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U. S. Nuclear Regulatory Commission  
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Washington, DC 20555

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT  
DOCKET NOS. 50-445 AND 50-446  
TRANSMITTAL OF YEAR 2011 RADIOLOGICAL ENVIRONMENTAL OPERATING  
REPORT

Dear Sir or Madam:

Enclosed is the Annual Radiological Environmental Operating Report for the Comanche Peak Radiological Environmental Monitoring Program. This report is submitted pursuant to Section 5.6.2 of the Comanche Peak Units 1 and 2 Technical Specifications (Appendix A to Operating License Nos. NPF-87 and NPF-89). The report covers the period from January 1, 2011 through December 31, 2011 and summarizes the results of measurements and analysis of data obtained from samples collected during this interval.

If there are any questions regarding this report, please contact Steve Dixon at (254) 897-5482 or Scott Bradley at (254) 897-5495.

Sincerely,

Luminant Generation Company LLC

Rafael Flores

By:

  
Fred W. Madden  
Director, Oversight & Regulatory Affairs

A member of the STARS (Strategic Teaming and Resource Sharing) Alliance

Callaway · Comanche Peak · Diablo Canyon · Palo Verde · San Onofre · South Texas Project · Wolf Creek

*TEOS*  
*NRR*

Enclosure - Comanche Peak Annual Radiological Environmental Operating Report for 2011

c - E. E. Collins, Region IV  
L. K. Gibson, NRR  
Resident Inspectors, Comanche Peak

**Enclosure 1 to TXX-12063**

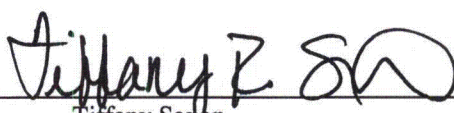
**Comanche Peak Annual Radiological Environmental Operating Report for 2011**

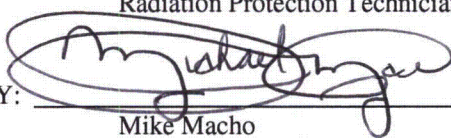
**LUMINANT**  
**COMANCHE PEAK NUCLEAR POWER PLANT**

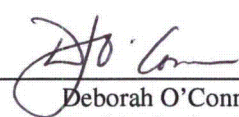
**ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING**  
**REPORT FOR 2011**

**JANUARY 1, 2011 through DECEMBER 31, 2011**

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## **I. Introduction**

Results of the Radiological Environmental Monitoring Program for the Comanche Peak Nuclear Power Plant (CPNPP) for the year 2011 are contained within this report. This report covers the period from January 1, 2011 through December 31, 2011 and summarizes the results of measurements and analysis of data obtained from environmental samples collected during this same timeframe.

### **A. Site and Station Description**

CPNPP consists of two pressurized water reactor units, each designed to operate at a power level of about 1250 megawatts (electrical). The Station is located on Squaw Creek reservoir in Somervell and Hood counties, about forty miles southwest of Fort Worth, Texas. Unit 1 received a low power operating license February 8, 1990 and achieved initial criticality on April 3, 1990. A full power license for Unit 1 was issued on April 17, 1990 and commercial operation was declared on August 13, 1990. Unit 2 achieved initial criticality on March 24, 1993 and synchronized to the electrical grid on April 9, 1993.

### **B. Objectives and Overviews of the CPNPP Radiological Environmental Monitoring Program**

The United States Nuclear Regulatory Commission (USNRC) regulations require that nuclear power plants be designed, constructed, and operated to keep levels of radioactive material in effluents to unrestricted areas as low as reasonably achievable (ALARA). To assure that these criteria are met, each license authorizing reactor operation includes technical specifications governing the release of radioactive effluents.

In-plant monitoring is used to assure that these predetermined release limits are not exceeded. However, as a precaution against unexpected and undefined processes that might allow undue accumulation of radioactivity in any sector of the environment, a program for monitoring the plant environs is also included.

Sampling locations were selected on the basis of local ecology, meteorology, physical characteristics of the region, and demographic and land use features of the site vicinity. The radiological environmental monitoring program was designed on the basis of the USNRC Branch Technical Position "An Acceptable Radiological Environmental Monitoring Program" on radiological environmental monitoring issued by the Radiological Assessment Branch, Revision 1 (November 1979), the CPNPP Technical Specification "Technical Specifications for Comanche Peak Nuclear Power Plant Units 1 and 2" and the "CPSES Offsite Dose Calculation Manual" (ODCM).

In 2011, the Radiological Environmental Monitoring Program included the following:

- The measurement of ambient gamma radiation by Optically Stimulated Luminescent dosimetry;
- The determination of airborne gross beta, gamma emitters, and Iodine-131;
- The determination of tritium and gamma emitters in surface water;
- The determination of gross beta, tritium, Iodine-131, and gamma emitters in drinking water;
- The determination of tritium and gamma emitters in ground water;
- The determination of gamma emitters in sediment and fish;
- The determination of gamma emitters in food products and;
- The determination of gamma emitters and Iodine-131 in broadleaf vegetation.

The regulations governing the quantities of radioactivity in reactor effluents allow nuclear power plants to contribute, at most, only a small percentage increase above normal background radioactivity. Background levels at any one location are not constant but vary with time as they are influenced by external events such as cosmic ray bombardment, weapons test fallout, and seasonal variations. These levels also can vary spatially within relatively short distances reflecting variations in geological composition. To differentiate between background radiation levels and increases resulting from operation of CPNPP, the radiological surveys of the plant environs were divided into pre-operational and operational phases.

The pre-operational phase of the program provided a general characterization of the radiation levels and concentrations prevalent in these areas prior to plant operation along with an indication of the degree of natural variation to be expected. The operational phase of the program obtains data which, when considered along with the data obtained in the pre-operational phase, assists in the evaluation of the radiological impact of plant operation.

Pre-operational measurements were conducted at CPNPP from 1981 to 1989. These pre-operational measurements were performed to:

- Evaluate procedures, equipment, and techniques;
- Identify potentially important pathways to be monitored after plant operation;
- Measure background levels and the variations along potentially important pathways;
- Provide baseline data for statistical comparisons with future operational analytical results.



The operational Radiological Environmental Monitoring Program is conducted to:

- Verify that measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and modeling of the environmental exposure pathways;
- Verify the effectiveness of in-plant measures used for controlling the release of radioactive materials;
- Identify changes in the areas at and beyond the site boundary that may impact the principal pathways of exposure.

This report documents the twenty-first year of operational measurements and is submitted in accordance with the requirements of the CPSES Offsite Dose Calculation Manual, Part I, Administrative Control 6.9.1.3.

## **II. Program Descriptions and Results**

### **A. Sample Locations**

Within a radius of twenty miles of the CPNPP site there are seventy-two (72) sample locations included in the monitoring program for the year 2011. The number of sample points and the specific locations for the sample points were determined by considering locations where the highest off-site environmental concentrations have been predicted from plant effluent source terms, site hydrology, and site meteorological conditions. Other factors considered were applicable regulations, population distribution, and ease of access to sampling stations, availability of samples at desired locations, security and future program integrity. Additionally an annual land use census is conducted to identify changes in the areas surrounding the plant. If changes are identified that impact the principle pathways of exposure, appropriate changes to the radiological environmental monitoring program are implemented. A copy of the report “Comanche Peak Nuclear Power Plant Land Use Census 2011” is provided in Appendix A to this report.

Table 1 – Comanche Peak Nuclear Power Plant Radiological Environmental Monitoring Program for 2011 contains a brief outline of the current program. This table specifies the sample media type, the number of locations for each media type, the sector and distance identifier for each sample location, the sample frequency, the type of analysis required and the analytical frequency required.

Table 2 – Key To Environmental Sampling Locations provides a reference that links the sampling point designations used in procedures and forms to the appropriate physical sample location (sector and distance) and to the correct sample type. This cross-reference enhances the ability to review data and tie the data to the correct sample points and to ensure all samples are collected and analyzed as specified.

Currently there are no milk sample locations within ten miles of the CPNPP site and there are no milk sample locations within twenty miles that will participate in the environmental program. CPNPP already samples extra broadleaf locations as required due to no milk locations within the ten-mile radius therefore, no changes to the program are necessary. Milk sampling will be resumed if any future annual land use census determines a dairy has been established within the specified area.

**Table 1 – Comanche Peak Nuclear Power Plant Radiological Environmental Monitoring Program for 2011**

Media	Number of Locations	Identification by Sector and Distance (miles)	Sampling Frequency (a)	Analysis	Analytical Frequency (a)
Gamma Exposure	43	N-1.45; N-4.4; N-6.5; N-9.4; NNE-1.1; NNE-5.65; NE-1.7; NE-4.8; ENE-2.5; ENE-5.0; E-0.5; E-1.9; E-3.5; E-4.2; ESE-1.4; ESE-4.7; SE-1.3; SE-3.85; SE-4.6; SSE-1.3; SSE-4.4; SSE-4.5; S-1.5; S-4.2; SSW-1.1; SSW-4.4; SW-0.9; SW-4.8; SW-12.3; WSW-1.0; WSW-5.35; WSW-7.0; W-1.0; W-2.0; W-5.5; WNW-1.0; WNW-5.0; WNW-6.7; NW-1.0; NW-5.7; NW-9.9; NNW-1.35; NNW-4.6	Q, A	Optically Stimulated Luminescent Dosimetry	Q, A
Air Particulate	8	N-9.4; E-3.5; SSE-4.5; SW-12.3; NW-1.0; N-1.45; SW/WSW-0.95; S/SSW-1.2	W	Gross Beta	W
Air Iodine				Gamma Isotopic Filter	QC
Surface Water	4	N-19.3; ESE-1.4; N-1.5; NE-7.4	M(b)	Gamma Isotopic Charcoal	W
				Gamma Isotopic Tritium	M
Surface Water/Drinking	2	NNW-0.1; N-9.9	M(c)	Gross Beta	QC
				Gamma Isotopic Iodine-131	M
				Tritium	M
Ground Water	5	SSE-4.6; W-1.2; WSW-0.1; N-9.8; N-1.45	Q	Gamma Isotopic Tritium	QC
Sediment	4	N-9.9; NNE-1.0; NE-7.4; SE-5.3	SA	Gamma Isotopic	Q
Fish	2	NNE-8.0; ENE-2.0	SA	Gamma Isotopic	SA
Food Products	1	ENE-9.0	MH	Gamma Isotopic Iodine-131	SA
Broadleaf Vegetation	3	N-1.45; SW-1.0; SW-13.5	M	Gamma Isotopic	MH

(a) Frequency codes are: W-Weekly; M-Monthly; Q-Quarterly; QC-Quarterly Composite; MH-Monthly at Harvest; SA-Semiannual; A-Annual

(b) Surface water samples from Squaw Creek are monthly composites of weekly grab samples. Surface water samples from Lake Granbury are monthly grab samples.

(c) Surface water drinking samples are a monthly composite of weekly grab samples.



**Table 2**  
**Key To Environmental Sampling Locations**

<b>SAMPLING POINT</b>	<b>LOCATION (SECTOR-MILE)</b>	<b>SAMPLE TYPE*</b>	<b>SAMPLING POINT</b>	<b>LOCATION (SECTOR-MILE)</b>	<b>SAMPLE TYPE*</b>
A1	N-1.45	A	R29	SW-12.3	R
A2	N-9.4	A	R30	WSW-1.0	R
A3	E-3.5	A	R31	WSW-5.35	R
A4	SSE-4.5	A	R32	WSW-7.0	R
A5	S/SSW-1.2	A	R33	W-1.0	R
A6	SW-12.3	A	R34	W-2.0	R
A7	SW/WSW-0.95	A	R35	W-5.5	R
A8	NW-1.0	A	R36	WNW-1.0	R
R1	N-1.45	R	R37	WNW-5.0	R
R2	N-4.4	R	R38	WNW-6.7	R
R3	N-6.5	R	R39	NW-1.0	R
R4	N-9.4	R	R40	NW-5.7	R
R5	NNE-1.1	R	R41	NW-9.9	R
R6	NNE-5.65	R	R42	NNW-1.35	R
R7	NE-1.7	R	R43	NNW-4.6	R
R8	NE-4.8	R	SW1	N-1.5	SW
R9	ENE-2.5	R	SW2	N-9.9	SW/DW
R10	ENE-5.0	R	SW3	N-19.9	SW
R11	E-0.5	R	SW4	NE-7.4	SW
R12	E-1.9	R	SW5	ESE-1.4	SW
R13	E-3.5	R	SW6	NNW-0.1	SW/DW
R14	E-4.2	R	GW1	W-1.2	GW/DW
R15	ESE-1.4	R	GW2	WSW-0.1	GW/DW
R16	ESE-4.7	R	GW3	SSE-4.6	GW/DW
R17	SE-1.3	R	GW4	N-9.8	GW/DW
R18	SE-3.85	R	GW5	N-1.45	GW/DW
R19	SE-4.6	R	SS1	NNE-1.0	SS
R20	SSE-1.3	R	SS2	N-9.9	SS
R21	SSE-4.4	R	SS3	NE-7.4	SS
R22	SSE-4.5	R	SS4	SE-5.3	SS
R23	S-1.5	R	F1	ENE-2.0	F
R24	S-4.2	R	F2	NNE-8.0	F
R25	SSW-1.1	R	FP1	ENE-9.0	FP
R26	SSW-4.4	R	BL1	N-1.45	BL
R27	SW-0.9	R	BL2	SW-1.0	BL
R28	SW-4.8	R	BL3	SW-13.5	BL

**Sample Type\***

**A – AIR SAMPLE**  
**F – FISH**  
**SS – SHORELINE SEDIMENT**  
**SW – SURFACE WATER**  
**DW – DRINKING WATER**

**GW – GROUND WATER**  
**R – DIRECT RADIATION**  
**FP – FOOD PRODUCT**  
**BL – BROADLEAF VEGETATION**

## **B. Direct Radiation**

Starting in 2009 Optically Stimulated Luminescent dosimeters (OSLs) were used to determine the direct (ambient) radiation levels at the designated monitoring locations. The monitoring locations were chosen according to the criteria given in the USNRC Branch Technical Position on Radiation Monitoring (Revision 1, November 1979). The area around the station was divided into 16 radial sectors of 22-1/2 degrees each, corresponding to the cardinal points of the compass. OSLs were placed in each of these sectors. The Optically Stimulated Luminescent dosimeters were placed in two rings around the station. An inner ring was located as close as possible to the site boundary and an outer ring was located at a distance of 4 to 6 miles from the station. Eleven additional OSLs were located at points of special interest, including two control locations. For routine direct radiation measurements, two sets of the Optically Stimulated Luminescent dosimeters (OSLs) were used at each of the 43 monitoring locations. One set of OSLs was exchanged on a quarterly basis and a second set of OSLs was exchanged on a yearly basis. Additional sets of in-transit OSLs were used as control OSLs for the quarterly and annual OSLs.

From years 2001 to 2008 thermoluminescent dosimeters TLDs were processed on-site by CPNPP National Voluntary Laboratory Accreditation Program (NVLAP) certified dosimetry personnel. Individual dosimeters were calibrated by exposure to an accurately known radiation field from a certified Cs-137 source. The year 2001 was the first year that CPNPP used the Panasonic TLD System to supply all the required direct radiation (ambient) monitoring.

In 2009 CPNPP contracted the services of Landauer Inc. to provide and process Optically Stimulated Luminescent dosimeters (OSLs.) The OSLs are used to determine the direct (ambient) radiation levels in designated monitoring locations. Landauer Inc. is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP.)

D. C. Oakley's report "National Radiation Exposure in the United States", published in 1972, calculated a background radiation dose rate equivalent of 0.22 mr/day for the area surrounding Fort Worth, Texas. This calculated value varies widely with changes in location but represents an appropriate reference value to compare with actual measured OSL doses.

Using data from the pre-operational program for the two years prior to the startup of Unit 1, the quarterly TLDs averaged a calculated dose rate of 0.14 mr/day while the yearly TLDs averaged a calculated dose rate of 0.16 mr/day. The range of measured values from this same two-year period varied from a minimum of 0.11 mr/day to a maximum of 0.22 mr/day.

Table 3 – 2011 Environmental Direct Radiation Results contains the measured dose (mr) for each quarterly OSL from each of the 43 monitoring locations. The corresponding quarterly calculated dose rate (mr/day) values are listed as well. The statistical average doses (mr) and dose rate (mr/day) values for each set of quarterly OSLs is also displayed. Additionally, the table includes the total dose (mr) of all four quarters for each specific location. The table also includes the measured dose (mr) for each annual OSL from each of the 43 monitoring locations. The corresponding annual calculated dose rate (mr/day) values are listed as well. The statistical annual average dose (mr) for the entire set of annual OSLs is reported along with the average dose rate (mr/day) for the entire set of annual OSLs.

For the year 2011, the measured dose rates of all the quarterly OSLs ranged from a minimum of **0.167 mr/day** to a maximum of **0.307 mr/day** with an average dose rate of **0.234 mr/day**. This resulted in an average quarterly dose of **21.09 mr** and a total annual dose of **84.35 mr** for all of the forty three monitoring stations.

The measured dose rates of all the annual OSL's ranged from a minimum of **0.118 mr/day** to a maximum of **0.259 mr/day** with an average dose rate of **0.175 mr/day**. This resulted in an average quarterly dose of **16.25 mr** and an average annual dose of **65 mr** for all of the forty three monitoring stations.

Comparing the pre-operational data and operational data collected through the year 2011 did not produce any anomalies. The direct radiation dose data for 2011 was consistent with previous years of data during both the pre-operational program and the previous years of the operational program. Table 14 – OSL Trend Quarterly Average contains the average quarterly OSL/TLD for the five most current years from each of the 43 monitoring locations. The implementation of the Landauer OSL system and the algorithms used to process the data from the OSL badge (implemented in 2009) accounts for the lower values as well as different type holders for the OSLs.

No abnormal quarterly results were obtained by either CPNPP or by the State of Texas, Bureau of Radiation Control.

The 2011 results for the third quarter and annual OSL, for location SSE 1.3, could not be obtained. The OSL was unable to be analyzed due to bovine damages. Condition Report 2011-10659 is associated with these damaged OSLs.

The CPNPP Annual Direct Radiation results were reported incorrectly due to personnel OSLs packaged as environmental OSL field badges. The difference between the two is the chips under copper filters. The environmental OSLs use the average of two chips and the personnel OSLs use one to calculate the direct radiation results. Condition Report CR-2012-003122 can be referenced.

**During the year 2011, CR-2011-10659 and CR-2012-003122 were the only exceptions to the Direct Radiation Program.**



**Table 3 – 2011 Environmental Direct Radiation Results**  
(Units of mr dose and mr/day dose rate)

		<b>1ST QTR</b>	<b>Average</b>	<b>2ND QTR</b>	<b>Average</b>	<b>3RD QTR</b>	<b>Average</b>	<b>4TH QTR</b>	<b>Average</b>	<b>AVG QTR</b>	<b>Annual OSL</b>	<b>Annual OSL Average</b>
<b>Location</b>		<b>Total</b>	<b>Mr/day</b>	<b>Total</b>	<b>mr/day</b>	<b>Total</b>	<b>mr/day</b>	<b>Total</b>	<b>mr/day</b>	<b>Total</b>	<b>Total</b>	<b>mr/day</b>
N-1.45	R1	23	0.247	25	0.284	23	0.253	21	0.233	23	63	0.174
N-4.4	R2	22	0.237	23	0.261	21	0.231	21	0.233	22	80	0.220
N-6.5	R3	20	0.215	19	0.216	20	0.220	22	0.244	20	57	0.157
N-9.4	R4	23	0.247	19	0.216	22	0.242	22	0.244	22	65	0.179
NNE-1.1	R5	17	0.183	16	0.182	16	0.176	18	0.200	17	45	0.124
NNE-5.65	R6	25	0.269	20	0.227	23	0.253	22	0.244	23	80	0.220
NE-1.7	R7	16	0.172	17	0.193	17	0.187	17	0.189	17	46	0.127
NE-4.8	R8	25	0.269	23	0.261	22	0.242	25	0.278	24	76	0.209
ENE-2.5	R9	22	0.237	22	0.250	27	0.297	20	0.222	23	75	0.207
ENE-5.0	R10	27	0.290	27	0.307	27	0.297	22	0.244	26	94	0.259
E-0.5	R11	18	0.194	21	0.239	22	0.242	22	0.244	21	66	0.182
E-1.9	R12	23	0.247	20	0.227	19	0.209	20	0.222	21	65	0.179
E-3.5	R13	20	0.215	22	0.250	21	0.231	19	0.211	21	66	0.182
E-4.2	R14	23	0.247	23	0.261	24	0.264	23	0.256	23	71	0.196
ESE-1.4	R15	20	0.215	22	0.250	22	0.242	21	0.233	21	59	0.163
ESE-4.7	R16	25	0.269	24	0.273	20	0.220	24	0.267	23	73	0.201
SE-1.3	R17	27	0.290	24	0.273	24	0.264	19	0.211	24	74	0.204
SE-3.85	R18	20	0.215	23	0.261	21	0.231	22	0.244	22	60	0.165
SE-4.6	R19	22	0.237	21	0.239	19	0.209	23	0.256	21	60	0.165
SSE-1.3	R20	23	0.247	21	0.239	*CR 2011-10659		19	0.211	21	*	*
SSE-4.4	R21	21	0.226	21	0.239	19	0.209	22	0.244	21	71	0.196
SSE-4.5	R22	21	0.226	22	0.250	21	0.231	19	0.211	21	65	0.179
S-1.5	R23	20	0.215	21	0.239	16	0.176	19	0.211	19	61	0.168
S-4.2	R24	19	0.204	23	0.261	19	0.209	23	0.256	21	60	0.165
SSW-1.1	R25	22	0.237	23	0.261	22	0.242	19	0.211	22	75	0.207
SSW-4.8	R26	19	0.204	24	0.273	19	0.209	24	0.267	22	62	0.171
SW-0.9	R27	22	0.237	22	0.250	21	0.231	21	0.233	22	63	0.174
SW-4.8	R28	19	0.204	18	0.205	27	0.297	20	0.222	21	72	0.198
SW-12.3 (C)	R29	22	0.237	21	0.239	22	0.242	20	0.222	21	63	0.174
WSW-1.0	R30	20	0.215	21	0.239	20	0.220	20	0.222	20	65	0.179
WSW-5.35	R31	20	0.215	21	0.239	23	0.253	24	0.267	22	65	0.179
WSW-7.0 (C)	R32	22	0.237	22	0.250	22	0.242	19	0.211	21	58	0.160
W-1.0	R33	22	0.237	18	0.205	19	0.209	18	0.200	19	62	0.171
W-2.0	R34	18	0.194	15	0.170	21	0.231	17	0.189	18	47	0.129
W-5.5	R35	17	0.183	19	0.216	20	0.220	18	0.200	19	63	0.174
WNW-1.0	R36	25	0.269	23	0.261	25	0.275	24	0.267	24	69	0.190
WNW-5.0	R37	18	0.194	24	0.273	25	0.275	25	0.278	23	68	0.187
WNW-6.7	R38	22	0.237	22	0.250	23	0.253	19	0.211	22	65	0.179
NW-1.0	R39	19	0.204	22	0.250	22	0.242	19	0.211	21	61	0.168
NW-5.7	R40	25	0.269	23	0.261	19	0.209	22	0.244	22	68	0.187
NW-9.9	R41	19	0.204	21	0.239	19	0.209	17	0.189	19	53	0.146
NNW-1.35	R42	17	0.183	17	0.193	17	0.187	15	0.167	17	43	0.118
NNW-4.6	R43	20	0.215	24	0.273	21	0.231	19	0.211	21	76	0.209
<b>AVERAGES</b>		<b>21.16</b>	<b>0.228</b>	<b>21.37</b>	<b>0.243</b>	<b>21.24</b>	<b>0.234</b>	<b>20.58</b>	<b>0.229</b>	<b>21.4</b>	<b>65.00</b>	<b>0.175</b>



**Table 14 – OSL Trend Quarterly Average (Five most current years)**

Location	2007	2008	2009	2010	2011	% Diff 2011 to 2010	2007- 2011 mR Avg	% Diff 2011 to Average
R1	15.90	19.10	20.3	21.75	23	6%	20.00	14%
R2	24.60	30.95	34.3	22.75	21.75	-4%	26.86	-21%
R3	20.60	21.15	15.3	22.25	20.25	-9%	19.90	2%
R4	19.90	22.40	24.3	21.5	21.5	0%	21.91	-2%
R5	3.30	4.15	10.3	16.75	16.75	0%	10.24	48%
R6	19.50	22.35	18.3	22.75	22.5	-1%	21.07	7%
R7	4.20	4.35	2.25	18.75	16.75	-11%	9.26	58%
R8	17.20	20.20	23.3	24.5	23.75	-3%	21.78	9%
R9	24.10	30.25	34.3	23.5	22.75	-3%	26.97	-17%
R10	35.70	36.75	44.3	24.25	25.75	6%	33.34	-26%
R11	26.90	22.30	28.3	23.25	20.75	-11%	24.29	-16%
R12	12.60	14.70	19.3	19.75	20.5	4%	17.36	17%
R13	33.40	37.60	34.3	22	20.5	-7%	29.55	-36%
R14	25.50	31.25	32.3	24.5	23.25	-5%	27.35	-16%
R15	16.80	20.95	14.3	22	21.25	-3%	19.05	11%
R16	22.20	22.20	31.3	23	23.25	1%	24.38	-5%
R17	22.10	25.50	26.3	23.25	23.5	1%	24.12	-3%
R18	17.20	19.60	23.3	20.75	21.5	4%	20.46	5%
R19	15.80	10.50	26.3	21.75	21.25	-2%	19.11	11%
R20	18.80	20.45	23.3	22.5	21	-7%	21.20	-1%
R21	22.40	12.75	28.3	23	20.75	-10%	21.43	-3%
R22	19.90	21.60	24.3	23.25	20.75	-11%	21.95	-6%
R23	15.50	16.40	23.3	21.25	19	-11%	19.08	0%
R24	16.60	21.35	21.3	20.25	21	4%	20.09	4%
R25	19.10	24.00	17.3	20.75	21.5	4%	20.52	5%
R26	18.90	17.90	27.3	22.25	21.5	-3%	21.56	0%
R27	18.20	17.00	16.3	20	21.5	7%	18.59	15%
R28	14.80	18.40	23.3	22.25	21	-6%	19.94	5%
R29	19.20	21.50	16.3	22.5	21.25	-6%	20.14	5%
R30	18.60	24.45	26.3	21.75	20.25	-7%	22.26	-9%
R31	17.70	18.05	15.3	21.75	22	1%	18.95	15%
R32	20.00	15.00	23.3	23.5	21.25	-10%	20.60	3%
R33	9.10	14.45	11.3	20	19.25	-4%	14.81	26%
R34	10.10	12.60	8.25	21.5	17.75	-19%	14.04	23%
R35	14.40	19.35	18.3	20	18.5	-8%	18.10	2%
R36	21.20	24.35	28.3	22.75	24.25	6%	24.16	0%
R37	19.70	24.20	26.3	23.5	23	-2%	23.33	-1%
R38	18.60	21.60	21.3	22.5	21.5	-5%	21.09	2%
R39	16.10	18.75	25.3	22.75	20.5	-10%	20.67	-1%
R40	19.20	25.25	30.3	23	22.25	-3%	23.99	-8%
R41	17.80	19.25	11.3	20.75	19	-9%	17.61	8%
R42	0.70	0.00	0.25	18.25	16.5	-10%	7.14	79%
R43	28.70	27.95	32.3	24.25	21	-14%	26.83	-24%
					21.09			

**Legend:**

< - 50%

> 25%

R5, R7, R42 – Readings were low during previous years. The OSL/TLD elements could have been wet since they are located on Squaw Creek Reservoir.

### C. Airborne Program

Air particulate and air iodine samples were collected each week from the eight monitoring locations described in Table 1 – Comanche Peak Nuclear Power Plant Radiological Monitoring Program for 2011. Each air particulate sample was collected by drawing air through a 47 millimeter-diameter glass-fiber filter. Air iodine was collected by drawing air through a TEDA impregnated charcoal cartridge which was connected in series behind the air particulate filter. Shipped to an independent laboratory, air particulate filters were analyzed weekly for gross beta activity and were composited quarterly for gamma spectrometry analysis. Charcoal cartridges were analyzed weekly for Iodine-131.

**For the year 2011**, a total of 416 air particulate filters were collected and analyzed for gross beta activity. The reported gross beta activity ranged from a minimum value of **1.22E-02 pCi/m<sup>3</sup>** to a maximum value of **1.36E-01 pCi/m<sup>3</sup>**. Table 4 – 2011 Environmental Airborne Particulate Gross Beta Results contains the reported values of all samples. There were no anomalies noted in the data reported for 2011 when compared to pre-operational and previous operational data. Graph 1 – 2011 Environmental Air Sample Gross Beta Results – Maximum and Minimum trends the weekly high and low gross beta values to show the seasonal variation of the results as well as providing indication of consistency between the individual monitoring locations.

A total of 424 charcoal cartridges were analyzed for airborne Iodine-131. Results from March 29, 2011 through April 5, 2011 show an increase of Iodine-131, however, the results were below the 0.9 pCi/m<sup>3</sup> ODCM reporting levels. I-131 activity was consistent with data from the control sample station and is a result of the March 11, 2011 Fukushima Daiichi nuclear disaster following the Tohoku earthquake and tsunami. South Texas Project was contacted and confirmed their eight (8) monitoring stations indicated positive results for I-131 and Cs-137 during the same two week period in March and April 2011. Table 5 – 2011 Environmental Air Sample Iodine-131 Results contains the reported values of each Iodine-131 analysis, all of which are less than the required lower limit of detection (LLD).

All air particulate filters were collected and composited quarterly and then analyzed by gamma spectrometry. The gamma isotopic data is presented in Table 6 – 2011 Environmental Air Particulate Composite Gamma Isotopic Results. Typical of pre-operational and previous operational data results, the only radioactive nuclide identified in all the samples was cosmogenic Beryllium-7, a naturally occurring isotope. Several Air Particulate Composite results were positive for Potassium-40 and Cesium-137. However, results indicate both were below the reporting levels, 0.9 pCi/m<sup>3</sup> and 20 pCi/m<sup>3</sup>, respectively.

A review of all the State of Texas air sample data indicated no anomalies.

**During the year 2011, there were no exceptions to the Airborne Program.**

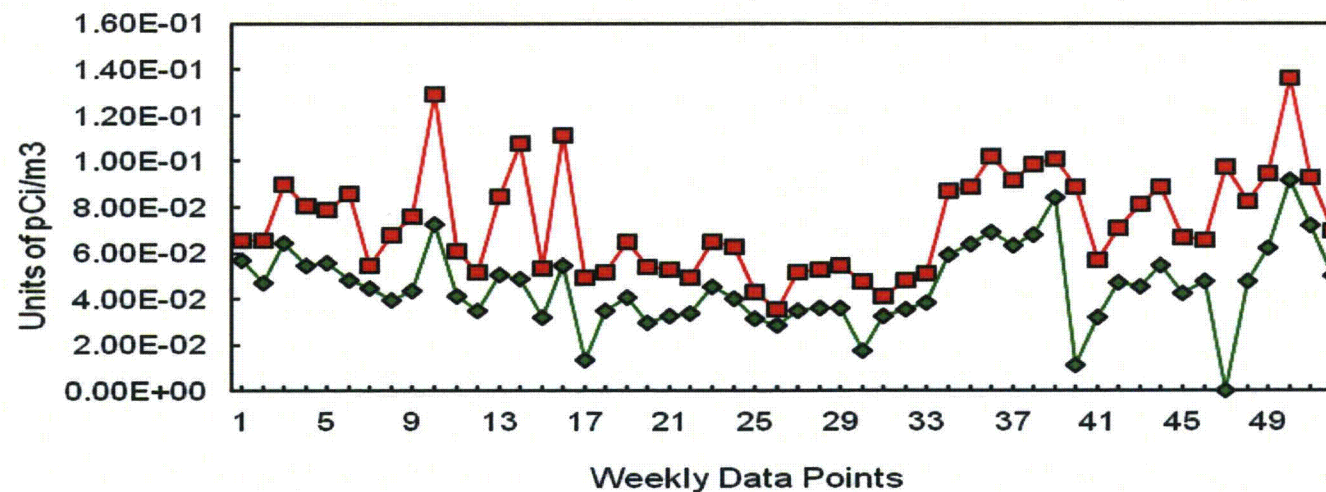


**Table 4 -- 2011 Environmental Airborne Particulate Gross Beta Results  
(Units of pCi/m3)**

	A-8	A-7	A-5	A-6	A-4	A-3	A-1	A-2
	Location							
	NW-1.0	SW/WSW-0.95	S/SSW-1.2	SW-12.3	SSE-4.5	E-3.5	N-1.45	N-9.4
Date				Control				Control
01/04/2011	6.5E-02	6.05E-02	5.69E-02	6.45E-02	6.11E-02	6.07E-02	6.55E-02	5.95E-02
01/11/2011	6.37E-02	5.53E-02	5.64E-02	5.87E-02	6.12E-02	6.24E-02	6.58E-02	4.73E-02
01/18/2011	8.98E-02	7.64E-02	6.45E-02	6.96E-02	7.95E-02	6.49E-02	7.52E-02	7.02E-02
01/25/2011	8.04E-02	6.43E-02	5.47E-02	6.93E-02	6.30E-02	6.46E-02	7.02E-02	6.14E-02
02/01/2011	7.09E-02	6.66E-02	5.57E-02	7.26E-02	6.41E-02	7.03E-02	7.87E-02	6.33E-02
02/08/2011	5.47E-02	5.45E-02	5.04E-02	8.58E-02	4.87E-02	5.13E-02	5.75E-02	4.82E-02
02/15/2011	5.41E-02	5.41E-02	4.47E-02	5.45E-02	5.17E-02	5.19E-02	5.39E-02	4.98E-02
02/22/2011	3.95E-02	4.07E-02	4.66E-02	5.29E-02	4.57E-02	6.02E-02	4.68E-02	6.77E-02
03/01/2011	4.68E-02	4.34E-02	5.58E-02	5.32E-02	5.44E-02	7.57E-02	6.04E-02	5.83E-02
03/08/2011	8.95E-02	7.26E-02	9.44E-02	1.13E-01	1.05E-01	1.29E-01	9.02E-02	1.05E-01
03/15/2011	4.32E-02	4.15E-02	5.11E-02	5.68E-02	4.11E-02	6.10E-02	4.60E-02	5.37E-02
03/22/2011	4.82E-02	3.50E-02	4.62E-02	5.17E-02	4.44E-02	4.81E-02	3.89E-02	5.09E-02
03/29/2011	7.90E-02	5.06E-02	7.19E-02	7.90E-02	6.22E-02	8.46E-02	7.18E-02	8.11E-02
04/05/2011	6.17E-02	4.89E-02	1.08E-01	6.06E-02	5.74E-02	7.26E-02	6.08E-02	7.46E-02
04/12/2011	4.74E-02	3.19E-02	3.98E-02	4.97E-02	4.52E-02	5.36E-02	4.50E-02	4.55E-02
04/19/2011	8.14E-02	5.44E-02	7.33E-02	9.72E-02	8.34E-02	1.11E-01	7.91E-02	1.04E-01
04/26/2011	3.98E-02	3.37E-02	4.33E-02	4.78E-02	3.87E-02	4.95E-02	4.86E-02	4.69E-02
05/03/2011	3.94E-02	3.61E-02	4.01E-02	4.75E-02	3.50E-02	5.14E-02	3.75E-02	5.05E-02
05/10/2011	4.59E-02	4.07E-02	5.04E-02	6.30E-02	4.91E-02	6.43E-02	6.13E-02	6.49E-02
05/17/2011	3.18E-02	2.99E-02	3.50E-02	3.28E-02	3.59E-02	3.64E-02	3.20E-02	5.39E-02
05/24/2011	4.56E-02	3.26E-02	4.17E-02	5.29E-02	4.48E-02	5.27E-02	4.41E-02	5.06E-02
05/31/2011	4.27E-02	3.38E-02	4.13E-02	4.93E-02	4.25E-02	4.94E-02	4.73E-02	4.55E-02
06/07/2011	5.10E-02	4.83E-02	4.51E-02	5.44E-02	4.75E-02	6.52E-02	5.34E-02	6.07E-02
06/14/2011	5.02E-02	4.03E-02	4.96E-02	6.25E-02	5.15E-02	5.82E-02	5.85E-02	5.66E-02
06/21/2011	3.69E-02	3.35E-02	3.76E-02	3.85E-02	3.13E-02	4.27E-02	4.02E-02	3.94E-02
06/28/2011	3.18E-02	3.13E-02	2.83E-02	2.93E-02	3.56E-02	3.43E-02	3.18E-02	3.38E-02
07/05/2011	4.20E-02	3.59E-02	3.56E-02	3.49E-02	5.17E-02	4.71E-02	5.17E-02	5.03E-02
07/12/2011	4.56E-02	5.31E-02	4.04E-02	3.61E-02	4.23E-02	4.69E-02	5.25E-02	5.13E-02
07/19/2011	3.72E-02	5.47E-02	4.59E-02	3.66E-02	3.60E-02	3.83E-02	3.91E-02	4.38E-02
07/26/2011	4.74E-02	4.67E-02	3.55E-02	3.91E-02	3.80E-02	1.78E-02	4.53E-02	3.97E-02
08/02/2011	3.24E-02	3.70E-02	3.86E-02	3.82E-02	4.02E-02	3.81E-02	4.15E-02	3.91E-02
08/09/2011	3.84E-02	4.69E-02	3.85E-02	3.94E-02	3.80E-02	3.54E-02	4.09E-02	4.80E-02
08/16/2011	4.33E-02	4.72E-02	4.29E-02	3.86E-02	5.12E-02	4.62E-02	4.34E-02	4.97E-02
08/23/2011	6.71E-02	7.04E-02	6.39E-02	6.60E-02	8.72E-02	5.95E-02	5.90E-02	6.38E-02
08/30/2011	7.62E-02	8.09E-02	6.40E-02	7.86E-02	8.88E-02	7.26E-02	6.99E-02	7.84E-02
09/06/2011	7.73E-02	9.53E-02	7.31E-02	7.39E-02	1.02E-01	6.88E-02	7.43E-02	7.98E-02
09/13/2011	6.84E-02	7.83E-02	6.30E-02	6.66E-02	9.17E-02	6.96E-02	6.65E-02	8.17E-02
09/20/2011	7.28E-02	7.68E-02	6.76E-02	7.31E-02	9.84E-02	7.35E-02	7.17E-02	7.81E-02
09/27/2011	7.44E-02	8.41E-02	5.86E-02	6.91E-02	1.01E-01	6.96E-02	5.97E-02	7.10E-02
10/04/2011	6.54E-02	7.37E-02	6.11E-02	6.37E-02	8.88E-02	1.13E-02	6.58E-02	6.83E-02
10/11/2011	4.71E-02	5.13E-02	4.16E-02	3.68E-02	5.31E-02	4.54E-02	3.18E-02	5.71E-02
10/18/2011	7.09E-02	5.22E-02	4.71E-02	5.88E-02	4.75E-02	5.82E-02	4.88E-02	6.94E-02
10/25/2011	5.95E-02	6.85E-02	4.54E-02	5.58E-02	6.24E-02	6.54E-02	5.61E-02	8.11E-02
11/01/2011	7.42E-02	7.37E-02	5.94E-02	7.88E-02	6.69E-02	7.54E-02	5.47E-02	8.88E-02
11/08/2011	5.05E-02	5.43E-02	4.26E-02	6.47E-02	4.83E-02	4.98E-02	4.98E-02	6.68E-02
11/15/2011	5.68E-02	6.50E-02	4.74E-02	5.54E-02	5.16E-02	5.07E-02	5.48E-02	6.54E-02
11/22/2011	1.22E-02	1.22E-02	7.33E-02	8.13E-02	7.71E-02	7.81E-02	6.89E-02	9.72E-02
11/29/2011	5.87E-02	6.83E-02	4.77E-02	5.54E-02	6.66E-02	5.78E-02	5.69E-02	8.23E-02
12/06/2011	8.78E-02	7.93E-02	6.20E-02	8.52E-02	6.80E-02	7.31E-02	6.34E-02	9.44E-02
12/13/2011	1.13E-01	1.17E-01	9.45E-02	1.05E-01	1.08E-01	1.11E-01	9.14E-02	1.36E-01
12/20/2011	7.62E-02	7.17E-02	7.19E-02	7.38E-02	7.38E-02	7.65E-02	8.56E-02	9.26E-02
12/27/2011	6.06E-02	6.70E-02	5.00E-02	6.06E-02	5.87E-02	6.01E-02	6.34E-02	6.96E-02
Required LLD     1.00E-02								



**Graph 1 -- 2011 Environmental Air Sample  
Gross Beta Results - Maximum and Minimum**





**Table 5 -- 2011 Environmental Air Sample Iodine-131 Results  
(Units of pCi/m3)**

	A-8	A-7	A-5	A-6	A-4	A-3	A-1	A-2
	NW-1.0	SW/WSW-0.95	S/SSW-1.2	SW-12.3	SSE-4.5	E-3.5	N-1.45	N-9.4
Date				Control				Control
01/04/2011	<3.48E-02	<2.98E-02	<3.66E-02	<3.56E-02	<3.48E-02	<3.42E-02	<3.17E-02	<2.42E-02
01/11/2011	<4.28E-02	<2.66E-02	<3.45E-02	<3.14E-02	<4.02E-02	<2.80E-02	<3.62E-02	<2.94E-02
01/18/2011	<3.58E-02	<3.86E-02	<2.77E-02	<2.70E-02	<3.71E-02	<3.89E-02	<3.15E-02	<3.16E-02
01/25/2011	<1.71E-02	<1.63E-02	<1.58E-02	<1.20E-02	<1.54E-02	<1.76E-02	<1.46E-02	<1.50E-02
02/01/2011	<1.50E-02	<2.03E-02	<2.47E-02	<2.00E-02	<2.35E-02	<1.69E-02	<2.44E-02	<2.09E-02
02/08/2011	<2.86E-02	<1.73E-02	<2.14E-02	<2.17E-02	<2.88E-02	<2.44E-02	<2.59E-02	<3.06E-02
02/15/2011	<2.30E-02	<2.25E-02	<3.93E-02	<2.32E-02	<2.58E-02	<2.98E-02	<3.09E-02	<2.49E-02
02/22/2011	<3.48E-02	<2.97E-02	<2.72E-02	<2.90E-02	<4.20E-02	<2.31E-02	<2.41E-02	<2.91E-02
03/01/2011	<4.37E-02	<1.70E-02	<2.51E-02	<2.77E-02	<3.40E-02	<2.95E-02	<3.62E-02	<2.35E-02
03/08/2011	<1.57E-02	<2.58E-02	<2.25E-02	<3.07E-02	<2.53E-02	<2.51E-02	<1.75E-02	<3.63E-02
03/15/2011	<2.03E-02	<2.03E-02	<2.25E-02	<1.83E-02	<3.33E-02	<4.84E-02	<2.03E-02	<2.84E-02
03/22/2011	<3.99E-02	<2.64E-02	<4.68E-02	<3.17E-02	<2.28E-02	<3.65E-02	<3.24E-02	<2.89E-02
03/29/2011	1.59E-01	1.44E-01	1.80E-01	1.65E-01	2.00E-01	2.49E-01	1.53E-01	2.02E-01
04/05/2011	7.70E-02	5.37E-02	1.02E-01	6.61E-02	6.04E-02	9.06E-02	5.66E-02	7.23E-02
04/12/2011	<4.06E-02	<4.00E-02	<4.57E-02	<3.89E-02	<4.76E-02	<4.12E-02	<4.28E-02	<4.17E-02
04/19/2011	<2.44E-02	<3.63E-02	<2.86E-02	<2.50E-02	<2.74E-02	<3.47E-02	<2.66E-02	<2.97E-02
04/26/2011	<4.57E-02	<3.46E-02	<3.38E-02	<4.95E-02	<4.55E-02	<4.97E-02	<3.88E-02	<4.71E-02
05/03/2011	<2.61E-02	<3.14E-02	<4.11E-02	<6.46E-02	<2.73E-02	<3.92E-02	<3.31E-02	<2.13E-02
05/10/2011	<2.08E-02	<5.23E-02	<4.89E-02	<6.24E-02	<3.56E-02	<6.66E-02	<6.39E-02	<4.45E-02
05/17/2011	<3.10E-02	<3.47E-02	<3.71E-02	<2.44E-02	<1.76E-02	<2.40E-02	<3.0E-02	<5.55E-02
05/24/2011	<2.26E-02	<3.25E-02	<4.17E-02	<2.55E-02	<3.40E-02	<2.70E-02	<3.17E-02	<5.11E-02
05/31/2011	<3.11E-02	<5.06E-02	<3.26E-02	<6.82E-02	<2.74E-02	<3.71E-02	<5.44E-02	<3.90E-02
06/07/2011	<3.42E-02	<3.24E-02	<3.35E-02	<4.24E-02	<2.40E-02	<4.65E-02	<4.53E-02	<2.67E-02
06/14/2011	<3.64E-02	<2.36E-02	<3.84E-02	<3.91E-02	<3.39E-02	<1.87E-02	<3.17E-02	<2.89E-02
06/21/2011	<3.98E-02	<4.98E-02	<4.24E-02	<4.65E-02	<3.32E-02	<2.60E-02	<2.99E-02	<4.28E-02
06/28/2011	<3.37E-02	<2.92E-02	<2.59E-02	<2.97E-02	<3.88E-02	<4.09E-02	<3.48E-02	<4.50E-02
07/05/2011	<2.95E-02	<3.72E-02	<2.90E-02	<3.82E-02	<3.90E-02	<5.35E-02	<3.87E-02	<3.14E-02
07/12/2011	<2.91E-02	<4.71E-02	<4.09E-02	<5.70E-02	<2.64E-02	<1.76E-02	<4.25E-02	<3.89E-02
07/19/2011	<3.27E-02	<3.11E-02	<4.01E-02	<2.50E-02	<3.43E-02	<3.75E-02	<3.69E-02	<2.71E-02
07/26/2011	<3.46E-02	<1.92E-02	<3.28E-02	<4.11E-02	<4.40E-02	<6.78E-02	<4.39E-02	<3.23E-02
08/02/2011	<4.10E-02	<3.04E-02	<3.02E-02	<2.70E-02	<4.31E-02	<3.80E-02	<2.76E-02	<4.22E-02
08/09/2011	<4.08E-02	<3.97E-02	<3.28E-02	<4.21E-02	<5.74E-02	<3.62E-02	<4.21E-02	<4.85E-02
08/16/2011	<2.64E-02	<6.79E-02	<4.22E-02	<5.11E-02	<3.62E-02	<3.12E-02	<3.52E-02	<4.17E-02
08/23/2011	<2.19E-02	<3.35E-02	<4.27E-02	<3.02E-02	<2.28E-02	<2.24E-02	<1.94E-02	<2.36E-02
08/30/2011	<2.59E-02	<3.24E-02	<4.09E-02	<3.33E-02	<3.15E-02	<3.75E-02	<3.18E-02	<3.69E-02
09/06/2011	<1.88E-02	<1.87E-02	<2.62E-02	<4.01E-02	<2.80E-02	<1.38E-02	<1.75E-02	<3.85E-02
09/13/2011	<1.95E-02	<3.65E-02	<3.67E-02	<1.95E-02	<2.32E-02	<2.97E-02	<4.09E-02	<3.48E-02
09/20/2011	<2.35E-02	<2.85E-02	<2.23E-02	<2.03E-02	<2.07E-02	<2.37E-02	<2.35E-02	<3.02E-02
09/27/2011	<2.22E-02	<2.28E-02	<1.69E-02	<1.94E-02	<1.55E-02	<2.12E-02	<1.99E-02	<2.57E-02
10/04/2011	<2.74E-02	<1.59E-02	<2.06E-02	<1.85E-02	<2.62E-02	<2.30E-02	<2.38E-02	<4.76E-02
10/11/2011	<2.35E-02	<3.10E-02	<2.41E-02	<1.89E-02	<1.62E-02	<3.07E-02	<1.81E-02	<2.52E-02
10/18/2011	<2.15E-02	<3.38E-02	<2.32E-02	<2.01E-02	<2.00E-02	<2.53E-02	<2.48E-02	<2.71E-02
10/25/2011	<2.51E-02	<2.01E-02	<6.09E-02	<2.56E-02	<3.43E-02	<2.15E-02	<3.39E-02	<3.09E-02
11/01/2011	<2.88E-02	<2.97E-02	<2.67E-02	<2.16E-02	<2.47E-02	<2.21E-02	<2.28E-02	<2.28E-02
11/08/2011	<2.69E-02	<1.58E-02	<2.35E-02	<2.35E-02	<3.18E-02	<4.98E-02	<2.21E-02	<2.30E-02
11/15/2011	<3.17E-02	<4.68E-02	<4.08E-02	<2.76E-02	<2.60E-02	<5.33E-02	<2.25E-02	<3.58E-02
11/22/2011	<4.76E-02	<2.61E-02	<3.05E-02	<2.81E-02	<2.20E-02	<3.05E-02	<2.93E-02	<2.21E-02
11/29/2011	<2.25E-02	<2.27E-02	<3.21E-02	<2.64E-02	<2.11E-02	<2.13E-02	<2.61E-02	<1.89E-02
12/06/2011	<5.24E-02	<1.91E-02	<3.90E-02	<5.27E-02	<2.60E-02	<5.25E-02	<3.80E-02	<6.46E-02
12/13/2011	<4.80E-02	<4.36E-02	<3.48E-02	<3.10E-02	<2.96E-02	<2.44E-02	<2.53E-02	<2.71E-02
12/20/2011	<2.64E-02	<3.36E-02	<2.94E-02	<4.48E-02	<3.58E-02	<2.89E-02	<1.79E-02	<3.47E-02
12/27/2011	<2.80E-02	<2.76E-02	<2.17E-02	<2.25E-02	<2.32E-02	<2.13E-02	<2.65E-02	<2.75E-02
Required LLD 7.00E-02								



**Table 6 -- 2011 Environmental Air Particulate Composite Gamma Isotopic Results  
(Units of pCi/m3)**

		A-8	A-7	A-5	A-6	A-4	A-3	A-1	A-2	
	Location	NW-1.0	SW/WSW-0.95	SSW-1.2	SW-12.3	SSE-4.5	E-3.5	N-1.45	N-9.4	
	Nuclides				Control				Control	
	Ba-140	<1.1E-01	<1.4E-01	<1.3E-01	<2.2E-01	<1.1E-01	<1.9E-01	<1.4E-01	<1.2E-01	
	Be-7	1.8E-01	1.3E-01	1.7E-01	2.1E-01	1.7E-01	2.1E-01	1.6E-01	1.8E-01	
	Co-57	<2.9E-04	<3.3E-04	<4.7E-04	<5.0E-04	<3.2E-04	<5.0E-04	<3.7E-04	<3.3E-04	
	Co-58	<1.1E-03	<1.2E-03	<1.8E-03	<2.6E-03	<1.5E-03	<2.4E-03	<1.4E-03	<1.2E-03	
Composite Dates	Co-60	<5.2E-04	<6.4E-04	<4.9E-04	<1.2E-03	<6.2E-04	<1.4E-03	<6.5E-04	<7.6E-04	
1ST QTR	Cs-134	<7.3E-04	<7.5E-04	<1.1E-03	<1.4E-03	<1.1E-03	<1.5E-03	<7.9E-04	<8.6E-04	Required LLD 5.0E-2
	Cs-137	6.7E-04	<7.7E-04	8.3E-04	<1.2E-04	<7.1E-04	<1.2E-03	<6.9E-04	<6.0E-04	Required LLD 6.0E-2
	Fe-59	<4.2E-03	<5.3E-03	<4.8E-03	<7.2E-03	<5.9E-03	<9.6E-03	<4.5E-03	<4.3E03	
	K-40	1.1E-02	1.6E-02	9.6E-03	<1.8E-02	<9.9E-03	<1.4E-02	2.2E-02	<6.3E-03	
	La-140	<1.1E-01	<1.4E-01	<1.2E-01	<2.2E-01	<1.1E-01	<1.9E-01	<1.4E-01	<1.2E-01	
	Mn-54	<6.3E-04	<6.8E-04	<7.2E-04	<1.4E-03	<1.0E-03	<1.3E-03	<5.5E-04	<7.5E-04	
	Nb-95	<1.5E-03	<1.3E-03	<1.6E-04	<2.5E-03	<1.4E-03	<3.1E-03	<1.4E-03	<1.3E-03	
	Zn-65	<8.8E-04	<1.7E-03	<1.5E-03	<3.1E-03	<1.8E-03	<2.6E-03	<1.5E-03	<1.4E-03	
	Zr-95	<2.3E-03	<2.2E-03	<3.1E-03	<4.5E-03	<3.1E-03	<4.8E-03	<2.5E-03	<2.7E-03	
	Ba-140	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0+00	
	Be-7	1.9E-01	1.1E-01	1.7E-01	<1.9E-01	1.7E-01	1.9E-01	1.7E-01	1.8E-01	
	Co-57	<3.8E-04	<5.9E-04	<5.5E-04	<4.4E-04	<6.1E-04	<6.3E-04	<5.1E-04	<4.4E-04	
	Co-58	<1.5E-03	<2.0E-03	<2.4E-03	<1.8E-03	<2.1E-03	<1.4E-03	<9.5E-04	<2.4E-03	
Composite Dates	Co-60	<8.2E-04	<9.8E-04	<1.1E-03	<1.0E-03	<1.0E-03	<1.0E-03	<5.9E-04	<9.6E-04	
2ND QTR	Cs-134	<1.2E-03	<1.1E-03	<1.4E-03	<1.2E-03	<1.4E-03	<1.1E-03	<1.1E-03	<1.1E-03	Required LLD 5.0E-2
	Cs-137	<5.7E-04	<8.5E-04	<7.8E-04	<9.2E-04	<9.7E-04	<1.0E-03	<6.7E-04	<9.8E-04	Required LLD 6.0E-2
	Fe-59	<4.8E-03	<8.0E-03	<6.2E-03	<7.3E-03	<7.5E-03	<6.3E-03	<5.8E-03	<7.9E-03	
	K-40	<1.5E-02	<1.8E-02	<2.1E-02	<1.8E-02	1.4E-02	<1.6E-02	<1.6E-02	<1.3E-02	
	La-140	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	
	Mn-54	<9.0E-04	<9.4E-04	<1.1E-03	<1.1E-03	<1.2E-03	<9.1E-04	<8.9E-04	<9.7E-04	
	Nb-95	<1.9E-03	<2.3E-03	<2.4E-03	<2.8E-03	<2.1E-03	<2.9E-03	<2.1E-03	<2.4E-03	
	Zn-65	<2.3E-03	<2.4E-03	<2.2E-03	<2.8E-03	<2.3E-03	<1.2E-03	<2.6E-03	<2.6E-03	
	Zr-95	<3.5E-03	<3.2E-03	<4.8E-03	<4.5E-03	<4.3E-03	<2.7E-03	<3.3E-03	<4.5E-03	



**Table 6 – 2011 Environmental Air Particulate Composite Gamma Isotopic Results (continued)**  
(Units of pCi/m3)

	Location	A-8 NW-1.0	A-7 SW/WSW-0.95	A-5 SSW-1.2	A-6 SW-12.3	A-4 SSE-4.5	A-3 E-3.5	A-1 N-1.45	A-2 N-9.4	
	Nuclides				Control				Control	
	Ba-140	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	
	Be-7	2.1E-01	2.1E-01	1.6E-01	1.8E-01	2.8E-01	1.6E-01	2.0E-01	2.5E-01	
	Co-57	<6.8E-04	<7.4E-04	<5.5E-04	<5.1E-04	<6.5E-04	<5.0E-04	<5.6E-04	<6.5E-04	
	Co-58	<3.9E-03	<4.3E-03	<2.8E-03	<2.0E-03	<3.5E-03	<1.7E-03	<2.5E-03	<2.7E-03	
Composite Dates	Co-60	<1.9E-03	<1.9E-03	<1.5E-03	<8.3E-04	<2.0E-03	<1.0E-03	<7.4E-04	<7.2E-04	
3RD QTR	Cs-134	<1.9E-03	<2.2E-03	<7.9E-04	<1.1E-03	<1.8E-03	<9.2E-04	<9.5E-04	<1.4E-03	Required LLD 5.0E-2
	Cs-137	<1.4E-03	<1.2E-03	<9.6E-04	<8.0E-04	<1.6E-03	<8.1E-04	<7.3E-04	<8.6E-04	Required LLD 6.0E-2
	Fe-59	<1.6E-02	<1.9E-02	<1.1E-02	<7.6E-03	<1.3E-02	<6.1E-03	<6.1E-03	<9.4E-03	
	K-40	<2.6E-02	<2.5E-02	1.8E-02	<1.4E-02	<2.2E-02	<1.4E-02	<9.2E-03	<1.4E-02	
	La-140	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	<0.0E+00	
	Mn-54	<2.4E-03	<1.4E-03	<1.1E-03	<1.0E-03	<1.8E-03	<9.0E-04	<1.0E-03	<8.9E-04	
	Nb-95	<4.3E-03	<3.5E-03	<2.5E-03	<1.9E-03	<4.1E-03	<2.3E-03	<2.3E-03	<2.6E-03	
	Zn-65	<2.8E-03	<3.1E-03	<2.6E-03	<2.9E-03	<4.4E-03	<2.5E-03	<2.5E-03	<2.2E-03	
	Zr-95	<8.5E-03	<6.2E-03	<4.9E-03	<4.6E-03	<7.4E-03	<4.5E-03	<3.2E-03	<2.8E-03	
	Ba-140	<8.7E-02	<1.0E-01	<1.1E-01	<1.1E-01	<1.3E-01	<9.0E-02	<1.1E-01	<8.4E-02	
	Be-7	1.6E-01	1.9E-01	1.3E-01	1.6E-01	1.6E-01	1.6E-01	1.7E-01	2.0E-01	
	Co-57	<3.4E-04	<3.3E-04	<4.1E-04	<4.0E-04	<3.7E-04	<3.1E-04	<3.8E-04	<4.4E-04	
	Co-58	<1.3E-03	<9.8E-04	<1.1E-03	<1.2E-03	<1.3E-03	<1.2E-03	<1.4E-03	<1.1E-03	
Composite Dates	Co-60	<1.2E-03	<5.7E-04	<9.1E-04	<7.5E-04	<6.7E-04	<8.1E-04	<5.6E-04	<6.9E-04	
4TH QTR	Cs-134	<6.1E-04	<6.7E-04	<7.2E-04	<7.7E-04	<8.3E-04	<7.3E-04	<6.5E-04	<8.5E-04	Required LLD 5.0E-2
	Cs-137	<5.7E-04	<4.2E-04	<5.7E-04	<6.6E-04	<6.1E-04	<5.3E-04	<5.9E-04	<6.5E-04	Required LLD 6.0E-2
	Fe-59	<4.7E-03	<3.6E-03	<4.0E-03	<5.4E-03	<3.1E-03	<4.2E-03	<5.1E-03	<5.1E-03	
	K-40	7.8E-03	1.3E-02	8.5E-03	1.3E-02	<6.7E-03	<1.2E-02	7.5E-03	<7.1E-03	
	La-140	<8.7E-02	<1.0E-01	<1.7E-01	<1.1E-01	<1.3E-01	<9.0E-02	<1.1E-01	<8.4E-02	
	Mn-54	<6.9E-04	<6.1E-04	<7.2E-04	<7.9E-04	<5.6E-04	<7.1E-04	<7.4E-04	<6.6E-04	
	Nb-95	<1.8E-03	<1.2E-03	<1.3E-03	<1.7E-03	<1.6E-03	<1.4E-03	<1.3E-03	<1.2E-03	
	Zn-65	<1.3E-03	<1.5E-03	<1.7E-03	<1.9E-03	<1.6E-03	<1.4E-03	<1.9E-03	<1.9E-03	
	Zr-95	<2.5E-03	<2.0E-03	<1.9E-03	<3.0E-03	<2.5E-03	<2.7E-03	<2.2E-03	<2.4E-03	

#### D. Surface Water Program

Surface water monitoring stations are found at four locations as detailed in Table 1 – Comanche Peak Nuclear Power Plant Radiological Environmental Monitoring Program. Location N-1.5 provides samples representative of Squaw Creek reservoir surface water at a location beyond significant influence of the plant discharge. Location ESE-1.4 provides samples representative of discharges from Squaw Creek reservoir downstream to Squaw Creek and to Lake Granbury via an installed return line. [NOTE: *The installed return line to Lake Granbury has never been used to send water back to Lake Granbury.*] Location NE-7.4 provides samples of Lake Granbury surface water downstream of the discharge from the return line from Squaw Creek reservoir. A control sample is obtained from the Brazos River, upstream of Lake Granbury at location N-19.3. Surface water samples from Squaw Creek reservoir locations were collected weekly and composited for monthly gamma isotopic analysis. Samples from Lake Granbury locations were collected monthly and analyzed by gamma spectrometry. All surface water samples were also composited quarterly by location for tritium analysis.

**For the year 2011** all surface water samples were collected as required. Table 7 -- 2011 Environmental Surface Water Tritium and Gamma Isotopic Results contains the reported values. Forty-eight samples were analyzed by gamma spectrometry. All results for the required radionuclides were reported as less than the required LLDs. Sixteen quarterly composited samples were analyzed for tritium. The results of the reported tritium values for Squaw Creek reservoir were in line with expected concentrations. The tritium values ranged from a high of **1.70E+04 pCi/l** to a low of **1.27E+04 pCi/l**. The results from Lake Granbury were all less than the required LLDs as expected. The tritium concentration reported in Squaw Creek is well below the action level of **3.0E+4 pCi/l** and is following the expected concentration variations based on fuel cycles, power histories and reservoir makeup due to rain and pump transfers from Lake Granbury. Graph 2 – 2011 Environmental Surface Water Tritium Results indicates the current results and the short-term trend of the tritium concentration in Squaw Creek reservoir. Graph 3 – Squaw Creek Maximum Tritium Values trends the reservoir tritium concentration since it was first detected in 1990 after Unit 1 startup and is located on page 27. This long-term graph also indicates that equilibrium concentrations may have been obtained. **Squaw Creek reservoir tritium is a direct product of the operation of CPNPP and is the only consistent indicator detectable in the environment surrounding Comanche Peak.**

There should not be any significant changes in the tritium concentrations in the near future and no action levels are anticipated. A review of pre-operational and operational data indicated the 2011 results were both expected and consistent with previous data and that no anomalies had occurred.

**During the year 2011, there were no exceptions to the Surface Water Program.**

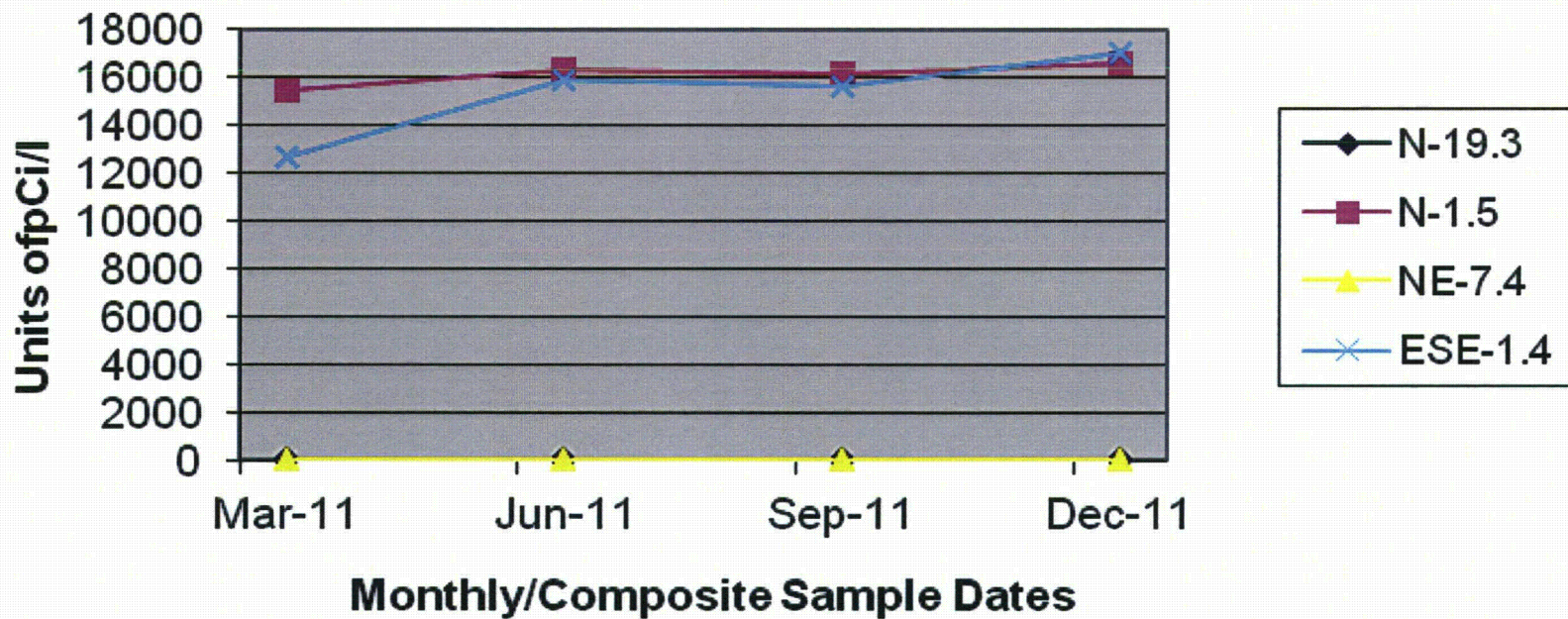


**Table 7 -- 2011 Environmental Surface Water Tritium and Gamma Isotopic Results**  
(Units of pCi/l)

Date	SW-5 Location	H-3	Nuclides Ba-140	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	I-131	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
1/25/11	ESE-1.4		<2.9E+00	<1.5E+01	<1.8E+00	<1.8E+00	<2.2E+00	<1.8E+00	<3.3E+00	<3.2E+00	<2.1E+01	<2.9E+00	<1.7E+00	<1.9E+00	<3.6E+00	<3.1E+00
2/22/11	ESE-1.4		<1.6E+02	<3.7E+01	<3.2E+00	<1.9E+00	<2.2E+00	<1.8E+00	<9.4E+00	0.00E+00	<1.7E+01	<1.6E+02	<2.0E+00	<4.2E+00	<4.0E+00	<6.4E+00
3/29/11	ESE-1.4	1.27E+04	<3.2E+00	<1.8E+01	<2.3E+00	<2.3E+00	<2.7E+00	<2.1E+00	<4.3E+00	<3.7E+00	3.3E+01	<3.2E+00	<2.2E+00	<2.5E+00	<5.2E+00	<3.6E+00
4/26/11	ESE-1.4		<1.4E+01	<2.9E+01	<3.8E+00	<3.1E+00	<3.5E+00	<3.2E+00	<8.4E+00	<2.2E+01	4.7E+01	<1.4E+01	<3.4E+00	<3.5E+00	<6.7E+00	<5.6E+00
5/31/11	ESE-1.4		<4.7E+00	<1.4E+01	<1.5E+00	<1.5E+00	<1.6E+00	<1.4E+00	<3.4E+00	<6.4E+00	<1.5E+01	<4.7E+00	<1.3E+00	<1.7E+00	<2.8E+00	<2.4E+00
6/28/11	ESE-1.4	1.59E+04	<7.8E+00	<2.2E+01	<2.5E+00	3.3E+00	<2.9E+00	<2.7E+00	<5.8E+00	<1.0E+01	<2.1E+01	<7.8E+00	<2.2E+00	<2.9E+00	<5.2E+00	<4.6E+00
7/26/11	ESE-1.4		<1.1E+01	<2.6E+01	<2.5E+00	<2.5E+00	<2.6E+00	<2.3E+00	<6.7E+00	<3.0E+01	2.5E+01	<1.1E+01	<2.2E+00	<2.7E+00	<4.8E+00	<4.6E+00
8/30/11	ESE-1.4		<6.0E+00	<1.8E+01	<1.9E+00	<2.1E+00	<1.9E+00	<2.0E+00	<4.2E+00	<9.0E+00	<1.8E+01	<6.0E+00	<1.8E+00	<2.1E+00	<3.6E+00	<3.5E+00
9/27/11	ESE-1.4	1.56E+04	<1.0E+01	<2.6E+01	<2.8E+00	<2.6E+00	<3.2E+00	<2.6E+00	<6.3E+00	<1.3E+01	<2.9E+01	<1.0E+01	<2.3E+00	<2.9E+00	<5.7E+00	<5.3E+00
10/25/11	ESE-1.4		<4.8E+00	<1.5E+01	<1.6E+00	<1.6E+00	<1.9E+00	<1.7E+00	<3.8E+00	<7.7E+00	<1.7E+01	<4.8E+00	<1.4E+00	<1.8E+00	<3.0E+00	<3.4E+00
11/29/11	ESE-1.4		<4.5E+00	<1.6E+01	<1.8E+00	<1.8E+00	<1.9E+00	<1.6E+00	<3.6E+00	<7.5E+00	1.9E+01	<4.5E+00	<1.6E+00	<1.8E+00	<3.3E+00	<3.2E+00
12/27/11	ESE-1.4	1.70E+04	<5.7E+00	<1.9E+01	<2.0E+00	<2.2E+00	<1.9E+00	<1.9E+00	<4.7E+00	<9.2E+00	<1.9E+01	<5.7E+00	<1.7E+00	<2.2E+00	<3.8E+00	<3.6E+00
1/25/11	SW-1		Ba-140	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	I-131	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
1/25/11	N-1.5		<4.4E+00	<1.8E+01	<2.2E+00	<1.9E+00	<2.7E+00	<3.8E+00	<4.9E+00	<3.5E+00	<3.5E+01	<4.4E+00	<2.1E+00	<2.0E+00	<4.7E+00	<3.6E+00
2/22/11	N-1.5		<1.9E+02	<4.2E+01	<4.1E+00	<2.3E+00	<2.7E+00	<3.4E+00	<1.3E+01	0.00E+00	6.5E+01	<1.9E+02	<2.4E+00	<4.7E+00	<5.1E+00	<8.4E+00
3/29/11	N-1.5	1.55E+04	<3.7E+00	<1.8E+01	<2.2E+00	<2.3E+00	<2.8E+00	<2.4E+00	<4.7E+00	<3.8E+00	2.9E+01	<3.7E+00	<2.2E+00	<2.5E+00	<4.9E+00	<4.5E+00
4/26/11	N-1.5		<1.1E+01	<2.7E+01	<2.6E+00	<2.9E+00	<2.8E+00	<2.8E+00	<7.2E+00	<2.2E+01	3.1E+01	<1.1E+01	<2.6E+00	<3.5E+00	<5.9E+00	<4.8E+00
5/31/11	N-1.5		<5.2E+00	<1.5E+01	<1.7E+00	<1.6E+00	<1.8E+00	<1.7E+00	<3.5E+00	<7.8E+00	1.9E+01	<5.2E+00	<1.4E+00	<1.8E+00	<3.1E+00	<2.9E+00
6/28/11	N-1.5	1.63E+04	<6.4E+00	<2.1E+01	<2.4E+00	<2.6E+00	<2.6E+00	<3.0E+00	<4.6E+00	<1.1E+01	4.6E+01	<6.4E+00	<2.0E+00	<2.5E+00	<5.1E+00	<4.6E+00
7/26/11	N-1.5		<1.2E+01	<2.0E+01	<2.3E+00	<1.9E+00	<2.2E+00	<1.9E+00	<5.1E+00	<2.6E+01	3.5E+01	<1.2E+01	<1.9E+00	<2.5E+00	<4.1E+00	<4.3E+00
8/30/11	N-1.5		<7.3E+00	<2.3E+01	<2.2E+00	<2.6E+00	<2.8E+00	<3.6E+00	<6.1E+00	<1.0E+01	<2.1E+01	<7.3E+00	<2.1E+00	<2.5E+00	<4.4E+00	<4.3E+00
9/27/11	N-1.5	1.62E+04	<2.6E+00	<2.6E+01	<2.6E+00	<3.0E+00	<2.9E+00	<4.5E+00	<9.5E+00	<1.3E+01	<3.9E+01	<9.5E+00	<2.6E+00	<3.4E+00	<6.1E+00	<5.6E+00
10/25/11	N-1.5		<8.7E+00	<2.5E+01	<2.8E+00	<2.9E+00	<3.2E+00	<2.4E+00	<6.3E+00	<1.2E+01	2.9E+01	<8.7E+00	<2.7E+00	<2.8E+00	<5.5E+00	<5.3E+00
11/29/11	N-1.5		<5.2E+00	<1.8E+01	<1.9E+00	<1.8E+00	<2.1E+00	<1.9E+00	<4.4E+00	<7.8E+00	<1.8E+01	<5.2E+00	<1.7E+00	<2.2E+00	<3.8E+00	<3.7E+00
12/27/11	N-1.5	1.66E+04	<6.1E+00	<2.4E+01	<2.6E+00	<2.4E+00	<2.7E+00	<3.7E+00	<3.0E+01	<1.0E+01	<3.4E+01	<6.1E+00	<2.0E+00	<2.6E+00	<4.8E+00	<4.6E+00
1/25/11	SW-4		Ba-140	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	I-131	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
1/25/11	NE-7.4		<2.9E+00	<1.4E+01	<1.7E+00	<1.7E+00	<2.0E+00	<1.7E+00	<3.6E+00	<3.0E+00	<1.5E+01	<2.9E+00	<1.7E+00	<1.7E+00	<3.3E+00	<2.8E+00
2/22/11	NE-7.4		<1.5E+02	<3.9E+01	<2.4E+00	<1.6E+00	<2.4E+00	<1.8E+00	<1.0E+01	6.7E+02	<2.7E+01	<1.5E+02	<1.9E+00	<4.3E+00	<4.7E+00	<6.1E+00
3/29/11	NE-7.4	<1.20E+03	<4.0E+00	<1.9E+01	<2.5E+00	<2.8E+00	<3.1E+00	<2.7E+00	<6.1E+00	<3.9E+00	<3.1E+01	<4.0E+00	<2.7E+00	<2.7E+00	<5.2E+00	<4.9E+00
4/26/11	NE-7.4		<9.8E+00	<2.3E+01	<2.4E+00	<2.2E+00	<2.8E+00	<2.4E+00	<6.4E+00	<1.8E+01	<2.2E+01	<9.8E+00	<2.4E+00	3.4E+00	<5.1E+00	<4.1E+00
5/31/11	NE-7.4		<2.2E+00	<1.3E+01	<1.6E+00	<1.9E+00	<1.8E+00	<1.8E+00	<3.2E+00	<2.5E+00	<2.3E+01	<2.2E+00	<1.5E+00	<1.5E+00	<3.2E+00	<2.8E+00
6/28/11	NE-7.4	<3.98E+02	<3.5E+00	<2.0E+01	<2.3E+00	<2.6E+00	<2.8E+00	<2.3E+00	<4.6E+00	<4.3E+00	<3.2E+01	<3.5E+00	<2.2E+00	<2.2E+00	<4.6E+00	<4.2E+00
7/26/11	NE-7.4		<3.7E+00	<2.1E+01	<2.6E+00	<2.9E+00	<3.1E+00	<2.8E+00	<5.2E+00	<4.1E+00	<2.6E+01	<3.7E+00	<2.4E+00	<2.8E+00	<5.2E+00	<4.9E+00
8/30/11	NE-7.4		<3.1E+00	<1.7E+01	<1.8E+00	<1.9E+00	<2.2E+00	<1.9E+00	<3.7E+00	<3.1E+00	<2.3E+01	<3.1E+00	<1.8E+00	<1.9E+00	<3.2E+00	<3.1E+00
9/27/11	NE-7.4	<4.86E+02	<3.7E+00	<1.9E+01	<2.3E+00	<2.5E+00	<2.6E+00	<2.4E+00	<4.3E+00	<4.6E+00	<3.6E+01	<3.7E+00	<2.1E+00	<2.3E+00	<4.8E+00	<4.5E+00
10/25/11	NE-7.4		<3.3E+00	<1.7E+01	<1.8E+00	<1.9E+00	<2.2E+00	<2.3E+00	<3.6E+00	<4.1E+00	<2.9E+01	<3.3E+00	<1.8E+00	<1.9E+00	<3.7E+00	<3.2E+00
11/29/11	NE-7.4		<2.5E+00	<1.5E+01	<1.5E+00	<1.8E+00	<2.1E+00	<1.8E+00	<3.3E+00	<2.4E+00	<2.5E+01	<2.5E+00	<1.6E+00	<1.8E+00	<3.7E+00	<3.1E+00
12/27/11	NE-7.4	<4.09E+02	<3.7E+00	<1.7E+01	<1.7E+00	<1.9E+00	<2.3E+00	<1.9E+00	<4.1E+00	<3.9E+00	<1.9E+01	<3.7E+00	<1.9E+00	<2.1E+00	<4.3E+00	<3.6E+00
1/25/11	SW-3		Ba-140	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	I-131	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
1/25/11	N-19.3		<3.5E+00	<1.8E+01	<1.9E+00	<1.9E+00	<2.2E+00	<2.0E+00	<3.7E+00	<3.9E+00	<1.8E+01	<3.5E+00	<1.8E+00	<2.1E+00	<3.8E+00	<3.2E+00
2/22/11	N-19.3		<1.3E+02	<3.4E+01	<3.2E+00	<1.9E+00	<2.2E+00	<1.8E+00	<8.5E+00	2.6E+02	<1.3E+02	<1.3E+02	<1.8E+00	<3.8E+00	<3.9E+00	<6.1E+00
3/29/11	N-19.3	<1.30E+03	<3.1E+00	<1.5E+01	<1.6E+00	<1.7E+00	<2.2E+00	<1.7E+00	<3.8E+00	<3.2E+00	<1.9E+01	<3.1E+00	<1.7E+00	<1.8E+00	<3.7E+00	<2.9E+00
4/26/11	N-19.3		<1.3E+01	<2.8E+01	<2.7E+00	<3.2E+00	<3.0E+00	<2.9E+00	<5.9E+00	<1.9E+01	<2.7E+01	<1.3E+01	<2.8E+00	<3.3E+00	<5.4E+00	<5.7E+00
5/31/11	N-19.3		<2.1E+00	<1.2E+01	<1.4E+00	<1.5E+00	<1.7E+00	<1.4E+00	<2.7E+00	<1.9E+00	<1.9E+01	<2.1E+00	<1.4E+00	<1.4E+00	<2.9E+00	<2.3E+00
6/28/11	N-19.3	<3.95E+02	<2.9E+00	<1.5E+01	<1.7E+00	<2.4E+00	<2.4E+00	<1.8E+00	<3.6E+00	<3.3E+00	<1.8E+01	<2.9E+00	<1.7E+00	<1.9E+00	<3.6E+00	<3.4E+00
7/26/11	N-19.3		<5.4E+00	<2.2E+01	<3.2E+00	<3.2E+00	<3.1E+00	<2.6E+00	<5.2E+00	<4.1E+00	<4.0E+01	<5.4E+00	<2.3E+00	<2.6E+00	<5.7E+00	<4.2E+00
8/30/11	N-19.3		<2.9E+00	<1.8E+01	<2.1E+00	<1.9E+00	<2.6E+00	<2.2E+00	<3.6E+00	<3.5E+00	<2.5E+01	<2.9E+00	<1.9E+00	<1.9E+00	<3.8E+00	<3.5E+00
9/27/11	N-19.3	<4.84E+02	<5.9E+00	<2.4E+01	<2.6E+00	<2.9E+00	<3.3E+00	<2.9E+00	<5.9E+00	<5.5E+00	<3.8E+01	<5.9E+00	<2.4E+00	<2.7E+00	<4.9E+00	<4.9E+00
10/25/11	N-19.3		<2.7E+00	<1.4E+01	<1.6E+00	<1.5E+00	<1.9E+00	<1.7E+00	<2.9E+00	<3.3E+00	<2.5E+01	<2.7E+00	<1.6E+00	<1.7E+00	<3.4E+00	<2.6E+00
11/29/11	N-19.3		<1.9E+00	<1.2E+01	<1.3E+00	<1.7E+00	<1.6E+00	<1.6E+00	<2.6E+00	<1.9E+00	<2.0E+01	<1.9E+00	<1.4E+00	<1.5E+00	<2.8E+00	<2.4E+00
12/27/11	N-19.3	<4.07E+02	<3.9E+00	<1.9E+01	<1.9E+00	<2.3E+00	<2.4E+00	<2.3E+00	<4.1E+00	<3.9E+00	<2.3E+01	<3.9E+00	<1.9E+00	<2.0E+00	<3.9E+00	<4.0E+00
Required LLD's		3.00E+03	1.50E+01	1.50E+01	1.50E+01	1.50E+01	1.50E+01	1.80E+01	3.00E+01			1.50E+01	1.50E+01	1.50E+01	3.00E+01	1.50E+01
Reportable Level		3.00E+04	2.00E+02	1.00E+03	3.00E+02	3.00E+01	5.00E+01	4.00E+02				2.00E+02	1.00E+03	4.00E+02	3.00E+02	4.00E+02



**Graph 2 -- 2011 Environmental Surface Water  
Tritium Results**



## **E. Surface Drinking Water Program**

Surface drinking water was collected at two monitoring locations. Table 1 -- Comanche Peak Nuclear Power Plant Radiological Environmental Monitoring Program for 2011 details the location and types of analysis required. Samples of water from Squaw Creek reservoir were collected at the monitoring location NNW-0.1 and analyzed at detection levels required for drinking water standards even though the water is not allowed to be used as potable water. There is not a surface water drinking source within a mile of CPNPP. Monitoring location N-9.9 was used as a surface drinking water location based on the proximity of the City of Granbury intake to the Granbury potable water system. All surface drinking water samples were collected weekly and then composited for Iodine-131 analysis, gamma isotopic analysis, and gross beta analysis on a monthly basis. Tritium analysis was performed on a quarterly basis.

**For the year 2011**, all samples were analyzed for gamma emitting radionuclides. The results are reported in Table 8 – Environmental Surface Drinking Water Tritium, Gross Beta and Gamma Isotopic Results. There were no gamma emitting radionuclides identified in any of the twenty-four composite samples. Tritium reported in Squaw Creek reservoir ranged from **1.46E+04 pCi/l to 1.68E+04 pCi/l** and **averaged 1.60E+04 pCi/l**. Tritium reported from all Lake Granbury water samples indicated less than the required LLD as expected. Graph 4 – 2011 Environmental Surface Drinking Water Tritium Results trends the results reported for the year 2011. Gross Beta results at the indicator location NNW-0.1 ranged from **<1.4E+01 pCi/l to 2.8E+01 pCi/l** with an average of **2.23+01 pCi/l**. Gross Beta results at the control location N-9.9 ranged from **4.5E+00 pCi/l to 1.5E+01 pCi/l** with an average of **1.01+01 pCi/l**. Graph 5 – 2011 Environmental Surface Drinking Water Gross Beta Results trends the gross beta results for the two monitor locations and indicates no influence from Comanche Peak in the levels detected in the two different bodies of water. Past gross beta results for Lake Granbury have been as high as **83 pCi/l**. The gross beta results received are within values previously reported and there is no reportable level for gross beta so no action is required at this time.

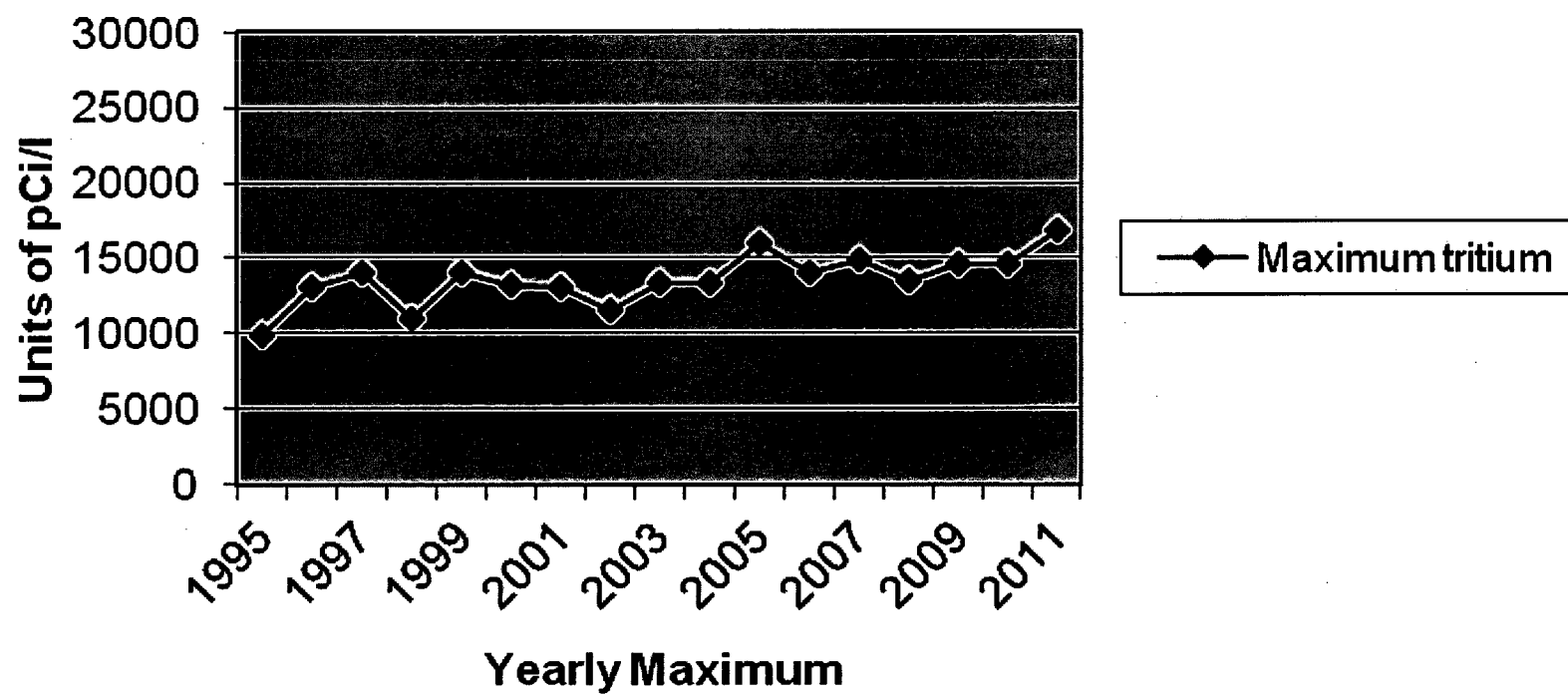
**During the year 2011, there were no exceptions to the Surface Drinking Water Program.**



**Table 8 -- 2011 Environmental Surface Drinking Water Tritium, Gross Beta and Gamma Isotopic Results  
(Units of pCi/l)**

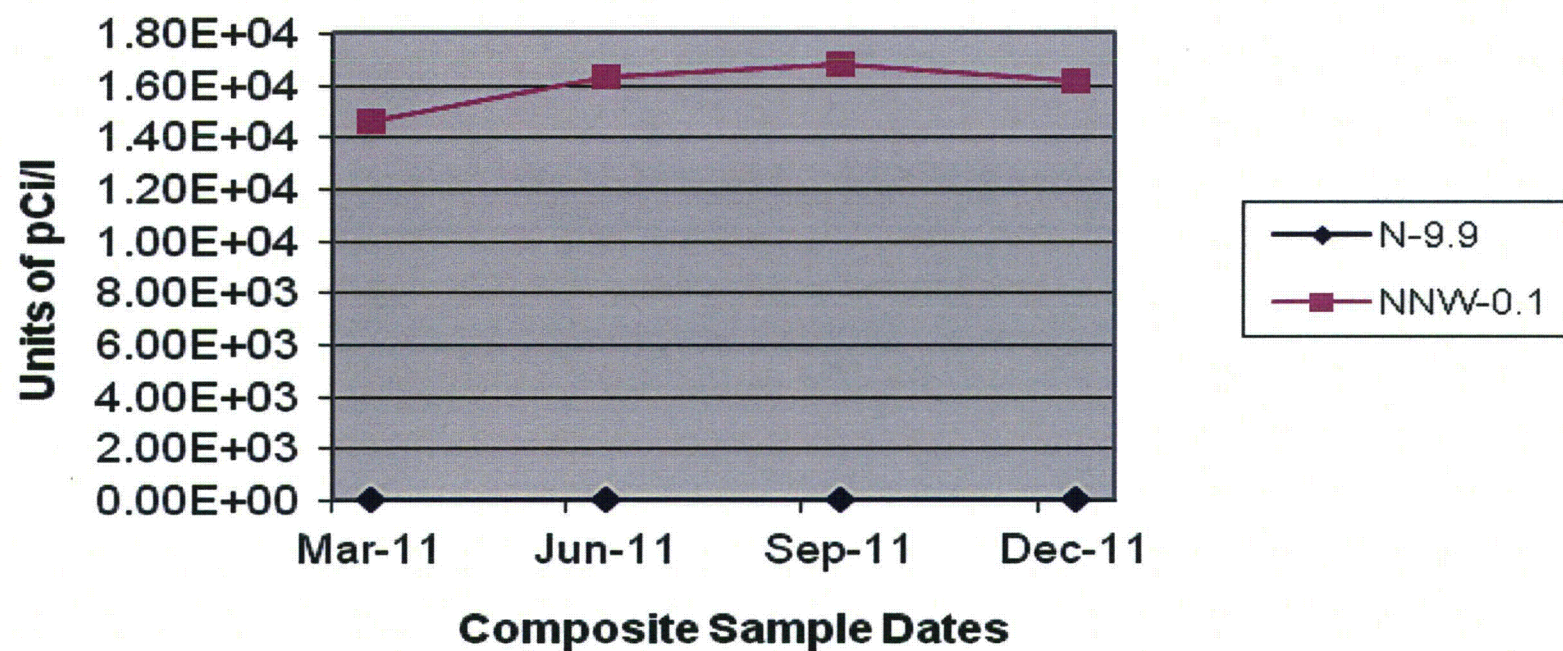
	SW-6		Gross	Nuclides											
Date	Location	H-3	Beta	I-131	Ba-140	Co-58	Co-60	Cs-134	Cs-137	Fe-59	La-140	Mn-54	Nb-95	Zn-65	Zr-95
1/26/11	NNW-0.1		1.9E+01	<5.9E-01	<3.2E+00	<1.9E+00	<1.8E+00	<2.3E+00	<1.9E+00	<3.7E+00	<3.2E+00	<1.9E+00	<1.9E+00	<3.9E+00	<3.5E+00
2/23/11	NNW-0.1		1.9E+01	<5.1E-01	<3.9E+00	<2.1E+00	<2.4E+00	<2.6E+00	<2.1E+01	<4.2E+00	<3.9E+00	<1.9E+00	<2.0E+00	<4.3E+00	<3.5E+00
3/29/11	NNW-0.1	1.25E+04	2.8E+01	<5.1E-01	<3.8E+00	<2.1E+00	<2.7E+00	<2.7E+00	<2.2E+00	<4.3E+00	<3.8E+00	<2.1E+00	<2.1E+00	<4.5E+00	<3.9E+00
4/26/11	NNW-0.1		1.9E+01	<2.3E+01	<9.9E+00	<2.9E+00	<3.6E+00	<3.6E+00	<2.9E+00	<6.8E+00	<9.9E+00	<2.7E+00	<3.5E+00	<5.3E+00	<5.9E+00
5/31/11	NNW-0.1		1.9E+01	<8.4E+00	<5.9E+00	<2.1E+00	<2.2E+00	<2.4E+00	<2.0E+00	<5.2E+00	<5.9E+00	<1.9E+00	<2.4E+00	<4.4E+00	<3.9E+00
6/28/11	NNW-0.1	1.63E+04	1.4E+01	<9.1E+00	<6.5E+00	<2.3E+00	<2.2E+00	<2.3E+00	<2.2E+00	<4.3E+00	<6.5E+00	<1.9E+00	<2.4E+00	<3.9E+00	<4.4E+00
7/26/11	NNW-0.1		2.3E+01	<4.6E+00	<9.5E+00	<2.1E+00	<1.6E+00	<1.9E+00	<1.8E+00	<4.9E+00	<9.5E+00	<1.7E+00	<2.1E+00	<3.7E+00	<3.9E+00
8/30/11	NNW-0.1		2.1E+01	<9.8E-01	<7.5E+00	<2.6E+00	<2.5E+00	<2.7E+00	<2.5E+00	<6.2E+00	<7.5E+00	<2.4E+00	<3.0E+00	<4.9E+00	<4.6E+00
9/27/11	NNW-0.1	1.68E+04	1.9E+01	<1.3E+01	<1.2E+01	<3.1E+00	<3.1E+00	<3.8E+00	<3.3E+00	<8.2E+00	<1.2E+01	<3.1E+00	<3.7E+00	<6.7E+00	<6.8E+00
10/25/11	NNW-0.1		2.1E+01	<9.3E+00	<7.1E+00	<2.1E+00	<2.2E+00	<2.3E+00	<1.9E+00	<4.6E+00	<7.1E+00	<1.8E+00	<2.2E+00	<3.9E+00	<3.9E+00
11/29/11	NNW-0.1		<1.4E+01	<8.9E-01	<4.1E+00	<1.7E+00	<1.5E+00	<1.8E+00	<1.5E+00	<3.5E+00	<4.1E+00	<1.4E+00	<1.8E+00	<3.1E+00	<3.0E+00
12/27/11	NNW-0.1	1.62E+04	1.9E+01	<6.9E-01	<6.4E+00	<2.1E+00	<1.9E+00	<2.2E+00	<2.2E+00	<4.2E+00	<6.4E+00	<1.7E+00	<2.0E+00	<3.8E+00	<3.9E+00
			Gross												
	SW-2	H-3	Beta	I-131	Ba-140	Co-58	Co-60	Cs-134	Cs-137	Fe-59	La-140	Mn-54	Nb-95	Zn-65	Zr-95
1/26/11	N-9.9		8.7E+00	<7.6E-01	<2.6E+00	<1.5E+00	<1.7E+00	<1.9E+00	<1.7E+00	<3.2E+00	<2.6E+00	<1.5E+00	<1.6E+00	<3.2E+00	<2.8E+00
2/23/11	N-9.9		4.5E+00	<6.3E-01	<3.4E+00	<1.8E+00	<1.9E+00	<2.2E+00	<1.9E+00	<4.0E+00	<3.4E+00	<1.9E+00	<1.9E+00	<4.0E+00	<3.3E+00
3/29/11	N-9.9	<4.9E+02	8.9E+00	<5.2E-01	<4.3E+00	<2.6E+00	<2.6E+00	<3.2E+00	<2.7E+00	<5.4E+00	<4.3E+00	<2.6E+00	<2.6E+00	<5.0E+00	<4.4E+00
4/26/11	N-9.9		5.9E+00	<2.1E+01	<1.1E+01	<3.4E+00	<3.2E+00	<3.5E+00	<5.0E+00	<7.6E+00	<1.2E+01	<3.1E+00	<3.7E+00	<5.1E+00	<5.8E+00
5/31/11	N-9.9		6.6E+00	<7.4E+00	<4.9E+00	<1.7E+00	<1.7E+00	<1.9E+00	<1.6E+00	<3.6E+00	<4.9E+00	<1.5E+00	<1.9E+00	<3.5E+00	<3.2E+00
6/28/11	N-9.9	<3.92E+02	1.3E+01	<9.8E+00	<8.4E+00	<2.5E+00	<2.6E+00	<2.4E+00	<2.1E+00	<5.0E+00	<8.4E+00	<2.4E+00	<2.9E+00	<4.7E+00	<4.2E+00
7/26/11	N-9.9		9.5E+00	<2.4E+00	<1.4E+01	<2.4E+00	<1.9E+00	<2.5E+00	<3.5E+00	<6.7E+00	<1.4E+01	<2.0E+00	<2.6E+00	<4.6E+00	<4.6E+00
8/30/11	N-9.9		1.3E+01	<1.2E+00	<8.8E+00	<3.3E+00	<3.3E+00	<3.1E+00	<2.9E+00	<7.6E+00	<8.8E+00	<2.7E+00	<3.3E+00	<6.4E+00	<5.9E+00
9/27/11	N-9.9	<4.74E+02	1.5E+01	<1.3E-01	<7.4E+00	<2.5E+00	<2.1E+00	<2.6E+00	<2.2E+00	<5.8E+00	<7.4E+00	<2.3E+00	<2.9E+00	<5.3E+00	<4.9E+00
10/25/11	N-9.9		1.1E+01	<9.5E+00	<5.9E+00	<1.8E+00	<1.8E+00	<2.0E+00	<1.8E+00	<4.1E+00	<5.9E+00	<1.7E+00	<2.2E+00	<3.8E+00	<3.0E+00
11/29/11	N-9.9		1.3E+01	<8.9E-01	<6.0E+00	<2.3E+00	<2.6E+00	<2.7E+00	<2.2E+00	<5.4E+00	<6.0E+00	<1.9E+00	<2.3E+00	<4.1E+00	<4.3E+00
12/27/11	N-9.9	<3.97E+02	8.3E+00	<9.9E-01	<7.8E+00	<2.4E+00	<2.3E+00	<2.6E+00	<2.4E+00	<5.5E+00	<7.8E+00	<2.1E+00	<2.7E+00	<4.6E+00	<4.3E+00
Required LLD's		2.00E+03	4.00E+00	1.00E+00	1.50E+01	1.50E+01	1.50E+01	1.50E+01	1.80E+01	3.00E+01	1.50E+01	1.50E+01	1.50E+01	3.00E+01	1.50E+01
Reportable Level		2.00E+04	None	2.00E+00	2.00E+02	1.00E+03	3.00E+02	3.00E+01	5.00E+01	4.00E+02	2.00E+02	1.00E+03	4.00E+02	3.00E+02	4.00E+02

**Graph 3 -- Squaw Creek Maximum Tritium Values**

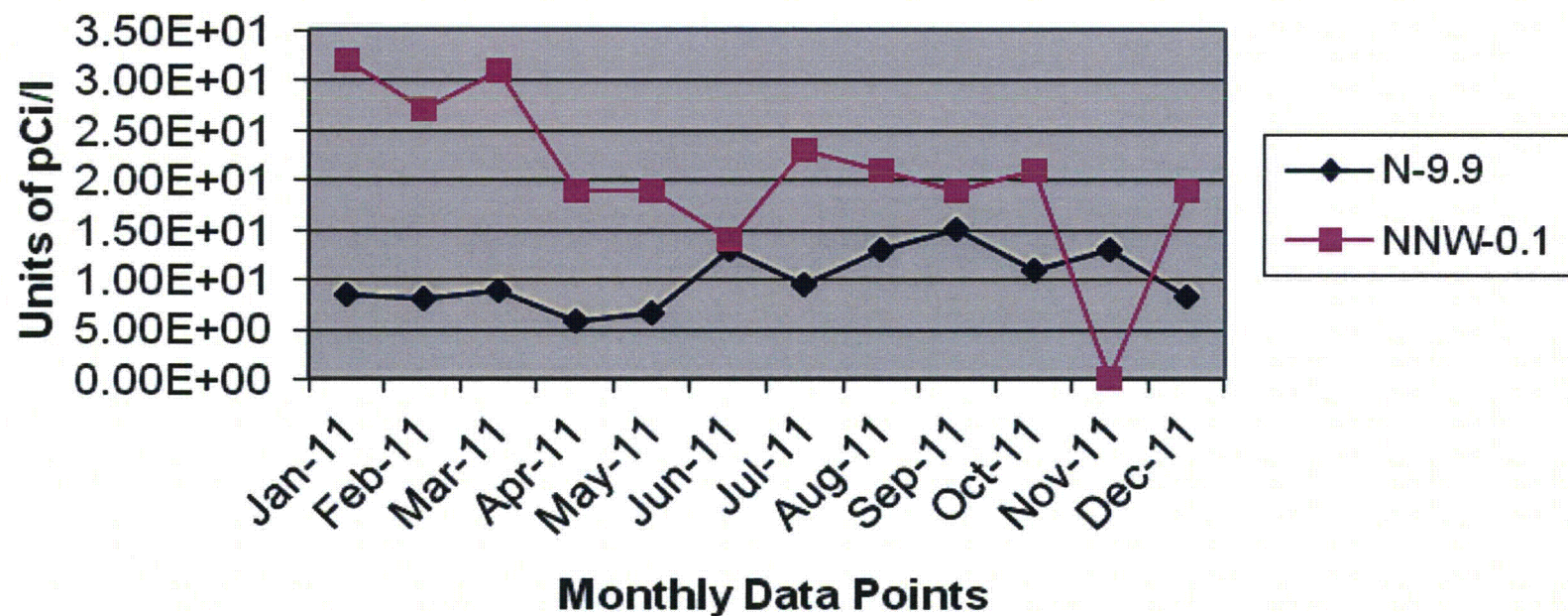




**Graph 4 -- 2011 Environmental Surface Drinking Water Tritium Results**



**Graph 5 -- 2011 Environmental Surface Drinking Water Gross Beta Results**



## **F. Ground Water Program**

Table 1 – Comanche Peak Nuclear Power Plant Radiological Environmental Monitoring Program for 2011 specifies the five groundwater monitoring locations. Groundwater supplies in the site area are not affected by plant effluents and are sampled only to provide confirmation that groundwater is not affected by plant discharges. Groundwater samples were collected quarterly and analyzed for gamma isotopes and tritium at each location.

**For the year 2011** a total of twenty groundwater samples were collected from the five different monitoring locations. There were no radionuclides identified in any of the samples. All required LLDs were met for each required gamma emitting radionuclide. Tritium analysis was performed on twenty samples, all indicated less than the required LLD. Results for all the groundwater analyses are reported in Table 9 - 2011 Environmental Groundwater Tritium and Gamma Isotopic Results. These results confirm that plant discharges are having no effect on groundwater in the area surrounding Comanche Peak.

The 2010 samples of perched groundwater were taken quarterly in accordance with ENV-323, "TRITIUM GROUNDWATER MONITORING PROGRAM". A sample from the Drainage Flow Catch Basin had a positive value of 6.45 E-6 microcuries/cc (6450 picocuries/liter) for Tritium. The 2011 sample from the Drainage Flow Catch Basin had values ranging from 5030 to 10400 picocuries/liter for Tritium. The sample from the Water Production plant leachate pond A had a positive value ranging from 2050 picocuries/liter to 12100 picocuries/liter. Variations in the tritium values from the Pond A Leachate are thought to come from pockets of water trapped in between the inner and outer liner by many inches of lake sediment resting on top of the liner. These pockets of water are from basin water previously transferred to the space between the liners to test for liner repair work effectiveness. Work is in progress to remove this sediment from the pond. As the sediment is removed, pockets of residual basin water are reintroduced into the Leachate sample. No further evaluation is necessary. These have been documented in CR-2011-003303, CR 2011-009873 and CR-2011-010251.

**During the year 2011, there were no exceptions to the Ground Water Program.**



**Table 9 -- 2011 Environmental Groundwater Tritium and Gamma Isotopic Results  
(Units of pCi/l)**

		Nuclides												
	Location	H-3	Ba-140	Co-58	Co-60	Cs-134	Cs-137	Fe-59	I-131	La-140	Mn-54	Nb-95	Zn-65	Zr-95
<b>Date</b>	<b>GW-3</b>													
3/29/11	SSE-4.6	<1.8E+02	<3.8E+00	<2.1E+00	<2.2E+00	<2.4E+00	<2.2E+00	<4.5E+00	<3.7E+00	<3.8E+00	<2.1E+00	<2.3E+00	<4.1E+00	<3.8E+00
6/28/11	SSE-4.6	<3.8E+02	<4.1E+00	<2.1E+00	<2.7E+00	<2.8E+00	<3.6E+00	<5.1E+00	<3.9E+00	<4.1E+00	<2.2E+00	<2.4E+00	<4.9E+00	<3.9E+00
9/27/11	SSE-4.6	<5.8E+02	<4.4E+00	<2.8E+00	<2.3E+00	<3.1E+00	<2.8E+00	<5.1E+00	<5.8E+00	<4.4E+00	<2.5E+00	<3.2E+00	<4.3E+00	<4.7E+00
12/27/11	SSE-4.6	<4.1E+02	<3.8E+00	<1.9E+00	<1.8E+00	<2.2E+00	<1.9E+00	<4.1E+00	<4.3E+00	<3.8E+00	<1.8E+00	<1.9E+00	<4.2E+00	<3.3E+00
	<b>GW-5</b>													
3/29/11	N-1.45	<1.7E+02	<3.1E+00	<1.7E+00	<1.9E+00	<2.4E+00	<1.9E+00	<3.8E+00	<3.8E+00	<3.1E+00	<1.9E+00	<2.0E+00	<3.9E+00	<3.4E+00
6/28/11	N-1.45	<3.8E+02	<3.3E+00	<1.9E+00	<2.1E+00	<2.4E+00	<2.0E+00	<4.0E+00	<3.8E+00	<3.3E+00	<1.9E+00	<2.2E+00	<4.1E+00	<3.5E+00
9/27/11	N-1.45	<5.9E+02	<4.0E+00	<2.0E+00	<2.4E+00	<2.3E+00	<2.5E+00	<4.5E+00	<4.2E+00	<4.0E+00	<1.9E+00	<2.3E+00	<4.5E+00	<3.9E+00
12/27/11	N-1.45	<4.0E+02	<3.0E+00	<1.6E+00	<1.7E+00	<2.1E+00	<2.0E+00	<3.4E+00	<3.8E+00	<3.0E+00	<1.7E+00	<1.9E+00	<3.3E+00	<2.9E+00
	<b>GW-4</b>													
3/29/11	N-9.8	<1.7E+02	<3.8E+00	<2.3E+00	<2.4E+00	<2.9E+00	<3.9E+00	<4.9E+00	<3.8E+00	<3.8E+00	<2.2E+00	<2.4E+00	<4.8E+00	<3.9E+00
6/28/11	N-9.8	<3.7E+02	<3.4E+00	<1.8E+00	<2.2E+00	<2.2E+00	<2.0E+00	<3.9E+00	<4.1E+00	<3.4E+00	<2.0E+00	<2.2E+00	<3.8E+00	<3.4E+00
9/27/11	N-9.8	<5.8E+02	<4.9E+00	<2.7E+00	<2.8E+00	<3.8E+00	<2.7E+00	<5.3E+00	<6.2E+00	<4.9E+00	<3.0E+00	<3.2E+00	<5.3E+00	<4.9E+00
12/27/11	N-9.8	<4.1E+02	<3.4E+00	<1.7E+00	<1.9E+00	<2.2E+00	<1.9E+00	<3.7E+00	<3.9E+00	<3.4E+00	<1.8E+00	<1.9E+00	<3.9E+00	<3.1E+00
	<b>GW-1</b>													
3/29/11	W-1.2	<1.8E+02	<2.8E+00	<1.9E+00	<1.7E+00	<2.2E+00	<1.9E+00	<3.0E+00	<3.4E+00	<2.8E+00	<1.7E+00	<1.7E+00	<3.6E+00	<2.9E+00
6/28/11	W-1.2	<3.7E+02	<2.9E+00	<1.8E+00	<2.1E+00	<2.2E+00	<1.8E+00	<3.5E+00	<3.3E+00	<2.9E+00	<1.6E+00	<1.9E+00	<3.9E+00	<2.9E+00
9/27/11	W-1.2	<5.8E+02	<4.3E+00	<2.7E+00	<3.3E+00	<3.7E+00	<2.9E+00	<6.3E+00	<5.3E+00	<4.3E+00	<2.4E+00	<3.3E+00	<5.2E+00	<4.8E+00
12/27/11	W-1.2	<4.0E+02	<2.9E+00	<1.7E+00	<1.8E+00	<1.9E+00	<1.7E+00	<3.5E+00	<3.7E+00	<2.9E+00	<1.5E+00	<1.8E+00	<3.2E+00	<3.2E+00
	<b>GW-2</b>													
3/29/11	WSW-0.1	<1.7E+02	<3.3E+00	<2.1E+00	<2.1E+00	<2.4E+00	<2.4E+00	<4.1E+00	<3.9E+00	<3.3E+00	<1.9E+00	<2.3E+00	<4.3E+00	<3.8E+00
6/28/11	WSW-0.1	<3.8E+02	<5.3E+00	<2.8E+00	<3.2E+00	<3.7E+00	<2.9E+00	<5.6E+00	<4.6E+00	<5.3E+00	<2.7E+00	<2.6E+00	<6.7E+00	<5.0E+00
9/27/11	WSW-0.1	<5.8E+02	<4.2E+00	<2.3E+00	<2.9E+00	<3.0E+00	<3.0E+00	<5.1E+00	<4.7E+00	<4.2E+00	<2.2E+00	<2.6E+00	<4.8E+00	<4.6E+00
12/27/11	WSW-0.1	<4.0E+02	<4.4E+00	<2.5E+00	<2.7E+00	<3.2E+00	<2.6E+00	<5.3E+00	<4.5E+00	<4.4E+00	<2.3E+00	<2.6E+00	<4.9E+00	<3.8E+00
Required LLD's		3.00E+03	1.50E+01	1.50E+01	1.50E+01	1.50E+01	1.80E+01	3.00E+01	1.50E+01	1.50E+01	1.50E+01	1.50E+01	3.00E+01	1.50E+01
Reportable Levels		2.00E+04	2.00E+02	1.00E+03	3.00E+02	3.00E+01	5.00E+01	4.00E+02	2.00E+01	2.00E+02	1.00E+03	4.00E+02	3.00E+02	4.00E+02



## **G. Sediment Program**

Shoreline sediments were collected at four different monitoring locations. One sample location is along the shore of Squaw Creek Reservoir, one sample location is on Squaw Creek down stream of the dam discharge and two locations are along Lake Granbury's shores. Each sample is collected on a six-month frequency and sent to the contract laboratory for analysis by gamma spectrometry.

The process of shoreline sedimentation is a complex evolution whereby potential radionuclides and stable elements may concentrate in the bottom sediment of particular bodies of water. The concentrations are effected by such things as colloidal particles combining with chelating agents and biological action of bacteria and other benthic organisms. Monitoring of the area shorelines provides one of the first and best indicators of radionuclide deposition.

**For the year 2011** results from the gamma isotopic analysis of shoreline sediments is reported in Table 10 – 2011 Environmental Sediment Gamma Isotopic Results. As expected and in agreement with previous results from both the pre-operational and operational programs, naturally occurring Potassium-40 was detected in all eight samples. All required radionuclide results were reported as less than the required LLDs. During previous years, both pre-operational and operational, positive indications occasionally had been noted for Cesium-137 and during 2011 there were two positive Cesium-137 results reported. The results were below the LLD. As expected, there were no results in any sediment sample that indicated any direct influence from CPNPP discharges to the local environment.

**During the year 2011, there were no exceptions to the Sediment Program.**

**Table 10 -- 2011 Environmental Sediment Gamma Isotopic Results  
(Units of pCi/kg)**

Date	Location	Nuclides	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	I-131	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
		Ba-140													
1/11/11	SE-5.3	<1.8E+02	<4.9E+02	<4.1E+01	<4.1E+01	<5.7E+01	<4.5E+01	<1.3E+02	<5.4E+02	3.3E+03	<1.8E+02	<4.9E+01	<6.1E+01	<9.6E+01	<1.0E+02
1/11/11	NNE-1.0	<3.0E+02	<6.4E+02	<6.1E+01	<4.7E+01	<6.2E+01	1.5E+02	<1.3E+02	<5.7E+02	4.8E+03	<3.0E+02	<5.9E+01	<7.4E+01	<1.4E+02	<9.3E+01
1/11/11	NE-7.4	<2.6E+02	<5.3E+02	<5.4E+01	<4.9E+01	<6.3E+01	<4.2E+01	<1.2E+02	<5.9E+02	3.9E+03	<2.6E+02	<5.4E+01	<7.2E+01	<1.5E+02	<1.1E+02
1/11/11	N-9.9	<3.7E+02	<5.4E+02	<6.0E+01	<4.2E+01	<6.2E+01	<5.3E+01	<1.4E+02	<5.3E+02	1.9E+03	<3.7E+02	<5.7E+01	<7.9E+01	<1.3E+02	<1.6E+02
7/5/11	SE-5.3	<2.2E+02	<4.7E+02	<4.1E+01	<4.0E+01	<5.4E+01	<4.7E+01	<9.4E+01	<4.6E+02	4.3E+03	<2.2E+02	<3.8E+01	<5.4E+01	<8.3E+01	<8.2E+01
7/5/11	NNE-1.0	<2.3E+02	<5.9E+02	<5.7E+01	<5.0E+01	<7.7E+01	1.5E+02	<1.6E+02	<5.8E+02	5.9E+03	<2.3E+02	<5.9E+01	<7.8E+01	<1.4E+02	<1.2E+02
7/5/11	NE-7.4	<2.0E+02	<5.1E+02	<5.6E+01	<4.0E+01	<5.8E+01	<4.3E+01	<1.1E+02	<4.5E+02	4.4E+03	<2.0E+02	<4.7E+01	<5.8E+01	<1.1E+02	<1.0E+02
7/5/11	N-9.9	<1.9E+02	<3.2E+02	<3.1E+01	<3.8E+01	<3.8E+01	<3.6E+01	<9.3E+01	<3.6E+02	2.2E+03	<1.9E+02	<3.2E+01	<4.2E+01	<7.2E+01	<6.1E+01
Required LLD's						1.50E+02	1.80E+02								
Reportable Levels						None	None								

**NOTE:** During previous years, both pre-operational and operational, positive indications occasionally had been noted for Cesium-137 and during 2011 there were two positive Cesium-137 results reported. The results were below the required LLD.

## **H. Fish Program**

Fish samples were collected at two locations during the year 2011. One monitoring location is an area approximately two miles east-northeast of the site on Squaw Creek Reservoir. The second location is on Lake Granbury approximately eight miles north-northeast of the site. Fish sampling is scheduled for the months of April and October. The collected fish are frozen and shipped to the independent laboratory where the edible portions are analyzed for gamma emitting radio-nuclides.

**For the year 2011**, the results of the analysis performed on the collected fish samples are reported in Table 11 -- 2011 Environmental Fish Gamma Isotopic Results. Catfish and Bass samples, with an exception of Lake Granbury Bass, were analyzed as indicated in the table. After multiple attempts, the Lake Granbury bass sample for October could not be collected due to the drought. The drought restricted access to the sample location; in addition to there being little to no bass available (CR 2011-10945). There were no positive results reported except for the expected Potassium-40, which is naturally occurring in all living organisms. All required radionuclide results were reported as less than the required LLDs. As a result of the fish-sampling program, there were no anomalies noted and no indication of any influence on the surrounding environment from Comanche Peak plant discharges.

No abnormal results were reported by CPNPP or by the State of Texas. As expected, Potassium-40 was the only positive isotope found.

**During the year 2011, CR-2011-10945 was the only exceptions to the Fish Program.**

**Table 11 -- 2011 Environmental Fish Gamma Isotopic Results**  
(Units of pCi/kg wet)

		Nuclides													Fish Type
		Ba-140	Co-58	Co-60	Cs-134	Cs-137	Fe-59	I-131	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95	
<b>Date</b>	<b>Location</b>														
3/26/11	Squaw Creek	<1.1E-01	<1.1E-02	<7.9E-03	<1.1E-02	<8.9E-03	<4.1E-02	<4.1E-01	2.8E+00	<1.1E-01	<8.5E-03	<1.3E-02	<2.4E-02	<2.5E-02	<b>Catfish</b>
3/27/11	Squaw Creek	<1.1E-01	<1.3E-02	<1.1E-02	<1.2E-03	<1.1E-02	<4.0E-02	<4.1E-01	3.1E+00	<1.1E-01	<8.7E-03	<1.4E-02	<2.5E-02	<2.5E-02	<b>Bass</b>
09/28/11	Squaw Creek	<2.6E-02	<8.9E-03	<8.3E-03	<9.3E-03	<9.3E-03	<2.6E-02	<5.0E-02	3.4E+00	<2.6E-02	<8.6E-03	<9.5E-03	<1.9E-02	<1.7E-02	<b>Catfish</b>
09/28/11	Squaw Creek	<2.3E-02	<8.9E-03	<9.9E-03	<7.8E-03	<7.3E-03	<2.4E-02	<4.8E-02	3.2E+00	<2.3E-02	<7.8E-03	<9.1E-03	<1.9E-02	<1.3E-02	<b>Bass</b>
4/02/11	Lake Granbury	<9.4E-02	<1.2E-02	<1.1E-02	<1.3E-02	<9.4E-03	<3.4E-02	<2.4E-01	2.9E+00	<9.4E-02	<9.8E-03	<1.2E-02	<2.7E-02	<2.1E-02	<b>Carp</b>
4/09/11	Lake Granbury	<5.9E-02	<1.0E-02	<9.8E-03	<9.6E-03	<7.8E-03	<2.7E-02	<1.1E-01	2.9E+00	<5.9E-02	<8.4E-03	<1.2E-02	<2.2E-02	<1.8E-02	<b>Bass</b>
10/02/11	Lake Granbury	<2.7E-02	<1.1E-02	<9.1E-03	<7.9E-03	<1.4E-02	<2.5E-02	<3.8E-02	3.3E+00	<2.7E-02	<9.9E-03	<1.0E-02	<2.7E-02	<1.7E-02	<b>Catfish</b>
10/04/11	Lake Granbury	CR 2011-10945													<b>Bass</b>
Required LLD's			1.30E+02	1.30E+02	1.30E+02	1.50E+02	2.60E+02				1.30E+02		2.60E+02		
Reportable Levels			3.00E+04	1.00E+04	1.00E+03	2.00E+03	1.00E+04				3.00E+04		2.00E+04		



## **I. Food Products Program**

Food products (pecan) were collected at the time of harvest. The samples are obtained at monitoring location ENE-9.0 and are shipped to the contract laboratory for gamma isotopic analysis.

**For the year 2011**, results of the gamma isotopic analyses are reported in Table 12 -- 2011 Environmental Food Products Gamma Isotopic Results. Naturally occurring Potassium 40 was detected in the sample as expected Cesium-137 was detected in one sample, but was below the required Lower Level of Detection (LLD).

**During the year 2011, there were no exceptions to the Food Products Program.**

**Table 12 -- 2011 Environmental Food Products Gamma Isotopic Results  
(Units of pCi/kg wet)**

Food Type – Pecans															
		Nuclides													
		Ba-140	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	I-131	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
Date	Location														
11/08/11	ENE-9.0	<1.5E+01	<6.1E+01	<9.1E+00	<9.8E+00	<1.0E+01	9.4E+00	<1.8E+01	<2.1E+01	2.4E+03	<1.5E+01	<7.8E+00	<8.8E+00	<1.9E+01	<1.6E+01
Required LLD's						6.00E+01	8.00E+01		6.00E+01						
Reportable Levels						1.00E+03	2.00E+03		1.00E+02						

## **J. Broadleaf Program**

Broadleaf sample collection is conducted in accordance with the requirements of the Radiological Environmental Monitoring Program. The program specifies the sampling based on the absence of milk monitoring locations. One broadleaf control location is located at SW-13.5 in the vicinity of the previous control milk location. The two indicator locations, N-1.45 and SW-1.0, are located near the site boundaries. The broadleaf samples consist of mainly native grasses and cedar leaves and are analyzed for Iodine-131 and gamma emitting isotopes.

**For the year 2011**, all radionuclide analysis met their required LLDs. All three (3) sample collection locations identified Iodine-131 during the March 29, 2011 samples. The I-131 activity was consistent with the control sample data and is a result of the nuclear incident at Fukushima. The naturally occurring radionuclide of Potassium-40 was found in 36 of 36 samples taken. The radionuclide Beryllium-7 was present in 36 of 36 samples. Positive results for Cesium-137 were present in 2 of 36 samples taken March 29<sup>th</sup> and April 26<sup>th</sup> 2011. This was also attributed to the Fukushima incident.

No abnormal results were reported by CPNPP or by the State of Texas.

**During the year 2011, there were no exception to the Broadleaf Program other than the samples attributed to Fukushima.**



**Table 13 -- 2011 Environmental Broadleaf Iodine-131 and Gamma Isotopic Results**  
(Units of pCi/kg wet)

		Nuclides													
	BL-1	I-131	Ba-140	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
Date	Location														
1/25/11	N-1.45	<2.5E+01	<2.6E+01	3.8E+03	<1.4E+01	<1.6E+01	<1.7E+01	<1.5E+01	<2.6E+01	1.2E+03	<2.6E+01	<1.4E+01	<1.5E+01	<2.9E+01	<2.6E+01
2/22/11	N-1.45	<3.0E+01	<2.6E+01	5.9E+02	<2.4E+01	<2.4E+01	<6.0E+01	<8.0E+01	<5.0E+01	8.8E+03	<2.6E+01	<2.1E+01	<2.3E+01	<5.1E+01	<3.8E+01
3/29/11	N-1.45	2.4E+02	<4.6E+01	4.5E+03	<3.3E+01	<4.3E+01	<4.9E+01	<3.9E+01	<7.0E+01	2.2E+03	<4.6E+01	<3.6E+01	<4.2E+01	<7.7E+01	<6.0E+01
4/26/11	N-1.45	<1.3E+02	<7.3E+01	3.2E+03	<2.2E+01	<2.1E+01	<2.2E+01	<2.0E+01	<4.8E+01	3.2E+03	<7.3E+01	<1.9E+01	<2.3E+01	<4.1E+01	<4.1E+01
5/31/11	N-1.45	<2.4E+01	<1.8E+01	3.0E+03	<9.8E+00	2.2E+01	<1.2E+01	<1.0E+01	<2.2E+01	3.5E+03	<1.8E+01	<9.7E+00	<1.1E+01	<2.2E+01	<1.8E+01
6/28/11	N-1.45	<2.2E+01	<1.9E+01	1.3E+03	<1.0E+01	<1.3E+01	<1.2E+01	<1.3E+01	<2.4E+01	3.3E+03	<1.9E+01	<9.3E+00	<9.8E+00	<2.4E+01	<1.8E+01
7/26/11	N-1.45	<2.4E+01	<2.1E+01	1.2E+03	<1.2E+01	<1.5E+01	<1.5E+01	<1.3E+01	<2.9E+01	3.6E+03	<2.1E+01	<1.1E+01	<1.4E+01	<3.0E+01	<2.3E+01
8/30/11	N-1.45	<1.4E+01	<1.8E+01	1.5E+03	<1.1E+01	<1.4E+01	<1.5E+01	<1.5E+01	<2.4E+01	2.9E+03	<1.8E+01	<1.2E+01	<1.1E+01	<2.6E+01	<1.9E+01
9/27/11	N-1.45	<2.1E+01	<2.1E+01	1.6E+02	<1.3E+01	<1.6E+01	<1.7E+01	<1.5E+01	<2.9E+01	3.2E+03	<2.1E+01	<1.4E+01	<1.5E+01	<3.2E+01	<2.6E+01
10/25/11	N-1.45	<2.5E+01	<2.1E+01	2.5E+03	<1.4E+01	<1.6E+01	<1.9E+01	<1.5E+01	<2.9E+01	2.7E+03	<2.1E+01	<1.4E+01	<1.5E+01	<3.3E+01	<2.3E+01
11/29/11	N-1.45	<1.9E+01	<1.9E+01	2.9E+03	<1.4E+01	<1.7E+01	<1.8E+01	<1.5E+01	<3.1E+01	4.2E+03	<1.9E+01	<1.5E+01	<1.5E+01	<3.3E+01	<2.6E+01
12/27/11	N-1.45	<2.6E+01	<2.1E+01	2.7E+03	<1.4E+01	<1.4E+04	<1.8E+01	<1.4E+01	<2.9E+01	2.9E+03	<2.1E+01	<1.4E+01	<1.4E+01	<2.9E+01	<2.4E+01
	BL-3	I-131	Ba-140	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
	Control														
1/25/11	SW-13.5	<4.3E+01	<3.9E+01	5.6E+03	<2.8E+01	<3.0E+01	<3.4E+01	<2.9E+01	<5.3E+01	1.9E+03	<3.9E+01	<2.6E+01	<2.8E+01	<5.5E+01	<4.7E+01
2/22/11	SW-13.5	<2.8E+01	<2.9E+01	3.9E+03	<1.9E+01	<1.9E+01	<2.3E+01	<2.1E+01	<3.7E+01	2.4E+03	<2.9E+01	<1.9E+01	<2.1E+01	<4.3E+01	<3.5E+01
3/29/11	SW-13.5	5.6E+01	<3.9E+01	4.2E+03	<2.8E+01	<2.4E+01	<2.9E+01	<2.7E+01	<5.2E+01	1.5E+03	<3.9E+01	<2.6E+01	<2.7E+01	<5.6E+01	<4.5E+01
4/26/11	SW-13.5	<1.5E+02	<9.4E+01	4.2E+03	<2.7E+01	<3.1E+01	<3.3E+01	<2.6E+01	<8.2E+01	1.9E+03	<9.4E+01	<2.7E+01	<2.9E+01	<5.7E+01	<5.0E+01
5/31/11	SW-13.5	<3.6E+01	<3.4E+01	6.9E+02	<1.6E+01	<1.5E+01	<1.8E+01	<1.6E+01	<3.7E+01	3.7E+03	<3.4E+01	<1.6E+01	<1.7E+01	<4.0E+01	<3.1E+01
6/28/11	SW-13.5	<2.8E+01	<2.7E+01	8.5E+02	<1.5E+01	<1.7E+01	<1.7E+01	<1.5E+01	<3.4E+01	4.5E+03	<2.7E+01	<1.3E+01	<1.5E+01	<3.6E+01	<2.6E+01
7/26/11	SW-13.5	<4.3E+01	<4.2E+01	4.9E+02	<2.2E+01	<2.7E+01	<2.4E+01	<1.9E+01	<4.8E+01	3.9E+03	<4.2E+01	<2.0E+01	<2.0E+01	<4.2E+01	<3.7E+01
8/30/11	SW-13.5	<1.9E+01	<1.9E+01	1.6E+03	<1.2E+01	<1.5E+01	<1.6E+01	<1.4E+01	<2.7E+01	3.0E+03	<1.9E+01	<1.3E+01	<1.4E+01	<3.0E+01	<2.3E+01
9/27/11	SW-13.5	<2.4E+01	<2.2E+01	7.6E+02	<1.3E+01	<1.6E+01	<1.7E+01	<1.5E+01	<3.3E+01	2.8E+03	<2.2E+01	<1.4E+01	<1.5E+01	<3.0E+01	<2.6E+01
10/25/11	SW-13.5	<1.9E+01	<2.4E+01	5.1E+02	<1.3E+01	<1.4E+01	<1.8E+01	<1.4E+01	<3.2E+01	4.0E+03	<2.4E+01	<1.4E+01	<1.5E+01	<3.5E+01	<2.4E+01
11/29/11	SW-13.5	<9.9E+00	<8.4E+00	8.4E+02	<7.6E+00	<9.6E+00	<1.0E+01	<8.4E+00	<1.9E+01	8.1E+03	<8.4E+00	<8.2E+00	<8.3E+00	<2.2E+01	<1.4E+01
12/27/11	SW-13.5	<2.9E+01	<2.5E+01	6.7E+03	<1.6E+01	<1.7E+01	<1.9E+01	<1.9E+01	<3.9E+01	1.5E+03	<2.5E+01	<1.6E+01	<1.8E+01	<3.4E+01	<2.9E+01
	BL-2	I-131	Ba-140	Be-7	Co-58	Co-60	Cs-134	Cs-137	Fe-59	K-40	La-140	Mn-54	Nb-95	Zn-65	Zr-95
1/25/11	SW-1.0	<4.5E+01	<4.7E+01	4.7E+03	<2.7E+01	<3.3E+01	<3.6E+01	<2.8E+01	<6.2E+01	2.2E+03	<4.7E+01	<2.9E+01	<2.7E+01	<6.3E+01	<4.9E+01
2/22/11	SW-1.0	<2.9E+01	<2.8E+01	3.9E+03	<1.9E+01	<2.3E+01	<2.6E+01	<2.2E+01	<3.9E+01	2.4E+03	<2.8E+01	<2.2E+01	<2.2E+01	<4.3E+01	<3.7E+01
3/29/11	SW-1.0	1.1E+02	<3.8E+01	3.2E+03	<2.4E+01	<2.8E+01	<2.9E+01	2.4E+01	<5.4E+01	1.7E+03	<3.8E+01	<2.4E+01	<2.6E+01	<5.0E+01	<4.1E+01
4/26/11	SW-1.0	<5.6E+01	<3.6E+01	1.9E+03	<1.1E+01	<1.1E+01	<1.3E+01	1.2E+01	<2.5E+01	2.9E+03	<3.6E+01	<1.1E+01	<1.1E+01	<2.5E+01	<2.2E+01
5/31/11	SW-1.0	<4.5E+01	<3.6E+01	6.9E+02	<1.5E+01	<1.7E+01	<1.9E+01	<1.6E+01	<3.7E+01	3.5E+03	<3.6E+01	<1.6E+01	<1.8E+01	<3.5E+01	<3.1E+01
6/28/11	SW-1.0	<2.8E+01	<2.7E+01	1.0E+03	<1.3E+01	<1.8E+01	<1.7E+01	<2.5E+01	<3.4E+01	6.3E+03	<2.7E+01	<1.5E+01	<1.6E+01	<3.3E+01	<2.6E+01
7/26/11	SW-1.0	<7.7E+01	<6.8E+01	1.9E+03	<3.9E+01	<4.1E+01	<4.5E+01	<3.8E+01	<8.5E+01	1.3E+04	<6.8E+01	<3.8E+01	<4.2E+01	<9.2E+01	<6.7E+01
8/30/11	SW-1.0	<1.9E+01	<1.9E+01	9.6E+02	<1.4E+01	<1.5E+01	<1.6E+01	<1.4E+01	<2.7E+01	3.3E+03	<1.9E+01	<1.5E+01	<1.4E+01	<3.0E+01	<2.4E+01
9/27/11	SW-1.0	<2.3E+01	<1.9E+01	8.9E+02	<1.4E+01	<1.5E+01	<1.5E+01	<1.3E+01	<2.9E+01	4.5E+03	<1.9E+01	<1.3E+01	<1.5E+01	<2.9E+01	<2.3E+01
10/25/11	SW-1.0	<1.8E+01	<1.7E+01	2.9E+02	<1.0E+01	<1.3E+01	<1.4E+01	<1.1E+01	<2.5E+01	3.9E+03	<1.7E+01	<1.1E+01	<1.2E+01	<2.6E+01	<2.1E+01
11/29/11	SW-1.0	<2.8E+01	<3.5E+01	4.4E+03	<2.4E+01	<2.9E+01	<3.3E+01	<2.8E+01	<4.9E+01	2.9E+03	<3.5E+01	<2.5E+01	<2.6E+01	<5.6E+01	<4.6E+01
12/27/11	SW-1.0	<1.8E+01	<1.9E+01	2.4E+03	<1.0E+01	<1.3E+01	<1.4E+01	<1.3E+01	<2.3E+01	2.2E+03	<1.9E+01	<1.1E+01	<1.1E+01	<2.2E+01	<1.8E+01
Required LLD's		6.00E+01					6.00E+01	8.00E+01							
Reportable Levels		1.00E+02					1.00E+03	2.00E+03							



## K. Conclusions

**For the year 2011, based on the results presented in this report and from comparisons with the pre-operational and operational program results from previous years, it can be concluded that the impact of Comanche Peak on the environment is very small. The only indication directly attributable to Comanche Peak is the tritium detected in Squaw Creek reservoir.**

Gross beta trend indications concerning Squaw Creek Reservoir are consistent with previous values and do not indicate any increase due to influence from Comanche Peak. Future data will be evaluated as it is received and changes will be addressed as necessary.

The atmospheric environment was sampled for airborne particulate matter, radioiodine and direct radiation. The terrestrial environment was sampled using groundwater, surface drinking water, food products and broadleaf vegetation. The aquatic environment was sampled using surface water, fish and shoreline sediments. Iodine 131 and Cesium 137 were identified in the March and April samples following the nuclear incident at Fukushima. The activity levels were consistent with data collected at other nuclear facilities. All other analyses of provided results were below the measurement detection limits, or were indicative of expected natural terrestrial and cosmogenic levels, except for the tritium in the water samples of Squaw Creek reservoir. **The tritium in Squaw Creek reservoir is reaching equilibrium and is expected to remain well below the reportable level.**

**There were no values reported during the year 2011 that exceeded any NRC reportable limit.**

## L. Inter Laboratory Comparison and Cross Check Program

### GEL Laboratories LLC

GEL Laboratories LLC is the independent contract laboratory that processes the radiological environmental monitoring samples collected by CPNPP. The contract laboratory is required to participate in an Interlaboratory Comparison Program in accordance with the ODCM Control 3.12.3. GEL participates in multiple programs to ensure all environmental media sent to them are analyzed to the proper standards.

GEL Laboratories, LLC (GEL) is a privately owned environmental laboratory. GEL was established as an analytical testing laboratory in 1981. Now a full service lab, their analytical divisions use state of the art equipment and methods to provide a comprehensive array of organic, inorganic, and radiochemical analyses.

GEL administers the QA program in accordance with the Quality Assurance Plan, GL-QSB-001. Their Quality Systems include all quality assurance (QA) policies and quality control (QC) procedures necessary to plan, implement, and assess the work they perform. GEL's QA Program establishes a quality management system (QMS) that governs all of the activities of their organization.

#### **Summary of Data Results**

During 2011, forty-three radioisotopes associated with seven matrix types were analyzed under Ziegler Analytics. Matrix types were representative of client analyses performed during 2011. The list below contains the type of matrix evaluated by GEL.

- Air Filter
- Cartridge
- Water
- Milk
- Soil
- Liquid
- Vegetation

#### **Summary of Participation in the Eckert & Ziegler Analytics Environmental Cross-Check Program**

Eckert & Ziegler Analytics provided samples for 89 individual environmental analyses. The accuracy of each result reported to Eckert & Ziegler Analytics, Inc. is measured by the ratio of GEL's result to the known value. Of the 89 analyses, 98% (87 out of 89) of all results fell within GEL's acceptance criteria. Two analytical failures occurred with the analysis of Chromium-51 in water and Strontium-90 in milk.

#### **Corrective Action Request and Report (CARR)**

There are two categories of corrective action at GEL. One is corrective action implemented at the analytical and data review level in accordance with the analytical SOP. The other is formal corrective action documented by the Quality Systems Team in accordance with GL-QS-E-002. A formal corrective action is initiated when a nonconformance reoccurs or is so significant that permanent elimination or prevention of the problem is required. GEL includes quality requirements in most analytical standard operating procedures to ensure that data are reported only if the quality control criteria are met or the quality control measures that did not meet the acceptance criteria are documented. A formal corrective action is implemented according to GL-QS-E-002 for Conducting Corrective/Preventive Action and Identifying Opportunities for Improvement. Recording and documentation is performed following guidelines stated in GL-QS-E-012 for Client NCR Database Operation. Any employee at GEL can identify and report a



nonconformance and request that corrective action be taken. Any GEL employee can participate on a corrective action team as requested by the QS team or Group Leaders. The steps for conducting corrective action are detailed in GL-QS-E-002. In the event that correctness or validity of the laboratory's test results in doubt, the laboratory will take corrective action. If investigations show that the results have been impacted, affected clients will be informed of the issue in writing within five (5) calendar days of the discovery.

#### **Quality Assurance Program for Internal and External Audits**

During each annual reporting period, at least one internal assessment is conducted in accordance with the pre-established schedule from Standard Operating Procedure for the Conduct of Quality Audits, GL-QS-E001. The annual internal audit plan is reviewed for adequacy and includes the scheduled frequency and scope of quality control actions necessary to GEL's QA program. Internal audits are conducted at least annually in accordance with a schedule approved by the Quality Systems Director. Supplier audits are contingent upon the categorization of the supplier, and may or may not be conducted prior to the use of a supplier or subcontractor. Type I suppliers and subcontractors, regardless of how they were initially qualified, are re-evaluated at least once every three years. In addition, prospective customers audit GEL during pre-contract audits. GEL hosts several external audits each year for both our clients and other programs. These programs include environmental monitoring, waste characterization, and radiobioassay. The following list of programs may audit GEL at least annually or up to every three years depending on the program.

- NELAC, National Environmental Laboratory Accreditation Program
- DOECAP, U.S. Department of Energy Consolidated Audit Program
- DOELAP, U.S. Department of Energy Laboratory Accreditation Program
- DOE QSAS, U.S. Department of Energy, Quality Systems for Analytical Services
- ISO/IEC 17025
- A2LA, American Association for Laboratory Accreditation
- DOD ELAP, US Department of Defense Environmental Accreditation Program
- NUPIC, Nuclear Procurement Issues Committee
- South Carolina Department of Health and Environmental Control (SC DHEC)

The annual radiochemistry laboratory internal audit (11-RAD-001) was conducted in March 2011. Two (2) findings, three (3) observations, and four (4) recommendations resulted from this assessment. In April 2011, each finding was closed and appropriate laboratory staff addressed each observation and recommendation.

## **Appendix A**

### **Comanche Peak Nuclear Power Plant Land Use Census 2011**

**COPY**

**COMANCHE PEAK NUCLEAR POWER PLANT  
LAND USE CENSUS 2011**



The Land Use Census identified receptors within a five (5) mile radius of the plant in each of the sixteen (16) meteorological sectors. The Land Use Census was conducted July 11 -14, 2011 and includes the following items:

1. Evaluation of the 2011 Land Use Census
2. Nearest Resident by Sector, Distance, X/Q and D/Q
3. Nearest Garden by Sector, Distance and D/Q
4. Nearest Milk Animal by Sector, Distance and D/Q
5. Population by Sector and Distance
6. Environmental Sample Locations Table
7. Environmental Monitoring Locations Map – 2 Mile Radius\*
8. 5 Mile Sector and Road Map with Field Data\*
9. Environmental Monitoring Locations Map – all sample locations

\*These maps are vaulted along with this census. Copies of this census will not contain a copy of these maps unless specifically requested.

## Evaluation of the 2011 Land Use Census

The results of the 2011 Land Use Census were reviewed for impact on the Radiological Environmental Monitoring Program (REMP). The specific areas reviewed, that could be affected by changes found in the land use census, were the sampling requirements for milk, broadleaf vegetation and food products.

Reviewing the milk sampling requirements from the ODCM Table 3.12-1 requires that samples are to be obtained from milking animals in three locations within a 5 km distance having the highest potential dose. If none are available, samples are acceptable from milking animals in locations 5 to 8 km distance where doses are calculated to be greater than 1 mrem per year. A sample is also required at a control location. There are currently no identified milking animals (cow or goat) within the specified distances therefore, there were no milk sampled during the year 2011.

No milk samples are available, the broadleaf vegetation sampling specified in ODCM Table 3.12-1 is being performed. Broadleaf sample requirements are such that samples of broadleaf vegetation are to be collected from each of two offsite locations of the highest predicted annual average D/Q if milk sampling is not performed at all the required locations. Currently, broadleaf vegetation samples are collected at two indicator locations (N - 1.45 and SW - 1.0) and one control location (SW - 13.5). These indicator locations are near the site boundary in sectors where broadleaf vegetation is available and D/Q is high. Therefore, no change to the broadleaf sampling program is required.

Food product sample requirements of ODCM Table 3.12-1 requires that one sample of each principal class of food product be collected from any area that is irrigated with water in which liquid plant waste has been discharged. Of the gardens identified in the land use census, no gardens are located in any area that irrigates with water in which liquid plant wastes are discharged. Currently, food products are sampled from one indicator location (ENE - 9.0) when in season. The indicator location for ENE-9.0 for pecans at time of harvest will be continued since it is a major source of food products sold to the public.

The 2011 Land Use Census did not identify any locations within 5 miles with a garden of greater than 500 ft<sup>2</sup> producing broadleaf vegetation as outlined in CPNPP procedures and Comanche Peak Steam Electric Station Offsite Dose Calculation Manual. The sampling is based on identified locations that would yield a calculated dose or dose commitment 20% greater than established when initial control sampling was performed.

Calculated values for the associated X/Q and D/Q values for each controlling receptor location and pathway are included along with the receptor distances in the data tables of this land use census. The values used to determine potential dose due to radioactive effluent discharges are the highest calculated values based on annual average values. The annual average X/Q used for dose calculations is 3.30E-6, tritium X/Q is 4.36E-6, and the D/Q value is 3.34 E-8. All these values are conservative based on the 2011 Land Use Census data and therefore no changes are required in the dose calculation parameters as verified by the field data.

\* X/Q units are Sec/cubic meter

\* D/Q units are inverse square meters

Nearest Resident by Sector, Distance, X/Q and D/Q

Sector	Distance (Miles)	X/Q	D/Q
N	2.2	9.28E-07	5.32E-09
NNE	2.2	5.58E-07	2.90E-09
NE	2.2	3.92E-07	1.42E-09
ENE	2.4	2.58E-07	7.08E-10
E	2.4	3.02E-07	6.62E-10
ESE	2.0	4.7E-07	1.20E-09
SE	2.0	7.1E-07	2.80E-09
SSE	1.5	1.10E-06	6.60E-09
S	1.5	8.50E-07	5.20E-09
SSW	2.1	3.52E-07	1.56E-09
SW	0.8	3.56E-06	1.85E-08
WSW	0.8	3.92E-06	1.32E-08
W	1.6	7.64E-07	2.50E-09
WNW	2.8	4.07E-07	1.18E-09
NW	4.8	2.52E-07	1.30E-10
NNW	2.5	8.4E-07	3.6E-09

**Note:** The Annual Average X/Q used for dose calculations is 3.30E-06 sec/cubic meter.  
The Tritium value X/Q used for dose calculations is 4.36E-06 sec/cubic meter.  
The Annual Average D/Q used for dose calculations is 3.34E-08 inverse square meters.



### Nearest Garden by Sector, Distance and D/Q

Sector	Distance (Miles)*	D/Q
N	None	None
NNE	None	None
NE	None	None
ENE	None	None
E	None	None
ESE	None	None
SE	None	None
SSE	None	None
S	None	None
SSW	None	None
SW	None	None
WSW	None	None
W	None	None
WNW	None	None
NW	None	None
NNW	None	None

\*There are currently no gardens.

### Nearest Milk Animal by Sector, Distance and D/Q

Sector	Distance (Miles)*	D/Q
N	None	None
NNE	None	None
NE	None	None
ENE	None	None
E	None	None
ESE	None	None
SE	None	None
SSE	None	None
S	None	None
SSW	None	None
SW	None	None
WSW	None	None
W	None	None
WNW	None	None
NW	None	None
NNW	None	None

\*No Milk samples are currently being collected.

### Population by Sector and Distance

Sector	0-1	1-2	2-3	3-4	4-5	Total
N	-	-	6	54	75	135
NNE	-	-	6	49	31	86
NE	-	-	60	157	260	477
ENE	-	-	75	17	27	119
E	-	-	145	99	25	269
ESE	-	-	66	94	159	319
SE	-	-	137	228	99	464
SSE	-	53	88	72	1847	2060
S	-	14	118	25	231	388
SSW	-	3	3	6	58	70
SW	9	83	9	53	31	185
WSW	9	64	9	6	0	88
W	-	53	6	21	21	101
WNW	-	-	3	42	111	156
NW	-	-	-	-	3	3
NNW	-	-	6	36	29	71
<b>TOTAL</b>	<b>18</b>	<b>270</b>	<b>737</b>	<b>959</b>	<b>3007</b>	<b>4991</b>

The average number of residents per house was obtained from North Central Texas Council of Governments for Hood and Somervell Counties. The number of residents per house is 2.57 and 2.74, respectively.

Note: 2011 Land Use Census was performed with the use of maps and information provided by Somervell County/Hood County 9-1-1 addressing/ geographic information system. Change in sector population can be attributed to use of 911 (Hood and Somervell counties) dispatchers maps. The most notable Distance/Sector change was 1-2 miles in sector WSW which was estimated at 349 people in 2010 and 63 people in 2011. The original 9-1-1 map is vaulted under RPI-714-1.



Environmental Sample Locations Table

Sampling Point	Location	Sample Type*
A1	N-1.45 (Squaw Creek Park)	A
A2	N-9.4 (Granbury)	A
A3	E-3.5 (Children's Home)	A
A4	SSE-4.5 (Glen Rose)	A
A5	S/SSW-1.2	A
A6	SW-12.3 (CONTROL)	A
A7	SW/WSW-0.95	A
A8	NW-1.0	A
R1	N-1.45 (Squaw Creek Park)	R
R2	N-4.4	R
R3	N-6.5	R
R4	N-9.4 (Granbury)	R
R5	NNE-1.1	R
R6	NNE-5.65	R
R7	NE-1.7	R
R8	NE-4.8	R
R9	ENE-2.5	R
R10	ENE-5.0	R
R11	E-0.5	R
R12	E-1.9	R
R13	E-3.5 (Children's Home)	R
R14	E-4.2	R
R15	ESE-1.4	R
R16	ESE-4.7	R
R17	SE-1.3	R
R18	SE-3.85	R

Environmental Sample Locations Table (cont.)

Sampling Point	Location	Sample Type*
R19	SE-4.6	R
R20	SSE-1.3	R
R21	SSE-4.4 (Glen Rose)	R
R22	SSE-4.5 (Glen Rose)	R
R23	S-1.5	R
R24	S-4.2	R
R25	SSW-1.1	R
R26	SSW-4.4 (State Park)	R
R27	SW-0.9	R
R28	SW-4.8 (Girl Scout Camp)	R
R29	SW-12.3 (CONTROL)	R
R30	WSW-1.0	R
R31	WSW-5.35	R
R32	WSW-7.0 (CONTROL)	R
R33	W-1.0	R
R34	W-2.0	R
R35	W-5.5	R
R36	WNW-1.0	R
R37	WNW-5.0	R
R38	WNW-6.7	R
R39	NW-1.0	R
R40	NW-5.7	R
R41	NW-9.9 (Tolar)	R
R42	NNW-1.35	R
R43	NNW-4.6	R

Environmental Sample Locations Table (cont.)

Sampling Point	Location	Sample Type*
SW1	N-1.5 (Squaw Creek Reservoir Marina)	SW
SW2	N-9.9 (Lake Granbury)	SW/DW <sup>1</sup>
SW3	N-19.3 (CONTROL-Brazos River)	SW
SW4	NE-7.4 (Lake Granbury)	SW
SW5	ESE-1.4 (Squaw Creek Reservoir)	SW <sup>2</sup>
SW6	NNW-0.1 (Squaw Creek Reservoir)	SW/DW <sup>3</sup>
GW1	W-1.2 (NOSF Potable Water)	GW
GW2	WSW-0.1 (Plant Potable Water)	GW <sup>3,4</sup>
GW3	SSE-4.6 (Glen Rose)	GW <sup>4</sup>
GW4	N-9.8 (Granbury)	GW <sup>1,4</sup>
GW5	N-1.45 (Squaw Creek Park)	GW <sup>4</sup>
SS1	NNE-1.0 (Squaw Creek Reservoir)	SS
SS2	N-9.9 (Lake Granbury)	SS
SS3	NE-7.4 (Lake Granbury)	SS
SS4	SE-5.3 (Squaw Creek)	SS
F1	ENE-2.0 (Squaw Creek Reservoir)	F
F2	NNE-8.0 (Lake Granbury)	F
FP1	ENE-9.0 (Leonard Bros. Pecan Farm)	FP

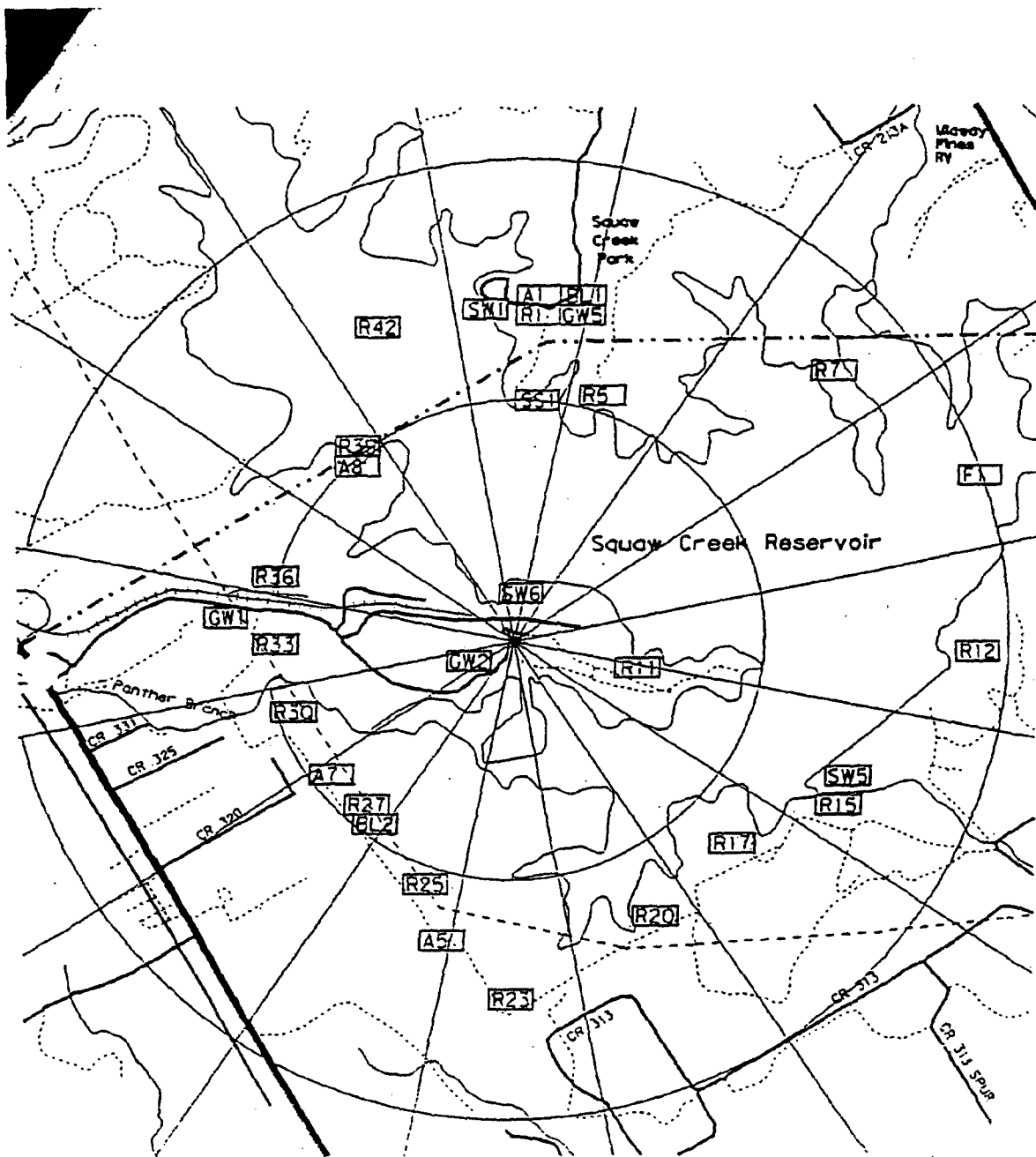


### Environmental Sample Locations Table (cont.)

Sampling Point	Location	Sample Type*
BL1	N-1.45	BL
BL2	SW-1.0	BL <sup>5</sup>
BL3	SW-13.5 (CONTROL)	BL <sup>5</sup>

\*Sample Type: A - Air Sample; R - Direct Radiation; SW - Surface Water; DW - Drinking Water; GW - Ground Water; SS - Shoreline Sediments; M - Milk; F - Fish; FP - Food Products; BL - Broadleaf Vegetation

- NOTES:**
- 1) The municipal water system for the City of Granbury is supplied by surface water from Lake Granbury (location SW2) and ground water (location GW4). Each of these supplies is sampled. These samples are not required for compliance with Radiological Effluent Control 3/4.12.1, Table 3.12-1, because they are not affected by plant discharges.
  - 2) This sample (location SW6) is representative of discharges from Squaw Creek Reservoir both down Squaw Creek and to Lake Granbury via the return line to Lake Granbury if used.
  - 3) Plant potable water could be supplied by surface water from Squaw Creek Reservoir (location SW6) but is normally supplied by ground water from onsite wells (location GW2). Each of these possible sources of water are sampled.
  - 4) Ground water supplies in the plant site area are not affected by plant liquid effluents as discussed in CPSES FSAR Section 2.4.13 and are therefore not required to be monitored for radioactivity to meet the requirements of the Radiological Effluent Control 3/4.12.1, Table 3.12-1.
  - 5) Broadleaf sampling will be performed at the specified locations if milk samples are unavailable from any location.



Environmental Sample Locations Map - 2 Mile Radius

**THIS PAGE IS AN  
OVERSIZED DRAWING OR  
FIGURE,**

**THAT CAN BE VIEWED  
AT THE RECORD TITLED:**

**“ENVIRONMENTAL SAMPLE  
LOCATIONS MAP -  
20 MILE RADIUS”**

**WITHIN THIS PACKAGE**

**D-01**