items (e.g. preventative maintenance, inspections, self assessments, etc.) – *Corporate/Site Engineering, Maintenance ,Chemistry, HP, Operations, Environmental Affairs*