PILGRIM NUCLEAR POWER STATION

Facility Operating License DPR-35

Annual Radiological Environmental Operating Report

January 1 through December 31, 2019

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ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

JANUARY 01 THROUGH DECEMBER 31, 2019

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ENTERGY NUCLEAR
PILGRIM NUCLEAR POWER STATION
ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT
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INTRODUCTION

This report summarizes the results of the Entergy Nuclear Radiological Environmental Monitoring Program (REMP) conducted in the vicinity of Pilgrim Nuclear Power Station (PNPS) during the period from January 1 to December 31, 2019. This document has been prepared in accordance with the requirements of PNPS Technical Specifications section 5.6.2.

The REMP has been established to monitor the radiation and radioactivity released to the environment as a result of Pilgrim Station's operation. This program, initiated in August 1968, includes the collection, analysis, and evaluation of radiological data in order to assess the impact of Pilgrim Station on the environment and on the general public.

SAMPLING AND ANALYSIS

The environmental sampling media collected in the vicinity of PNPS and at distant locations include air particulate filters, charcoal cartridges, vegetation, seawater, sediment, Irish moss, shellfish, American lobster, and fishes.

During 2019, there were 1,191 samples collected from the atmospheric, aquatic, and terrestrial environments. In addition, 527 exposure measurements were obtained using environmental thermoluminescent dosimeters (TLDs).

A small number of inadvertent issues were encountered during 2019 in the collection of environmental samples in accordance with the PNPS Offsite Dose Calculation Manual (ODCM). Equipment failures and power outages resulted in a small number of instances in which lower than normal volumes were collected at the airborne sampling stations. 568 of 572 air particulate and 527 of 528 charcoal cartridges were collected and analyzed as required. Charcoal cartridge collection was discontinued in the beginning of December 2019 when Iodines had decayed away following the permant shutdown of PNPS on May 31, 2019. A full description of any discrepancies encountered with the environmental monitoring program is presented in Appendix D of this report.

There were 1,373 analyses performed on the environmental media samples. Analyses were performed by Teledyne Brown Engineering Laboratory in Knoxville, TN. Samples were analyzed as required by the PNPS ODCM.

LAND USE CENSUS

The annual land use census in the vicinity of Pilgrim Station was conducted as required by the PNPS ODCM between June 18, 2019. A total of 20 vegetable gardens having an area of more than 500 square feet were identified within five kilometers (three miles) of PNPS. No new milk or meat animals were located during the census. Of the 20 garden locations identified, samples were collected at or near two of the gardens as part of the environmental monitoring program. Other samples of natural vegetation were also collected in predicted high-deposition areas.

RADIOLOGICAL IMPACT TO THE ENVIRONMENT

During 2019, samples (except charcoal cartridges) collected as part of the REMP at Pilgrim Station continued to contain detectable amounts of naturally-occurring radioactive materials. No samples indicated any detectable radioactivity attributable to Pilgrim Station operations. Offsite ambient radiation measurements using environmental TLDs beyond the site boundary ranged between 42 and 83 milliRoentgens per year. The range of ambient radiation levels observed with the TLDs is consistent with natural background radiation levels for Massachusetts.

RADIOLOGICAL IMPACT TO THE GENERAL PUBLIC

During 2019, radiation doses to the general public as a result of Pilgrim Station's operation continued to be well below the federal limits and much less than the collective dose due to other sources of man-made (e.g., X-rays, medical, fallout) and naturally-occurring (e.g., cosmic, radon) radiation.

The calculated total body dose to the maximally exposed member of the general public from radioactive effluents and ambient radiation resulting from PNPS operations for 2019 was approximately 0.47 mrem for the year. This conservative estimate is well below the EPA's annual dose limit to any member of the general public and is a fraction of a percent of the typical dose received from natural and man-made radiation.

CONCLUSIONS

The 2019 Radiological Environmental Monitoring Program for Pilgrim Station resulted in the collection and analysis of hundreds of environmental samples and measurements. The data obtained were used to determine the impact of Pilgrim Station's operation on the environment and on the general public.

An evaluation of direct radiation measurements, environmental sample analyses, and dose calculations showed that all applicable federal criteria were met. Furthermore, radiation levels and resulting doses were a small fraction of those that are normally present due to natural and man-made background radiation.

Based on this information, there is no significant radiological impact on the environment or on the general public due to Pilgrim Station's operation.

1.0 INTRODUCTION

The Radiological Environmental Monitoring Program for 2019 performed by Entergy Nuclear Company for Pilgrim Nuclear Power Station (PNPS) is discussed in this report. Since the operation of a nuclear power plant results in the release of small amounts of radioactivity and low levels of radiation, the Nuclear Regulatory Commission (NRC) requires a program to be established to monitor radiation and radioactivity in the environment (Reference 1). This report, which is required to be published annually by Pilgrim Station's Technical Specifications section 5.6.2, summarizes the results of measurements of radiation and radioactivity in the environment in the vicinity of the Pilgrim Station and at distant locations during the period January 1 to December 31, 2019.

The Radiological Environmental Monitoring Program consists of taking radiation measurements and collecting samples from the environment, analyzing them for radioactivity content, and interpreting the results. With emphasis on the critical radiation exposure pathways to humans, samples from the aquatic, atmospheric, and terrestrial environments are collected. These samples include, but are not limited to: air, vegetation, seawater, sediment, Irish moss, shellfish, American lobster, and fish. Thermoluminescent dosimeters (TLDs) are placed in the environment to measure gamma radiation levels. The TLDs are processed and the environmental samples are analyzed to measure the very low levels of radiation and radioactivity present in the environment as a result of PNPS operation and other natural and man-made sources. These results are reviewed by PNPS's Chemistry staff and have been reported semiannually or annually to the Nuclear Regulatory Commission and others since 1972.

In order to more fully understand how a nuclear power plant impacts humans and the environment, background information on radiation and radioactivity, natural and man-made sources of radiation, reactor operations, radioactive effluent controls, and radiological impact on humans is provided. It is believed that this information will assist the reader in understanding the radiological impact on the environment and humans from the operation of Pilgrim Station.

1.1 Radiation and Radioactivity

All matter is made of atoms. An atom is the smallest part into which matter can be broken down and still maintain all its chemical properties. Nuclear radiation is energy, in the form of waves or particles that is given off by unstable, radioactive atoms.

Radioactive material exists naturally and has always been a part of our environment. The earth's crust, for example, contains radioactive uranium, radium, thorium, and potassium. Some radioactivity is a result of nuclear weapons testing. Examples of radioactive fallout that is normally present in environmental samples are cesium-137 and strontium-90. Some examples of radioactive materials released from a nuclear power plant are cesium-137, iodine-131, strontium-90, and cobalt-60.

Radiation is measured in units of millirem, much like temperature is measured in degrees. A millirem is a measure of the biological effect of the energy deposited in tissue. The natural and man-made radiation dose received in one year by the average American is approximately 620 mrem (References 2, 3, 4).

Radioactivity is measured in curies. A curie is that amount of radioactive material needed to produce 37,000,000,000 nuclear disintegrations per second. This is an extremely large amount of radioactivity in comparison to environmental radioactivity. That is why radioactivity in the environment is measured in picocuries. One picocurie is equal to one trillionth of a curie.

1.2 Sources of Radiation

As mentioned previously, naturally occurring radioactivity has always been a part of our environment. Table 1.2-1 shows the sources and doses of radiation from natural and man-made sources.

Table 1.2-1

Radiation Sources and Corresponding Doses (1)

NATURAL		MAN-MADE	
Source	Radiation Dose (millirem/year)	Source	Radiation Dose (millirem/year)
Internal, inhalation(2)	230	Medical(3)	300
External, space	30	Consumer(4)	12
Internal, ingestion	30	Industrial(5)	0.6
External, terrestrial	20	Occupational	0.6
		Weapons Fallout	< 1
		Nuclear Power Plants	< 1
Approximate Total	310	Approximate Total	315
Combined Annual Average Dose: Approximately 620 to 625 millirem/year			

(1) Information from NCRP Reports 160 and 94

(2) Primarily from airborne radon and its radioactive progeny

(3) Includes CT (150 millirem), nuclear medicine (74 mrem), interventional fluoroscopy (43 mrem) and conventional radiography and fluoroscopy (30 mrem)

(4) Primarily from cigarette smoking (4.6 mrem), commercial air travel (3.4 mrem), building materials (3.5 mrem), and mining and agriculture (0.8 mrem)

(5) Industrial, security, medical, educational, and research

Cosmic radiation from the sun and outer space penetrates the earth's atmosphere and continuously bombards us with rays and charged particles. Some of this cosmic radiation interacts with gases and particles in the atmosphere, making them radioactive in turn. These radioactive byproducts from cosmic ray bombardment are referred to as cosmogenic radionuclides. Isotopes such as beryllium-7 and carbon-14 are formed in this way. Exposure to cosmic and cosmogenic sources of radioactivity results in approximately 30 mrem of radiation dose per year.

Additionally, natural radioactivity is in our body and in the food we eat (approximately 30 millirem/yr), the ground we walk on (approximately 20 millirem/yr) and the air we breathe (approximately 230 millirem/yr). The majority of a person's annual dose results from exposure to radon and thoron in the air we breathe. These gases and their radioactive decay products arise from the decay of naturally occurring uranium, thorium and radium in the soil and building products such as brick, stone, and concrete. Radon and thoron levels vary greatly with location, primarily due to changes in the concentration of uranium and thorium in the soil. Residents at some locations in Colorado, New York, Pennsylvania, and New Jersey have a higher annual dose as a result of higher levels of radon/thoron gases in these areas. In total, these various sources of naturally-occurring radiation and radioactivity contribute to a total dose of approximately 310 mrem per year.

In addition to natural radiation, we are normally exposed to radiation from a number of man-made sources. The single largest doses from man-made sources result from therapeutic and diagnostic applications of x-rays and radiopharmaceuticals. The annual dose to an individual in the U.S. from medical and dental exposure is approximately 300 mrem. Consumer activities, such as smoking, commercial air travel, and building materials contribute approximately 13 mrem/yr. Much smaller doses result from weapons fallout (less than 1 mrem/yr) and nuclear power plants. Typically, the average person in the United States receives approximately 314 mrem per year from man-made sources. The collective dose from naturally-occurring and man-made sources results in a total dose of approximately 620 mrem/yr to the average American.

1.3 Nuclear Reactor Operations

Pilgrim Station generates approximately 700 megawatts of electricity at full power, which is enough electricity to supply the entire city of Boston, Massachusetts. Pilgrim Station is a boiling water reactor whose nuclear steam supply system was provided by General Electric Co. The nuclear station is located on a 1600-acre site approximately eight kilometers (five miles) east-southeast of the downtown area of Plymouth, Massachusetts. Commercial operation began in December 1972.

Pilgrim Station was operational for less half of 2019 due to the decision to permentantly shut down and decommission the station. Elevated intake temperatures and condenser performance effected power during the June resulting in lower power levels. The resulting monthly capacity factors are presented in Table 1.3-1.

TABLE 1.3-1

PNPS OPERATING CAPACITY FACTOR DURING 2019
(Based on rated reactor thermal power of 2028 Megawatts-Thermal)

Month	Percent Capacity
January	89.8%
February	99.7%
March	97.7%
April	98.4%
May	63.7%
June	0.00%
July	0.00%
August	0.00%
September	0.00%
October	0.00%
November	0.00%
December	0.00%
Annual Average	37.4%

Nuclear-generated electricity was produced at Pilgrim Station by many of the same techniques used for conventional oil and coal-generated electricity. Both systems use heat to boil water to produce steam. The steam turns a turbine, which turns a generator, producing electricity. In both cases, the steam passes through a condenser where it changes back into water and recirculates back through the system. The cooling water source for Pilgrim Station is the Cape Cod Bay.

The key difference between Pilgrim's nuclear power and conventional power is the source of heat used to boil the water. Conventional plants burn fossil fuels in a boiler, while nuclear plants make use of uranium in a nuclear reactor.

Inside the reactor, a nuclear reaction called fission takes place. Particles, called neutrons, strike the nucleus of a uranium-235 atom, causing it to split into fragments called radioactive fission products. The splitting of the atoms releases both heat and more neutrons. The newly-released neutrons then collide with and split other uranium atoms, thus making more heat and releasing even more neutrons, and on and on until the uranium fuel is depleted or spent. This process is called a chain reaction.

The operation of a nuclear reactor results in the release of small amounts of radioactivity and low levels of radiation. The radioactivity originates from two major sources, radioactive fission products and radioactive activation products.

Radioactive fission products, as illustrated in Figure 1.3-1 (Reference 5), originate from the fissioning of the nuclear fuel. These fission products get into the reactor coolant from their release by minute amounts of uranium on the outside surfaces of the fuel cladding, by diffusion through the fuel pellets and cladding and, on occasion, through defects or failures in the fuel cladding. These fission products circulate along with the reactor coolant water and will deposit on the internal surfaces of pipes and equipment. The radioactive fission products on the pipes and equipment emit radiation. Examples of some fission products are krypton-85 (Kr-85), strontium-90 (Sr-90), iodine-131 (I-131), xenon-133 (Xe-133), and cesium-137 (Cs-137).

Nuclear Fission

Fission is the splitting of the uranium-235 atom by a neutron to release heat and more neutrons, creating a chain reaction. Radiation and fission products are by-products of the process.

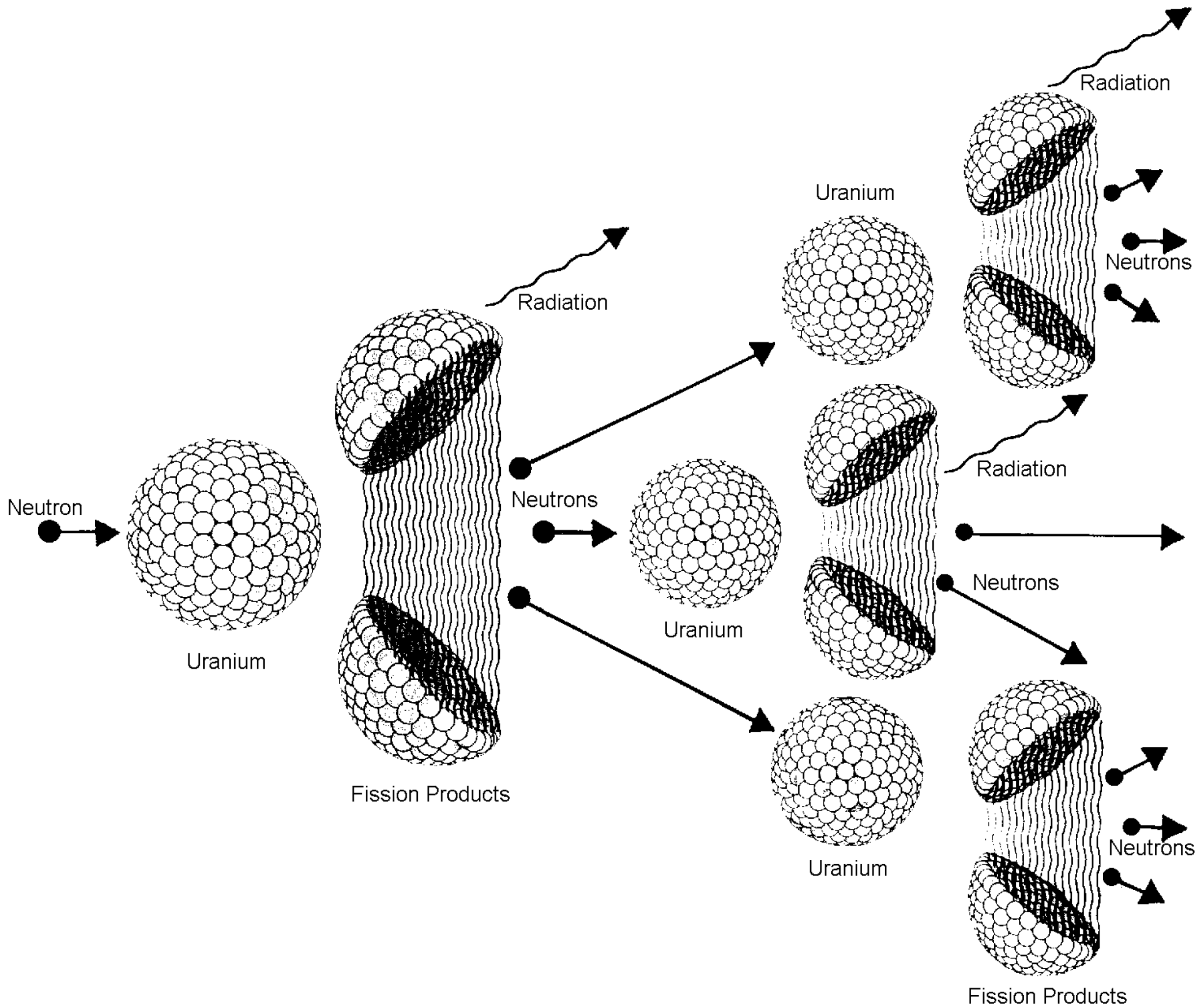


Figure 1.3-1
Radioactive Fission Product Formation

Radioactive activation products (see Figure 1.3-2), on the other hand, originate from two sources. The first is by neutron bombardment of the hydrogen, oxygen and other gas (helium, argon, nitrogen) molecules in the reactor cooling water. The second is a result of the fact that the internals of any piping system or component are subject to minute yet constant corrosion from the reactor cooling water. These minute metallic particles (for example: nickel, iron, cobalt, or magnesium) are transported through the reactor core into the fuel region, where neutrons may react with the nuclei of these particles, producing radioactive products. So, activation products are nothing more than ordinary naturally-occurring atoms that are made unstable or radioactive by neutron bombardment. These activation products circulate along with the reactor coolant water and will deposit on the internal surfaces of pipes and equipment. The radioactive activation products on the pipes and equipment emit radiation. Examples of some activation products are manganese-54 (Mn-54), iron-59 (Fe-59), cobalt-60 (Co-60), and zinc-65 (Zn-65).

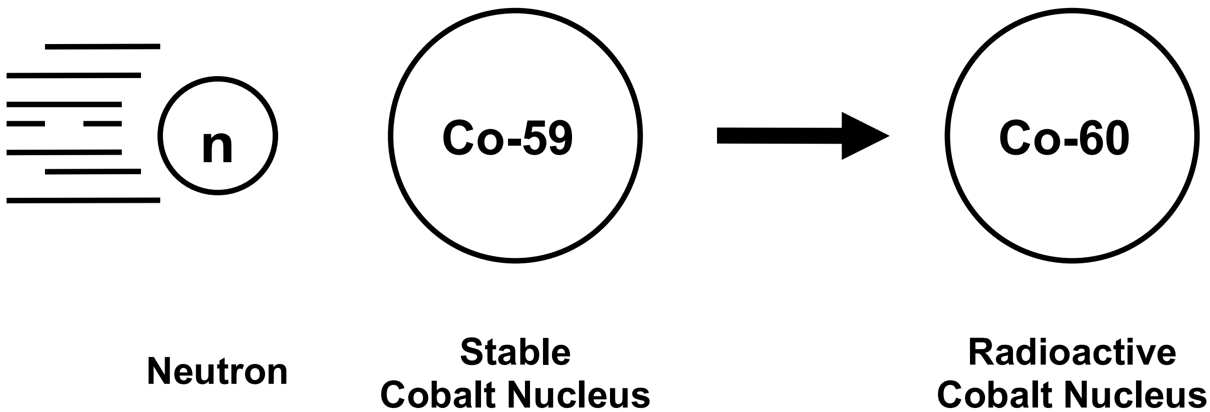


Figure 1.3-2
Radioactive Activation Product Formation

At Pilgrim Nuclear Power Station there are five independent protective barriers that confine these radioactive materials. These five barriers, which are shown in Figure 1.3-3 (Reference 5), are:

- fuel pellets;
- fuel cladding;
- reactor vessel and piping;
- primary containment (drywell and torus); and,
- secondary containment (reactor building).

SIMPLIFIED DIAGRAM OF A BOILING WATER REACTOR

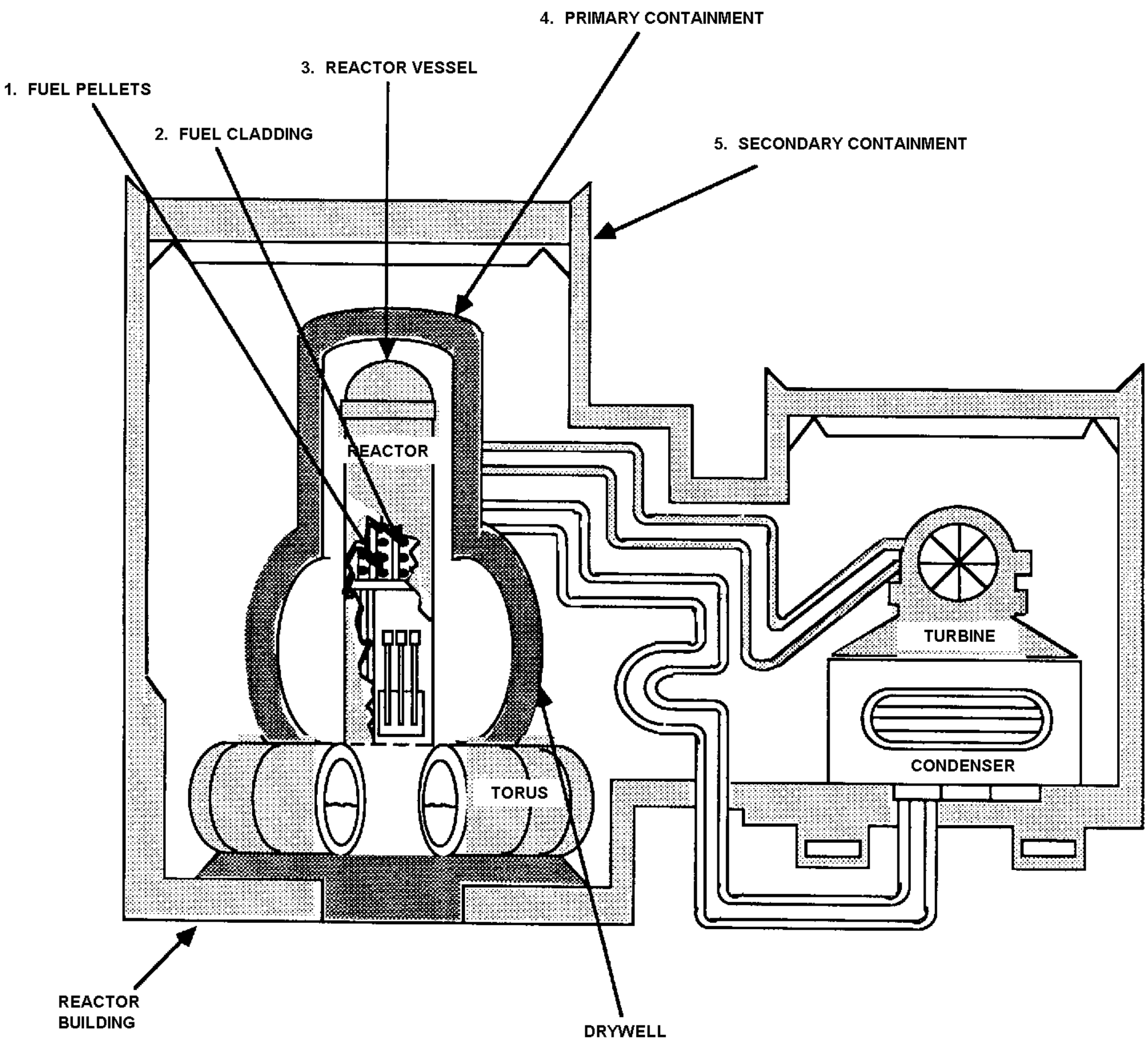


Figure 1.3-3
Barriers To Confine Radioactive Materials

The ceramic uranium fuel pellets provide the first barrier. Most of the radioactive fission products are either physically trapped or chemically bound between the uranium atoms, where they will remain. However, a few fission products that are volatile or gaseous may diffuse through the fuel pellets into small gaps between the pellets and the fuel cladding.

The second barrier, the fuel cladding, consists of zirconium alloy tubes that confine the fuel pellets. The small gaps between the fuel and the cladding contain the noble gases and volatile iodines that are types of radioactive fission products. This radioactivity can diffuse to a small extent through the fuel cladding into the reactor coolant water.

The third barrier consists of the reactor pressure vessel, steel piping and equipment that confine the reactor cooling water. The reactor pressure vessel, which holds the reactor fuel, is a 65-foot high by 19-foot diameter tank with steel walls approximately nine inches thick. This provides containment for radioactivity in the primary coolant and the reactor core. However, during the course of operations and maintenance, small amounts of radioactive fission and activation products can escape through valve leaks or upon breaching of the primary coolant system for maintenance.

The fourth barrier is the primary containment. This consists of the drywell and the torus. The drywell is a steel lined enclosure that is shaped like an inverted light bulb. An approximately five foot thick concrete wall encloses the drywell's steel pressure vessel. The torus is a donut-shaped pressure suppression chamber. The steel walls of the torus are nine feet in diameter with the donut itself having an outside diameter of approximately 130 feet. Small amounts of radioactivity may be released from primary containment during maintenance.

The fifth barrier is the secondary containment or reactor building. The reactor building is the concrete building that surrounds the primary containment. This barrier is an additional safety feature to contain radioactivity that may escape from the primary containment. This reactor building is equipped with a filtered ventilation system that is used when needed to reduce the radioactivity that escapes from the primary containment.

The five barriers confine most of the radioactive fission and activation products. However, small amounts of radioactivity do escape via mechanical failures and maintenance on valves, piping, and equipment associated with the reactor cooling water system. The small amounts of radioactive liquids and gases that do escape the various containment systems are further controlled by the liquid purification and ventilation filtration systems. Also, prior to a release to the environment, control systems exist to collect and purify the radioactive effluents in order to reduce releases to the environment to as low as is reasonably achievable. The control of radioactive effluents at Pilgrim Station will be discussed in more detail in the next section.

1.4 Radioactive Effluent Control

The small amounts of radioactive liquids and gases that might escape the five barriers are purified in the liquid and gaseous waste treatment systems, then monitored for radioactivity, and released only if the radioactivity levels are below the federal release limits.

Radioactivity released from the liquid effluent system to the environment is limited, controlled, and monitored by a variety of systems and procedures which include:

- reactor water cleanup system;
- liquid radwaste treatment system;
- sampling and analysis of the liquid radwaste tanks; and,
- liquid waste effluent discharge header radioactivity monitor.

The purpose of the reactor water cleanup system is to continuously purify the reactor cooling water by removing radioactive atoms and non-radioactive impurities that may become activated by neutron bombardment. A portion of the reactor coolant water is diverted from the primary coolant system and is directed through ion exchange resins where radioactive elements, dissolved and suspended in the water, are removed through chemical processes. The net effect is a substantial reduction of the radioactive material that is present in the primary coolant water and consequently the amount of radioactive material that might escape from the system.

Reactor cooling water that might escape the primary cooling system and other radioactive water sources are collected in floor and equipment drains. These drains direct this radioactive liquid waste to large holdup tanks. The liquid waste collected in the tanks is purified again using the liquid radwaste treatment system, which consists of a filter and ion exchange resins.

Processing of liquid radioactive waste results in large reductions of radioactive liquids discharged into Cape Cod Bay. Of all wastes processed through liquid radwaste treatment, 90 to 95 percent of all wastes are purified and the processed liquid is re-used in plant systems.

Prior to release, the radioactivity in the liquid radwaste tank is sampled and analyzed to determine if the level of radioactivity is below the release limits and to quantify the total amount of radioactive liquid effluent that would be released. If the levels are below the federal release limits, the tank is drained to the liquid effluent discharge header.

This liquid waste effluent discharge header is provided with a shielded radioactivity monitor. This detector is connected to a radiation level meter and a strip chart recorder in the Control Room. The radiation alarm is set so that the detector will alarm before radioactivity levels exceed the release limits. The liquid effluent discharge header has an isolation valve. If an alarm is received, the liquid effluent discharge valve will automatically close, thereby terminating the release to the Cape Cod Bay and preventing any liquid radioactivity from being released that may exceed the release limits. An audible alarm notifies the Control Room operator that this has occurred.

Some liquid waste sources which have a low potential for containing radioactivity, and/or may contain very low levels of contamination, may be discharged directly to the discharge canal without passing through the liquid radwaste discharge header. One such source of liquids is the neutralizing sump. However, prior to discharging such liquid wastes, the tank is thoroughly mixed and a representative sample is collected for analysis of radioactivity content prior to being discharged.

Another means for adjusting liquid effluent concentrations to below federal limits is by mixing plant cooling water from the condenser with the liquid effluents in the discharge canal. This larger volume of cooling water further dilutes the radioactivity levels far below the release limits.

The preceding discussion illustrates that many controls exist to reduce the radioactive liquid effluents released to the Cape Cod Bay to as far below the release limits as is reasonably achievable.

Radioactive releases from the radioactive gaseous effluent system to the environment are limited, controlled, and monitored by a variety of systems and procedures which include:

- reactor building ventilation system;
- reactor building vent effluent radioactivity monitor;
- sampling and analysis of reactor building vent effluents;
- standby gas treatment system;
- main stack effluent radioactivity monitor and sampling;
- sampling and analysis of main stack effluents;
- augmented off-gas system;
- steam jet air ejector (SJAE) monitor; and,
- off-gas radiation monitor.

The purpose of the reactor building ventilation system is to collect and exhaust reactor building air. Air collected from contaminated areas is filtered prior to combining it with air collected from other parts of the building. This combined airflow is then directed to the reactor building ventilation plenum that is located on the side of the reactor building. This plenum, which vents to the atmosphere, is equipped with a radiation detector. The radiation level meter and strip chart recorder for the reactor building vent effluent radioactivity monitor is located in the Control Room. To supplement the information continuously provided by the detector, air samples are taken periodically from the reactor building vent and are analyzed to quantify the total amount of tritium and radioactive gaseous and particulate effluents released.

If air containing elevated amounts of noble gases is routed past the reactor building vent's effluent radioactivity monitor, an alarm will alert the Control Room operators that release limits are being approached. The Control Room operators, according to procedure, will isolate the reactor building ventilation system and initiate the standby gas treatment system to remove airborne particulates and gaseous halogen radioactivity from the reactor building exhaust. This filtration assembly consists of high-efficiency particulate air filters and charcoal adsorber beds. The purified air is then directed to the main stack. The main stack has dilution flow that further reduces concentration levels of gaseous releases to the environment to as far below the release limits as is reasonably achievable.

The approximately 335 foot tall main stack has a special probe inside it that withdraws a portion of the air and passes it through a radioactivity monitoring system. This main stack effluent radioactivity monitoring system continuously samples radioactive particulates, iodines, and noble gases. Grab samples for tritium analysis are also collected at this location. The system also contains radioactivity detectors that monitor the levels of radioactive noble gases in the stack flow and display the result on radiation level meters and strip chart recorders located in the Control Room. To supplement the information continuously provided by the detectors, the particulate, iodine, tritium, and gas samples are analyzed periodically to quantify the total amount of radioactive gaseous effluent being released.

The purpose of the augmented off-gas system is to reduce the radioactivity from the gases that are removed from the condenser. This purification system consists of two 30-minute holdup lines to reduce the radioactive gases with short half-lives, several charcoal adsorbers to remove radioactive iodines and further retard the short half-life gases, and offgas filters to remove radioactive particulates. The recombiner collects free hydrogen and oxygen gas and recombines them into water. This helps reduce the gaseous releases of short-lived isotopes of oxygen that have been made radioactive by neutron activation.

The radioactive off-gas from the condenser is then directed into a ventilation pipe to which the off-gas radiation monitors are attached. The radiation level meters and strip chart recorders for this detector are also located in the Control Room. If a radiation alarm setpoint is exceeded, an audible alarm will sound to alert the Control Room operators. In addition, the off-gas bypass and charcoal adsorber inlet valve will automatically re-direct the off-gas into the charcoal adsorbers if they are temporarily being bypassed. If the radioactivity levels are not returned to below the alarm setpoint within 13 minutes, the off-gas releases will be automatically isolated, thereby preventing any gaseous radioactivity from being released that may exceed the release limits.

Therefore, for both liquid and gaseous releases, radioactive effluent control systems exist to collect and purify the radioactive effluents in order to reduce releases to the environment to as low as is reasonably achievable. The effluents are always monitored, sampled and analyzed prior to release to make sure that radioactivity levels are below the release limits. If the release limits are being approached, isolation valves in some of the waste effluent lines will automatically shut to stop the release, or Control Room operators will implement procedures to ensure that federal regulatory limits are always met.

1.5 Radiological Impact on Humans

The final step in the effluent control process is the determination of the radiological dose impact to humans and comparison with the federal dose limits to the public. As mentioned previously, the purpose of continuous radiation monitoring and periodic sampling and analysis is to measure the quantities of radioactivity being released to determine compliance with the radioactivity release limits. This is the first stage for assessing releases to the environment.

Next, calculations of the dose impact to the general public from Pilgrim Station's radioactive effluents are performed. The purpose of these calculations is to periodically assess the doses to the general public resulting from radioactive effluents to ensure that these doses are being maintained as far below the federal dose limits as is reasonably achievable. This is the second stage for assessing releases to the environment.

The types and quantities of radioactive liquid and gaseous effluents released from Pilgrim Station during each given year are reported to the Nuclear Regulatory Commission annually. The 2019 Radioactive Effluents are provided in Appendix B and will be discussed in more detail in Section 3 of this report. These liquid and gaseous effluents were well below the federal release limits and were a small percentage of the PNPS ODCM effluent control limits.

These measurements of the physical and chemical nature of the effluents are used to determine how the radionuclides will interact with the environment and how they can result in radiation exposure to humans. The environmental interaction mechanisms depend upon factors such as the hydrological (water) and meteorological (atmospheric) characteristics in the area. Information on the water flow, wind speed, wind direction, and atmospheric mixing characteristics are used to estimate how radioactivity will distribute and disperse in the ocean and the atmosphere.

The most important type of information that is used to evaluate the radiological impact on humans is data on the use of the environment. Information on fish and shellfish consumption, boating usage, beach usage, locations of cows and goats, locations of residences, locations of gardens, drinking water supplies, and other usage information are utilized to estimate the amount of radiation and radioactivity received by the general public.

The radiation exposure pathway to humans is the path radioactivity takes from its release point at Pilgrim Station to its effect on man. The movement of radioactivity through the environment and its transport to humans is portrayed in Figure 1.5-1.

EXAMPLES OF PILGRIM STATION'S RADIATION EXPOSURE PATHWAYS

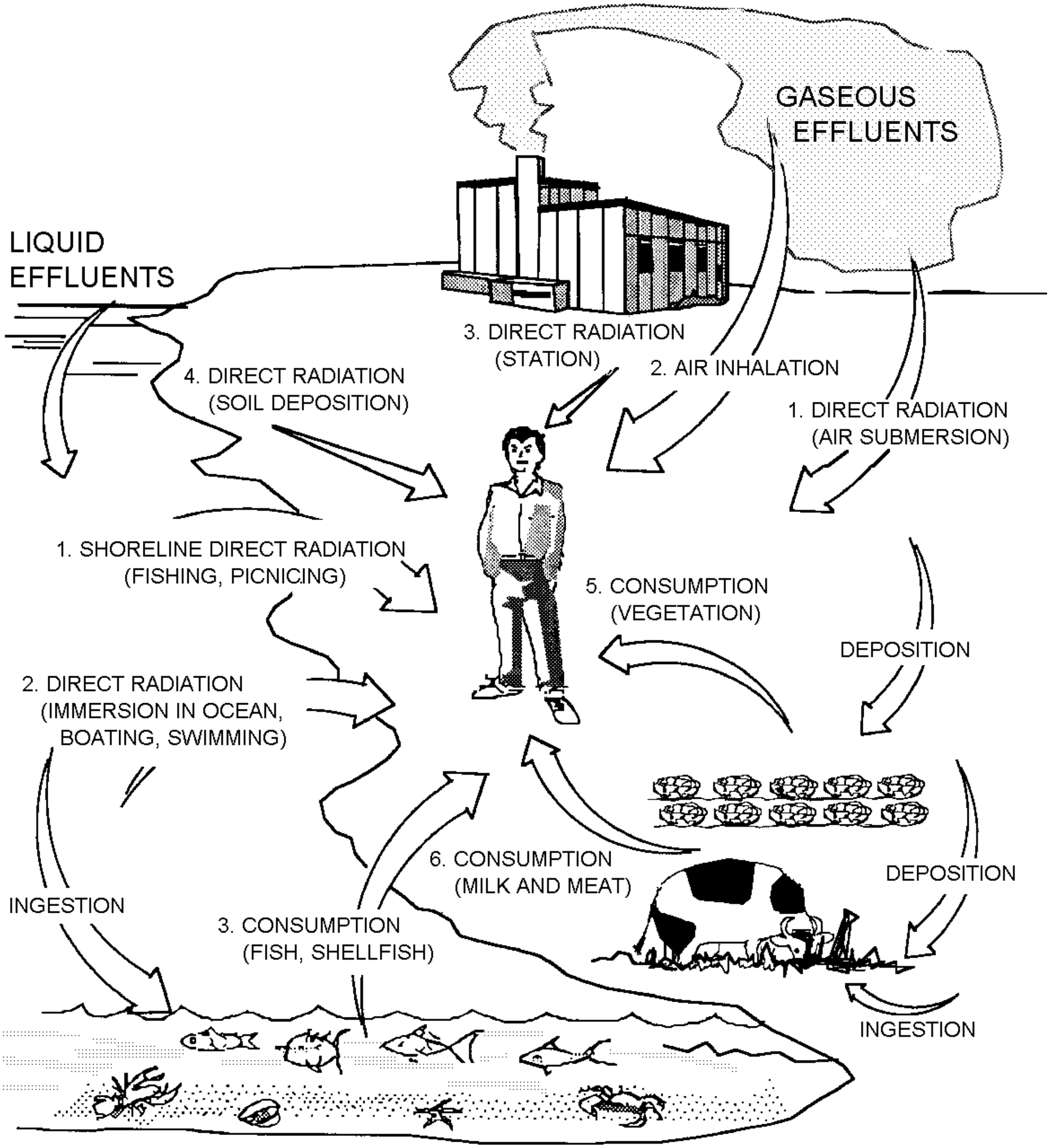


Figure 1.5-1
Radiation Exposure Pathways

There are three major ways in which liquid effluents affect humans:

- external radiation from liquid effluents that deposit and accumulate on the shoreline;
- external radiation from immersion in ocean water containing radioactive liquids; and,
- internal radiation from consumption of fish and shellfish containing radioactivity absorbed from the liquid effluents.

There are six major ways in which gaseous effluents affect humans:

- external radiation from an airborne plume of radioactivity;
- internal radiation from inhalation of airborne radioactivity;
- external radiation from deposition of radioactive effluents on soil;
- ambient (direct) radiation from contained sources at the power plant;
- internal radiation from consumption of vegetation containing radioactivity deposited on vegetation or absorbed from the soil due to ground deposition of radioactive effluents; and,
- internal radiation from consumption of milk and meat containing radioactivity deposited on forage that is eaten by cattle and other livestock.

In addition, ambient (direct) radiation emitted from contained sources of radioactivity at PNPS contributes to radiation exposure in the vicinity of the plant. Radioactive nitrogen-16 contained in the steam flowing through the turbine accounts for the majority of this “sky shine” radiation exposure immediately adjacent to the plant. Smaller amounts of ambient radiation result from low-level radioactive waste stored at the site prior to shipping and disposal.

To the extent possible, the radiological dose impact on humans is based on direct measurements of radiation and radioactivity in the environment. When PNPS-related activity is detected in samples that represent a plausible exposure pathway, the resulting dose from such exposure is assessed (see Appendix A). However, the operation of Pilgrim Nuclear Power Station results in releases of only small amounts of radioactivity, and, as a result of dilution in the atmosphere and ocean, even the most sensitive radioactivity measurement and analysis techniques cannot usually detect these tiny amounts of radioactivity above that which is naturally present in the environment. Therefore, radiation doses are calculated using radioactive effluent release data and computerized dose calculations that are based on very conservative NRC-recommended models that tend to result in over-estimates of resulting dose. These computerized dose calculations are performed by or for Entergy Nuclear personnel. These computer codes use the guidelines and methodology set forth by the NRC in Regulatory Guide 1.109 (Reference 6). The dose calculations are documented and described in detail in the Pilgrim Nuclear Power Station's Offsite Dose Calculation Manual (Reference 7), which has been reviewed by the NRC.

Monthly dose calculations are performed by PNPS personnel. It should be emphasized that because of the very conservative assumptions made in the computer code calculations, the maximum hypothetical dose to an individual is considerably higher than the dose that would actually be received by a real individual.

After dose calculations are performed, the results are compared to the federal dose limits for the public. The two federal agencies that are charged with the responsibility of protecting the public from radiation and radioactivity are the Nuclear Regulatory Commission (NRC) and the Environmental Protection Agency (EPA).

The NRC, in 10CFR 20.1301 (Reference 8) limits the levels of radiation to unrestricted areas resulting from the possession or use of radioactive materials such that they limit any individual to a dose of:

- less than or equal to 100 mrem per year to the total body.

In addition to this dose limit, the NRC has established design objectives for nuclear plant licensees. Conformance to these guidelines ensures that nuclear power reactor effluents are maintained as far below the legal limits as is reasonably achievable.

The NRC, in 10CFR 50 Appendix I (Reference 9) establishes design objectives for the dose to a member of the general public from radioactive material in liquid effluents released to unrestricted areas to be limited to:

- less than or equal to 3 mrem per year to the total body; and,
- less than or equal to 10 mrem per year to any organ.

The air dose due to release of noble gases in gaseous effluents is restricted to:

- less than or equal to 10 mrad per year for gamma radiation; and,
- less than or equal to 20 mrad per year for beta radiation.

The dose to a member of the general public from iodine-131, tritium, and all particulate radionuclides with half-lives greater than 8 days in gaseous effluents is limited to:

- less than or equal to 15 mrem per year to any organ.

The EPA, in 40CFR190.10 Subpart B (Reference 10), sets forth the environmental standards for the uranium fuel cycle. During normal operation, the annual dose to any member of the public from the entire uranium fuel cycle shall be limited to:

- less than or equal to 25 mrem per year to the total body;
- less than or equal to 75 mrem per year to the thyroid; and,
- less than or equal to 25 mrem per year to any other organ.

The summary of the 2019 radiological impact for Pilgrim Station and comparison with the EPA dose limits and guidelines, as well as a comparison with natural/man-made radiation levels, is presented in Section 3 of this report.

The third stage of assessing releases to the environment is the Radiological Environmental Monitoring Program (REMP). The description and results of the REMP at Pilgrim Nuclear Power Station during 2019 is discussed in Section 2 of this report.

2.0 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

2.1 Pre-Operational Monitoring Results

The Radiological Environmental Monitoring Program (REMP) at Pilgrim Nuclear Power Station was first initiated in August 1968, in the form of a pre-operational monitoring program prior to bringing the station on-line. The NRC's intent (Reference 11) with performing a pre-operational environmental monitoring program is to:

- measure background levels and their variations in the environment in the area surrounding the licensee's station; and,
- evaluate procedures, equipment, and techniques for monitoring radiation and radioactivity in the environment.

The pre-operational program (Reference 12) continued for approximately three and a half years, from August 1968 to June 1972. Examples of background radiation and radioactivity levels measured during this time period are as follows:

- Airborne Radioactivity Particulate Concentration (gross beta): 0.02 - 1.11 pCi/m^3;
- Ambient Radiation (TLDs): 4.2 - 22 micro-R/hr (37 - 190 mR/yr);
- Seawater Radioactivity Concentrations (gross beta): 12 - 31 pCi/liter;
- Fish Radioactivity Concentrations (gross beta): 2,200 - 11,300 pCi/kg;
- Milk Radioactive Cesium-137 Concentrations: 9.3 - 32 pCi/liter;
- Milk Radioactive Strontium-90 Concentrations: 4.7 - 17.6 pCi/liter;
- Cranberries Radioactive Cesium-137 Concentrations: 140 - 450 pCi/kg;
- Forage Radioactive Cesium-137 Concentrations: 150 - 290 pCi/kg.

This information from the pre-operational phase is used as a basis for evaluating changes in radiation and radioactivity levels in the vicinity of the plant following plant operation. In April 1972, just prior to initial reactor startup (June 12, 1972), Boston Edison Company implemented a comprehensive operational environmental monitoring program at Pilgrim Nuclear Power Station. This program (Reference 13) provides information on radioactivity and radiation levels in the environment for the purpose of:

- demonstrating that doses to the general public and levels of radioactivity in the environment are within established limits and legal requirements;
- monitoring the transfer and long-term buildup of specific radionuclides in the environment to revise the monitoring program and environmental models in response to changing conditions;
- checking the condition of the station's operation, the adequacy of operation in relation to the adequacy of containment, and the effectiveness of effluent treatment so as to provide a mechanism of determining unusual or unforeseen conditions and, where appropriate, to trigger special environmental monitoring studies;
- assessing the dose equivalent to the general public and the behavior of radioactivity released during the unlikely event of an accidental release; and,

- determining whether or not the radiological impact on the environment and humans is significant.

The Nuclear Regulatory Commission requires that Pilgrim Station provide monitoring of the plant environs for radioactivity that will be released as a result of normal operations, including anticipated operational occurrences, and from postulated accidents. The NRC has established guidelines (Reference 14) that specify an acceptable monitoring program. The PNPS Radiological Environmental Monitoring Program was designed to meet and exceed these guidelines. Guidance contained in the NRC's Radiological Assessment Branch Technical Position on Environmental Monitoring (Reference 15) has been used to improve the program. In addition, the program has incorporated the provisions of an agreement made with the Massachusetts Wildlife Federation (Reference 16). The program was supplemented by including improved analysis of shellfish and sediment at substantially higher sensitivity levels to verify the adequacy of effluent controls at Pilgrim Station.

2.2 Environmental Monitoring Locations

Sampling locations have been established by considering meteorology, population distribution, hydrology, and land use characteristics of the Plymouth area. The sampling locations are divided into two classes, indicator and control. Indicator locations are those that are expected to show effects from PNPS operations, if any exist. These locations were primarily selected on the basis of where the highest predicted environmental concentrations would occur. While the indicator locations are typically within a few kilometers of the plant, the control stations are generally located so as to be outside the influence of Pilgrim Station. They provide a basis on which to evaluate fluctuations at indicator locations relative to natural background radiation and natural radioactivity and fallout from prior nuclear weapons tests.

The environmental sampling media collected in the vicinity of Pilgrim Station during 2019 included air particulate filters, charcoal cartridges, vegetation, seawater, sediment, Irish moss, shellfish, American lobster, and fishes. The sampling medium, station description, station number, distance, and direction for indicator and control samples are listed in Table 2.2-1. These sampling locations are also displayed on the maps shown in Figures 2.2-1 through 2.2-6.

The radiation monitoring locations for the environmental TLDs are shown in Figures 2.2-1 through 2.2-4. The frequency of collection and types of radioactivity analysis are described in Pilgrim Station's ODCM, Sections 3/4.5.

The land-based (terrestrial) samples, seawater, and monitoring devices are collected by station personnel. The aquatic samples are collected by Normandeau Associates, Inc. The radioactivity analysis of samples are performed by the Teledyne Brown Engineering Laboratory, and the environmental dosimeters are analyzed by Stanford Dosimetry.

The frequency, types, minimum number of samples, and maximum lower limits of detection (LLD) for the analytical measurements, are specified in the PNPS ODCM. During 2003, a revision was made to the PNPS ODCM to standardize it to the model program described in NUREG-1302 (Reference 14) and the Branch Technical Position of 1979 (Reference 15). In accordance with this standardization, a number of changes occurred regarding the types and frequencies of sample collections.

In regard to terrestrial REMP sampling, routine collection and analysis of soil samples was discontinued in lieu of the extensive network of environmental TLDs around PNPS, and the weekly collection of air samples at 11 locations. Such TLD monitoring and air sampling would provide an early indication of any potential deposition of radioactivity, and follow-up soil sampling could be performed on an as-needed basis. Also, with the loss of the indicator milk sample at the Plymouth County Farm and the lack of a sufficient substitute location that could provide suitable volumes for analysis, it was deemed unnecessary to continue to collect and analyze control samples of milk. Consequently, routine milk sampling was also dropped from the terrestrial sampling program. NRC guidance (Reference 14) contains provisions for collection of vegetation in lieu of milk sampling. Such samples have historically been collected near Pilgrim Station as part of the routine REMP program.

In the area of marine sampling, a number of the specialized sampling and analysis requirements implemented as part of the Agreement with the Massachusetts Wildlife Federation (Reference 16) for licensing of a second reactor at PNPS were dropped. This agreement, made in 1977, was predicated on the construction of a second nuclear unit, and was set to expire in 1987. However, since the specialized requirements were incorporated into the PNPS Technical Specifications at the time, the requirements were continued. When the ODCM was revised in 1999 in accordance with NRC Generic Letter 89-01, the sampling program description was relocated to the ODCM. When steps were taken in 2003 to standardize the PNPS ODCM to the NUREG-1302 model, the specialized marine sampling requirements were changed to those of the model program. These changes include the following:

- A sample of the surface layer of sediment is collected, as opposed to specialized depth-incremental sampling to 30 cm and subdividing cores into 2 cm increments.
- Standard LLD levels of approximately 150 to 180 pCi/kg were established for sediment, as opposed to the specialized LLDs of 50 pCi/kg.
- Specialized analysis of sediment for plutonium isotopes was removed.
- Sampling of Irish moss, shellfish, and fish was rescheduled to a semiannual period, as opposed to a specialized quarterly sampling interval.
- Analysis of only the edible portions of shellfish (mussels and clams), as opposed to specialized additional analysis of the shell portions.
- Standard LLD levels of 130 to 260 pCi/kg were established for edible portions of shellfish, as opposed to specialized LLDs of 5 pCi/kg.

Upon receipt of the analysis results from the analytical laboratories, the PNPS staff reviews the results. If the radioactivity concentrations are above the reporting levels, the NRC must be notified within 30 days. For radioactivity that is detected that is attributable to Pilgrim Station's operation, calculations are performed to determine the cumulative dose contribution for the current year. Depending upon the circumstances, a special study may also be completed (see Appendix A for 2019 special studies). Most importantly, if radioactivity levels in the environment become elevated as a result of the station's operation, an investigation is performed and corrective actions are recommended to reduce the amount of radioactivity to as far below the legal limits as is reasonably achievable.

The radiological environmental sampling locations are reviewed annually, and modified if necessary. A garden and milk animal census is performed every year to identify changes in the use of the environment in the vicinity of the station to permit modification of the monitoring and sampling locations. The results of the 2019 Garden and Milk Animal Census are reported in Appendix C.

The accuracy of the data obtained through Pilgrim Station’s Radiological Environmental Monitoring Program is ensured through a comprehensive Quality Assurance (QA) programs. PNPS's QA program has been established to ensure confidence in the measurements and results of the radiological monitoring program through:

- Regular surveillances of the sampling and monitoring program;
- An annual audit of the analytical laboratory by the sponsor companies;
- Participation in cross-check programs;
- Use of blind duplicates for comparing separate analyses of the same sample; and,
- Spiked sample analyses by the analytical laboratory.

QA audits and inspections of the Radiological Environmental Monitoring Program are performed by the NRC, American Nuclear Insurers, and by the PNPS Quality Assurance Department.

The Teledyne Brown Engineering Laboratory conducts extensive quality assurance and quality control programs. The 2019 results of these programs are summarized in Appendix E. These results indicate that the analyses and measurements performed during 2019 exhibited acceptable precision and accuracy.

2.3 Interpretation of Radioactivity Analyses Results

The following pages summarize the analytical results of the environmental samples collected during 2019. Data for each environmental medium are included in a separate section. A table that summarizes the year's data for each type of medium follows a discussion of the sampling program and results. The unit of measurement for each medium is listed at the top of each table. The left hand column contains the radionuclides being reported, total number of analyses of that radionuclide, and the number of measurements that exceed ten times the yearly average for the control station(s). The latter are classified as "non-routine" measurements. The next column lists the Lower Limit of Detection (LLD) for those radionuclides that have detection capability requirements specified in the PNPS ODCM.

Those sampling stations within the range of influence of Pilgrim Station and which could conceivably be affected by its operation are called "indicator" stations. Distant stations, which are beyond plant influence, are called "control" stations. Ambient radiation monitoring stations are broken down into four separate zones to aid in data analysis.

For each sampling medium, each radionuclide is presented with a set of statistical parameters. This set of statistical parameters includes separate analyses for (1) the indicator stations, (2) the station having the highest annual mean concentration, and (3) the control stations. For each of these three groups of data, the following values are calculated:

- The mean value of detectable concentrations, including only those values above LLD;
- The standard deviation of the detectable measurements;
- The lowest and highest concentrations; and,
- The number of measurements with results greater than the Minimum Detectable Activity (activity which is three times greater than the standard deviation), out of the total number of measurements.

Each single radioactivity measurement datum is based on a single measurement and is reported as a concentration plus or minus one standard deviation. The quoted uncertainty represents only the random uncertainty associated with the measurement of the radioactive decay process (counting statistics), and not the propagation of all possible uncertainties in the sampling and analysis process. A sample or measurement is considered to contain detectable radioactivity if the measured value (e.g., concentration) exceeds three times its associated standard deviation. For example, a vegetation sample with a cesium-137 concentration of 85 ± 21 pCi/kilogram would be considered "positive" (detectable Cs-137), whereas another sample with a concentration of 60 ± 32 pCi/kilogram would be considered "negative", indicating no detectable cesium-137. The latter sample may actually contain cesium-137, but the levels counted during its analysis were not significantly different than the background levels.

The analytical laboratory that analyzes the various REMP samples employs a background subtraction correction for each analysis. A blank sample that is known not to contain any plant-related activity is analyzed for radioactivity, and the count rate for that analysis is used as the background correction. That background correction is then subtracted from the results for the analyses in that given set of samples. For example, if the blank/background sample produces 50 counts, and a given sample being analyzes produces 47 counts, then the net count for that sample is reported as -3 counts. That negative value of -3 counts is used to calculate the concentration of radioactivity for that particular analysis. Such a sample result is technically more valid than reporting a qualitative value such as "<LLD" (Lower limit of Detection) or "NDA" (No Detectable Activity)".

As an example of how to interpret data presented in the results tables, refer to the first entry on the table for air particulate filters (page 41). Gross beta (GR-B) analyses were performed on 569 routine samples. None of the samples exceeded ten times the average concentration at the control location. The lower limit of detection (LLD) required by the ODCM is 0.01 pCi/m^3.

For samples collected from the ten indicator stations, 516 out of 516 samples indicated detectable gross beta activity at the three-sigma (standard deviation) level. The mean concentration of gross beta activity in these 516 indicator station samples was 0.015 ± 0.0039 (1.5E-2 ± 3.9E-3) pCi/m^3. Individual values ranged from 0.0056 to 0.027 (5.6E-3 – 2.7E-2) pCi/m^3

The monitoring station which yielded the highest mean concentration was the control location ER (East Rocky Hill Road), which yielded a mean concentration of 0.016 ± 0.004 pCi/m^3, based on 52 detectable indications out of 52 samples observations. Individual values ranged from 0.0071 to 0.025 pCi/m^3.

At the control location, 52 out of 52 samples yielded detectable gross beta activity, for an average concentration of 0.048 ± 0.0037 pCi/m^3. Individual samples at the East Weymouth control location ranged from 0.0076 to 0.023 pCi/m^3.

Analyses for cesium-137 (Cs-137) were performed 44 times (quarterly composites for 11 stations * 4 quarters). No samples exceeded ten times the mean control station concentration. The required LLD value Cs-137 in the PNPS ODCM is 0.06 pCi/m^3.

At the indicator stations, all 40 of the Cs-137 measurements were below the detection level. The same was true for the four measurements made on samples collected from the control location.

Analyses for Beryllium-7 (Be-7) are used to indicate representative sampling for air samplers in environmental applications.

2.4 Ambient Radiation Measurements

The primary technique for measuring ambient radiation exposure in the vicinity of Pilgrim Station involves posting environmental thermoluminescent dosimeters (TLDs) at given monitoring locations and retrieving the TLDs after a specified time period. The TLDs are then taken to a laboratory and processed to determine the total amount of radiation exposure received over the period. Although TLDs can be used to monitor radiation exposure for short time periods, environmental TLDs are typically posted for periods of one to three months. Such TLD monitoring yields average exposure rate measurements over a relatively long time period. The PNPS environmental TLD monitoring program is based on a quarterly (three month) posting period, and a total of 113 locations are monitored using this technique. In addition, 27 of the 113 TLDs are located onsite, within the PNPS protected/restricted area, where the general public does not have access.

Out of the 452 TLDs (113 locations * 4 quarters) posted during 2019, 452 were retrieved and processed. The results for environmental TLDs located offsite, beyond the PNPS protected/restricted area fence, are presented in Table 2.4-1. Results from onsite TLDs posted within the restricted area are presented in Table 2.4-2. In addition to TLD results for individual locations, results from offsite TLDs were grouped according to geographic zone to determine average exposure rates as a function of distance. These results are summarized in Table 2.4-3. All of the listed exposure values represent continuous occupancy (2190 hr/qtr or 8760 hr/yr).

Annual exposure rates measured at locations beyond the PNPS protected area boundary ranged from 39 to 122 mR/yr. The average exposure rate at control locations greater than 15 km from Pilgrim Station (i.e., Zone 4) was 60.0 ± 8.4 mR/yr. When the 3-sigma confidence interval is calculated based on these control measurements, 99% of all measurements of background ambient exposure would be expected to be between 35 and 85 mR/yr. The results for all TLDs within 15 km (excluding those Zone 1 TLDs posted within the site boundary) ranged from 39 to 89 mR/yr, which compares favorably with the preoperational results of 37 - 190 mR/yr.

Inspection of onsite TLD results listed in Table 2.4-2 indicates that all of those TLDs located within the PNPS protected/restricted area yield exposure measurements higher than the average natural background. Such results are expected due to the close proximity of these locations to radiation sources onsite. The radionuclide nitrogen-16 (N-16) contained in steam flowing through the turbine accounts for most of the exposure onsite during operation. Although this radioactivity is contained within the turbine and is not released to the atmosphere, the "sky shine" which occurs from the turbine increases the ambient radiation levels in areas near the turbine building.

A small number of offsite TLD locations in close proximity to the protected/restricted area indicated ambient radiation exposure above expected background levels. All of these locations are on Pilgrim Station controlled property, and experience exposure increases due to turbine sky shine and proximity to the onsite fuel storage pad (e.g., locations OA, TC, PB, and P01) and/or transit and storage of radwaste onsite (e.g., locations BLE and BLW). Due to heightened security measures following September 11 2001, members for the general public do not have access to such locations within the owner-controlled area.

It should be noted that several of the TLDs used to calculate the Zone 1 averages presented in Table 2.4-3 are located on Pilgrim Station property. If the Zone 1 value is corrected for the near-site TLDs (those less than 0.6 km from the Reactor Building), the Zone 1 mean falls from a value of 68.7 ± 17.9 mR/yr to 61.8 ± 9.8 mR/yr. Additionally, exposure rates measured at areas beyond the site's control did not indicate any increase in ambient exposure from Pilgrim Station operation. For example, the annual exposure rate calculated from the TLD adjacent to the nearest offsite residence 0.80 kilometers (0.5 miles) southeast of the PNPS Reactor Building was 59.5 ± 3.8 mR/yr, which compares quite well with the average control location exposure of 60.0 ± 8.4 mR/yr.

In conclusion, measurements of ambient radiation exposure around Pilgrim Station do not indicate any significant increase in exposure levels. Although some increases in ambient radiation exposure level were apparent on site property very close to Pilgrim Station, there were no measurable increases at areas beyond the site's control.

2.5 Air Particulate Filter Radioactivity Analyses

Airborne particulate radioactivity is sampled by drawing a stream of air through a glass fiber filter that has a very high efficiency for collecting airborne particulates. These samplers are operated continuously, and the resulting filters are collected weekly for analysis. Weekly filter samples are analyzed for gross beta radioactivity, and the filters are then composited on a quarterly basis for each location for gamma spectroscopy analysis. PNPS uses this technique to monitor 10 locations in the Plymouth area, along with the control location in East Weymouth.

Out of 572 filters (11 locations * 52 weeks), 568 samples were collected and analyzed during 2019. There were a few instances where power was lost or pumps failed during the course of the sampling period at some of the air sampling stations, resulting in lower than normal sample volumes. There were 4 occasions where the loss of power was sufficiently long that the minimum sample volumes needed to achieve required detection limits were not met. Although these filters were analyzed, the LLDs were not met and these analyses were not included with the other results. All of these discrepancies are noted in Appendix D.

The results of the analyses performed on these 568 filter samples are summarized in Table 2.5-1. Trend plots for the gross beta radioactivity levels at the near station, property line, and offsite airborne monitoring locations are shown in Figures 2.5-1, 2.5-2 and 2.5-3, respectively. Gross beta radioactivity was detected in 568 of the filter samples collected, including 52 of the 52 control location samples. This gross beta activity arises from naturally-occurring radionuclides such as radon decay daughter products. Naturally-occurring beryllium-7 was detected in 44 out of 44 of the quarterly composites analyzed with gamma spectroscopy. No airborne radioactivity attributable to Pilgrim Station was detected in any of the samples collected during 2019, and results of any detectable naturally-occurring radioactivity were similar to those observed in the preoperational monitoring program.

2.6 Charcoal Cartridge Radioactivity Analyses

Airborne radioactive iodine is sampled by drawing a stream of air through a charcoal cartridge after it has passed through the high efficiency glass fiber filter. As is the case with the air particulate filters, these samplers are operated continuously, and the resulting cartridges are collected weekly for analysis. Weekly cartridge samples are analyzed for radioactive iodine. The same eleven locations monitored for airborne particulate radioactivity are also sampled for airborne radioiodine. The sampling of iodine was discontinued at all stations once iodine decayed away following the permeant shutdown of the plant in May 2019.

Out of 528 charcoal cartridges (11 locations * 48 weeks), 525 samples were collected and analyzed during 2019. There were a few instances where power was lost or pumps failed during the course of the sampling period at some of the air sampling stations, resulting in lower than normal sample volumes. There were four occasions where the incident was sufficiently long that the minimum sample volumes needed to achieve required detection limits were not met. Although these cartridges were analyzed when available, the LLDs were not met and these analyses were not included with the other results. All of these discrepancies are noted in Appendix D.

The results of the analyses performed on these charcoal cartridges are summarized in Table 2.6-1. No airborne radioactive iodine attributable to Pilgrim Station was detected in any of the charcoal cartridges collected.

2.7 Milk Radioactivity Analyses

In July 2002, the Plymouth County Farm ceased operation of its dairy facility. This was historically the only dairy facility near Pilgrim Station, and had been sampled continuously since Pilgrim Station began operation in 1972. Although attempts were made to obtain samples from an alternate indicator location within 5 miles as specified in NRC guidance (Reference 14), a suitable substitute location could not be found. Thus, milk collection at an indicator location was discontinued in July 2002, but control samples of milk continued to be collected and analyzed in the event an indicator location could be secured. In conjunction with the standardization of the ODCM during 2003, the decision was made to remove milk sampling from the PNPS Radiological Environmental Monitoring Program since no suitable milk sampling location existed in the vicinity of Pilgrim Station.

The nearest milk animals to Pilgrim Station are located at the Plimoth Plantation, approximately 2.5 miles west of PNPS, in a relatively upwind direction. Due to the limited number of milk animals available, this location is not able to provide the necessary volume of 4 gallons of milk every two weeks to facilitate the milk sampling program and meet the required detection sensitivities. Although milk sampling is not performed at Plimoth Plantation, effluent dose calculations are performed for this location assuming the presence of a milk ingestion pathway, as part of the annual Effluent and Waste Disposal Report (Reference 17).

As included in a provision in standard ODCM guidance in NUREG-1302 (Reference 13), sampling and analysis of vegetation from the offsite locations calculated to have the highest D/Q deposition factor can be performed in lieu of milk sampling. Such vegetation sampling has been routinely performed at Pilgrim Station as part of the radiological environmental monitoring program, and the results of this sampling are presented in Section 2.9.

2.8 Forage Radioactivity Analyses

Samples of animal forage (hay) had been collected in the past from the Plymouth County Farm, and from control locations in Bridgewater. However, due to the absence of any grazing animals within a five-mile radius of Pilgrim Station that are used for generation of food products (milk or meat), no samples of forage were collected during 2019. A number of wild vegetation samples were collected within a five mile radius of Pilgrim Station as part of the vegetable/vegetation sampling effort, and the results of this sampling would provide an indication of any radioactivity potentially entering the forage-milk or forage-meat pathways. Results of the vegetable/vegetation sampling effort are discussed in the following section.

2.9 Vegetable/Vegetation Radioactivity Analyses

Samples of vegetables and naturally-growing vegetation have historically been collected from the Plymouth County Farm and from the control locations in Bridgewater and Sandwich. Results of the land-use census are discussed in Appendix C. In addition to these garden samples, naturally-growing vegetation is collected from locations yielding the highest D/Q deposition factors. All of the various samples of vegetables/vegetation are collected annually and analyzed by gamma spectroscopy.

Sixteen samples of vegetables/vegetation were collected and analyzed as required during 2019. Results of the gamma analyses of these samples are summarized in Table 2.9-1. Naturally-occurring beryllium-7 and potassium-40 were identified in several of the samples collected. Cesium-137 was detected in two of the samples of vegetation collected as had been the case in prior years. Such Cs-137 is the result weapons-testing fallout (75 to 145 pCi/kg as projected from the pre-operational sampling program). It should be noted that natural vegetation samples collected in the 1990s often showed detectable Cs-137 from nuclear weapons tests up into the range of 300 to 400 pCi/kg, whereas soil samples often indicated concentrations in excess of 2000 pCi/kg. Cs-137 has a 30-year half-life, and measureable concentrations still remain in soil and vegetation as a result of atmospheric nuclear weapons testing performed during the 1950s through 1970s. No radioactivity attributable to Pilgrim Station was detected in any of the vegetable/vegetation samples collected during 2019, and results of any detectable naturally-occurring radioactivity were similar to those observed in the preoperational monitoring program.

2.10 Cranberry Radioactivity Analyses

Samples of cranberries were taken from multiple cranberry bogs in past years. As of 2019 there were no longer any harvested cranberry bogs within 5 miles of the plant. Cranberry sampling has since been removed from the station ODCM. These discrepancies are noted in Appendix D. Prior to ending the cranberry sampling effort, there had been no apparent trends in radioactivity measurements at these locations.

2.11 Soil Radioactivity Analyses

In the past, a survey of radioactivity in soil had been conducted once every three years at the 10 air sampling stations in the Plymouth area and the control location in East Weymouth. However, in conjunction with standardization of the ODCM during 2003, the soil survey effort was abandoned in favor of the extensive TLD monitoring effort at Pilgrim Station. Prior to ending the soil survey effort, there had been no apparent trends in radioactivity measurements at these locations.

2.12 Surface Water Radioactivity Analyses

Samples of surface water are routinely collected from the discharge canal, Bartlett Pond in Manomet and from the control location at Powder Point Bridge in Duxbury. Grab samples are collected weekly from the Bartlett Pond and Powder Point Bridge locations. Samples of surface water are composited every four weeks and analyzed by gamma spectroscopy and low-level iodine analysis. These monthly composites are further composited on a quarterly basis and tritium analysis is performed on these quarterly samples.

A total of 35 samples of surface water were collected and analyzed as required during 2019. Bartlett Pond was removed from the ODCM in the fourth Quarter 2019. Results of the analyses of water samples are summarized in Table 2.12-1. Naturally-occurring potassium-40 was detected in several of the samples, especially those composed primarily of seawater. No radioactivity attributable to Pilgrim Station was detected in any of the surface water samples collected during 2019.

In response to the Nuclear Energy Institute Groundwater Protection Initiative, Pilgrim Station installed a number of groundwater monitoring wells within the protected area in late 2007. Because all of these wells are onsite, they are not included in the offsite radiological monitoring program, and are not presented in this report. Details regarding Pilgrim Station’s groundwater monitoring effort can be found in the Annual Radioactive Effluent Release Report.

2.13 Sediment Radioactivity Analyses

Samples of sediment are routinely collected from the outfall area of the discharge canal and from three other locations in the Plymouth area (Manomet Point, Plymouth Harbor and Plymouth Beach), and from control locations in Duxbury and Marshfield. Samples are collected twice per year and are analyzed by gamma spectroscopy.

Twelve of twelve required samples of sediment were collected during 2019. Gamma analyses were performed on these samples. Results of the gamma analyses of sediment samples are summarized in Table 2.13-1. Naturally-occurring potassium-40 and actinium/thorium-228 were detected in all of the samples. No radioactivity attributable to Pilgrim Station was detected in any of the samples collected during 2019, and results of any detectable naturally-occurring radioactivity were similar to those observed in the preoperational monitoring program.

2.14 Irish Moss Radioactivity Analyses

Samples of Irish moss are collected from the discharge canal outfall and two other locations in the Plymouth area (Manomet Point, Ellisville), and from a control location in Marshfield (Brant Rock). All samples are collected on a semiannual basis, and processed in the laboratory for gamma spectroscopy analysis.

Seven of the eight required samples of Irish moss scheduled for collection during 2019 were obtained and analyzed. Results of the gamma analyses of these samples are summarized in Table 2.14-1. Naturally-occurring potassium-40 was detected in all of the samples, and beryllium-7 was detected in three of the samples. No radioactivity attributable to Pilgrim Station was detected in any of the samples collected during 2019, and results of any detectable naturally-occurring radioactivity were similar to those observed in the preoperational monitoring program. As there is no longer any harvesting of Irish moss within the influence of the station, sampling of Irish Moss was removed from the ODCM at the end of 2019.

2.15 Shellfish Radioactivity Analyses

Samples of blue mussels and soft-shell clams are collected from the discharge canal outfall and one other location in the Plymouth area (Plymouth Harbor), and from control locations in Duxbury and Marshfield. All samples are collected on a semiannual basis, and edible portions processed in the laboratory for gamma spectroscopy analysis.

Eight of the ten required samples of shellfish meat scheduled for collection during 2019 were obtained and analyzed. Results of the gamma analyses of these samples are summarized in Table 2.15-1. Naturally-occurring potassium-40 was detected in eight of the eight the samples. No radioactivity attributable to Pilgrim Station was detected in any of the samples collected during 2019, and results of any detectable naturally-occurring radioactivity were similar to those observed in the preoperational monitoring program.

2.16 Lobster Radioactivity Analyses

Samples of lobsters are routinely collected from the outfall area of the discharge canal and from control locations in Cape Cod Bay and Vineyard Sound. Samples are collected monthly from the discharge canal outfall from June through September and once annually from the control locations. All lobster samples are normally analyzed by gamma spectroscopy.

Five samples of lobsters were collected as required during 2019. Results of the gamma analyses of these samples are summarized in Table 2.16-1. Naturally-occurring potassium-40 was detected in five of the five of the samples. No radioactivity attributable to Pilgrim Station was detected in any of the samples collected during 2019, and results of any detectable naturally-occurring radioactivity were similar to those observed in the preoperational monitoring program.

2.17 Fish Radioactivity Analyses

Samples of fish are routinely collected from the area at the outfall of the discharge canal and from the control locations in Cape Cod Bay and Buzzard's Bay. Fish species are grouped into four major categories according to their biological requirements and mode of life. These major categories and the representative species are as follows:

- Group I – Bottom-Oriented: Winter Flounder, Yellowtail Flounder
- Group II - Near-Bottom Distribution: Tautog, Cunner, Pollock, Atlantic Cod, Hake
- Group III - Anadromous: Alewife, Smelt, Striped Bass
- Group IV - Coastal Migratory: Bluefish, Herring, Menhaden, Mackerel

Group I fishes are sampled on a semiannual basis from the outfall area of the discharge canal, and on an annual basis from a control location. Group II, III, and IV fishes are sampled annually from the discharge canal outfall and control location. All samples of fish are analyzed by gamma spectroscopy.

Seven samples of fish were collected during 2019. The seasonal sample of Group III fish (alewife, smelt, striped bass) from the Discharge Outfall was not available due to inability to collect samples as a result of heavy predation from harbor seals that have taken up residence on the breakwater as well as the redudtion if heat in the dishcharge plume. Many fish species gravitated to the warmer waters. With the shutdown of the station the discharge flow and heat was reduced. These discrepancies are discussed in Appendix D. Results of the gamma analyses of fish samples collected are summarized in Table 2.17-1. The only radionuclide detected in any of the fish samples was naturally-occurring potassium-40. No radioactivity attributable to Pilgrim Station was detected in any of the fish samples collected during 2019, and results of any detectable naturally-occurring radioactivity were similar to those observed in the preoperational monitoring program.

Table 2.2-1

Routine Radiological Environmental Sampling Locations
Pilgrim Nuclear Power Station, Plymouth, MA

Description	Code	Distance	Direction
Air Particulate Filters, Charcoal Cartridges			
Medical Building	WS	0.2 km	SSE
East Rocky Hill Road	ER	0.9 km	SE
West Rocky Hill Road	WR	0.8 km	WNW
Property Line	PL	0.5 km	NNW
Pedestrian Bridge	PB	0.2 km	N
Overlook Area	OA	0.1 km	W
East Breakwater	EB	0.5 km	ESE
Cleft Rock	CR	1.3 km	SSW
Plymouth Center	PC	6.7 km	W
Manomet Substation	MS	3.6 km	SSE
East Weymouth Control	EW	40 km	NW
Vegetation/Vegetables			
Plymouth County Farm	CF	5.6 km	W
Hanson Farm Control	HN	35 km	W

Table 2.2-1 (continued)

Routine Radiological Environmental Sampling Locations
Pilgrim Nuclear Power Station, Plymouth, MA

Description	Code	Distance	Direction
Surface Water			
Discharge Canal	DIS	0.2 km	N
Bartlett Pond	BP	2.7 km	SE
Powder Point Control	PP	13 km	NNW
Sediment			
Discharge Canal Outfall	DIS	0.8 km	NE
Plymouth Harbor	Ply-H	4.1 km	W
Duxbury Bay Control	Dux-Bay	14 km	NNW
Plymouth Beach	PLB	4.0 km	WNW
Manomet Point	MP	3.3 km	ESE
Green Harbor Control	GH	16 km	NNW
Irish Moss			
Discharge Canal Outfall	DIS	0.7 km	NNE
Manomet Point	MP	4.0 km	ESE
Ellisville	EL	12 km	SSE
Brant Rock Control	BR	18 km	NNW
Shellfish			
Discharge Canal Outfall	DIS	0.7 km	NNE
Plymouth Harbor	Ply-H	4.1 km	W
Duxbury Bay Control	Dux-Bay	13 km	NNW
Manomet Point	MP	4.0 km	ESE
Green Harbor Control	GH	16 km	NNW
Lobster			
Discharge Canal Outfall	DIS	0.5 km	N
Plymouth Harbor	Ply-H	6.4 km	WNW
Duxbury Bay Control	Dux-Bay	11 km	NNW
Fishes			
Discharge Canal Outfall	DIS	0.5 km	N
Vineyard Sound Control	MV	64 km	SSW
Buzzard's Bay Control	BB	40 km	SSW
Cape Cod Bay Control	CC-Bay	24 km	ESE

Table 2.4-1

Offsite Environmental TLD Results

TLD Station	TLD Location*	Quarterly Exposure - mR/quarter (Value ± Std.Dev.)				2019 Annual** Exposure mR/year
ID Description	Distance/Direction	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	
Zone 1 TLDs: 0-3 km	0-3 km	17.4 ± 6.1	17.9 ± 4.3	17.5 ± 3.4	15.9 ± 3.4	68.7 ± 17.9
BLW BOAT LAUNCH WEST	0.11 km E	32.3 ± 1.5	32.2 ± 1.0	27.0 ± 1.2	30.8 ± 1.1	122.3 ± 10.1
OA OVERLOOK AREA	0.15 km W	46.8 ± 2.3	34.7 ± 1.8	21.9 ± 1.0	18.7 ± 0.9	122.0 ± 51.5
TC HEALTH CLUB	0.15 km WSW	21.5 ± 0.8	18.0 ± 0.6	16.2 ± 1.1	13.8 ± 0.7	69.4 ± 13.1
BLE BOAT LAUNCH EAST	0.16 km ESE	27.2 ± 1.1	27.0 ± 1.1	22.8 ± 1.2	25.0 ± 1.0	102.0 ± 8.5
PB PEDESTRIAN BRIDGE	0.21 km N	26.7 ± 1.3	26.9 ± 1.1	25.6 ± 1.1	24.0 ± 0.9	103.2 ± 5.7
ISF-3 ISFSI-3	0.21 km W	28.0 ± 1.2	23.9 ± 0.7	18.4 ± 1.0	17.0 ± 0.6	87.3 ± 20.3
P01 SHOREFRONT SECURITY	0.22 km NNW	17.9 ± 0.8	16.8 ± 0.6	15.6 ± 0.8	14.6 ± 0.7	65.0 ± 5.9
WS MEDICAL BUILDING	0.23 km SSE	20.4 ± 1.1	18.1 ± 0.8	16.6 ± 1.0	15.8 ± 0.6	70.9 ± 8.2
ISF-2 ISFSI-2	0.28 km W	21.0 ± 1.0	18.9 ± 0.8	15.2 ± 1.0	14.0 ± 0.8	69.1 ± 13.1
CT PARKING LOT	0.31 km SE	19.0 ± 0.7	19.0 ± 0.7	18.5 ± 1.0	18.1 ± 1.2	74.6 ± 2.6
ISF-1 ISFSI-1	0.35 km SW	18.0 ± 0.7	17.8 ± 0.6	17.1 ± 1.0	18.1 ± 0.9	70.9 ± 2.4
PA SHOREFRONT PARKING	0.35 km NNW	17.6 ± 0.8	18.2 ± 0.6	18.5 ± 0.9	16.3 ± 0.7	70.5 ± 4.2
A STATION A	0.37 km WSW	14.7 ± 0.7	15.3 ± 0.6	15.6 ± 0.8	13.5 ± 0.7	59.1 ± 4.0
F STATION F	0.43 km NW	14.4 ± 0.6	15.6 ± 0.7	15.1 ± 1.2	14.7 ± 0.9	59.8 ± 2.8
EB EAST BREAKWATER	0.44 km ESE	17.6 ± 0.9	17.6 ± 0.5	18.6 ± 0.8	16.4 ± 0.6	70.2 ± 3.8
B STATION B	0.44 km S	19.5 ± 0.8	21.3 ± 0.8	21.5 ± 1.1	19.0 ± 0.8	81.4 ± 5.4
PMT PNPS MET TOWER	0.44 km WNW	16.9 ± 0.9	17.8 ± 0.6	17.9 ± 1.0	16.2 ± 0.8	68.8 ± 3.7
H STATION H	0.47 km SW	15.7 ± 1.0	17.5 ± 0.8	17.3 ± 0.9	15.7 ± 1.0	66.2 ± 4.3
I STATION I	0.48 km WNW	13.7 ± 0.8	15.4 ± 0.7	15.7 ± 0.8	14.2 ± 0.7	59.0 ± 4.0
L STATION L	0.50 km ESE	16.5 ± 0.8	16.6 ± 0.7	18.0 ± 1.2	16.8 ± 0.7	67.9 ± 3.2
G STATION G	0.53 km W	13.8 ± 0.8	15.1 ± 0.5	14.7 ± 0.7	13.1 ± 0.7	56.7 ± 3.8
D STATION D	0.54 km NNW	16.0 ± 0.8	17.6 ± 0.6	17.9 ± 1.0	16.6 ± 0.7	68.1 ± 3.9
PL PROPERTY LINE	0.54 km NW	15.7 ± 0.9	16.5 ± 0.7	16.3 ± 0.8	14.8 ± 0.6	63.2 ± 3.4
C STATION C	0.57 km ESE	16.3 ± 0.8	16.5 ± 0.8	17.7 ± 1.3	15.3 ± 1.0	65.8 ± 4.4
HB HALL'S BOG	0.63 km SE	16.9 ± 1.1	17.1 ± 0.7	18.7 ± 1.2	15.9 ± 0.9	68.6 ± 5.1
GH GREENWOOD HOUSE	0.65 km ESE	15.6 ± 0.7	16.1 ± 0.7	17.6 ± 1.0	15.9 ± 1.1	65.2 ± 4.0
WR W ROCKY HILL ROAD	0.83 km WNW	19.1 ± 1.0	20.3 ± 0.9	30.4 ± 1.6	19.2 ± 0.9	89.0 ± 21.9
ER E ROCKY HILL ROAD	0.89 km SE	14.5 ± 0.7	15.1 ± 0.6	16.0 ± 0.7	13.9 ± 0.9	59.5 ± 3.8
MT MICROWAVE TOWER	1.03 km SSW	15.7 ± 0.7	16.4 ± 0.7	18.2 ± 1.4	15.4 ± 0.7	65.7 ± 5.2
CR CLEFT ROCK	1.27 km SSW	16.5 ± 0.9	16.5 ± 0.7	17.4 ± 1.1	16.6 ± 0.7	67.1 ± 2.5
BD BAYSHORE/GATE RD	1.34 km WNW	15.8 ± 0.7	17.5 ± 1.0	17.8 ± 0.8	15.8 ± 0.7	66.9 ± 4.5
MR MANOMET ROAD	1.38 km S	15.3 ± 0.6	17.2 ± 0.7	17.4 ± 1.1	16.5 ± 0.7	66.4 ± 4.2
DR DIRT ROAD	1.48 km SW	12.7 ± 0.6	15.0 ± 0.9	14.6 ± 0.8	12.7 ± 0.7	54.9 ± 5.1
EM EMERSON ROAD	1.53 km SSE	15.4 ± 0.9	16.8 ± 1.0	16.3 ± 1.2	15.1 ± 0.6	63.6 ± 3.7
EP EMERSON/PRISCILLA	1.55 km SE	14.7 ± 1.0	15.7 ± 0.5	15.1 ± 0.9	14.3 ± 0.7	59.7 ± 2.9
AR EDISON ACCESS ROAD	1.59 km SSE	13.1 ± 0.7	14.5 ± 1.0	14.7 ± 0.8	12.6 ± 0.8	54.9 ± 4.6
BS BAYSHORE	1.76 km W	16.4 ± 0.7	18.3 ± 0.6	18.5 ± 1.2	16.6 ± 0.8	69.8 ± 4.7
E STATION E	1.86 km S	13.6 ± 0.8	15.9 ± 1.1	16.0 ± 0.8	14.4 ± 0.8	59.8 ± 5.1
JG JOHN GAULEY	1.99 km W	15.6 ± 0.7	16.8 ± 0.6	17.0 ± 0.9	15.3 ± 1.1	64.7 ± 3.8
J STATION J	2.04 km SSE	13.6 ± 0.8	15.1 ± 0.7	16.0 ± 1.1	13.4 ± 0.8	58.2 ± 5.3
WH WHITEHORSE ROAD	2.09 km SSE	14.5 ± 0.6	15.1 ± 0.5	15.5 ± 0.8	14.7 ± 0.7	59.8 ± 2.3
RC PLYMOUTH YMCA	2.09 km WSW	12.5 ± 0.7	15.6 ± 1.0	15.6 ± 1.0	13.5 ± 0.6	57.1 ± 6.4
K STATION K	2.17 km S	12.9 ± 0.7	14.1 ± 0.7	14.1 ± 0.9	12.3 ± 0.7	53.4 ± 4.0
TT TAYLOR/THOMAS	2.26 km SE	14.3 ± 0.8	16.3 ± 0.7	16.4 ± 0.9	15.5 ± 0.6	62.4 ± 4.1
YV YANKEE VILLAGE	2.28 km WSW	14.3 ± 0.6	16.6 ± 0.7	17.3 ± 0.8	14.5 ± 0.8	62.7 ± 6.2
GN GOODWIN PROPERTY	2.38 km SW	10.7 ± 0.5	12.2 ± 0.5	12.5 ± 0.9	10.6 ± 0.7	46.1 ± 4.3
RW RIGHT OF WAY	2.83 km S	11.6 ± 0.5	12.8 ± 0.5	12.7 ± 0.9	11.1 ± 0.6	48.2 ± 3.6
TP TAYLOR/PEARL	2.98 km SE	14.0 ± 0.7	15.7 ± 0.7	15.3 ± 0.8	14.3 ± 0.7	59.2 ± 3.5

* Distance and direction are measured from centerline of Reactor Building to the monitoring location.
** Annual value is based on arithmetic mean of the observed quarterly values multiplied by four quarters/year.

Table 2.4-1 (continued)

Offsite Environmental TLD Results

TLD Station	TLD Location*	Quarterly Exposure - mR/quarter (Value ± Std.Dev.)				2019 Annual** Exposure mR/year
ID Description	Distance/Direction	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	
Zone 2 TLDs: 3-8 km	3-8 km	13.9 ± 1.9	14.5 ± 2.0	15.1 ± 2.2	13.7 ± 1.9	57.3 ± 8.3
VR VALLEY ROAD	3.26 km SSW	12.9 ± 1.1	11.9 ± 0.6	15.9 ± 0.8	12.2 ± 0.6	53.0 ± 7.6
ME MANOMET ELEM	3.29 km SE	15.4 ± 0.6	16.3 ± 0.6	17.0 ± 0.8	16.1 ± 0.8	64.8 ± 2.9
WC WARREN/CLIFFORD	3.31 km W	12.9 ± 0.6	14.9 ± 0.9	15.7 ± 0.8	12.8 ± 0.6	56.4 ± 5.9
BB RT.3A/BARTLETT RD	3.33 km SSE	13.7 ± 0.6	15.7 ± 0.6	16.4 ± 0.9	13.9 ± 0.7	59.7 ± 5.6
MP MANOMET POINT	3.57 km SE	13.5 ± 0.9	14.2 ± 0.8	13.9 ± 0.9	13.0 ± 0.6	54.7 ± 2.6
MS MANOMET SUBSTATION	3.60 km SSE	16.6 ± 0.9	17.0 ± 0.6	18.0 ± 0.9	16.1 ± 0.7	67.7 ± 3.6
BW BEACHWOOD ROAD	3.93 km SE	15.3 ± 0.9	15.0 ± 0.6	16.2 ± 1.0	14.1 ± 0.5	60.6 ± 3.7
PT PINES ESTATE	4.44 km SSW	12.8 ± 0.7	13.7 ± 0.7	13.7 ± 0.9	12.5 ± 0.5	52.7 ± 2.9
EA EARL ROAD	4.60 km SSE	12.8 ± 0.8	15.0 ± 0.8	15.0 ± 0.8	13.5 ± 0.9	56.3 ± 4.7
SP S PLYMOUTH SUBST	4.62 km W	14.9 ± 0.9	16.1 ± 0.6	16.3 ± 1.0	15.2 ± 0.8	62.5 ± 3.3
RP ROUTE 3 OVERPASS	4.81 km SW	15.1 ± 0.9	15.8 ± 0.6	16.2 ± 1.0	14.6 ± 0.7	61.8 ± 3.3
RM RUSSELL MILLS RD	4.85 km WSW	13.6 ± 0.6	14.3 ± 0.6	14.7 ± 0.7	13.2 ± 0.6	55.7 ± 3.0
HD HILLDALE ROAD	5.18 km W	14.5 ± 0.9	16.0 ± 0.5	17.6 ± 1.1	14.4 ± 0.7	62.5 ± 6.2
MB MANOMET BEACH	5.43 km SSE	15.6 ± 0.9	14.8 ± 0.7	15.6 ± 0.9	15.1 ± 0.9	61.1 ± 2.3
BR BEAVERDAM ROAD	5.52 km S	14.3 ± 0.7	15.1 ± 0.6	14.9 ± 0.8	13.9 ± 0.8	58.2 ± 2.6
PC PLYMOUTH CENTER	6.69 km W	9.5 ± 0.6	10.3 ± 0.6	9.6 ± 0.5	10.0 ± 0.6	39.3 ± 1.9
LD LONG POND/DREW RD	6.97 km WSW	11.1 ± 0.6	12.0 ± 0.5	12.2 ± 0.8	10.9 ± 0.5	46.1 ± 2.8
HR HYANNIS ROAD	7.33 km SSE	13.8 ± 0.8	13.4 ± 0.6	14.0 ± 0.8	13.5 ± 0.7	54.7 ± 1.9
SN SAQUISH NECK	7.58 km NNW	11.7 ± 0.6	10.7 ± 0.5	11.2 ± 0.8	11.4 ± 0.6	44.9 ± 2.1
MH MEMORIAL HALL	7.58 km WNW	18.4 ± 0.8	18.5 ± 0.8	19.0 ± 1.2	18.2 ± 0.8	74.1 ± 2.3
CP COLLEGE POND	7.59 km SW	13.7 ± 0.6	13.8 ± 0.7	14.5 ± 0.8	13.8 ± 0.7	55.8 ± 2.1
Zone 3 TLDs: 8-15 km	8-15 km	14.2 ± 1.3	13.9 ± 1.5	14.2 ± 1.5	13.4 ± 1.1	55.8 ± 5.3
DW DEEP WATER POND	8.59 km W	15.5 ± 0.7	16.3 ± 0.7	16.3 ± 1.0	15.0 ± 0.7	63.1 ± 3.0
LP LONG POND ROAD	8.88 km SSW	13.2 ± 0.6	12.6 ± 0.8	13.0 ± 0.9	12.6 ± 0.6	51.4 ± 1.8
NP NORTH PLYMOUTH	9.38 km WNW	16.1 ± 0.7	16.6 ± 0.6	16.9 ± 0.9	15.2 ± 0.8	64.8 ± 3.4
SS STANDISH SHORES	10.39 km NW	13.5 ± 0.6	14.1 ± 0.7	14.4 ± 0.9	13.0 ± 0.6	55.0 ± 2.9
EL ELLISVILLE ROAD	11.52 km SSE	14.9 ± 0.8	14.5 ± 0.5	14.9 ± 0.8	14.4 ± 0.8	58.6 ± 1.8
UC UP COLLEGE POND RD	11.78 km SW	13.2 ± 0.7	12.6 ± 0.6	12.7 ± 0.6	12.6 ± 0.7	51.0 ± 1.8
SH SACRED HEART	12.92 km W	13.4 ± 0.7	13.5 ± 0.5	14.3 ± 0.8	13.1 ± 0.7	54.4 ± 2.5
KC KING CAESAR ROAD	13.11 km NNW	15.6 ± 1.0	13.5 ± 0.5	13.6 ± 1.1	12.8 ± 0.5	55.5 ± 5.2
BE BOURNE ROAD	13.37 km S	12.5 ± 0.8	12.1 ± 0.7	12.8 ± 1.0	12.0 ± 0.5	49.5 ± 2.1
SA SHERMAN AIRPORT	13.43 km WSW	13.9 ± 0.7	13.6 ± 0.6	13.5 ± 0.9	13.7 ± 0.6	54.7 ± 1.6
Zone 4 TLDs: >15 km	>15 km	14.6 ± 2.1	15.1 ± 2.0	15.3 ± 2.2	14.9 ± 2.6	60.0 ± 8.4
CS CEDARVILLE SUBST	15.93 km S	14.8 ± 0.7	14.6 ± 0.7	15.2 ± 0.9	14.3 ± 0.7	58.9 ± 2.1
KS KINGSTON SUBST	16.15 km WNW	14.8 ± 0.9	15.5 ± 0.7	14.9 ± 1.0	14.8 ± 0.6	60.0 ± 2.0
LR LANDING ROAD	16.46 km NNW	13.2 ± 0.7	13.7 ± 0.8	14.2 ± 1.0	13.0 ± 0.7	54.1 ± 2.7
CW CHURCH/WEST	16.56 km NW	11.2 ± 0.6	12.0 ± 0.8	12.0 ± 1.0	11.2 ± 0.6	46.5 ± 2.4
MM MAIN/MEADOW	17.02 km WSW	14.4 ± 0.7	14.8 ± 0.7	14.8 ± 1.2	14.9 ± 0.7	58.8 ± 1.9
DMF DIV MARINE FISH	20.97 km SSE	17.7 ± 0.9	18.0 ± 0.8	18.1 ± 1.2	18.5 ± 0.9	72.5 ± 2.3
EW E WEYMOUTH SUBST	39.69 km NW	16.2 ± 0.9	17.0 ± 0.7	17.9 ± 1.1	17.8 ± 0.8	68.9 ± 3.5

* Distance and direction are measured from centerline of Reactor Building to the monitoring location.
** Annual value is based on arithmetic mean of the observed quarterly values multiplied by four quarters/year.

Table 2.4-2

Onsite Environmental TLD Results

TLD Station	TLD Location*	Quarterly Exposure - mR/quarter (Value ± Std.Dev.)				2019 Annual** Exposure mR/year
ID Description	Distance/Direction	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	
Onsite TLDs						
P21 O&M/RXB. BREEZEWAY	50 m SE	25.5 ± 1.2	32.4 ± 1.8	30.2 ± 1.4	35.1 ± 1.5	123.2 ± 16.4
P24 EXEC.BUILDING	57 m W	45.0 ± 2.0	34.8 ± 1.7	24.7 ± 1.6	26.0 ± 1.2	130.4 ± 37.7
P04 FENCE-R SCREENHOUSE	66 m N	44.0 ± 1.6	38.9 ± 1.3	36.4 ± 1.6	45.5 ± 2.6	164.8 ± 17.4
P20 O&M - 2ND W WALL	67 m SE	29.2 ± 1.6	24.2 ± 0.9	15.6 ± 1.2	18.2 ± 0.9	87.2 ± 24.7
P25 EXEC.BUILDING LAWN	76 m WNW	47.3 ± 3.2	38.1 ± 2.4	26.3 ± 1.6	26.3 ± 1.0	138.0 ± 41.0
P05 FENCE-WATER TANK	81 m NNE	22.0 ± 1.1	22.7 ± 0.8	18.9 ± 0.9	21.4 ± 1.1	84.9 ± 6.9
P06 FENCE-OIL STORAGE	85 m NE	28.7 ± 1.2	28.3 ± 0.9	24.2 ± 1.1	27.0 ± 1.4	108.2 ± 8.4
P19 O&M - 2ND SW CORNER	86 m S	21.1 ± 1.0	18.3 ± 0.8	13.4 ± 0.7	15.6 ± 0.8	68.4 ± 13.4
P18 O&M - 1ST SW CORNER	90 m S	27.2 ± 1.1	24.0 ± 1.6	15.9 ± 1.2	18.4 ± 0.9	85.5 ± 20.8
P08 COMPRESSED GAS STOR	92 m E	32.2 ± 1.3	30.7 ± 1.2	22.8 ± 1.2	26.3 ± 1.2	111.9 ± 17.3
P03 FENCE-L SCREENHOUSE	100 m NW	35.6 ± 1.8	29.5 ± 1.2	21.6 ± 1.0	23.1 ± 1.5	109.8 ± 25.9
P17 FENCE-EXEC.BUILDING	107 m W	195.2 ± 9.2	199.7 ± 6.5	177.1 ± 7.8	137.8 ± 5.5	709.8 ± 113.6
P07 FENCE-INTAKE BAY	121 m ENE	27.3 ± 1.0	24.7 ± 1.2	26.1 ± 1.3	25.6 ± 1.7	103.8 ± 5.2
P23 O&M - 2ND S WALL	121 m SSE	30.4 ± 1.8	21.5 ± 1.1	M ± M	16.9 ± 1.0	91.7 ± 27.7
P26 FENCE-WAREHOUSE	134 m ESE	28.7 ± 1.1	26.9 ± 1.1	21.0 ± 1.5	24.5 ± 0.9	101.1 ± 13.6
P02 FENCE-SHOREFRONT	135 m NW	27.7 ± 1.3	25.4 ± 1.6	19.3 ± 0.9	20.9 ± 1.3	93.3 ± 15.8
P09 FENCE-W BOAT RAMP	136 m E	27.0 ± 1.5	25.9 ± 1.0	20.8 ± 1.3	23.4 ± 0.9	97.0 ± 11.3
P22 O&M - 2ND N WALL	137 m SE	20.0 ± 1.1	19.9 ± 0.6	17.0 ± 1.0	19.2 ± 0.8	76.1 ± 5.8
P16 FENCE-W SWITCHYARD	172 m SW	77.7 ± 3.2	49.0 ± 1.7	18.6 ± 0.8	20.2 ± 1.1	165.5 ± 111.9
P11 FENCE-TCF GATE	183 m ESE	32.7 ± 1.4	32.2 ± 1.2	25.4 ± 1.4	27.1 ± 1.0	117.4 ± 14.7
P27 FENCE-TCF/BOAT RAMP	185 m ESE	24.4 ± 1.4	23.9 ± 0.9	21.6 ± 1.2	24.6 ± 1.4	94.5 ± 6.0
P12 FENCE-ACCESS GATE	202 m SE	22.7 ± 1.2	20.8 ± 0.7	16.2 ± 0.9	19.1 ± 1.0	78.8 ± 11.2
P15 FENCE-E SWITCHYARD	220 m S	21.6 ± 1.0	20.4 ± 0.8	15.4 ± 0.7	17.5 ± 0.8	74.8 ± 11.5
P10 FENCE-TCF/INTAKE BAY	223 m E	26.1 ± 1.7	25.8 ± 1.0	23.7 ± 1.3	26.9 ± 1.6	102.5 ± 6.2
P13 FENCE-MEDICAL BLDG.	224 m SSE	23.2 ± 1.0	22.1 ± 0.8	17.7 ± 0.9	19.8 ± 1.0	82.7 ± 10.0
P14 FENCE-BUTLER BLDG	228 m S	17.3 ± 1.2	17.6 ± 0.6	14.2 ± 0.8	15.5 ± 0.8	64.6 ± 6.7
P28 FENCE-TCF/PRKNG LOT	259 m ESE	40.2 ± 1.5	36.3 ± 1.5	34.1 ± 2.0	34.1 ± 1.8	144.7 ± 11.9

* Distance and direction are measured from centerline of Reactor Building to the monitoring location.
** Annual value is based on arithmetic mean of the observed quarterly values multiplied by four quarters/year.

Table 2.4-3

Average TLD Exposures By Distance Zone During 2019

Exposure Period	Average Exposure ± Standard Deviation: mR/period			
	Zone 1* 0-3 km	Zone 2 3-8 km	Zone 3 8-15 km	Zone 4 >15 km
Jan-Mar	17.4 ± 6.1	13.9 ± 1.9	14.2 ± 1.3	14.6 ± 2.1
Apr-Jun	17.9 ± 4.3	14.5 ± 2.0	13.9 ± 1.5	15.1 ± 2.0
Jul-Sep	17.5 ± 3.4	15.1 ± 2.2	14.2 ± 1.5	15.3 ± 2.2
Oct-Dec	15.9 ± 3.4	13.7 ± 1.9	13.4 ± 1.1	14.9 ± 2.6
Jan-Dec	68.7 ± 17.9	57.3 ± 8.3	55.8 ± 5.3	60.0 ± 8.4

* Zone 1 extends from the PNPS restricted/protected area boundary outward to 3 kilometers (2 miles), and includes several TLDs located within the site boundary.

** When corrected for TLDs located within the site boundary, the Zone 1 annual average is calculated to be 57.4 ± 7.7 mR/yr.

Table 2.5-1
Air Particulate Filter Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: Air Particulates (AP) UNITS: pCi/cubic meter

Radionuclide	No. Analyses Non-routine*	Required LLD	Indicator Stations Mean ± Std.Dev. Range Fraction>LLD	Station with Highest Mean Station: Mean ± Std.Dev. Range Fraction>LLD	Control Stations Mean ± Std.Dev. Range Fraction>LLD
Gross Beta	569 0	0.01	1.5E-2 ± 3.9E-3 5.6E-3 - 2.7E-2 516 / 516	1.6E-2 ± 4.0E-3 7.1E-3 - 2.5E-2 52 / 52	1.5E-2 ± 3.7E-3 7.6E-3 - 2.3E-2 53 / 53
Be-7	44 0		9.0E-4 ± 1.9E-3 -2.3E-3 - 6.8E-3 40 / 40	1.8E-3 ± 2.2E-3 3.6E-4 - 4.4E-3 4 / 4	1.2E-3 ± 2.9E-3 -7.1E-4 - 5.2E-3 4 / 4
Cs-134	44 0	0.05	8.2E-5 ± 1.1E-3 -4.2E-3 - 2.0E-3 40 / 40	9.5E-4 ± 1.0E-3 6.0E-4 - 1.9E-3 4 / 4	-5.7E-4 ± 8.8E-4 -1.2E-3 - -6.7E-5 4 / 4
Cs-137	44 0	0.06	1.6E-3 ± 2.2E-2 -9.5E-2 - 5.4E-2 40 / 40	1.5E-2 ± 3.1E-2 -3.6E-3 - 5.4E-2 4 / 4	-1.3E-2 ± 3.1E-2 -5.3E-2 - 1.6E-3 4 / 4

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Table 2.6-1
Charcoal Cartridge Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: Charcoal Cartridge (CF) UNITS: pCi/cubic meter

Radionuclide	No. Analyses Non-routine*	Required LLD	Indicator Stations Mean ± Std.Dev. Range Fraction>LLD	Station with Highest Mean Station: Mean ± Std.Dev. Range Fraction>LLD	Control Stations Mean ± Std.Dev. Range Fraction>LLD
I-131	527 0	0.07	8.1E-4 ± 1.0E-2 -3.0E-2 - 3.5E-2 479 / 479	2.0E-3 ± 1.1E-2 -2.0E-2 - 3.5E-2 48 / 48	6.1E-4 ± 9.5E-3 -2.0E-2 - 2.6E-2 48 / 48

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Table 2.7-1
Milk Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

No milk sampling was performed during 2019, as no suitable indicator locations for milk production were available for sampling within 5 miles of Pilgrim Station.

Table 2.8-1
Forage Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

No forage sampling was performed during 2019, as no grazing animals used for food products were available at any indicator locations within 5 miles of Pilgrim Station.

Table 2.9-1
Vegetable/Vegetation Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: Vegetation (TF) UNITS: pCi/kg wet

Radionuclide	No. Analyses Non-routine*	Required LLD	Indicator Stations Mean ± Std.Dev. Range Fraction>LLD	Station with Highest Mean Station: Mean ± Std.Dev. Range Fraction>LLD	Control Stations Mean ± Std.Dev. Range Fraction>LLD
Be-7	11 0		8.7E+2 ± 8.4E+2 -8.3E+1 - 2.2E+3 5 / 11	2.2E+3 ± 2.0E+2 2.2E+3 - 2.2E+3 1 / 1	-4.6E+0 ± 5.4E+1 -6.1E+1 - 4.3E+1 0 / 5
K-40	11 0		3.0E+3 ± 1.0E+3 1.5E+3 - 4.5E+3 11 / 11	4.5E+3 ± 3.1E+2 4.5E+3 - 4.5E+3 1 / 1	3.0E+3 ± 1.2E+3 1.6E+3 - 4.6E+3 5 / 5
I-131	11 0	60	-2.4E+0 ± 1.5E+1 -3.0E+1 - 1.9E+1 0 / 11	1.9E+1 ± 1.2E+1 1.9E+1 - 1.9E+1 0 / 1	3.7E+0 ± 1.8E+1 -1.8E+1 - 2.3E+1 0 / 5
Cs-134	11 0	60	2.6E+0 ± 8.2E+0 -1.6E+1 - 1.1E+1 0 / 11	9.8E+0 ± 1.0E+1 9.8E+0 - 9.8E+0 0 / 1	1.8E+0 ± 8.4E+0 -6.8E+0 - 8.1E+0 0 / 5
Cs-137	11 0	80	2.4E+1 ± 6.5E+1 -1.6E+1 - 2.1E+2 2 / 11	2.1E+2 ± 1.2E+1 2.1E+2 - 2.1E+2 1 / 1	1.8E+0 ± 1.0E+1 -1.1E+1 - 1.4E+1 0 / 5
AcTh-228	11 0		1.1E+2 ± 3.0E+1 1.1E+2 - 1.1E+2 1 / 1	1.1E+2 ± 3.0E+1 1.1E+2 - 1.1E+2 1 / 1	NDA NDA 0 / 0

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Table 2.10-1
Cranberry Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

No cranberry sampling was performed during 2019, as no harvested cranberry bogs were available at any indicator locations within 5 miles of Pilgrim Station.

Table 2.12-1
Surface Water Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: Surface Water (WS) UNITS: pCi/L

Radionuclide	No. Analyses	Required	Indicator Stations	Station with Highest Mean	Control Stations
H-3	12 0	3000	2.9E+1 ± 6.1E+1 -3.0E+1 - 1.5E+2 0 / 8	BarPnd: 1.5E+2 ± 7.6E+1 -3.0E+1 - 1.5E+2 0 / 4	2.3E+1 ± 9.6E+1 -7.5E+1 - 1.4E+2 0 / 4
K-40	23 0		1.7E+2 ± 1.6E+2 -3.5E+1 - 3.7E+2 14 / 23	DIS: 3.1E+2 ± 3.8E+1 2.4E+2 - 3.7E+2 12 / 12	3.0E+2 ± 3.3E+1 2.5E+2 - 3.5E+2 12 / 12
Mn-54	23 0	15	2.6E-1 ± 9.0E-1 -1.5E+0 - 3.2E+0 0 / 23	BarPnd: 4.2E-1 ± 1.1E+0 -7.2E-1 - 3.2E+0 0 / 11	-2.3E-1 ± 7.4E-1 -1.6E+0 - 9.4E-1 0 / 12
Fe-59	23 0	30	1.7E-1 ± 2.0E+0 -4.5E+0 - 3.4E+0 0 / 23	PwdPt: 1.3E+0 ± 1.5E+0 -6.2E-1 - 3.4E+0 0 / 12	1.3E+0 ± 1.5E+0 -6.2E-1 - 3.4E+0 0 / 12
Co-58	23 0	15	-6.1E-2 ± 9.1E-1 -1.3E+0 - 1.5E+0 0 / 23	BarPnd: 3.4E-1 ± 9.2E-1 -1.2E+0 - 1.5E+0 0 / 11	-4.2E-2 ± 8.3E-1 -1.0E+0 - 1.9E+0 0 / 12
Co-60	23 0	15	3.3E-1 ± 8.4E-1 -1.1E+0 - 2.5E+0 1 / 23	BarPnd: 4.5E-1 ± 1.0E+0 -6.2E-1 - 2.5E+0 1 / 11	-1.1E-1 ± 1.3E+0 -2.4E+0 - 3.1E+0 0 / 12
Zn-65	23 0	30	-1.8E+0 ± 2.4E+0 -7.0E+0 - 3.2E+0 0 / 23	DIS:-1.7E+0 ± 2.5E+0 -4.5E+0 - 3.2E+0 0 / 12	-2.5E+0 ± 3.2E+0 -7.3E+0 - 2.6E+0 0 / 12
Zr-95	23 0	30	6.7E-1 ± 8.1E-1 -2.7E-1 - 1.5E+0 0 / 11	BarPnd: 6.7E-1 ± 8.1E-1 -2.7E-1 - 1.5E+0 0 / 11	1.6E-2 ± 1.9E+0 -2.5E+0 - 3.6E+0 0 / 12
Nb-95	23 0	15	5.6E-1 ± 1.6E+0 -3.4E+0 - 3.9E+0 3 / 23	BarPnd: 1.1E+0 ± 1.7E+0 -1.9E+0 - 3.9E+0 3 / 11	7.4E-1 ± 9.9E-1 -1.0E+0 - 2.5E+0 1 / 12
I-131	23 0	15	1.5E+0 ± 3.7E+0 -5.5E+0 - 1.0E+1 2 / 23	DIS:1.7E+0 ± 4.8E+0 -5.5E+0 - 1.0E+1 2 / 12	-3.0E-1 ± 3.5E+0 -6.1E+0 - 6.1E+0 0 / 12
Cs-134	23 0	15	2.3E-1 ± 9.9E-1 -2.4E+0 - 2.0E+0 1 / 23	BarPnd:4.9E-1 ± 9.1E-1 -7.2E-1 - 2.0E+0 1 / 11	3.0E-1 ± 1.3E+0 -1.9E+0 - 3.0E+0 0 / 12
Cs-137	23 0	18	-7.9E-2 ± 1.1E+0 -2.9E+0 - 2.7E+0 0 / 23	BarPnd: 2.8E-1 ± 1.1E+0 -1.4E+0 - 2.7E+0 0 / 11	-1.9E-1 ± 9.3E-1 -2.4E+0 - 9.2E-1 0 / 12
Ba-140	23 0	60	6.9E-1 ± 6.3E+0 -6.6E+0 - 1.5E+1 0 / 23	BarPnd: 1.3E+0 ± 7.0E+0 -6.6E+0 - 1.5E+1 0 / 11	-1.3E+0 ± 8.4E+0 -2.0E+1 - 8.5E+0 0 / 12
La-140	23 0	15	-8.1E-1 ± 2.5E+0 -5.2E+0 - 5.1E+0 0 / 23	BarPnd: 1.7E-2 ± 2.7E+0 -3.4E+0 - 5.1E+0 0 / 11	-4.8E-1 ± 1.2E+0 -1.8E+0 - 1.6E+0 0 / 12

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Table 2.13-1
Sediment Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: Sediment (SE) UNITS: pCi/kg dry

Radionuclide	No. Analyses Non-routine*	Required LLD	Indicator Stations Mean ± Std.Dev. Range Fraction>LLD	Station with Highest Mean Station: Mean ± Std.Dev. Range Fraction>LLD	Control Stations Mean ± Std.Dev. Range Fraction>LLD
K-40	12 0		1.0E+4 ± 2.9E+3 7.1E+3 - 1.6E+4 7 / 7	PlyHrb: 1.6E+4 ± 9.8E+2 1.6E+4 - 1.6E+4 1 / 1	1.2E+4 ± 3.0E+3 9.5E+3 - 1.7E+4 5 / 5
Cs-134	12 0	150	2.7E+1 ± 2.2E+1 7.5E+0 - 6.9E+1 0 / 7	PlyHrb: 6.9E+1 ± 2.5E+1 6.9E+1 - 6.9E+1 0 / 1	9.4E+0 ± 3.8E+1 -1.8E+1 - 6.9E+1 1 / 5
Cs-137	12 0	180	-9.2E+0 ± 2.2E+1 -3.2E+1 - 2.3E+1 0 / 7	DIS: 7.4E+0 ± 2.4E+1 -8.0E+0 - 2.3E+1 0 / 2	-1.8E+0 ± 2.9E+1 -2.4E+1 - 3.9E+1 0 / 5
AcTh-228	12 0		5.3E+2 ± 2.9E+2 3.4E+2 - 7.3E+2 2 / 2	PlyHrb: 7.3E+2 ± 1.4E+2 7.3E+2 - 7.3E+2 1 / 1	4.2E+2 ± 9.3E+1 4.2E+2 - 4.2E+2 1 / 1

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Table 2.14-1
Irish Moss Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: Irish Moss (AL) UNITS: pCi/kg wet

Radionuclide	No. Analyses Non-routine*	Required LLD	Indicator Stations Mean ± Std.Dev. Range Fraction>LLD	Station with Highest Mean Station: Mean ± Std.Dev. Range Fraction>LLD	Control Stations Mean ± Std.Dev. Range Fraction>LLD
Be-7	8 0		3.7E+2 ± 2.1E+2 1.7E+2 - 6.4E+2 3 / 5	DIS: 5.3E+2 ± 1.2E+2 5.3E+2 - 5.3E+2 1 / 1	3.1E+2 ± 2.2E+2 1.5E+2 - 4.6E+2 2 / 2
K-40	8 0		4.6E+3 ± 1.1E+3 2.7E+3 - 5.7E+3 5 / 5	ElsVil: 5.5E+3 ± 3.4E+2 5.3E+3 - 5.7E+3 2 / 2	3.1E+3 ± 2.0E+2 3.0E+3 - 3.2E+3 2 / 2
Mn-54	8 0	130	6.6E+0 ± 1.1E+1 -7.8E+0 - 2.1E+1 0 / 5	ManPt: 1.3E+1 ± 1.2E+1 4.7E+0 - 2.1E+1 0 / 2	-3.0E+0 ± 4.2E+0 -5.4E+0 - -5.0E-1 0 / 2
Fe-59	8 0	260	1.0E+0 ± 2.4E+1 -2.3E+1 - 3.1E+1 0 / 5	DIS: 3.1E+1 ± 1.9E+1 3.1E+1 - 3.1E+1 0 / 1	-1.4E+0 ± 1.0E+1 -7.4E+0 - 4.7E+0 0 / 2
Co-58	8 0	130	-1.4E+0 ± 9.1E+0 -1.3E+1 - 9.9E+0 0 / 5	DIS: 2.9E+0 ± 7.4E+0 2.9E+0 - 2.9E+0 0 / 1	-3.8E+0 ± 6.6E+0 -8.3E+0 - 5.6E-1 0 / 2
Co-60	8 0	130	-2.8E-1 ± 3.7E+0 -3.0E+0 - 2.2E+0 0 / 5	BntRck: 5.1E+0 ± 6.3E+0 1.0E+0 - 9.2E+0 0 / 2	5.1E+0 ± 6.3E+0 1.0E+0 - 9.2E+0 0 / 2
Zn-65	8 0	260	5.9E+0 ± 2.2E+1 -2.3E+1 - 3.0E+1 0 / 5	DIS: 3.0E+1 ± 1.9E+1 3.0E+1 - 3.0E+1 0 / 1	-4.1E+0 ± 2.2E+1 -1.9E+1 - 1.1E+1 0 / 2
Cs-134	8 0	130	6.4E+0 ± 6.8E+0 -3.4E+0 - 1.1E+1 0 / 5	ManPt: 9.7E+0 ± 4.7E+0 8.8E+0 - 1.1E+1 0 / 2	3.2E+0 ± 3.5E+0 1.6E+0 - 4.8E+0 0 / 2
Cs-137	8 0	150	4.0E+0 ± 6.4E+0 -2.9E+0 - 1.1E+1 0 / 5	ElsVl: 4.5E+0 ± 6.1E+0 1.4E+0 - 7.6E+0 0 / 2	4.3E-2 ± 2.9E+0 -1.0E+0 - 1.1E+0 0 / 2

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Table 2.15-1
Shellfish Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: Shellfish (SF) UNITS: pCi/kg wet

Radionuclide	No. Analyses Non-routine*	Required LLD	Indicator Stations Mean ± Std.Dev. Range Fraction>LLD	Station with Highest Mean Station: Mean ± Std.Dev. Range Fraction>LLD	Control Stations Mean ± Std.Dev. Range Fraction>LLD
K-40	8 0		1.5E+3 ± 6.0E+2 9.3E+2 - 2.0E+3 2 / 3	DIS: 1.6E+3 ± 3.5E+2 1.6E+3 - 1.6E+3 1 / 1	1.4E+3 ± 8.6E+2 5.2E+2 - 2.8E+3 4 / 5
Mn-54	8 0	130	1.3E+0 ± 1.3E+1 -4.2E+0 - 1.1E+1 0 / 3	DIS: 1.1E+1 ± 1.8E+1 1.1E+1 - 1.1E+1 0 / 1	-4.1E+0 ± 1.9E+1 -2.7E+1 - 1.5E+1 0 / 5
Fe-59	8 0	260	3.2E+1 ± 2.8E+1 7.9E+0 - 4.5E+1 0 / 3	PlyHbr: 4.4E+1 ± 2.4E+1 4.3E+1 - 4.5E+1 0 / 2	1.9E+1 ± 3.5E+1 -7.9E+0 - 7.2E+1 0 / 5
Co-58	8 0	130	1.6E+1 ± 1.4E+1 4.3E+0 - 2.5E+1 0 / 3	GrnHrb: 3.3E+1 ± 2.0E+1 3.3E+1 - 3.3E+1 0 / 1	1.5E+0 ± 3.2E+1 -3.9E+1 - 3.4E+1 0 / 5
Co-60	8 0	130	6.2E+0 ± 1.1E+1 2.1E+0 - 1.4E+1 0 / 3	GrnHrb: 5.3E+1 ± 2.2E+1 5.3E+1 - 5.3E+1 0 / 1	2.5E+1 ± 3.6E+1 -2.0E+1 - 5.6E+1 0 / 5
Zn-65	8 0	260	-3.7E+1 ± 5.3E+1 -7.9E+1 - 1.4E+1 0 / 3	PlyHrb: -1.7E+1 ± 5.1E+1 -4.7E+1 - 1.4E+1 0 / 2	-4.7E+1 ± 6.9E+1 -1.2E+2 - 4.1E+1 0 / 5
Cs-134	8 0	130	2.0E+1 ± 2.5E+1 -5.7E+0 - 3.6E+1 0 / 3	PlyHrb: 3.3E+1 ± 1.5E+1 2.9E+1 - 3.6E+1 0 / 2	-9.2E-1 ± 2.1E+1 -2.8E+1 - 2.6E+1 0 / 5
Cs-137	8 0	150	-1.2E+1 ± 1.1E+1 -1.7E+1 - -5.7E+0 0 / 3	DuxBay: -4.0E+0 ± 3.3E+1 -3.8E+1 - 3.4E+1 1 / 4	-6.3E+0 ± 2.9E+1 -3.8E+1 - 3.4E+1 1 / 5

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Table 2.16-1
Lobster Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: American Lobster (HA) UNITS: pCi/kg wet

Radionuclide	No. Analyses Non-routine*	Required LLD	Indicator Stations Mean ± Std.Dev. Range Fraction>LLD	Station with Highest Mean Station: Mean ± Std.Dev. Range Fraction>LLD	Control Stations Mean ± Std.Dev. Range Fraction>LLD
K-40	5 0		2.7E+3 ± 5.7E+2 1.9E+3 - 3.2E+3 4 / 4	DIS: 2.7E+3 ± 5.7E+2 1.9E+3 - 3.2E+3 4 / 4	2.5E+3 ± 5.7E+2 2.5E+3 - 2.5E+3 1 / 1
Mn-54	5 0	130	9.7E+0 ± 1.9E+1 -8.6E+0 - 3.2E+1 0 / 4	DIS: 9.7E+0 ± 1.9E+1 -8.6E+0 - 3.2E+1 0 / 4	-1.4E+1 ± 1.8E+1 -1.4E+1 - -1.4E+1 0 / 1
Fe-59	5 0	260	8.9E+0 ± 2.9E+1 -2.3E+1 - 3.5E+1 0 / 4	DIS: 8.9E+0 ± 2.9E+1 -2.3E+1 - 3.5E+1 0 / 4	-4.3E+0 ± 3.5E+1 -4.3E+0 - -4.3E+0 0 / 1
Co-58	5 0	130	-1.9E+0 ± 1.8E+1 -2.4E+1 - 1.6E+1 0 / 4	DIS: -1.9E+0 ± 1.8E+1 -2.4E+1 - 1.6E+1 0 / 4	-5.8E+1 ± 2.3E+1 -5.8E+1 - -5.8E+1 0 / 1
Co-60	5 0	130	2.3E+1 ± 1.2E+1 1.4E+1 - 3.4E+1 0 / 4	CCBay: 2.4E+1 ± 2.4E+1 2.4E+1 - 2.4E+1 0 / 1	2.4E+1 ± 2.4E+1 2.4E+1 - 2.4E+1 0 / 1
Zn-65	5 0	260	-1.7E+1 ± 2.9E+1 -4.9E+1 - 1.2E+1 0 / 4	DIS: -1.7E+1 ± 2.9E+1 -4.9E+1 - 1.2E+1 0 / 4	-6.6E+1 ± 5.7E+1 -6.6E+1 - -6.6E+1 0 / 1
Cs-134	5 0	130	4.6E+0 ± 3.0E+1 -2.8E+1 - 3.1E+1 0 / 4	CCBay: 1.6E+1 ± 2.0E+1 1.6E+1 - 1.6E+1 0 / 1	1.6E+1 ± 2.0E+1 1.6E+1 - 1.6E+1 0 / 1
Cs-137	5 0	150	1.6E+1 ± 1.2E+1 1.3E+0 - 2.6E+1 0 / 4	CCBay: 1.9E+1 ± 2.3E+1 1.9E+1 - 1.9E+1 0 / 1	1.9E+1 ± 2.3E+1 1.9E+1 - 1.9E+1 0 / 1

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Table 2.17-1
Fish Radioactivity Analyses

Radiological Environmental Program Summary
Pilgrim Nuclear Power Station, Plymouth, MA
(January - December 2019)

MEDIUM: Fish (FH) UNITS: pCi/kg wet

Radionuclide	No. Analyses Non-routine*	Required LLD	Indicator Stations Mean ± Std.Dev. Range Fraction>LLD	Station with Highest Mean Station: Mean ± Std.Dev. Range Fraction>LLD	Control Stations Mean ± Std.Dev. Range Fraction>LLD
K-40	7 0		3.2E+3 ± 7.9E+2 2.1E+3 - 4.0E+3 4 / 4	CCBay: 3.5E+3 ± 4.5E+2 3.5E+3 - 3.5E+3 1 / 1	2.9E+3 ± 7.8E+2 2.1E+3 - 3.5E+3 3 / 3
Mn-54	7 0	130	-1.4E+0 ± 1.6E+1 -2.2E+1 - 1.3E+1 0 / 4	BuzBay: 2.6E+1 ± 2.4E+1 1.0E+1 - 4.2E+1 0 / 2	1.3E+1 ± 2.9E+1 -1.3E+1 - 4.2E+1 0 / 3
Fe-59	7 0	260	-1.6E+1 ± 3.1E+1 -3.3E+1 - 2.7E+1 0 / 4	BuzBay: 2.0E+1 ± 3.4E+1 5.9E-1 - 4.0E+1 0 / 2	8.5E+0 ± 3.4E+1 -1.5E+1 - 4.0E+1 0 / 3
Co-58	7 0	130	-4.4E+0 ± 9.7E+0 -1.4E+1 - 4.0E+0 0 / 4	BuzBay: 4.2E+0 ± 1.6E+1 -4.5E+0 - 1.3E+1 0 / 2	-1.9E+0 ± 1.6E+1 -1.4E+1 - 1.3E+1 0 / 3
Co-60	7 0	130	-5.9E+0 ± 3.2E+1 -3.8E+1 - 2.3E+1 0 / 4	CCBay: 4.2E-1 ± 1.9E+1 4.2E-1 - 4.2E-1 0 / 1	-1.6E+0 ± 8.4E+0 -3.1E+0 - 4.2E-1 0 / 3
Zn-65	7 0	260	-3.5E+1 ± 6.5E+1 -1.2E+2 - 2.4E+1 0 / 4	CCBay: 1.0E+1 ± 4.5E+1 1.0E+1 - 1.0E+1 0 / 1	-4.5E+1 ± 8.2E+1 -1.4E+2 - 1.0E+1 0 / 3
Cs-134	7 0	130	-6.4E+0 ± 1.8E+1 -1.9E+1 - 1.9E+1 0 / 4	BuzBay: 8.7E+0 ± 2.5E+1 -7.2E+0 - 2.5E+1 0 / 2	4.6E+0 ± 2.0E+1 -7.2E+0 - 2.5E+1 0 / 3
Cs-137	7 0	150	8.8E+0 ± 1.6E+1 -1.0E+1 - 2.1E+1 0 / 4	DIS: 8.8E+0 ± 1.6E+1 -1.0E+1 - 2.1E+1 0 / 4	-1.7E+1 ± 2.4E+1 -4.3E+1 - -1.3E+0 0 / 3

* Non-Routine refers to those radionuclides that exceeded the Reporting Levels in ODCM Table 3.5-4.

Figure 2.2-1

Environmental TLD Locations Within the PNPS Protected Area

TLD Station		Location*
Description	Code	Distance/Direction
TLDs Within Protected Area		
O&M/RXB. BREEZEWAY	P21	50 m SE
EXEC.BUILDING	P24	57 m W
FENCE-R SCREENHOUSE	P04	66 m N
O&M - 2ND W WALL	P20	67 m SE
EXEC.BUILDING LAWN	P25	76 m WNW
FENCE-WATER TANK	P05	81 m NNE
FENCE-OIL STORAGE	P06	85 m NE
O&M - 2ND SW CORNER	P19	86 m S
O&M - 1ST SW CORNER	P18	90 m S
COMPRESSED GAS STOR	P08	92 m E
FENCE-L SCREENHOUSE	P03	100 m NW
FENCE-EXEC.BUILDING	P17	107 m W
O&M - 2ND S WALL	P23	121 m ENE
FENCE-INTAKE BAY	P07	121 m SSE
FENCE-WAREHOUSE	P26	134 m ESE
FENCE-SHOREFRONT	P02	135 m NW
FENCE-W BOAT RAMP	P09	136 m E
O&M - 2ND N WALL	P22	137 m SE
FENCE-W SWITCHYARD	P16	172 m SW
FENCE-TCF GATE	P11	183 m ESE
FENCE-TCF/BOAT RAMP	P27	185 m ESE
FENCE-ACCESS GATE	P12	202 m SE
FENCE-E SWITCHYARD	P15	220 m S
FENCE-TCF/INTAKE BAY	P10	223 m E
FENCE-MEDICAL BLDG.	P13	224 m SSE
FENCE-BUTLER BLDG	P14	228 m S
FENCE-TCF/PRKNG LOT	P28	259 m ESE

* Distance and direction are measured from centerline of Reactor Building to the monitoring location.

Figure 2.2-1 (continued)

Environmental TLD Locations Within the PNPS Protected Area

Figure 2.2-2

TLD and Air Sampling Locations: Within 1 Kilometer

TLD Station		Location*	Air Sampling Station		Location*
Description	Code	Distance/Direction	Description	Code	Distance/Direction
Zone 1 TLDs: 0-3 km					
BOAT LAUNCH WEST	BLW	0.11 km E	OVERLOOK AREA	OA	0.15 km W
OVERLOOK AREA	OA	0.15 km W	PEDESTRIAN BRIDGE	PB	0.21 km N
HEALTH CLUB	TC	0.15 km WSW	MEDICAL BUILDING	WS	0.23 km SSE
BOAT LAUNCH EAST	BLE	0.16 km ESE	EAST BREAKWATER	EB	0.44 km ESE
PEDESTRIAN BRIDGE	PB	0.21 km N	PROPERTY LINE	PL	0.54 km NNW
ISFSI DOSE #3	ISF-3	0.21 km W	W ROCKY HILL ROAD	WR	0.83 km WNW
SHOREFRONT SECURITY	P01	0.22 km NNW	E ROCKY HILL ROAD	ER	0.89 km SE
MEDICAL BUILDING	WS	0.23 km SSE			
ISFSI DOSE #2	ISF-2	0.29 km W			
PARKING LOT	CT	0.31 km SE			
ISFSI DOSE #1	ISF-1	0.35 km SW			
SHOREFRONT PARKING	PA	0.35 km NNW			
STATION A	A	0.37 km WSW			
STATION F	F	0.43 km NW			
STATION B	B	0.44 km S			
EAST BREAKWATER	EB	0.44 km ESE			
PNPS MET TOWER	PMT	0.44 km WNW			
STATION H	H	0.47 km SW			
STATION I	I	0.48 km WNW			
STATION L	L	0.50 km ESE			
STATION G	G	0.53 km W			
STATION D	D	0.54 km NW			
PROPERTY LINE	PL	0.54 km NNW			
STATION C	C	0.57 km ESE			
HALL'S BOG	HB	0.63 km SE			
GREENWOOD HOUSE	GH	0.65 km ESE			
W ROCKY HILL ROAD	WR	0.83 km WNW			
E ROCKY HILL ROAD	ER	0.89 km SE			

Figure 2.2-2 (continued)

TLD and Air Sampling Locations: Within 1 Kilometer

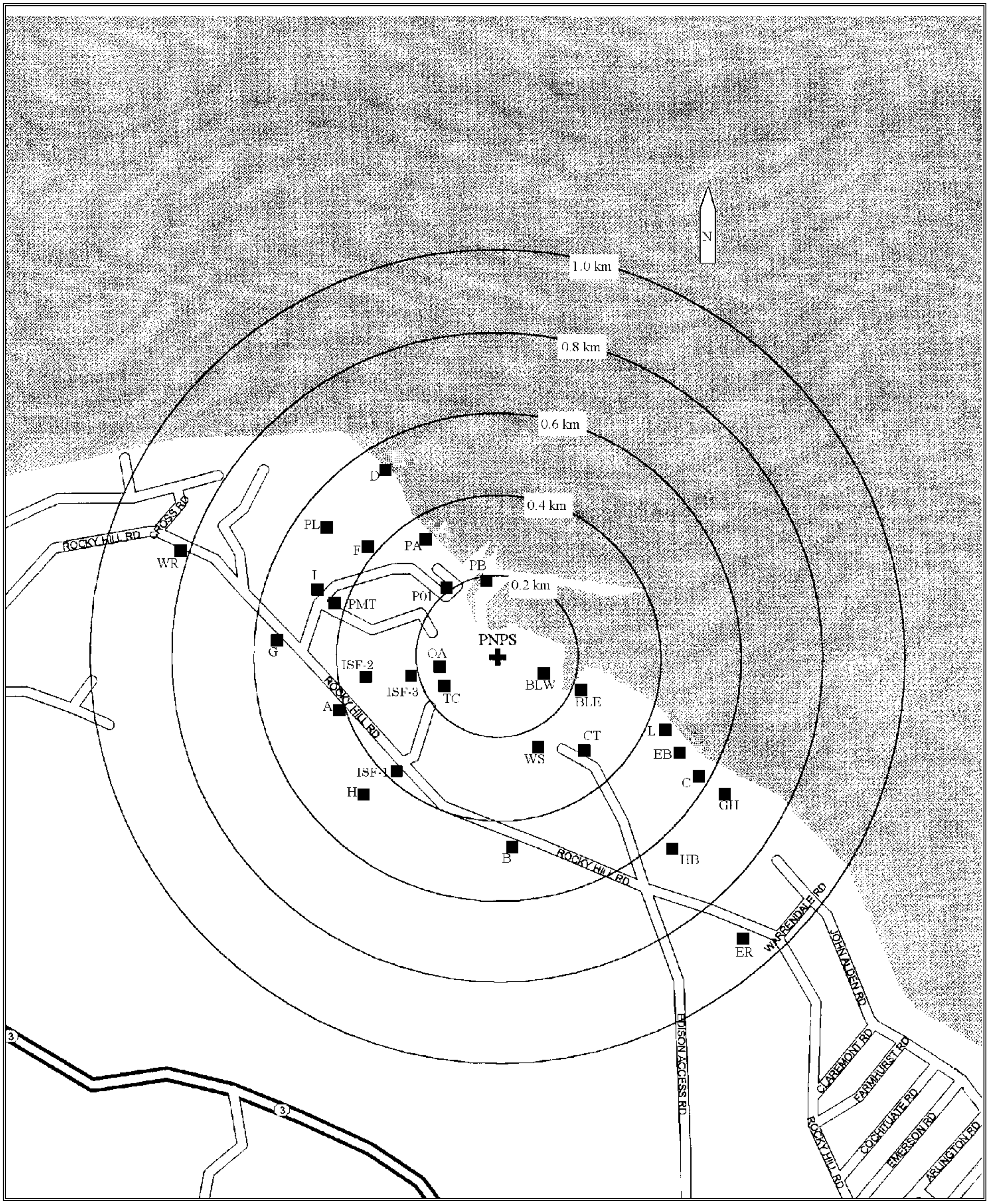


Figure 2.2-3

TLD and Air Sampling Locations: 1 to 5 Kilometers

TLD Station		Location*	Air Sampling Station		Location*
Description	Code	Distance/Direction	Description	Code	Distance/Direction
Zone 1 TLDs: 0-3 km					
MICROWAVE TOWER	MT	1.03 km SSW	CLEFT ROCK	CR	1.27 km SSW
CLEFT ROCK	CR	1.27 km SSW	MANOMET SUBSTATION	MS	3.60 km SSE
BAYSHORE/GATE RD	BD	1.34 km WNW			
MANOMET ROAD	MR	1.38 km S			
DIRT ROAD	DR	1.48 km SW			
EMERSON ROAD	EM	1.53 km SSE			
EMERSON/PRISCILLA	EP	1.55 km SE			
EDISON ACCESS ROAD	AR	1.59 km SSE			
BAYSHORE	BS	1.76 km W			
STATION E	E	1.86 km S			
JOHN GAULEY	JG	1.99 km W			
STATION J	J	2.04 km SSE			
WHITEHORSE ROAD	WH	2.09 km SSE			
PLYMOUTH YMCA	RC	2.09 km WSW			
STATION K	K	2.17 km S			
TAYLOR/THOMAS	TT	2.26 km SE			
YANKEE VILLAGE	YV	2.28 km WSW			
GOODWIN PROPERTY	GN	2.38 km SW			
RIGHT OF WAY	RW	2.83 km S			
TAYLOR/PEARL	TP	2.98 km SE			
Zone 2 TLDs: 3-8 km					
VALLEY ROAD	VR	3.26 km SSW			
MANOMET ELEM	ME	3.29 km SE			
WARREN/CLIFFORD	WC	3.31 km W			
RT.3A/BARTLETT RD	BB	3.33 km SSE			
MANOMET POINT	MP	3.57 km SE			
MANOMET SUBSTATION	MS	3.60 km SSE			
BEACHWOOD ROAD	BW	3.93 km SE			
PINES ESTATE	PT	4.44 km SSW			
EARL ROAD	EA	4.60 km SSE			
S PLYMOUTH SUBST	SP	4.62 km W			
ROUTE 3 OVERPASS	RP	4.81 km SW			
RUSSELL MILLS RD	RM	4.85 km WSW			

* Distance and direction are measured from centerline of Reactor Building to the monitoring location.

Figure 2.2-3 (continued)

TLD and Air Sampling Locations: 1 to 5 Kilometers

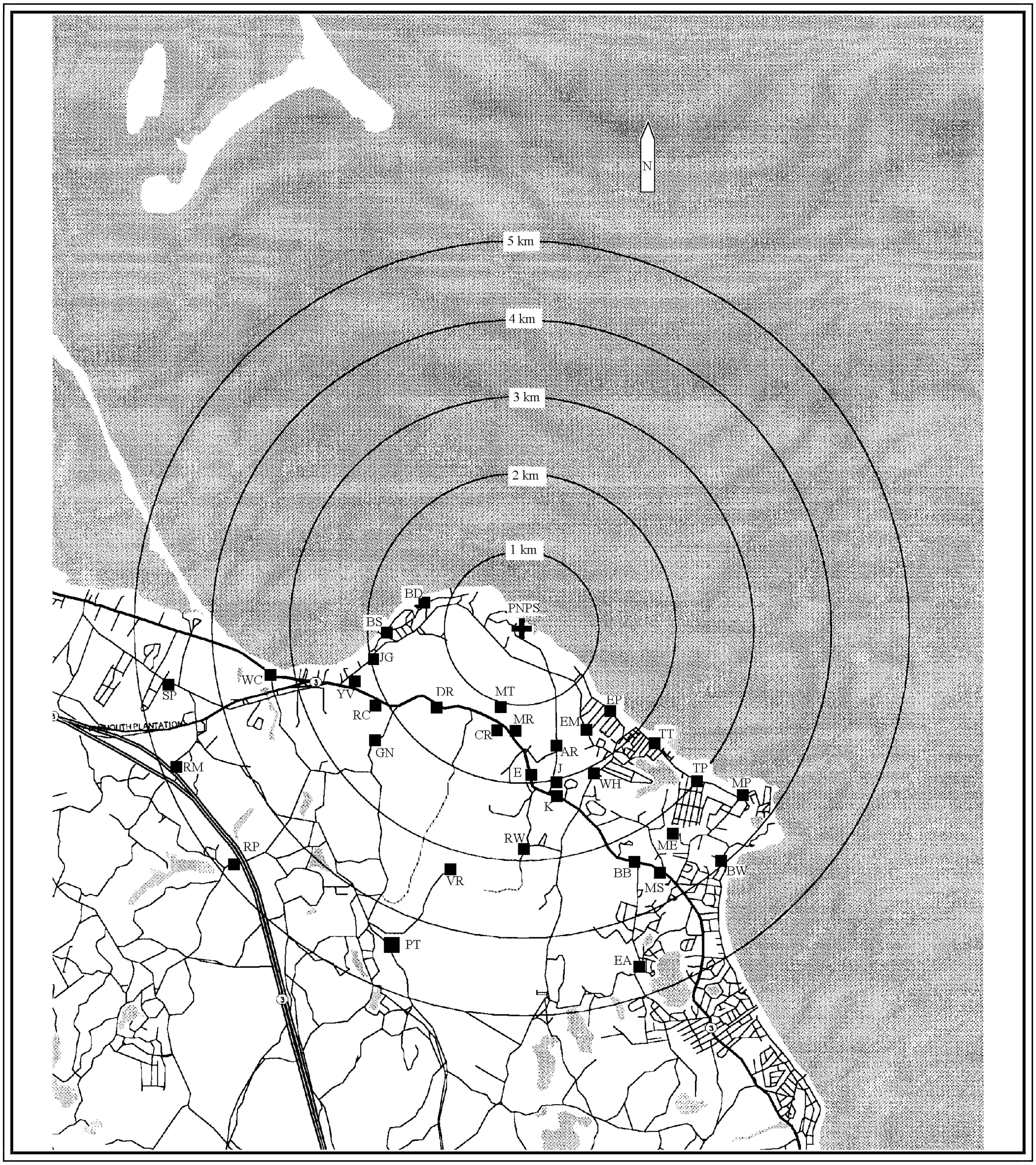


Figure 2.2-4

TLD and Air Sampling Locations: 5 to 25 Kilometers

TLD Station		Location*	Air Sampling Station		Location*
Description	Code	Distance/Direction	Description	Code	Distance/Direction
Zone 2 TLDs: 3-8 km					
HILLDALE ROAD	HD	5.18 km W	PLYMOUTH CENTER	PC	6.69 km W
MANOMET BEACH	MB	5.43 km SSE			
BEAVER DAM ROAD	BR	5.52 km S			
PLYMOUTH CENTER	PC	6.69 km W			
LONG POND/DREW RD	LD	6.97 km WSW			
HYANNIS ROAD	HR	7.33 km SSE			
MEMORIAL HALL	MH	7.58 km WNW			
SAQUISH NECK	SN	7.58 km NNW			
COLLEGE POND	CP	7.59 km SW			
Zone 3 TLDs: 8-15 km					
DEEP WATER POND	DW	8.59 km W			
LONG POND ROAD	LP	8.88 km SSW			
NORTH PLYMOUTH	NP	9.38 km WNW			
STANDISH SHORES	SS	10.39 km NW			
ELLISVILLE ROAD	EL	11.52 km SSE			
UP COLLEGE POND RD	UC	11.78 km SW			
SACRED HEART	SH	12.92 km W			
KING CAESAR ROAD	KC	13.11 km NNW			
BOURNE ROAD	BE	13.37 km S			
SHERMAN AIRPORT	SA	13.43 km WSW			
Zone 4 TLDs: >15 km					
CEDARVILLE SUBST	CS	15.93 km S			
KINGSTON SUBST	KS	16.15 km WNW			
LANDING ROAD	LR	16.46 km NNW			
CHURCH/WEST	CW	16.56 km NW			
MAIN/MEADOW	MM	17.02 km WSW			
DIV MARINE FISH	DMF	20.97 km SSE			

* Distance and direction are measured from centerline of Reactor Building to the monitoring location.

Figure 2.2-4 (continued)

TLD and Air Sampling Locations: 5 to 25 Kilometers

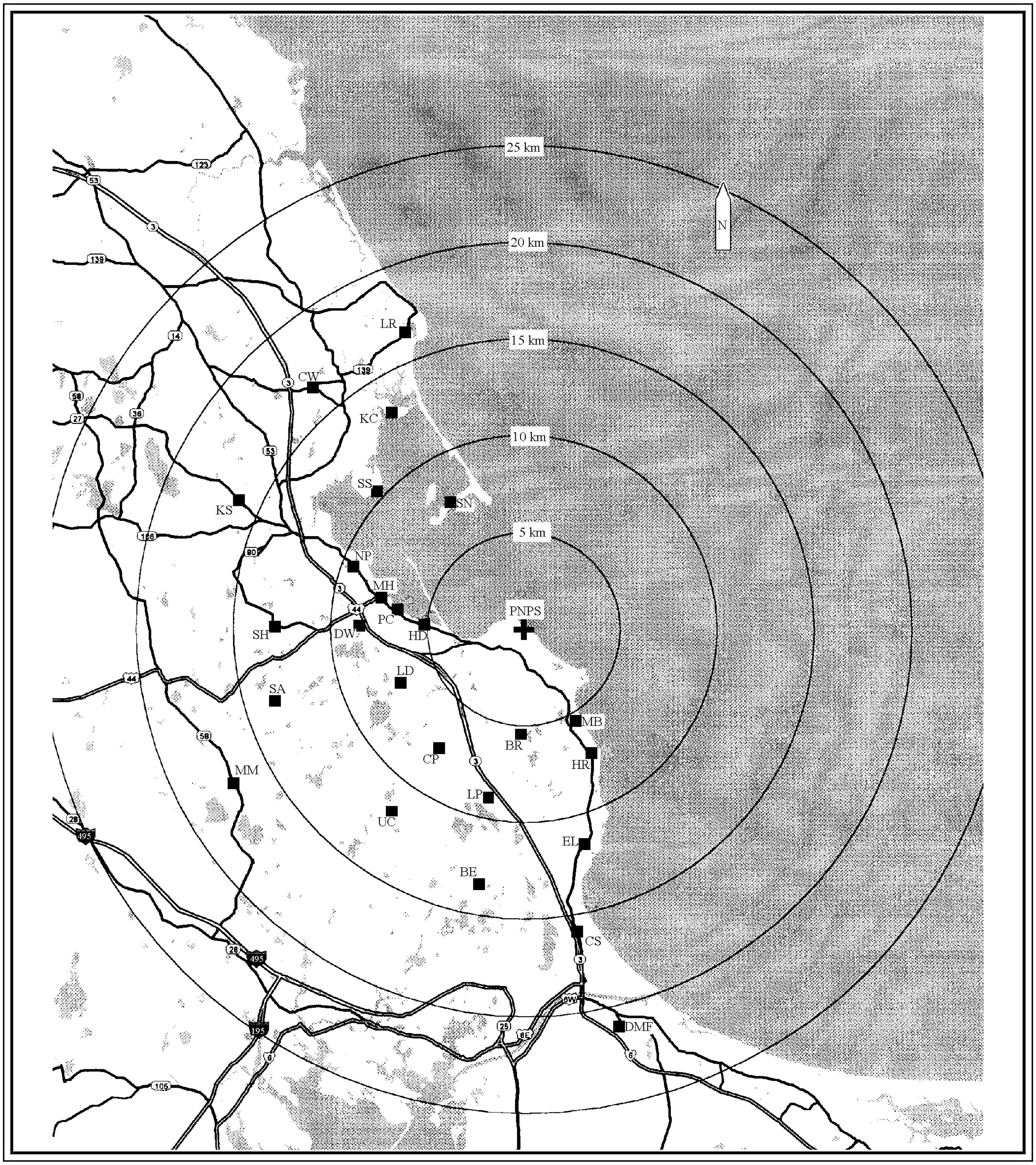


Figure 2.2-5

Terrestrial and Aquatic Sampling Locations

Description	Code	Distance/Direction*	Description	Code	Distance/Direction*
<u>FORAGE</u>			<u>SURFACE WATER</u>		
Plymouth County Farm	CF	5.6 km W	Discharge Canal	DIS	0.2 km N
Bridgewater Control	BF	31 km W	Bartlett Pond	BP	2.7 km SE
Hanson Farm Control	HN	34 km W	Powder Point Control	PP	13 km NNW
			<u>SEDIMENT</u>		
			Discharge Canal Outfall	DIS	0.8 km NE
			Plymouth Beach	PLB	4.0 km W
			Manomet Point	MP	3.3 km ESE
<u>VEGETABLES/VEGETATION</u>			Plymouth Harbor	PLY-H	4.1 km W
Site Boundary C	BC	0.5 km SW	Duxbury Bay Control	DUX-BAY	14 km NNW
Site Boundary B	BB	0.5 km ESE	Green Harbor Control	GH	16 km NNW
Rocky Hill Road	RH	0.9 km SE			
Site Boundary D	Bd	1.1 km S	<u>IRISH MOSS</u>		
Site Boundary A	BA	1.5 km SSW	Discharge Canal Outfall	DIS	0.7 km NNE
Clay Hill Road	CH	1.6 km W	Manomet Point	MP	4.0 km ESE
Brook Road	BK	2.9 km SSE	Ellisville	EL	12 km SSE
Beaver Dam Road	BD	3.4 km S	Brant Rock Control	BK	18 km NNW
Plymouth County Farm	CF	5.6 km W			
Hanson Farm Control	HN	34 km W	<u>SHELLFISH</u>		
Norton Control	NC	50 km W	Discharge Canal Outfall	DIS	0.7 km NNE
			Plymouth Harbor	PLY-H	4.1 km W
<u>CRANBERRIES</u>			Manomet Point	MP	4.0 km ESE
Bartlett Road Bog	BT	4.3 km SSE	Duxbury Bay Control	DUX-BAY	13 km NNW
Beaverdam Road Bog	MR	3.4 km S	Powder Point Control	PP	13 km NNW
Hollow Farm Bog Control	HF	16 km WNW	Green Harbor Control	GH	16 km NNW
			<u>LOBSTER</u>		
			Discharge Canal Outfall	DIS	0.5 km N
			Plymouth Beach	PLB	4.0 km W
			Plymouth Harbor	PLY-H	6.4 km WNW
			Duxbury Bay Control	DUX-BAY	11 km NNW
			<u>FISHES</u>		
			Discharge Canal Outfall	DIS	0.5 km N
			Plymouth Beach	PLB	4.0 km W
			Jones River Control	JR	13 km WNW
			Cape Cod Bay Control	CC-BAY	24 km ESE
			N River-Hanover Control	NR	24 km NNW
			Cataumet Control	CA	32 km SSW
			Provincetown Control	PT	32 km NE
			Buzzards Bay Control	BB	40 km SSW
			Priest Cove Control	PC	48 km SW
			Nantucket Sound Control	NS	48 km SSE
			Atlantic Ocean Control	AO	48 km E
			Vineyard Sound Control	MV	64 km SSW

* Distance and direction are measured from the centerline of the reactor to the sampling/monitoring location.

Figure 2.2-5 (continued)

Terrestrial and Aquatic Sampling Locations

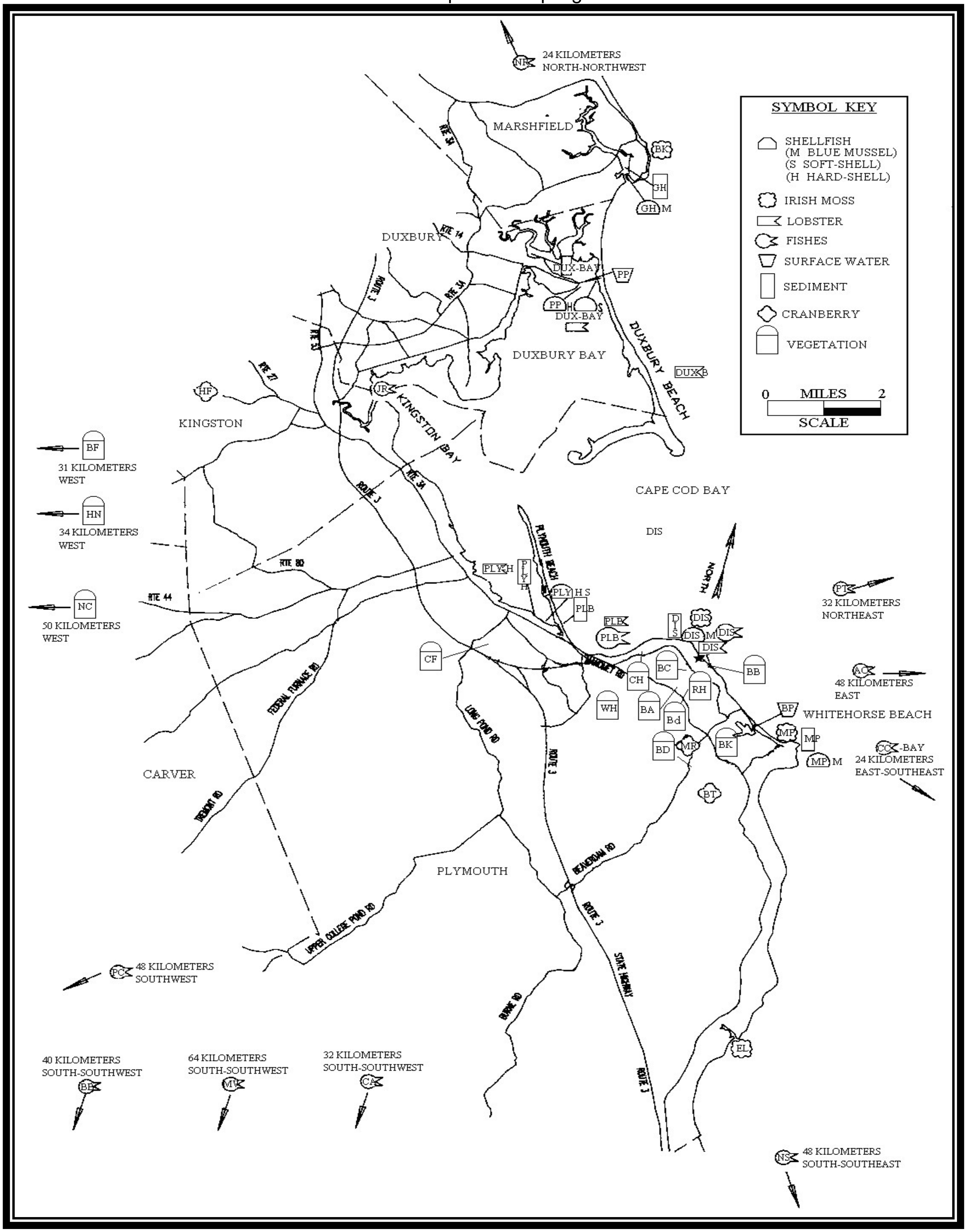


Figure 2.2-6

Environmental Sampling And Measurement Control Locations

Description	Code	Distance/Direction*	Description	Code	Distance/Direction*
TLD			SURFACE WATER		
Cedarville Substation	CS	16 km S	Powder Point Control	PP	13 km NNW
Kingston Substation	KS	16 km WNW			
Landing Road	LR	16 km NNW	SEDIMENT		
Church & West Street	CW	17 km NW	Duxbury Bay Control	DUX-BAY	14 km NNW
Main & Meadow Street	MM	17 km WSW	Green Harbor Control	GH	16 km NNW
Div. Marine Fisheries	DMF	21 km SSE			
East Weymouth Substation	EW	40 km NW	IRISH MOSS		
			Brant Rock Control	BK	18 km NNW
AIR SAMPLER					
East Weymouth Substation	EW	40 km NW	SHELLFISH		
			Duxbury Bay Control	DUX-BAY	13 km NNW
FORAGE			Powder Point Control	PP	13 km NNW
Bridgewater Control	BF	31 km W	Green Harbor Control	GH	16 km NNW
Hanson Farm Control	HN	34 km W			
			LOBSTER		
VEGETABLES/VEGETATION			Duxbury Bay Control	DUX-BAY	11 km NNW
Hanson Farm Control	HN	34 km W			
Norton Control	NC	50 km W	FISHES		
			Cape Cod Bay Control	CC-BAY	24 km ESE
			N River-Hanover Control	NR	24 km NNW
			Cataumet Control	CA	32 km SSW
			Provincetown Control	PT	32 km NE
			Buzzards Bay Control	BB	40 km SSW
			Nantucket Sound Control	NS	48 km SSE
			Atlantic Ocean Control	AO	48 km E
			Vineyard Sound Control	MV	64 km SSW

* Distance and direction are measured from the centerline of the reactor to the sampling/monitoring location.

Figure 2.2-6 (continued)

Environmental Sampling And Measurement Control Locations

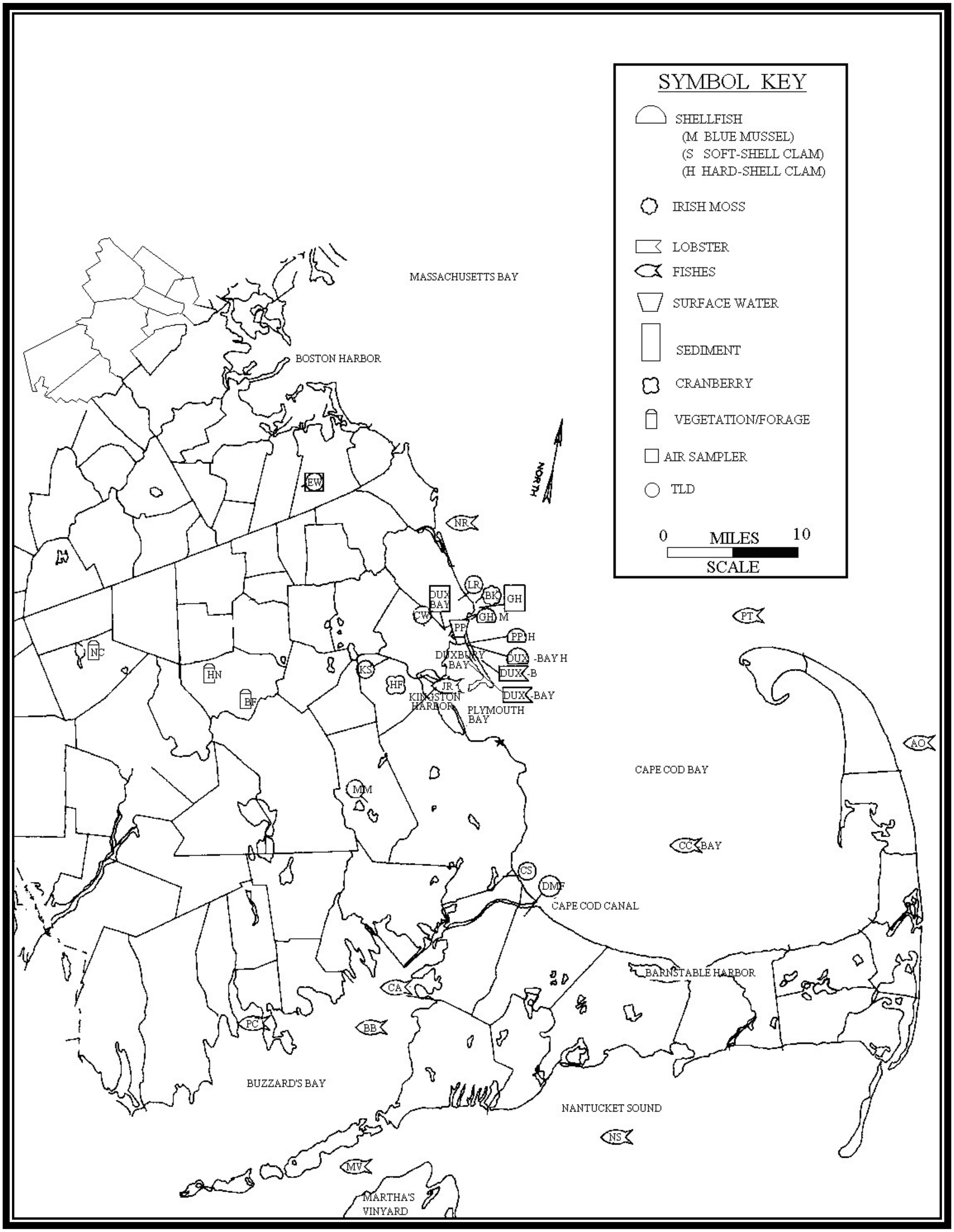


Figure 2.5-1
Airborne Gross-Beta Radioactivity Levels: Near Station Monitors

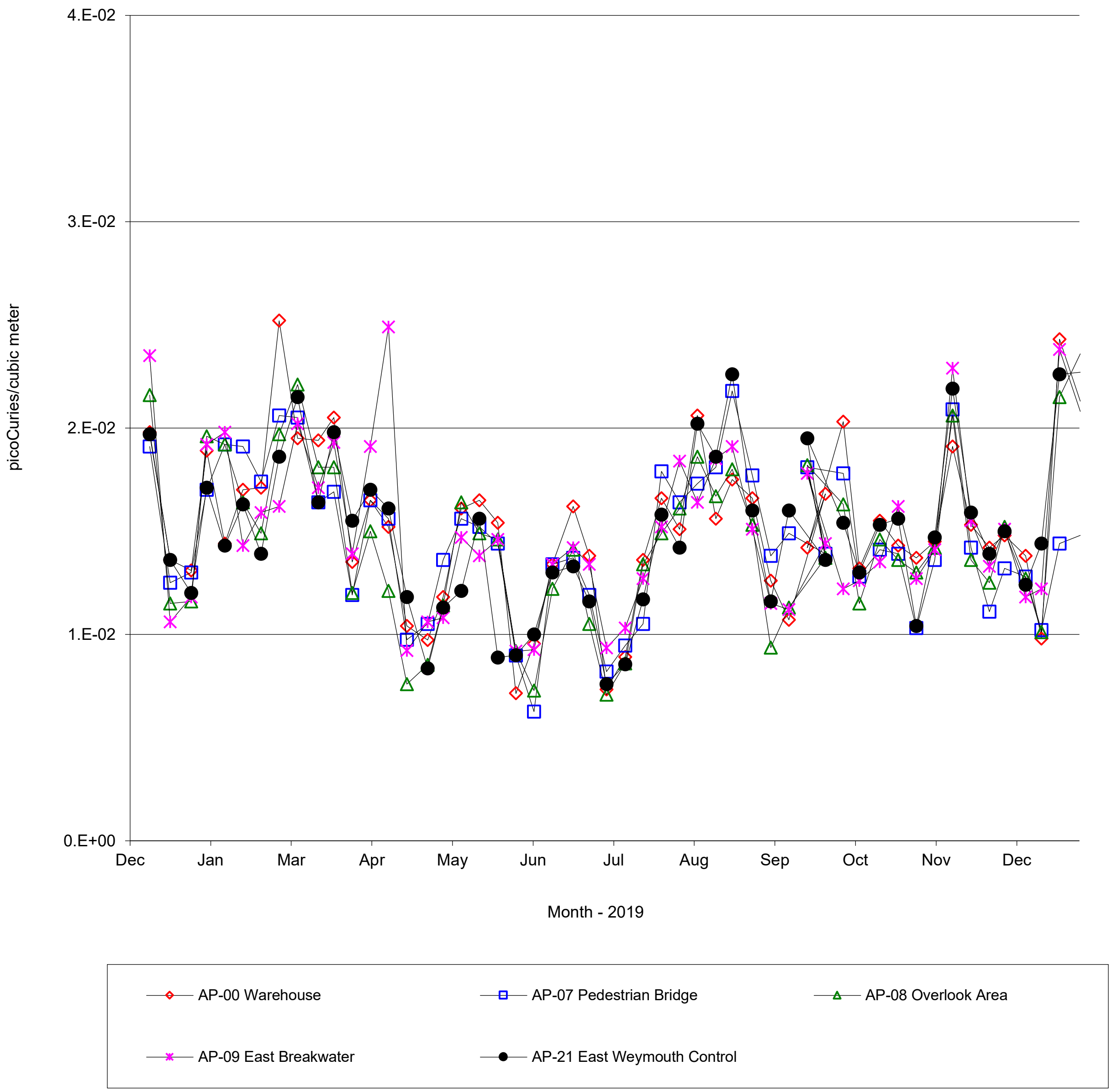


Figure 2.5-2
Airborne Gross-Beta Radioactivity Levels: Property Line Monitors

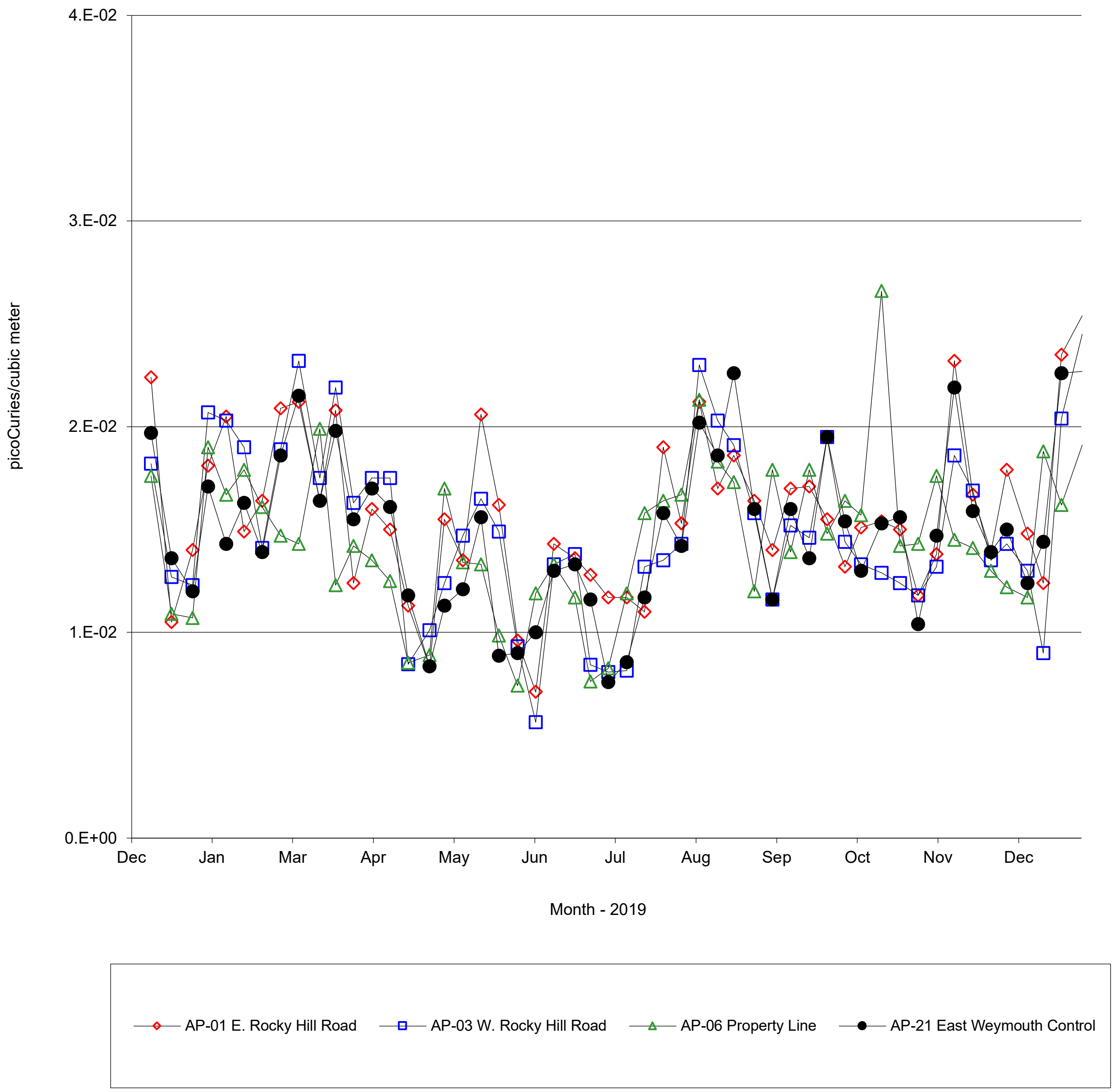
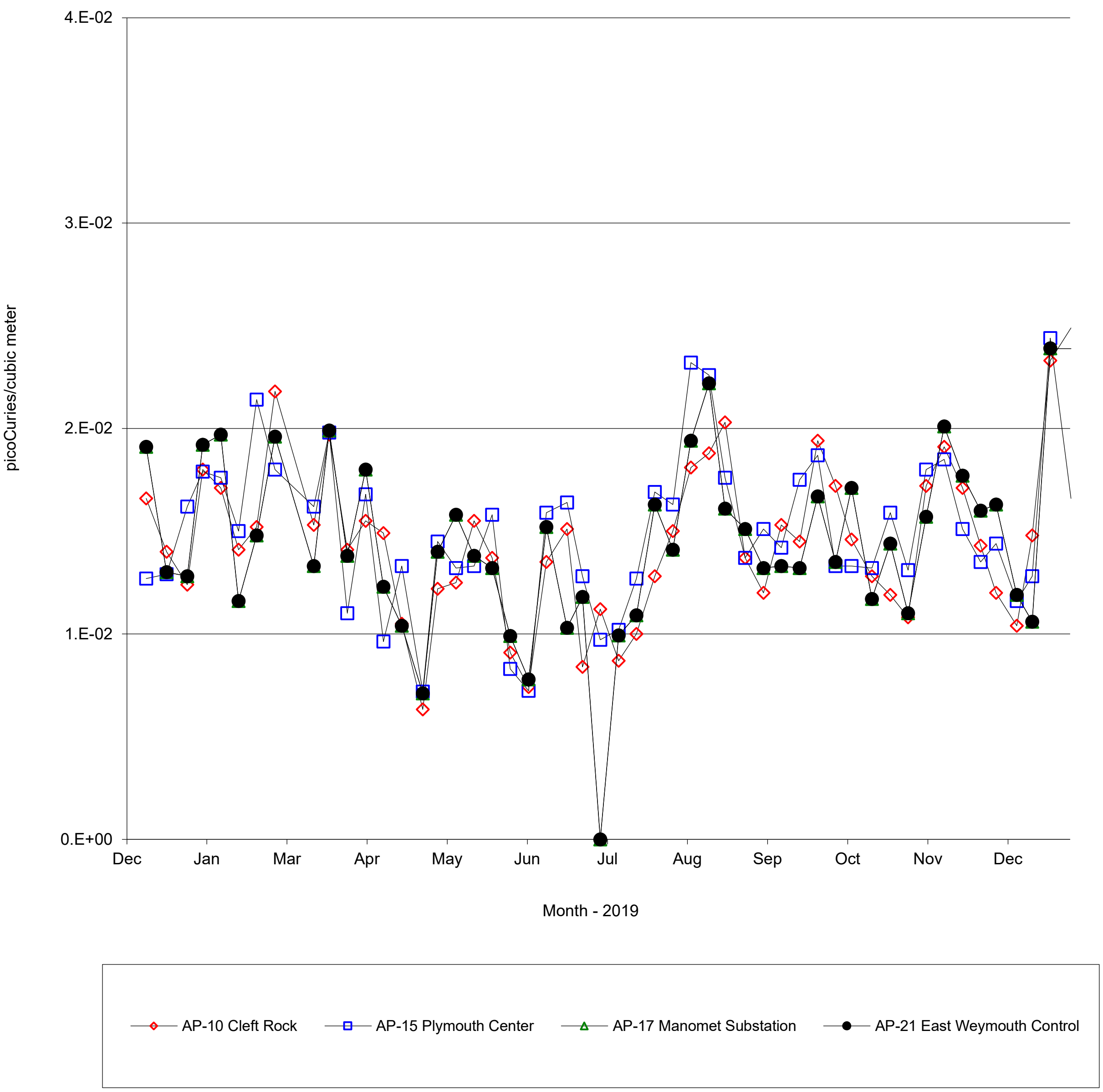


Figure 2.5-3
Airborne Gross-Beta Radioactivity Levels: Offsite Monitors



3.0 SUMMARY OF RADIOLOGICAL IMPACT ON HUMANS

The radiological impact to humans from the Pilgrim Station's radioactive liquid and gaseous releases has been estimated using two methods:

- calculations based on measurements of plant effluents; and
- calculations based on measurements of environmental samples.

The first method utilizes data from the radioactive effluents (measured at the point of release) together with conservative models that calculate the dispersion and transport of radioactivity through the environment to humans (Reference 7). The second method is based on actual measurements of radioactivity in the environmental samples and on dose conversion factors recommended by the Nuclear Regulatory Commission. The measured types and quantities of radioactive liquid and gaseous effluents released from Pilgrim Station during 2019 were reported to the Nuclear Regulatory Commission, copies of which are provided in Appendix B. The measured levels of radioactivity in the environmental samples that required dose calculations are listed in Appendix A.

The maximum individual dose from liquid effluents was calculated using the following radiation exposure pathways:

- shoreline external radiation during fishing and recreation at the Pilgrim Station Shorefront;
- external radiation from the ocean during boating and swimming; and
- ingestion of fish and shellfish.

For gaseous effluents, the maximum individual dose was calculated using the following radiation exposure pathways:

- external radiation from cloud shine and submersion in gaseous effluents;
- inhalation of airborne radioactivity;
- external radiation from soil deposition;
- consumption of vegetables; and
- consumption of milk and meat.

The results from the dose calculations based on PNPS operations are presented in Table 3.0-1. The dose assessment data presented were taken from the "Radioactive Effluent Release Report" for the period of January 1 through December 31, 2019 (Reference 17).

Table 3.0-1

Radiation Doses from 2019 Pilgrim Station Operations

Receptor	Maximum Individual Dose From Exposure Pathway - mrem/yr			
	Gaseous Effluents*	Liquid Effluents	Ambient Radiation**	Total
Total Body	0.0071	N/A	0.46	0.47
Thyroid	0.0073	N/A	0.46	0.47
Max. Organ	0.033	N/A	0.46	0.49

* Gaseous effluent exposure pathway includes combined dose from particulates, iodines and tritium in addition to noble gases, calculated at the nearest residence or receptor location yielding the highest projected dose from all exposure pathways.

** Ambient radiation dose for the hypothetical maximum-exposed individual at a location beyond the PNPS owner-controlled area yielding highest ambient radiation exposure value as measured with TLDs.

Two federal agencies establish dose limits to protect the public from radiation and radioactivity. The Nuclear Regulatory Commission (NRC) specifies a whole body dose limit of 100 mrem/yr to be received by the maximum exposed member of the general public. This limit is set forth in Section 1301, Part 20, Title 10, of the U.S. Code of Federal Regulations (10CFR20). By comparison, the Environmental Protection Agency (EPA) limits the annual whole body dose to 25 mrem/yr, which is specified in Section 10, Part 190, Title 40, of the Code of Federal Regulations (40CFR190).

Another useful "gauge" of radiation exposure is provided by the amount of dose a typical individual receives each year from natural and man-made sources of radiation. Such radiation doses are summarized in Table 1.2-1. The typical American receives approximately 620 mrem/yr from such sources.

As can be seen from the doses resulting from Pilgrim Station Operations during 2019, all values are well within the federal limits specified by the NRC and EPA. In addition, the calculated doses from PNPS operation represent only a fraction of a percent of doses from natural and man-made radiation.

In conclusion, the radiological impact of Pilgrim Station operations, whether based on actual environmental measurements or calculations made from effluent releases, would yield doses well within any federal dose limits set by the NRC or EPA. Such doses represent only a small percentage of the typical annual dose received from natural and man-made sources of radiation.

4.0 REFERENCES

1) United States of America, Code of Federal Regulations, Title 10, Part 50, Appendix A Criteria 64.

2) Donald T. Oakley, "Natural Radiation Exposure in the United States." U. S. Environmental Protection Agency, ORP/SID 72-1, June 1972.

3) National Council on Radiation Protection and Measurements, Report No. 93, "Ionizing Radiation Exposures of the Population of the United States," September 1987.

4) United States Nuclear Regulatory Commission, Regulatory Guide 8.29, "Instructions Concerning Risks from Occupational Radiation Exposure," Revision 0, July 1981.

5) Boston Edison Company, "Pilgrim Station" Public Information Brochure 100M, WNTHP, September 1989.

6) United States Nuclear Regulatory Commission, 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) Pilgrim Nuclear Power Station Offsite Dose Calculation Manual, Revision 9, June 2003.

8) United States of America, Code of Federal Regulations, Title 10, Part 20.1301.

9) United States of America, Code of Federal Regulations, Title 10, Part 50, Appendix I.

10) United States of America, Code of Federal Regulations, Title 40, Part 190.

11) United States Nuclear Regulatory Commission, Regulatory Guide 4.1, "Program for Monitoring Radioactivity in the Environs of Nuclear Power Plants," Revision 1, April 1975.

12) ICN/Tracerlab, "Pilgrim Nuclear Power Station Pre-operational Environmental Radiation Survey Program, Quarterly Reports," August 1968 to June 1972.

13) International Commission of Radiological Protection, Publication No. 43, "Principles of Monitoring for the Radiation Protection of the Population," May 1984.

14) United States Nuclear Regulatory Commission, NUREG-1302, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Boiling Water Reactors," April 1991.

15) United States Nuclear Regulatory Commission, Branch Technical Position, "An Acceptable Radiological Environmental Monitoring Program," Revision 1, November 1979.

16) Settlement Agreement Between Massachusetts Wildlife Federation and Boston Edison Company Relating to Offsite Radiological Monitoring - June 9, 1977.

17) Pilgrim Nuclear Power Station, “Annual Radioactive Effluent Release Report”, May 2019.

APPENDIX A

SPECIAL STUDIES

There were no environmental samples collected during 2019 that contained plant-related radioactivity. Therefore, no special studies were required to estimate dose from plant-related radioactivity.

APPENDIX B

Effluent Release Information

Table B.1
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Supplemental Information
January-December 2019

FACILITY: PILGRIM NUCLEAR POWER STATION **LICENSE: DPR-35**

1. REGULATORY LIMITS	
a. Fission and activation gases:	500 mrem/yr total body and 3000 mrem/yr for skin at site boundary
b,c. Iodines, particulates with half-life: >8 days, tritium	1500 mrem/yr to any organ at site boundary
d. Liquid effluents:	0.06 mrem/month for whole body and 0.2 mrem/month for any organ (without radwaste treatment)
2. EFFLUENT CONCENTRATION LIMITS	
a. Fission and activation gases:	10CFR20 Appendix B Table II
b. Iodines:	10CFR20 Appendix B Table II
c. Particulates with half-life > 8 days:	10CFR20 Appendix B Table II
d. Liquid effluents:	2E-04 μCi/mL for entrained noble gases; 10CFR20 Appendix B Table II values for all other radionuclides
3. AVERAGE ENERGY	Not Applicable
4. MEASUREMENTS AND APPROXIMATIONS OF TOTAL RADIOACTIVITY	
a. Fission and activation gases:	High purity germanium gamma spectroscopy for all gamma emitters; radiochemistry analysis for H-3, Fe-55 (liquid effluents), Sr-89, and Sr-90
b. Iodines:	
c. Particulates:	
d. Liquid effluents:	

5. BATCH RELEASES	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019
a. Liquid Effluents					
1. Total number of releases:	N/A	N/A	N/A	N/A	N/A
2. Total time period (minutes):	N/A	N/A	N/A	N/A	N/A
3. Maximum time period (minutes):	N/A	N/A	N/A	N/A	N/A
4. Average time period (minutes):	N/A	N/A	N/A	N/A	N/A
5. Minimum time period (minutes):	N/A	N/A	N/A	N/A	N/A
6. Average stream flow during periods of release of effluents into a flowing stream (Liters/min):	N/A	N/A	N/A	N/A	N/A
b. Gaseous Effluents	None	None	None	None	None
6. ABNORMAL RELEASES					
a. Liquid Effluents	None	None	None	None	None
b. Gaseous Effluents	None	None	None	None	None

Table B.2-A
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Gaseous Effluents - Summation of All Releases
January-December 2019

RELEASE PERIOD	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019	Est. Total Error
A. FISSION AND ACTIVATION GASES						
Total Release: Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	±22%
Average Release Rate: μCi/sec	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
Percent of Effluent Control Limit*	*	*	*	*	*	
B. IODINE-131						
Total Iodine-131 Release: Ci	8.44E-05	1.00E-04	0.00E+00	0.00E+00	1.85E-04	±20%
Average Release Rate: μCi/sec	1.07E-05	1.27E-05	0.00E+00	0.00E+00	5.85E-06	
Percent of Effluent Control Limit*	*	*	*	*	*	
C. PARTICULATES WITH HALF-LIVES > 8 DAYS						
Total Release: Ci	8.42E-05	1.00E-04	3.25E-05	8.02E-06	2.25E-04	±21%
Average Release Rate: μCi/sec	1.07E-05	1.27E-05	4.13E-06	1.02E-06	7.13E-06	
Percent of Effluent Control Limit*	*	*	*	*	*	
Gross Alpha Radioactivity: Ci	NDA	NDA	NDA	NDA	NDA	
D. TRITIUM						
Total Release: Ci	1.30E+01	9.45E+00	3.67E+00	4.45E+00	3.06E+01	±20%
Average Release Rate: μCi/sec	1.65E+00	1.20E+00	4.65E-01	5.64E-01	9.69E-01	
Percent of Effluent Control Limit*	*	*	*	*	*	
E. CARBON-14						
Total Release: Ci	2.06E+00	1.25E+00	0.00E+00	0.00E+00	3.31E+00	N/A
Average Release Rate: μCi/sec	2.61E-01	1.59E-01	0.00E+00	0.00E+00	1.05E-01	
Percent of Effluent Control Limit*	*	*	*	*	*	

Notes for Table B.2-A:

* Percent of Effluent Control Limit values based on dose assessments are provided in Section 6 of this report.

1. NDA stands for No Detectable Activity.
2. LLD for airborne gross alpha activity listed as NDA is 1E-11 μCi/cc.
3. N/A stands for not applicable.

Table B.2-B
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Gaseous Effluents – Elevated Release
January-December 2019

CONTINUOUS MODE RELEASES FROM ELEVATED RELEASE POINT					
Nuclide Released	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019
1. FISSION AND ACTIVATION GASES: Ci					
Ar-41	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Kr-85	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Kr-85m	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Kr-87	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Kr-88	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-131m	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-133	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-133m	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-135	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-135m	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-137	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-138	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. IODINES: Ci					
I-131	0.00E+00	1.46E-06	0.00E+00	0.00E+00	1.46E-06
I-133	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	0.00E+00	1.46E-06	0.00E+00	0.00E+00	1.46E-06
3. PARTICULATES WITH HALF-LIVES > 8 DAYS: Ci					
Cr-51	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Mn-54	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Fe-59	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Co-58	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Co-60	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Zn-65	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Sr-89	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Sr-90	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Ru-103	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cs-134	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cs-137	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Ba/La-140	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
4. TRITIUM: Ci					
H-3	1.93E-02	2.61E-02	0.00E+00	0.00E+00	4.53E-02
5. CARBON-14: Ci					
C-14	1.99E+00	1.22E+00	0.00E+00	0.00E+00	3.21E+00

Notes for Table B.2-B:

1. N/A stands for not applicable.
2. NDA stands for No Detectable Activity.
3. LLDs for airborne radionuclides listed as NDA are as follows:
   - Fission Gases: 1E-04 μCi/cc
   - Iodines: 1E-12 μCi/cc
   - Particulates: 1E-11 μCi/cc

Table B.2-B (continued)
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Gaseous Effluents – Elevated Release
January-December 2019

BATCH MODE RELEASES FROM ELEVATED RELEASE POINT					
Nuclide Released	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019
1. FISSION AND ACTIVATION GASES: Ci					
Ar-41	N/A	N/A	N/A	N/A	N/A
Kr-85	N/A	N/A	N/A	N/A	N/A
Kr-85m	N/A	N/A	N/A	N/A	N/A
Kr-87	N/A	N/A	N/A	N/A	N/A
Kr-88	N/A	N/A	N/A	N/A	N/A
Xe-131m	N/A	N/A	N/A	N/A	N/A
Xe-133	N/A	N/A	N/A	N/A	N/A
Xe-133m	N/A	N/A	N/A	N/A	N/A
Xe-135	N/A	N/A	N/A	N/A	N/A
Xe-135m	N/A	N/A	N/A	N/A	N/A
Xe-137	N/A	N/A	N/A	N/A	N/A
Xe-138	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A
2. IODINES: Ci					
I-131	N/A	N/A	N/A	N/A	N/A
I-133	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A
3. PARTICULATES WITH HALF-LIVES > 8 DAYS: Ci					
Cr-51	N/A	N/A	N/A	N/A	N/A
Mn-54	N/A	N/A	N/A	N/A	N/A
Fe-59	N/A	N/A	N/A	N/A	N/A
Co-58	N/A	N/A	N/A	N/A	N/A
Co-60	N/A	N/A	N/A	N/A	N/A
Zn-65	N/A	N/A	N/A	N/A	N/A
Sr-89	N/A	N/A	N/A	N/A	N/A
Sr-90	N/A	N/A	N/A	N/A	N/A
Ru-103	N/A	N/A	N/A	N/A	N/A
Cs-134	N/A	N/A	N/A	N/A	N/A
Cs-137	N/A	N/A	N/A	N/A	N/A
Ba/La-140	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A
4. TRITIUM: Ci					
H-3	N/A	N/A	N/A	N/A	N/A
5. CARBON-14: Ci					
C-14	N/A	N/A	N/A	N/A	N/A

Notes for Table B.2-B:

1. N/A stands for not applicable.
2. NDA stands for No Detectable Activity.
3. LLDs for airborne radionuclides listed as NDA are as follows:
   - Fission Gases: 1E-04 μCi/cc
   - Iodines: 1E-12 μCi/cc
   - Particulates: 1E-11 μCi/cc

Table B.2-C
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Gaseous Effluents – Ground-Level Release
January-December 2019

CONTINUOUS MODE RELEASES FROM GROUND-LEVEL RELEASE POINT					
Nuclide Released	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019
1. FISSION AND ACTIVATION GASES: Ci					
Ar-41	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Kr-85	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Kr-85m	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Kr-87	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Kr-88	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-131m	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-133	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-133m	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-135	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-135m	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-137	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Xe-138	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for period	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. IODINES: Ci					
I-131	8.44E-05	9.88E-05	0.00E+00	0.00E+00	1.83E-04
I-133	5.54E-04	5.31E-04	0.00E+00	0.00E+00	1.08E-03
Total for period	6.38E-04	6.29E-04	0.00E+00	0.00E+00	1.27E-03
3. PARTICULATES WITH HALF-LIVES > 8 DAYS: Ci					
Cr-51	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Mn-54	1.29E-05	3.07E-05	0.00E+00	0.00E+00	4.36E-05
Fe-59	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Co-58	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Co-60	3.64E-06	3.75E-05	0.00E+00	0.00E+00	4.11E-05
Zn-65	0.00E+00	0.00E+00	3.25E-05	8.02E-06	4.06E-05
Sr-89	3.02E-05	1.47E-05	0.00E+00	0.00E+00	4.48E-05
Sr-90	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Ru-103	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cs-134	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Cs-137	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Ba/La-140	3.75E-05	1.73E-05	0.00E+00	0.00E+00	5.48E-05
Total for period	8.42E-05	1.00E-04	3.25E-05	8.02E-06	2.25E-04
4. TRITIUM: Ci					
H-3	1.30E+01	9.43E+00	3.67E+00	4.45E+00	3.05E+01
5. CARBON-14: Ci					
C-14	6.17E-02	3.76E-02	0.00E+00	0.00E+00	9.93E-02

Notes for Table B.2-C:
1. N/A stands for not applicable.
2. NDA stands for No Detectable Activity.
3. LLDs for airborne radionuclides listed as NDA are as follows:
   Fission Gases: 1E-04 μCi/cc
   Iodines: 1E-12 μCi/cc
   Particulates: 1E-11 μCi/cc

Table B.2-C (continued)
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Gaseous Effluents – Ground-Level Release
January-December 2019

BATCH MODE RELEASES FROM GROUND-LEVEL RELEASE POINT					
Nuclide Released	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019
1. FISSION AND ACTIVATION GASES: Ci					
Ar-41	N/A	N/A	N/A	N/A	N/A
Kr-85	N/A	N/A	N/A	N/A	N/A
Kr-85m	N/A	N/A	N/A	N/A	N/A
Kr-87	N/A	N/A	N/A	N/A	N/A
Kr-88	N/A	N/A	N/A	N/A	N/A
Xe-131m	N/A	N/A	N/A	N/A	N/A
Xe-133	N/A	N/A	N/A	N/A	N/A
Xe-133m	N/A	N/A	N/A	N/A	N/A
Xe-135	N/A	N/A	N/A	N/A	N/A
Xe-135m	N/A	N/A	N/A	N/A	N/A
Xe-137	N/A	N/A	N/A	N/A	N/A
Xe-138	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A
2. IODINES: Ci					
I-131	N/A	N/A	N/A	N/A	N/A
I-133	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A
3. PARTICULATES WITH HALF-LIVES > 8 DAYS: Ci					
Cr-51	N/A	N/A	N/A	N/A	N/A
Mn-54	N/A	N/A	N/A	N/A	N/A
Fe-59	N/A	N/A	N/A	N/A	N/A
Co-58	N/A	N/A	N/A	N/A	N/A
Co-60	N/A	N/A	N/A	N/A	N/A
Zn-65	N/A	N/A	N/A	N/A	N/A
Sr-89	N/A	N/A	N/A	N/A	N/A
Sr-90	N/A	N/A	N/A	N/A	N/A
Ru-103	N/A	N/A	N/A	N/A	N/A
Cs-134	N/A	N/A	N/A	N/A	N/A
Cs-137	N/A	N/A	N/A	N/A	N/A
Ba/La-140	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A
4. TRITIUM: Ci					
H-3	N/A	N/A	N/A	N/A	N/A
5. CARBON-14: Ci					
C-14	N/A	N/A	N/A	N/A	N/A

Notes for Table B.2-C:

1. N/A stands for not applicable.
2. NDA stands for No Detectable Activity.
3. LLDs for airborne radionuclides listed as NDA are as follows:
   Fission Gases: 1E-04 μCi/cc
   Iodines: 1E-12 μCi/cc
   Particulates: 1E-11 μCi/cc

Table B.3-A
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Liquid Effluents - Summation of All Releases
January-December 2019

RELEASE PERIOD	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019	Est. Total Error
A. FISSION AND ACTIVATION PRODUCTS						
Total Release (not including tritium, gases, alpha): Ci	N/A	N/A	N/A	N/A	N/A	±12%
Average Diluted Concentration During Period: µCi/mL	N/A	N/A	N/A	N/A	N/A	
Percent of Effluent Concentration Limit*	N/A	N/A	N/A	N/A	N/A	
B. TRITIUM						
Total Release: Ci	N/A	N/A	N/A	N/A	N/A	±9.4%
Average Diluted Concentration During Period: µCi/mL	N/A	N/A	N/A	N/A	N/A	
Percent of Effluent Concentration Limit*	N/A	N/A	N/A	N/A	N/A	
C. DISSOLVED AND ENTRAINED GASES						
Total Release: Ci	N/A	N/A	N/A	N/A	N/A	±16%
Average Diluted Concentration During Period: µCi/mL	N/A	N/A	N/A	N/A	N/A	
Percent of Effluent Concentration Limit*	N/A	N/A	N/A	N/A	N/A	
D. GROSS ALPHA RADIOACTIVITY						
Total Release: Ci	N/A	N/A	N/A	N/A	N/A	±34%
E. VOLUME OF WASTE RELEASED PRIOR TO DILUTION						
Waste Volume: Liters	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	±5.7%
F. VOLUME OF DILUTION WATER USED DURING PERIOD						
Dilution Volume: Liters	1.30E+11	8.93E+10	5.26E+9	3.65E+9	2.29E+11	±10%

Notes for Table B.3-A:

* Additional percent of Effluent Control Limit values based on dose assessments are provided in Section 6 of this report.

1. N/A stands for not applicable.
2. NDA stands for No Detectable Activity.
3. LLD for dissolved and entrained gases listed as NDA is 1E-05 µCi/mL.
4. LLD for liquid gross alpha activity listed as NDA is 1E-07 µCi/mL.

Table B.3-B
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Liquid Effluents
January-December 2019

CONTINUOUS MODE RELEASES					
Nuclide Released	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019
1. FISSION AND ACTIVATION PRODUCTS: Ci					
Cr-51	N/A	N/A	N/A	N/A	N/A
Mn-54	N/A	N/A	N/A	N/A	N/A
Fe-55	N/A	N/A	N/A	N/A	N/A
Fe-59	N/A	N/A	N/A	N/A	N/A
Co-58	N/A	N/A	N/A	N/A	N/A
Co-60	N/A	N/A	N/A	N/A	N/A
Zn-65	N/A	N/A	N/A	N/A	N/A
Zn-69m	N/A	N/A	N/A	N/A	N/A
Sr-89	N/A	N/A	N/A	N/A	N/A
Sr-90	N/A	N/A	N/A	N/A	N/A
Zr/Nb-95	N/A	N/A	N/A	N/A	N/A
Mo/Tc-99	N/A	N/A	N/A	N/A	N/A
Ag-110m	N/A	N/A	N/A	N/A	N/A
Sb-124	N/A	N/A	N/A	N/A	N/A
I-131	N/A	N/A	N/A	N/A	N/A
I-133	N/A	N/A	N/A	N/A	N/A
Cs-134	N/A	N/A	N/A	N/A	N/A
Cs-137	N/A	N/A	N/A	N/A	N/A
Ba/La-140	N/A	N/A	N/A	N/A	N/A
Ce-141	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A
2. DISSOLVED AND ENTRAINED GASES: Ci					
Xe-133	N/A	N/A	N/A	N/A	N/A
Xe-135	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A

Notes for Table B.3-B:

1. N/A stands for not applicable.
2. NDA stands for No Detectable Activity.
3. LLDs for liquid radionuclides listed as NDA are as follows:
   - Strontium: 5E-08 μCi/mL
   - Iodines: 1E-06 μCi/mL
   - Noble Gases: 1E-05 μCi/mL
   - All Others: 5E-07 μCi/mL

Table B.3-B (continued)
Pilgrim Nuclear Power Station
Annual Radioactive Effluent Release Report
Liquid Effluents
January-December 2019

BATCH MODE RELEASES					
Nuclide Released	Jan-Mar 2019	Apr-Jun 2019	Jul-Sep 2019	Oct-Dec 2019	Jan-Dec 2019
1. FISSION AND ACTIVATION PRODUCTS: Ci					
Na-24	N/A	N/A	N/A	N/A	N/A
Cr-51	N/A	N/A	N/A	N/A	N/A
Mn-54	N/A	N/A	N/A	N/A	N/A
Fe-55	N/A	N/A	N/A	N/A	N/A
Fe-59	N/A	N/A	N/A	N/A	N/A
Co-58	N/A	N/A	N/A	N/A	N/A
Co-60	N/A	N/A	N/A	N/A	N/A
Zn-65	N/A	N/A	N/A	N/A	N/A
Zn-69m	N/A	N/A	N/A	N/A	N/A
Sr-89	N/A	N/A	N/A	N/A	N/A
Sr-90	N/A	N/A	N/A	N/A	N/A
Zr/Nb-95	N/A	N/A	N/A	N/A	N/A
Mo/Tc-99	N/A	N/A	N/A	N/A	N/A
Ag-110m	N/A	N/A	N/A	N/A	N/A
Sb-124	N/A	N/A	N/A	N/A	N/A
I-131	N/A	N/A	N/A	N/A	N/A
I-133	N/A	N/A	N/A	N/A	N/A
Cs-134	N/A	N/A	N/A	N/A	N/A
Cs-137	N/A	N/A	N/A	N/A	N/A
Ba/La-140	N/A	N/A	N/A	N/A	N/A
Ce-141	N/A	N/A	N/A	N/A	N/A
Ce-144	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A
2. DISSOLVED AND ENTRAINED GASES: Ci					
Xe-133	N/A	N/A	N/A	N/A	N/A
Xe-135	N/A	N/A	N/A	N/A	N/A
Total for period	N/A	N/A	N/A	N/A	N/A

Notes for Table B.3-B:

1. N/A stands for not applicable.
2. NDA stands for No Detectable Activity.
3. LLDs for liquid radionuclides listed as NDA are as follows:
   - Strontium: 5E-08 µCi/mL
   - Iodines: 1E-06 µCi/mL
   - Noble Gases: 1E-05 µCi/mL
   - All Others: 5E-07 µCi/mL

APPENDIX C

LAND USE CENSUS RESULTS

The annual land use census for gardens and milk and meat animals in the vicinity of Pilgrim Station was performed on June 18th, 2019. The census was conducted by driving along each improved road/street in the Plymouth area within 5 kilometers (3 miles) of Pilgrim Station to survey for visible gardens with an area of greater than 500 square feet. In compass sectors where no gardens were identified within 5 km (SSW, WNW, N, NW, and NNW sectors), the survey was extended to 8 km (5 mi). A total of 20 gardens were identified in the vicinity of Pilgrim Station. In addition, the Town of Plymouth Animal Inspector was contacted for information regarding milk and meat animals.

Atmospheric deposition (D/Q) values at the locations of the identified gardens were compared to those for the existing sampling program locations. These comparisons enabled PNPS personnel to ascertain the best locations for monitoring for releases of airborne radionuclides. Samples of naturally-growing vegetation were collected at the site boundary in the ESE and SE sectors to monitor for atmospheric deposition in the vicinity of the nearest resident in the SE sector.

In addition to these special sampling locations identified and sampled in conjunction with the 2019 land use census, samples were also collected from control locations in Bridgewater (31 km W) and Sandwich (21 km SSE).

Samples of naturally-growing vegetation were also collected in the vicinity of the site boundary locations yielding the highest deposition (D/Q) factors for each of the two release points. These locations, and their distance and direction relative to the PNPS Reactor Building, are as follows:

Highest Main Stack D/Q:	1.2 km SSW
Highest Reactor Building Vent D/Q:	0.6 km SE
2nd highest D/Q, both release points:	1.1 km S

No new milk or meat animals were identified during the land use census. In addition, the Town of Plymouth Animal Inspector stated that their office is not aware of any animals at locations other than the Plimoth Plantation. Although milk sampling is not performed at Plimoth Plantation, effluent dose calculations are performed for this location assuming the presence of a milk ingestion pathway, as part of the Annual Radioactive Effluent Release Report (Reference 17).

APPENDIX D

ENVIRONMENTAL MONITORING PROGRAM DISCREPANCIES

There were a number of instances during 2019 in which inadvertent issues were encountered in the collection of environmental samples. All of these issues were minor in nature and did not have an adverse effect on the results or integrity of the monitoring program. The PNPS TLD placement still far exceeds that prescribed by NUREG-1302. Details of these various problems are given below.

Within the air sampling program, there were a few instances in which continuous sampling was interrupted at the ten airborne sampling locations during 2019. Most of these interruptions were due to short-term power losses and were sporadic and of limited duration (less than 24 hours out of the weekly sampling period). Such events did not have any significant impact on the scope and purpose of the sampling program, and lower limits of detection (LLDs) were met for both airborne particulates and iodine-131 on 527 filters/cartridges collected. In the fourth quarter of 2019, following the permanent shutdown of the station, the use of charcoal cartridges was discontinued as iodine had decayed away.

Out of 572 filters (11 locations * 52 weeks), 569 samples were collected and analyzed during 2019. In accordance with ODCM Table 3.5-1, offsite REMP air particulate filters and charcoal cartridges are to be collected at a weekly interval. Weekly is defined as once every seven days with a one-day grace period before and after the scheduled date. Sample station Cleft Rock and Manoment Substation for Week 09 was collected on 13-Mar-2019, meaning that samples had a collection period of 14 days due to a lack of access to the area. (CR-2019-1382) Sample station Property Line and Pebestrian Bridge for Week 51 was collected on 31-Dec-2019, meaning that samples had a collection period of 14 days due to a lack of access to the area. It must be emphasized that the station continued to sample during the duration and no monitoring time was lost.

The configuration of air samplers that had been in use at Pilgrim Station since the early 1980s, was replaced between June and August of 2012. Both the pumps and dry gas meters were replaced, and operating experience since changing over to the new configuration has been favorable. Although the occurrence of pump failures and gas meter problems have been largely eliminated, the new configuration is still subject to trips of the ground fault interrupt circuit (GFCI). Such problems can be encountered at air samplers located at the East Breakwater and Pedestrian Bridge. Both of these locations are immediately adjacent to the shoreline and are subject to significant wind-blown salt water, and are prone to tripping of the GFCI. The following table contains a listing of problems encountered with air sampling stations during 2019, many of which resulted in loss of more than 24 hours during the sampling period. All problems were rectified by a ground fault reset or minor maintenance.

Location	Sampling Period	Sampling Hours Lost	Problem Description/Resolution
PL	2/26-3/5	145	Ground Fault Circuit Interrupt (GFCI) tripped LLDs not Met due to low volume
EB	4/2-4/9	92	Sample Pump power supply failure
WR	7/9-7/16	49	Loss of power to sample station
PL	10/15-10/29	221	Ground Fault Circuit Interrupt (GFCI) tripped due to downed tree on power line; sample volume insufficient to meet LLDs
PC	12/23-12/31	No hours lost	2 week sample. No access to sample location

Despite the lower-than-normal sampling volumes in the various instances involving power interruptions and equipment failures, required LLDs were met on 566 of the 569 particulate filters, and 5 of the 527 of the iodine cartridges collected during 2019. When viewed collectively during the entire year of 2019, the following sampling recoveries were achieved in the airborne sampling program:

Location	Recovery	Location	Recovery	Location	Recovery
WS	99.6%	PB	99.6%	PC	97.5%
ER	99.3%	OA	99.3%	MS	99.6%
WR	99.1%	EB	98.6%	EW	99.7%
PL	95.1%	CR	99.6%		

An alternate location had to be found for sampling control vegetable samples in the Bridgewater area. In past years, samples had been collected at the Bridgewater County Farm, associated with the Bridgewater Correctional Facility. Due to loss of state funding for garden projects during 2006, no garden was grown. An alternate location was found at the Hanson Farm in Bridgewater, located in the same compass sector, and at approximately the same distance as the Bridgewater County Farm. Additional samples of naturally-occurring vegetation were collected from a distant control location in Sandwich. As expected for control samples, vegetables and vegetation collected at these locations only contained naturally-occurring radioactivity (Be-7 and K-40).No radionuclides attributed to PNPS operations were detected in any of the edible crop samples collected during 2019.

Naturally-growing leafy vegetation (grass, leaves from trees and bushes, etc.) was collected near some gardens identified during the annual land use census. Due to the unavailability of crops grown in several of these gardens, these substitute samples were collected as near as practicable to the gardens of interest. No radionuclides attributed to PNPS operations were detected in any of the samples. Additional details regarding the land use census can be found in Appendix C of this report.

Group III fishes, consisting of alewife, smelt, or striped bass are normally collected once each year in the summer from the vicinity of the Discharge Canal Outfall. A resident population of harbor seals inhabiting the rock breakwater outboard of Pilgrim Station resulted in missed samples being collected during 2019, as the seals would intercept and eat any caught fish before they could be landed. Repeated and concerted efforts were made to collect these species, but failed to produce any samples. In addition to predation the station experienced a decrease in discharge flow following the permenant shutdown of the station. With less heat in the discharge plume the fish species that gravitated to the warmer water moved to other areas, as a result there were missed fish sampling.

In summary, the various problems encountered in collecting and analyzing environmental samples during 2019 were relatively minor when viewed in the context of the entire monitoring program. These discrepancies were promptly corrected when issue was identified, where possible. None of the discrepancies resulted in an adverse impact on the overall monitoring program.

APPENDIX E

Environmental Dosimetry Company
Annual 2019 Quality Assurance Status Report

ENVIRONMENTAL DOSIMETRY COMPANY

ANNUAL QUALITY ASSURANCE STATUS REPORT

January - December 2019

Prepared By: ______________________ Date: 3/25/20

Approved By: ______________________ Date: 3/25/20

Environmental Dosimetry Company
10 Ashton Lane
Sterling, MA 01564

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EXECUTIVE SUMMARY

Routine quality control (QC) testing was performed for dosimeters issued by the Environmental Dosimetry Company (EDC) .

During this annual period100% (72/72) of the individual dosimeters, evaluated against the EDC internal performance acceptance criteria (high-energy photons only), met the criterion for accuracy and 100% (72/72) met the criterion for precision (Table 1). In addition, 100% (12/12) of the dosimeter sets evaluated against the internal tolerance limits met EDC acceptance criteria (Table 2) and 100% (6/6) of independent testing passed the performance criteria (Table 3). Trending graphs, which evaluate performance statistic for high-energy photon irradiations and co-located stations are given in Appendix A.

One internal assessment was performed in 2019.There were no findings.

I. INTRODUCTION

The TLD systems at the Environmental Dosimetry Company (EDC) are calibrated and operated to ensure consistent and accurate evaluation of TLDs. The quality of the dosimetric results reported to EDC clients is ensured by in-house performance testing and independent performance testing by EDC clients, and both internal and client directed program assessments.

The purpose of the dosimetry quality assurance program is to provide performance documentation of the routine processing of EDC dosimeters. Performance testing provides a statistical measure of the bias and precision of dosimetry processing against a reliable standard, which in turn points out any trends or performance changes. Two programs are used:

A. QC Program

Dosimetry quality control tests are performed on EDC Panasonic 814 Environmental dosimeters. These tests include: (1) the in-house testing program coordinated by the EDC QA Officer and (2) independent test perform by EDC clients. In-house test are performed using six pairs of 814 dosimeters, a pair is reported as an individual result and six pairs are reported as the mean result.Results of these tests are described in this report.

Excluded from this report are instrumentation checks. Although instrumentation checks represent an important aspect of the quality assurance program, they are not included as process checks in this report. Instrumentation checks represent between 5-10% of the TLDs processed.

B. QA Program

An internal assessment of dosimetry activities is conducted annually by the Quality Assurance Officer (Reference 1). The purpose of the assessment is to review procedures, results, materials or components to identify opportunities to improve or enhance processes and/or services.

II. PERFORMANCE EVALUATION CRITERIA

A. Acceptance Criteria for Internal Evaluations

1. Bias

For each dosimeter tested, the measure of bias is the percent deviation of the reported result relative to the delivered exposure. The percent deviation relative to the delivered exposure is calculated as follows:

$$\frac{\left(H_i' - H_i\right)}{H_i}100$$

where:

H_i' = the corresponding reported exposure for the i^{th} dosimeter (i.e., the reported exposure)

H_i = the exposure delivered to the i^{th} irradiated dosimeter (i.e., the delivered exposure)

2. Mean Bias

For each group of test dosimeters, the mean bias is the average percent deviation of the reported result relative to the delivered exposure. The mean percent deviation relative to the delivered exposure is calculated as follows:

$$\sum\left(\frac{(H_i' - H_i)}{H_i}\right)100\left(\frac{1}{n}\right)$$

where:

H_i' = the corresponding reported exposure for the i^{th} dosimeter (i.e., the reported exposure)

H_i = the exposure delivered to the i^{th} irradiated test dosimeter (i.e., the delivered exposure)

n = the number of dosimeters in the test group

3. Precision

For a group of test dosimeters irradiated to a given exposure, the measure of precision is the percent deviation of individual results relative to the mean reported exposure. At least two values are required for the determination of precision. The measure of precision for the i^{th} dosimeter is:

$$\left(\frac{(H_i' - \bar{H})}{\bar{H}}\right)100$$

where:

H_i' = the reported exposure for the i^{th} dosimeter (i.e., the reported exposure)

$\bar{H}$ = the mean reported exposure; i.e., $\bar{H} = \sum H_i'\left(\frac{1}{n}\right)$

n = the number of dosimeters in the test group

4. EDC Internal Tolerance Limits

All evaluation criteria are taken from the "EDC Quality System Manual," (Reference 2). These criteria are only applied to individual test dosimeters irradiated with high-energy photons (Cs-137) and are as follows for Panasonic Environmental dosimeters: ± 15% for bias and ± 12.8% for precision.

B. QC Investigation Criteria and Result Reporting

EDC Quality System Manual (Reference 2) specifies when an investigation is required due to a QC analysis that has failed the EDC bias criteria. The criteria are as follows:

1. No investigation is necessary when an individual QC result falls outside the QC performance criteria for accuracy.

2. Investigations are initiated when the mean of a QC processing batch is outside the performance criterion for bias.

C. Reporting of Environmental Dosimetry Results to EDC Customers

1. All results are to be reported in a timely fashion.

2. If the QA Officer determines that an investigation is required for a process, the results shall be issued as normal. If the QC results prompting the investigation have a mean bias from the known of greater than ±20%, the results shall be issued with a note indicating that they may be updated in the future, pending resolution of a QA issue.

3. Environmental dosimetry results do not require updating if the investigation has shown that the mean bias between the original results and the corrected results, based on applicable correction factors from the investigation, does not exceed ±20%.

III. DATA SUMMARY FOR ISSUANCE PERIOD JANUARY-DECEMBER 2019

A. General Discussion

Results of performance tests conducted are summarized and discussed in the following sections. Summaries of the performance tests for the reporting period are given in Tables 1 through 3 and Figures 1 through 4.

Table 1 provides a summary of individual dosimeter results evaluated against the EDC internal acceptance criteria for high-energy photons only. During this period100% (72/72) of the individual dosimeters, evaluated against these criteria, met the tolerance limits for accuracy and 100% (72/72) met the criterion for precision. A graphical interpretation is provided in Figures 1 and 2.

Table 2 provides the bias and standard deviation results for each group (N=6) of dosimeters evaluated against the internal tolerance criteria. Overall,100% (12/12) of the dosimeter sets, evaluated against the internal tolerance performance criteria, met these criteria. A graphical interpretation is provided in Figure 3.

Table 3 presents the independent blind spike results for dosimeters processed during this annual period. All results passed the performance acceptance criterion. Figure 4 is a graphical interpretation of Seabrook Station blind co-located station results.

B. Result Trending

One of the main benefits of performing quality control tests on a routine basis is to identify trends or performance changes. The results of the Panasonic environmental dosimeter performance tests are presented in Appendix A. The results are evaluated against each of the performance criteria listed in Section II, namely: individual dosimeter accuracy, individual dosimeter precision, and mean bias.

All of the results presented in Appendix A are plotted sequentially by processing date.

IV. STATUS OF EDC CONDITION REPORTS (CR)

No condition reports were issued during this annual period.

V. STATUS OF AUDITS/ASSESSMENTS

1. Internal

EDC Internal Quality Assurance Assessment was conducted during the fourth quarter 2019. There were no findings identified.

2. External

None.

VI. PROCEDURES AND MANUALS REVISED DURING JANUARY - DECEMBER 2019

No procedures or manuals were revised in 2019.

VII. CONCLUSION AND RECOMMENDATIONS

The quality control evaluations continue to indicate the dosimetry processing programs at the EDC satisfy the criteria specified in the Quality System Manual. The EDC demonstrated the ability to meet all applicable acceptance criteria.

VIII. REFERENCES

1. EDC Quality Control and Audit Assessment Schedule, 2019.

2. EDC Manual 1, Quality System Manual, Rev. 3, August 1, 2017.

TABLE 1

PERCENTAGE OF INDIVIDUAL DOSIMETERS THAT PASSED EDC INTERNAL CRITERIA JANUARY – DECEMBER 2019[(1), (2)]

Dosimeter Type	Number Tested	% Passed Bias Criteria	% Passed Precision Criteria
Panasonic Environmental	72	100	100

[(1)]This table summarizes results of tests conducted by EDC.
[(2)]Environmental dosimeter results are free in air.

TABLE 2

MEAN DOSIMETER ANALYSES (N=6) JANUARY – DECEMBER 2019[(1), (2)]

Process Date	Exposure Level	Mean Bias %	Standard Deviation %	Tolerance Limit +/- 15%
4/25/2019	26	1.8	1.7	Pass
4/29/2019	51	3.1	1.5	Pass
5/04/2019	85	-0.4	1.4	Pass
7/28/2019	75	5.9	1.1	Pass
7/30/2019	32	2.8	1.2	Pass
8/4/2019	107	-0.7	1.2	Pass
10/25/2019	64	1.8	1.2	Pass
11/04/2019	90	-0.5	1.8	Pass
11/05/2019	117	3.0	1.7	Pass
01/20/2020	45	1.0	2.0	Pass
01/30/2020	57	1.8	2.6	Pass
02/17/2020	121	-2.6	2.4	Pass

[(1)]This table summarizes results of tests conducted by EDC for TLDs issued in 2019.
[(2)]Environmental dosimeter results are free in air.

TABLE 3
SUMMARY OF INDEPENDENT DOSIMETER TESTING JANUARY – DECEMBER 2019[(1), (2)]

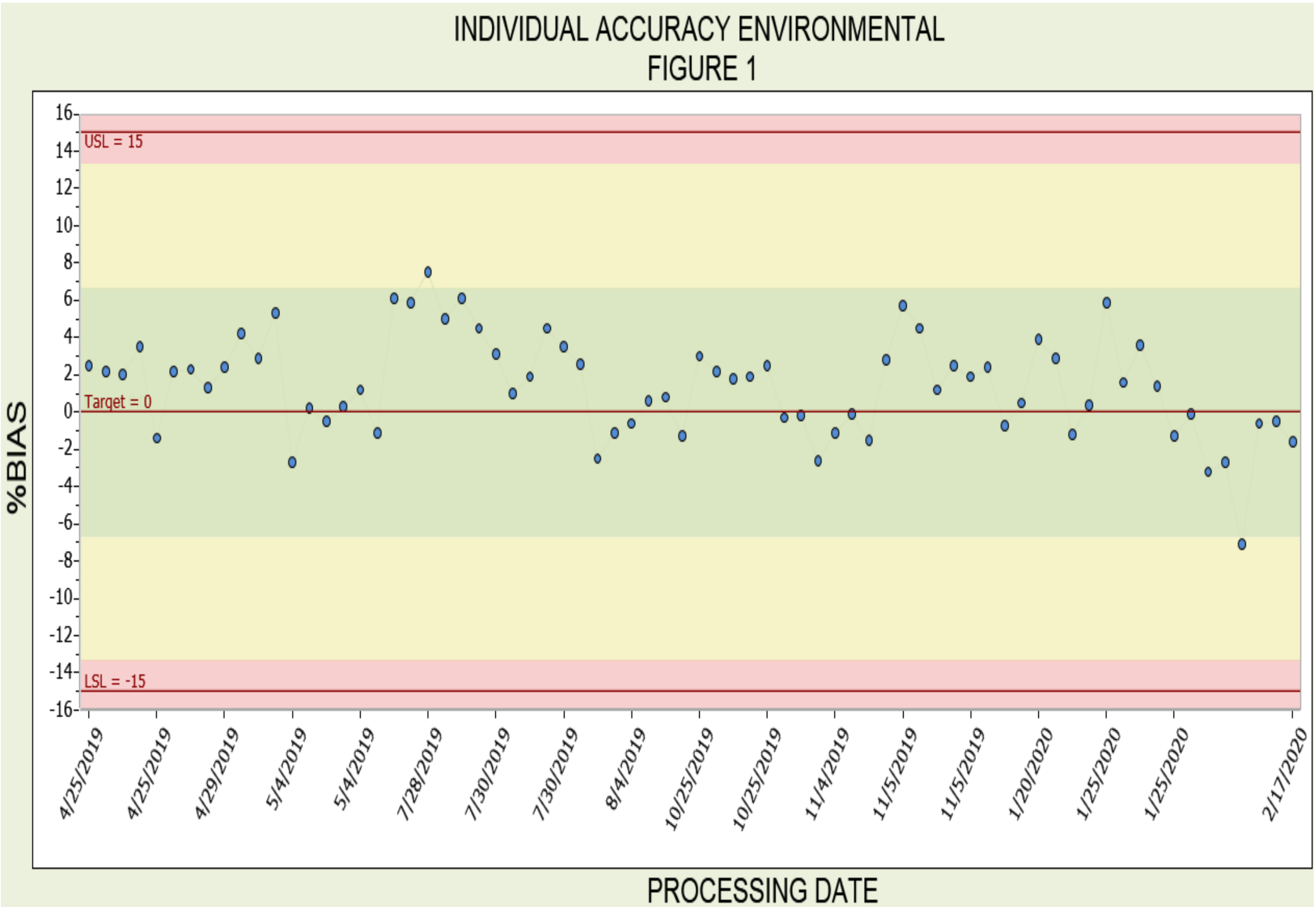
Issuance Period	Client	Mean Bias %	Standard Deviation %	Pass / Fail
1st Qtr. 2019	Millstone	0.6	2.6	Pass
2nd Qtr.2019	Seabrook	7.8	2.0	Pass
3rd Qtr. 2019	SONGS	0.1	2.4	Pass
3rd Qtr. 2019	Millstone	1.1	1.9	Pass
4th Qtr.2019	PSEG(PNNL)	-3.2	0.9	Pass
4th Qtr.2019	Seabrook	0.9	1.0	Pass

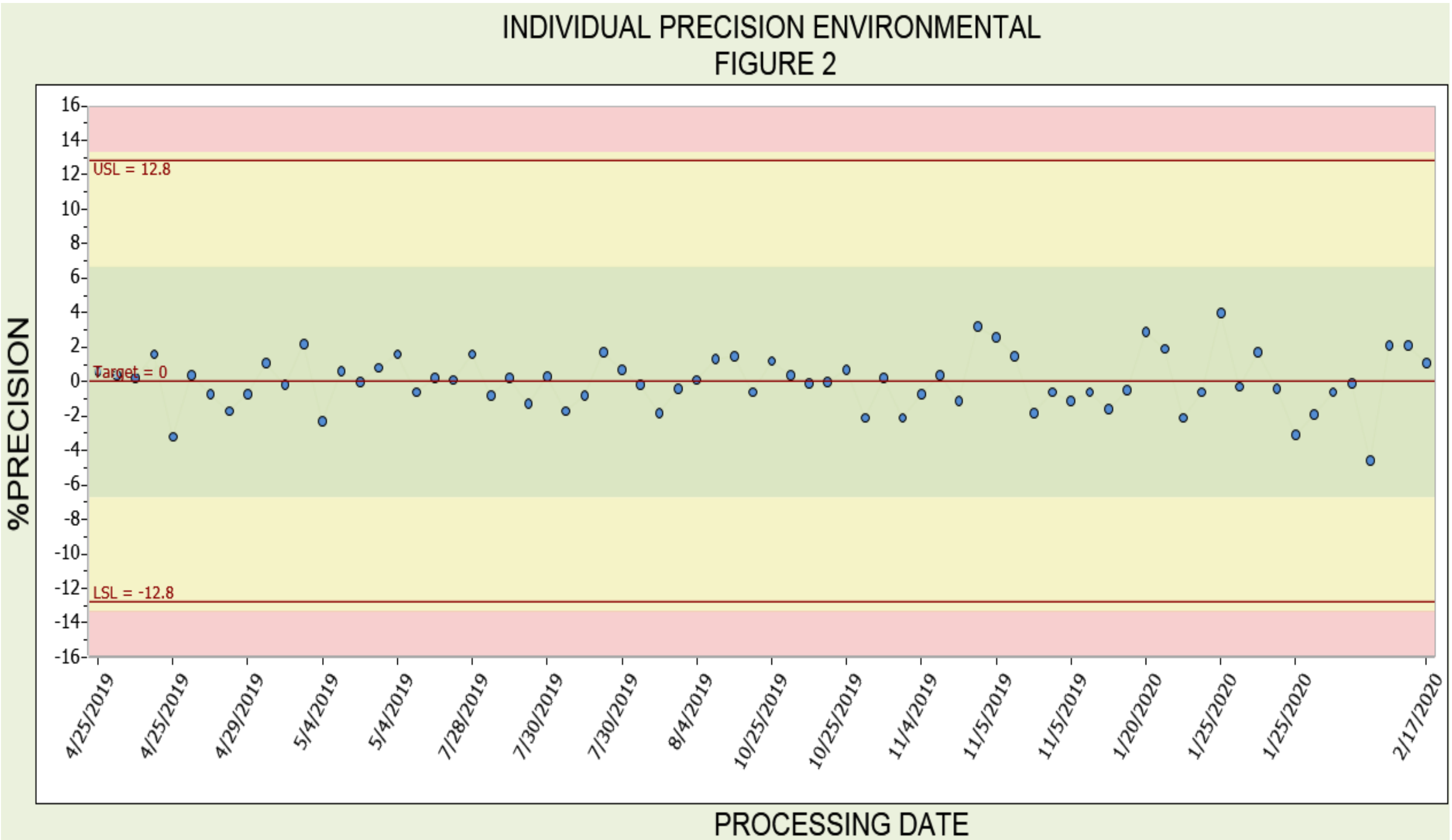
[(1)]Performance criteria are +/- 15%.
[(2)]Blind spikeirradiations using Cs-137

APPENDIX A

DOSIMETRY QUALITY CONTROL TRENDING GRAPHS

ISSUE PERIOD JANAURY - DECEMBER 2019


INDIVIDUAL ACCURACY ENVIRONMENTAL
FIGURE 1
%BIAS
USL = 15
Target = 0
LSL = -15
16
14
12
10
8
6
4
2
0
-2
-4
-6
-8
-10
-12
-14
-16
4/25/2019
4/25/2019
4/29/2019
5/4/2019
5/4/2019
7/28/2019
7/30/2019
7/30/2019
8/4/2019
10/25/2019
10/25/2019
11/4/2019
11/5/2019
11/5/2019
1/20/2020
1/25/2020
1/25/2020
2/17/2020
PROCESSING DATE


INDIVIDUAL PRECISION ENVIRONMENTAL
FIGURE 2
%PRECISION
USL = 12.8
Target = 0
LSL = -12.8
16
14
12
10
8
6
4
2
0
-2
-4
-6
-8
-10
-12
-14
-16
4/25/2019
4/25/2019
4/29/2019
5/4/2019
5/4/2019
7/28/2019
7/30/2019
7/30/2019
8/4/2019
10/25/2019
10/25/2019
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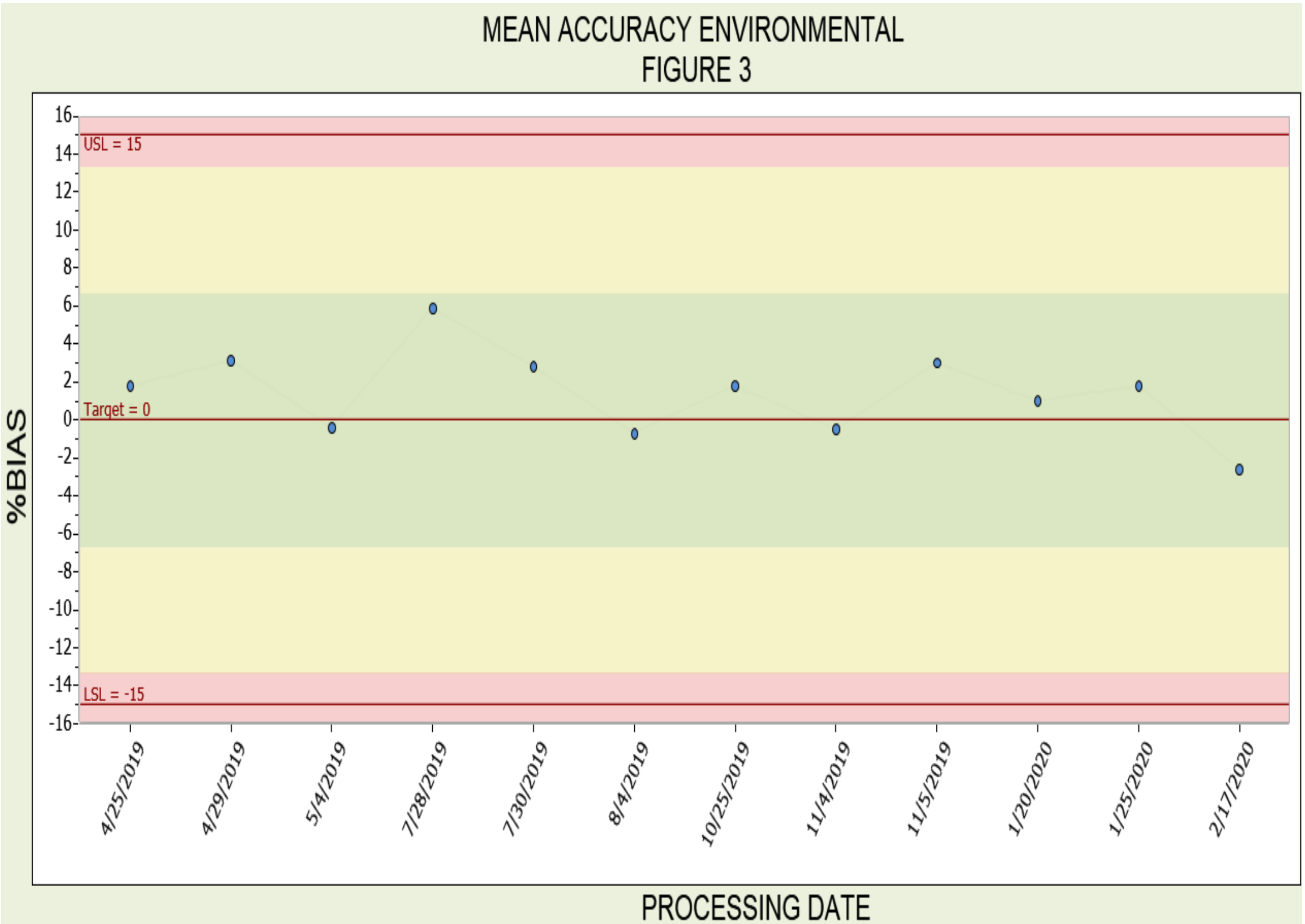
11/5/2019
1/20/2020
1/25/2020
1/25/2020
2/17/2020
PROCESSING DATE


MEAN ACCURACY ENVIRONMENTAL
FIGURE 3
%BIAS
USL = 15
Target = 0
LSL = -15
16
14
12
10
8
6
4
2
0
-2
-4
-6
-8
-10
-12
-14
-16
4/25/2019
4/29/2019
5/4/2019
7/28/2019
7/30/2019
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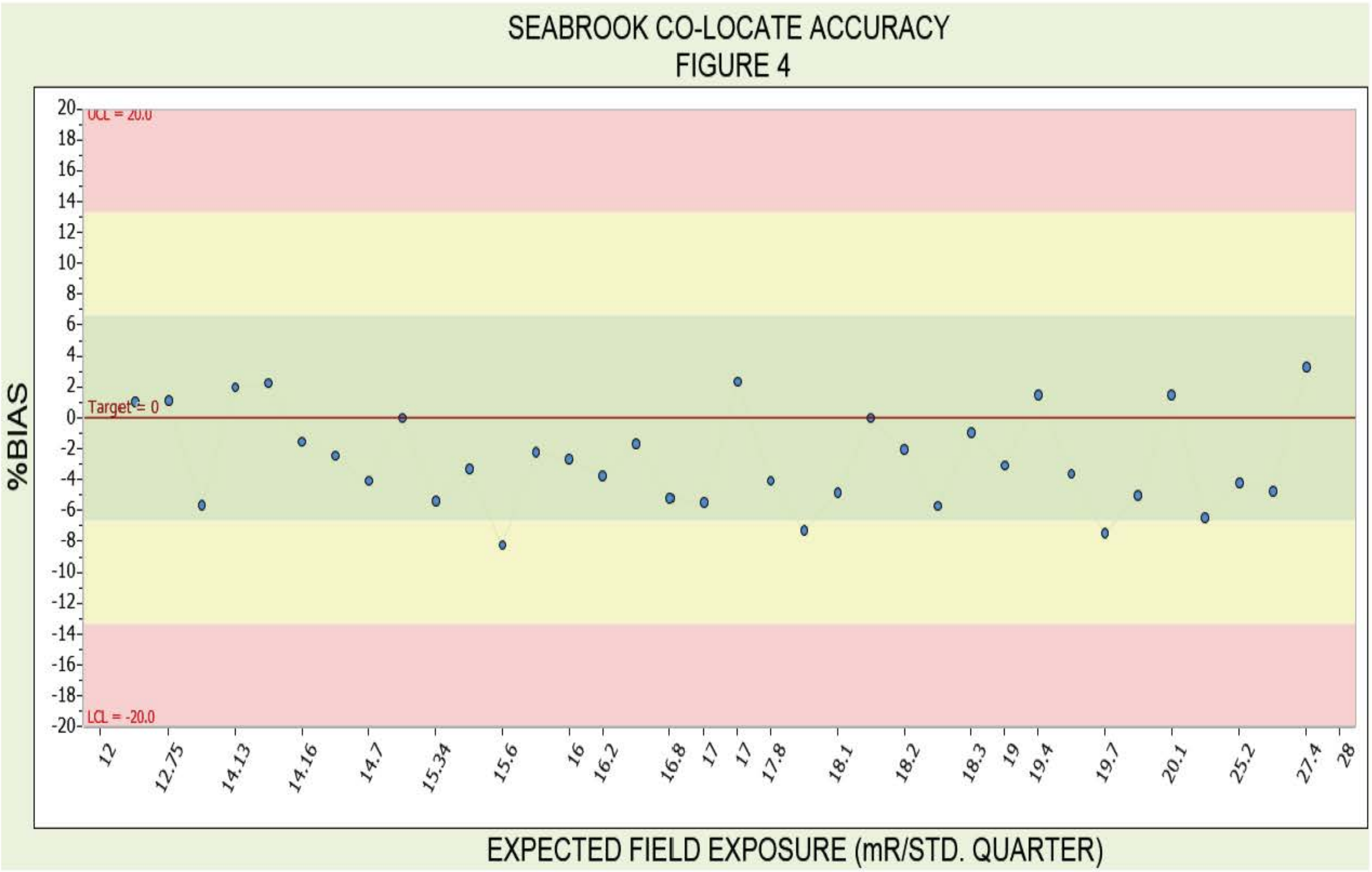
10/25/2019
11/4/2019
11/5/2019
1/20/2020
1/25/2020
2/17/2020
PROCESSING DATE


SEABROOK CO-LOCATE ACCURACY
FIGURE 4
UCL = 20.0
Target = 0
LCL = -20.0
%BIAS
12
12.75
14.13
14.16
14.7
15.34
15.6
16
16.2
16.8
17
17
17.8
18.1
18.2
18.3
19
19.4
19.7
20.1
25.2
27.4
28
EXPECTED FIELD EXPOSURE (mR/STD. QUARTER)

APPENDIX F

Teledyne Brown Engineering Environmental Services
Annual 2019 Quality Assurance Report

Summary of Results – Inter-laboratory Comparison Program (ICP)

The TBE Laboratory analyzed Performance Evaluation (PE) samples of air particulate, air iodine, milk, soil, vegetation, and water matrices for various analytes. The PE samples supplied by Analytics Inc., Environmental Resource Associates (ERA) and Department of Energy (DOE) Mixed Analyte Performance Evaluation Program (MAPEP), were evaluated against the following pre-set acceptance criteria:

A. Analytics Evaluation Criteria

Analytics' evaluation report provides a ratio of TBE's result and Analytics' known value. Since flag values are not assigned by Analytics, TBE evaluates the reported ratios based on internal QC requirements based on the DOE MAPEP criteria.

B. ERA Evaluation Criteria

ERA's evaluation report provides an acceptance range for control and warning limits with associated flag values. ERA's acceptance limits are established per the US EPA, National Environmental Laboratory Accreditation Conference (NELAC), state-specific Performance Testing (PT) program requirements or ERA's SOP for the Generation of Performance Acceptance Limits, as applicable. The acceptance limits are either determined by a regression equation specific to each analyte or a fixed percentage limit promulgated under the appropriate regulatory document.

C. DOE Evaluation Criteria

MAPEP's evaluation report provides an acceptance range with associated flag values. MAPEP defines three levels of performance:

- Acceptable (flag = "A") - result within ± 20% of the reference value
- Acceptable with Warning (flag = "W") - result falls in the ± 20% to ± 30% of the reference value
- Not Acceptable (flag = "N") - bias is greater than 30% of the reference value

Note: The Department of Energy (DOE) Mixed Analyte Performance Evaluation Program (MAPEP) samples are created to mimic conditions found at DOE sites which do not resemble typical environmental samples obtained at commercial nuclear power facilities.

For the TBE laboratory, 119 out of 129 analyses performed met the specified acceptance criteria. Ten analyses did not meet the specified acceptance criteria for the following reasons and were addressed through the TBE Corrective Action Program. A summary is found below:

1. The ERA April 2019 water Cs-134 result was evaluated as *Not Acceptable*. The reported value was 15.2 pCi/L (error 2.82 pCi/L) and the known result was 12.1 pCi/L (acceptance range of 8.39 - 14.4 pCi/L). With the error, the reported result overlaps the acceptable range. This sample was run as the workgroup duplicate on a different detector with a result of 10.7 pCi/L (within acceptable range). (NCR 19-10)

2. The ERA April 2019 water Sr-89 result was evaluated as *Not Acceptable*. The reported value was 44.9 pCi/L and the known result was 33.3 pCi/L (acceptance range of 24.5 - 40.1 pCi/L). The sample was only counted for 15 minutes instead of 200 minutes. The sample was re-prepped in duplicate and counted for 200 minutes with results of 30.7 ± 5.37 pCi/L and 33.0 ± 8.71 pCi/L. This was the 1st “high” failure for Sr-89 in 5 years. (NCR 19-11)

3. The MAPEP February 2019 soil Sr-90 result was not submitted and therefore evaluated as *Not Acceptable*. The sample was run in duplicate, with results of -1.32 ± 4.09 Bq/kg (<6.87) and -1.030 ± 3.55 Bq/kg (<5.97). The known result was a false positive test (no significant activity). TBE did not submit a result because it appeared that the results may not be accurate. TBE analyzed a substitute soil Sr-90 sample from another vendor, with a result within the acceptable range. (NCR 19-12)

4. The MAPEP February 2019 water Am-241 result was evaluated as *Not Acceptable*. The reported value was 0.764 ± 0.00725 Bq/L with a known result of 0.582 Bq/L (acceptable range 0.407 - 0.757 Bq/L). TBE’s result falls within the upper acceptable range with the error. It appeared that a non-radiological interference was added and lead to an increased mass and higher result. (NCR 19-13)

5. The MAPEP February 2019 vegetation Sr-90 result was evaluated as *Not Acceptable*. The reported result was -0.1060 ± 0.0328 Bq/kg and the known result was a false positive test (no significant activity). TBE’s result was correct in that there was no activity. MAPEP’s evaluation was a “statistical failure” at 3 standard deviations. (NCR 19-14)

6. The ERA October 2019 water Gross Alpha result was evaluated as *Not Acceptable*. TBE’s reported result was 40.5 ± 10.3 pCi/L and the known result was 27.6 pCi/L (ratio of TBE to known result at 135%). With the associated error, the result falls within the acceptable range (14.0 - 36.3 pCi/L). The sample was run as the workgroup duplicate on a different detector with a result of 30.8 ± 9.17 pCi/L (within the acceptable range). This was the first failure for drinking water Gr-A since 2012. (NCR 19-23)

7. The ERA October 2019 water Sr-90 result was evaluated as *Not Acceptable*. TBE’s reported result was 32.5 ± 2.12 pCi/L and the known result was 26.5 pCi/L (ratio of TBE to known result at 123%). With the

associated error, the result falls within the acceptable range (19.2 - 30.9 pCi/L). The sample was run as the workgroup duplicate on a different detector with a result of 20.0 ± 1.91 pCi/L (within the acceptable range). Both TBE results are within internal QC limits. A substitute "quick response" sample was analyzed with an acceptable result of 20.1 pCi/L (known range of 13.2 - 22.1 pCi/L). (NCR 19-24)

8. The MAPEP August 2019 soil Ni-63 result of 436 ± 22.8 Bq/kg was evaluated as Not Acceptable. The known result was 629 Bq/kg (acceptable range 440 - 818 Bq/kg). With the associated error, the TBE result falls within the lower acceptance range. All associated QC was acceptable. No reason for failure could be found. This is the first failure for soil Ni-63 since 2012. (NCR 19-25).

9. The MAPEP August 2019 water Am-241 result was not reported and therefore evaluated as *Not Acceptable*. Initial review of the results showed a large peak where Am-241 should be (same as the February, 2019 sample results). It is believed that Th-228 was intentionally added as an interference. The sample was re-prepped and analyzed using a smaller sample aliquot. The unusual large peak (Th-228) was seen again and also this time a smaller peak (Am-241). The result was 436 ± 22.8 Bq/L (acceptable range 0.365 ± 0.679 Bq/L). Th-228 is not a typical nuclide requested by clients, so there is no analytical purpose to take samples through an additional separation step. TBE will pursue using another vendor for Am-241 water cross-checks that more closely reflects actual customer samples. (NCR 19-26)

10. The Analytics September 2019 soil Cr-51 sample was evaluated as *Not Acceptable*. TBE's reported result of 0.765 ± 0.135 pCi/g exceeded the upper acceptance range (140% of the known result of 0.547 pCi/g). The TBE result was within the acceptable range (0.63 - 0.90 pCi/g) with the associated error. The Cr-51 result is very close to TBE's normal detection limit. In order to get a reportable result, the sample must be counted for 15 hours (10x longer than client samples). There is no client or regulatory requirement for this nuclide and TBE will remove Cr-51 from the reported gamma nuclides going forward. (NCR 19-27)

The Inter-Laboratory Comparison Program provides evidence of "in control" counting systems and methods, and that the laboratories are producing accurate and reliable data.

A.1 Analytics Environmental Radioactivity Cross Check Program
Teledyne Brown Engineering Environmental Services

Month/Year	Identification Number	Matrix	Nuclide	Units	TBE Reported Value	Known Value [(a)]	Ratio of TBE to Analytics Result	Evaluation [(b)]
March 2019	E12468A	Milk	Sr-89	pCi/L	87.1	96	0.91	A
			Sr-90	pCi/L	12.6	12.6	1.00	A
	E12469A	Milk	Ce-141	pCi/L	113	117	0.97	A
			Co-58	pCi/L	153	143	1.07	A
			Co-60	pCi/L	289	299	0.97	A
			Cr-51	pCi/L	233	293	0.80	A
			Cs-134	pCi/L	147	160	0.92	A
			Cs-137	pCi/L	193	196	0.98	A
			Fe-59	pCi/L	153	159	0.96	A
			I-131	pCi/L	91.5	89.5	1.02	A
			Mn-54	pCi/L	149	143	1.04	A
			Zn-65	pCi/L	209	220	0.95	A
	E12470	Charcoal	I-131	pCi	77.5	75.2	1.03	A
	E12471	AP	Ce-141	pCi	60.7	70.2	0.87	A
			Co-58	pCi	87.9	85.8	1.02	A
			Co-60	pCi	175	179	0.98	A
			Cr-51	pCi	165	176	0.94	A
			Cs-134	pCi	91.2	95.9	0.95	A
			Cs-137	pCi	120	118	1.02	A
			Fe-59	pCi	108	95.3	1.13	A
			Mn-54	pCi	94.2	85.7	1.10	A
			Zn-65	pCi	102	132	0.77	W
	E12472	Water	Fe-55	pCi/L	2230	1920	1.16	A
	E12473	Soil	Ce-141	pCi/g	0.189	0.183	1.03	A
			Co-58	pCi/g	0.209	0.224	0.93	A
			Co-60	pCi/g	0.481	0.466	1.03	A
			Cr-51	pCi/g	0.522	0.457	1.14	A
			Cs-134	pCi/g	0.218	0.250	0.87	A
			Cs-137	pCi/g	0.370	0.381	0.97	A
			Fe-59	pCi/g	0.263	0.248	1.06	A
			Mn-54	pCi/g	0.248	0.223	1.11	A
			Zn-65	pCi/g	0.371	0.344	1.08	A
	E12474	AP	Sr-89	pCi	88.3	95.2	0.93	A
			Sr-90	pCi	11.7	12.5	0.94	A
August 2019	E12562	Soil	Sr-90	pCi/g	4.710	6.710	0.70	W

(a) The Analytics known value is equal to 100% of the parameter present in the standard as determined by gravimetric and/or volumetric measurements made during standard preparation

(b) Analytics evaluation based on TBE internal QC limits:

A = Acceptable - reported result falls within ratio limits of 0.80-1.20

W = Acceptable with warning - reported result falls within 0.70-0.80 or 1.20-1.30

N = Not Acceptable - reported result falls outside the ratio limits of < 0.70 and > 1.30

A.1 Analytics Environmental Radioactivity Cross Check Program
Teledyne Brown Engineering Environmental Services

Month/Year	Identification Number	Matrix	Nuclide	Units	TBE Reported Value	Known Value [(a)]	Ratio of TBE to Analytics Result	Evaluation [(b)]
September 2019	E12475	Milk	Sr-89	pCi/L	70.0	93.9	0.75	W
			Sr-90	pCi/L	12.0	12.9	0.93	A
	E12476	Milk	Ce-141	pCi/L	150	167	0.90	A
			Co-58	pCi/L	170	175	0.97	A
			Co-60	pCi/L	211	211	1.00	A
			Cr-51	pCi/L	323	331	0.98	A
			Cs-134	pCi/L	180	207	0.87	A
			Cs-137	pCi/L	147	151	0.97	A
			Fe-59	pCi/L	156	148	1.05	A
			I-131	pCi/L	81.1	92.1	0.88	A
			Mn-54	pCi/L	160	154	1.04	A
			Zn-65	pCi/L	303	293	1.03	A
	E12477	Charcoal	I-131	pCi	95.9	95.1	1.01	A
	E12478	AP	Ce-141	pCi	129	138	0.93	A
			Co-58	pCi	128	145	0.88	A
			Co-60	pCi	181	174	1.04	A
			Cr-51	pCi	292	274	1.07	A
			Cs-134	pCi	166	171	0.97	A
			Cs-137	pCi	115	125	0.92	A
			Fe-59	pCi	119	123	0.97	A
			Mn-54	pCi	129	128	1.01	A
			Zn-65	pCi	230	242	0.95	A
	E12479	Water	Fe-55	pCi/L	1810	1850	0.98	A
	E12480	Soil	Ce-141	pCi/g	0.305	0.276	1.10	A
			Co-58	pCi/g	0.270	0.289	0.93	A
			Co-60	pCi/g	0.358	0.348	1.03	A
			Cr-51	pCi/g	0.765	0.547	1.40	N[(1)]
			Cs-134	pCi/g	0.327	0.343	0.95	A
			Cs-137	pCi/g	0.308	0.321	0.96	A
			Fe-59	pCi/g	0.257	0.245	1.05	A
			Mn-54	pCi/g	0.274	0.255	1.07	A
			Zn-65	pCi/g	0.536	0.485	1.11	A
	E12481	AP	Sr-89	pCi	95.9	91.9	1.04	A
			Sr-90	pCi	12.3	12.6	0.97	A
	E12563	Soil	Sr-90	pCi/g	0.392	0.360	1.09	A

(a) The Analytics known value is equal to 100% of the parameter present in the standard as determined by gravimetric and/or volumetric measurements made during standard preparation

(b) Analytics evaluation based on TBE internal QC limits:
A = Acceptable - reported result falls within ratio limits of 0.80-1.20
W = Acceptable with warning - reported result falls within 0.70-0.80 or 1.20-1.30
N = Not Acceptable - reported result falls outside the ratio limits of < 0.70 and > 1.30

*(1) See **NCR 19-27***

A.2 DOE's Mixed Analyte Performance Evaluation Program (MAPEP)
Teledyne Brown Engineering Environmental Services

Month/Year	Identification Number	Matrix	Nuclide	Units	TBE Reported Value	Known Value [(a)]	Acceptance Range	Evaluation [(b)]
February 2019	19-GrF40	AP	Gross Alpha	Bq/sample	0.184	0.528	0.158 - 0.898	A
			Gross Beta	Bq/sample	0.785	0.948	0.474 - 1.422	A
	19-MaS40	Soil	Ni-63	Bq/kg	420	519.0	363 - 675	A
			Sr-90	Bq/kg			*(1)*	NR[(3)]
	19-MaW40	Water	Am-241	Bq/L	0.764	0.582	0.407 - 0.757	N[(4)]
			Ni-63	Bq/L	4.72	5.8	4.1 - 7.5	A
			Pu-238	Bq/L	0.443	0.451	0.316 - 0.586	A
			Pu-239/240	Bq/L	-0.00161	0.0045	*(2)*	A
	19-RdF40	AP	U-234/233	Bq/sample	0.1138	0.106	0.074 - 0.138	A
			U-238	Bq/sample	0.107	0.110	0.077 - 0.143	A
	19-RdV40	Vegetation	Cs-134	Bq/sample	2.14	2.44	1.71 - 3.17	A
			Cs-137	Bq/sample	2.22	2.30	1.61 - 2.99	A
			Co-57	Bq/sample	2.16	2.07	1.45 - 2.69	A
			Co-60	Bq/sample	0.02382		*(1)*	A
			Mn-54	Bq/sample	-0.03607		*(1)*	A
			Sr-90	Bq/sample	-0.1060		*(1)*	N[(5)]
			Zn-65	Bq/sample	1.35	1.71	1.20 - 2.22	W
August 2019	19-GrF41	AP	Gross Alpha	Bq/sample	0.192	0.528	0.158 - 0.898	W
			Gross Beta	Bq/sample	0.722	0.937	0.469 - 1.406	A
	19-MaS41	Soil	Ni-63	Bq/kg	436	629	440 - 818	N[(6)]
			Sr-90	Bq/kg	444	572	400 - 744	W
	19-MaW41	Water	Am-241	Bq/L				NR[(7)]
			Ni-63	Bq/L	7.28	9.7	6.8 - 12.6	W
			Pu-238	Bq/L	0.0207	0.0063	*(2)*	A
			Pu-239/240	Bq/L	0.741	0.727	0.509 - 0.945	A
	19-RdF41	AP	U-234/233	Bq/sample	0.0966	0.093	0.065 - 0.121	A
			U-238	Bq/sample	0.0852	0.096	0.067-0.125	A
	19-RdV41	Vegetation	Cs-134	Bq/sample	0.0197		*(1)*	A
			Cs-137	Bq/sample	3.21	3.28	2.30 - 4.26	A
			Co-57	Bq/sample	4.62	4.57	3.20 - 5.94	A
			Co-60	Bq/sample	4.88	5.30	3.71 - 6.89	A
			Mn-54	Bq/sample	4.54	4.49	3.14 - 5.84	A
			Sr-90	Bq/sample	0.889	1.00	0.70 - 1.30	A
			Zn-65	Bq/sample	2.78	2.85	2.00 - 3.71	A

(a) The MAPEP known value is equal to 100% of the parameter present in the standard as determined by gravimetric and/or volumetric measurements made during standard preparation

(b) DOE/MAPEP evaluation:
A = Acceptable - reported result falls within ratio limits of 0.80-1.20
W = Acceptable with warning - reported result falls within 0.70-0.80 or 1.20-1.30
N = Not Acceptable - reported result falls outside the ratio limits of < 0.70 and > 1.30

(1) False positive test
(2) Sensitivity evaluation
*(3) See **NCR 19-12***
*(4) See **NCR 19-13***
*(5) See **NCR 19-14***
*(6) See **NCR 19-25***
*(7) See **NCR 19-26***

A.3 ERA Environmental Radioactivity Cross Check Program
Teledyne Brown Engineering Environmental Services

Month/Year	Identification Number	Matrix	Nuclide	Units	TBE Reported Value	Known Value [(a)]	Acceptance Limits	Evaluation [(b)]
April 2019	Rad-117	Water	Ba-133	pCi/L	26.3	24.1	18.6 - 27.8	A
			Cs-134	pCi/L	15.2	12.1	8.39 - 14.4	N[(1)]
			Cs-137	pCi/L	33.6	33.1	28.8 - 39.4	A
			Co-60	pCi/L	11.9	11.5	8.67 - 15.5	A
			Zn-65	pCi/L	87.1	89.2	80.3 - 107	A
			GR-A	pCi/L	19	19.3	9.56 - 26.5	A
			GR-B	pCi/L	20.2	29.9	19.1 - 37.7	A
			U-Nat	pCi/L	55.5	55.9	45.6 - 61.5	A
			H-3	pCi/L	21500	21400	18700 - 23500	A
			Sr-89	pCi/L	44.9	33.3	24.5 - 40.1	N[(2)]
			Sr-90	pCi/L	24.5	26.3	19.0 - 30.7	A
			I-131	pCi/L	28.9	28.4	23.6 - 33.3	A
October 2019	Rad-119	Water	Ba-133	pCi/L	42.7	43.8	35.7 - 48.8	A
			Cs-134	pCi/L	53.5	55.9	45.2 - 61.5	A
			Cs-137	pCi/L	77.7	78.7	70.8 - 89.2	A
			Co-60	pCi/L	51.5	53.4	48.1 - 61.3	A
			Zn-65	pCi/L	36.6	34.0	28.5 - 43.1	A
			GR-A	pCi/L	40.5	27.6	14.0 - 36.3	N[(3)]
			GR-B	pCi/L	36.3	39.8	26.4 - 47.3	A
			U-Nat	pCi/L	27.66	28.0	22.6 - 31.1	A
			H-3	pCi/L	22800	23400	20500 - 25700	A
			Sr-89	pCi/L	47.1	45.5	35.4 - 52.7	A
			Sr-90	pCi/L	32.5	26.5	19.2 - 30.9	N[(4)]
			I-131	pCi/L	26.0	23.9	19.8 - 28.4	A
December 2019	QR 120419D	Water	Sr-90	pCi/L	20.1	18.6	13.2 - 22.1	A

(a) The ERA known value is equal to 100% of the parameter present in the standard as determined by gravimetric and/or volumetric measurements made during standard preparation.
(b) ERA evaluation:
A = Acceptable - Reported value falls within the Acceptance Limits
N = Not Acceptable - Reported value falls outside of the Acceptance Limits
(1) See ***NCR 19-10***
(2) See ***NCR 19-11***
(3) See ***NCR 19-23***
(4) See ***NCR 19-24***