APPENDIX E

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OFFSITE DOSE CALCULATION MANUAL
PALO VERDE NUCLEAR GENERATING STATION
UNITS 1, 2 AND 3

REVISION 12

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1.0 INTRODUCTION

The Offsite Dose Calculation Manual (ODCM) implements the program elements which are required by the Administrative Controls section of the Technical Specifications. The ODCM contains the operational requirements, the surveillance requirements, and actions required if the operational requirements are not met for the Radioactive Effluent Controls Program and the Radiological Environmental Monitoring Program to assure compliance with 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. The Technical Specifications, Section 3/4.0, also apply to the ODCM. Substitute the word "Requirements" for "Limiting Condition for Operation." It should be noted that the hot and cold shutdown and operability requirements in Technical Specification 3.0.3 and 3.0.4 do not apply to any of the requirements contained in this ODCM. The ODCM also contains descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Annual Radioactive Effluent Release Report required by the Technical Specifications.

The ODCM provides the parameters and methodology to be used in calculating offsite doses resulting from radioactive effluents, in the calculation of gaseous effluent monitor Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. Included are methods for determining air, whole body, and organ dose at the controlling location due to plant effluents to assure compliance with the regulatory requirements detailed in the ODCM. Methods are included for performing dose projections to assure compliance with the gaseous treatment system operability sections of the ODCM. The ODCM utilizes information from NRC Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," October 1977, and NRC NUREG 0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978. NUREG 0133 utilizes some of the key information in Regulatory Guide 1.109 to provide methods which were used in the preparation of the radiological effluent Technical Specifications and which have now been transferred to the ODCM in accordance with NRC Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program," January 31, 1989, and NUREG 1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors," Generic Letter 89-01, Supplement No. 1, April 1991. Further guidance for the implementation of the new 10 CFR Part 20, effective January 1, 1994, was obtained from the Federal Register, Vol. 58, December 23, 1993. It is recognized that this is only draft guidance, however, it is the only guidance for referencing the new 10 CFR 20 in the ODCM.

1.1 Liquid Effluent Pathways

Dose calculation methodology for liquid effluents is not included in this manual due to the desert location of the plant, the hydrology of the area, and the fact that there are no liquid releases to areas at or beyond the SITE BOUNDARY during normal operation. All liquid discharges to the onsite evaporation ponds are controlled by Section 3.2. The impact of postulated accidental seepages on the groundwater system, and in particular on the existing wells located in the 5-mile zone around the site area has been calculated and analyzed in Section 2.4.13.3 of the PVNGS FSAR.

If plant operating conditions become such that the likelihood of a liquid effluent pathway is created, then dose calculation methodology for this pathway will be added to this manual.

1.2 Gaseous Effluent Pathways

All gaseous effluents are treated as ground level releases and are considered to be "long-term" as discussed in NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants." This includes the containment purge and Waste Gas Decay Tank releases as well as the normal ventilation system and condenser vacuum exhaust releases. All releases are either greater than 500 hours in duration or are made at random, not depending upon atmospheric conditions or time of day. The releases are lumped together and calculated as an entity. Historical annual average X/Q values are used throughout this manual for all gaseous effluent setpoint and dose calculations. Airborne releases are further subdivided into two subclasses:

1.2.1 Iodine-131, Iodine-133, Tritium and Radionuclides in Particulate Form with Half-lives Greater than Eight Days

In this model, a controlling location is identified for assessing the maximum exposure to a MEMBER OF THE PUBLIC for the various pathways and to critical organs. Infant exposure occurs through inhalation and any actual milk pathway. Child, teenager and adult exposure derives from inhalation, consumed vegetation pathways, and any actual milk and meat pathways. Dose to each of the seven organs listed in Regulatory Guide 1.109 (bone, liver, total body, thyroid, kidney, lung and GI-LLI) are computed from individual nuclide contributions in each sector. The largest of the organ doses in any sector is compared to 10 CFR 50, Appendix I design objectives. The release rates of these nuclides will be converted to instantaneous dose rates for comparison to the limits of 10 CFR 20.

1.2.2 Noble Gases

The air dose from both the beta and gamma radiation component of the noble gases will be assessed and compared to the 10 CFR 50, Appendix I design objectives. The noble gas release rate will be converted to instantaneous dose rates for comparison to the limits of 10 CFR 20.

Section 2.0 of this manual discusses the methodology to be used in determining effluent monitor alarm/trip setpoints to assure compliance with the 10 CFR Part 20 limits as implemented in Section 3.0. Section 4.0 discusses the methods to assure releases are As Low As Reasonably Achievable (ALARA) in accordance with Appendix I to 10 CFR Part 50. Methods are described in Section 5.0 for determining the annual cumulative dose to a MEMBER OF THE PUBLIC from gaseous effluents and direct radiation to assure compliance with 40 CFR Part 190.

The requirements for the Annual Radiological Effluent Release Report and the Radiological Environmental Monitoring Program, including the Annual Land Use Census and the Interlaboratory Comparison Program, and the Annual Environmental Report are described in Sections 6.0 and 7.0 of this manual.

1.3 Nuisance Pathways

This section addresses the potential release pathways which should not contribute more than 10% of the doses evaluated in this manual. Table 1-1 lists examples of potential release pathways. The ODCM methodology for calculation of doses will be applied to an applicable release pathway if a likely potential arises for contributing more than 10% of the doses evaluated in this manual.

TABLE 1-1

NUISANCE PATHWAYS

(EXAMPLES)

Evaporation Pond

Cooling Towers

Laundry/Decon Building Exhaust

Unmonitored Secondary System Steam Vents/Reliefs

Turbine Building Ventilation Exhaust

Unmonitored Tank Atmospheric Vents

Dry Active Waste Processing and Storage (DAWPS) Building

Respirator Cleaning Facility

Secondary Side Decontamination Equipment

Low Level Radioactive Material Storage Facility

1.4 Meteorology

Historical annual average atmospheric dispersion (X/Q) and deposition(D/Q) data, based on nine years of meteorological data, and given in Table 3-2 for each of the three nuclear generating units are used to demonstrate compliance with the ODCM Requirements. These Requirements include:

Section 2.0	Gaseous Effluent Monitor Setpoints;
Section 3.0	Gaseous and Liquid Effluent - Dose Rate
Section 4.0	Gaseous and Liquid Effluent - Dose
Section 5.0	Total Dose and Dose to Public Onsite

Sections 2.0 and 3.0 specify utilizing the highest X/Q or D/Q meteorological dispersion parameter at the Site Boundary for any of the three units as applicable. Using the highest dispersion parameter for any of the units provides a conservative assumption to assure compliance with the higher 10 CFR Part 20 limits.

Section 4.0 specifies utilizing the highest X/Q at the Site Boundary for the particular unit, from Table 3-2 for noble gases. The highest X/Q and D/Q are utilized for the particular unit's releases as applicable for gases other than noble gases (iodines, particulates, and tritium) for the controlling pathway's location (site boundary using Table 3-2 or other controlling locations using Table 4-16).

Section 5.0 specifies utilizing the highest X/Q for the particular unit's releases at the controlling location from Table 4-16 for noble gases. The highest X/Q and D/Q are utilized for the particular unit's releases as applicable for gases other than noble gases at the controlling pathway's location using Table 4-16.

Section 7.0 requires that the meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses.

2.0 GASEOUS EFFLUENT MONITOR SETPOINTS

2.1 Requirements: Gaseous Monitors

The radioactive gaseous effluent monitoring instrumentation channels shown in Table 2-1 shall be OPERABLE with their alarm/trip setpoints set to ensure that the dose requirements in Section 3.0 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in Section 2.1.2.

Applicability: As shown in Table 2-1.

Action:

a. With the low range radioactive gaseous effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Requirement, immediately suspend the release of radioactive gaseous effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.

b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 2-1. Restore the inoperable instrumentation to OPERABLE status within 30 days or, if unsuccessful, explain in the next Annual Radioactive Effluent Release Report why this inoperability was not corrected within the time specified.

2.1.1 Surveillance Requirements:

a. Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 2-2.

TABLE 2-1

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
1. GASEOUS RADWASTE SYSTEM			
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release #RU-12	1	#	35
b. Flow Rate Monitor	1	#	36
2. NOT USED			
3. DELETED			
4. PLANT VENT SYSTEM			
A. Low Range Monitors			
a. Noble Gas Activity Monitor #RU-143	1	*	37
b. Iodine Sampler	1	*	40
c. Particulate Sampler	1	*	40
d. Flow Rate Monitor	1	*	36
e. Sampler Flow Rate Measuring Device	1	*	36
B. High Range Monitors			
a. Noble Gas Activity Monitor #RU-144	1	*	42
b. Iodine Sampler	1	*	42
c. Particulate Sampler	1	*	42
d. Sampler Flow Rate Measuring Device	1	*	42

TABLE 2-1 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
5. FUEL BUILDING VENTILATION SYSTEM			
A. Low Range Monitors			
a. Noble Gas Activity Monitor #RU-145	1	##	37, 41
b. Iodine Sampler	1	##	40
c. Particulate Sample	1	##	40
d. Flow Rate Monitor	1	##	36
e. Sampler Flow Rate Measuring Device	1	##	36
B. High Range Monitors			
a. Noble Gas Activity Monitor #RU-146	1	##	42
b. Iodine Sampler	1	##	42
c. Particulate Sample	1	##	42
d. Sampler Flow Rate Measuring Device	1	##	42

Table 2-1 (Continued)

TABLE NOTATION

* At all times.
** During GASEOUS RADWASTE SYSTEM operation
*** Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s).
# During waste gas release.
In MODES 1, 2, 3, and 4 or when irradiated fuel is in the fuel storage pool.

ACTION 35 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank(s) may be released to the environment provided that prior to initiating the release:

a. At least two independent samples of the tanks contents are analyzed, and

b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup;

Otherwise, suspend release of radioactive effluents via this pathway.

ACTION 36 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours.

ACTION 37 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the actions of (a) or (b) or (c) are performed:

a. Initiate the Preplanned Alternate Sampling Program to monitor the appropriate parameter(s).

b. Place moveable air monitors in-line.

c. Either take grab samples at least once per 12 hours, OR obtain gas channel monitor readings locally at least once per 12 hours if the channel is functional locally but inoperable due to loss of communication with the minicomputer. The surveillance requirements of Section 2.1.1 must be performed at the required frequencies for the channel to be functional locally.

ACTION 38 - NOT USED

ACTION 39 - NOT USED

ACTION 40 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the effected pathway may continue provided samples are continuously collected with auxiliary sampling equipment as required in Table 3-1 within one hour after the channel has been declared inoperable.

ACTION 41 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirements, comply with the ACTIONS of Technical Specification 3.9.12 or operate the fuel building essential ventilation system while moving irradiated fuel.

Table 2-1 (Continued)

TABLE NOTATION

ACTION 42 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement restore the channel to OPERABLE status within 72 hours or:

a. Initiate the Preplanned Alternate Sampling Program to monitor the appropriate parameter(s) when it is needed.

b. Prepare and submit a Special Report to the Commission within 30 days following the event outlining the action(s) taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

TABLE 2-2

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODE IN WHICH SURVEILLANCE IS REQUIRED
1. GASEOUS RADWASTE SYSTEM					
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release RU-12	P	P(7)	R(3)	Q(1),(2),P###	#
b. Flow Rate Monitor	P	N.A.	R	Q,P###	#
2. DELETED					
3. DELETED					
4. PLANT VENT SYSTEM (RU-143 and RU-144)					
a. Noble Gas Activity Monitor	D(5)	M(7)	R(3)	Q(2)	*
b. Iodine Sampler	N.A.	N.A.	N.A.	N.A.	*
c. Particulate Sampler	N.A.	N.A.	N.A.	N.A.	*
d. Flow Rate Monitor	D(6)	N.A.	R	Q	*
e. Sampler Flow Rate Measuring Device	D(6)	N.A.	R	Q	*
5. FUEL BUILDING VENTILATION SYSTEM (RU-145 and RU-146)					
a. Noble Gas Activity Monitor	D(5)	M(7)	R(3)	Q(2)	##
b. Iodine Sampler	N.A.	N.A.	N.A.	N.A.	##
c. Particulate Sample	N.A.	N.A.	N.A.	N.A.	##
d. Flow Rate Monitor	D(6)	N.A.	R	Q	##
e. Sampler Flow Rate Measuring Device	D(6)	N.A.	R	Q	##

Table 2-2 (Continued)

TABLE NOTATION

* At all times.
** During GASEOUS RADWASTE SYSTEM operation
*** Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s).
# During waste gas release.
In MODES 1, 2, 3, and 4 or when irradiated fuel is in the fuel storage pool.
Functional test should consist of, but not be limited to, a verification of system isolation capability by the insertion of a simulated alarm condition.

(1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway occurs if the instrument indicates measured levels above the alarm/trip setpoint.

(2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm setpoint.
2. Circuit failure.
3. Instrument indicates a downscale failure.
4. Instrument controls not set in operate mode.

(3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Institute of Standards and Technology(NIST) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NIST. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration may be used in lieu of the reference standards associated with the initial calibration.

(4) NOT USED

(5) The channel check for channels in standby status shall consist of verification that the channel is on-line and reachable.

(6) Daily channel check not required for flow monitors in standby status.

(7) LED may be utilized as the check source in lieu of a source of increased activity.

2.1.2 Implementation of the Requirements:

The general methodology for establishing low range gaseous effluent monitor setpoints is based upon a site release rate limit in μCi/sec derived from site specific meteorological dispersion conditions, radioisotopic distribution, and whole body and skin dose factors. The high alarm of the low range monitors will alarm/trip when the release rate from an individual vent will result in exceeding the limits in Section 3.1. 80% of Section 3.1 limits is considered to be the site release rate limit. The site release rate limit will be allocated among the licensed units' release points. The unit release rate limit will then be utilized for the determination of gaseous effluent monitor setpoints. A fraction of the unit release rate limit is then allotted to each release point and its monitor alert setpoint (μCi/cc) is derived using actual or fan design flow rates.

Administrative values are used to reduce each setpoint to account for the potential activity in other releases. These administrative values shall be reviewed based on actual release data.

For the purpose of implementation of Section 2.1, the alarm setpoint levels for low range effluent noble gas monitors are established to ensure that personnel are alerted when the noble gas releases are at a rate such that if the releases would continue for the year they would approach the total body dose rate of 500 mrem/yr and 3000 mrem/yr skin dose in Section 3.1. The equations in Section 3.1 of this manual provide the methodology for calculating the gaseous effluent dose rate.

The evaluation of doses due to releases of radioactive material can be simplified by the use of equivalent dose factors as defined in Section 2.1.2.1.

The equivalent dose factors will be evaluated periodically to assure that the best information on isotopic distribution is being used for the dose equivalent value.

2.1.2.1 Equivalent Dose Factor Determination

The equivalent whole body dose factor is calculated as follows:

$$K_{eq} = \sum_i [(K_i)\ (f_i)] \qquad (2\text{-}1)$$

Where:

K_{eq} = the equivalent whole body dose factor weighted by historical radionuclide distribution in releases in mrem/yr per $\mu Ci/m^3$.

K_i = the whole body dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

f_i = the fraction of noble gas radionuclide i in the total noble gas radionuclide mix.

The equivalent skin dose factor is calculated as follows:

$$(L + 1.1M)_{eq} = \sum_i [(L_i + 1.1M_i)\ (f_i)] \qquad (2\text{-}2)$$

Where:

$(L+1.1M)_{eq}$ = the equivalent skin dose factor due to beta and gamma emissions from all noble gases released, weighted by the historical radionuclide distribution in releases in mrem/yr per $\mu Ci/m^3$.

L_i = the skin dose factor due to the beta emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

M_i = the air dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrad/yr per $\mu Ci/m^3$ from Table 3-3.

f_i = the fraction of noble gas radionuclide i in the total noble gas radionuclide mix.

1.1 = unit conversion constant of 1.1 mrem/mrad converts air dose to skin dose.

2.1.2.2 Site Release Rate Limit (Q_{SITE})

The release rates corresponding to 80% of the whole body (Q_{WB}) and skin (Q_{SK}) dose rate limits are calculated using the equivalent dose factors defined in Section 2.1.2.1. The site release rate limit (Q_{SITE}) is the lower of Q_{WB} or Q_{SK}, thus assuring that the more restrictive dose rate limit will not be exceeded.

The Q_{SITE} is established as follows:

$$Q_{SITE,WB} = \frac{(D_{WB})\ (0.8)}{(K_{eq})\ (X/Q)_{SITE}} \qquad (2\text{-}3)$$

Where:

$Q_{SITE,WB}$ = the site release rate, in µCi/sec, that would deliver a dose rate 80% of the whole body dose rate limit, D_{WB}.

D_{WB} = whole body dose rate limit of 500 mrem/yr.

K_{eq} = equivalent whole body dose factor, in mrem/yr per µCi/m^3 weighted by the historical radionuclide distribution.

$(X/Q)_{SITE}$ = 8.91E-06, the highest calculated annual average dispersion parameter, in sec/m^3, at the Site Boundary for any of the 3 units, from Table 3-2.

0.8 = administrative factor to compensate for any unexpected variability in the radionuclide mix and to ensure that Site Boundary dose rate limits will not be exceeded.

$$Q_{SITE,SK} = \frac{(D_{SK})\ (0.8)}{(L+1.1M)_{eq}\ (X/Q)_{SITE}} \qquad (2\text{-}4)$$

Where:

$Q_{SITE,SK}$ = the site release rate limit, in µCi/sec, that would deliver a dose rate 80% of the skin dose rate limit, D_{SK}.

D_{SK} = skin dose rate limit of 3000 mrem/yr.

$(L+1.1M)_{eq}$ = equivalent skin dose factor, in mrem/yr per µCi/m^3, weighted by the radionuclide distribution.

$(X/Q)_{SITE}$ = 8.91E-06, the highest calculated annual average dispersion parameter, in sec/m^3, at the Site Boundary for any of the three units, from Table 3-2.

0.8 = administrative factor to compensate for any unexpected variability in the radionuclide mix and to ensure that Site Boundary dose rate limits will not be exceeded.

After determination of the Q_{SITE} whole body and skin dose rates (equations 2-3 and 2-4, respectively), the most conservative result will be used as Q_{SITE}, the site release rate limit.

2.1.2.3 Unit Release Rate Limits (Q_{UNIT})

Typically Q_{SITE} will be divided equally among operating units. If operational history dictates a larger fraction of the Q_{SITE} be assigned to a specific unit then a weighted average of each unit's contribution to the Q_{SITE} will be utilized to determine the Q_{UNIT}.

$$Q_{UNIT} = (f_{UNIT})\,(Q_{SITE}) \qquad (2\text{-}5)$$

Where:

Q_{UNIT} = unit release rate limit, in µCi/sec.

f_{UNIT} = the fraction (≤ 1) of noble gas historically released from a specific operating unit to the total of all noble gas released from the site.

Q_{SITE} = the site release rate limit, in µCi/sec determined in Section 2.1.2.2.

2.1.2.4 Setpoint Determination

To comply with the requirements in Section 2.1, the alarm/trip setpoints can now be established using the unit release rate limit (Q_{UNIT}) to ensure that the noble gas releases do not exceed the dose rate limits.

To allow for multiple sources of releases from different or common release points, the effluent monitor setpoint includes an administrative factor which allocates a percentage of the unit release rate limit to each of the release sources. Monitor setpoints will also be adjusted in accordance with Nuclear Administrative and Technical Manual procedures to account for monitor-specific characteristics.

Monitors RU-143 and RU-145

The alarm/trip setpoint for Monitors RU-143 and RU-145 is calculated as follows:

$$\text{Monitor Setpoint} \leq \frac{(Q_{UNIT})\,(a)}{(472)\,(\text{Flow Rate})} \qquad (2\text{-}6)$$

Where:

Monitor Setpoint = the setpoint for the effluent monitor, in µCi/cc, which provides a safe margin of assurance that the allowable dose rate limits will not be exceeded.

Q_{UNIT} = unit release rate limit, in µCi/sec, as determined in Section 2.1.2.3.

Flow Rate = the flow rate, in cfm, from flow rate monitors or the fan design flow rate for the release source under consideration.

472 = conversion factor, cubic centimeter/second per cubic feet/minute.

a = fraction of Q_{UNIT} allocated for a specific release point. The sum of these administrative values shall be less than or equal to one.

Monitor RU-12

The alarm/trip setpoint for Monitor RU-12, the Waste Gas Decay Tank Monitor, is calculated as follows:

$$\text{Monitor setpoint} \leq \frac{[(Q_{UNIT})\ (a)\ (0.9) - (H)\ (PF)\ (472)]}{(\text{Flow Rate})\ (472)} \qquad (2\text{-}7)$$

Where:

Monitor

Setpoint = the setpoint for the monitor, in µCi/cc at STP, which provides a safe margin of assurance that the allowable dose rate limits will not be exceeded.

Q_{UNIT} = unit release rate limit, in µCi/sec, as determined in Section 2.1.2.3.

Flow Rate = flow rate, in cfm at STP at which the tank will be released.

PF = the current process flow of the plant vent in CFM.

H = the current plant vent monitor concentration in µCi/cc.

a = fraction of Q_{UNIT} allocated for a specific release point. This administrative value should be equal to or less than the administrative value used for the Plant Vent.

0.9 = an administrative value to account for potential increases in activity from other contributors to the same release point.

472 = conversion factor, cubic centimeter/second per cubic feet/minute.

If there is no release associated with this monitor, the monitor setpoint should be established as close as practical to background to prevent spurious alarms, and yet assure an alarm should an inadvertent release occur.

2.1.2.5 Monitor Calibration

The Radiation Level Conversion Factor (RLF) for each monitor is entered into the Radiation Monitoring System Database and may change whenever the monitor is calibrated. Calibration is performed in accordance with Nuclear Administrative and Technical Manual procedures.

3.0 GASEOUS AND LIQUID EFFLUENT DOSE RATES

3.1 Requirements: Gaseous Effluents

The dose rate due to radioactive materials released in gaseous effluents from the site (see Figures 6-4 and 6-5) shall be limited to the following:

a. For noble gases: Less than or equal to 500 mrems/yr to the total body and less than or equal to 3000 mrems/yr to the skin, and

b. For I-131 and I-133, for tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to 1500 mrems/yr to any organ.

Applicability: At all times.

Action:

With the dose rate(s) exceeding the above limits, immediately decrease the release rate to within the above limits(s).

3.1.1 Surveillance Requirements:

a. The dose rate due to noble gases in gaseous effluents shall be determined to be within the above limits in accordance with the methods contained in Section 3.1.2.

b. The dose rate due to I-131, I-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 methods contained in Section 3.1.2 by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 3-1.

3.1.2 Implementation of the Requirements:

Noble Gases

Noble gas activity monitor setpoints are established at release rates which permit corrective action to be taken before exceeding the 10 CFR 20 annual dose limits as described in Section 2.0. The requirements for sampling and analysis of continuous and batch effluent releases are given in Table 3-1. The methods for sampling and analysis of continuous and batch effluent releases are given in the Nuclear Administrative and Technical Manual procedures. The dose rate in unrestricted areas shall be determined using the following equations.

For whole body dose rate:

$$D_{WB} = \sum_i [(K_i)\ (X/Q)_{SITE}(Q_i)] \qquad (3\text{-}1)$$

For skin dose rate:

$$D_{SK} = \sum_i [(L_i + 1.1M_i)\ (X/Q)_{SITE}(Q_i)] \qquad (3\text{-}2)$$

Where:

K_i = the whole body dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

Q_i = the release rate of radionuclide i, in $\mu Ci/sec$.

$(X/Q)_{SITE}$ = 8.91E-06, the highest calculated annual average dispersion parameter, in sec/m^3, for any of the three units, from Table 3-2.

D_{WB} = the annual whole body dose rate (mrem/yr.).

L_i = the skin dose factor due to the beta emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

M_i = the air dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrad/yr per $\mu Ci/m^3$ from Table 3-3.

D_{SK} = the annual skin dose rate (mrem/yr).

1.1 = unit conversion constant of 1.1 mrem/mrad converts air dose to skin dose.

I-131, I-133, tritium and radionuclides in particulate form with half-lives greater than 8 days

The methods for sampling and analysis of continuous and batch releases for I-131, I-133, tritium and radionuclides in particulate form with half-lives greater than 8 days, are given in the applicable Nuclear Administrative and Technical Manual procedures. Additional monthly and quarterly analyses shall be performed in accordance with Table 3-1. The total organ dose rate in unrestricted areas shall be determined by the following equation:

$$D_o = \sum_i [(P_i)\ (X/Q)_{SITE}\ (Q_i)] \qquad (3\text{-}3)$$

Where:

P_i = the dose factor, in mrem/yr per $\mu Ci/m^3$, for radionuclide i, for the inhalation pathway, from Table 3-4.

$(X/Q)_{SITE}$ = 8.91E-06, the highest calculated annual average dispersion parameter, in sec/m^3, at the Site Boundary, for any of the three units,

Q_i = the release rate of radionuclide i, in $\mu Ci/sec$

D_o = the total organ dose rate (mrem/yr).

TABLE 3-1

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

GASEOUS RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) (μCi/ml)[a]
A. Waste Gas Storage	P Each Tank Grab Sample	P Each Tank	Principal Gamma Emitters[g]	1.0E-04
B. Containment Purge	P Each Purge[b,c] Grab Sample	P Each Purge[b,c]	Principal Gamma Emitters[g]	1.0E-04
			H-3	1.0E-06
C. 1. DELETED 2. Plant Vent 3. Fuel Bldg. Exhaust	M[b,c] Grab Sample	M[b]	Principal Gamma Emitters[g]	1.0E-04
			H-3	1.0E-06
	Continuous[f]	4/M[d] Charcoal Sample	I-131	1.0E-12
			I-133	1.0E-10
	Continuous[f]	4/M[d] Particulate Sample	Principal Gamma Emitters[g] (I-131, Others)	1.0E-11
	Continuous[f]	M Composite Particulate Sample	Gross Alpha	1.0E-11
	Continuous[f]	Q Composite Particulate Sample	Sr-89, Sr-90	1.0E-11
D. All Radwaste Types as listed in A., B., and C., above.	Continuous[f]	Noble Gas Monitor	Noble Gases Gross Beta or Gamma	1.0E-06

Table 3-1 (Continued)

TABLE NOTATION

a The LLD is 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):

$$LLD = \frac{4.66 \cdot s_b}{E * V * 2.22E6 * Y * \exp(-\lambda \Delta t)}$$

Where:

LLD is the a priori lower limit of detection as defined above (as μCi per unit mass or volume). Current literature defines the LLD as the detection capability for the instrumentation only and the MDC minimum detectable concentration, as the detection capability for a given instrument, procedure and type of sample.

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

E is the counting efficiency (as counts per transformation),

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

2.22E6 is the number of transformations per minute per microcurie,

Y is the fractional radiochemical yield (when applicable),

λ is the radioactive decay constant for the particular radionuclide, and

Δt is the elapsed time between the midpoint of sample collection and time of counting (for plant effluents, not environmental samples).

The value of s_b used in the calculation of the LLD for a detection system shall be based on the actual observed variance of the background counting rate or of the counting rate of the blank samples (as appropriate) rather than on an unverified theoretically predicted variance. In calculating the LLD for a radionuclide determined by gamma-ray spectrometry the background should include the typical contributions of other radionuclides normally present in the samples. Typical values of E, V, Y, and Δt 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 3-1 (Continued)

TABLE NOTATION

b Analyses shall also be performed following SHUTDOWN, STARTUP, or a THERMAL POWER change exceeding 15% of the RATED THERMAL POWER within a 1-hour period if 1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has increased more than a factor of 3; and 2) the noble gas activity monitor on the plant vent shows that effluent activity has increased by more than a factor of 3. If the associated noble gas vent monitor is inoperable, samples must be obtained as soon as possible. Analyses shall be performed within a four-hour period. This requirement does not apply to the Fuel Building Exhaust.

c Sampling and analyses shall also be performed at least once per 31 days when purging time exceeds 30 days continuous.

d Samples shall be changed at least 4 times a month and analyses shall be completed within 48 hours after changing (or after removal from sampler). When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10.

e Tritium grab samples shall be taken at least monthly from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.

f 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 Requirements 3.1, 4.1 and 4.2 of the ODCM.

g The principal gamma emitters for which the LLD specification applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks which are measurable and identifiable, together with the above nuclides shall also be identified and reported in the Annual Radioactive Effluent Release Report.

TABLE 3-2

DISPERSION AND DEPOSITION PARAMETERS FOR LONG TERM RELEASES

AT THE SITE BOUNDARY

DIRECTION	UNIT 1 DISTANCE (METERS)	UNIT 1 X/Q (SEC/m^3)	UNIT 1 D/Q (m^{-2})	UNIT 2 DISTANCE (METERS)	UNIT 2 X/Q (SEC/m^3)	UNIT 2 D/Q (m^{-2})	UNIT 3 DISTANCE (METERS)	UNIT 3 X/Q (SEC/m^3)	UNIT 3 D/Q (m^{-2})
N	1037	4.93E-06	9.24E-09	1318	3.85E-06	6.17E-09	1661	3.54E-06	4.86E-09
NNE	1057	4.14E-06	1.19E-08	1342	3.18E-06	7.93E-09	1693	2.86E-06	6.23E-09
NE	2206	2.84E-06	6.84E-09	2545	2.42E-06	5.34E-09	2756	2.21E-06	4.65E-09
ENE	1967	2.51E-06	4.43E-09	2206	2.22E-06	3.64E-09	2337	2.08E-06	3.30E-09
E	1927	2.56E-06	3.24E-09	2163	2.27E-06	2.66E-09	2290	2.14E-06	2.41E-09
ESE	1967	2.61E-06	2.46E-09	2067	2.32E-06	2.11E-09	2023	2.37E-06	2.10E-09
SE	2049	3.56E-06	2.36E-09	2101	3.47E-06	2.26E-09	2256	3.24E-06	2.00E-09
SSE	2730	3.80E-06	1.58E-09	3026	3.43E-06	1.32E-09	2786	3.72E-06	1.52E-09
S	3006	5.07E-06	1.78E-09	2699	5.16E-06	1.97E-09	2346	5.90E-06	2.51E-09
SSW	2258	6.52E-06	3.20E-09	1836	7.90E-06	4.56E-09	1607	8.91E-06	5.73E-09
SW	1487	7.47E-06	5.65E-09	1208	7.72E-06	6.88E-09	1057	8.68E-06	8.61E-09
WSW	1251	4.52E-06	5.93E-09	1014	5.55E-06	8.44E-09	889	5.34E-06	8.83E-09
W	1225	4.73E-06	9.49E-09	993	5.86E-06	1.34E-08	871	6.72E-06	1.67E-08
WNW	1244	3.76E-06	6.76E-09	1010	4.67E-06	9.60E-09	885	5.37E-06	1.19E-08
NW	1254	3.43E-06	5.87E-09	1191	3.62E-06	6.40E-09	1045	4.17E-06	7.98E-09
NNW	1069	3.70E-06	7.26E-09	1342	2.85E-06	4.87E-09	1561	2.93E-06	4.58E-09

Reference: Distances are from the PVNGS ER-OL, Table 2.3-33. Dispersion and Deposition parameters are from a September, 1985, calculation by NUS Corporation based on 9 years of meteorological data; NUS Corporation letter NUS-ANPP-1386, dated October 4, 1985.

TABLE 3-3

DOSE FACTORS FOR NOBLE GASES AND DAUGHTERS

Radionuclide	Whole Body Dose Factor K_i $\frac{mrem\text{-}m^3}{yr\text{-}\mu Ci}$	Skin Dose Factor L_i $\frac{mrem\text{-}m^3}{yr\text{-}\mu Ci}$	Gamma Air Dose Factor M_i $\frac{mrad\text{-}m^3}{yr\text{-}\mu Ci}$	Beta Air Dose Factor N_i $\frac{mrad\text{-}m^3}{yr\text{-}\mu Ci}$
Kr-83m	7.56E-02	----------	1.93E+01	2.88E+02
Kr-85m	1.17E+03	1.46E+03	1.23E+03	1.97E+03
Kr-85	1.61E+01	1.34E+03	1.72E+01	1.95E+03
Kr-87	5.92E+03	9.73E+03	6.17E+03	1.03E+04
Kr-88	1.47E+04	2.37E+03	1.52E+04	2.93E+03
Kr-89	1.66E+04	1.01E+04	1.73E+04	1.06E+04
Kr-90	1.56E+04	7.29E+03	1.63E+04	7.83E+03
Xe-13lm	9.15E+01	4.76E+02	1.56E+02	1.11E+03
Xe-133m	2.51E+02	9.94E+02	3.27E+02	1.48E+03
Xe-133	2.94E+02	3.06E+02	3.53E+02	1.05E+03
Xe-135m	3.12E+03	7.11E+02	3.36E+03	7.39E+02
Xe-135	1.81E+03	1.86E+03	1.92E+03	2.46E+03
Xe-137	1.42E+03	1.22E+04	1.51E+03	1.27E+04
Xe-138	8.83E+03	4.13E+03	9.21E+03	4.75E+03
Ar-41	8.84E+03	2.69E+03	9.30E+03	3.28E+03

Reference: Regulatory Guide 1.109, Table B-1.

TABLE 3-4

P_i VALUES FOR THE INHALATION PATHWAY

(mrem/yr/μCi/m^3)

NUCLIDE	Age Group	Organ	P_i
H-3	TEEN	LIVER	1.27E+03
CR-51	TEEN	LUNG	2.10E+04
MN-54	TEEN	LUNG	1.98E+06
FE-59	TEEN	LUNG	1.53E+06
CO-58	TEEN	LUNG	1.34E+06
CO-60	TEEN	LUNG	8.72E+06
ZN-65	TEEN	LUNG	1.24E+06
SR-89	TEEN	LUNG	2.42E+06
SR-90	TEEN	BONE	1.08E+08
ZR-95	TEEN	LUNG	2.69E+06
SB-124	TEEN	LUNG	3.85E+06
I-131	CHILD	THYROID	1.62E+07
I-133	CHILD	THYROID	3.85E+06
CS-134	TEEN	LIVER	1.13E+06
CS-137	CHILD	BONE	9.07E+05
BA-140	TEEN	LUNG	2.03E+06
CE-141	TEEN	LUNG	6.14E+05
CE-144	TEEN	LUNG	1.34E+07

3.2 Requirements:Secondary System Liquid Waste Discharges To Onsite Evaporation Ponds or Circulating Water System - Concentration

The concentration of radioactive material discharged from secondary system liquid waste to the circulating water system shall be limited to:

5.0E-07 µCi/ml for the principal gamma emitters (except Ce-144)

3.0E-06 µCi/ml for Ce-144

1.0E-06 µCi/ml for I-131.

1.0E-03 µCi/ml for H-3

The concentration of radioactive material discharged from secondary system liquid waste to the onsite evaporation ponds shall be limited to:

2.0E-06 µCi/ml for Cs-134

2.0E-06 µCi/ml for Cs-137

The concentrations specified in 10 CFR Part 20.1001-20.2401, Appendix B, Table 2, Column 2, for all other isotopes

Applicability: At all times.

Action:

When any secondary system liquid waste discharge pathway concentration determined in accordance with the surveillance requirements given below exceeds the above Requirements, divert that discharge pathway to the liquid radwaste system without delay or terminate the discharge.

3.2.1 Surveillance Requirements:

a. Secondary system liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 3-5.

3.2.2 Implementation of the Requirements:

This requirement is implemented by Nuclear Administrative and Technical Manual procedures.

TABLE 3-5

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

Secondary System Liquid Release Pathway	Destination	Sampling & Analysis Frequency	Notes	Type Of Activity Analysis	Lower Limit Of Detection (LLD)[a] (μCi/ml)
1. Chemical Waste Neutralizer Tank (CWNT)	retention basin	P Each Batch		Principal Gamma Emitters[c]	5.0E-07
	liquid radwaste	N.A.		I-131	1.0E-06
				H-3	1.0E-05
2. Steam Generator Blowdown Low TDS Sump	circ. water	P Each Batch	1	Principal Gamma Emitters[c]	5.0E-07
	CWNT	N.A.		I-131	1.0E-06
				H-3	1.0E-05
3. Condensate					
a. Condensate Polishing Low TDS Sump	circ. water	P Each Batch	1	Principal Gamma Emitters[c]	5.0E-07
	CWNT	N.A.		I-131	1.0E-06
				H-3	1.0E-05
b. Initial Backwash	(low TDS sump) to circ. water	P Each Discharge		Principal Gamma Emitters[c]	5.0E-07
				I-131	1.0E-06
	(low TDS sump) to CWNT	N.A.		H-3	1.0E-05
c. Pre-service rinse effluent	retention basin through SC-N-V069	P Each Discharge	2	Principal Gamma Emitters[c]	5.0E-07
				I-131	1.0E-06
	condenser through SC-N-UV232	N.A.		H-3	1.0E-05
d. Overboard condensate	circ water through CD-N-V194	P Each Discharge		Principal Gamma Emitters[c]	5.0E-07
				I-131	1.0E-06
	retention basin through SC-N-V079	P Each Discharge	2	H-3	1.0E-05
4. Turbine Building Sump	retention basin	D Grab Sample	1	Principal Gamma Emitters[c]	5.0E-07
	CWNT	N.A.		I-131	1.0E-06
				H-3	1.0E-05

TABLE 3-5

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

Secondary System Liquid Release Pathway	Destination	Sampling & Analysis Frequency	Notes	Type Of Activity Analysis	Lower Limit Of Detection (LLD)[a] (µCi/ml)
5. North & South Condenser Area Sumps	retention basin	D Grab Sample	1	Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	CWNT	N.A.			
6. Steam Generator Blowdown to Retention Basin	retention basin through SC-N-V064	P Each Discharge	2	Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
7. Retention Basin to Evaporation Pond	evaporation pond	P Each Batch		Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05

1 Sampling and analysis are required only when concentration for chemical waste neutralizer tank or steam generator activity exceeds the requirement

2 RU-200 shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST at the frequencies shown in Table 3-6.The Alarm/Trip setpoints for RU-200 are set to ensure that the concentrations in the retention basins do not exceed the Requirement

Table 3-5 (Continued)

TABLE NOTATION

a The LLD is defined 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:

$$LLD = \frac{4.66\ s_b}{E * V * 2.22E6 * Y * \exp(-\lambda \Delta t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above as microcuries per unit mass or volume,

s_b is the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate as counts per minute,

E is the counting efficiency as counts per disintegration,

V is the sample size in units of mass or volume,

2.22E6 is the number of disintegrations per minute per microcurie

Y is the fractional radiochemical yield when applicable,

λ is the radioactive decay constant for the particular radionuclide, and

Δt is the elapsed time between midpoint of sample collection and time of counting.

Typical values of E, V, Y, and Δt 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.

b 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 to assure representative sampling.

c The principal gamma emitters for which the LLD specification 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 3.0E-06. 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 Annual Radioactive Effluent Release Report.

d 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

TABLE 3-6

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

Instrument	Channel Check	Source Check	Channel Calibration	Channel Functional Test	Mode in which Surveillance is Required
RU-200	P	N. A.	R	Q	See Table 3-7

TABLE 3-7

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

Secondary System Liquid Release Pathway	Mode in which Surveillance is Required	Action if RU-200 is inoperable
Pre-service rinse to retention basins	At All Times	Obtain grab sample at least once per 12 hours and analyze in accordance with section 3.2
Condensate overboard to retention basins	1-4	Obtain grab sample at least once per 12 hours and analyses in accordance with section 3.2
Steam Generator Blowdown/Drain to retention basins	At All Times	Modes 1-4: Suspend the release Modes 5,6 & defueled: Obtain grab sample at least once per 12 hours and analyze in accordance with section 3.2

4.0 GASEOUS & LIQUID EFFLUENTS - DOSE

4.1 Requirements: Noble Gases

The air dose due to noble gases released in gaseous effluents, from each reactor unit to areas at and beyond the SITE BOUNDARY (see Figure 6-4 and 6-5) shall be limited to the following:

a. During any calendar quarter: Less than or equal to 5 mrads for gamma radiation and less than or equal to 10 mrads for beta radiation and,

b. During any calendar year: Less than or equal to 10 mrads for gamma radiation and less than or equal to 20 mrads for beta radiation.

Applicability: At all times.

Action:

With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

4.1.1 Surveillance Requirements:

a. Cumulative dose contributions for the current calendar quarter and current calendar year for noble gases shall be determined in accordance with the methodology contained in Section 4.1.2 at least once per 31 days.

4.1.2 Implementation of the Requirement: Noble Gas

The air dose in unrestricted areas beyond the site boundary due to noble gases released in gaseous effluents from each unit during any specified time period shall be determined by the following equations:

For gamma radiation:

$$D\gamma_u = (3.17E\text{-}08)\,\Sigma_i\,[(M_i)\,(X/Q)_{UNIT}(Q_i)] \quad (4\text{-}1)$$

For beta radiation:

$$D\beta_u = (3.17E\text{-}08)\,\Sigma_i\,[(N_i)\,(X/Q)_{UNIT}(Q_i)] \quad (4\text{-}2)$$

Where:

M_i = the air dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrad/yr per $\mu Ci/m^3$ from Table 3-3.

N_i = the air dose factor due to beta emissions for each identified noble gas radionuclide i, in mrad/yr per $\mu Ci/m^3$ from Table 3-3.

$(X/Q)_{UNIT}$ = the highest calculated annual average dispersion parameter, in sec/m^3, at the site boundary for the particular unit, from Table 3-2.

=7.47E-06 from Unit 1
=7.90E-06 from Unit 2
=8.91E-06 from Unit 3

$D\gamma_u$ = the total gamma air dose, for the particular unit, in mrad, due to noble gases released in gaseous effluents for a specified time period at the SITE BOUNDARY.

$D\beta_u$ = the total beta air dose, for the particular unit, in mrad, due to noble gases released in gaseous effluents for a specified time period at the SITE BOUNDARY.

Q_i = the integrated release, from the particular unit, in μCi, of each identified noble gas radionuclide i, in gaseous effluents for a specified time period.

3.17E-08 = the inverse of seconds in a year (yr/sec).

The cumulative gamma air dose and beta air dose for a quarterly or annual evaluation shall be based on the calculated dose contribution from each specified time period occurring during the reporting time period.

4.2 Requirement: Iodine-131, Iodine-133, Tritium, and All Radionuclides in Particulate Form With Half-Lives Greater Than 8 Days

The dose to a MEMBER OF THE PUBLIC from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figures 6-4 and 6-5) shall be limited to the following:

a. During any calendar quarter: Less than or equal to 7.5 mrems to any organ and,

b. During any calendar year: Less than or equal to 15 mrems to any organ.

Applicability: At all times.

Action:

With the calculated dose from the release of iodine-131, iodine-133, tritium, and radionuclides in particulate form with half-lives greater than 8 days, in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, a Special Report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

4.2.1 Surveillance Requirements:

a. Cumulative dose contributions for the current calendar quarter and current calendar year for iodine-131, iodine-133, tritium, and radionuclides in particulate form with half-lives greater than 8 days shall be determined in accordance with the methodology and parameters contained in Section 4.2.2 at least once per 31 days.

4.2.2 Implementation of the Requirement

The organ dose to an individual from I-131, I-133, tritium, and all radionuclides in particulate form, with half-lives greater than eight days, in gaseous effluents released to unrestricted areas from each reactor unit is calculated using the following expressions:

$$D_{ou} = (3.17E\text{-}08)\ \Sigma_i\ [\Sigma_k\ (R_{ik}\ W_k)\ (Qi)] \qquad (4\text{-}3)$$

Where:

D_{ou} = the total accumulated organ dose from gaseous effluents for a particular unit, to a MEMBER OF THE PUBLIC, in mrem, at the SITE BOUNDARY or at the controlling location.

Q_i = the quantity of radionuclide i, in μCi, released in gaseous effluents from a particular unit.

R_{ik} = the dose factor for each identified radionuclide i, for pathway k (for the inhalation pathway in mrem/yr per μCi/m^3 and for the food and ground plane pathways in m^2 - mrem/yr per μCi/sec, except H-3, which has units of mrem/yr per μCi/m^3) at the controlling location. The R_{ik}'s for each age group are given in Tables 4-1 through 4-15.

3.17E-08 = the inverse of seconds per year (yr/sec).

W_k = the highest annual average dispersion or deposition parameter for the particular unit, used for estimating the dose at the site boundary or to a MEMBER OF THE PUBLIC at the controlling location for the particular unit.

= $(X/Q)_{UNIT}$, in sec/m^3 for the inhalation pathway and for all tritium calculations, for organ dose at the site boundary, from Table 3-2.

=7.47E-06 from Unit 1
=7.90E-06 from Unit 2
=8.91E-06 from Unit 3

= $(X/Q)_{UNIT}$, in sec/m^3 for the inhalation pathway and for all tritium calculations, for organ dose at the controlling location, from Table 4-16.

=2.92E-06 from Unit 1
=2.19E-06 from Unit 2
=2.31E-06 from Unit 3

= $(D/Q)_{UNIT}$, in m^{-2}, for the food and ground plane pathways, for organ dose at the site boundary, from Table 3-2.

=1.19E-08 from Unit 1
=1.34E-08 from Unit 2
=1.67E-08 from Unit 3

= $(D/Q)_{UNIT}$, in m^{-2}, for the food and ground plane pathways, for organ dose at the controlling location, from Table 4-16.

=3.25E-09 from Unit 1
=3.88E-10 from Unit 2
=4.21E-10 from Unit 3

Residences, vegetable gardens and milk animals located within 5 miles of the site will be identified during the annual land use census. The controlling pathway and location will be identified and will be used for all MEMBER OF THE PUBLIC dose evaluations.

The R_i values were calculated in accordance with the methodologies in NUREG-0133. The following site specific information was used to calculate R_i:

	Value
The length of the grazing season for milk animals (f_s). Ref. ER-OL, Section 2.1.3.4.3	0.75
The length of the grazing season for meat animals (f_s). Ref. ER-OL, Section 2.1.3.4.4	0.25
The fraction of daily feed derived from pasture while on pasture for milk animals (f_p). Ref. ER-OL, Section 2.1.3.4.3	0.35
The fraction of daily feed derived from pasture while on pasture for meat animals (f_p). Ref. ER-OL, Section 2.1.3.4.3	0.05
The fraction of year vegetables are grown, (f_l) approximation. Ref. ER-OL, Section 2.1.3.4, Table 2.1-8.	0.667
The annual absolute humidity (g/m^3), H, Ref. UFSAR, Table 2.3-16	6

4.3 Requirements: Gaseous Radwaste Treatment

The GASEOUS RADWASTE SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases, from each reactor unit, from the site (see Figures 6-4 and 6-5) when averaged over 31 days, would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation. The VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figures 6-4 and 6-5) when averaged over 31 days would exceed 0.3 mrem to any organ of a MEMBER OF THE PUBLIC.

Applicability: At all times:

Action:

With radioactive gaseous waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, a Special Report which includes the following information:

a. Identification of the inoperable equipment or subsystems and the reason for inoperability,

b. Action(s) taken to restore the inoperable equipment to OPERABLE status, and

c. Summary description of action(s) taken to prevent a recurrence.

4.3.1 Surveillance Requirements:

a. Doses due to gaseous releases from the site shall be projected at least once per 31 days, in accordance with the methodology and parameters in Section 4.3.2.

4.3.2 Implementation of the Requirement

Where possible, consideration for expected operational evolutions (i.e., outages, etc.) should be taken in the dose projections.

Dose Projection - Noble Gases

The air dose, in mrads for the current quarter is determined using the methodology described in Section 4.1.2. This information is used to determine an air dose projection for the next 31 days using the following equations:

For gamma radiation:

$$31 \text{ day } \gamma = (D\gamma \text{ qtr}/T\text{qtr})\ 31 + CD\gamma \qquad (4\text{-}4)$$

For beta radiation:

$$31 \text{ day } \beta = (D\beta \text{ qtr}/T\text{qtr})\ 31 + CD\beta \qquad (4\text{-}5)$$

Where:

$D\gamma$ qtr = the total gamma air dose due to noble gases released in gaseous effluents for the current quarter, in mrads, at the site boundary.

$D\beta$ qtr = the total beta air dose due to noble gases released in gaseous effluents for the current quarter, in mrads, at the site boundary.

Tqtr = the time period, in days, over which $D\gamma$ qtr and $D\beta$ qtr were integrated.

31 = the number of days over which the dose projections are made.

31 day γ = the 31 day projected gamma air dose due to noble gases released in gaseous effluents, in mrads, at the site boundary.

31 day β = the 31 day projected beta air dose due to noble gases released in gaseous effluents, in mrads, at the site boundary.

$CD\gamma$ = any current or projected gamma air dose, in mrads, due to noble gases released in gaseous effluents, which could have a significant impact on 31 day γ.

$CD\beta$ = any current or projected beta air dose, in mrads, due to noble gases released in gaseous effluents, which could have a significant impact on 31 day β.

Dose Projection - I-131, I-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days

The organ dose, in mrem, for a particular unit, for the current quarter is determined using the methodology described in Section 4.2.2 of this manual. This information is used to determine an organ dose projection for the next 31 days using the following equation:

$$31day_o = (D_o\,qtr/Tqtr)31 + CD_o \qquad (4\text{-}6)$$

where:

D_o qtr = the total organ dose from a particular unit due to I-131, I-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days, released in gaseous effluents for the current quarter, in mrem.

Tqtr = the time period, in days, over which $D_o$qtr was integrated.

31 = the number of days over which the dose projections are made.

31 day_o = the 31 day projected organ dose, in mrem, from a particular unit.

CD_o = any current or projected organ dose for a particular unit, in mrem, which could have a significant impact on 31 day_o.

TABLE 4-1

Ri DOSE CONVERSION FACTORS FOR THE GROUND PLANE PATHWAY

NUCLIDE	T. BODY	SKIN
H-3	0.00E+00	0.00E+00
CR-51	4.66E+06	5.51E+06
MN-54	1.39E+09	1.63E+09
FE-59	2.73E+08	3.21E+08
CO-58	3.79E+08	4.44E+08
CO-60	2.15E+10	2.53E+10
ZN-65	7.47E+08	8.59E+08
SR-89	2.16E+04	2.51E+04
SR-90	0.00E+00	0.00E+00
ZR-95	2.45E+08	2.84E+08
SB-124	5.98E+08	6.90E+08
I-131	1.72E+07	2.09E+07
I-133	2.45E+06	2.98E+06
CS-134	6.86E+09	8.00E+09
CS-137	1.03E+10	1.20E+10
BA-140	2.05E+07	2.35E+07
CE-141	1.37E+07	1.54E+07
CE-144	6.95E+07	8.04E+07

TABLE 4-2

Ri DOSE CONVERSION FACTORS FOR THE VEGETATION

PATHWAY - ADULT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	2.87E+03	2.87E+03	2.87E+03	2.87E+03	2.87E+03	2.87E+03
CR-51	0.00E+00	0.00E+00	4.00E+04	2.39E+04	8.82E+03	5.31E+04	1.01E+07
MN-54	0.00E+00	2.97E+08	5.66E+07	0.00E+00	8.83E+07	0.00E+00	9.09E+08
FE-59	1.14E+08	2.68E+08	1.03E+08	0.00E+00	0.00E+00	7.49E+07	8.93E+08
CO-58	0.00E+00	2.84E+07	6.38E+07	0.00E+00	0.00E+00	0.00E+00	5.76E+08
CO-60	0.00E+00	1.59E+08	3.51E+08	0.00E+00	0.00E+00	0.00E+00	2.99E+09
ZN-65	3.00E+08	9.56E+08	4.32E+08	0.00E+00	6.39E+08	0.00E+00	6.02E+08
SR-89	9.08E+09	0.00E+00	2.61E+08	0.00E+00	0.00E+00	0.00E+00	1.46E+09
SR-90	5.76E+11	0.00E+00	1.41E+11	0.00E+00	0.00E+00	0.00E+00	1.67E+10
ZR-95	1.08E+06	3.47E+05	2.35E+05	0.00E+00	5.45E+05	0.00E+00	1.10E+09
SB-124	9.53E+07	1.80E+06	3.78E+07	2.31E+05	0.00E+00	7.42E+07	2.71E+09
I-131	5.49E+07	7.85E+07	4.50E+07	2.57E+10	1.35E+08	0.00E+00	2.07E+07
I-133	1.39E+06	2.42E+06	7.38E+05	3.56E+08	4.22E+06	0.00E+00	2.17E+06
CS-134	4.44E+09	1.06E+10	8.64E+09	0.00E+00	3.42E+09	1.13E+09	1.85E+08
CS-137	6.06E+09	8.29E+09	5.43E+09	0.00E+00	2.81E+09	9.36E+08	1.60E+08
BA-140	9.43E+07	1.19E+05	6.18E+06	0.00E+00	4.03E+04	6.78E+04	1.94E+08
CE-141	1.73E+05	1.17E+05	1.33E+04	0.00E+00	5.44E+04	0.00E+00	4.48E+08
CE-144	3.12E+07	1.30E+07	1.67E+06	0.00E+00	7.73E+06	0.00E+00	1.05E+10

TABLE 4-3

Ri DOSE CONVERSION FACTORS FOR THE VEGETATION

PATHWAY - TEEN RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	3.36E+03	3.36E+03	3.36E+03	3.36E+03	3.36E+03	3.36E+03
CR-51	0.00E+00	0.00E+00	5.60E+04	3.11E+04	1.23E+04	7.99E+04	9.41E+06
MN-54	0.00E+00	4.41E+08	8.74E+07	0.00E+00	1.31E+08	0.00E+00	9.04E+08
FE-59	1.69E+08	3.94E+08	1.52E+08	0.00E+00	0.00E+00	1.24E+08	9.31E+08
CO-58	0.00E+00	4.16E+07	9.59E+07	0.00E+00	0.00E+00	0.00E+00	5.74E+08
CO-60	0.00E+00	2.42E+08	5.45E+08	0.00E+00	0.00E+00	0.00E+00	3.15E+09
ZN-65	4.11E+08	1.43E+09	6.65E+08	0.00E+00	9.12E+08	0.00E+00	6.04E+08
SR-89	1.43E+10	0.00E+00	4.10E+08	0.00E+00	0.00E+00	0.00E+00	1.70E+09
SR-90	7.30E+11	0.00E+00	1.80E+11	0.00E+00	0.00E+00	0.00E+00	2.05E+10
ZR-95	1.64E+06	5.17E+05	3.56E+05	0.00E+00	7.60E+05	0.00E+00	1.19E+09
SB-124	1.47E+08	2.70E+06	5.73E+07	3.33E+05	0.00E+00	1.28E+08	2.96E+09
I-131	5.29E+07	7.41E+07	3.98E+07	2.16E+10	1.28E+08	0.00E+00	1.47E+07
I-133	1.29E+06	2.19E+06	6.68E+05	3.06E+08	3.84E+06	0.00E+00	1.66E+06
CS-134	6.90E+09	1.62E+10	7.53E+09	0.00E+00	5.16E+09	1.97E+09	2.02E+08
CS-137	9.86E+09	1.31E+10	4.57E+09	0.00E+00	4.46E+09	1.73E+09	1.87E+08
BA-140	1.07E+08	1.31E+05	6.88E+06	0.00E+00	4.44E+04	8.80E+04	1.65E+08
CE-141	2.61E+05	1.74E+05	2.00E+04	0.00E+00	8.19E+04	0.00E+00	4.98E+08
CE-144	5.11E+07	2.12E+07	2.75E+06	0.00E+00	1.26E+07	0.00E+00	1.29E+10

TABLE 4-4

Ri DOSE CONVERSION FACTORS FOR THE VEGETATION

PATHWAY - CHILD RECEPTOR

NUCLIDES	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	5.23E+03	5.23E+03	5.23E+03	5.23E+03	5.23E+03	5.23E+03
CR-51	0.00E+00	0.00E+00	1.08E+05	6.02E+04	1.64E+04	1.10E+05	5.75E+06
MN-54	0.00E+00	6.49E+08	1.73E+08	0.00E+00	1.82E+08	0.00E+00	5.45E+08
FE-59	3.79E+08	6.13E+08	3.05E+08	0.00E+00	0.00E+00	1.78E+08	6.38E+08
CO-58	0.00E+00	6.21E+07	1.90E+08	0.00E+00	0.00E+00	0.00E+00	3.62E+08
CO-60	0.00E+00	3.70E+08	1.09E+09	0.00E+00	0.00E+00	0.00E+00	2.05E+09
ZN-65	7.93E+08	2.11E+09	1.31E+09	0.00E+00	1.33E+09	0.00E+00	3.71E+08
SR-89	3.44E+10	0.00E+00	9.83E+08	0.00E+00	0.00E+00	0.00E+00	1.33E+09
SR-90	1.22E+12	0.00E+00	3.09E+11	0.00E+00	0.00E+00	0.00E+00	1.64E+10
ZR-95	3.72E+06	8.17E+05	7.27E+05	0.00E+00	1.17E+06	0.00E+00	8.52E+08
SB-124	3.38E+08	4.39E+06	1.19E+08	7.47E+05	0.00E+00	1.88E+08	2.12E+09
I-131	9.95E+07	1.00E+08	5.68E+07	3.31E+10	1.64E+08	0.00E+00	8.90E+06
I-133	2.36E+06	2.91E+06	1.10E+06	5.41E+08	4.85E+06	0.00E+00	1.17E+06
CS-134	1.57E+10	2.57E+10	5.43E+09	0.00E+00	7.98E+09	2.86E+09	1.39E+08
CS-137	2.34E+10	2.24E+10	3.31E+09	0.00E+00	7.31E+09	2.63E+09	1.40E+08
BA-140	2.20E+08	1.93E+05	1.28E+07	0.00E+00	6.27E+04	1.15E+05	1.11E+08
CE-141	6.15E+05	3.07E+05	4.55E+04	0.00E+00	1.34E+05	0.00E+00	3.83E+08
CE-144	1.24E+08	3.89E+07	6.62E+06	0.00E+00	2.15E+07	0.00E+00	1.01E+10

TABLE 4-5

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MEAT PATHWAY - ADULT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	4.33E+02	4.33E+02	4.33E+02	4.33E+02	4.33E+02	4.33E+02
CR-51	0.00E+00	0.00E+00	3.44E+02	2.06E+02	7.58E+01	4.57E+02	8.65E+04
MN-54	0.00E+00	2.71E+06	5.18E+05	0.00E+00	8.08E+05	0.00E+00	8.31E+06
FE-59	2.60E+07	6.11E+07	2.34E+07	0.00E+00	0.00E+00	1.71E+07	2.04E+08
CO-58	0.00E+00	2.84E+06	6.36E+06	0.00E+00	0.00E+00	0.00E+00	5.75E+07
CO-60	0.00E+00	2.61E+07	5.76E+07	0.00E+00	0.00E+00	0.00E+00	4.90E+08
ZN-65	9.97E+07	3.17E+08	1.43E+08	0.00E+00	2.12E+08	0.00E+00	2.00E+08
SR-89	3.41E+07	0.00E+00	9.79E+05	0.00E+00	0.00E+00	0.00E+00	5.47E+06
SR-90	4.43E+09	0.00E+00	1.09E+09	0.00E+00	0.00E+00	0.00E+00	1.28E+08
ZR-95	2.68E+05	8.58E+04	5.81E+04	0.00E+00	1.35E+05	0.00E+00	2.72E+08
SB-124	2.67E+06	5.05E+04	1.06E+06	6.48E+03	0.00E+00	2.08E+06	7.59E+07
I-131	1.36E+05	1.94E+05	1.11E+05	6.37E+07	3.33E+05	0.00E+00	5.13E+04
I-133	4.56E-03	7.94E-03	2.42E-03	1.17E+00	1.39E-02	0.00E+00	7.14E-03
CS-134	2.17E+08	5.17E+08	4.23E+08	0.00E+00	1.67E+08	5.56E+07	9.05E+06
CS-137	3.11E+08	4.25E+08	2.78E+08	0.00E+00	1.44E+08	4.79E+07	8.22E+06
BA-140	4.35E+05	5.46E+02	2.85E+04	0.00E+00	1.86E+02	3.13E+02	8.95E+05
CE-141	8.87E+02	6.00E+02	6.80E+01	0.00E+00	2.79E+02	0.00E+00	2.29E+06
CE-144	4.23E+05	1.77E+05	2.27E+04	0.00E+00	1.05E+05	0.00E+00	1.43E+08

TABLE 4-6

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MEAT

PATHWAY - TEEN RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	2.58E+02	2.58E+02	2.58E+02	2.58E+02	2.58E+02	2.58E+02
CR-51	0.00E+00	0.00E+00	2.75E+02	1.53E+02	6.03E+01	3.93E+02	4.62E+04
MN-54	0.00E+00	2.07E+06	4.11E+05	0.00E+00	6.18E+05	0.00E+00	4.25E+06
FE-59	2.08E+07	4.85E+07	1.87E+07	0.00E+00	0.00E+00	1.53E+07	1.15E+08
CO-58	0.00E+00	2.19E+06	5.04E+06	0.00E+00	0.00E+00	0.00E+00	3.02E+07
CO-60	0.00E+00	2.03E+07	4.56E+07	0.00E+00	0.00E+00	0.00E+00	2.64E+08
ZN-65	7.01E+07	2.43E+08	1.14E+08	0.00E+00	1.56E+08	0.00E+00	1.03E+08
SR-89	2.88E+07	0.00E+00	8.24E+05	0.00E+00	0.00E+00	0.00E+00	3.43E+06
SR-90	2.87E+09	0.00E+00	7.08E+08	0.00E+00	0.00E+00	0.00E+00	8.05E+07
ZR-95	2.14E+05	6.76E+04	4.65E+04	0.00E+00	9.93E+04	0.00E+00	1.56E+08
SB-124	2.18E+06	4.02E+04	8.52E+05	4.95E+03	0.00E+00	1.91E+06	4.40E+07
I-131	1.13E+05	1.58E+05	8.49E+04	4.61E+07	2.72E+05	0.00E+00	3.13E+04
I-133	3.82E-03	6.48E-03	1.98E-03	9.04E-01	1.14E-02	0.00E+00	4.90E-03
CS-134	1.73E+08	4.07E+08	1.89E+08	0.00E+00	1.29E+08	4.94E+07	5.06E+06
CS-137	2.58E+08	3.43E+08	1.20E+08	0.00E+00	1.17E+08	4.54E+07	4.88E+06
BA-140	3.59E+05	4.40E+02	2.31E+04	0.00E+00	1.49E+02	2.96E+02	5.54E+05
CE-141	7.45E+02	4.97E+02	5.71E+01	0.00E+00	2.34E+02	0.00E+00	1.42E+06
CE-144	3.56E+05	1.47E+05	1.91E+04	0.00E+00	8.80E+04	0.00E+00	8.96E+07

TABLE 4-7

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MEAT PATHWAY - CHILD RECEPTOR

NUCLIDES	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	3.12E+02	3.12E+02	3.12E+02	3.12E+02	3.12E+02	3.12E+02
CR-51	0.00E+00	0.00E+00	4.29E+02	2.38E+02	6.51E+01	4.35E+02	2.28E+04
MN-54	0.00E+00	2.37E+06	6.31E+05	0.00E+00	6.64E+05	0.00E+00	1.99E+06
FE-59	3.68E+07	5.96E+07	2.97E+07	0.00E+00	0.00E+00	1.73E+07	6.20E+07
CO-58	0.00E+00	2.55E+06	7.82E+06	0.00E+00	0.00E+00	0.00E+00	1.49E+07
CO-60	0.00E+00	2.40E+07	7.09E+07	0.00E+00	0.00E+00	0.00E+00	1.33E+08
ZN-65	1.05E+08	2.80E+08	1.74E+08	0.00E+00	1.77E+08	0.00E+00	4.92E+07
SR-89	5.45E+07	0.00E+00	1.56E+06	0.00E+00	0.00E+00	0.00E+00	2.11E+06
SR-90	3.70E+09	0.00E+00	9.39E+08	0.00E+00	0.00E+00	0.00E+00	4.99E+07
ZR-95	3.81E+05	8.36E+04	7.45E+04	0.00E+00	1.20E+05	0.00E+00	8.73E+07
SB-124	3.95E+06	5.12E+04	1.38E+06	8.72E+03	0.00E+00	2.19E+06	2.47E+07
I-131	2.09E+05	2.11E+05	1.20E+05	6.96E+07	3.46E+05	0.00E+00	1.87E+04
I-133	7.09E-03	8.77E-03	3.32E-03	1.63E+00	1.46E-02	0.00E+00	3.53E-03
CS-134	3.05E+08	5.00E+08	1.06E+08	0.00E+00	1.55E+08	5.56E+07	2.70E+06
CS-137	4.75E+08	4.55E+08	6.71E+07	0.00E+00	1.48E+08	5.33E+07	2.85E+06
BA-140	6.63E+05	5.81E+02	3.87E+04	0.00E+00	1.89E+02	3.46E+02	3.36E+05
CE-141	1.40E+03	6.99E+02	1.04E+02	0.00E+00	3.07E+02	0.00E+00	8.72E+05
CE-144	6.72E+05	2.11E+05	3.58E+04	0.00E+00	1.17E+05	0.00E+00	5.49E+07

TABLE 4-8

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MILK PATHWAY - ADULT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.02E+03	1.02E+03	1.02E+03	1.02E+03	1.02E+03	1.02E+03
CR-51	0.00E+00	0.00E+00	8.28E+03	4.95E+03	1.82E+03	1.10E+04	2.08E+06
MN-54	0.00E+00	3.99E+06	7.61E+05	0.00E+00	1.19E+06	0.00E+00	1.22E+07
FE-59	9.69E+06	2.28E+07	8.73E+06	0.00E+00	0.00E+00	6.36E+06	7.59E+07
CO-58	0.00E+00	1.74E+06	3.90E+06	0.00E+00	0.00E+00	0.00E+00	3.53E+07
CO-60	0.00E+00	8.41E+06	1.85E+07	0.00E+00	0.00E+00	0.00E+00	1.58E+08
ZN-65	6.34E+08	2.02E+09	9.12E+08	0.00E+00	1.35E+09	0.00E+00	1.27E+09
SR-89	4.90E+08	0.00E+00	1.41E+07	0.00E+00	0.00E+00	0.00E+00	7.86E+07
SR-90	2.43E+10	0.00E+00	5.96E+09	0.00E+00	0.00E+00	0.00E+00	7.02E+08
ZR-95	3.39E+02	1.09E+02	7.37E+01	0.00E+00	1.71E+02	0.00E+00	3.45E+05
SB-124	9.11E+06	1.72E+05	3.61E+06	2.21E+04	0.00E+00	7.09E+06	2.59E+08
I-131	7.77E+07	1.11E+08	6.37E+07	3.64E+10	1.91E+08	0.00E+00	2.93E+07
I-133	1.02E+06	1.77E+06	5.39E+05	2.60E+08	3.08E+06	0.00E+00	1.59E+06
CS-134	2.83E+09	6.73E+09	5.50E+09	0.00E+00	2.18E+09	7.23E+08	1.18E+08
CS-137	3.83E+09	5.24E+09	3.43E+09	0.00E+00	1.78E+09	5.91E+08	1.01E+08
BA-140	7.11E+06	8.93E+03	4.66E+05	0.00E+00	3.04E+03	5.11E+03	1.46E+07
CE-141	8.73E+03	5.90E+03	6.70E+02	0.00E+00	2.74E+03	0.00E+00	2.26E+07
CE-144	1.01E+06	4.21E+05	5.41E+04	0.00E+00	2.50E+05	0.00E+00	3.41E+08

TABLE 4-9

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MILK

PATHWAY - TEEN RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.33E+03	1.33E+03	1.33E+03	1.33E+03	1.33E+03	1.33E+03
CR-51	0.00E+00	0.00E+00	1.45E+04	8.03E+03	3.17E+03	2.06E+04	2.43E+06
MN-54	0.00E+00	6.64E+06	1.32E+06	0.00E+00	1.98E+06	0.00E+00	1.36E+07
FE-59	1.69E+07	3.95E+07	1.52E+07	0.00E+00	0.00E+00	1.24E+07	9.33E+07
CO-58	0.00E+00	2.93E+06	6.76E+06	0.00E+00	0.00E+00	0.00E+00	4.04E+07
CO-60	0.00E+00	1.42E+07	3.21E+07	0.00E+00	0.00E+00	0.00E+00	1.86E+08
ZN-65	9.74E+08	3.38E+09	1.58E+09	0.00E+00	2.17E+09	0.00E+00	1.43E+09
SR-89	9.03E+08	0.00E+00	2.59E+07	0.00E+00	0.00E+00	0.00E+00	1.08E+08
SR-90	3.43E+10	0.00E+00	8.48E+09	0.00E+00	0.00E+00	0.00E+00	9.64E+08
ZR-95	5.94E+02	1.87E+02	1.29E+02	0.00E+00	2.75E+02	0.00E+00	4.32E+05
SB-124	1.62E+07	2.99E+05	6.34E+06	3.69E+04	0.00E+00	1.42E+07	3.27E+08
I-131	1.41E+08	1.98E+08	1.06E+08	5.76E+10	3.40E+08	0.00E+00	3.91E+07
I-133	1.86E+06	3.15E+06	9.60E+05	4.39E+08	5.52E+06	0.00E+00	2.38E+06
CS-134	4.91E+09	1.16E+10	5.36E+09	0.00E+00	3.67E+09	1.40E+09	1.44E+08
CS-137	6.95E+09	9.24E+09	3.22E+09	0.00E+00	3.15E+09	1.22E+09	1.32E+08
BA-140	1.28E+07	1.57E+04	8.27E+05	0.00E+00	5.33E+03	1.06E+04	1.98E+07
CE-141	1.60E+04	1.07E+04	1.23E+03	0.00E+00	5.03E+03	0.00E+00	3.06E+07
CE-144	1.86E+06	7.68E+05	9.97E+04	0.00E+00	4.59E+05	0.00E+00	4.67E+08

TABLE 4-10

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MILK

PATHWAY - CHILD RECEPTOR

NUCLIDES	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	2.09E+03	2.09E+03	2.09E+03	2.09E+03	2.09E+03	2.09E+03
CR-51	0.00E+00	0.00E+00	2.95E+04	1.64E+04	4.47E+03	2.99E+04	1.56E+06
MN-54	0.00E+00	9.94E+06	2.65E+06	0.00E+00	2.79E+06	0.00E+00	8.34E+06
FE-59	3.92E+07	6.35E+07	3.16E+07	0.00E+00	0.00E+00	1.84E+07	6.61E+07
CO-58	0.00E+00	4.48E+06	1.37E+07	0.00E+00	0.00E+00	0.00E+00	2.61E+07
CO-60	0.00E+00	2.21E+07	6.52E+07	0.00E+00	0.00E+00	0.00E+00	1.23E+08
ZN-65	1.91E+09	5.09E+09	3.17E+09	0.00E+00	3.21E+09	0.00E+00	8.95E+08
SR-89	2.23E+09	0.00E+00	6.38E+07	0.00E+00	0.00E+00	0.00E+00	8.65E+07
SR-90	5.80E+10	0.00E+00	1.47E+10	0.00E+00	0.00E+00	0.00E+00	7.81E+08
ZR-95	1.38E+03	3.03E+02	2.70E+02	0.00E+00	4.34E+02	0.00E+00	3.16E+05
SB-124	3.84E+07	4.99E+05	1.35E+07	8.49E+04	0.00E+00	2.13E+07	2.41E+08
I-131	3.42E+08	3.44E+08	1.96E+08	1.14E+11	5.65E+08	0.00E+00	3.06E+07
I-133	4.51E+06	5.57E+06	2.11E+06	1.04E+09	9.29E+06	0.00E+00	2.25E+06
CS-134	1.13E+10	1.86E+10	3.92E+09	0.00E+00	5.76E+09	2.07E+09	1.00E+08
CS-137	1.67E+10	1.60E+10	2.36E+09	0.00E+00	5.22E+09	1.88E+09	1.00E+08
BA-140	3.10E+07	2.71E+04	1.81E+06	0.00E+00	8.83E+03	1.62E+04	1.57E+07
CE-141	3.94E+04	1.97E+04	2.92E+03	0.00E+00	8.62E+03	0.00E+00	2.45E+07
CE-144	4.57E+06	1.43E+06	2.44E+05	0.00E+00	7.94E+05	0.00E+00	3.74E+08

TABLE 4-11

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MILK

PATHWAY - INFANT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	3.18E+03	3.18E+03	3.18E+03	3.18E+03	3.18E+03	3.18E+03
CR-51	0.00E+00	0.00E+00	4.67E+04	3.05E+04	6.66E+03	5.93E+04	1.36E+06
MN-54	0.00E+00	1.85E+07	4.19E+06	0.00E+00	4.10E+06	0.00E+00	6.79E+06
FE-59	7.32E+07	1.28E+08	5.04E+07	0.00E+00	0.00E+00	3.78E+07	6.11E+07
CO-58	0.00E+00	8.96E+06	2.23E+07	0.00E+00	0.00E+00	0.00E+00	2.23E+07
CO-60	0.00E+00	4.52E+07	1.07E+08	0.00E+00	0.00E+00	0.00E+00	1.07E+08
ZN-65	2.57E+09	8.81E+09	4.06E+09	0.00E+00	4.27E+09	0.00E+00	7.44E+09
SR-89	4.25E+09	0.00E+00	1.22E+08	0.00E+00	0.00E+00	0.00E+00	8.74E+07
SR-90	6.31E+10	0.00E+00	1.61E+10	0.00E+00	0.00E+00	0.00E+00	7.88E+08
ZR-95	2.45E+03	5.97E+02	4.23E+02	0.00E+00	6.43E+02	0.00E+00	2.97E+05
SB-124	7.41E+07	1.09E+06	2.30E+07	1.97E+05	0.00E+00	4.64E+07	2.29E+08
I-131	7.14E+08	8.42E+08	3.70E+08	2.77E+11	9.83E+08	0.00E+00	3.00E+07
I-133	9.52E+06	1.39E+07	4.06E+06	2.52E+09	1.63E+07	0.00E+00	2.35E+06
CS-134	1.82E+10	3.40E+10	3.44E+09	0.00E+00	8.76E+09	3.59E+09	9.24E+07
CS-137	2.67E+10	3.13E+10	2.22E+09	0.00E+00	8.39E+09	3.40E+09	9.78E+07
BA-140	6.37E+07	6.37E+04	3.28E+06	0.00E+00	1.51E+04	3.91E+04	1.57E+07
CE-141	7.81E+04	4.77E+04	5.61E+03	0.00E+00	1.47E+04	0.00E+00	2.46E+07
CE-144	6.55E+06	2.68E+06	3.67E+05	0.00E+00	1.08E+06	0.00E+00	3.76E+08

TABLE 4-12

Ri DOSE CONVERSION FACTORS FOR THE INHALATION

PATHWAY - ADULT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.26E+03	1.26E+03	1.26E+03	1.26E+03	1.26E+03	1.26E+03
CR-51	0.00E+00	0.00E+00	1.00E+02	5.95E+01	2.28E+01	1.44E+04	3.32E+03
MN-54	0.00E+00	3.96E+04	6.30E+03	0.00E+00	9.84E+03	1.40E+06	7.74E+04
FE-59	1.18E+04	2.78E+04	1.06E+04	0.00E+00	0.00E+00	1.02E+06	1.88E+05
CO-58	0.00E+00	1.58E+03	2.07E+03	0.00E+00	0.00E+00	9.28E+05	1.06E+05
CO-60	0.00E+00	1.15E+04	1.48E+04	0.00E+00	0.00E+00	5.97E+06	2.85E+05
ZN-65	3.24E+04	1.03E+05	4.66E+04	0.00E+00	6.90E+04	8.64E+05	5.34E+04
SR-89	3.04E+05	0.00E+00	8.72E+03	0.00E+00	0.00E+00	1.40E+06	3.50E+05
SR-90	9.92E+07	0.00E+00	6.10E+06	0.00E+00	0.00E+00	9.60E+06	7.22E+05
ZR-95	1.07E+05	3.44E+04	2.33E+04	0.00E+00	5.42E+04	1.77E+06	1.50E+05
SB-124	3.12E+04	5.89E+02	1.24E+04	7.55E+01	0.00E+00	2.48E+06	4.06E+05
I-131	2.52E+04	3.58E+04	2.05E+04	1.19E+07	6.13E+04	0.00E+00	6.28E+03
I-133	8.64E+03	1.48E+04	4.52E+03	2.15E+06	2.58E+04	0.00E+00	8.88E+03
CS-134	3.73E+05	8.48E+05	7.28E+05	0.00E+00	2.87E+05	9.76E+04	1.04E+04
CS-137	4.78E+05	6.21E+05	4.28E+05	0.00E+00	2.22E+05	7.52E+04	8.40E+03
BA-140	3.90E+04	4.90E+01	2.57E+03	0.00E+00	1.67E+01	1.27E+06	2.18E+05
CE-141	1.99E+04	1.35E+04	1.53E+03	0.00E+00	6.26E+03	3.62E+05	1.20E+05
CE-144	3.43E+06	1.43E+06	1.84E+05	0.00E+00	8.48E+05	7.78E+06	8.16E+05

TABLE 4-13

Ri DOSE CONVERSION FACTORS FOR THE INHALATION

PATHWAY - TEEN RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.27E+03	1.27E+03	1.27E+03	1.27E+03	1.27E+03	1.27E+03
CR-51	0.00E+00	0.00E+00	1.35E+02	7.50E+01	3.07E+01	2.10E+04	3.00E+03
MN-54	0.00E+00	5.11E+04	8.40E+03	0.00E+00	1.27E+04	1.98E+06	6.68E+04
FE-59	1.59E+04	3.70E+04	1.43E+04	0.00E+00	0.00E+00	1.53E+06	1.78E+05
CO-58	0.00E+00	2.07E+03	2.78E+03	0.00E+00	0.00E+00	1.34E+06	9.52E+04
CO-60	0.00E+00	1.51E+04	1.98E+04	0.00E+00	0.00E+00	8.72E+06	2.59E+05
ZN-65	3.86E+04	1.34E+05	6.24E+04	0.00E+00	8.64E+04	1.24E+06	4.66E+04
SR-89	4.34E+05	0.00E+00	1.25E+04	0.00E+00	0.00E+00	2.42E+06	3.71E+05
SR-90	1.08E+08	0.00E+00	6.68E+06	0.00E+00	0.00E+00	1.65E+07	7.65E+05
ZR-95	1.46E+05	4.58E+04	3.15E+04	0.00E+00	6.74E+04	2.69E+06	1.49E+05
SB-124	4.30E+04	7.94E+02	1.68E+04	9.76E+01	0.00E+00	3.85E+06	3.98E+05
I-131	3.54E+04	4.91E+04	2.64E+04	1.46E+07	8.40E+04	0.00E+00	6.49E+03
I-133	1.22E+04	2.05E+04	6.22E+03	2.92E+06	3.59E+04	0.00E+00	1.03E+04
CS-134	5.02E+05	1.13E+06	5.49E+05	0.00E+00	3.75E+05	1.46E+05	9.76E+03
CS-137	6.70E+05	8.48E+05	3.11E+05	0.00E+00	3.04E+05	1.21E+05	8.48E+03
BA-140	5.47E+04	6.70E+01	3.52E+03	0.00E+00	2.28E+01	2.03E+06	2.29E+05
CE-141	2.84E+04	1.90E+04	2.17E+03	0.00E+00	8.88E+03	6.14E+05	1.26E+05
CE-144	4.89E+06	2.02E+06	2.62E+05	0.00E+00	1.21E+06	1.34E+07	8.64E+05

TABLE 4-14

Ri DOSE CONVERSION FACTORS FOR THE INHALATION

PATHWAY - CHILD RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.12E+03	1.12E+03	1.12E+03	1.12E+03	1.12E+03	1.12E+03
CR-51	0.00E+00	0.00E+00	1.54E+02	8.55E+01	2.43E+01	1.70E+04	1.08E+03
MN-54	0.00E+00	4.29E+04	9.51E+03	0.00E+00	1.00E+04	1.58E+06	2.29E+04
FE-59	2.07E+04	3.34E+04	1.67E+04	0.00E+00	0.00E+00	1.27E+06	7.07E+04
CO-58	0.00E+00	1.77E+03	3.16E+03	0.00E+00	0.00E+00	1.11E+06	3.44E+04
CO-60	0.00E+00	1.31E+04	2.26E+04	0.00E+00	0.00E+00	7.07E+06	9.62E+04
ZN-65	4.26E+04	1.13E+05	7.03E+04	0.00E+00	7.14E+04	9.95E+05	1.63E+04
SR-89	5.99E+05	0.00E+00	1.72E+04	0.00E+00	0.00E+00	2.16E+06	1.67E+05
SR-90	1.01E+08	0.00E+00	6.44E+06	0.00E+00	0.00E+00	1.48E+07	3.43E+05
ZR-95	1.90E+05	4.18E+04	3.70E+04	0.00E+00	5.96E+04	2.23E+06	6.11E+04
SB-124	5.74E+04	7.40E+02	2.00E+04	1.26E+02	0.00E+00	3.24E+06	1.64E+05
I-131	4.81E+04	4.81E+04	2.73E+04	1.62E+07	7.88E+04	0.00E+00	2.84E+03
I-133	1.66E+04	2.03E+04	7.70E+03	3.85E+06	3.38E+04	0.00E+00	5.48E+03
CS-134	6.51E+05	1.01E+06	2.25E+05	0.00E+00	3.30E+05	1.21E+05	3.85E+03
CS-137	9.07E+05	8.25E+05	1.28E+05	0.00E+00	2.82E+05	1.04E+05	3.62E+03
BA-140	7.40E+04	6.48E+01	4.33E+03	0.00E+00	2.11E+01	1.74E+06	1.02E+05
CE-141	3.92E+04	1.95E+04	2.90E+03	0.00E+00	8.55E+03	5.44E+05	5.66E+04
CE-144	6.77E+06	2.12E+06	3.61E+05	0.00E+00	1.17E+06	1.20E+07	3.89E+05

TABLE 4-15

Ri DOSE CONVERSION FACTORS FOR THE INHALATION

PATHWAY - INFANT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	6.47E+02	6.47E+02	6.47E+02	6.47E+02	6.47E+02	6.47E+02
CR-51	0.00E+00	0.00E+00	8.95E+01	5.75E+01	1.32E+01	1.28E+04	3.57E+02
MN-54	0.00E+00	2.53E+04	4.98E+03	0.00E+00	4.98E+03	1.00E+06	7.06E+03
FE-59	1.36E+04	2.35E+04	9.48E+03	0.00E+00	0.00E+00	1.02E+06	2.48E+04
CO-58	0.00E+00	1.22E+03	1.82E+03	0.00E+00	0.00E+00	7.77E+05	1.11E+04
CO-60	0.00E+00	8.02E+03	1.18E+04	0.00E+00	0.00E+00	4.51E+06	3.19E+04
ZN-65	1.93E+04	6.26E+04	3.11E+04	0.00E+00	3.25E+04	6.47E+05	5.14E+04
SR-89	3.98E+05	0.00E+00	1.14E+04	0.00E+00	0.00E+00	2.03E+06	6.40E+04
SR-90	4.09E+07	0.00E+00	2.59E+06	0.00E+00	0.00E+00	1.12E+07	1.31E+05
ZR-95	1.15E+05	2.79E+04	2.03E+04	0.00E+00	3.11E+04	1.75E+06	2.17E+04
SB-124	3.79E+04	5.56E+02	1.20E+04	1.01E+02	0.00E+00	2.65E+06	5.91E+04
I-131	3.79E+04	4.44E+04	1.96E+04	1.48E+07	5.18E+04	0.00E+00	1.06E+03
I-133	1.32E+04	1.92E+04	5.60E+03	3.56E+06	2.24E+04	0.00E+00	2.16E+03
CS-134	3.96E+05	7.03E+05	7.45E+04	0.00E+00	1.90E+05	7.97E+04	1.33E+03
CS-137	5.49E+05	6.12E+05	4.55E+04	0.00E+00	1.72E+05	7.13E+04	1.33E+03
BA-140	5.60E+04	5.60E+01	2.90E+03	0.00E+00	1.34E+01	1.60E+06	3.84E+04
CE-141	2.77E+04	1.67E+04	1.99E+03	0.00E+00	5.25E+03	5.17E+05	2.16E+04
CE-144	3.19E+06	1.21E+06	1.76E+05	0.00E+00	5.38E+05	9.84E+06	1.48E+05

TABLE 4-16

PALO VERDE NUCLEAR GENERATING STATION DISPERSION

AND DEPOSITION PARAMETERS FOR LONG TERM RELEASES

AT THE NEAREST PATHWAY LOCATIONS CENTERED ON UNIT 1

DIRECTION	X/Q (Sec/m^3)	RESIDENCE(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	GARDEN(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	MILK(b) Dist. Miles	D/Q (m^{-2})
N	2.92E-06	1.4	3.25E-09	2.92E-06	1.4	3.25E-09	7.03E-07	(a)	3.48E-10
NNE	1.81E-06	1.8	2.88E-09	4.70E-07	(a)	4.04E-10	4.70E-07	(a)	4.04E-10
NE	1.95E-06	1.9	3.85E-09	1.76E-06	2.1	3.29E-09	5.77E-07	(a)	6.51E-10
ENE	1.03E-06	2.7	1.08E-09	1.03E-06	2.7	1.08E-09	3.86E-07	(a)	2.86E-10
E	9.39E-07	2.8	6.68E-10	3.71E-07	(a)	1.87E-10	3.71E-07	(a)	1.87E-10
ESE	6.37E-07	3.7	2.84E-10	4.12E-07	4.6	1.60E-10	4.12E-07	4.6	1.60E-10 goat
SE	8.83E-07	4.1	2.61E-10	8.83E-07	4.1	2.61E-10	5.84E-07	(a)	1.52E-10
SSE	1.27E-06	4.7	2.61E-10	1.09E-06	(a)	2.15E-10	1.09E-06	(a)	2.15E-10
S	2.58E-06	4.6	4.85E-10	2.09E-06	5.2	3.59E-10	2.13E-06	5.1	3.71E-10 cow
SSW	3.26E-06	3.5	8.26E-10	2.28E-06	(a)	4.53E-10	2.28E-06	(a)	4.53E-10
SW	2.80E-06	2.9	9.10E-10	1.58E-06	(a)	3.56E-10	1.58E-06	(a)	3.56E-10
WSW	1.95E-06	2.6	1.09E-09	8.55E-07	(a)	3.18E-10	8.55E-07	(a)	3.18E-10
W	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10
WNW	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10
NW	8.24E-07	3.8	5.25E-10	7.55E-07	4.1	4.61E-10	6.02E-07	(a)	3.27E-10
NNW	1.46E-06	2.0	1.47E-09	5.20E-07	(a)	3.04E-10	5.20E-07	(a)	3.04E-10

(a) 5-mile value used since there is no pathway located within the sector up to five miles.

(b) Controlling locations are discussed in Appendix A.

References: 1984 Land Use Census (letter ANPM-21221-JRM/LEB). NUS Corporation letters NUS-ANPP-1385 and NUS-ANPP-1386.

TABLE 4-16 (Continued)

PALO VERDE NUCLEAR GENERATING STATION DISPERSION

AND DEPOSITION PARAMETERS FOR LONG TERM RELEASES

AT THE NEAREST PATHWAY LOCATIONS CENTERED ON UNIT 2

DIRECTION	X/Q (Sec/m^3)	RESIDENCE(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	GARDEN(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	MILK(b) Dist. Miles	D/Q (m^{-2})
N	2.73E-06	1.5	2.92E-09	2.39E-06	1.7	2.35E-09	7.03E-07	(a)	3.48E-10
NNE	2.20E-06	1.5	3.87E-09	2.20E-06	1.5	3.87E-09	4.70E-07	(a)	4.04E-10
NE	1.85E-06	2.0	3.55E-09	1.57E-06	2.3	2.78E-09	5.77E-07	(a)	6.51E-10
ENE	1.03E-06	2.7	1.08E-09	1.03E-06	2.7	1.08E-09	3.86E-07	(a)	2.86E-10
E	8.80E-07	3.0	6.06E-10	3.71E-07	(a)	1.87E-10	3.71E-07	(a)	1.87E-10
ESE	6.25E-07	3.7	2.76E-10	3.96E-07	4.7	1.51E-10	3.96E-07	4.7	1.51E-10 goat
SE	9.06E-07	4.0	2.72E-10	9.06E-07	4.0	2.72E-10	5.84E-07	(a)	1.52E-10
SSE	1.34E-06	4.5	2.81E-10	1.09E-06	(a)	2.15E-10	1.09E-06	(a)	2.15E-10
S	2.63E-06	4.5	5.01E-10	2.19E-06	5.0	3.88E-10	2.19E-06	5.0	3.88E-10 cow
SSW	3.48E-06	3.2	9.19E-10	2.28E-06	(a)	4.53E-10	2.28E-06	(a)	4.53E-10
SW	2.93E-06	2.7	9.75E-10	1.58E-06	(a)	3.56E-10	1.58E-06	(a)	3.56E-10
WSW	2.01E-06	2.5	1.16E-09	8.55E-07	(a)	3.18E-10	8.55E-07	(a)	3.18E-10
W	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10
WNW	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10
NW	7.84E-07	4.0	4.88E-10	7.84E-07	4.0	4.88E-10	6.02E-07	(a)	3.27E-10
NNW	1.46E-06	2.0	1.47E-09	5.20E-07	5.0	3.04E-10	5.20E-07	(a)	3.04E-10

(a) 5-mile value used since there is no pathway located within the sector up to five miles.

(b) Controlling locations are discussed in Appendix A.

References: 1984 Land Use Census (letter ANPM-21221-JRM/LEB). NUS Corporation letters NUS-ANPP-1385 and NUS-ANPP-1386.

TABLE 4-16 (Continued)

PALO VERDE NUCLEAR GENERATING STATION DISPERSION

AND DEPOSITION PARAMETERS FOR LONG TERM RELEASES

AT THE NEAREST PATHWAY LOCATIONS CENTERED ON UNIT 3

DIRECTION	X/Q (Sec/m^3)	RESIDENCE(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	GARDEN(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	MILK(b) Dist. Miles	D/Q (m^{-2})
N	2.58E-06	1.8	2.47E-09	2.42E-06	1.9	2.22E-09	7.03E-07	(a)	3.48E-10
NNE	1.85E-06	1.7	2.97E-09	1.85E-06	1.7	2.97E-09	4.70E-07	(a)	4.04E-10
NE	1.66E-06	2.2	3.00E-09	1.48E-06	2.4	2.54E-09	5.77E-07	(a)	6.51E-10
ENE	8.75E-07	2.9	8.86E-10	8.75E-07	2.9	8.86E-10	3.86E-07	(a)	2.86E-10
E	8.90E-07	3.0	6.17E-10	4.06E-07	4.6	2.15E-10	4.25E-07	4.5	2.31E-10 goat
ESE	6.37E-07	3.7	2.84E-10	5.80E-07	4.0	2.46E-10	3.73E-07	(a)	1.37E-10
SE	5.84E-07	(a)	1.52E-10	5.84E-07	(a)	1.52E-10	5.84E-07	(a)	1.52E-10
SSE	1.36E-06	4.4	2.88E-10	1.09E-06	(a)	2.15E-10	1.09E-06	(a)	2.15E-10
S	2.65E-06	4.2	5.25E-10	2.25E-06	4.9	4.06E-10	2.31E-06	4.8	4.21E-10 cow
SSW	3.64E-06	3.1	9.82E-10	2.28E-06	(a)	4.53E-10	2.28E-06	(a)	4.53E-10
SW	3.19E-06	2.5	1.11E-09	1.58E-06	(a)	3.56E-10	1.58E-06	(a)	3.56E-10
WSW	2.12E-06	2.4	1.26E-09	8.55E-07	(a)	3.18E-10	8.55E-07	(a)	3.18E-10
W	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10	7.54E-10	(a)	4.44E-10
WNW	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10
NW	6.83E-07	4.3	4.05E-10	6.82E-07	4.3	4.05E-10	6.02E-07	(a)	3.27E-10
NNW	1.34E-06	2.2	1.26E-09	5.16E-07	5.0	3.01E-10	5.20E-07	(a)	3.04E-10

(a) 5-mile value used since there is no pathway located within the sector up to five miles.

(b) Controlling locations are discussed in Appendix A.

References: 1984 Land Use Census (letter ANPM-21221-JRM/LEB). NUS Corporation letters NUS-ANPP-1385 and NUS-ANPP-1386.

4.4 Requirements: Liquid Effluents

The dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each reactor unit, to areas at and beyond the SITE BOUNDARY (See Figure 6-4) shall be limited:

a. During any calendar quarter to less than or equal to 1.5 mrems to the total body and to less than or equal to 5 mrems to any organ, and

b. During any calendar year to less than or equal to 3 mrems to the total body and to less than or equal to 10 mrems to any organ.

Applicability: At all times.

Action:

With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

4.4.1 Surveillance Requirements:

Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

4.4.2 Implementation of the Requirements:

This Requirement does not require implementation guidance. There are no offsite liquid effluent releases.

5.0 TOTAL DOSE AND DOSE TO PUBLIC ONSITE

5.1 Requirement: Total Dose

The annual (calendar year) dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to direct radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrems to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

Applicability: At all times.

Action:

With the calculated doses from the release of radioactive materials in liquid and gaseous effluents exceeding twice the limits of Section 4.4a, 4.4b, 4.1a, 4.1b, 4.2a or 4.2b calculations shall be made including direct radiation contributions from the reactor units (including outside storage tanks, etc.) to determine whether the above limits of Section 5.1 have been exceeded. If such is the case, prepare and submit to the Commission within 30 days, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10 CFR 20.2203(a)(4), shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report within 30 days is considered a timely request, and a variance is granted until staff action on the request is complete.

5.1.1 Surveillance Requirements:

a. Cumulative dose contributions from the gaseous effluents shall be determined in accordance with the surveillance requirements of Section 4.4.1, 4.1.1 and 4.2.1 and in accordance with the methodology and parameters contained in Section 5.1.2.

b. Cumulative dose contributions from direct radiation from the reactor units and from radwaste storage tanks shall be determined in accordance with the methodology and parameters in Section 5.1.2. This requirement is applicable only under conditions set forth in Section 5.1, Action.

5.1.2 Implementation of the Requirement

Since all other uranium fuel cycle sources are greater than 20 miles away, only the PVNGS site need be considered.

The total dose to any MEMBER OF THE PUBLIC will be determined based on a sum of the doses from all three units' releases and doses from direct radiation from PVNGS.

This dose evaluation is performed annually and submitted with the Annual Radioactive Effluent Release Report to assure compliance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation. NUREG-0543, Methods for Demonstrating LWR Compliance With the EPA Uranium Fuel Cycle Standard (40 CFR Part 190), February 1980, provides a discussion on compliance with 40 CFR Part 190 in relation to the Radiological Environmental Technical Specifications for sites of up to four nuclear power reactors. The NUREG concludes that as long as a nuclear plant site operates at a level below the 10 CFR Part 50, Appendix I reporting requirements, and there is no significant source of direct radiation from the site, no extra analysis is required to demonstrate compliance with 40 CFR Part 190. As a result, this dose evaluation will also be performed whenever calculated doses associated with effluent releases exceed twice the limits of Section 4.4a, 4.4b, 4.1a, 4.1b, 4.2a or 4.2b.

Dose Contribution from Liquid and Gaseous Effluents

The annual whole body dose accumulated by a MEMBER OF THE PUBLIC for the noble gases released in gaseous effluents is determined by using the following equation:

$$D_{WB} = (3.17E\text{-}08)\ \Sigma_i\ [(K_i)\ (X/Q)_{UNIT}\ (Q_i)] \qquad (5\text{-}1)$$

Where:

K_i = the whole body dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

Q_i = the integrated release of radionuclide i, in μCi for the previous calendar year.

$(X/Q)_{UNIT}$ = the highest calculated annual average dispersion parameter, in sec/m^3, for a particular unit, at the controlling location, from Table 4-16, or concurrent meteorological data if available.

=2.92E-06 from Unit 1
=2.19E-06 from Unit 2
=2.31E-06 from Unit 3

D_{WB} = the annual whole body dose in mrem to a MEMBER OF THE PUBLIC at the controlling location due to noble gases released in gaseous effluents.

3.17E-08 = the inverse of seconds in a year (yr/sec).

The annual dose to any organ accumulated by a MEMBER OF THE PUBLIC for iodine-131, iodine-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days released in gaseous effluents is determined by using the following equation:

$$D_o = (3.17E\text{-}08)\ \Sigma_i\ [\Sigma_k(R_{ik}W_k)\ (Q_i)] \qquad (5\text{-}2)$$

Where:

D_o = the total annual organ dose from gaseous effluents to a MEMBER OF THE PUBLIC, in mrem, at the controlling location.

Q_i = the integrated release of radionuclide i, in μCi, for the previous calendar year.

R_{ik} = the dose factor for each identified radionuclide i, for pathway k (for the inhalation pathway in mrem/yr per μCi/m^3 and for the food and ground plane pathways in m^2-mrem/yr per μCi/sec) at the controlling location. The R_{ik}'s for each age group are given in Tables 4-1 through 4-15.

W_K = the highest annual average dispersion or deposition parameter for the particular unit, used for estimating the total annual organ dose to a MEMBER OF THE PUBLIC at the controlling location for the particular unit.

= $(X/Q)_{UNIT}$, in sec/m^3 for the inhalation pathway and for all tritium calculations, for organ dose at the controlling location, from Table 4-16 or concurrent meteorological data if available.

=2.92E-06 from Unit 1
=2.19E-06 from Unit 2
=2.31E-06 from Unit 3

= $(D/Q)_{UNIT}$, in m^{-2}, for the food and ground plane pathways, for organ dose at the controlling location, from Table 4-16 or concurrent meteorological data if available.

=3.25E-09 from Unit 1
=3.88E-10 from Unit 2
=4.21E-10 from Unit 3

3.17E-08 = the inverse of seconds in a year (yr/sec).

Dose Due to Direct Radiation

The component of dose to a MEMBER OF THE PUBLIC due to direct radiation will be evaluated by first determining the direct radiation dose at the site boundary in each sector, and then extrapolating the site boundary dose to the controlling location by the inverse square law of distance.

Dose from Radioactive Liquid and Gaseous Effluents to MEMBERS OF THE PUBLIC due to their activities within the SITE BOUNDARY.

These activities have been determined to be limited to the vicinity of the Energy Information Center (EIC) located inside the SITE BOUNDARY. An assumption was made that no MEMBER OF THE PUBLIC would spend more than eight hours per year at this location. However this calculation has been historically performed assuming an occupancy factor of one, (implying continuous occupancy over the entire year).

A X/Q, determined for the Energy Information Center, will be used for this assessment.

Equations 5-1 and 5-2 in Section 5.1.2 should be used for this assessment.

6.0 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (REMP)

6.1 Requirements: REMP

The radiological environmental monitoring program shall be conducted as specified in Table 6-1, based on locations determined using data from the pre-operational monitoring period; and/or the operational monitoring period indicating a need to make changes in the program.

Applicability: At all times.

Action:

a. With the radiological environmental monitoring program not being conducted as specified in Table 6-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report, as required by Section 7.2, 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 6-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, 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 Section 4.4, 4.1 and 4.2. When more than one of the radionuclides in Table 6-2 are detected in the sampling medium, this report shall be submitted if:

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

When radionuclides other than those in Table 6-2 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 is equal to or greater than the calendar year limits of Section 4.4, 4.1 and 4.2. 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.

c. With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 6-1, identify locations for obtaining replacement samples and add them to the Radiological Environmental Monitoring Program within 30 days. The specific locations from which samples were unavailable may then be deleted from the monitoring program. Pursuant to Section 7.1, Annual Radioactive Effluent Release Report, identify the cause of the unavailability of samples and identify the new location(s) for obtaining replacement samples in the next Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

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

6.1.1 Surveillance Requirements:

a. The radiological environmental monitoring samples shall be collected pursuant to Table 6-1 from the specific locations given in Table 6-4 and Figures 6-1 and 6-2 and shall be analyzed pursuant to the requirements of Table 6-1, and the detection capabilities required by Table 6-3.

6.1.2 Implementation of the Requirements: REMP

The results of the radiological environmental monitoring program are intended to supplement the results of the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected based on 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 to individuals resulting from station operation.

This requirement is implemented by Nuclear Administrative and Technical Manual procedures.

TABLE 6-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations[a]	Sampling and Collection Frequency[a]	Type and Frequency of Analysis[d]
Airborne Radioiodine and particulates	Samples from 5 locations: 4 samples at or near the SITE BOUNDARIES (#14A, 15, 29, 40) including 3 different sectors of the highest calculated annual average ground level D/Q.* 1 sample (#40) from areas of special interest, which is from the vicinity of a community having the highest calculated annual average D/Q. 1 sample (#6A) from a control location 15-30 km (10-20 mi) distant and in the least prevalent wind direction.[c]	Continuous sampling collected weekly, or more frequently if required by dust loading.	Gross beta weekly[c], I-131 weekly; gamma isotopic analysis of composite (by location) quarterly.
Direct radiation[b]	Forty (40) routine monitoring stations (#6-42, #44, #46, #50) either with two or more dosimeters or with one instrument for measuring and recording dose rate continuously, placed as follows: An inner ring of stations, one in each meteorological sector in the general area of the site boundary (16 locations); An outer ring of stations, one in each meteorological sector in the 6-8 km (4-5 mi) range from the site (16 locations); and The balance of the stations (8 locations) 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.	Quarterly	Gamma dose quarterly.

* D/Q refers to average annual relative ground deposition rate.

TABLE 6-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations[a]	Sampling and Collection Frequency[a]	Type and Frequency of Analysis[d]
<u>Waterborne</u>			
Surface	Water storage reservoir (#60) Evaporation pond #1 (#59) Evaporation pond #2 (#63)	Monthly composite of weekly grab sample.	Gamma isotopic analysis monthly; tritium quarterly.
Ground	2 onsite wells[f] (#57, #58)	Quarterly grab sample	Tritium and gamma isotopic analysis quarterly.
Drinking (well)	3 wells from surrounding residences (#46, #48, #49) that would be affected by its discharge.	Composite sample of weekly grab samples over 2-week period when I-131 analysis is performed, monthly composite of weekly grab samples otherwise	I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year.[g] Composite for gross beta and gamma isotopic analyses monthly. Composite for tritium analysis quarterly.
<u>Ingestion</u> Milk	Samples from milking animals in 3 locations within 5 km distance having the highest dose potential. If there are none, 1 sample from milking animals in each of three areas between 5 and 8 km (3-5 mi) distant where doses are calculated to be greater than 1 mrem per year.[g] One sample from milking animals at a control location 15 to 30 km (10-20 mi) distant and in the least prevalent wind direction.[c]	Semimonthly for animals on pasture; otherwise, monthly.	Gamma isotopic and I-131 analysis semimonthly when animals are on pasture or monthly at other times.

TABLE 6-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations[a]	Sampling and Collection Frequency[a]	Type and Frequency of Analysis[d]
Food Products *	2 samples (#47, #52) of 3 types of broad leaf vegetation (as available) from locations identified per the criteria of Section 6.2b. of this manual.	Monthly during growing season.	Gamma isotopic analysis.
	1 control sample (#62) of 3 types of broad leaf vegetation (as available) grown 15 to 30 km (10-20 mi) distant in the least prevalent wind direction.[c]	Monthly during growing season.	Gamma isotopic analysis.

* When broad leaf vegetation samples are not available, reports from 4 existing supplemental airborne radioiodine sample locations will be substituted.

Table 6-1 (Continued)

TABLE NOTATION

a The number, media, frequency, and location of sampling may vary from site to site. It is recognized that, at times, it may not be possible or practical 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. Actual locations (distance and direction) from the site shall be provided in Table 6-4 and Figures 6-1 or 6-2 in the ODCM. Refer to Regulatory Guide 4.1, "Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants."

b Regulatory Guide 4.13 provides guidance for thermoluminescence dosimetry (TLD) systems used for environmental monitoring. 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 may be considered to be one phosphor, and two or more phosphors in a packet may be considered as two or more dosimeters. Film badges should not be used for measuring direct radiation.

c Particulate sample filters shall be analyzed for gross beta 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air or water is greater than 10 times the yearly mean of control samples for any medium, gamma isotopic analysis should be performed on the individual samples.

d Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.

e The purpose of this sample is to obtain background information. If it is not practical to establish control locations in accordance with the wind direction and distance criteria, other sites that provide valid background data may be substituted.

f Groundwater samples should 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.

g The dose shall be calculated for the maximum organ and age group, using the methodology and parameters in the ODCM.

TABLE 6-2

REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES

Analysis	Water (pCi/l)	Airborne Particulate or Gas (pCi/m^3)	Fresh Milk (pCi/l)	Food Products (pCi/kg, wet)
H-3	20,000 *			
Mn-54	1,000			
Fe-59	400			
Co-58	1,000			
Co-60	300			
Zn-65	300			
Zr-Nb-95	400			
I-131	2 **	0.9	3	100
Cs-134	30	10	60	1,000
Cs-137	50	20	70	2,000
Ba-La-140	200		300	

* For drinking water samples. This is a 40 CFR 141 value. If no drinking water pathway exists, a value of 30,000 pCi/l may be used.

** If no drinking water pathway exists, a reporting level of 20 pCi/l may be used.

TABLE 6-3

DETECTION CAPABILITIES FOR ENVIRONMENTAL ANALYSIS[a]

Lower Limit of Detection (LLD)[b]				
Analysis	Water (pCi/l)	Airborne Particulate or Gas (pCi/m^3)	Fresh Milk (pCi/l)	Food Products (pCi/kg, wet)
Gross Beta	4	0.01		
H-3	2000*			
Mn-54	15			
Fe-59	30			
Co-58, -60	15			
Zn-65	30			
Zr-95	30			
Nb-95	15			
I-131	1**	0.07	1	60
Cs-134	15	0.05	15	60
Cs-137	18	0.06	18	80
Ba-140	60		60	
La-140	15		15	

NOTE: This list does not mean that only these nuclides are to be detected and reported. Other peaks that are measurable and identifiable, together with the above nuclides, shall also be identified and reported.

* If no drinking water pathway exists, a value of 3000 pCi/l may be used.

** If no drinking water pathway exists, a value of 15 pCi/l may be used.

Table 6-3 (Continued)

TABLE NOTATION

a Guidance for detection capabilities for thermoluminescent dosimeters used for environmental measurements is given in Regulatory Guide 4.13.

b Table 6-3 indicates acceptable detection capabilities for radioactive materials in environmental samples. These detection capabilities are tabulated in terms of the lower limits of detection (LLDs). The LLD is defined, for purposes of this guide, 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):

$$LLD = \frac{4.66 s_b}{E * V * 2.22 * Y * \exp(-\lambda \Delta t)}$$

Where:

LLD is the a priori lower limit of detection as defined above (as pCi per unit mass or volume),

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

E is the counting efficiency (as counts per disintegration),

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

2.22 is the number of disintegrations per minute per picocurie,

Y is the fractional radiochemical yield (when applicable),

λ is the radioactive decay constant for the particular radionuclide, and

Δt for environmental samples is the elapsed time between sample collection (or end of the sample collection period) and time of counting.

In calculating the LLD for a radionuclide determined by gamma-ray spectrometry the background should include the typical contributions of other radionuclides normally present in the samples (e.g., potassium-40 in milk samples). Typical values of E, V, Y, and Δt 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. 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.

6.2 Requirement: Land Use Census

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^2 (500 ft^2) 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 Section 4.2.1, identify the new location(s) in the next Annual Radioactive Effluent Release Report, pursuant to Section 7.1.

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 Section 6.1, add the new location(s) to the radiological environmental monitoring program within 30 days. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may then be deleted from the monitoring program. Pursuant to Section 7.1, identify the new location(s) in the next Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

6.2.1 Surveillance Requirements:

a. The land use census shall be conducted during the growing season annually 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 Section 7.2.

6.2.2 Implementation of the Requirements:

The above Requirement is implemented by Nuclear Administrative and Technical Manual procedures.

* 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. Specifications for broad leaf vegetation sampling in Table 6-1 shall be followed, including analysis of control samples.

6.3 Requirements: Interlaboratory Comparison Program

Analyses shall be performed on radioactive materials supplied as part of an Interlaboratory Comparison Program that correspond to samples required by Table 6-1, as applicable.

Applicability: At all times.

Action:

a. With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Section 7.2.

6.3.1 Surveillance Requirements:

a. A summary of the results obtained as part of the above required Interlaboratory Comparison Program and in accordance with the methodology and parameters in this manual shall be included in the Annual Radiological Environmental Operating Report pursuant to Section 7.2.

6.3.2 Implementation of the Requirements:

PVNGS laboratories or contract laboratories which perform analyses for the Radiological Environmental Monitoring Program (REMP) participate in an Interlaboratory Comparison Program. The participation includes all of the determinations (sample medium-radionuclide combinations) that are included in the monitoring program.

If deviation from specified limits is identified an investigation is made to determine the reason for the deviation and corrective actions are taken as necessary. The results of all analyses made under this program are included in the Annual Radiological Environmental Operating Report.

TABLE 6-4

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE COLLECTION LOCATIONS

SAMPLE SITE	SAMPLE TYPE	NOTE (d)	LOCATION DESIGNATION (a)	LOCATION DESCRIPTION (c)
1	TLD	SUP	E30	APS Western Division Office, Goodyear
1	Air	Deleted		
2	TLD	SUP	ENE24	Scott-Libby School, Perryville and Thomas Rds.
3	TLD	SUP	E21	Liberty School, 19800 W. Hwy 85
4	TLD	SUP	E16	APS Buckeye Office, 615 N. 4th St., Buckeye
4	Air	SUP	E16	Same as TLD
5	TLD	SUP	ESE11	Palo Verde School, Palo Verde Rd. (291st Ave.) and Old US 80
6	TLD (b)	Control	SSE31	APS Gila Bend substation, frontage road W of town
6A	Air (b)	Control	SSE13	Old US 80, Gila Bend side of Gillespie Bridge
7	TLD (b)	SP	SE7	Old US 80 and Arlington School Rd.
7A	Air	SUP	SE8	Arlington School, 16351 S. Arlington School Rd.
8	TLD (b)	OR	SSE4	Southern Pacific Pipeline Rd., 1.4 miles SW of 355th Ave.
9	TLD (b)	OR	S5	Southern Pacific Pipeline Rd., 2.5 miles SW of 355th Ave.
10	TLD (b)	OR	SE5	SE corner of 355th Ave. and Elliot Rd.
11	TLD (b)	OR	ESE5	NW corner of 339th Ave. and Dobbins Rd.
12	TLD (b)	OR	E5	NE corner of 339th Ave. and Buckeye-Salome Rd.
13	TLD (b)	IR	N1	N site boundary
14	TLD (b)	IR	NNE2	NNE site boundary
14A	Air (b)		NNE2	SW corner of 371st Ave. and Buckeye-Salome Rd.
15	TLD (b)	IR	NE2	NE site boundary, WRF access road
15	Air (b)		NE2	Same as TLD
16	TLD (b)	IR	ENE2	ENE site boundary
17	TLD (b)	IR	E2	E site boundary
17A	Air	SUP	E4	351st Ave., 1 mile S of Buckeye-Salome Rd.
18	TLD (b)	IR	ESE2	ESE site boundary

TABLE 6-4

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE COLLECTION LOCATIONS

SAMPLE SITE	SAMPLE TYPE	NOTE (d)	LOCATION DESIGNATION (a)	LOCATION DESCRIPTION (c)
19	TLD (b)	IR	SE2	SE site boundary
20	TLD (b)	IR	SSE2	SSE site boundary
21	TLD (b)	IR	S3	S site boundary
21	Air	SUP	S3	Same as TLD
22	TLD (b)	IR	SSW3	SSW site boundary
23	TLD (b)	OR	W5	2 miles N of Elliot Rd., 3 miles W of Wintersburg Rd.
24	TLD (b)	OR	SW4	Elliot Rd., 2 miles W of Wintersburg Rd.
25	TLD (b)	OR	WSW5	Elliot Rd., 3 miles W of Wintersburg Rd. at cattleguard
26	TLD (b)	OR	SSW4	Sheppard farm, 13202 S. 383rd Ave., 0.5 miles W of house
27	TLD (b)	IR	SW1	SW site boundary
28	TLD (b)	IR	WSW1	WSW site boundary
29	TLD (b)	IR	W1	W site boundary
29	Air (b)		W1	Same as TLD
30	TLD (b)	IR	WNW1	WNW site boundary
31	TLD (b)	IR	NW1	NW site boundary
32	TLD (b)	IR	NNW1	NNW site boundary
33	TLD (b)	OR	NW4	Buckeye Rd., 0.5 miles W of 395th Ave.
34	TLD (b)	OR	NNW5	SE corner of 395th Ave. and Van Buren St.
35	TLD (b)	SP	NNW8	Fire Station, 40901 W. Osborn Rd., Tonopah
35	Air	SUP	NNW8	Same as TLD
36	TLD (b)	OR	N5	SW corner of Wintersburg Rd. and Van Buren St.
37	TLD (b)	OR	NNE5	SE corner of 363rd Ave. and Van Buren St.
38	TLD (b)	OR	NE5	SW corner of 355th Ave. and Buckeye Rd.
39	TLD (b)	OR	ENE5	343rd Ave., 0.5 miles S of Lower Buckeye Rd.
40	TLD (b)	SP	N3	Wintersburg, Transmission Rd. S of trailer park

TABLE 6-4

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE COLLECTION LOCATIONS

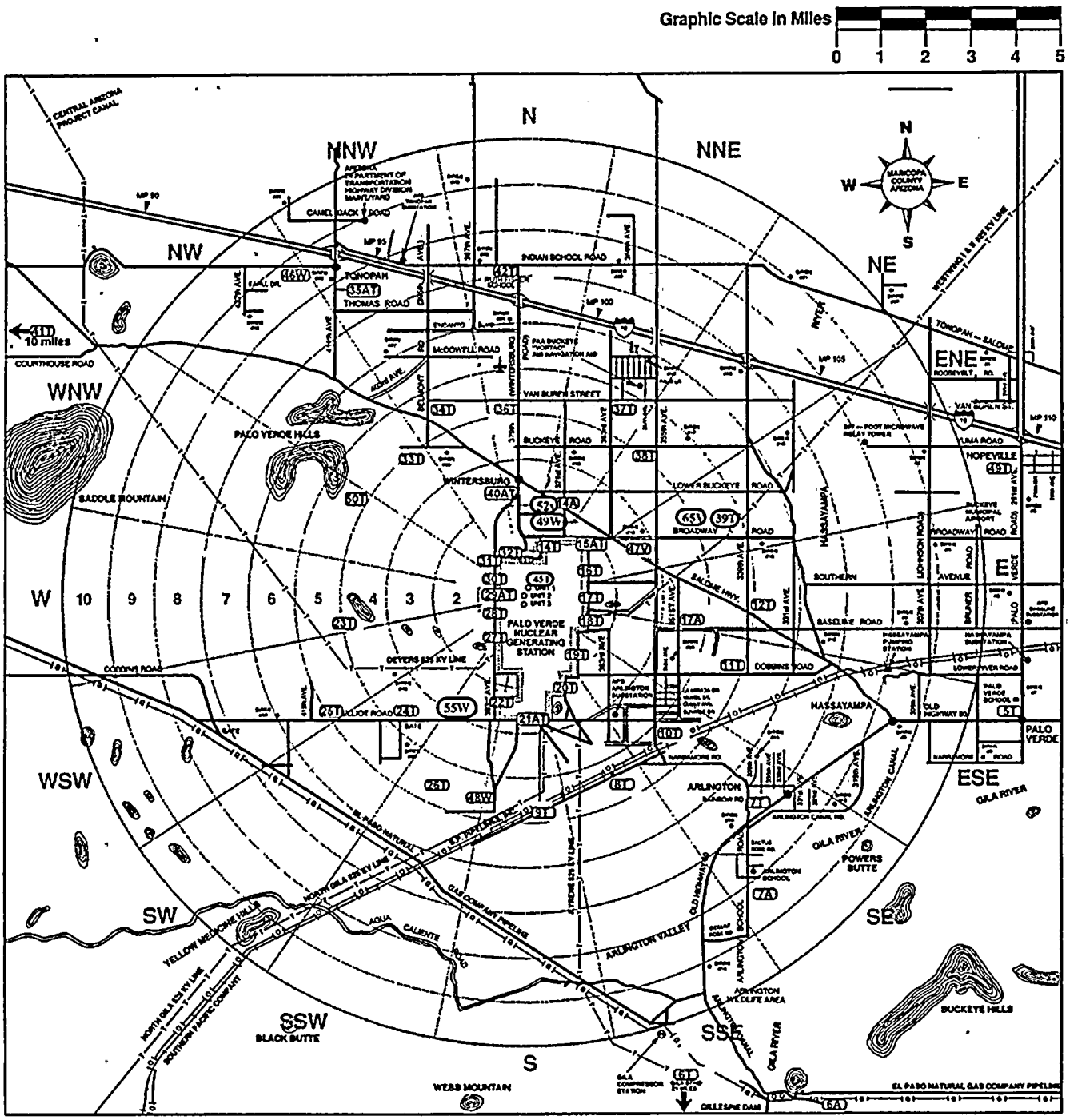
SAMPLE SITE	SAMPLE TYPE	NOTE (d)	LOCATION DESIGNATION (a)	LOCATION DESCRIPTION (c)
40	Air (b)		N3	Same as TLD
41	TLD (b)	SP	WNW20	Harquahala Valley School; Van Buren St., 1 mile W of Steve Martori Dr.
42	TLD (b)	SP	N8	Ruth Fisher School, Indian School and Wintersburg Rds.
43	DELETED			
44	TLD (b)	Control	ENE35	APS El Mirage Office, 12313 W. Grand Ave.
45	TLD	SUP Transit Control	ONSITE	Central lab, lead pig
46	TLD (b)	SP	ENE30	Litchfield Park School, 13825 W. Indian School Rd.
46	Water (b)	WD	NW9	McArthur residence, 41701 W. Indian School Rd., Tonopah
47	TLD	SUP	E35	Littleton School, 115th Ave. and Hwy 85, Cashion
47	Vegetation (b)		ENE3	Adams' residence, NW corner of 355th Ave. and Buckeye-Salome Rd.
48	TLD	SUP	E24	Jackrabbit Trail, S of I-10, N of Filmore St.
48	Water (b)	WD	SSW4	Sheppard farm, 13202 S. 383rd Ave.
49	TLD	SUP	ENE11	Palo Verde Rd., 0.25 miles S of I-10
49	Water (b)	WD	N2	Chowanec residence, 375th Ave., 0.5 miles S of Buckeye-Salome Rd.
50	TLD (b)	OR	WNW5	3.5 miles W of Wintersburg Rd., 2 miles S of Buckeye-Salome Rd.
50	Milk	Deleted		
51	Milk			
52	Vegetation (b)		NNE2	Payne residence, 3515 S. 375th Ave.
53	Milk	Deleted		
54	Milk			
55	Water	WD SUP	SW3	Gavette residence, 39326 W. Elliot Rd.

TABLE 6-4

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE COLLECTION LOCATIONS

SAMPLE SITE	SAMPLE TYPE	NOTE (d)	LOCATION DESIGNATION (a)	LOCATION DESCRIPTION (c)
56	Milk	Deleted		
57	Ground Water (b)	WG	onsite	Well 27ddc
58	Ground Water (b)	WG	onsite	Well 34abb
59	Surface Water (b)	WS	onsite	Evaporation Pond #1
60	Surface Water (b)	WS	onsite	Reservoir
62	Vegetation (b)	Control	E35	Tolleson Produce Co., 91st Ave. and Van Buren St.
63	Surface Water (b)	WS	onsite	Evaporation Pond #2
64				Deleted
65	Vegetation	SUP	ENE4	Hommel residence, 35026 W. Broadway Rd.

NOTES: (a) Distance and direction are relative to the Unit 2 containment, rounded to the nearest mile.
(b) These samples fulfill the requirements of the ODCM, Table 6-1.
(c) Refer to Figures 6-1 and 6-2 for relative locations of sample sites.
(d) IR - inner ring
OR - outer ring
SP - school or population center
WS - waterborne surface
WG - waterborne ground
WD - waterborne drinking
SUP -designated supplemental sampling location



KEY TO MAP

- Paved Road
- Unpaved Road
- 4WD Road
- Gas Pipeline
- Oil Pipeline
- Power Line
- Railroad
- Airstrip
- School
- Siren
- MP Milepost
- Palo Verde Nuclear Generating Station Boundary
- T Thermoluminescent Dosimeters (TLD)
- A Air Sample
- V Vegetation Sample
- W Water Sample
- (1) Sample Sites

Palo Verde Nuclear Generating Station

Radiological Environmental Monitoring Program Sample Sites

0 – 10 Miles

Figure 6-1

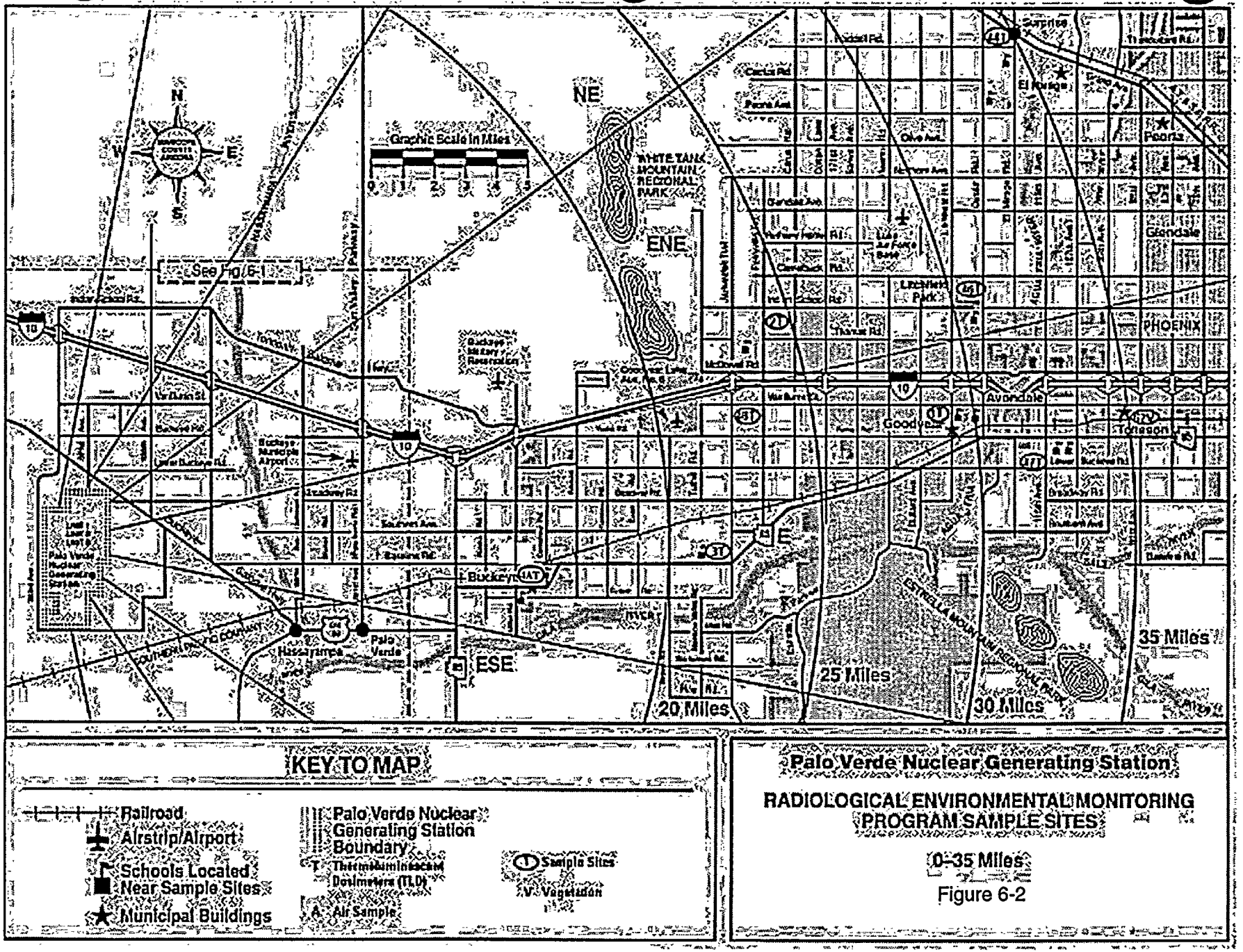

N
NE
E
SE
S
SSE
SSW
SW
WSW
W
WNW
NNW
ENE
ESE
Graphic Scale in Miles
0 1 2 3 4 5
See Fig 6-1
WHITE TANK MOUNTAIN REGIONAL PARK
Buckeye Municipal Airport
Palo Verde Nuclear Generating Station
Hassayampa
Palo Verde
Buckeye
Goodyear
Avondale
Glendale
Peoria
El Mirage
Litchfield Park
PHOENIX
Tolleson
ESTRELLA MOUNTAIN REGIONAL PARK
20 Miles
25 Miles
30 Miles
35 Miles
KEY TO MAP
Railroad
Airstrip/Airport
Schools Located Near Sample Sites
Municipal Buildings
Palo Verde Nuclear Generating Station Boundary
Thermoluminescent Dosimeters (TLD)
Air Sample
Sample Sites
V Vegetation
Palo Verde Nuclear Generating Station
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM SAMPLE SITES
0-35 Miles
Figure 6-2

FIGURE 6-3 DELETED

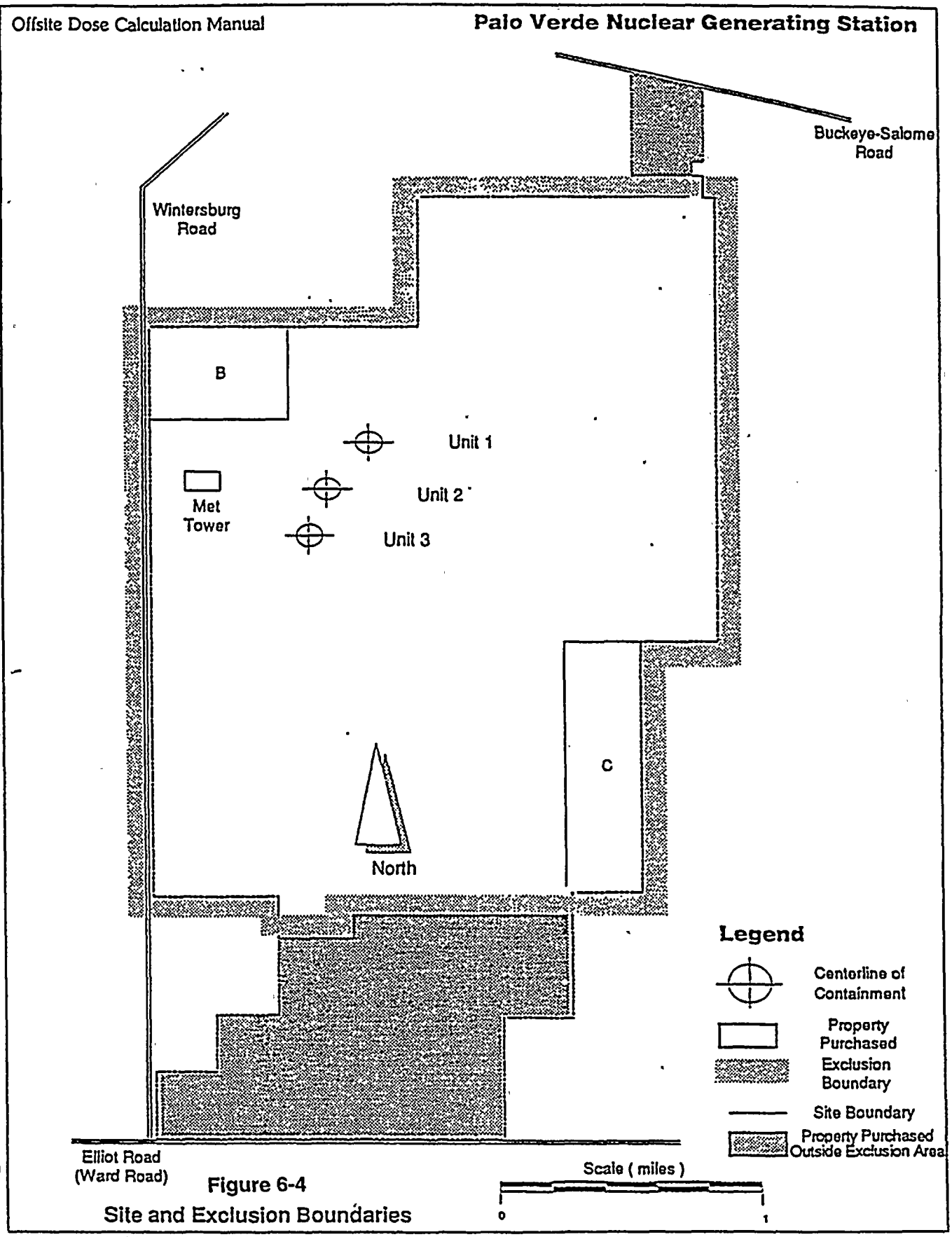
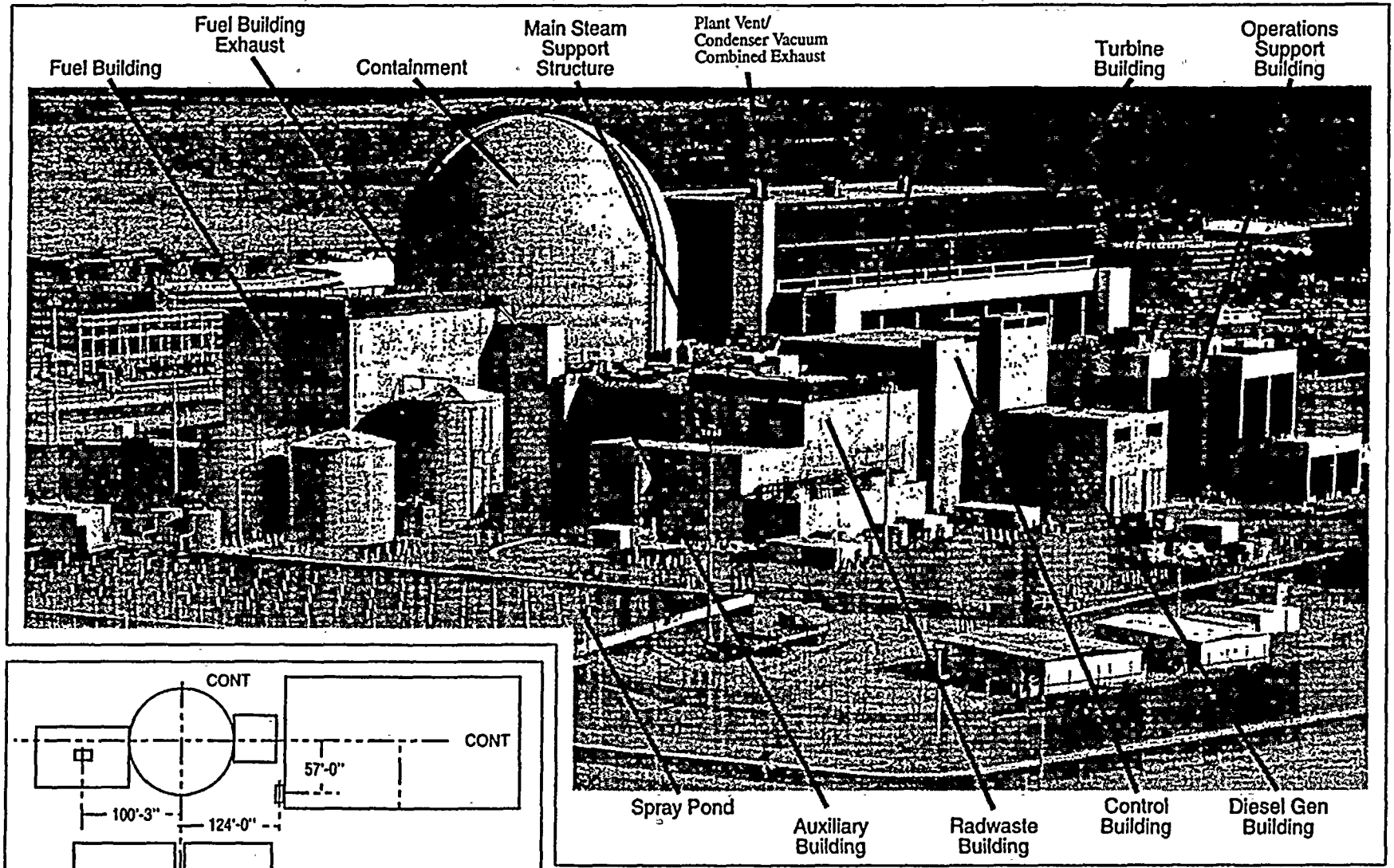


Figure 6-4

Site and Exclusion Boundaries

Palo Verde Nuclear Generating Station



Elevation of Exhaust Point Above Grade	
Plant Vent/Condenser Vacuum	145'
Fuel Building	109'-9"

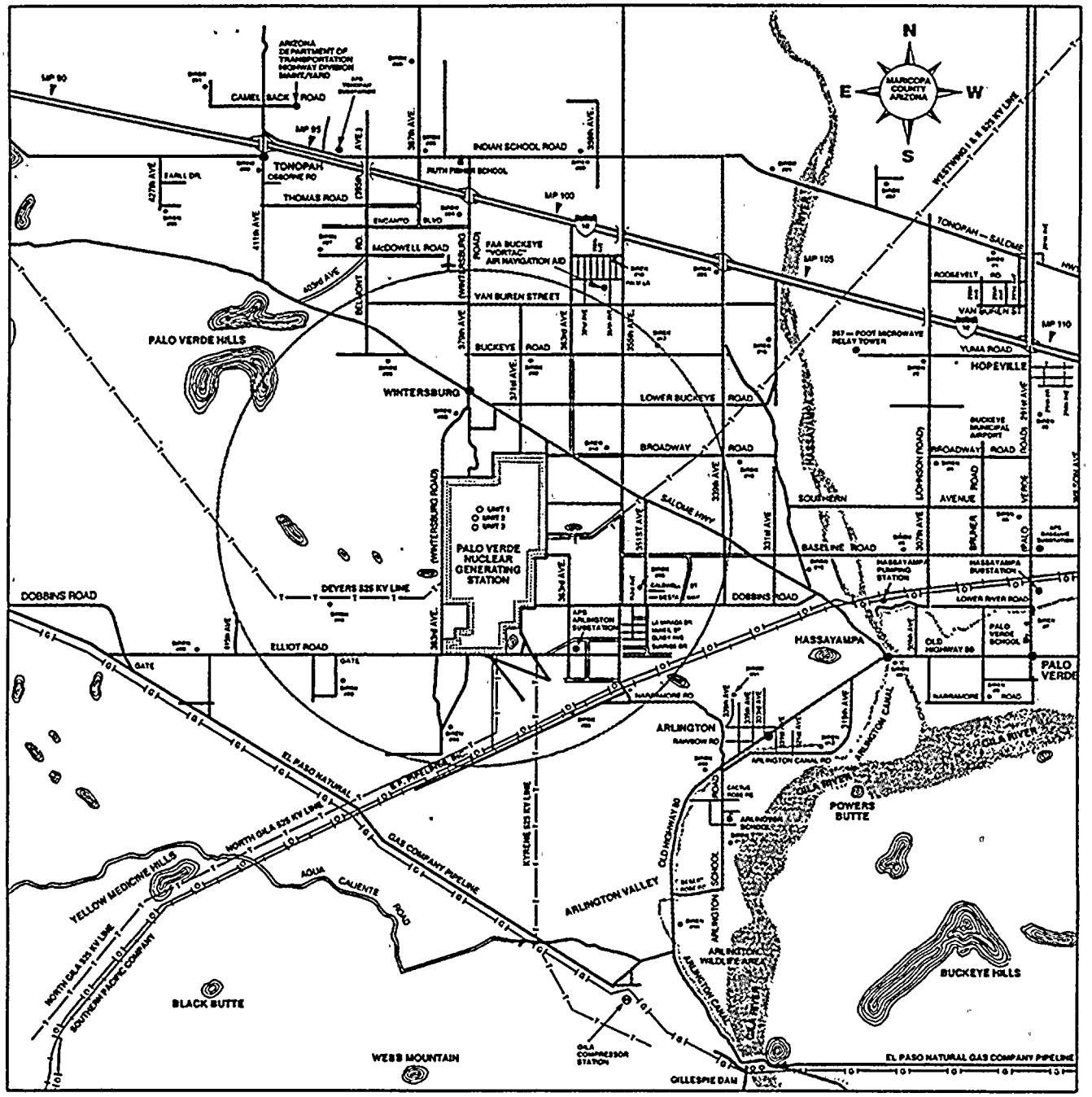
Palo Verde Nuclear Generating Station
GASEOUS EFFLUENT RELEASE POINTS

Fig. 6-5

Palo Verde Nuclear Generating Station

Graphic Scale in Miles

0 1 2 3 4 5



KEY TO MAP

- Paved Road
- Unpaved Road
- 4WD Road
- Gas Pipeline
- Oil Pipeline
- Power Line
- Railroad
- Airstrip
- Palo Verde Nuclear Generating Station Boundary
- School
- Siren
- MP Milepost

Palo Verde Nuclear Generating Station
LOW POPULATION ZONE

0–5 Miles

Figure 6-6

7.0 RADIOLOGICAL REPORTS

7.1 Requirement: Annual Radioactive Effluent Release Report *

Routine Annual Radioactive Effluent Release Reports covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year.

The Annual Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The Annual Radioactive Effluent Release Report shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability**. This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year. This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY (Figure 6-4) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM.

The Annual Radioactive Effluent Release Report shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contributions are given Section 5.0 and Regulatory Guide 1.109 Rev. 1, October 1977.

* A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

** In lieu of submission with the Annual Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.

The Annual Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

a. Container volume,

b. Total curie quantity (specify whether determined by measurement or estimate),

c. Principal radionuclides (specify whether determined by measurement or estimate),

d. Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),

e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and

f. Solidification agent or absorbent (e.g., cement, urea formaldehyde).

The Annual Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Annual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM and to the OFFSITE DOSE CALCULATION MANUAL, as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Section 6.2.

7.2. Requirement: Annual Radiological Environmental Operating Report *

Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological environmental surveillance activities for the report period, including a comparison with preoperational studies, with operational controls as appropriate, and with previous environmental surveillance reports, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Section 6.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in Table 6-4 and Figures 6-1 and 6-2 as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Section 6.3; discussion of all deviations from the sampling schedule of Table 6-1; and discussion of all analyses in which the LLD required by Table 6-3 was not achievable.

* A single submittal may be made for a multiple unit station.

** One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.

APPENDIX A
DETERMINATION OF CONTROLLING LOCATION

The controlling location is the location of the MEMBER OF THE PUBLIC who receives the highest doses.

The determination of a controlling location for implementation of 10CFR50 for radioiodines and particulates is known to be a function of:

(1) Isotopic release rates

(2) Meteorology

(3) Exposure pathway

(4) Receptor's age

The incorporation of these parameters into Equation 5-2 results in the respective equations at the controlling location. The isotopic release rates are based upon the source terms calculated using the PVNGS Environmental Report, Operating License Stage, Table 3.5-12, without carbon.

All of the locations and exposure pathways, identified in the 1984 Land Use Census, have been evaluated. These include cow milk ingestion, goat milk ingestion, vegetable ingestion, inhalation, and ground plane exposure. An infant is assumed to be present at all milk pathway locations. A child is assumed to be present at all vegetable garden locations. The ground plane exposure pathway is only considered to be present where an infant is not present. Naturally, inhalation is present everywhere an individual is present.

For the determination of the controlling locations, the highest X/Q and D/Q values, based on the 9 year meteorological data base, for the vegetable garden, cow milk, and goat milk pathways, are selected for each unit. The receptor organ doses have been calculated at each of these locations. Based upon these calculations, it is determined that the controlling receptor pathway is a function of unit location. For Unit 1, the controlling receptor is a garden-child pathway; for releases from Unit 2 and Unit 3 the controlling receptor is a cow milk-infant pathway. These determinations are based upon Table 4-16 which, in turn, is based upon the 1984 Land Use Census. Locations of the nearest residences, gardens and milk animals, as determined in the 1984 Land Use Census, are given in Table 4-16.

APPENDIX B
BASES FOR REQUIREMENTS

B-2.1 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The alarm/trip setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63, 64 of Appendix A to 10 CFR PART 50.

There are two separate radioactive gaseous effluent monitoring systems: the low range effluent monitors for normal plant radioactive gaseous effluents and the high range effluent monitors for post-accident plant radioactive gaseous effluents. The low range monitors operate at all times until the concentration of radioactivity in the effluent becomes too high during post-accident conditions. The high range monitors only operate when the concentration of radioactivity in the effluent is above the setpoint in the low range monitors.

B-3.1 GASEOUS EFFLUENT - DOSE RATE

This requirement provides reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC in an UNRESTRICTED AREA, either at or beyond the SITE BOUNDARY, in excess of the design objectives of Appendix I to 10 CFR part 50. This requirement is provided to ensure that gaseous effluents from all units on the site will be appropriately controlled. It provides operational flexibility for releasing gaseous effluents to satisfy the Section II.A and II.C design objectives of Appendix I to 10 CFR part 50. For MEMBERS OF THE PUBLIC who may at times be within the SITE BOUNDARY, the occupancy of that MEMBER OF THE PUBLIC will usually be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the SITE BOUNDARY. Examples of calculations for such MEMBERS OF THE PUBLIC, with the appropriate occupancy factors, shall be given in the ODCM. The specified release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to a MEMBER OF THE PUBLIC at or beyond the SITE BOUNDARY to less than or equal to 500 mrems/year to the total body or to less than or equal to 3000 mrems/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mrems/year. This requirement does not affect the requirement to comply with the annual limitations of 10 CFR 20.1301(a).

This requirement applies to the release of radioactive materials in gaseous effluents from all reactor units at the site.

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of the lower limits of detection (LLD). 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 (revised annually).

B-3.2 SECONDARY SYSTEM LIQUID WASTE DISCHARGE TO ONSITE EVAPORATION PONDS - CONCENTRATION

This requirement is provided to ensure that the annual total effective dose equivalent to individual members of the public from the licensed operation does not exceed the requirements of 10 CFR Part 20, due to the accumulated activity in the evaporation ponds from the secondary system discharges.

Restricting the concentrations of the secondary liquid wastes discharged to the onsite evaporation ponds will restrict the quantity of radioactive material that can accumulate in the ponds. This, in turn, provides assurance that in the event of an uncontrolled release of the pond's contents to an UNRESTRICTED AREA, the resulting total effective dose equivalent to individual members of the public at the nearest exclusion area boundary will not exceed the requirements of 10 CFR Part 20.

This requirement applies to the secondary system liquid waste discharges of radioactive materials from all reactor units to the onsite evaporation ponds.

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of the lower limits of detection (LLD). 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 (revised annually).

B-4.1 GASEOUS EFFLUENT - DOSE, Noble Gases

This requirement is provided to implement Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. This requirement implements the guides set forth in Section II.B of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." The surveillance requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The dose calculation methodology and parameters established in the ODCM for calculating the doses due to the actual release rates of radioactive noble gases in gaseous effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors," Revision 1, July 1977. The ODCM equations provided for determining the air doses at and beyond the SITE BOUNDARY are based upon the historical average atmospheric conditions.

This requirement applies to the release of radioactive materials in gaseous effluents from each reactor unit at the site.

B-4.2 GASEOUS EFFLUENT - DOSE - Iodine-131, Iodine-133, Tritium, and All Radionuclides in Particulate Form With Half-Lives Greater Than 8 Days

This requirement is provided to implement the requirements of Sections II.C, III.A, IV.A of Appendix I, 10 CFR Part 50. This requirement is the guide set forth in Section II.C of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive materials in gaseous effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." The ODCM calculational methods specified in the surveillance requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases for Light-Water-Cooled Reactors," Revision 1, July 1977. These equations also provide for determining the actual doses based upon the historical average atmospheric conditions. The release rate specifications for iodine-131, iodine-133, tritium, and radionuclides in particulate form with half-lives greater than 8 days are dependent upon the existing radionuclide pathways to man, in the areas at and beyond the SITE BOUNDARY. The pathways that were examined in the development of these calculations were: (1) individual inhalation of airborne radionuclides, (2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, (3) deposition onto grassy areas where milk animals and meat-producing animals graze with consumption of the milk and meat by man, and (4) deposition on the ground with subsequent exposure of man.

This requirement applies to the release of radioactive materials in gaseous effluents from each reactor unit at the site.

B-4.3 GASEOUS RADWASTE TREATMENT

The OPERABILITY of the GASEOUS RADWASTE SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM ensures that the systems will be available for use whenever gaseous effluents require treatment prior to release to the environment. The requirement that the appropriate portions of these systems be used, when specified, provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as reasonably achievable." This requirement implements the requirements of 10 CFR 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50, and the design objectives given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the systems were specified as a suitable fraction of the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

This requirement applies to the release of radioactive materials in gaseous effluents from each reactor unit at the site.

The minimum analysis frequency of 4/M (i.e., at least 4 times per month at intervals no greater than 9 days and a minimum of 48 times a year) is used for certain radioactive gaseous waste sampling in Table 3-1. This will eliminate taking double samples when quarterly and weekly samples are required at the same time.

B-4.4 SECONDARY SYSTEM LIQUID WASTE DISCHARGE TO ONSITE EVAPORATION PONDS - DOSE

This requirement is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10 CFR Part 50. This requirement implements the guides set forth in Section II.A of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in liquid effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." Also, for fresh water sites with drinking water supplies that can be potentially affected by plant operations, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess of the requirements of 40 CFR Part 141. The dose calculation methodology and parameters in the ODCM implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April 1977.

This requirement applies to the release of liquid effluents from each reactor at the site. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

B-5.1 TOTAL DOSE AND DOSE TO PUBLIC ONSITE

This requirement is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR 20.1301(d). The requirement specifies the preparation and submittal of a Special Report whenever the calculated doses due to releases of radioactivity and to radiation from uranium fuel cycle sources exceed 25 mrems to the whole body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems. Even if a site was to contain up to four reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the reactor units (including outside storage tanks, etc.) are kept small. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40 CFR Part 190, submittal of the Special Report within 30 days with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR Part 190.11 and 10 CFR Part 20.2203(a)(4), is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to other requirements for dose limitation of 10 CFR Part 20, as addressed in Section 3.2 and 3.1 of the ODCM. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle. Demonstration of compliance with the limits of 40 CFR Part 190 or with the design objectives of Appendix I to 10 CFR Part 50 will be considered to demonstrate compliance with the 0.1 rem limit of 10 CFR 20.1301.

B-6.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (REMP)

The Radiological Environmental Monitoring Program required by this requirement provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the station 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. 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 (LLD). The LLDs required by Table 6-3 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 (revised annually).

B-6.2 LAND USE CENSUS

This requirement 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 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^2 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^2.

B-6.3 INTERLABORATORY COMPARISON PROGRAM

The requirement for participation in an Interlaboratory Comparison Program is provided to ensure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are valid for the purposes of Section IV.B.2 of Appendix I to 10 CFR Part 50.

APPENDIX C

DEFINITIONS

Note:

The following definitions were derived from the Palo Verde Nuclear Generating Station Technical Specifications. These selected definitions support those portions of the Technical Specifications which were transferred to the ODCM and have been incorporated into the Requirements sections of the ODCM.

Definitions:

The defined terms of this section appear in capitalized type and are applicable throughout the Requirements sections of this ODCM.

ACTION

ACTION shall be that part of a requirement which prescribes remedial measures required under designated conditions.

CHANNEL CALIBRATION

See the Technical Specification definition.

CHANNEL CHECK

See the Technical Specification definition.

CHANNEL FUNCTIONAL TEST

See the Technical Specification definition.

DOSE EQUIVALENT I-131

See the Technical Specification definition.

FREQUENCY NOTATION

The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table C-1.

GASEOUS RADWASTE SYSTEM

A GASEOUS RADWASTE SYSTEM shall be any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system offgases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

MEMBER(S) OF THE PUBLIC

MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the licensee, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

OFFSITE DOSE CALCULATION MANUAL

See the Technical Specification definition.

OPERABLE-OPERABILITY

See the Technical Specification definition.

MODE

See the Technical Specification definition.

PROCESS CONTROL PROGRAM

The PROCESS CONTROL PROGRAM shall contain the current formulas, sampling, analyses, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

PURGE-PURGING

PURGE or PURGING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration, or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

RATED THERMAL POWER

See the Technical Specification definition.

SITE BOUNDARY

The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

SOLIDIFICATION

SOLIDIFICATION shall be the conversion of radioactive wastes from liquid systems to a homogeneous (uniformly distributed), monolithic, immobilized solid with definite volume and shape, bounded by a stable surface of distinct outline on all sides (free-standing).

SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

DEFINITIONS (Continued)

UNRESTRICTED AREA

An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by the licensee for the purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

VENTILATION EXHAUST TREATMENT SYSTEM

A VENTILATION EXHAUST TREATMENT SYSTEM shall be any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

VENTING

VENTING shall be the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration, or other operating condition, in such a manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.

TABLE C-1

FREQUENCY NOTATION

NOTATION	FREQUENCY
S	At least once per 12 hours.
D	At least once per 24 hours.
W	At least once per 7 days.
4/M	At least 4 times per month at intervals no greater than 9 days and a minimum of 48 times per year.
M	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 184 days.
ANNUALLY	At least once per 365 days
R	At least once per 18 months.
P	Completed prior to each release.
S/U	Prior to reactor startup.
N.A.	Not Applicable.

APPENDIX D
REFERENCES

1 Title 10, Code of Federal Regulations, Part 20, "Standards for Protection Against Radiation."

2 Title 10, Code of Federal Regulations, Part 50, "Domestic Licensing of Production and Utilization Facilities."

3 Title 40, Code of Federal Regulations, Part 190, Environmental Radiation Protection Standards for Nuclear Power Operations."

4 Federal Register, Vol. 58, No. 245, Thursday, December 23, 1993, Notices, pages 68170-68179.

5 Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974.

6 Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50; Appendix I;" Revision 1, October 1977.

7 Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors," Revision 1, July 1977.

8 Regulatory Guide 4.1, "Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants," Revision 1, April 1975.

9 NUREG-0133, Preparation of Radiological Effluent Technical Specifications For Nuclear Power Plants, Oct. 1978.

10 NUREG 0841, "Final Environmental Statement Related to the Operation of Palo Verde Nuclear Generating Station, Units 1, 2, and 3", Section 5.9.1.4, February, 1982.

11 NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactor", Arpil 1991.

12 Environmental Report Operating License Stage, Palo Verde Nuclear Generating Station, December 1981.

13 PVNGS Updated Final Safety Analysis Report

14 Calculation 13-NC-ZY-252, "Annual Average Dose from Normal Operation Liquid Discharge from the Evaporation Pond", Rev 0.

15 Calculation 13-NC-ZY-253, "Annual Average Dose from Normal Operation Airborne Direct and Sky Shine from the Evaporation Pond", Rev 0.

16 Calculation 13-NC-ZY-254, "Radiation Dose Due to an Evaporation Pond Dike Failure During a Seismic Event", Rev. 0..

ODCM, REVISION 12
SUMMARY OF CHANGES

Page 62 - revised language in 6.1 to allow determination of REMP sample locations to be based on data from the pre-operational and/or the operational monitoring periods
Pages 64 - 66 - revised several sections of Table 6-1 (airborne, direct radiation, milk, vegetation)
Page 67 - added "and distance" to notation 'e'
Page 71 - deleted reference to "October 31" since the desert growing season does not end in October
Pages 73 - 76 - updated REMP sample locations and designations
Page 77 - updated REMP sample locations on Figure 6-1
Page 78 - updated REMP sample locations on Figure 6-2

REVISION REQUEST FORM

DATE: 4-15-97

ORIGINATOR: Louis Drinovsky EXT: 6955 PAGE 1 OF 2

Description and Justification of Revision (ODCM, Rev. 12):

I. INTRODUCTION

The Radiological Environmental Monitoring Program (REMP) is required to be performed as per the Offsite Dose Calculation Manual (ODCM). Section 6.0 of the ODCM defines the REMP. A Land Use Census is required to be performed annually per Section 6.2.1. The census is performed in accordance with 74RM-0EN07, Land Use Census, and identifies nearest residents, gardens, and milk animals.

The purpose of the census is to identify changes in local land use which either increases the dose to a member of the public or identifies a potentially significant exposure pathway.

II. REVISION/JUSTIFICATION

The requested changes are necessary due to the results of the 1997 land use census. These changes are to be made to Table 6-4 of the ODCM and include the following:

The Masengales no longer live at site #49. Replace the name "Masengale" with "Chowanec" and change the street address to "375th" Ave.

The Bigelow vegetation sample location, site #64, is no longer available and should be deleted.

Change site #52 to "NNE2", and revise the location description to "Payne residence, 3515 S. 375th Ave."

Revise Figure 6-1 locations as follows:

Move site #52 to the location listed above.

Delete site #64.

REVISION REQUEST FORM

DATE: 4-15-97

ORIGINATOR: Louis Drinovsky EXT: 6955 PAGE 2 OF 2

Description and Justification of Revision (ODCM, Rev. 12) -continued
LJD 4-25-97

None of the changes affect the level of radioactive effluent control required by 10CFR20.106, 40CFR190, 10CFR50.36a, or 10CFR50, Appendix I, since the REMP is designed to verify the effectiveness of the in-plant measures used for controlling the release of radioactive materials. Changing the REMP sample locations will not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

Approved by: Terry D. Johnson Date: 4/15/97

~~Radiological Monitoring~~ Department Leader
Chemistry Support

TECHNICAL SPECIFICATION REFERENCE

A. Periodic Review and/or Revision Requirements:

Technical Specification, Section 6.8.4.g and Section 6.8.4.h have been reviewed. The program elements required to be contained in the ODCM are present in this review/revision of the ODCM.

ODCM Revision No. 12

Initiator Name (printed) Louis Drinovsky

Signature Louis Drinovsky Date 4-15-97

Technical Reviewer K KUTNER Date 4-15-97

B. Additional Review Requirements:

This ODCM revision submittal contains;

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and;

2 A determination that the change will maintain the level of radioactive effluent control required by 10CFR20.106, 40CFR190, 10CFR50.36a, and Appendix I to 10CFR50, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3 Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

Initiator Louis Drinovsky Date 4-15-97

Technical Reviewer K KUTNER Date 4-15-97

Evaluation Log No.:_____-_____

10CFR50.59
SCREENING AND EVALUATION

DOCUMENT UNDER REVIEW: Offsite Dose Calculation Manual, Rev. 12, Table 6-4 and Figure 6-1 only

50.59 REVISION: 0

DESCRIPTION OF PROPOSED CHANGE:
Revise table and figure identifying new sample locations per 1997 land use census results

(continue on Response Justification Page)

10CFR50.59 SCREENING *(Provide References on Response Justification Page)* Does the proposed change:	NO	YES
1. Make changes in the facility as described in the Licensing Basis (refer to ¶ 4.1.4)	X	
NOTE: Prior to the modification of radioactive waste systems, review the modification against the specific criteria in IEC 80-18 (Appendix G).	X	
2. Make changes in procedures as described in the Licensing Basis (refer to ¶ 4.1.4)	X	
3. Involve test or experiments not described in the Licensing Basis (refer to ¶ 4.1.4)		
4. Require a change to the technical specifications?	X	

_____ If any answer to questions 1 through 3 is "YES," then a 10CFR50.59 evaluation is required. When the Evaluation is completed, and prior to the review contact Document Control at ext. 82-6624 to obtain a tracking log number and enter the number in the Evaluation Log number block above. An UFSAR Change Request per procedure 93AC-0LC01 may also be required.

_____ If answer 4 is "YES," then a Technical Specification Change Request per procedure 93AC-0LC01 and NRC approval is required prior to implementation. (See the procedure for an explanation of exceptions to this)

__X__ If all answers 1 through 4 are "NO," no 10CFR50.59 Evaluation required or Technical Specification change is required, recommend action approval.

10CFR50.59 EVALUATION *(Provide Response Justification with References)*		
5. May the probability of an accident previously evaluated in the UFSAR be increased?	—	—
6. May the consequences of an accident previously evaluated in the UFSAR be increased?	—	—
7. May the probability of a malfunction of equipment important to safety be increased?	—	—
8. May the consequences of a malfunction of equipment important to safety be increased?	—	—
9. May the possibility of an accident of a different type than any previously evaluated in the UFSAR be created?	—	—
10. May the possibility of a different type of malfunction than any previously evaluated in the UFSAR be created?	—	—
11. Is the margin of safety as defined in the basis for any technical specification reduced?	—	—

Call NFM at Ext. 82-5339 (alt 82-5092). Duty Pager 2667.
Review Requested by NFM and Completed Yes ____ No Review Requested by NFM ___

_____ If any answer to questions 5 through 11 is "YES," then an unreviewed safety question is identified. NRC approval is required prior to implementation.

_____ If answers 5 through 11 all are "NO," there is no unreviewed safety question and action approval is recommended.

_____ If UFSAR Chapter 6 or 15 are potentially affected, forward a copy of evaluation to Nuclear Fuels Management.

I verify that the above screening/evaluation is adequate and accurate and that the undersigned are currently qualified in accordance with Appendix B of this procedure.

Louis Drinovsky 4-15-97
SCREENER/EVALUATOR DATE

Louis Drinovsky
SCREENER/EVALUATOR (PRINT)

4/15/97
50.59 REVIEWER DATE

James M Shawver
50.59 REVIEWER (PRINT)

ACTION UNDER REVIEW: *(NAME/TITLE)*
ffsite Dose Calculation Manual, Rev. 12, Table 6-4 and Figure 6-1 only

REVISION: 0

CEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
1	NO The ODCM requires that a land use census be performed annually. The purpose of the census is to identify changes in local land use which either increases the dose to a member of the public or identifiies a potentially significant exposure pathway. The proposed changes are to radiological environmental sample locations necessitated by information obtained during the 1997 performance of the land use census. These changes do not make changes in any structures, systems, or components (SSCs), nor could they affect any SSCs of the facility as described in licensing basis documents.
2	NO The land use census is required to be performed by licensing basis documents. The proposed changes in radiological environmental sample locations will not make changes in procedures described in the licensing basis documents.
3	NO The proposed change, to revise radiological environmental sample locations, does not involve tests or experiments.
4	NO No changes to Technical Specifications will be required as a result of making the ODCM changes referenced above.
	References:
	10CFR50, Appendix I, Section IV.B.3
	Tech Spec 6.8.4h, Amendments 112(Unit 1) 104(Unit 2) 84(Unit 3)
	ODCM; Table 6-4 and Figure 6-1, Rev. 11
	BTP, Rev. 1, 1979
	UFSAR, Sections 3.1, 11.5, 12.3, 13.1, Rev. 8

Evaluation Log No.:_____-_____

10CFR50.59

SCREENING AND EVALUATION

ACTION UNDER REVIEW:
Offsite Dose Calculation Manual, Rev. 12, Table 6-4 and Figure 6-1 only

50.59 REVISION: 0

DESCRIPTION OF PROPOSED CHANGE:
Revise table and figure identifying new sample locations per 1997 land use census results

(continue on Response Justification Page)

10CFR50.59 SCREENING *(Provide References on Response Justification Page)* Does the proposed change:	NO	YES
1. Make changes in the facility as described in the Licensing Basis (refer to ¶ 4.1.4)	X	
NOTE: Prior to the modification of radioactive waste systems, review the modification against the specific criteria in IEC 80-18 (Appendix G).	X	
2. Make changes in procedures as described in the Licensing Basis (refer to ¶ 4.1.4)	X	
3. Involve test or experiments not described in the Licensing Basis (refer to ¶ 4.1.4)	X	
4. Require a change to the technical specifications?	X	

_____ If any answer to questions 1 through 3 is "YES," then a 10CFR50.59 evaluation is required. When the Evaluation is completed, and prior to the review contact Document Control at ext. 82-5439 to obtain a tracking log number and enter the number in the Evaluation Log number block above. An UFSAR Change Request per procedure 93DP-0LC03 may also be required.

_____ If answer 4 is "YES," then a Technical Specification Change Request per procedure 93DP-0LC03 and NRC approval is required prior to implementation. (See the procedure for an explanation of exceptions to this)

X If all answers 1 through 4 all are "NO," no 10CFR50.59 Evaluation required or Technical Specification change is required, recommend action approval.

10CFR50.59 EVALUATION *(Provide Response Justification with References)*		
5. May the probability of an accident previously evaluated in the UFSAR be increased?	___	___
6. May the consequences of an accident previously evaluated in the UFSAR be increased?	___	___
7. May the probability of a malfunction of equipment important to safety be increased?	___	___
8. May the consequences of a malfunction of equipment important to safety be increased?	___	___
9. May the possibility of an accident of a different type than any previously evaluated in the UFSAR be created?	___	___
10. May the possibility of a different type of malfunction than any previously evaluated in the UFSAR be created?	___	___
11. Is the margin of safety as defined in the basis for any technical specification reduced?	___	___

Call NFM at Ext. 82-5339 (alt 82-5092). Duty Pager 2667.
Review Requested by NFM and Completed Yes ____ No Review Requested by NFM ___

_____ If any answer to questions 5 through 11 is "YES," then an unreviewed safety question is identified. NRC approval is required prior to implementation.

_____ If answers 5 through 11 all are "NO," there is no unreviewed safety question and action approval is recommended.

_____ If UFSAR Chapter 6 or 15 are potentially affected, forward a copy of evaluation to Nuclear Fuels Management.

I verify that the above screening/evaluation is adequate and accurate and that the undersigned are currently qualified in accordance with Appendix B of this procedure.

Louis Drinovsky 12-16-97
SCREENER/EVALUATOR DATE

Louis Drinovsky
SCREENER/EVALUATOR (PRINT)

Regina Cunningham 12-17-97
50.59 REVIEWER DATE

Regina Cunningham
50.59 REVIEWER (PRINT)

ACTION UNDER REVIEW: *(NAME/TITLE)*
Offsite Dose Calculation Manual, Rev. 12, Table 6-4 and Figure 6-1 only

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	INTRODUCTION
	The Radiological Environmental Monitoring Program (REMP) is required to be performed per the Offsite Dose Calculation Manual (ODCM). Section 6 of the ODCM defines the REMP. A Land Use Census is required to be performed annually per Section 6.2.1. The census is performed in accordance with Nuclear Administrative and Technical Manual procedure 74RM-0EN07, Land Use Census, and identifies the nearest residents, gardens, and milk animals. The purpose of the census is to identify changes in local land use which either increases the dose to a member of the public or identifies a potentially significant exposure pathway. The changes being made were due to information obtained during the performance of the census.
1	NO The ODCM requires that a land use census be performed annually. The purpose of the census is to identify changes in local land use which either increases the dose to a member of the public or identifiies a potentially significant exposure pathway. The proposed changes are to radiological environmental sample locations necessitated by information obtained during the 1997 performance of the land use census. These changes do not make changes in any structures, systems, or components (SSCs), nor could they affect any SSCs of the facility as described in licensing basis documents.
2	NO The land use census is required to be performed by licensing basis documents. The proposed changes in radiological environmental sample locations will not make changes in procedures described in the licensing basis documents, but will implement the requirements imposed by the ODCM.

ACTION UNDER REVIEW: *(NAME/TITLE)*
Offsite Dose Calculation Manual, Rev. 12, Table 6-4 and Figure 6-1 only

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
3	NO The proposed change, to revise radiological environmental sample locations, involves implementing ODCM requirements by changing sample locations based on a land use census and dose evaluations. These changes could not even be construed to involve tests or experiments.
4	NO Technical specifications require that the methodology and parameters in the ODCM be followed. The technical specifications do not indicate where sample locations are sited. Making changes in REMP sample locations could not require that a technical specification change be made.
	References:
	10CFR50, Appendix I, Section IV.B.3
	Tech Spec 6.8.4h, Amendments - 113(Unit 1) 106(Unit 2) 85(Unit 3)
	ODCM; Table 6-4 and Figure 6-1, Rev. 11
	BTP, Rev. 1, 1979
	UFSAR, Sections 3.1, 11.5, 12.3, 13.1, Rev. 8

REVISION REQUEST FORM

DATE: 5-8-97

ORIGINATOR: Louis Drinovsky EXT: 6955 PAGE 1 OF 2

Description and Justification of Revision (ODCM, Rev. 12)

I. INTRODUCTION

The REMP was designed to monitor the environs near the PVNGS using the guidance of the NRC Branch Technical Position (BTP) on environmental monitoring (Rev. 1, 1979). Factors used in the program design are further delineated in the PVNGS Environmental Report - Operating License Stage (ER-OL), section 6.1.

A review of these documents indicates a need to revise the ODCM to provide an enhanced description of the REMP and its intent to meet the regulatory requirements.

II. REVISION/JUSTIFICATION

Refer to 10CFR50.59 Screening and Evaluation, log no. 97-00089 for a complete discussion and justification of these changes.

III. SUMMARY

No changes in physical air sample locations are required as a result of the review.

Tables 6-1 and 6-4 will be revised to reflect the changes referenced with regard to air sample sites #21 and #29. Also, site #40 will be added to the list of highest D/Q sectors as it serves a dual purpose according to the ER-OL. The Food Products section will also be revised to reflect the criteria of the land use census for determining REMP vegetation sample location changes. The Milk sample section will have note "e" added since note "e" is applicable for all control samples. Finally, note "e" will be revised to add "and distance" as an editorial change. This language was inadvertently changed when Tech Spec 3/4.12 was relocated to the ODCM.

Section 6.1 will be revised to add a statement for the basis of decisions on REMP sample locations.

Section 6.2b. will be revised to delete the October 31 date for deletion of samples from the REMP.

REVISION REQUEST FORM

DATE: 5-8-97

ORIGINATOR: Louis Drinovsky EXT: 6955 PAGE 2 OF 2

Description and Justification of Revision (ODCM, Rev. 12)

None of the changes affect the level of radioactive effluent control required by 10CFR20.106, 40CFR190, 10CFR50.36a, or 10CFR50, Appendix I, since the REMP is designed to verify the effectiveness of the in-plant measures used for controlling the release of radioactive materials. Changes made to Section 6 of the ODCM will not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

Approved by: _____ Date: 6/4/97

Radiological Monitoring Department Leader

TECHNICAL SPECIFICATION REFERENCE

A. Periodic Review and/or Revision Requirements:

Technical Specification, Section 6.8.4.g and Section 6.8.4.h have been reviewed. The program elements required to be contained in the ODCM are present in this review/revision of the ODCM.

ODCM Revision No. 12

Initiator Name (printed) Louis Drinovsky

Signature Louis Drinovsky Date 5-8-97

Technical Reviewer K KUNER Date 5-27-97

B. Additional Review Requirements:

This ODCM revision submittal contains;

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and;

2 A determination that the change will maintain the level of radioactive effluent control required by 10CFR20.106, 40CFR190, 10CFR50.36a, and Appendix I to 10CFR50, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3 Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

Initiator Louis Drinovsky Date 5-8-97

Technical Reviewer K KUNER Date 5-27-97

Evaluation Log No.: 97 -00089

10CFR50.59
SCREENING AND EVALUATION

ACTION UNDER REVIEW: ODCM, Section 6, Radiological Environmental Monitoring Program

50.59 REVISION: 0

DESCRIPTION OF PROPOSED CHANGE:
Revise Section 6 due to document and data reviews

(continue on Response Justification Page)

10CFR50.59 SCREENING *(Provide References on Response Justification Page)* Does the proposed change:	NO	YES
1. Make changes in the facility as described in the Licensing Basis (refer to ¶ 4.1.4)	X	
NOTE: Prior to the modification of radioactive waste systems, review the modification against the specific criteria in IEC 80-18 (Appendix G).		X
2. Make changes in procedures as described in the Licensing Basis (refer to ¶ 4.1.4)	X	
3. Involve test or experiments not described in the Licensing Basis (refer to ¶ 4.1.4)		
4. Require a change to the technical specifications?	X	

X If any answer to questions 1 through 3 is "YES," then a 10CFR50.59 evaluation is required. When the Evaluation is completed, and prior to the review contact Document Control at ext. 82-6624 to obtain a tracking log number and enter the number in the Evaluation Log number block above. An UFSAR Change Request per procedure 93AC-0LC01 may also be required.

____ If answer 4 is "YES," then a Technical Specification Change Request per procedure 93AC-0LC01 and NRC approval is required prior to implementation. (See the procedure for an explanation of exceptions to this)

____ If all answers 1 through 4 are "NO," no 10CFR50.59 Evaluation required or Technical Specification change is required, recommend action approval.

10CFR50.59 EVALUATION *(Provide Response Justification with References)*		
5. May the probability of an accident previously evaluated in the UFSAR be increased?	X	
6. May the consequences of an accident previously evaluated in the UFSAR be increased?	X	
7. May the probability of a malfunction of equipment important to safety be increased?	X	
8. May the consequences of a malfunction of equipment important to safety be increased?	X	
9. May the possibility of an accident of a different type than any previously evaluated in the UFSAR be created?	X	
10. May the possibility of a different type of malfunction than any previously evaluated in the UFSAR be created?	X	
11. Is the margin of safety as defined in the basis for any technical specification reduced?	X	

Call NFM at Ext. 82-5339 (alt 82-5092). Duty Pager 2667.
Review Requested by NFM and Completed Yes ____ No Review Requested by NFM X

____ If any answer to questions 5 through 11 is "YES," then an unreviewed safety question is identified. NRC approval is required prior to implementation.

X If answers 5 through 11 all are "NO," there is no unreviewed safety question and action approval is recommended.

____ If UFSAR Chapter 6 or 15 are potentially affected, forward a copy of evaluation to Nuclear Fuels Management.

I verify that the above screening/evaluation is adequate and accurate and that the undersigned are currently qualified in accordance with Appendix B of this procedure.

Louis Dinovsky 5-8-97
SCREENER/EVALUATOR DATE

Louis Dinovsky
SCREENER/EVALUATOR (PRINT)

Regina Cunningham 6-4-97
50.59 REVIEWER DATE

Regina Cunningham
50.59 REVIEWER (PRINT)

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	INTRODUCTION
	The REMP was designed to monitor the environs near the PVNGS using the guidance of the NRC Branch Technical Position (BTP) on environmental monitoring (Rev. 1, 1979). Factors used in the program design are further delineated in the PVNGS Environmental Report - Operating License Stage (ER-OL), section 6.1.
	A review of these documents indicates a need to revise the ODCM to provide an enhanced description of the REMP and its intent to meet the regulatory requirements.
	SUMMARY OF CHANGES
	Section 6.1 Requirements: REMP
	Change the first paragraph to read:
	"The radiological environmental monitoring program shall be conducted as specified in Table 6-1, based on locations determined using data from the pre-operational monitoring period; and/or the operational monitoring period indicating a need to make changes in the program."
	Table 6-1, Airborne
	Change the description in column 2, first paragraph, to the following:
	"Samples from 5 locations: 4 samples at or near the SITE BOUNDARIES (#14A, 15, 29, 40) including 3 different sectors of the highest calculated annual average ground level D/Q. *"
	Table 6-1, Food Products
	Change the description in column 2, first paragraph, to the following:
	"2 samples (#47, #52) of 3 types of broad leaf vegetation (as available) from locations identi-

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	fied per the criteria of Section 6.2b. of this manual."
	"1 control sample (#62) of 3 types of broad leaf vegetation (as available) grown 15 to 30 km
	distant in the least prevalent wind direction. [e] "
	Table 6-1, TABLE NOTATION
	Add "and distance" (after "wind direction") to note "e".
	Table 6-1, Milk
	Add notation "e" to the end of the second paragraph in column 2 referring to the control loca-
	tion.
	Table 6-4
	1. Revise descriptions for site #21 and #29, air. Site #21 should be designated a supplemental
	sample location and site #29 should be designated a required sample location.
	Section 6.2, Action b.
	Change ..."may be deleted from this monitoring program after (October 31) of the year in
	which this land use census was conducted." to read ..."may then be deleted from the monitor-
	ing program."
	JUSTIFICATION FOR CHANGES
	Section 6.1 Requirements: REMP
	There is no definitive regulatory criteria which provides direction with respect to revising air
	sample locations due to the possibility of local meteorological conditions changing over time,

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	only on where they should be sited initially. REMP sample locations are allowed to be changed per Regulatory Guide 4.1 and the BTP guidance. This particular guidance is specific to decreasing samples and/or sample frequencies, with justification, after three years of commercial operation, and is not intended for revising the monitoring program due to changes in meteorological conditions.
	The requirements in Table 6-1 do not indicate what meteorological data set is to be used for such things as "highest calculated annual average ground level D/Q", or "in the least prevalent wind direction". Adding a statement allowing for the use of data generated pre-operational and/or operational provides for using meteorological data of choice. It is then up to the individual performing program evaluations to justify appropriate changes.
	Table 6-1, Airborne
	The required (current) air sample sites listed in the ODCM are as follows:
	3 in the highest D/Q sectors at or near the site boundary.
	The highest D/Q sectors are, (from the ER-OL), in descending order, W, WNW, NNE, N, NW, and NNW. In the ER-OL discussion, it was decided to locate a sample site in the N sector instead of the WNW sector since the W and WNW sites would be in such close proximity to each other. These criteria are met by site #29 (W), 14A (NNE), and 40 (N). Note that these are the locations required by the BTP. Two additional air sample stations were added due to the importance of placing samplers in sectors having higher population concentrations (site #17A (E) and site #15 (NE)). Since site #40 is used to meet another criteria, site #15 was added to the program as it was in the most prominent wind direction.

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	Site #29 (W) should be listed in the ODCM, Table 6-1, instead of the present situation which identified site #21 (S) as being one of the highest D/Q sectors. Based on the ER-OL criteria, site #40 (N) should be added to the list since it was one of the three highest D/Q sectors.
	1 from areas of special interest, which is from the vicinity of a community having the highest calculated annual average D/Q.
	This criterion is met by site #40 (N), located close to Wintersburg.
	1 sample from a control location 15-30 km (10-20 mi) distant and in the least prevalent wind direction.
	This criteria is met by site #6A (SSE). The location meets the distance criterion, but is not in the least prevalent wind direction, ESE, but in the SSE. Note "e" to Table 6-1 gives an exception which allows ..."other sites that provide valid background data..." to be substituted. Air sample site #6A is a valid background location since it is in the same general direction of least prevalent wind (SE quadrant) and meets the distance criterion.
	One of the considerations for evaluating air sample siting is how the meteorological conditions may have changed since the original determination of sample locations. The following table is a comparison of selection criteria to validate the original siting.

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION

Table 1

Least prevalent wind direction		*Highest D/Q (m^{-2})*	
1973-1978	*1992-1996*	*1973-1978*	*1992-1996*
WNW (3.9%)	SE (2.0%)	1.6E-08 (W)	1.4E-08 (NNE)
NW (4.0%)	ESE (2.8%)	1.3E-08 (WNW)	8.5E-09 (N)
NNW (4.5%)	SSE (2.9%)	1.2E-08 (NNE)	8.4E-09 (W)
SSE (4.5%)	ENE (3.7%)	1.1 E-08 (N)	7.7E-09 (NE)

As noted on Table 1, the 1992-1996 data show that the highest D/Q sectors are consistent with the 1973-1978 data, with the exception of the WNW sector, which is no longer identified as one of the four highest D/Q sectors. The present air sample locations cover the highest D/Q sectors for both sets of data (site #14A, NNE sector; site #15, NE sector; site #29, W sector; site #40, N sector). Therefore, no changes would be warranted with respect to air sample indicator locations no matter which set of meteorological data were used.

The siting of the control air sample station is not so straight forward. The least prevalent wind direction is not consistent between sets of data. The 1973-1978 data show the least prevalent wind direction as WNW, while the 1992-1996 data show it to be from the SE. As can be seen on Table 1, the sectors in the same compass quadrant with the least prevalent direction are also generally low and could be used as valid control station sectors.

Since the data indicate a change in the least prevalent wind direction, the question then becomes, is site #6A located where it provides *valid background data?* Is there value in changing the control location? Should the siting criteria be dependent on 5 years of historical data, or

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	should it be based on 10 years of data? How often should the locations be evaluated and/or changed?
	The value of a control air sample station is high, especially for trending background data and comparing to indicator sites. Even though site #6A is located in the SSE sector, which does not meet the least prevalent wind direction criterion when using the 1992-1996 meteorological data, there is an air sample site in use which does meet the intent of this criterion. The dependent variable is the selection of bounding meteorological data.
	Site #35 is located 12.7 km (7.9 miles) from PVNGS in the NNW sector. If it were decided to use the 1992-1996 data as the sample location siting criteria, this location would be deemed a control site since it provides *valid background data* in accordance with Table 6-1, note 'e'.
	Table 6-1, Food Products
	Broad leaf vegetation sample locations are determined by a combination of the land use census (which identifies nearest gardens >500 ft^2 in each sector annually) and dose calculations. The purpose is to make a determination as to which locations have the most significant exposure potential and obtaining samples there, if possible.
	Because of the desert environment, there are few gardens located near PVNGS. The criteria with regard to obtaining samples "grown nearest each of two offsite locations of highest predicted annual average ground-level D/Q" is overly restrictive. There is no alternative in the present language of this section of the ODCM. These samples locations should be based on dose potential, which is what section 6.2, action b. describes.

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	Additionally, notation 'e' should be added to provide flexibility with regard to a control sample, similar to the air sample control location. As long as the control sample location provides valid background data, the purpose of the sample is being met.
	Table 6-1, TABLE NOTATION
	Notation 'e' was derived from the BTP. The original Tech Spec, 3/4.12, included the exact language from the BTP table notation. When this tech spec section was transferred to the ODCM, the language was inadvertently changed, deleting the "and distance" statement. This should be added back into the language of the notation.
	Table 6-1, Milk
	Notation 'e' should be added to the section concerning the control sample for the same reasons as listed above for the food products control location.
	Table 6-4
	The information concerning air sample site #21 and #29 needs to be revised for the reasons previously discussed in this document.
	Section 6.2, Action b.
	Section 6.2b. provides criteria for making a determination whether or not sample locations need to be changed. The criteria used is dose or dose commitment data. If the data indicate a location which yields a value 20% greater than values where current samples are being taken, the new location is added to the REMP and the location with the lowest calculated dose or dose commitment may be deleted. The deletion is to occur "after October 31 of the year in which the land use census was conducted." This date is meant to correlate with the end of the growing

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	season for that year. Normal harvests for indicator locations has historically occurred in this area in the January-June time frame. The BTP does not reference a date, but refers to the end of the growing season. Since the October 31 date has not historically related to the end of the growing season in this area, it should be removed from the table.
1	NO The REMP is required to be performed by licensing basis documents. However, no aspect of the program could affect the facility since its function is to monitor the environs near PVNGS. All the changes are to ensure the ODCM correctly reflects the REMP and also meets the intent of environmental monitoring regulations. These changes do not make changes in any structures, systems, or components (SSCs), nor could they affect any SSCs of the facility as described in licensing basis documents.
2	YES The proposed changes are to the REMP section of the ODCM. The ODCM is a licensing basis document. The REMP section of the ODCM was developed using guidance form the BTP on environmental monitoring and from locations described in the ER-OL. All proposed changes are changes which could be considered licensing basis procedure changes since they describe implementation of the REMP. Some REMP sampling location criteria in the ODCM are being changed which were descibed in the ER-OL.
3	NO Revision of section 6 of the ODCM does not involve any tests or experiments. The purpose of the changes is to accurately describe the basis for the current monitoring program and clarify the PVNGS position regarding how sample locations are to be determined. In this process, no tests or experiments are carried out.

ACTION UNDER REVIEW: *(NAME/TITLE)*
[redacted]CM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

[redacted]EDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
4	NO The technical specifications require the ODCM implementation (tech spec 6.8.1i., 6.8.1j., 6.8.4h.) but do not specifically describe how to perform the processes contained in the ODCM. No technical specification changes would be required as a result of the proposed changes.
5	NO One of the purposes of the REMP is to monitor potential significant exposure pathways to the public. This required program involves various environmental samples, analysis of samples, and evaluation of results obtained. The implementaiton of this program or any changes to it could not increase the probability of any accident.
6	NO The proposed changes to section 6 of the ODCM will not affect the consequences of any accidents. One of the purposes of the REMP is to monitor potential significant exposure pathways to the public. This required program involves various environmental samples, analysis of samples, and evaluation of results obtained. Even though the analysis of REMP samples could be used to evaluate the results of an accident (after the fact), the consequences of an accident could not be increased by the performance of any aspect of this program.
7	NO The REMP does not interface with any SSC and is performed completely outside the power block. Making changes in the REMP could not increase the probability of a malfunction of equipment important to safety.
8	NO The REMP does not interface with any SSC and is performed completely outside the power block. Making changes in the REMP could not increase the consequences of a malfunction of equipment important to safety

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
9	NO The REMP does not interface with any SSC and is performed completely outside the power block. Making changes in the REMP could not create the possibility of an accident of any type.
10	NO The REMP does not interface with any SSCs and is performed completely outside the power block. Making changes in the REMP could not create the possibility of a malfunction of any type.
11	NO The applicable section of the technical specifications relating to the REMP is Section 6.8. There are no bases for this administrative section of the technical specifications, so there are no margins of safety implicitly defined. The conduct of the REMP is required to meet licensing basis documents. The purpose of the program is to ensure potentially significant exposure pathways to the public are monitored. The proposed changes to the ODCM will not reduce the ability of the REMP to perform its intended purposes and will provide a better basis for the program as it exists.
	Contacted Henry Till of NFM on 5-8-97.

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	References:
	10CFR50, Appendix I, Section IV.B.3
	Tech Spec 6.8.1i., 6.8.1j., 6.8.4h, Amendments - 112(Unit 1) 104(Unit 2) 84(Unit 3)
	ODCM Section 6, Rev. 11
	BTP, Rev. 1, 1979
	UFSAR, Sections 3.1, 11.5, 12.3, 13.1, 6, 15, Rev. 8
	PVNGS ER-OL, Sections 2.3, 6.1
	US NRC Regulatory Guide 4.1, Rev. 1
	1992-1996 PVNGS XOQ/DOQ and Joint Frequency Distribution data
	NUREG 0841, Final Environmental Statement related to the operation of the Palo Verde Nuclear Generating Station, Units 1, 2, and 3 - February, 1982, Chapter 5.9.1

Evaluation Log No.: 97 -00089

10CFR50.59
SCREENING AND EVALUATION

ON UNDER REVIEW:	50.59 REVISION:
ODCM, Section 6, Radiological Environmental Monitoring Program	1

DESCRIPTION OF PROPOSED CHANGE:
Revise Section 6 due to document and data reviews

(continue on Response Justification Page)

10CFR50.59 SCREENING *(Provide References on Response Justification Page)* Does the proposed change:	NO	YES
1. Make changes in the facility as described in the Licensing Basis (refer to ¶ 4.1.4)	___	X
NOTE: Prior to the modification of radioactive waste systems, review the modification against the specific criteria in IEC 80-18 (Appendix G).	___	X
2. Make changes in procedures as described in the Licensing Basis (refer to ¶ 4.1.4)	X	___
3. Involve test or experiments not described in the Licensing Basis (refer to ¶ 4.1.4)		
4. Require a change to the technical specifications?	X	___

X If any answer to questions 1 through 3 is "YES," then a 10CFR50.59 evaluation is required. When the Evaluation is completed, and prior to the review contact Document Control at ext. 82-5439 to obtain a tracking log number and enter the number in the Evaluation Log number block above. An UFSAR Change Request per procedure 93DP-0LC03 may also be required.

___ If answer 4 is "YES," then a Technical Specification Change Request per procedure 93DP-0LC03 and NRC approval is required prior to implementation. (See the procedure for an explanation of exceptions to this)

___ If all answers 1 through 4 all are "NO," no 10CFR50.59 Evaluation required or Technical Specification change is required, recommend action approval.

10CFR50.59 EVALUATION *(Provide Response Justification with References)*		
5. May the probability of an accident previously evaluated in the UFSAR be increased?	X	___
6. May the consequences of an accident previously evaluated in the UFSAR be increased?	X	___
7. May the probability of a malfunction of equipment important to safety be increased?	X	___
8. May the consequences of a malfunction of equipment important to safety be increased?	X	___
9. May the possibility of an accident of a different type than any previously evaluated in the UFSAR be created?	X	___
10. May the possibility of a different type of malfunction than any previously evaluated in the UFSAR be created?	X	___
11. Is the margin of safety as defined in the basis for any technical specification reduced?	X	___

Call NFM at Ext. 82-5339 (alt 82-5092). Duty Pager 2667.
Review Requested by NFM and Completed Yes ____ No Review Requested by NFM X

___ If any answer to questions 5 through 11 is "YES," then an unreviewed safety question is identified. NRC approval is required prior to implementation.

X If answers 5 through 11 all are "NO," there is no unreviewed safety question and action approval is recommended.

___ If UFSAR Chapter 6 or 15 are potentially affected, forward a copy of evaluation to Nuclear Fuels Management.

I verify that the above screening/evaluation is adequate and accurate and that the undersigned are currently qualified in accordance with Appendix B of this procedure.

Louis Drinovsky 12-17-97
SCREENER/EVALUATOR DATE

Louis Drinovsky
SCREENER/EVALUATOR (PRINT)

Regina Cunningham 12-17-97
50.59 REVIEWER DATE

Regina Cunningham
50.59 REVIEWER (PRINT)

ACTION UNDER REVIEW: *(NAME/TITLE)*
ODCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 1

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	INTRODUCTION
	The REMP was designed to monitor the environs near the PVNGS using the guidance of the NRC Branch Technical Position (BTP) on environmental monitoring (Rev. 1, 1979). Factors used in the program design are further delineated in the PVNGS Environmental Report - Operating License Stage (ER-OL), section 6.1.
	A review of these documents indicates a need to revise the ODCM to provide an enhanced description of the REMP and its intent to meet the regulatory requirements.
	SUMMARY OF CHANGES
	Section 6.1 Requirements: REMP
	Change the first paragraph to read:
	"The radiological environmental monitoring program shall be conducted as specified in Table 6-1, based on locations determined using data from the pre-operational monitoring period; and/or the operational monitoring period indicating a need to make changes in the program."
	Table 6-1, Airborne
	Change the description in column 2, first paragraph, to the following:
	"Samples from 5 locations: 4 samples at or near the SITE BOUNDARIES (#14A, 15, 29, 40) including 3 different sectors of the highest calculated annual average ground level D/Q. *"
	Table 6-1, Food Products
	Change the description in column 2, first paragraph, to the following:
	"2 samples (#47, #52) of 3 types of broad leaf vegetation (as available) from locations identi-

ACTION UNDER REVIEW: *(NAME/TITLE)*
DCM, Section 6, Radiological Environmental Monitoring Program

REVISION: 1

EDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	fied per the criteria of Section 6.2b. of this manual."
	"1 control sample (#62) of 3 types of broad leaf vegetation (as available) grown 15 to 30 km
	distant in the least prevalent wind direction. [e] "
	Table 6-1, TABLE NOTATION
	Add "and distance" (after "wind direction") to note "e".
	Table 6-1, Milk
	Add notation "e" to the end of the second paragraph in column 2 referring to the control loca-
	tion.
	Table 6-4
	1. Revise descriptions for site #21 and #29, air. Site #21 should be designated a supplemental
	sample location and site #29 should be designated a required sample location.
	Section 6.2, Action b.
	Change ..."may be deleted from this monitoring program after (October 31) of the year in
	which this land use census was conducted." to read ..."may then be deleted from the monitor-
	ing program."
	JUSTIFICATION FOR CHANGES
	Section 6.1 Requirements: REMP
	There is no definitive regulatory criteria which provides direction with respect to revising air
	sample locations due to the possibility of local meteorological conditions changing over time,

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	only on where they should be sited initially. REMP sample locations are allowed to be changed per Regulatory Guide 4.1 and the BTP guidance. This particular guidance is specific to decreasing samples and/or sample frequencies, with justification, after three years of commercial operation, and is not intended for revising the monitoring program due to changes in meteorological conditions.
	The requirements in Table 6-1 do not indicate what meteorological data set is to be used for such things as "highest calculated annual average ground level D/Q", or "in the least prevalent wind direction". Adding a statement allowing for the use of data generated pre-operational and/or operational provides for using meteorological data of choice. It is then up to the individual performing program evaluations to justify appropriate changes.
	Table 6-1, Airborne
	The required (current) air sample sites listed in the ODCM are as follows:
	3 in the highest D/Q sectors at or near the site boundary.
	The highest D/Q sectors are, (from the ER-OL), in descending order, W, WNW, NNE, N, NW, and NNW. In the ER-OL discussion, it was decided to locate a sample site in the N sector instead of the WNW sector since the W and WNW sites would be in such close proximity to each other. These criteria are met by site #29 (W), 14A (NNE), and 40 (N). Note that these are the locations required by the BTP. Two additional air sample stations were added due to the importance of placing samplers in sectors having higher population concentrations (site #17A (E) and site #15 (NE)). Since site #40 is used to meet another criteria, site #15 was added to the program as it was in the most prominent wind direction.

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	Site #29 (W) should be listed in the ODCM, Table 6-1, instead of the present situation which identified site #21 (S) as being one of the highest D/Q sectors. Based on the ER-OL criteria, site #40 (N) should be added to the list since it was one of the three highest D/Q sectors.
	1 from areas of special interest, which is from the vicinity of a community having the highest calculated annual average D/Q.
	This criterion is met by site #40 (N), located close to Wintersburg.
	1 sample from a control location 15-30 km (10-20 mi) distant and in the least prevalent wind direction.
	This criteria is met by site #6A (SSE). The location meets the distance criterion, but is not in the least prevalent wind direction, ESE, but in the SSE. Note "e" to Table 6-1 gives an exception which allows ..."other sites that provide valid background data..." to be substituted. Air sample site #6A is a valid background location since it is in the same general direction of least prevalent wind (SE quadrant) and meets the distance criterion.
	One of the considerations for evaluating air sample siting is how the meteorological conditions may have changed since the original determination of sample locations. The following table is a comparison of selection criteria to validate the original siting.

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Table 1

Least prevalent wind direction		*Highest D/Q (m^{-2})*	
1973-1978	*1992-1996*	*1973-1978*	*1992-1996*
WNW (3.9%)	SE (2.0%)	1.6E-08 (W)	1.4E-08 (NNE)
NW (4.0%)	ESE (2.8%)	1.3E-08 (WNW)	8.5E-09 (N)
NNW (4.5%)	SSE (2.9%)	1.2E-08 (NNE)	8.4E-09 (W)
SSE (4.5%)	ENE (3.7%)	1.1 E-08 (N)	7.7E-09 (NE)

As noted on Table 1, the 1992-1996 data show that the highest D/Q sectors are consistent with the 1973-1978 data, with the exception of the WNW sector, which is no longer identified as one of the four highest D/Q sectors. The present air sample locations cover the highest D/Q sectors for both sets of data (site #14A, NNE sector; site #15, NE sector; site #29, W sector; site #40, N sector). Therefore, no changes would be warranted with respect to air sample indicator locations no matter which set of meteorological data were used.

The siting of the control air sample station is not so straight forward. The least prevalent wind direction is not consistent between sets of data. The 1973-1978 data show the least prevalent wind direction as WNW, while the 1992-1996 data show it to be from the SE. As can be seen on Table 1, the sectors in the same compass quadrant with the least prevalent direction are also generally low and could be used as valid control station sectors.

Since the data indicate a change in the least prevalent wind direction, the question then becomes, is site #6A located where it provides *valid background data?* Is there value in changing the control location? Should the siting criteria be dependent on 5 years of historical data, or

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	should it be based on 10 years of data? How often should the locations be evaluated and/or changed?
	The value of a control air sample station is high, especially for trending background data and comparing to indicator sites. Even though site #6A is located in the SSE sector, which does not meet the least prevalent wind direction criterion when using the 1992-1996 meteoroiogical data, there is an air sample site in use which does meet the intent of this criterion. The dependent variable is the selection of bounding meteorological data.
	Site #35 is located 12.7 km (7.9 miles) from PVNGS in the NNW sector. If it were decided to use the 1992-1996 data as the sample location siting criteria, this location would be deemed a control site since it provides *valid background data* in accordance with Table 6-1, note 'e'.
	Table 6-1, Food Products
	Broad leaf vegetation sample locations are determined by a combination of the land use census (which identifies nearest gardens >500 ft^2 in each sector annually) and dose calculations. The purpose is to make a determination as to which locations have the most significant exposure potential and obtaining samples there, if possible.
	Because of the desert environment, there are few gardens located near PVNGS. The criteria with regard to obtaining samples "grown nearest each of two offsite locations of highest predicted annual average ground-level D/Q" is overly restrictive. There is no alternative in the present language of this section of the ODCM. These samples locations should be based on dose potential, which is what section 6.2, action b. describes. Furthermore, the use of highest D/Q criterion is a REMP design which over time may conflict with the results of the land use

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	census. The best information is gathered by performing dose calculations using most recent meteorological data and garden locations. Since a priority of the REMP is to monitor the highest dose potential pathways, it makes the most sense to use this data and not default to a location that may not provide the highest dose potential just because it is in a meteorological sector with highest D/Q indication.
	Additionally, notation 'e' should be added to provide flexibility with regard to a control sample, similar to the air sample control location. As long as the control sample location provides valid background data, the purpose of the sample is being met.
	Table 6-1, TABLE NOTATION
	Notation 'e' was derived from the BTP. The original Tech Spec, 3/4.12, included the exact language from the BTP table notation. When this tech spec section was transferred to the ODCM, the language was inadvertently changed, deleting the "and distance" statement. This should be added back into the language of the notation.
	Table 6-1, Milk
	Notation 'e' should be added to the section concerning the control sample for the same reasons as listed above for the food products control location.
	Table 6-4
	The information concerning air sample site #21 and #29 needs to be revised for the reasons previously discussed in this document.

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	Section 6.2, Action b.
	Section 6.2b. provides criteria for making a determination whether or not sample locations need to be changed. The criteria used is dose or dose commitment data. If the data indicate a location which yields a value 20% greater than values where current samples are being taken, the new location is added to the REMP and the location with the lowest calculated dose or dose commitment may be deleted. The deletion is to occur "after October 31 of the year in which the land use census was conducted." This date is meant to correlate with the end of the growing season for that year. Normal harvests for indicator locations has historically occurred in this area in the January-June time frame. The BTP does not reference a date, but refers to the end of the growing season. Since the October 31 date has not historically related to the end of the growing season in this area, it should be removed from the table.
1	YES The REMP is required to be performed by licensing basis documents. The ODCM is one of these licensing basis documents. Changes to the ODCM, therefore, does make a change as described in a licensing basis document.
2	YES The proposed changes are to the REMP section of the ODCM. The ODCM is a licensing basis document. The REMP section of the ODCM was developed using guidance form the BTP on environmental monitoring and from locations described in the ER-OL. All proposed changes are changes which could be considered licensing basis procedure changes since they describe implementation of the REMP. Some REMP sampling location criteria in the ODCM are being changed which were described in the ER-OL.
3	NO The purpose of the changes is to more accurately describe the basis for the current

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	monitoring program and clarify the PVNGS position regarding how sample locations are to be determined. In this process, no tests or experiments are carried out.
4	NO The technical specifications require the ODCM implementation (tech spec 6.8.1i., 6.8.1j., 6.8.4h.) but do not specifically describe how to perform the processes contained in the ODCM. No technical specification changes would be required as a result of the proposed changes.
5	NO One of the purposes of the REMP is to monitor potential significant exposure pathways to the public. This required program involves various environmental samples, analysis of samples, and evaluation of results obtained. The implementation of this program or any changes to it could not increase the probability of any accident.
6	NO Changes to section 6 of the ODCM could not affect the consequences of any accidents. One of the purposes of the REMP is to monitor potential significant exposure pathways to the public. This required program involves various environmental samples, analysis of samples, and evaluation of results obtained. Even though the analysis of REMP samples could be used to evaluate the results of an accident (after the fact), the consequences of an accident could not be increased by the performance of any aspect of this program.
7	NO The REMP does not interface with any plant SSC and is performed completely outside the power block. The only equipment associated with the performance of the REMP is the environmental air sample equipment. This equipment consists of low volume vacuum pumps which continuously draw air through particulate filters and charcoal canisters. All air sample equipment is located offsite and does not interface with any plant SSC. Making changes in the

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	REMP could not increase the probability of a malfunction of any equipment important to plant safety.
8	NO The REMP does not interface with any plant SSC and is performed completely outside the power block. The only equipment associated with the performance of the REMP is the environmental air sample equipment. This equipment consists of low volume vacuum pumps which continuously draw air through particulate filters and charcoal canisters. All air sample equipment is located offsite and does not interface with any plant SSC. Making changes in the REMP could not increase the consequences of a malfunction of equipment important to plant safety.
9	NO The REMP does not interface with any plant SSC and is performed completely outside the power block. The only equipment associated with the performance of the REMP is the environmental air sample equipment. This equipment consists of low volume vacuum pumps which continuously draw air through particulate filters and charcoal canisters. All air sample equipment is located offsite and does not interface with any plant SSC. Making changes in the REMP could not create the possibility of an accident of any type.
10	NO The REMP does not interface with any plant SSC and is performed completely outside the power block. The only equipment associated with the performance of the REMP is the environmental air sample equipment. This equipment consists of low volume vacuum pumps which continuously draw air through particulate filters and charcoal canisters. All air sample equipment is located offsite and does not interface with any plant SSC. Any malfunction of equipment associated with the REMP could not affect a malfunction of any equipment important to plant safety or any other plant equipment.

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11	NO The applicable section of the technical specifications relating to the REMP is Section 6.8. There are no bases for this administrative section of the technical specifications, so there are no margins of safety implicitly defined. The conduct of the REMP is required to meet licensing basis documents. The purpose of the program is to ensure potentially significant exposure pathways to the public are monitored. The proposed changes to the ODCM will not reduce the ability of the REMP to perform its intended purposes and will provide a better basis for the program as it exists.
	References:
	10CFR50, Appendix I, Section IV.B.3
	Tech Spec 6.8.1i., 6.8.1j., 6.8.4h, Amendments - 113(Unit 1) 106(Unit 2) 85(Unit 3)
	ODCM Section 6, Rev. 11
	BTP, Rev. 1, 1979
	UFSAR, Sections 3.1, 11.5, 12.3, 13.1, 6, 15, Rev. 8
	PVNGS ER-OL, Sections 2.3, 6.1
	US NRC Regulatory Guide 4.1, Rev. 1
	1992-1996 PVNGS XOQ/DOQ and Joint Frequency Distribution data
	NUREG 0841, Final Environmental Statement related to the operation of the Palo Verde Nuclear Generating Station, Units 1, 2, and 3 - February, 1982, Chapter 5.9.1
	Contacted NFM on 12-17-97 - Arshad Taufiq

REVISION REQUEST FORM

DATE: 11-25-97

ORIGINATOR: Louis Drinovsky EXT: 6955 PAGE 1 OF 3

Description and Justification of Revision (ODCM, Rev. 12)

I. INTRODUCTION

The REMP was designed to monitor the environs near the PVNGS using the guidance of the NRC Branch Technical Position (BTP) on environmental monitoring (Rev. 1, 1979). NUREG-1301, Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors, includes information which provides the latest version of guidance with respect to the REMP. Factors used in the program design are further delineated in the PVNGS Environmental Report - Operating License Stage (ER-OL), section 6.1.

It was necessary to move the transit control TLD and designate a second control TLD. Additionally, changes were made in the text of Tables 6-1 and 6-4 . Some changes were editorial and others were made to parallel the language in NUREG-1301.

II. REVISION/JUSTIFICATION

The transit control TLD (site #45) is used to determine the dose while the TLDs are in transit to and from the field locations. During the time period that the TLDs are in the field, these transit control TLDs are stored in a lead pig. For the past several years, this location has been in a trailer at the APS Office in Buckeye. It was decided to move the lead pig onsite since the trailer will no longer be in use.

In order to evaluate how the storage of the TLDs onsite would compare to storing them in Buckeye, duplicate TLDs were placed in a lead pig in the Central Lab during the second and third quarters. The following table indicates the TLD comparison data which were used to justify relocating the transit control TLDs to the onsite location:

Location	Second quarter result (uR/hr)	Third quarter result (uR/hr)
Buckeye lead pig	2.1	1.8
Onsite lead pig	2.2	1.7

The current baseline exposure rate for site #45 is 2.6 uR/hr. Based on these data, the baseline exposure rate for the new location will remain the same (2.6 uR/hr).

Table 6-4 will be revised to change the location for TLD site #45 to the onsite Central lab lead pig and reclassify this location as a supplemental TLD since it is not required by NUREG-1301.

DATE: 11-25-97

ORIGINATOR: Louis Drinovsky EXT: 6955 PAGE 2 OF 3

Description and Justification of Revision (ODCM, Rev. 12)

Table 6-4 will also be revised to indicate that TLD site #6 is a control site. This location is in Gila Bend and has been listed as SP (school or population center) but is being reclassified as a control location due to its distance from the plant (31 miles).

Several places where distances in Table 6-1 are listed in kilometers were enhanced by adding approximate mileage distances.

The language in the Direct Radiation section of Table 6-1 was revised to parallel the language in NUREG-1301. Site #45 was dropped as a required location since it is not required by NUREG-1301.

REMP maps (Figures 6-1 and 6-2) need to be updated due to the changes in locations from Table 6-4.

III. SUMMARY

Table 6-1 will be revised to:
indicate distances in miles as well as kilometers; correctly reflect the NUREG-1301 language with respect to the Direct Radiation section.

Table 6-4 will be revised to:
indicate that site #6 is also a designated control location; site #45 (transit control) is not a required location but a supplemental location.

TECHNICAL SPECIFICATION REFERENCE

A. Periodic Review and/or Revision Requirements:

Technical Specification, Section 6.8.4.g and Section 6.8.4.h have been reviewed. The program elements required to be contained in the ODCM are present in this review/revision of the ODCM.

ODCM Revision No. 12

Initiator Name (printed) Louis Drinovsky

Signature Louis Drinovsky Date 12-2-97

Technical Reviewer [illegible] Date 12-3-97

B. Additional Review Requirements:

This ODCM revision submittal contains;

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and;

2 A determination that the change will maintain the level of radioactive effluent control required by 10CFR20.106, 40CFR190, 10CFR50.36a, and Appendix I to 10CFR50, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

3 Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

Initiator Louis Drinovsky Date 12-2-97

Technical Reviewer [illegible] Date 12-3-97

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Description and Justification of Revision (ODCM, Rev. 12)

None of the changes affect the level of radioactive effluent control required by 10CFR20.106, 40CFR190, 10CFR50.36a, or 10CFR50, Appendix I, since the REMP is designed to verify the effectiveness of the in-plant measures used for controlling the release of radioactive materials. Changes made to Section 6 of the ODCM will not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

Approved by: Harry D. Johnson Date: 12/4/97
Site Chemistry Support Department Leader

Evaluation Log No.:_____-_____

10CFR50.59
SCREENING AND EVALUATION

ON UNDER REVIEW: DCM, Section 6, Radiological Environmental Monitoring Program | 50.59 REVISION: 0

DESCRIPTION OF PROPOSED CHANGE:
Revise Table 6-1, Table 6-4, Figure 6-1 and Figure 6-2

(continue on Response Justification Page)

10CFR50.59 SCREENING *(Provide References on Response Justification Page)* Does the proposed change:	NO	YES
1. Make changes in the facility as described in the Licensing Basis (refer to ¶ 4.1.4)	X	
NOTE: Prior to the modification of radioactive waste systems, review the modification against the specific criteria in IEC 80-18 (Appendix G).	X	
2. Make changes in procedures as described in the Licensing Basis (refer to ¶ 4.1.4)	X	
3. Involve test or experiments not described in the Licensing Basis (refer to ¶ 4.1.4)		
4. Require a change to the technical specifications?	X	

_____ If any answer to questions 1 through 3 is "YES," then a 10CFR50.59 evaluation is required. When the Evaluation is completed, and prior to the review contact Document Control at ext. 82-5439 to obtain a tracking log number and enter the number in the Evaluation Log number block above. An UFSAR Change Request per procedure 93DP-0LC03 may also be required.

_____ If answer 4 is "YES," then a Technical Specification Change Request per procedure 93DP-0LC03 and NRC approval is required prior to implementation. (See the procedure for an explanation of exceptions to this)

X If all answers 1 through 4 all are "NO," no 10CFR50.59 Evaluation required or Technical Specification change is required, recommend action approval.

10CFR50.59 EVALUATION *(Provide Response Justification with References)*		
5. May the probability of an accident previously evaluated in the UFSAR be increased?	___	___
6. May the consequences of an accident previously evaluated in the UFSAR be increased?	___	___
7. May the probability of a malfunction of equipment important to safety be increased?	___	___
8. May the consequences of a malfunction of equipment important to safety be increased?	___	___
9. May the possibility of an accident of a different type than any previously evaluated in the UFSAR be created?	___	___
10. May the possibility of a different type of malfunction than any previously evaluated in the UFSAR be created?	___	___
11. Is the margin of safety as defined in the basis for any technical specification reduced?	___	___

Call NFM at Ext. 82-5339 (alt 82-5092). Duty Pager 2667.
Review Requested by NFM and Completed Yes ____ No Review Requested by NFM ___

_____ If any answer to questions 5 through 11 is "YES," then an unreviewed safety question is identified. NRC approval is required prior to implementation.

_____ If answers 5 through 11 all are "NO," there is no unreviewed safety question and action approval is recommended.

_____ If UFSAR Chapter 6 or 15 are potentially affected, forward a copy of evaluation to Nuclear Fuels Management.

I verify that the above screening/evaluation is adequate and accurate and that the undersigned are currently qualified in accordance with Appendix B of this procedure.

Louis Dinovsky 12-3-97
SCREENER/EVALUATOR DATE

Louis Dinovsky
SCREENER/EVALUATOR (PRINT)

[signature] 12-3-97
50.59 REVIEWER DATE

Regina Cunningham
50.59 REVIEWER (PRINT)

ACTION UNDER REVIEW: *(NAME/TITLE)*
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REVISION: 0

PROCEDURE/PCP/TEMPORARY MODIFICATION NO.:

QUESTION	RESPONSE JUSTIFICATION
	Introduction
	The REMP was designed to monitor the environs near the PVNGS using the guidance of the NRC Branch Technical Position (BTP) on environmental monitoring (Rev. 1, 1979). NUREG-1301, Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors, includes information which provides the latest version of guidance with respect to the REMP. Factors used in the program design are further delineated in the PVNGS Environmental Report - Operating License Stage (ER-OL), section 6.1.
	During 1997, it became necessary to move the transit control TLD and designate an existing TLD location as a second 'control' TLD. Since changes were being made in Tables 6-1 and 6-4, it was decided to make additional editorial changes in the language.
	Revision/Justification
	The transit control TLD (site #45) is used to determine the dose to a set of TLDs while in transit to and from their field locations. During the time that the TLDs are in the field, these transit control TLDs are stored in a lead pig. For the past several years this location has been a trailer at the APS Office in Buckeye. It was decided to move the storage location to a lead pig onsite since the trailer will no longer be in use. In order to evaluate how the change in storage locations would affect the TLDs, duplicate TLDs were placed in a lead pig in the Central Laboratory during the second and third quarters. The following table indicates the TLD comparison data which were used to justify relocating the transit control TLDs to the onsite location:

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QUESTION	RESPONSE JUSTIFICATION

Location	Second quarter result (uR/hr)	Third quarter result (uR/hr)
Buckeye lead pig	2.1	1.8
Onsite lead pig	2.2	1.7

The current baseline exposure rate for site #45 is 2.6 uR/hr. Based on these data, the baseline exposure rate for the new location will remain the same (2.6 uR/hr). Table 6-4 will be revised to change the location for TLD site #45 to the onsite Central Laboratory and reclassify this location as a supplemental TLD since it is not required by regulatory references. This will also decrease the total number of required TLD locations on Table 6-1 to 40 from 41. This parallels the guidance of NUREG-1301 for 40 locations.

The language in the Direct Radiation section of Table 6-1 was completely revised to parallel the language in NUREG-1301. This is editorial in nature.

Several places where distances are listed in kilometers on Tables 6-1 and 6-4 were edited to add estimated mileage information. Thses are also editorial in nature.

REMP maps (Figures 6-1 and 6-2) were updated to reflect any location changes.

1 NO The REMP is required to be performed by licensing basis documents. However, no aspect of the program could affect the facility since its function is to monitor the environs near PVNGS. All the changes are to ensure the ODCM correctly reflects the REMP and also meets the intent of environmental monitoring regulations. These changes do not make changes in any structures, systems, or components (SSCs), nor could they affect any SSCs of the facility as

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	described in licensing basis documents.
2	NO The proposed changes are to the REMP section of the ODCM. The ODCM is a licensing basis document which was developed using guidance from the BTP on environmental monitoring and NUREG-1301. Changes will not be made to procedures as described in these references, but the ODCM will more closely reflect the guidance as a result of the changes.
3	NO Revision of section 6 of the ODCM does not involve any tests or experiments. The purpose of the changes is to accurately describe the basis for the current monitoring program. In this process, no tests or experiments are carried out.
4	NO The technical specifications require the ODCM implementation (tech spec 6.8.1i., 6.8.1j., 6.8.4h.) but do not specifically describe how to perform the processes contained in the ODCM. No technical specification changes would be required as a result of the proposed changes.
	References:
	10CFR50, Appendix I, Section IV.B.3
	Tech Spec 6.8.1i., 6.8.1j., 6.8.4h, Amendments - 113(Unit 1) 106(Unit 2) 85(Unit 3)
	ODCM Section 6, Rev. 11
	BTP, Rev. 1, 1979
	UFSAR, Sections 3.1, 11.5, 12.3, 13.1, 6, 15, Rev. 8
	PVNGS ER-OL, Sections 2.3, 6.1
	US NRC Regulatory Guide 4.1, Rev. 1
	NUREG-1301