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PNP 2016-029

10 CFR 72.44

April 25, 2016

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

Subject: 2015 Radiological Environmental Operating Report

Big Rock Point Plant  
Dockets 50-155 and 72-043  
License No. DPR-6

Dear Sir or Madam:

Entergy Nuclear Operations, Inc. is submitting the enclosed Radiological Environmental Operating Report for the Big Rock Point Independent Spent Fuel Storage Installation (ISFSI). This report was prepared in accordance with the requirements of 10 CFR 50, Appendix I, Section IV.B, and Defueled Technical Specification 6.6.2. The period covered by the enclosed report is January 1, 2015, through December 31, 2015.

This letter contains no new commitments and no revision to existing commitments.

Sincerely,

A handwritten signature in black ink, appearing to read "JAH", followed by a flourish.

JAH/bed

Enclosure: Big Rock Point 2015 Annual Radiological Environmental Operating Report  
Attachment 1: Sample Collection Anomalies  
Attachment 2: Environmental Sample Schedule and Sample Location Maps  
Attachment 3: Radiological Environmental Monitoring Program Data for BRP ISFSI

CC Administrator, Region III, USNRC  
BRP ISFSI Inspector, USNRC  
NMSS Project Manager, USNRC

NMSS26  
NMSS

## **ENCLOSURE**

### **Big Rock Point 2015 Annual Radiological Environmental Operating Report**

#### **I. Introduction**

The 2015 Big Rock Point (BRP) Annual Radiological Environmental Operating Report provides a summary and data interpretation of the BRP Radiological Environmental Monitoring Program (REMP) as conducted during the 2015 reporting period. Reporting requirements are detailed in the BRP Defueled Technical Specification 6.6.2 and Offsite Dose Calculation Manual (ODCM).

The BRP ODCM contains the requirements for the REMP. The radiological environmental monitoring sampling requirements are greatly reduced from the plant's operating period and now only encompass Independent Spent Fuel Storage Installation (ISFSI) operations.

All samples were collected during the monitoring period with no anomalies.

Tables 1, 2, and 3, of this enclosure, provide a summary of 2015 BRP REMP sample requirements and results.

#### **II. Discussion and Interpretation of Results**

##### **A. TLDs – Gamma Dose**

The BRP Gamma Dose Assessment Program consists of eleven thermoluminescent dosimeter (TLD) locations: Four at the outside perimeter of the ISFSI (locations: BR-18, BR-19, BR-20, and BR-21), four at the ISFSI protected area fence line (locations: BR-22, BR-23, BR-24, and BR-25), and three control TLDs, approximately 13 miles out (locations: BR-5 Petoskey, BR-6 Boyne City, and BR-7 Ironton). These are the only TLDs required for ISFSI operation. The additional locations are no longer applicable because they no longer exist. Environmental gamma doses are measured quarterly by placement of one TLD badge per designated location. Detailed sample station identification and location information is provided in Attachment 2.

For 2015, the average quarterly gamma readings were:

23.1 millirem for protected area fence TLDs,  
17.8 millirem for ISFSI outside perimeter TLDs, and  
18.6 millirem for the control TLD locations.

The comparative evaluation of the protected area fence line quarterly TLD mean and the ISFSI outside perimeter TLD mean measured in 2015, are slightly lower from that of 2014, but still within the statistical standard deviation.

A comparative evaluation was also completed of the 2015 offsite control TLD data to the ISFSI outside perimeter TLD data. There was excellent correlation between the off-site control TLDs and the ISFSI outside perimeter TLDs. There was no significant difference between the 2014 and 2015 control data.

Each TLD badge contains a 4-chip TLD that meets ANSI N545-1975 requirements.

B. Air Samples

The BRP REMP no longer requires that airborne surveillance be conducted.

C. Milk

The BRP REMP no longer requires that milk samples be collected.

D. Lake Water

The BRP REMP no longer requires that lake water samples be collected.

E. Drinking Water

The BRP REMP no longer requires that drinking water samples be collected.

F. Crops

The collection of food crops/vegetation is not required by the BRP REMP.

G. Sediment

The BRP REMP no longer requires that well water samples be collected.

H. Aquatic Biota

The collection of aquatic biota (algae and periphyton) is no longer required by the BRP REMP.

III. Assessment of BRP ISFSI Operational Environmental Impact

Review and comparison of the 2015 BRP radiological environmental monitoring data to previous data shows that the parameters analyzed support the conclusion that ISFSI operations have had minimal environmental impact.

**Table 1. Sampling and Analysis Summary**

| <u>Medium</u>    | <u>Description</u>         | <u>Location(s)</u>          | <u>Type of Analysis</u> | <u>Number of Samples Collected</u> | <u>Frequency of Analysis</u> |
|------------------|----------------------------|-----------------------------|-------------------------|------------------------------------|------------------------------|
| TLD              | BR-5, BR-6, BR-7, BR-18-25 | 18-25 BRP, 5-PT, 6-BC, 7-IR | Gamma Isotopic          | 44                                 | Quarterly <sup>a</sup>       |
| Lake Water       | 1 gallon composite         | 1-ST                        | Tritium, Gamma Isotopic | 0                                  | No Longer Required           |
| Well Water       | 1 gallon grab/composite    | Site Well                   | Tritium, Gamma Isotopic | 0                                  | No Longer Required           |
| Monitoring Wells | 1 gallon grab              | MW 1-9                      | Tritium, Gamma Isotopic | 0                                  | No Longer Required           |
| Sediment         | Grab                       | 1-ST, 24-STS, 25-STN, 26-LP | Gamma Isotopic          | 0                                  | No Longer Required           |
| Fish             | Grab                       | 1-ST Discharge              | Gamma Isotopic          | 0                                  | No Longer Required           |

**Table Notes**

<sup>a</sup> Only quarterly TLDs are required per Big Rock Point ODCM

**Table 2. Sample Data Summary <sup>a</sup>**

| Medium or Pathway<br>Sampled<br>(Units) | Analysis Evaluated<br>Versus Total Number<br>Analyses Performed | Lower Limit<br>of Detection<br>(LLD) <sup>b</sup> | All Indicator Locations<br>Mean <sup>c</sup><br>(Range) | All Control Locations<br>Mean <sup>c</sup><br>(Range) | Nonroutine<br>Measurements |
|---|---|---|---|---|----------------------------|
| <b><u>Direct Radiation:</u></b>         |   |   |   |   |                            |
| TLD – Protected Area<br>(mR) Fence      | TLD (quarterly) <sup>d</sup> <sup>e</sup> 16/16                 | 1.0   | 16/16<br>23.1<br>(19-33)                                | 12/12<br>18.6<br>(16-23)                              | None                       |
| TLD – ISFSI Outside<br>(mR) Perimeter   | TLD (quarterly) <sup>d</sup> <sup>e</sup> 16/16                 | 1.0   | 16/16<br>17.8<br>(15-20)                                | 12/12<br>18.6<br>(16-23)                              | None                       |
| <b><u>Waterborne:</u></b>               |   |   |   |   |                            |
| Lake Water<br>(pCi/L)                   | Sample not<br>required  |   |   |   |                            |
| Well Water<br>(pCi/L)                   | Sample not<br>required  |   |   |   |                            |
| <b><u>Lake Sediment:</u></b>            |   |   |   |   |                            |
| Sediment<br>(pCi/g dry)                 | Sample not<br>required  |   |   |   |                            |
| <b><u>Biota:</u></b>                    |   |   |   |   |                            |
| Fish<br>(pCi/g wet)                     | Sample not<br>required  |   |   |   |                            |
| Crayfish<br>(pCi/g wet)                 | Sample not<br>required  |   |   |   |                            |

**Table Notes:**<sup>a</sup> Values for sample locations with the greatest annual mean are provided in Table 3.<sup>b</sup> Nominal LLD as defined in the Big Rock Offsite Dose Calculation Manual Section I, Table I-3 and vendor analytical capabilities.<sup>c</sup> Mean and range data reported are based upon detectable measurements.<sup>d</sup> Quarterly TLD results are normalized for 91 days net.<sup>e</sup> Quarterly TLDs are read quarterly. Quarterly measurements are compared to control measurements to evaluate compliance with 10 CFR 72.104. The results for the ISFSI TLDs and the average of the control TLDs measured in 2015 are summarized in the Table.

**Table 3. Reporting Results Greatest Mean Sampling Location**

| <u>Medium</u>                      | <u>Type of Analysis</u>        | <u>Location</u> | <u>High</u> | <u>Low</u> | <u>Mean</u> |
|------------------------------------|--------------------------------|-----------------|-------------|------------|-------------|
| TLD – Protected Area Fence (mR)    | TLD (Quarterly) <sup>a b</sup> | BRP-23          | 33          | 29         | 31.25       |
| TLD – ISFSI Outside Perimeter (mR) | TLD (Quarterly) <sup>a b</sup> | BRP-20          | 20          | 18         | 19.25       |
| Lake Water (pCi/L)                 | No Longer Required             |                 |             |            |             |
| Well Water (pCi/L)                 | No Longer Required             |                 |             |            |             |
| Sediment (pCi/g dry)               | No Longer Required             |                 |             |            |             |
| Fish (pCi/g wet)                   | No Longer Required             |                 |             |            |             |
| Crayfish (pCi/g wet)               | No Longer Required             |                 |             |            |             |

**Table Notes:**

<sup>a</sup> Quarterly TLD results are normalized for 91 days net.

<sup>b</sup> Quarterly TLDs are read quarterly. Quarterly measurements are compared to control measurements to evaluate compliance with 10 CFR 72.104. The results for the ISFSI TLDs and the average of the control TLDs measured in 2015 are summarized in the Table.

**Attachment 1**  
**Sample Collection Anomalies**

LOCATION

TYPE

REASON

NONE TO REPORT

## Attachment 2 Environmental Sample Schedule and Sample Location Maps

TABLE 1-1

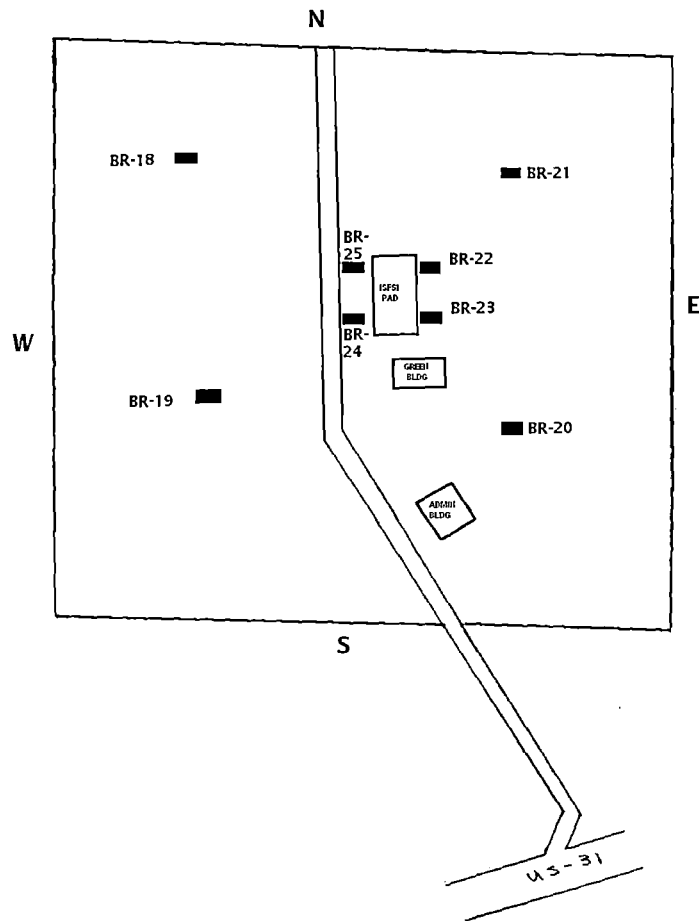
### RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

| Exposure Pathway<br>and/or Sample | Number of Representative Samples<br>and Sample Locations <sup>a</sup>  | Sampling and<br>Collection<br>Frequency | Type and<br>frequency of<br>Analysis |
|-----------------------------------|--|---|--------------------------------------|
| 1. Direct Radiation <sup>b</sup>  | 21 monitoring stations either with two or more TLDs or one instrument for measuring and recording dose rate continuously, placed as follows <sup>c</sup> :<br>a) Miscellaneous site locations (4)<br>b) A ring of stations (6) at or near the Site boundary<br>c) Balance of stations (3) placed to serve as control stations<br>d) Outside perimeter of ISFSI (4) <sup>d</sup><br>e) ISFSI protected area fence line (4) <sup>d</sup> | Quarterly                               | Gamma dose quarterly                 |

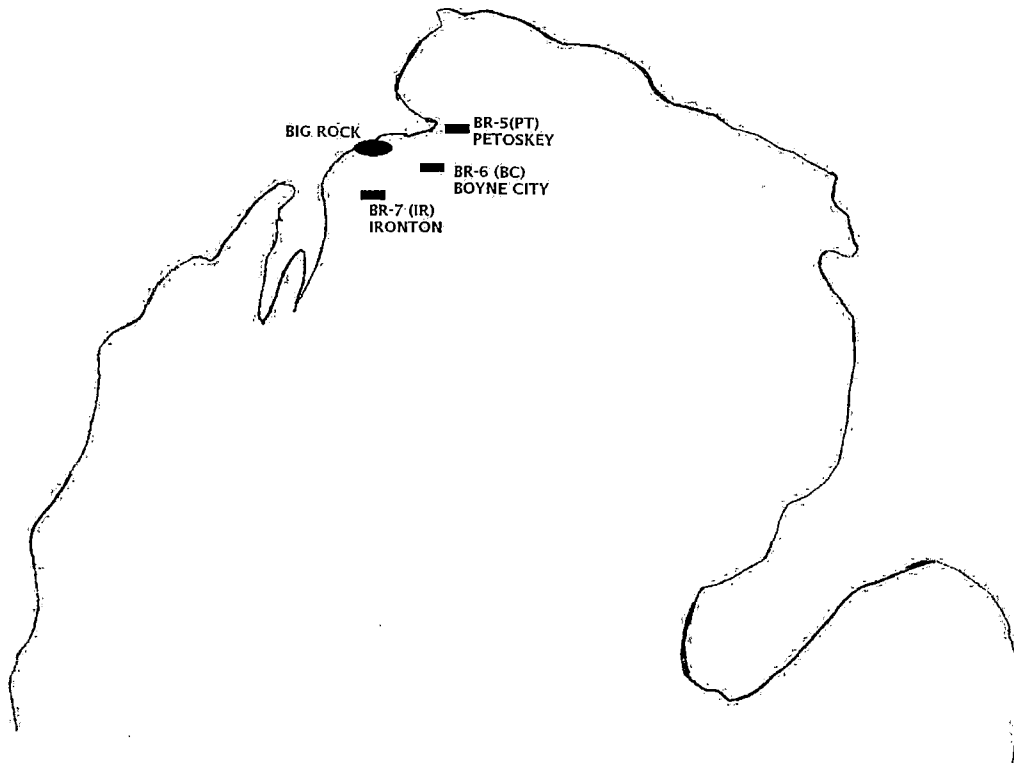
- a. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, every effort 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 Radiological Environmental Operating Report pursuant to the Reporting Requirements of ODCM. Alternative media and locations may be chosen for any particular pathway if designated locations or media are not available, and appropriate substitutions are made within 30 days in the radiological environmental monitoring program.
- b. 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. The background dosimetry requirement also may be met through use of dosimeters shared with another facility, or from data provided by another entity, such as the State of Michigan, as appropriate for this site.
- c. For the purposes of this table, a TLD is considered to be one phosphor; two or more phosphors or phosphor readout zones in a packet are considered as two or more dosimeters.
- d. TLDs designated for ISFSI only operation.



Big Rock Point  
Environmental Sample Location Map



**BIG ROCK POINT  
CONTROL TLD LOCATIONS**



## **Attachment 3**

### **Radiological Environmental Monitoring Program (REMP) Data for Big Rock Point (BRP) Independent Spent Fuel Storage Installation (ISFSI)**



**MIRION**  
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www.mirion.com

### Global Dosimetry Solutions Environmental Report

|                   |          |      |
|-------------------|----------|------|
| Account           | 89567    | RSCS |
| Location          | 00000DPT |      |
| Monitoring Period | 1/1/2015 |      |
| Process           | 0224533  |      |

| Badge Number | Name     | Exposure mR* |
|--------------|----------|--------------|
|              | CONTROL  | 14           |
| 1            | BR-5     | 16           |
| 2            | BR-6     | 19           |
| 3            | BR-7     | 19           |
| 4            | BR-18    | 15           |
| 5            | BR-19    | 17           |
| 6            | BR-20    | 18           |
| 7            | BR-22    | 20           |
| 8            | BR-23    | 32           |
| 9            | BR-24    | 22           |
| 10           | BR-25    | 19           |
| 11           | BR-SH1   | 12           |
| 12           | BR-SH2   | 13           |
| 13           | BR-CTRL1 | 12           |
| 14           | BR-CTRL2 | 12           |
| 15           | BR-21    | 17           |
| 16           | BR-SP2   | 12           |
| 17           | BR-SP1   | 11           |

\*- No control exposures have been subtracted, and only element, reader and fade corrections have been made.



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### Global Dosimetry Solutions Environmental Report

|                   |          |      |
|-------------------|----------|------|
| Account           | 89567    | RSCS |
| Location          | 00000DPT |      |
| Monitoring Period | 4/1/2015 |      |
| Process           | 0225628  |      |

| Badge Number | Name     | Exposure mR |
|--------------|----------|-------------|
|              | CONTROL  | 13          |
| 1            | BR-5     | 18          |
| 2            | BR-6     | 17          |
| 3            | BR-7     | 20          |
| 4            | BR-18    | 16          |
| 5            | BR-19    | 19          |
| 6            | BR-20    | 19          |
| 7            | BR-22    | 19          |
| 8            | BR-23    | 33          |
| 9            | BR-24    | 21          |
| 10           | BR-25    | 19          |
| 11           | BR-SH1   | 13          |
| 12           | BR-SH2   | 12          |
| 13           | BR-CTRL1 | 13          |
| 14           | BR-CTRL2 | 14          |
| 15           | BR-21    | 17          |
| 16           | BR-SP2   | 13          |
| 17           | BR-SP1   | 13          |

\* No control exposures have been subtracted, and only element, reader and fade corrections have been made.



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|                   |          |      |
|-------------------|----------|------|
| Account           | 89567    | RSCS |
| Location          | 00000DPT |      |
| Monitoring Period | 7/1/2015 |      |
| Process           | 0226910  |      |

| Badge Number | Name     | Exposure mR |
|--------------|----------|-------------|
|              | CONTROL  | 14          |
| 1            | BR-5     | 18          |
| 2            | BR-6     | 18          |
| 3            | BR-7     | 17          |
| 4            | BR-18    | 16          |
| 5            | BR-19    | 18          |
| 6            | BR-20    | 20          |
| 7            | BR-22    | 19          |
| 8            | BR-23    | 29          |
| 9            | BR-24    | 20          |
| 10           | BR-25    | 19          |
| 11           | BR-SH1   | 12          |
| 12           | BR-SH2   | 12          |
| 13           | BR-CTRL1 | 12          |
| 14           | BR-CTRL2 | 12          |
| 15           | BR-21    | 15          |
| 16           | BR-SP2   | 12          |
| 17           | BR-SP1   | 11          |

\*- No control exposures have been subtracted, and only element, reader and fade corrections have been made.



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### Global Dosimetry Solutions Environmental Report

|                   |           |      |
|-------------------|-----------|------|
| Account           | 89567     | RSCS |
| Location          | 00000DPT  |      |
| Monitoring Period | 10/1/2015 |      |
| Process           | 0228176   |      |

| Badge Number | Name     | Exposure mR |
|--------------|----------|-------------|
|              | CONTROL  | 14          |
| 1            | BR-5     | 19          |
| 2            | BR-6     | 23          |
| 3            | BR-7     | 19          |
| 4            | BR-18    | 20          |
| 5            | BR-19    | 20          |
| 6            | BR-20    | 20          |
| 7            | BR-22    | 22          |
| 8            | BR-23    | 31          |
| 9            | BR-24    | 24          |
| 10           | BR-25    | 20          |
| 11           | BR-SH1   | 14          |
| 12           | BR-SH2   | 14          |
| 13           | BR-CTRL1 | 16          |
| 14           | BR-CTRL2 | 13          |
| 15           | BR-21    | 18          |
| 16           | BR-SP2   | 14          |
| 17           | BR-SP1   | 13          |

\*: No control exposures have been subtracted, and only element, reader and fade corrections have been made.