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# Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Boiling Water Reactors

Generic Letter 89-01, Supplement No. 1

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U.S. Nuclear Regulatory Commission  
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### 3/4.11 RADIOACTIVE EFFLUENTS

#### 3/4.11.1 LIQUID EFFLUENTS

##### CONCENTRATION

##### CONTROLS

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3.11.1.1 In accordance with [plant name] TS 6.8.4.g.2) and 3), the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see Figure 5.1-3) shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to  $2 \times 10^{-4}$  microCurie/ml total activity.

APPLICABILITY: At all times.

##### ACTION:

- a. With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, immediately restore the concentration to within the above limits.
- b. The provisions of Controls 3.0.3 and 3.0.4 are not applicable.

##### SURVEILLANCE REQUIREMENTS

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4.11.1.1.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-1.

4.11.1.1.2 The results of the radioactivity analyses shall be used in accordance with the methodology and parameters in the ODCM to assure that the concentrations at the point of release are maintained within the limits of Control 3.11.1.1.

TABLE 4.11-1  
RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

LIQUID RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) <sup>(1)</sup> (μCi/ml)
1. Batch Waste Release Tanks <sup>(2)</sup>	P Each Batch	P Each Batch	Principal Gamma Emitters <sup>(3)</sup>	5x10 <sup>-7</sup>
a. _____			I-131	1x10 <sup>-6</sup>
	P One Batch/M	M	Dissolved and Entrained Gases (Gamma Emitters)	1x10 <sup>-5</sup>
b. _____				
	P Each Batch	M Composite <sup>(4)</sup>	H-3	1x10 <sup>-5</sup>
			Gross Alpha	1x10 <sup>-7</sup>
c. _____				
	P Each Batch	Q Composite <sup>(4)</sup>	Sr-89, Sr-90	5x10 <sup>-8</sup>
			Fe-55	1x10 <sup>-6</sup>
2. Continuous Releases <sup>(5)</sup>		W Composite <sup>(6)</sup>	Principal Gamma Emitters <sup>(3)</sup>	5x10 <sup>-7</sup>
a. _____			I-131	1x10 <sup>-6</sup>
	M Grab Sample	M	Dissolved and Entrained Gases (Gamma Emitters)	1x10 <sup>-5</sup>
b. _____				
	Continuous <sup>(6)</sup>	M Composite <sup>(6)</sup>	H-3	1x10 <sup>-5</sup>
			Gross Alpha	1x10 <sup>-7</sup>
c. _____				
	Continuous <sup>(6)</sup>	Q Composite <sup>(6)</sup>	Sr-89, Sr-90	5x10 <sup>-8</sup>
			Fe-55	1x10 <sup>-6</sup>

## TABLE NOTATIONS

- (1) The LLD is defined, for purposes of these controls, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation:

$$LLD = \frac{4.66 s_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD = the "a priori" lower limit of detection (microCurie per unit mass or volume),

$s_b$  = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (counts per minute),

E = the counting efficiency (counts per disintegration),

V = the sample size (units of mass or volume),

$2.22 \times 10^6$  = the number of disintegrations per minute per microCurie,

Y = the fractional radiochemical yield, when applicable,

$\lambda$  = the radioactive decay constant for the particular radionuclide ( $\text{sec}^{-1}$ ), and

$\Delta t$  = the elapsed time between the midpoint of sample collection and the time of counting (sec).

Typical values of E, V, Y, and  $\Delta t$  should be used in the calculation.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

- (2) A batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated, and then thoroughly mixed by a method described in the ODCM to assure representative sampling.

TABLE 4.11-1 (Continued)

TABLE NOTATIONS (Continued)

- (3) The principal gamma emitters for which the LLD control applies include the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, and Ce-141. Ce-144 shall also be measured, but with an LLD of  $5 \times 10^{-6}$ . This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semiannual Radioactive Effluent Release Report pursuant to Control 6.9.1.4 in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.
- (4) A composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released.
- (5) A continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.
- (6) To be representative of the quantities and concentrations of radioactive materials in liquid effluents, samples shall be collected continuously in proportion to the rate of flow of the effluent stream. Prior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.

## RADIOACTIVE EFFLUENTS

### 3/4.11.2 GASEOUS EFFLUENTS

#### DOSE RATE

#### CONTROLS

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3.11.2.1 In accordance with [plant name] TS 6.8.4.g.3) and 7), the dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1-3) shall be limited to the following:

- a. For noble gases: Less than or equal to 500 mrem/yr to the whole body and less than or equal to 3000 mrem/yr to the skin, and
- b. For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to 1500 mrem/yr to any organ.

APPLICABILITY: At all times.

#### ACTION:

- a. With the dose rate(s) exceeding the above limits, immediately restore the release rate to within the above limit(s).
- b. The provisions of Controls 3.0.3 and 3.0.4 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.11.2.1.1 The dose rate due to noble gases in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM.

4.11.2.1.2 The dose rate due to Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 4.11-2.

**TABLE 4.11-2**  
**RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM**

GASEOUS RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) (1) ( $\mu\text{Ci/ml}$ )
1. Offgas Treatment System	M	M	Principal Gamma Emitters (2)	$1 \times 10^{-4}$
2. Containment PURGE OR VENT	Grab Sample P Each PURGE (3) Grab Sample	P Each PURGE (3)	Principal Gamma Emitters (2)	$1 \times 10^{-4}$
3. a. (List other release points where gaseous effluents are released from the facility)	M (3), (5) Grab Sample	M M (3)	H-3 (oxide) Principal Gamma Emitters (2)	$1 \times 10^{-6}$ $1 \times 10^{-4}$
4. All Release Types as listed in 1., 2., and 3. above	Continuous (6)	W (7) Charcoal Sample	H-3 (oxide) I-131	$1 \times 10^{-6}$ $1 \times 10^{-12}$
	Continuous (6)	W (7) Particulate Sample	Principal Gamma Emitters (2)	$1 \times 10^{-11}$
	Continuous (6)	M Composite Particulate Sample	Gross Alpha	$1 \times 10^{-11}$
	Continuous (6)	Q Composite Particulate Sample	Sr-89, Sr-90	$1 \times 10^{-11}$
	Continuous (6)	Noble Gas Monitor	Noble Gases Gross Beta or Gamma	$1 \times 10^{-6}$

TABLE 4.11-2 (Continued)

TABLE NOTATIONS

- (1) The LLD is defined, for purposes of these controls, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation:

$$LLD = \frac{4.66 s_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD = the "a priori" lower limit of detection (microCurie per unit mass or volume),

$s_b$  = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (counts per minute),

E = the counting efficiency (counts per disintegration),

V = the sample size (units of mass or volume),

$2.22 \times 10^6$  = the number of disintegrations per minute per microCurie,

Y = the fractional radiochemical yield, when applicable,

$\lambda$  = the radioactive decay constant for the particular radionuclide ( $\text{sec}^{-1}$ ), and

$\Delta t$  = the elapsed time between the midpoint of sample collection and the time of counting (sec).

Typical values of E, V, Y, and  $\Delta t$  should be used in the calculation.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.



TABLE 4.11-2 (Continued)

TABLE NOTATIONS (Continued)

- (2) The principal gamma emitters for which the LLD control applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 in noble gas releases and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141 and Ce-144 in Iodine and particulate releases. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semiannual Radioactive Effluent Release Report pursuant to Control 6.9.1.4 in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.
- (3) Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period.
- (4) Not applicable.
- (5) Tritium grab samples shall be taken at least once per 7 days from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.
- (6) The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Controls 3.11.2.1, 3.11.2.2, and 3.11.2.3.
- (7) Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing, or after removal from sampler. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup, or THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does not apply if: (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the reactor coolant has not increased more than a factor of 3; and (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.

### 3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

#### 3/4.12.1 MONITORING PROGRAM

##### CONTROLS

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3.12.1 In accordance with [plant name] TS 6.8.4.h.1), the Radiological Environmental Monitoring Program shall be conducted as specified in - Table 3.12-1.

APPLICABILITY: At all times.

##### ACTION:

- a. With the Radiological Environmental Monitoring Program not being conducted as specified in Table 3.12-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Control 6.9.1.3, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.
- b. With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 3.12-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, pursuant to Control 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose\* to a MEMBER OF THE PUBLIC is less than the calendar year limits of Controls 3.11.1.2, 3.11.2.2, or 3.11.2.3. When more than one of the radionuclides in Table 3.12-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \dots \geq 1.0$$

When radionuclides other than those in Table 3.12-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose\* to a MEMBER OF THE PUBLIC from all radionuclides is equal to or greater than the calendar year limits of Control 3.11.1.2, 3.11.2.2, or 3.11.2.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report required by Control 6.9.1.3.

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\*The methodology and parameters used to estimate the potential annual dose to a MEMBER OF THE PUBLIC shall be indicated in this report.

## RADIOLOGICAL ENVIRONMENTAL MONITORING

### CONTROLS

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#### ACTION (Continued)

- c. With milk or fresh leafy vegetation samples unavailable from one or more of the sample locations required by Table 3.12-1, identify specific locations for obtaining replacement samples and add them within 30 days to the Radiological Environmental Monitoring Program given in the ODCM. The specific locations from which samples were unavailable may then be deleted from the monitoring program. Pursuant to Control 6.14, submit in the next Semiannual Radioactive Effluent Release Report documentation for a change in the ODCM including a revised figure(s) and table for the ODCM reflecting the new location(s) with supporting information identifying the cause of the unavailability of samples and justifying the selection of the new location(s) for obtaining samples.
- d. The provisions of Controls 3.0.3 and 3.0.4 are not applicable.

### SURVEILLANCE REQUIREMENTS

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4.12.1 The radiological environmental monitoring samples shall be collected pursuant to Table 3.12-1 from the specific locations given in the table and figure(s) in the ODCM, and shall be analyzed pursuant to the requirements of Table 3.12-1 and the detection capabilities required by Table 4.12-1.

TABLE 3.12-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM\*

<u>EXPOSURE PATHWAY AND/OR SAMPLE</u>	<u>NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS</u> (1)	<u>SAMPLING AND COLLECTION FREQUENCY</u>	<u>TYPE AND FREQUENCY OF ANALYSIS</u>
1. Direct Radiation (2)	<p>Forty routine monitoring stations (DR1-DR40) either with two or more dosimeters or with one instrument for measuring and recording dose rate continuously, placed as follows:</p> <p>An inner ring of stations, one in each meteorological sector in the general area of the SITE BOUNDARY (DR1-DR16);</p> <p>An outer ring of stations, one in each meteorological sector in the 6- to 8-km range from the site (DR17-DR32); and</p> <p>The balance of the stations (DR33-DR40) to be placed in special interest areas such as population centers, nearby residences, schools, and in one or two areas to serve as control stations.</p>	Quarterly.	Gamma dose quarterly.

\*The number, media, frequency, and location of samples may vary from site to site. This table presents an acceptable minimum program for a site at which each entry is applicable. Local site characteristics must be examined to determine if pathways not covered by this table may significantly contribute to an individual's dose and should be included in the sample program. The code letters in parentheses, e.g., DR1, A1, provide one way of defining sample locations in this control that can be used to identify the specific locations in the map(s) and table in the ODCM.

TABLE 3.12-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>EXPOSURE PATHWAY AND/OR SAMPLE</u>	<u>NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS<sup>(1)</sup></u>	<u>SAMPLING AND COLLECTION FREQUENCY</u>	<u>TYPE AND FREQUENCY OF ANALYSIS</u>
2. Airborne			
Radioiodine and Particulates	<p>Samples from five locations (A1-A5):</p> <p>Three samples (A1-A3) from close to the three SITE BOUNDARY locations, in different sectors, of the highest calculated annual average ground-level D/Q;</p> <p>One sample (A4) from the vicinity of a community having the highest calculated annual average ground-level D/Q; and</p> <p>One sample (A5) from a control location, as for example 15 to 30 km distant and in the least prevalent wind direction.</p>	Continuous sampler operation with sample collection weekly, or more frequently if required by dust loading.	<p>Radioiodine Cannister: I-131 analysis weekly.</p> <p>Particulate Sampler: Gross beta radioactivity analysis following filter change; <sup>(3)</sup> and <sup>(4)</sup> gamma isotopic analysis of composite (by location) quarterly.</p>
3. Waterborne			
a. Surface <sup>(5)</sup>	<p>One sample upstream (Wa1).</p> <p>One sample downstream (Wa2).</p>	Composite sample over 1-month period. <sup>(6)</sup>	Gamma isotopic analysis <sup>(4)</sup> monthly. Composite for tritium analysis quarterly.
b. Ground	Samples from one or two sources (Wb1, Wb2), only if likely to be affected <sup>(7)</sup> .	Quarterly.	Gamma isotopic <sup>(4)</sup> and tritium analysis quarterly

TABLE 3.12-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<u>EXPOSURE PATHWAY AND/OR SAMPLE</u>	<u>NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS<sup>(1)</sup></u>	<u>SAMPLING AND COLLECTION FREQUENCY</u>	<u>TYPE AND FREQUENCY OF ANALYSIS</u>
3. Waterborne (Continued)			
c. Drinking	<p>One sample of each of one to three (Wc1 - Wc3) of the nearest water supplies that could be affected by its discharge.</p> <p>One sample from a control location (Wc4).</p>	Composite sample over 2-week period <sup>(6)</sup> when I-131 analysis is performed; monthly composite otherwise.	I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year <sup>(8)</sup> . Composite for gross beta and gamma isotopic analyses <sup>(4)</sup> monthly. Composite for tritium analysis quarterly.
d. Sediment from Shoreline	One sample from downstream area with existing or potential recreational value (Wd1).	Semiannually.	Gamma isotopic analysis <sup>(4)</sup> semiannually.
4. Ingestion			
a. Milk	Samples from milking animals in three locations (Ia1 - Ia3) within 5 km distance having the highest dose potential. If there are none, then one sample from milking animals in each of three areas (Ia1 - Ia3) between 5 to 8 km distant where doses are calculated to be greater than 1 mrem per yr. <sup>(8)</sup> One sample from milking animals at a control location (Ia4), 15 to 30 km distant and in the least prevalent wind direction.	Semi-monthly when animals are on pasture; monthly at other times.	Gamma isotopic <sup>(4)</sup> and I-131 analysis semi-monthly when animals are on pasture; monthly at other times.

TABLE 3.12-1 (Continued)  
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS(1)	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
4. Ingestion (Continued)			
b. Fish and Invertebrates	<p>One sample of each commercially and recreationally important species in vicinity of plant discharge area. (Ib1 - Ib__).</p> <p>One sample of same species in areas not influenced by plant discharge (Ib10 - Ib__).</p>	Sample in season, or semiannually if they are not seasonal.	Gamma isotopic analysis(4) on edible portions.
c. Food Products	<p>One sample of each principal class of food products from any area that is irrigated by water in which liquid plant wastes have been discharged (Ic1 - Ic__).</p> <p>Samples of three different kinds of broad leaf vegetation grown nearest each of two different offsite locations of highest predicted annual average ground level D/Q if milk sampling is not performed (Ic10 - Ic13).</p> <p>One sample of each of the similar broad leaf vegetation grown 15 to 30 km distant in the least prevalent wind direction if milk sampling is not performed (Ic20 - Ic23).</p>	<p>At time of harvest(9).</p> <p>Monthly during growing season.</p> <p>Monthly during growing season.</p>	<p>Gamma isotopic analyses(4) on edible portion.</p> <p>Gamma isotopic(4) and I-131 analysis.</p> <p>Gamma isotopic(4) and I-131 analysis.</p>



TABLE 3.12-1 (Continued)

TABLE NOTATIONS

- (1) Specific parameters of distance and direction sector from the centerline of one reactor, and additional description where pertinent, shall be provided for each and every sample location in Table 3.12-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978, and to Radiological Assessment Branch Technical Position, Revision 1, November 1979. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to circumstances such as hazardous conditions, seasonal unavailability, and malfunction of automatic sampling equipment. If specimens are unobtainable due to sampling equipment malfunction, effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Control 6.9.1.3. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the Radiological Environmental Monitoring Program given in the ODCM. Pursuant to Control 6.14, submit in the next Semiannual Radioactive Effluent Release Report documentation for a change in the ODCM including a revised figure(s) and table for the ODCM reflecting the new location(s) with supporting information identifying the cause of the unavailability of samples for the pathway and justifying the selection of the new location(s) for obtaining samples.
- (2) One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. (The 40 stations is not an absolute number. The number of direct radiation monitoring stations may be reduced according to geographical limitations; e.g., at an ocean site, some sectors will be over water so that the number of dosimeters may be reduced accordingly. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used and should be selected to obtain optimum dose information with minimal fading.)
- (3) Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than 10 times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.



TABLE 3.12-1 (Continued)

TABLE NOTATIONS (Continued)

- (4) Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.
- (5) The "upstream sample" shall be taken at a distance beyond significant influence of the discharge. The "downstream" sample shall be taken in an area beyond but near the mixing zone. "Upstream" samples in an estuary must be taken far enough upstream to be beyond the plant influence. Salt water shall be sampled only when the receiving water is utilized for recreational activities.
- (6) A composite sample is one in which the quantity (aliquot) of liquid sampled is proportional to the quantity of flowing liquid and in which the method of sampling employed results in a specimen that is representative of the liquid flow. In this program composite sample aliquots shall be collected at time intervals that are very short (e.g., hourly) relative to the compositing period (e.g., monthly) in order to assure obtaining a representative sample.
- (7) Groundwater samples shall be taken when this source is tapped for drinking or irrigation purposes in areas where the hydraulic gradient or recharge properties are suitable for contamination.
- (8) The dose shall be calculated for the maximum organ and age group, using the methodology and parameters in the ODCM.
- (9) If harvest occurs more than once a year, sampling shall be performed during each discrete harvest. If harvest occurs continuously, sampling shall be monthly. Attention shall be paid to including samples of tuberous and root food products.

TABLE 4.12-1 (Continued)

TABLE NOTATIONS (Continued)

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement. Analyses shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally background fluctuations, unavoidable small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors shall be identified and described in the Annual Radiological Environmental Operating Report pursuant to Control 6.9.1.3.

## RADIOLOGICAL ENVIRONMENTAL MONITORING

### 3/4.12.2 LAND USE CENSUS

#### CONTROLS

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3.12.2 In accordance with [plant name] TS 6.8.4.h.2), a Land Use Census shall be conducted and shall identify within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, the nearest residence, and the nearest garden\* of greater than 50 m<sup>2</sup> (500 ft<sup>2</sup>) producing broad leaf vegetation. [For elevated releases as defined in Regulatory Guide 1.111, Revision 1, July 1977, the Land Use Census shall also identify within a distance of 5 km (3 miles) the locations in each of the 16 meteorological sectors of all milk animals and all gardens of greater than 50 m<sup>2</sup> producing broad leaf vegetation.]

APPLICABILITY: At all times.

#### ACTION:

- a. With a Land Use Census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Control 4.11.2.3, pursuant to Control 6.9.1.4, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report.
- b. With a Land Use Census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) 20% greater than at a location from which samples are currently being obtained in accordance with Control 3.12.1, add the new location(s) within 30 days to the Radiological Environmental Monitoring Program given in the ODCM. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after [October 31] of the year in which this Land Use Census was conducted. Pursuant to Control 6.14, submit in the next Semiannual Radioactive Effluent Release Report documentation for a change in the ODCM including a revised figure(s) and table(s) for the ODCM reflecting the new location(s) with information supporting the change in sampling locations.
- c. The provisions of Controls 3.0.3 and 3.0.4 are not applicable.

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\*Broad leaf vegetation sampling of at least three different kinds of vegetation may be performed at the SITE BOUNDARY in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Controls for broad leaf vegetation sampling in Table 3.12-1, Part 4.c., shall be followed, including analysis of control samples.

## RADIOLOGICAL ENVIRONMENTAL MONITORING

### SURVEILLANCE REQUIREMENTS

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4.12.2 The Land Use Census shall be conducted during the growing season at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities. The results of the Land Use Census shall be included in the Annual Radiological Environmental Operating Report pursuant to Control 6.9.1.3.

### 3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

#### BASES

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#### 3/4.12.1 MONITORING PROGRAM

The Radiological Environmental Monitoring Program required by this control provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposure of MEMBERS OF THE PUBLIC resulting from the plant operation. This monitoring program implements Section IV.B.2 of Appendix I to 10 CFR Part 50 and thereby supplements the Radiological Effluent Monitoring Program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. Guidance for this monitoring program is provided by the Radiological Assessment Branch Technical Position on Environmental Monitoring, Revision 1, November 1979. The initially specified monitoring program will be effective for at least the first 3 years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 4.12-1 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

Detailed discussion of the LLD, and other detection limits, can be found in Currie, L. A., "Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements," NUREG/CR-4007 (September 1984), and in the HASL Procedures Manual, HASL-300.

#### 3/4.12.2 LAND USE CENSUS

This control is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the Radiological Environmental Monitoring Program given in the ODCM are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey or from consulting with local agricultural authorities shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 m<sup>2</sup> provides assurance that significant exposure pathways via leafy vegetables will be identified and monitored since a garden of this size is the minimum required to produce the quantity (26 kg/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: (1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and (2) a vegetation yield of 2 kg/m<sup>2</sup>.

## AN ACCEPTABLE RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

### Program Requirements

Environmental samples shall be collected and analyzed according to Table 1 at locations shown in Figure 1.<sup>1</sup> Analytical techniques used shall be such that the detection capabilities in Table 2 are achieved.

The results of the radiological environmental monitoring are intended to supplement the results of the radiological effluent monitoring by verifying that the 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. Thus, the specified environmental monitoring program provides measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures of individuals resulting from the station operation. The initial radiological environmental monitoring program should be conducted for the first three years of commercial operation (or other period corresponding to a maximum burnup in the initial core cycle). Following this period, program changes may be proposed based on operational experience.

The specified detection capabilities are state-of-the-art for routine environmental measurements in industrial laboratories.

Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the annual report.

The laboratories of the licensee and licensee's contractors which perform analyses shall participate in the Environmental Protection Agency's (EPA's) Environmental Radioactivity Laboratory Intercomparisons Studies (Crosscheck) Program or equivalent program. This participation shall include all of the determinations (sample medium-radionuclide combination) that are offered by EPA and that also are included in the monitoring program. The results of analysis of these crosscheck samples shall be included in the annual report. The participants in the EPA crosscheck program may provide their EPA program code so that the NRC can review the EPA's participant data directly in lieu of submission in the annual report.

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<sup>1</sup> It may be necessary to require special studies on a case-by-case and site specific basis to establish the relationship between quantities of radioactive material released in effluents, the concentrations in environmental media, and the resultant doses for important pathways.



If the results of a determination in the EPA crosscheck program (or equivalent program) are outside the specified control limits, the laboratory shall investigate the cause of the problem and take steps to correct it. The results of this investigation and corrective action shall be included in the annual report.

The requirement for the participation in the EPA crosscheck program, or similar program, is based on the need for independent checks on the precision and accuracy of the measurements of radioactive material in environmental sample matrices as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are reasonably valid.

A census shall be conducted annually during the growing season to determine the location of the nearest milk animal and nearest garden greater than 50 square meters (500 sq. ft.) producing broad leaf vegetation in each of the 16 meteorological sectors within a distance of 8 km (5 miles).<sup>2</sup> For elevated releases as defined in Regulatory Guide 1.111, Rev. 1., the census shall also identify the locations of all milk animals, and gardens greater than 50 square meters producing broad leaf vegetation out to a distance of 5 km. (3 miles) for each radial sector.

If it is learned from this census that the milk animals or gardens are present at a location which yields a calculated thyroid dose greater than those previously sampled, or if the census results in changes in the location used in the radioactive effluent technical specifications for dose calculations, a written report shall be submitted to the Director of Operating Reactors, NRR (with a copy to the Director of the NRC Regional Office) within 30 days identifying the new location (distance and direction). Milk animal or garden locations resulting in higher calculated doses shall be added to the surveillance program as soon as practicable.

The sampling location (excluding the control sample location) having the lowest calculated dose may then be dropped from the surveillance program at the end of the grazing or growing season during which the census was conducted. Any location from which milk can no longer be obtained may be dropped from the surveillance program after notifying the NRC in writing that they are no longer obtainable at that location. The results of the land-use census shall be reported in the annual report.

The census of milk animals and gardens producing broad leaf vegetation is based on the requirement in Appendix I of 10 CFR Part 50 to "Identify changes in the use of unrestricted areas (e.g., for agricultural purposes) to permit modifications in monitoring programs for evaluating doses to individuals from principal pathways of exposure." The consumption of milk from animals grazing on contaminated pasture and of leafy vegetation contaminated by airborne

<sup>2</sup> Broad leaf vegetation sampling may be performed at the site boundary in a sector with the highest D/Q in lieu of the garden census.

radioiodine is a major potential source of exposure. Samples from milk animals are considered a better indicator of radioiodine in the environment than vegetation. If the census reveals milk animals are not present or are unavailable for sampling, then vegetation must be sampled.

The 50 square meter garden, considering 20% used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and a vegetation yield of 2 kg/m<sup>2</sup>, will produce the 26 kg/yr assumed in Regulatory Guide 1.109, Rev 1., for child consumption of leafy vegetation. The option to consider the garden to be broad leaf vegetation at the site boundary in a sector with the highest D/Q should be conservative and that location may be used to calculate doses due to radioactive effluent releases in place of the actual locations which would be determined by the census. This option does not apply to plants with elevated releases as defined in Regulatory Guide 1.111, Rev. 1.

The increase in the number of direct radiation stations is to better characterize the individual exposure (mrem) and population exposure (man-rem) in accordance with Criterion 64 - Monitoring radioactivity releases, of 10 CFR Part 50, Appendix A. The NRC will place a similar amount of stations in the area between the two rings designated in Table 1.

#### NOTE

Guidance on the subjects contained on pages 4 through 16 of the Radiological Assessment Branch Technical Position (RAB-BTP) has been modified and upgraded based on operating experience since Revision 1 was published in 1979. The current staff guidance for the following items has been incorporated in the Section 3/4-12 and Section 6 Controls of NUREG-1301 and 1302.

- Reporting Requirement
- Table 1: Operational Radiological Environmental Monitoring Report
- Table 2: Detection Capabilities for Environmental Sample Analysis
- Table 4: Reporting Levels for Radioactivity Concentrations in Environmental Samples

The following items remain unchanged:

- Footnote to Table 1 on page 10
- Table 3 of page 14
- Figure 1 of page 16



Pages 5, 6, 7, 8, 9, 11, 12, 13, 15

The above pages have been superceded by text and tables  
in NUREG-1301 and 1302.

TABLE 1 (Continued)

**Note:** In addition to the above guidance for operational monitoring, the following material is supplied for guidance on preoperational programs.

**Preoperational Environmental Surveillance Program**

A Preoperational Environmental Surveillance Program should be instituted two years prior to the institution of station plant operation.

The purposes of this program are:

1. To measure background levels and their variations along the anticipated critical pathways in the area surrounding the station.
2. To train personnel
3. To evaluate procedures, equipment and techniques

The elements (sampling media and type of analysis) of both preoperational and operational programs should be essentially the same. The duration of the preoperational program, for specific media, presented in the following table should be followed:

**Duration of Preoperational Sampling Program for Specific Media**

<u>6 months</u>	<u>1 year</u>	<u>2 years</u>
<ul style="list-style-type: none"> <li>. airborne iodine</li> <li>. iodine in milk (while animals are in pasture)</li> </ul>	<ul style="list-style-type: none"> <li>. airborne particulates</li> <li>. milk (remaining analyses)</li> <li>. surface water</li> <li>. groundwater</li> <li>. drinking water</li> </ul>	<ul style="list-style-type: none"> <li>. direct radiation</li> <li>. fish and invertebrates</li> <li>. food products</li> <li>. sediment from shoreline</li> </ul>