



February 29, 2024

L-2024-015
10 CFR 50.36a

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Re: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
2023 Annual Radioactive Effluent Release Report

Pursuant to 10 CFR 50.36a(a)(2), and Technical Specifications (TS) 6.9.1.7 and 6.14, this letter provides the 2023 Annual Radioactive Effluent Release Report (ARERR) and the Offsite Dose Calculation Manual (ODCM), Revision 55, for St. Lucie Units 1 and 2. The reports provide information for the 12-month period beginning January 1, 2023 and ending December 31, 2023.

If you have any questions regarding this submittal, please contact Kenneth Mack at 561-904-3635.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Catron', is written over a horizontal line.

Steve Catron
Licensing and Regulatory Compliance Director - Nuclear Fleet
Florida Power & Light Company

Enclosure 1: Annual Radioactive Effluent Release Report (ARERR)
Enclosure 2: Offsite Dose Calculation Manual (ODCM), Revision 55

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, St. Lucie Nuclear Plant
USNRC Resident Inspector, St. Lucie Nuclear Plant

ENCLOSURE 1

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT (ARERR)

(61 pages follow)

**FLORIDA POWER & LIGHT COMPANY
ST. LUCIE UNITS 1 AND 2
ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT
JANUARY 1, 2023 THROUGH DECEMBER 31, 2023**

1.0 PROGRAM DESCRIPTION

2.0 SUPPLEMENTAL INFORMATION

- 2.1 Abnormal Releases or Abnormal Discharges
- 2.2 Non-Routine Planned Discharges
- 2.3 Radioactive Waste Treatment System Changes
- 2.4 Annual Land Use Census Changes
- 2.5 Effluent Monitoring System Inoperability
- 2.6 Offsite Dose Calculation Manual Changes
- 2.7 Process Control Program Changes
- 2.8 Corrections to Previous Reports
- 2.9 Other
- 2.10 Groundwater Protection Program

3.0 TABLES

- 3.1 Gaseous Effluents and Liquid Effluents
- 3.2 Solid Waste Storage and Shipments
- 3.3 Dose Assessments
- 3.4 Visitor Dose

1.0 PROGRAM DESCRIPTION

Regulatory Limits

The Offsite Dose Calculation Manual (ODCM) Radiological Effluent Control limits applicable to the release of radioactive material in liquid and gaseous effluents are described in the following sections.

Fission and Activation Gases (Noble Gases)

The dose rate due to radioactive materials released in gaseous effluents, from the Site to areas at and beyond the Site boundary, shall be limited to less than or equal to 500 mrem/yr to the whole body and less than or equal to 3000 mrem/yr to the skin.

The air dose due to noble gases released in gaseous effluents from each Unit to areas at and beyond the Site boundary, shall be limited to:

- a. During any calendar quarter: Less than or equal to 5 mrad for gamma radiation and less than or equal to 10 mrad for beta radiation, and
- b. During any calendar year: Less than or equal to 10 mrad for gamma radiation and less than or equal to 20 mrad for beta radiation.

Iodine-131, Iodine-133, Tritium, Carbon-14, and Radioactive Material in Particulate Form

The dose rate due to Iodine-131 (I-131), Iodine-133 (I-133), Tritium, and all radionuclides in particulate form with half-lives greater than 8 days, released in gaseous effluents from the Site to areas at and beyond the Site boundary, shall be limited to less than or equal to 1500 mrem/yr to any organ.

The dose to a MEMBER OF THE PUBLIC from I-131, I-133, Tritium, Carbon-14 (C-14), and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each Unit to areas at and beyond the Site boundary, shall be limited to:

- a. During any calendar quarter: Less than or equal to 7.5 mrem to any organ, and
- b. During any calendar year: Less than or equal to 15 mrem to any organ.

Liquid Effluents

The concentration of radioactive material released in liquid effluents to unrestricted areas shall be limited to 10 times the concentrations specified in 10 CFR Part 20, Appendix B, Table 2, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to $2.0\text{E-}4$ $\mu\text{Ci/ml}$ total activity. The dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each Unit to unrestricted areas, shall be limited to:

- a. During any calendar quarter: Less than or equal to 1.5 mrem to the whole body and less than or equal to 5 mrem to any organ, and
- b. During any calendar year: Less than or equal to 3 mRem to the whole body and less than or equal to 10 mrem to any organ.

Total Dose

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

Effluent Concentration Limits

Gaseous Effluents

For gaseous effluents, effluent concentration limits (ECL) values are not directly used in release rate calculations since the applicable limits are expressed in terms of dose rate at the Site boundary.

Liquid Effluents

The values specified in 10 CFR Part 20, Appendix B, Table 2, Column 2 are used as the ECL for liquid radioactive effluents released to unrestricted areas. A value of $2.0\text{E-}04$ $\mu\text{Ci/ml}$ is used as the ECL for dissolved and entrained noble gases in liquid effluents.

Measurements and Approximations of Total Radioactivity

Measurements of total radioactivity in liquid and gaseous radioactive effluents were accomplished in accordance with the sampling and analysis requirements of Tables 4.11-1 and 4.11-2, respectively, of the St. Lucie ODCM. Estimates of errors are in accordance with Methodology Section 4.0.4 of the ODCM.

The estimate of errors associated with values reported are below:

| <u>Error Topic</u> | <u>LIQUID</u> | | <u>GASEOUS</u> | |
|----------------------|---------------|--------------|----------------|--------------|
| | <u>Avg %</u> | <u>Max %</u> | <u>Avg %</u> | <u>Max %</u> |
| Release Point Mixing | 2 | 5 | NA | NA |
| Sampling | 1 | 5 | 2 | 5 |
| Sample Preparation | 1 | 5 | 1 | 5 |
| Sample Analysis | 3 | 10 | 3 | 10 |
| Release Volume | <u>2</u> | <u>5</u> | <u>4</u> | <u>15</u> |
| Total % | 9 | 30 | 10 | 35 |

(above values are examples only)

The predictability of error for radioactive releases can only be applied to nuclides that are predominant in sample spectrums. Nuclides that are near background relative to the predominant nuclides in a given sample could easily have errors greater than the maximums listed above.

Liquid Radioactive Effluents

Each batch release was sampled and analyzed for gamma emitting radionuclides using gamma spectroscopy prior to release. Composite samples were analyzed monthly for tritium and gross alpha radioactivity in the onsite laboratory using liquid scintillation and air ion chamber counting techniques, respectively. Composite samples were analyzed quarterly for Strontium-89 (Sr-89), Strontium-90 (Sr-90), Iron-55 (Fe-55), Nickel-63 (Ni-63), and Carbon-14 (C-14) by a contract laboratory. The results of the composite analyses from the previous month or quarter were used to estimate the quantities of these radionuclides in liquid effluents during the current month or quarter. The total radioactivity in liquid effluent releases was determined from the measured and estimated concentrations of each radionuclide present and the total volume of the effluent released during periods of discharge.

Gaseous Radioactive Effluents

Each gaseous batch was sampled and analyzed for radioactivity prior to release. For releases from gas decay tanks, noble gas grab samples were analyzed for gamma emitting radionuclides using gamma spectroscopy. For releases from the reactor containment buildings, samples were taken of noble gas and tritium grab samples and analyzed for gamma emitting radionuclides prior to each release. The results of the analyses and the total volume of effluent released were used to determine the total amount of radioactivity released in the batch mode.

For continuous effluent release pathways, noble gas and tritium grab samples were collected and analyzed weekly for gamma emitting radionuclides by gamma spectroscopy and liquid scintillation counting techniques, respectively. Continuous release pathways were continuously sampled using radioiodine absorbers and particulate filters. The radioiodine absorbers and particulate filters were analyzed weekly for gamma emitting radionuclides using gamma spectroscopy. Results of the noble gas and tritium grab samples, radioiodine absorber, and particulate filter analyses from the current week along with the average effluent flow rate for the previous week were used to determine the total amount of radioactivity released in the continuous mode. Particulate filters were analyzed weekly for gross alpha activity in the onsite laboratory using the air ion chamber counting technique. Quarterly composites of particulate filters were analyzed for Sr-89 and Sr-90 by a contract laboratory.

Meteorological Monitoring Program

In accordance with ODCM Administrative Control 3.11.2.6.b., a summary of hourly meteorological data collected during 2023 is retained onsite. This data is available for review by the NRC upon request. During 2023, the goal of 90% joint data recovery was met. Actual meteorological data

collected during the year was used for the offsite dose calculations in this report.

Carbon-14 Dose Estimation

The estimate of C-14 released from the St. Lucie Nuclear Plant was derived from the EPRI document, "Estimation of Carbon-14 in Nuclear Power Plant Gaseous Effluents", Report 1021106, issued December 2010.

The Site-specific source term values used in the St. Lucie calculations were taken from the PWR Section, Page 4-28 of the report, and employed the proxy generation rate values for a Combustion Engineering reactor. The actual 2024 operating data for the units was employed for the calculations to derive the total curies released for each unit.

The total amount of C-14 released in 2023 from Unit 1 was 11.45 Ci, and the total amount of C-14 released in 2023 from Unit 2 was 10.26 Ci.

The highest calculated dose exposure pathway from C-14 is "Bone Dose" to a "Child" from consumption of citrus produce. A "Child" consuming citrus from the grove located 5.0 miles in the West direction from the plant would have received a total combined "Bone Dose", including C-14 of $4.49 \text{ E-02 mrem/yr}$.

Assessment of radiation dose from radioactive effluents to a MEMBER OF THE PUBLIC due to activities inside the site boundary assumes the visitor to be a Lifeguard at Walton Rocks Beach Recreation Area, located 1 mile southeast of the plant. Dose to the visitor on site for calendar year 2023 was calculated to be 9.48E-05 mrem/yr Total Body dose. See Section 3.4, Dose Assessments, for more detail.

The radiation dose received from radioactive effluents to a MEMBER OF THE PUBLIC due to activities inside the site boundary is a fraction of the 1 mrem annual whole-body dose received by the average US citizen from natural occurring C-14, primarily generated through cosmogenesis in the terrestrial biosphere (Reference: National Council of Radiation Protection Report 45, Natural Background Radiation in the United States).

All C-14 dose calculations are based on Regulatory Guide 1.109 values.

2.0 SUPPLEMENTAL INFORMATION

2.1 Abnormal Releases or Abnormal Discharges

No abnormal (unplanned) releases or discharges from the site were made during the report period.

2.2 Non-Routine Planned Discharges

No non-routine planned releases or discharges were made from the site during the report period.

2.3 Radioactive Waste Treatment System Changes

No changes were made to the Radioactive Waste Treatment System during the report period.

2.4 Annual Land Use Census Changes

There were no changes to the Land Use Census during the report period.

2.5 Effluent Monitoring System Inoperability

Three effluent radiation monitors were out of service for greater than 30 days during the report period:

- 1) Unit 2 RM-26-90, Plant Vent Wide Range Gas Monitor (PV WRGM) was declared out of service on February 19, 2022, due to Loss of Communication and No Readings. An ODCM change was completed on March 2, 2022, to allow substitution of the Plant Vent (Particulate, Iodine, Gas) PIG rad monitors for the Low Range Plant Vent WRGM (2-AOP-26.01). Sampling was required if the 2A or 2B Plant Vent PIG monitors went into Alert. The PV WRGM was placed back in-service on September 22, 2023 upon completion of repairs under Work Order 40817300.
- 2) Unit 1 Channel 42, Waste Gas Rad Monitor has been out of service since August 16, 2023 due to low detector signal or voltage while performing a functional. Repairs are being tracked under Work Order 40946546. As per ODCM Table 3.3-13, Action 45, two independent samples and release rate calculation and discharge valve lineup verifications are required for release.
- 3) RM-45-1, Steam Generator Blowdown Treatment Facility (SGBTF) Vent Rad Monitor has been out of service since August 2021. The rad monitor has been non-functional due to the green operable light not illuminated and particulate filter high pressure. SGBTF ventilation has been secured due to HVS-10A/B gravity dampers frozen shut. As per the Offsite Dose Calculation Manual (ODCM), Table 3.3-13, no actions are required if SGBTF ventilation is secured.

2.6 Offsite Dose Calculation Manual Changes

One revision was made to the St. Lucie Site ODCM during the report period.

- ODCM Revision 55 was completed in October 2023 to incorporate Regulatory Guide 1.21 Revision 3 guidance that long-term annual average XOQ and DOQ values be reevaluated periodically to determine if new dispersion values are substantially nonconservative.

2.7 Process Control Program Changes

No changes were made to the Process Control Program during the report period.

2.8 Corrections to Previous Reports

The following corrections were made to the 2020, 2021, and 2022 St. Lucie Plant ARERR and AREOR Reports. All revised reports were submitted to the NRC.

ARERR Report Corrections:

2021 ARERR Report Corrections – Two errors were corrected on the 2021 ARERR Report: 1) Critical Receptor child bone dose at the 5 mile west citrus location was corrected due to a calculation error. 2) The Steam Generator Blowdown Treatment Facility Vent Radiation Monitor was added to Effluent Monitoring System Inoperability because the monitor was out of service for greater than 30 days during the report period.

2022 ARERR Report Corrections – Four errors were corrected on the 2022 ARERR Report: 1) Critical Receptor child bone dose at the 5 mile west citrus location was corrected due to a calculation error. 2) Visitor dose for the Lifeguard located 1 mile southeast of the plant was corrected due to a calculation and transposition error. 3) The Steam Generator Blowdown Treatment Facility Vent Radiation Monitor and Unit 2 Plant Vent Wide Range Gas Monitor were added to Effluent Monitoring System Inoperability because both radiation monitors were out of service for greater than 30 days during the report period. 4) The latest revision of the ODCM was not attached to the 2022 ARERR Report when it was submitted to the NRC in February 2023 as required by technical specifications. The latest ODCM revision was attached to the 2022 ARERR.

AREOR Report Corrections:

2020 AREOR Report Correction – One additional REMP Program Equipment Deviation was added for pump failure at Air Sampler H12.

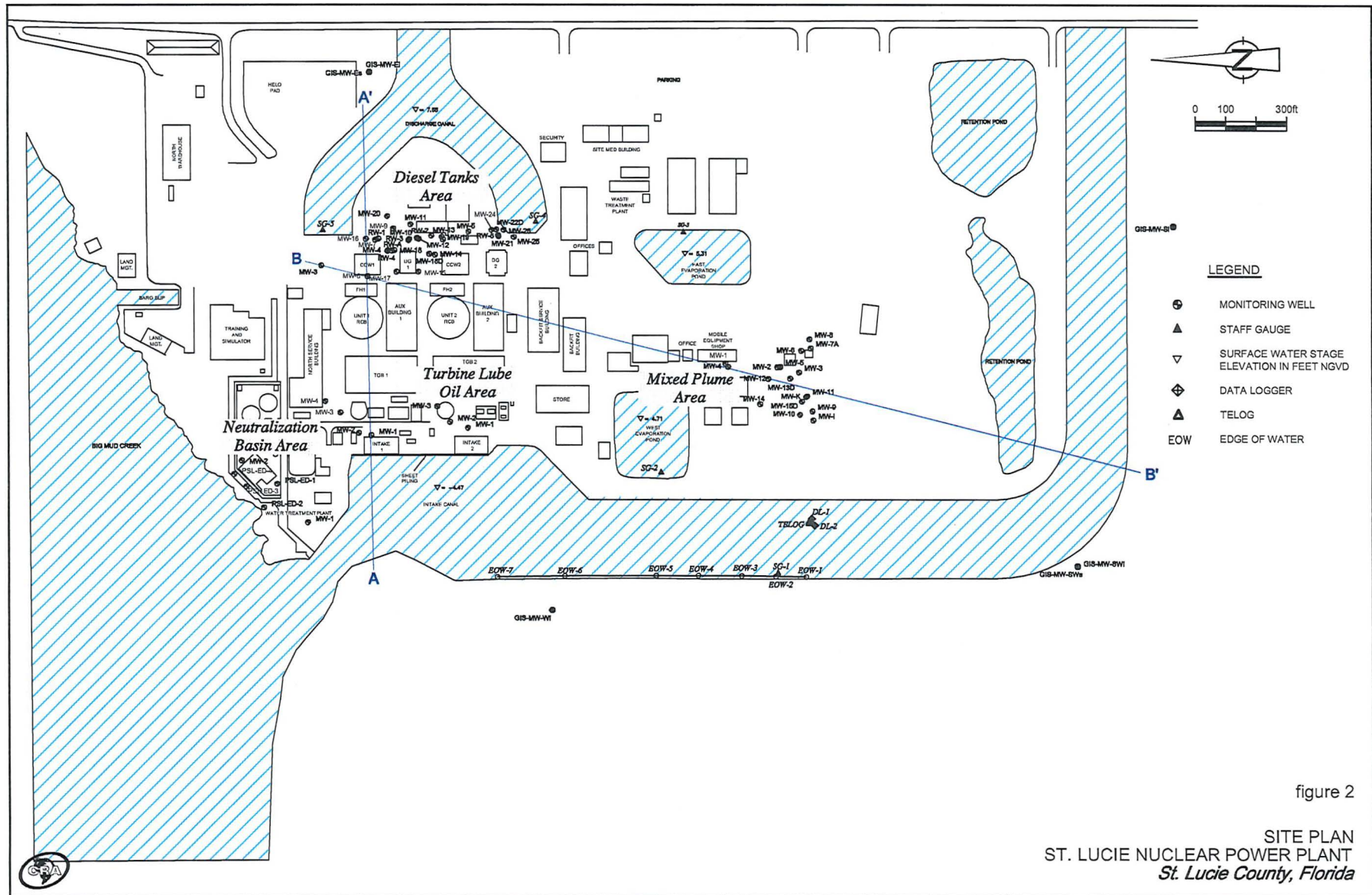
2022 AREOR Report Corrections – Several errors were corrected on the 2022 AREOR Report: 1) Corrected some Direct Radiation Exposure TLD results and added corrected trend chart. 2) Added the MAPEP 46 REMP Semi-Annual Interlaboratory Crosscheck Report. 3) Four additional REMP Program Equipment Deviations were added for two lost TLDs and two missed semiannual shoreline sediment samples.

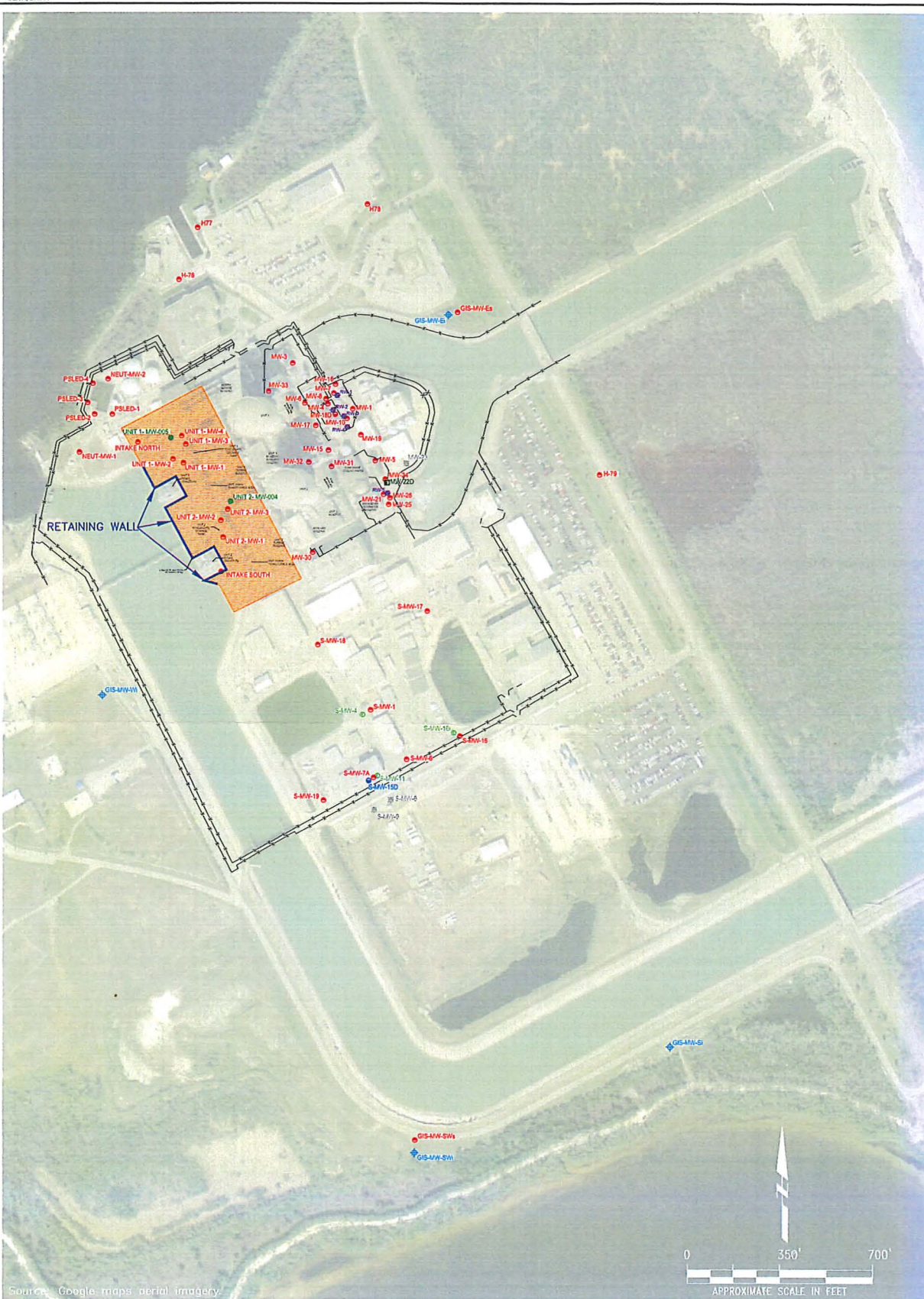
2.9 Other

South Pond Settling Basin Release Summary

Eleven batch releases were made from the South Settling Basin to the Intake Canal during the report period to lower the water level due to periods of higher than normal rainfall. All releases were analyzed according to the ODCM and Site procedural requirements and were found to have no detectable gamma, tritium, alpha, or hard-to-detect isotopes. The releases are summarized below:

| 2023 South Pond Releases | | | | |
|--------------------------|-------------|------------|---------------------|---------|
| # | Sample Date | | Volume (Gallons) | Quarter |
| 1 | 1/8/23 | L-23-003-B | 1,324,900 | Q1 |
| 2 | 4/22/23 | L-23-027-B | 5,353,503 | Q2 |
| 3 | 4/27/23 | L-23-028-B | 6,146,345 | |
| 4 | 5/25/23 | L-23-033-B | 2,054,568 | |
| 5 | 6/8/23 | L-23-037-B | 2,936,881 | |
| 6 | 6/22/23 | L-23-038-B | 3,925,844 | |
| 7 | 7/15/23 | L-23-047-B | 1,622,225 | Q3 |
| 8 | 9/22/23 | L-23-054-B | 9,039,840 | |
| 9 | 10/02/23 | L-23-056-B | 5,102,443 | Q4 |
| 10 | 11/17/22 | L-23-059-B | 3,281,691 | |
| 11 | 12/28/22 | L-23-070-B | 3,279,760 | |





Source: Google maps aerial imagery.

LEGEND:

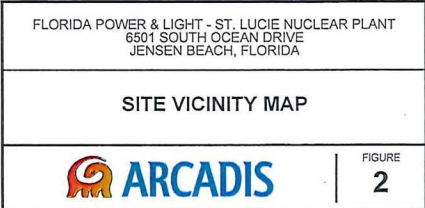
- SHALLOW WATER TABLE MONITORING WELL
- MONITORING WELL SCREENED 25 TO 30 FEET bgs
- MONITORING WELL SCREENED 30 TO 35 FEET bgs
- MONITORING WELL SCREENED 35 TO 40 FEET bgs
- MONITORING WELL SCREENED 40 TO 45 FEET bgs
- ABANDONED/DESTROYED MONITORING WELL
- ⊕ RECOVERY WELL SCREENED 10 TO 30 FEET bgs
- ⊕ MONITORING WELL SCREENED 42 TO 47 FEET bgs
- PROPOSED AREA OF RESTRICTED GROUNDWATER USE
- — — — — SECURITY FENCE

FLORIDA POWER & LIGHT - ST. LUCIE NUCLEAR PLANT
 6501 SOUTH OCEAN DRIVE
 JENSEN BEACH, FLORIDA

SITE LOCATION MAP



FIGURE
1



3.0 Tables

3.1 Gaseous Effluents and Liquid Effluents

Page 1 of 1
Wednesday, February 21, 2024 10:46:31AM
Florida Power & Light
St. Lucie Power Plant

Reg. Guide 1.21, Table 1A, Gaseous Effluents - Summation of All Releases

Unit: PSL1

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Total Release | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual | Uncertainty |
|----------------------------------------|-------|-------------|-------------|-------------|-------------|----------|-------------|
| A. Fission and Activation Gases | | | | | | | |
| 1. Total Release | Ci | 2.21E-01 | 1.29E+00 | 2.08E-01 | 2.17E-01 | 1.94E+00 | |
| 2. Average Release Rate for Period | uCi/s | 2.84E-02 | 1.65E-01 | 2.62E-02 | 2.73E-02 | 6.15E-02 | |
| 3. Percent of Limit | % | | | | | | |
| B. Iodines and Halogens | | | | | | | |
| 1. Total Release | Ci | 1.86E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.86E-07 | |
| 2. Average Release Rate for Period | uCi/s | 2.39E-08 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.90E-09 | |
| 3. Percent of Limit | % | | | | | | |
| C. Particulates | | | | | | | |
| 1. Total Release | Ci | 4.52E-07 | 0.00E+00 | 1.56E-04 | 1.97E-04 | 3.53E-04 | |
| 2. Average Release Rate for Period | uCi/s | 5.81E-08 | 0.00E+00 | 1.96E-05 | 2.48E-05 | 1.12E-05 | |
| 3. Percent of Limit | % | | | | | | |
| D. Tritium | | | | | | | |
| 1. Total Release | Ci | 1.53E+00 | 3.14E+00 | 2.46E-01 | 2.57E+01 | 3.06E+01 | |
| 2. Average Release Rate for Period | uCi/s | 1.96E-01 | 4.00E-01 | 3.09E-02 | 3.23E+00 | 9.70E-01 | |
| 3. Percent of Limit | % | | | | | | |
| E. Gross Alpha | | | | | | | |
| 1. Total Release | Ci | 2.89E-08 | 1.70E-08 | 1.98E-08 | 0.00E+00 | 6.57E-08 | |
| F. Carbon-14 | | | | | | | |
| 1. Total Release | Ci | 2.82E+00 | 2.85E+00 | 2.86E+00 | 2.89E+00 | 1.14E+01 | |
| 2. Average Release Rate for Period | uCi/s | 3.63E-01 | 3.63E-01 | 3.60E-01 | 3.64E-01 | 3.63E-01 | |
| 3. Percent of Limit | % | | | | | | |

Reg. Guide 1.21, Table 1A, Gaseous Effluents - Summation of All Releases

Unit: PSL2

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Total Release | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual | Uncertainty |
|----------------------------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|--------------------|
| A. Fission and Activation Gases | | | | | | | |
| 1. Total Release | Ci | 5.29E+00 | 5.53E+00 | 5.72E-01 | 2.81E+00 | 1.42E+01 | |
| 2. Average Release Rate for Period | uCi/s | 6.80E-01 | 7.03E-01 | 7.20E-02 | 3.54E-01 | 4.50E-01 | |
| 3. Percent of Limit | % | | | | | | |
| B. Iodines and Halogens | | | | | | | |
| 1. Total Release | Ci | 4.73E-06 | 0.00E+00 | 0.00E+00 | 5.38E-06 | 1.01E-05 | |
| 2. Average Release Rate for Period | uCi/s | 6.08E-07 | 0.00E+00 | 0.00E+00 | 6.77E-07 | 3.21E-07 | |
| 3. Percent of Limit | % | | | | | | |
| C. Particulates | | | | | | | |
| 1. Total Release | Ci | 5.51E-06 | 1.36E-04 | 0.00E+00 | 6.90E-05 | 2.10E-04 | |
| 2. Average Release Rate for Period | uCi/s | 7.09E-07 | 1.73E-05 | 0.00E+00 | 8.68E-06 | 6.67E-06 | |
| 3. Percent of Limit | % | | | | | | |
| D. Tritium | | | | | | | |
| 1. Total Release | Ci | 4.83E-01 | 2.90E+00 | 3.35E+00 | 2.15E+01 | 2.82E+01 | |
| 2. Average Release Rate for Period | uCi/s | 6.21E-02 | 3.69E-01 | 4.22E-01 | 2.71E+00 | 8.96E-01 | |
| 3. Percent of Limit | % | | | | | | |
| E. Gross Alpha | | | | | | | |
| 1. Total Release | Ci | 6.05E-08 | 2.82E-08 | 1.33E-08 | 0.00E+00 | 1.02E-07 | |
| F. Carbon-14 | | | | | | | |
| 1. Total Release | Ci | 1.90E+00 | 2.88E+00 | 2.91E+00 | 2.58E+00 | 1.03E+01 | |
| 2. Average Release Rate for Period | uCi/s | 2.44E-01 | 3.66E-01 | 3.66E-01 | 3.25E-01 | 3.25E-01 | |
| 3. Percent of Limit | % | | | | | | |

Reg. Guide 1.21, Table 1A, Gaseous Effluents - Summation of All Releases

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Total Release | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual | Uncertainty |
|----------------------------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|--------------------|
| A. Fission and Activation Gases | | | | | | | |
| 1. Total Release | Ci | 5.51E+00 | 6.82E+00 | 7.80E-01 | 3.03E+00 | 1.61E+01 | |
| 2. Average Release Rate for Period | uCi/s | 7.09E-01 | 8.68E-01 | 9.82E-02 | 3.81E-01 | 5.12E-01 | |
| 3. Percent of Limit | % | | | | | | |
| B. Iodines and Halogens | | | | | | | |
| 1. Total Release | Ci | 4.91E-06 | 0.00E+00 | 0.00E+00 | 5.38E-06 | 1.03E-05 | |
| 2. Average Release Rate for Period | uCi/s | 6.32E-07 | 0.00E+00 | 0.00E+00 | 6.77E-07 | 3.27E-07 | |
| 3. Percent of Limit | % | | | | | | |
| C. Particulates | | | | | | | |
| 1. Total Release | Ci | 5.96E-06 | 1.36E-04 | 1.56E-04 | 2.66E-04 | 5.64E-04 | |
| 2. Average Release Rate for Period | uCi/s | 7.67E-07 | 1.73E-05 | 1.96E-05 | 3.35E-05 | 1.79E-05 | |
| 3. Percent of Limit | % | | | | | | |
| D. Tritium | | | | | | | |
| 1. Total Release | Ci | 2.01E+00 | 6.05E+00 | 3.60E+00 | 4.72E+01 | 5.88E+01 | |
| 2. Average Release Rate for Period | uCi/s | 2.59E-01 | 7.69E-01 | 4.52E-01 | 5.94E+00 | 1.87E+00 | |
| 3. Percent of Limit | % | | | | | | |
| E. Gross Alpha | | | | | | | |
| 1. Total Release | Ci | 8.94E-08 | 4.52E-08 | 3.31E-08 | 0.00E+00 | 1.68E-07 | |
| F. Carbon-14 | | | | | | | |
| 1. Total Release | Ci | 4.72E+00 | 5.73E+00 | 5.77E+00 | 5.47E+00 | 2.17E+01 | |
| 2. Average Release Rate for Period | uCi/s | 6.07E-01 | 7.29E-01 | 7.26E-01 | 6.88E-01 | 6.88E-01 | |
| 3. Percent of Limit | % | | | | | | |

Reg. Guide 1.21, Table 1B, Gaseous Effluents - Ground Level Release - Continuous Mode

Unit: PSL1

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Nuclides Released | Units | Continuous Mode | | | | |
|---------------------------------|-------|-----------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Gases | | | | | | |
| Xe-131m | Ci | 0.00E+00 | 1.09E+00 | 0.00E+00 | 0.00E+00 | 1.09E+00 |
| B. Iodines and Halogens | | | | | | |
| I-131 | Ci | 1.86E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.86E-07 |
| C. Particulates | | | | | | |
| Co-60 | Ci | 4.52E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 4.52E-07 |
| D. Tritium | | | | | | |
| H-3 | Ci | 1.43E+00 | 2.97E+00 | 0.00E+00 | 2.55E+01 | 2.99E+01 |
| E. Gross Alpha | | | | | | |
| G-Alpha | Ci | 2.89E-08 | 1.70E-08 | 1.98E-08 | 0.00E+00 | 6.57E-08 |
| F. Carbon-14 | | | | | | |
| C-14 | Ci | 2.82E+00 | 2.85E+00 | 2.86E+00 | 2.89E+00 | 1.14E+01 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

User: calvin crawford

[Server]: PSLSA137 [Database]: NEPSOEMP

Reg. Guide 1.21, Table 1B, Gaseous Effluents - Ground Level Release - Batch Mode**Unit: PSL1****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|---------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Gases | | | | | | |
| Ar-41 | Ci | 1.88E-01 | 1.73E-01 | 1.71E-01 | 1.84E-01 | 7.15E-01 |
| Kr-85m | Ci | 0.00E+00 | 0.00E+00 | 2.79E-05 | 0.00E+00 | 2.79E-05 |
| Xe-127 | Ci | 4.09E-05 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 4.09E-05 |
| Xe-135 | Ci | 3.39E-04 | 4.11E-04 | 4.92E-04 | 1.58E-04 | 1.40E-03 |
| Xe-133 | Ci | 3.24E-02 | 3.40E-02 | 3.69E-02 | 3.34E-02 | 1.37E-01 |
| Total For Period | Ci | 2.21E-01 | 2.07E-01 | 2.08E-01 | 2.17E-01 | 8.53E-01 |
| B. Iodines and Halogens | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| C. Particulates | | | | | | |
| Co-60 | Ci | 0.00E+00 | 0.00E+00 | 7.76E-05 | 0.00E+00 | 7.76E-05 |
| Ag-110m | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 4.14E-05 | 4.14E-05 |
| Cs-137 | Ci | 0.00E+00 | 0.00E+00 | 7.83E-05 | 1.56E-04 | 2.34E-04 |
| Total For Period | Ci | 0.00E+00 | 0.00E+00 | 1.56E-04 | 1.97E-04 | 3.53E-04 |
| D. Tritium | | | | | | |
| H-3 | Ci | 9.81E-02 | 1.75E-01 | 2.46E-01 | 1.77E-01 | 6.95E-01 |
| E. Gross Alpha | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| F. Carbon-14 | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 1B, Gaseous Effluents - Ground Level Release - Continuous Mode

Unit: PSL2

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Nuclides Released | Units | Continuous Mode | | | | |
|---------------------------------|-------|-----------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Gases | | | | | | |
| Kr-87 | Ci | 0.00E+00 | 1.77E-01 | 0.00E+00 | 0.00E+00 | 1.77E-01 |
| Xe-133 | Ci | 0.00E+00 | 0.00E+00 | 1.23E-01 | 0.00E+00 | 1.23E-01 |
| Xe-138 | Ci | 0.00E+00 | 5.01E+00 | 0.00E+00 | 0.00E+00 | 5.01E+00 |
| Total For Period | Ci | 0.00E+00 | 5.18E+00 | 1.23E-01 | 0.00E+00 | 5.31E+00 |
| B. Iodines and Halogens | | | | | | |
| I-131 | Ci | 4.48E-06 | 0.00E+00 | 0.00E+00 | 5.38E-06 | 9.86E-06 |
| C. Particulates | | | | | | |
| Co-60 | Ci | 2.43E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.43E-07 |
| Mo-99 | Ci | 0.00E+00 | 1.33E-05 | 0.00E+00 | 0.00E+00 | 1.33E-05 |
| Total For Period | Ci | 2.43E-07 | 1.33E-05 | 0.00E+00 | 0.00E+00 | 1.36E-05 |
| D. Tritium | | | | | | |
| H-3 | Ci | 0.00E+00 | 2.65E+00 | 2.62E+00 | 3.18E+00 | 8.45E+00 |
| E. Gross Alpha | | | | | | |
| G-Alpha | Ci | 5.79E-08 | 2.82E-08 | 1.33E-08 | 0.00E+00 | 9.94E-08 |
| F. Carbon-14 | | | | | | |
| C-14 | Ci | 1.90E+00 | 2.88E+00 | 2.91E+00 | 2.58E+00 | 1.03E+01 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 1B, Gaseous Effluents - Ground Level Release - Batch Mode**Unit: PSL2****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|---------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Gases | | | | | | |
| Ar-41 | Ci | 3.38E+00 | 2.76E-01 | 3.37E-01 | 7.95E-01 | 4.79E+00 |
| Kr-85m | Ci | 7.20E-04 | 5.68E-05 | 0.00E+00 | 5.43E-05 | 8.31E-04 |
| Kr-85 | Ci | 7.13E-03 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 7.13E-03 |
| Kr-87 | Ci | 0.00E+00 | 1.39E-04 | 1.12E-04 | 0.00E+00 | 2.51E-04 |
| Kr-88 | Ci | 3.55E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.55E-04 |
| Xe-135 | Ci | 1.08E-01 | 4.18E-03 | 8.39E-03 | 1.30E-01 | 2.50E-01 |
| Xe-133m | Ci | 2.60E-03 | 4.22E-04 | 0.00E+00 | 0.00E+00 | 3.02E-03 |
| Xe-133 | Ci | 1.79E+00 | 6.33E-02 | 1.04E-01 | 1.89E+00 | 3.84E+00 |
| Total For Period | Ci | 5.29E+00 | 3.44E-01 | 4.49E-01 | 2.81E+00 | 8.90E+00 |
| B. Iodines and Halogens | | | | | | |
| I-131 | Ci | 2.52E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.52E-07 |
| C. Particulates | | | | | | |
| Mn-54 | Ci | 0.00E+00 | 1.23E-04 | 0.00E+00 | 0.00E+00 | 1.23E-04 |
| Co-58 | Ci | 1.58E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.58E-07 |
| Co-60 | Ci | 1.22E-06 | 0.00E+00 | 0.00E+00 | 6.90E-05 | 7.02E-05 |
| Zr-95 | Ci | 7.83E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 7.83E-07 |
| Nb-95 | Ci | 1.46E-06 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.46E-06 |
| Te-129m | Ci | 1.57E-06 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.57E-06 |
| Te-132 | Ci | 8.71E-08 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.71E-08 |
| Total For Period | Ci | 5.27E-06 | 1.23E-04 | 0.00E+00 | 6.90E-05 | 1.97E-04 |
| D. Tritium | | | | | | |
| H-3 | Ci | 4.83E-01 | 2.51E-01 | 7.35E-01 | 1.83E+01 | 1.98E+01 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 1B, Gaseous Effluents - Ground Level Release - Batch Mode

Unit: PSL2

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Nuclides Released | Units | Batch Mode | | | | |
|-------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| E. Gross Alpha | | | | | | |
| G-Alpha | Ci | 2.59E-09 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.59E-09 |
| F. Carbon-14 | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 1B, Gaseous Effluents - Ground Level Release - Continuous Mode

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Nuclides Released | Units | Continuous Mode | | | | |
|---------------------------------|-------|-----------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Gases | | | | | | |
| Kr-87 | Ci | 0.00E+00 | 1.77E-01 | 0.00E+00 | 0.00E+00 | 1.77E-01 |
| Xe-131m | Ci | 0.00E+00 | 1.09E+00 | 0.00E+00 | 0.00E+00 | 1.09E+00 |
| Xe-133 | Ci | 0.00E+00 | 0.00E+00 | 1.23E-01 | 0.00E+00 | 1.23E-01 |
| Xe-138 | Ci | 0.00E+00 | 5.01E+00 | 0.00E+00 | 0.00E+00 | 5.01E+00 |
| Total For Period | Ci | 0.00E+00 | 6.27E+00 | 1.23E-01 | 0.00E+00 | 6.40E+00 |
| B. Iodines and Halogens | | | | | | |
| I-131 | Ci | 4.66E-06 | 0.00E+00 | 0.00E+00 | 5.38E-06 | 1.00E-05 |
| C. Particulates | | | | | | |
| Co-60 | Ci | 6.95E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 6.95E-07 |
| Mo-99 | Ci | 0.00E+00 | 1.33E-05 | 0.00E+00 | 0.00E+00 | 1.33E-05 |
| Total For Period | Ci | 6.95E-07 | 1.33E-05 | 0.00E+00 | 0.00E+00 | 1.40E-05 |
| D. Tritium | | | | | | |
| H-3 | Ci | 1.43E+00 | 5.62E+00 | 2.62E+00 | 2.87E+01 | 3.83E+01 |
| E. Gross Alpha | | | | | | |
| G-Alpha | Ci | 8.69E-08 | 4.52E-08 | 3.31E-08 | 0.00E+00 | 1.65E-07 |
| F. Carbon-14 | | | | | | |
| C-14 | Ci | 4.72E+00 | 5.73E+00 | 5.77E+00 | 5.47E+00 | 2.17E+01 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 1B, Gaseous Effluents - Ground Level Release - Batch Mode**Unit: Site****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|---------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Gases | | | | | | |
| Ar-41 | Ci | 3.57E+00 | 4.49E-01 | 5.07E-01 | 9.79E-01 | 5.51E+00 |
| Kr-85m | Ci | 7.20E-04 | 5.68E-05 | 2.79E-05 | 5.43E-05 | 8.59E-04 |
| Kr-85 | Ci | 7.13E-03 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 7.13E-03 |
| Kr-87 | Ci | 0.00E+00 | 1.39E-04 | 1.12E-04 | 0.00E+00 | 2.51E-04 |
| Kr-88 | Ci | 3.55E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.55E-04 |
| Xe-127 | Ci | 4.09E-05 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 4.09E-05 |
| Xe-135 | Ci | 1.08E-01 | 4.59E-03 | 8.88E-03 | 1.30E-01 | 2.52E-01 |
| Xe-133m | Ci | 2.60E-03 | 4.22E-04 | 0.00E+00 | 0.00E+00 | 3.02E-03 |
| Xe-133 | Ci | 1.82E+00 | 9.73E-02 | 1.41E-01 | 1.92E+00 | 3.98E+00 |
| Total For Period | Ci | 5.51E+00 | 5.51E-01 | 6.57E-01 | 3.03E+00 | 9.75E+00 |
| B. Iodines and Halogens | | | | | | |
| I-131 | Ci | 2.52E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.52E-07 |
| C. Particulates | | | | | | |
| Mn-54 | Ci | 0.00E+00 | 1.23E-04 | 0.00E+00 | 0.00E+00 | 1.23E-04 |
| Co-58 | Ci | 1.58E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.58E-07 |
| Co-60 | Ci | 1.22E-06 | 0.00E+00 | 7.76E-05 | 6.90E-05 | 1.48E-04 |
| Zr-95 | Ci | 7.83E-07 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 7.83E-07 |
| Nb-95 | Ci | 1.46E-06 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.46E-06 |
| Ag-110m | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 4.14E-05 | 4.14E-05 |
| Te-129m | Ci | 1.57E-06 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.57E-06 |
| Te-132 | Ci | 8.71E-08 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.71E-08 |
| Cs-137 | Ci | 0.00E+00 | 0.00E+00 | 7.83E-05 | 1.56E-04 | 2.34E-04 |
| Total For Period | Ci | 5.27E-06 | 1.23E-04 | 1.56E-04 | 2.66E-04 | 5.50E-04 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 1B, Gaseous Effluents - Ground Level Release - Batch Mode**Unit: Site****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|-------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| D. Tritium | | | | | | |
| H-3 | Ci | 5.81E-01 | 4.26E-01 | 9.80E-01 | 1.85E+01 | 2.05E+01 |
| E. Gross Alpha | | | | | | |
| G-Alpha | Ci | 2.59E-09 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.59E-09 |
| F. Carbon-14 | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 2A, Liquid Effluents - Summation of All Releases

Unit: PSL1

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Total Release | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual | Uncertainty |
|-------------------------------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|--------------------|
| A. Fission and Activation Products | | | | | | | |
| 1. Total Release | Ci | 1.78E-02 | 2.71E-03 | 1.86E-03 | 3.31E-02 | 5.54E-02 | |
| 2. Average Concentration | uCi/mL | 5.04E-10 | 2.90E-11 | 3.68E-11 | 5.39E-10 | 2.30E-10 | |
| 3. Percent of Limit | % | | | | | | |
| B. Tritium | | | | | | | |
| 1. Total Release | Ci | 1.07E+02 | 1.39E+01 | 2.98E+01 | 2.71E+02 | 4.22E+02 | |
| 2. Average Concentration | uCi/mL | 3.03E-06 | 1.49E-07 | 5.90E-07 | 4.43E-06 | 1.76E-06 | |
| 3. Percent of Limit | % | | | | | | |
| C. Dissolved and Entrained Gases | | | | | | | |
| 1. Total Release | Ci | 1.66E-02 | 1.10E-05 | 0.00E+00 | 9.97E-04 | 1.76E-02 | |
| 2. Average Concentration | uCi/mL | 4.70E-10 | 1.18E-13 | 0.00E+00 | 1.63E-11 | 7.31E-11 | |
| 3. Percent of Limit | % | | | | | | |
| D. Gross Alpha Activity | | | | | | | |
| 1. Total Release | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | |
| 2. Average Concentration | uCi/mL | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | |
| E. Primary Liquid Release Volume | | | | | | | |
| 1. Total Release | Liters | 3.61E+06 | 3.91E+07 | 2.07E+07 | 2.28E+07 | 8.62E+07 | |
| F. Dilution Volume | | | | | | | |
| 1. Total Release | Liters | 3.53E+10 | 9.34E+10 | 5.06E+10 | 6.13E+10 | 2.41E+11 | |

Reg. Guide 1.21, Table 2A, Liquid Effluents - Summation of All Releases

Unit: PSL2

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Total Release | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual | Uncertainty |
|-------------------------------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|--------------------|
| A. Fission and Activation Products | | | | | | | |
| 1. Total Release | Ci | 1.78E-02 | 2.71E-03 | 1.86E-03 | 3.31E-02 | 5.54E-02 | |
| 2. Average Concentration | uCi/mL | 5.04E-10 | 2.90E-11 | 3.68E-11 | 5.39E-10 | 2.30E-10 | |
| 3. Percent of Limit | % | | | | | | |
| B. Tritium | | | | | | | |
| 1. Total Release | Ci | 1.07E+02 | 1.39E+01 | 2.98E+01 | 2.71E+02 | 4.22E+02 | |
| 2. Average Concentration | uCi/mL | 3.03E-06 | 1.49E-07 | 5.90E-07 | 4.43E-06 | 1.76E-06 | |
| 3. Percent of Limit | % | | | | | | |
| C. Dissolved and Entrained Gases | | | | | | | |
| 1. Total Release | Ci | 1.66E-02 | 1.10E-05 | 0.00E+00 | 9.97E-04 | 1.76E-02 | |
| 2. Average Concentration | uCi/mL | 4.70E-10 | 1.18E-13 | 0.00E+00 | 1.63E-11 | 7.31E-11 | |
| 3. Percent of Limit | % | | | | | | |
| D. Gross Alpha Activity | | | | | | | |
| 1. Total Release | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | |
| 2. Average Concentration | uCi/mL | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | |
| E. Primary Liquid Release Volume | | | | | | | |
| 1. Total Release | Liters | 3.61E+06 | 3.91E+07 | 2.07E+07 | 2.28E+07 | 8.62E+07 | |
| F. Dilution Volume | | | | | | | |
| 1. Total Release | Liters | 3.53E+10 | 9.34E+10 | 5.06E+10 | 6.13E+10 | 2.41E+11 | |

Reg. Guide 1.21, Table 2A, Liquid Effluents - Summation of All Releases

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Total Release | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual | Uncertainty |
|-------------------------------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|--------------------|
| A. Fission and Activation Products | | | | | | | |
| 1. Total Release | Ci | 3.55E-02 | 5.42E-03 | 3.72E-03 | 6.61E-02 | 1.11E-01 | |
| 2. Average Concentration | uCi/mL | 5.04E-10 | 2.90E-11 | 3.68E-11 | 5.39E-10 | 2.30E-10 | |
| 3. Percent of Limit | % | | | | | | |
| B. Tritium | | | | | | | |
| 1. Total Release | Ci | 2.14E+02 | 2.77E+01 | 5.97E+01 | 5.43E+02 | 8.44E+02 | |
| 2. Average Concentration | uCi/mL | 3.03E-06 | 1.49E-07 | 5.90E-07 | 4.43E-06 | 1.76E-06 | |
| 3. Percent of Limit | % | | | | | | |
| C. Dissolved and Entrained Gases | | | | | | | |
| 1. Total Release | Ci | 3.32E-02 | 2.20E-05 | 0.00E+00 | 1.99E-03 | 3.52E-02 | |
| 2. Average Concentration | uCi/mL | 4.70E-10 | 1.18E-13 | 0.00E+00 | 1.63E-11 | 7.31E-11 | |
| 3. Percent of Limit | % | | | | | | |
| D. Gross Alpha Activity | | | | | | | |
| 1. Total Release | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | |
| 2. Average Concentration | uCi/mL | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | |
| E. Primary Liquid Release Volume | | | | | | | |
| 1. Total Release | Liters | 7.23E+06 | 7.81E+07 | 4.14E+07 | 4.57E+07 | 1.72E+08 | |
| F. Dilution Volume | | | | | | | |
| 1. Total Release | Liters | 7.05E+10 | 1.87E+11 | 1.01E+11 | 1.23E+11 | 4.81E+11 | |

Reg. Guide 1.21, Table 2B, Liquid Effluents - Batch Mode**Unit: PSL1****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|------------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Products | | | | | | |
| C-14 | Ci | 1.28E-02 | 1.13E-03 | 5.85E-04 | 2.86E-02 | 4.31E-02 |
| Be-7 | Ci | 0.00E+00 | 0.00E+00 | 1.35E-05 | 1.35E-04 | 1.49E-04 |
| Cr-51 | Ci | 7.87E-05 | 0.00E+00 | 0.00E+00 | 1.69E-04 | 2.47E-04 |
| Mn-54 | Ci | 6.83E-06 | 1.09E-05 | 7.61E-06 | 3.16E-05 | 5.70E-05 |
| Fe-55 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.98E-04 | 5.98E-04 |
| Fe-59 | Ci | 2.64E-06 | 0.00E+00 | 0.00E+00 | 5.33E-05 | 5.59E-05 |
| Co-57 | Ci | 0.00E+00 | 1.11E-06 | 0.00E+00 | 0.00E+00 | 1.11E-06 |
| Co-58 | Ci | 2.65E-03 | 6.42E-04 | 4.68E-04 | 6.04E-04 | 4.37E-03 |
| Co-60 | Ci | 1.39E-03 | 4.57E-04 | 6.36E-04 | 8.68E-04 | 3.35E-03 |
| Ni-63 | Ci | 0.00E+00 | 2.25E-04 | 0.00E+00 | 6.13E-04 | 8.38E-04 |
| Zn-65 | Ci | 0.00E+00 | 1.15E-05 | 4.63E-06 | 0.00E+00 | 1.61E-05 |
| Zr-95 | Ci | 1.35E-05 | 1.80E-05 | 0.00E+00 | 5.86E-05 | 9.01E-05 |
| Zr-97 | Ci | 1.07E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.07E-04 |
| Nb-95 | Ci | 6.17E-05 | 3.35E-05 | 7.50E-06 | 1.05E-04 | 2.08E-04 |
| Nb-97 | Ci | 2.29E-04 | 8.81E-05 | 1.91E-05 | 1.54E-04 | 4.90E-04 |
| Ag-110m | Ci | 1.97E-04 | 6.24E-05 | 2.07E-05 | 1.12E-04 | 3.92E-04 |
| Sb-124 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.86E-05 | 2.86E-05 |
| Sb-125 | Ci | 3.99E-05 | 0.00E+00 | 0.00E+00 | 5.53E-05 | 9.52E-05 |
| Te-129m | Ci | 5.69E-05 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.69E-05 |
| I-131 | Ci | 1.78E-06 | 0.00E+00 | 0.00E+00 | 2.88E-06 | 4.66E-06 |
| Cs-134 | Ci | 2.34E-06 | 3.08E-06 | 5.12E-06 | 1.98E-04 | 2.08E-04 |
| Cs-137 | Ci | 5.45E-05 | 3.20E-05 | 9.21E-05 | 6.49E-04 | 8.27E-04 |
| Ba-140 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.75E-06 | 8.75E-06 |
| La-140 | Ci | 3.58E-05 | 0.00E+00 | 0.00E+00 | 5.72E-05 | 9.30E-05 |
| Total For Period | Ci | 1.78E-02 | 2.71E-03 | 1.86E-03 | 3.31E-02 | 5.54E-02 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 2B, Liquid Effluents - Batch Mode**Unit: PSL1****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|----------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| B. Tritium | | | | | | |
| H-3 | Ci | 1.07E+02 | 1.39E+01 | 2.98E+01 | 2.71E+02 | 4.22E+02 |
| C. Dissolved and Entrained Gases | | | | | | |
| Xe-135 | Ci | 3.50E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.50E-04 |
| Xe-133m | Ci | 3.39E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.39E-04 |
| Xe-133 | Ci | 1.59E-02 | 0.00E+00 | 0.00E+00 | 9.97E-04 | 1.69E-02 |
| Xe-138 | Ci | 0.00E+00 | 1.10E-05 | 0.00E+00 | 0.00E+00 | 1.10E-05 |
| Total For Period | Ci | 1.66E-02 | 1.10E-05 | 0.00E+00 | 9.97E-04 | 1.76E-02 |
| D. Gross Alpha Activity | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 2B, Liquid Effluents - Batch Mode**Unit: PSL2****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|------------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Products | | | | | | |
| C-14 | Ci | 1.28E-02 | 1.13E-03 | 5.85E-04 | 2.86E-02 | 4.31E-02 |
| Be-7 | Ci | 0.00E+00 | 0.00E+00 | 1.35E-05 | 1.35E-04 | 1.49E-04 |
| Cr-51 | Ci | 7.87E-05 | 0.00E+00 | 0.00E+00 | 1.69E-04 | 2.47E-04 |
| Mn-54 | Ci | 6.83E-06 | 1.09E-05 | 7.61E-06 | 3.16E-05 | 5.70E-05 |
| Fe-55 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.98E-04 | 5.98E-04 |
| Fe-59 | Ci | 2.64E-06 | 0.00E+00 | 0.00E+00 | 5.33E-05 | 5.59E-05 |
| Co-57 | Ci | 0.00E+00 | 1.11E-06 | 0.00E+00 | 0.00E+00 | 1.11E-06 |
| Co-58 | Ci | 2.65E-03 | 6.42E-04 | 4.68E-04 | 6.04E-04 | 4.37E-03 |
| Co-60 | Ci | 1.39E-03 | 4.57E-04 | 6.36E-04 | 8.68E-04 | 3.35E-03 |
| Ni-63 | Ci | 0.00E+00 | 2.25E-04 | 0.00E+00 | 6.13E-04 | 8.38E-04 |
| Zn-65 | Ci | 0.00E+00 | 1.15E-05 | 4.63E-06 | 0.00E+00 | 1.61E-05 |
| Zr-95 | Ci | 1.35E-05 | 1.80E-05 | 0.00E+00 | 5.86E-05 | 9.01E-05 |
| Zr-97 | Ci | 1.07E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.07E-04 |
| Nb-95 | Ci | 6.17E-05 | 3.35E-05 | 7.50E-06 | 1.05E-04 | 2.08E-04 |
| Nb-97 | Ci | 2.29E-04 | 8.81E-05 | 1.91E-05 | 1.54E-04 | 4.90E-04 |
| Ag-110m | Ci | 1.97E-04 | 6.24E-05 | 2.07E-05 | 1.12E-04 | 3.92E-04 |
| Sb-124 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.86E-05 | 2.86E-05 |
| Sb-125 | Ci | 3.99E-05 | 0.00E+00 | 0.00E+00 | 5.53E-05 | 9.52E-05 |
| Te-129m | Ci | 5.69E-05 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.69E-05 |
| I-131 | Ci | 1.78E-06 | 0.00E+00 | 0.00E+00 | 2.88E-06 | 4.66E-06 |
| Cs-134 | Ci | 2.34E-06 | 3.08E-06 | 5.12E-06 | 1.98E-04 | 2.08E-04 |
| Cs-137 | Ci | 5.45E-05 | 3.20E-05 | 9.21E-05 | 6.49E-04 | 8.27E-04 |
| Ba-140 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.75E-06 | 8.75E-06 |
| La-140 | Ci | 3.58E-05 | 0.00E+00 | 0.00E+00 | 5.72E-05 | 9.30E-05 |
| Total For Period | Ci | 1.78E-02 | 2.71E-03 | 1.86E-03 | 3.31E-02 | 5.54E-02 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 2B, Liquid Effluents - Batch Mode**Unit: PSL2****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|----------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| B. Tritium | | | | | | |
| H-3 | Ci | 1.07E+02 | 1.39E+01 | 2.98E+01 | 2.71E+02 | 4.22E+02 |
| C. Dissolved and Entrained Gases | | | | | | |
| Xe-133m | Ci | 3.39E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.39E-04 |
| Xe-135 | Ci | 3.50E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 3.50E-04 |
| Xe-133 | Ci | 1.59E-02 | 0.00E+00 | 0.00E+00 | 9.97E-04 | 1.69E-02 |
| Xe-138 | Ci | 0.00E+00 | 1.10E-05 | 0.00E+00 | 0.00E+00 | 1.10E-05 |
| Total For Period | Ci | 1.66E-02 | 1.10E-05 | 0.00E+00 | 9.97E-04 | 1.76E-02 |
| D. Gross Alpha Activity | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 2B, Liquid Effluents - Continuous Mode

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Nuclides Released | Units | Continuous Mode | | | | |
|------------------------------------|-------|-----------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Products | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| B. Tritium | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| C. Dissolved and Entrained Gases | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| D. Gross Alpha Activity | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 2B, Liquid Effluents - Batch Mode**Unit: Site****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|------------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| A. Fission and Activation Products | | | | | | |
| C-14 | Ci | 2.57E-02 | 2.26E-03 | 1.17E-03 | 5.71E-02 | 8.62E-02 |
| Be-7 | Ci | 0.00E+00 | 0.00E+00 | 2.70E-05 | 2.71E-04 | 2.98E-04 |
| Cr-51 | Ci | 1.57E-04 | 0.00E+00 | 0.00E+00 | 3.37E-04 | 4.94E-04 |
| Mn-54 | Ci | 1.37E-05 | 2.19E-05 | 1.52E-05 | 6.31E-05 | 1.14E-04 |
| Fe-55 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.20E-03 | 1.20E-03 |
| Fe-59 | Ci | 5.29E-06 | 0.00E+00 | 0.00E+00 | 1.07E-04 | 1.12E-04 |
| Co-57 | Ci | 0.00E+00 | 2.23E-06 | 0.00E+00 | 0.00E+00 | 2.23E-06 |
| Co-58 | Ci | 5.30E-03 | 1.28E-03 | 9.37E-04 | 1.21E-03 | 8.73E-03 |
| Co-60 | Ci | 2.77E-03 | 9.15E-04 | 1.27E-03 | 1.74E-03 | 6.70E-03 |
| Ni-63 | Ci | 0.00E+00 | 4.50E-04 | 0.00E+00 | 1.23E-03 | 1.68E-03 |
| Zn-65 | Ci | 0.00E+00 | 2.29E-05 | 9.27E-06 | 0.00E+00 | 3.22E-05 |
| Zr-95 | Ci | 2.70E-05 | 3.60E-05 | 0.00E+00 | 1.17E-04 | 1.80E-04 |
| Zr-97 | Ci | 2.13E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 2.13E-04 |
| Nb-95 | Ci | 1.23E-04 | 6.70E-05 | 1.50E-05 | 2.11E-04 | 4.16E-04 |
| Nb-97 | Ci | 4.58E-04 | 1.76E-04 | 3.82E-05 | 3.08E-04 | 9.80E-04 |
| Ag-110m | Ci | 3.94E-04 | 1.25E-04 | 4.15E-05 | 2.24E-04 | 7.84E-04 |
| Sb-124 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.73E-05 | 5.73E-05 |
| Sb-125 | Ci | 7.98E-05 | 0.00E+00 | 0.00E+00 | 1.11E-04 | 1.90E-04 |
| Te-129m | Ci | 1.14E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.14E-04 |
| I-131 | Ci | 3.55E-06 | 0.00E+00 | 0.00E+00 | 5.77E-06 | 9.32E-06 |
| Cs-134 | Ci | 4.67E-06 | 6.16E-06 | 1.02E-05 | 3.95E-04 | 4.16E-04 |
| Cs-137 | Ci | 1.09E-04 | 6.41E-05 | 1.84E-04 | 1.30E-03 | 1.65E-03 |
| Ba-140 | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.75E-05 | 1.75E-05 |
| La-140 | Ci | 7.16E-05 | 0.00E+00 | 0.00E+00 | 1.14E-04 | 1.86E-04 |
| Total For Period | Ci | 3.55E-02 | 5.42E-03 | 3.72E-03 | 6.61E-02 | 1.11E-01 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 2B, Liquid Effluents - Batch Mode**Unit: Site****Starting: 1-Jan-2023 Ending: 31-Dec-2023**

| Nuclides Released | Units | Batch Mode | | | | |
|----------------------------------|-------|-------------|-------------|-------------|-------------|----------|
| | | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
| B. Tritium | | | | | | |
| H-3 | Ci | 2.14E+02 | 2.77E+01 | 5.97E+01 | 5.43E+02 | 8.44E+02 |
| C. Dissolved and Entrained Gases | | | | | | |
| Xe-133m | Ci | 6.77E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 6.77E-04 |
| Xe-135 | Ci | 6.99E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 6.99E-04 |
| Xe-133 | Ci | 3.18E-02 | 0.00E+00 | 0.00E+00 | 1.99E-03 | 3.38E-02 |
| Xe-138 | Ci | 0.00E+00 | 2.20E-05 | 0.00E+00 | 0.00E+00 | 2.20E-05 |
| Total For Period | Ci | 3.32E-02 | 2.20E-05 | 0.00E+00 | 1.99E-03 | 3.52E-02 |
| D. Gross Alpha Activity | | | | | | |
| No Nuclides Found | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |

If Not Detected, Nuclide is Not Reported. Zeroes in this table indicates that no radioactivity was present at detectable levels.

Reg. Guide 1.21, Table 5A and 5B - Liquid and Gas Batch Release Summary

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| A. Liquid Batch Release Totals | Units | 1st Quarter | 2nd Quarter | 3rd Quarter | 4th Quarter | Year Totals |
|---------------------------------------|--------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| 1. Number of Batch Releases | | 22 | 14 | 13 | 17 | 66 |
| 2. Total duration of batch releases | min | 2.32E+04 | 4.81E+04 | 2.60E+04 | 3.16E+04 | 1.29E+05 |
| 3. Maximum batch release duration | min | 4.83E+03 | 8.45E+03 | 9.54E+03 | 8.46E+03 | 9.54E+03 |
| 4. Average batch release duration | min | 1.06E+03 | 3.43E+03 | 2.00E+03 | 1.86E+03 | 1.95E+03 |
| 5. Minimum batch release duration | min | 5.66E+02 | 2.03E+02 | 3.70E+02 | 6.92E+02 | 2.03E+02 |
| B. Gas Batch Release Totals | Units | 1st Quarter | 2nd Quarter | 3rd Quarter | 4th Quarter | Year Totals |
| 1. Number of Batch Releases | | 50 | 53 | 60 | 57 | 220 |
| 2. Total duration of batch releases | min | 4.43E+04 | 1.29E+04 | 1.33E+04 | 1.41E+04 | 8.45E+04 |
| 3. Maximum batch release duration | min | 1.01E+04 | 5.95E+02 | 5.90E+02 | 6.00E+02 | 1.01E+04 |
| 4. Average batch release duration | min | 8.85E+02 | 2.42E+02 | 2.22E+02 | 2.47E+02 | 3.84E+02 |
| 5. Minimum batch release duration | min | 2.40E+01 | 4.20E+01 | 2.00E+01 | 3.00E+01 | 2.00E+01 |

Reg. Guide 1.21, Table 6A and 6B - Liquid and Gas Abnormal Release Summary

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| A. Liquid Abnormal Release Totals | Units | 1st Quarter | 2nd Quarter | 3rd Quarter | 4th Quarter | Year Totals |
|------------------------------------------|--------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| 1. Number of Abnormal Releases | | 0 | 0 | 0 | 0 | 0 |
| 2. Total Activity of abnormal releases | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| B. Gas Abnormal Release Totals | Units | 1st Quarter | 2nd Quarter | 3rd Quarter | 4th Quarter | Year Totals |
| 1. Number of Abnormal Releases | | 0 | 0 | 1 | 0 | 1 |
| 2. Total Activity of abnormal releases | Ci | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |

3.2 Solid Waste Storage and Shipments

WMG Suite 9.5.2

Reg Guide Report

Report Date: 02/12/2024



NRC Regulatory Guide 1.21 Report

Solid Waste Shipped Offsite for Disposal and Estimates of Major Nuclides by Waste Class and Stream

During Period From: 01/01/2023 to 12/31/2023

| Resins, Filters, And Evaporator Bottoms | | | |
|-----------------------------------------|-----------------|----------------|----------|
| Waste Class | Volume | | Curies |
| | ft ³ | m ³ | Shipped |
| A | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| B | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| C | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| Unclassified | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| All | 0.00E+00 | 0.00E+00 | 0.00E+00 |

Major Nuclides for the Above Table:

| Dry Active Waste (DAW) | | | |
|------------------------|-----------------|----------------|----------|
| Waste Class | Volume | | Curies |
| | ft ³ | m ³ | Shipped |
| A | 2.39E+04 | 6.76E+02 | 1.77E+00 |
| B | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| C | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| Unclassified | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| All | 2.39E+04 | 6.76E+02 | 1.77E+00 |

Major Nuclides for the Above Table:

H-3, C-14, Cr-51, Fe-55, Co-58, Co-60, Ni-59, Ni-63, Sr-90, Zr-95, Nb-94, Nb-95, Tc-99, Ag-110m, I-129, Cs-137, Ce-144, Pu-238, Pu-239, Am-241, Cm-242, Cm-243

| Irradiated Components | | | |
|-----------------------|-----------------|----------------|----------|
| Waste Class | Volume | | Curies |
| | ft ³ | m ³ | Shipped |
| A | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| B | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| C | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| Unclassified | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| All | 0.00E+00 | 0.00E+00 | 0.00E+00 |

Major Nuclides for the Above Table:



NRC Regulatory Guide 1.21 Report

Solid Waste Shipped Offsite for Disposal and Estimates of Major Nuclides by Waste Class and Stream

During Period From: 01/01/2023 to 12/31/2023

| Other Waste | | | |
|-------------------------------------|-----------------|----------------|----------------|
| Waste Class | Volume | | Curies Shipped |
| | ft ³ | m ³ | |
| A | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| B | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| C | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| Unclassified | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| All | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| Major Nuclides for the Above Table: | | | |

| Sum Of All Low-Level Waste Shipped From Site | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------|----------------|
| Waste Class | Volume | | Curies Shipped |
| | ft ³ | m ³ | |
| A | 2.39E+04 | 6.76E+02 | 1.77E+00 |
| B | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| C | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| Unclassified | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| All | 2.39E+04 | 6.76E+02 | 1.77E+00 |
| Major Nuclides for the Above Table: | | | |
| H-3, C-14, Cr-51, Fe-55, Co-58, Co-60, Ni-59, Ni-63, Sr-90, Zr-95, Nb-94, Nb-95, Tc-99, Ag-110m, I-129, Cs-137, Ce-144, Pu-238, Pu-239, Am-241, Cm-242, Cm-243 | | | |



NRC Regulatory Guide 1.21 Activity Report

Solid Waste Shipped Offsite for Disposal and Estimates of Major Nuclides by Shipment, Package, and Category

During Period From: 01/01/2023 to 12/31/2023

Percent Cutoff: 1.0%

| Dry Active Waste | | |
|------------------|-----------|---------------|
| Waste Class A | | |
| Nuclide Name | Abundance | Activity (Ci) |
| H-3 | 20.33% | 3.61E-01 |
| Cr-51 | 1.05% | 1.86E-02 |
| Fe-55 | 45.77% | 8.12E-01 |
| Co-58 | 1.96% | 3.48E-02 |
| Co-60 | 15.57% | 2.76E-01 |
| Ni-63 | 4.32% | 7.66E-02 |
| Zr-95 | 2.83% | 5.01E-02 |
| Nb-95 | 5.55% | 9.85E-02 |
| Total Combined | | |
| Nuclide Name | Abundance | Activity (Ci) |
| H-3 | 20.33% | 3.61E-01 |
| Cr-51 | 1.05% | 1.86E-02 |
| Fe-55 | 45.77% | 8.12E-01 |
| Co-58 | 1.96% | 3.48E-02 |
| Co-60 | 15.57% | 2.76E-01 |
| Ni-63 | 4.32% | 7.66E-02 |
| Zr-95 | 2.83% | 5.01E-02 |
| Nb-95 | 5.55% | 9.85E-02 |



NRC Regulatory Guide 1.21 Activity Report

Solid Waste Shipped Offsite for Disposal and Estimates of Major Nuclides by Shipment, Package, and Category

During Period From: 01/01/2023 to 12/31/2023

Percent Cutoff: 1.0%

| Sum of All 4 Categories | | |
|-------------------------|-----------|---------------|
| Waste Class A | | |
| Nuclide Name | Abundance | Activity (Ci) |
| H-3 | 20.33% | 3.61E-01 |
| Cr-51 | 1.05% | 1.86E-02 |
| Fe-55 | 45.77% | 8.12E-01 |
| Co-58 | 1.96% | 3.48E-02 |
| Co-60 | 15.57% | 2.76E-01 |
| Ni-63 | 4.32% | 7.66E-02 |
| Zr-95 | 2.83% | 5.01E-02 |
| Nb-95 | 5.55% | 9.85E-02 |
| Total Combined | | |
| Nuclide Name | Abundance | Activity (Ci) |
| H-3 | 20.33% | 3.61E-01 |
| Cr-51 | 1.05% | 1.86E-02 |
| Fe-55 | 45.77% | 8.12E-01 |
| Co-58 | 1.96% | 3.48E-02 |
| Co-60 | 15.57% | 2.76E-01 |
| Ni-63 | 4.32% | 7.66E-02 |
| Zr-95 | 2.83% | 5.01E-02 |
| Nb-95 | 5.55% | 9.85E-02 |

WMG Suite 9.5.2

Reg Guide Report

Report Date: 02/12/2024

During Period From: 01/01/2023 to 12/31/2023



Total Shipments by Carrier

Number of Shipments per each carrier

| Number of Shipments | Mode of Transportation | Destination |
|---------------------|------------------------|------------------------------------------------------------|
| 3 | Hittman Transport (TN) | Energy Solutions, (DTK) Gallaher Road 628 Gallaher Road |
| 4 | Hittman Transport (TN) | Energy Solutions, Memphis 1790 Dock St |
| 13 | Hittman Transport (TN) | Energy Solutions Bear Creek 1560 Bear Creek Road |

**NRC Regulatory Guide 1.21 Report
Shipment and Package Summary**



Solid Waste Shipped Offsite for Disposal

During Period from: 1/1/2023 to 12/31/2023

| Shipment Date | Manifest ID | Destination | Package Name | Category Name | NRC Class | Disposition |
|---------------|----------------|---------------------------------------|----------------|------------------|-----------|-----------------|
| 1/20/2023 | FPL/PSL 23-006 | Energy Solutions Bear Creek | Green 106 | Dry Active Waste | A | A LSA-II |
| | | | Pipefitter 124 | Dry Active Waste | A | A LSA-II |
| 2/10/2023 | FPL/PSL 23-012 | Energy Solutions Bear Creek | ESUU300470 | Dry Active Waste | A | A LSA-II |
| 2/15/2023 | FPL/PSL 23-015 | Energy Solutions Bear Creek | PSL 208188 | Dry Active Waste | A | Exempt Quantity |
| | | | ESUU300650 | Dry Active Waste | A | A LSA-II |
| 3/8/2023 | FPL/PSL 23-022 | Energy Solutions, (DTK) Gallaher Road | ESUU200638 | Dry Active Waste | A | Exempt Quantity |
| | | | ESUU200522 | Dry Active Waste | A | Exempt Quantity |
| 3/16/2023 | FPL/PSL 23-027 | Energy Solutions Bear Creek | ESUU200556 | Dry Active Waste | A | A LSA-II |
| | | | ESUU200623 | Dry Active Waste | A | A LSA-II |
| 3/16/2023 | FPL/PSL 23-028 | Energy Solutions Bear Creek | ESUU200306 | Dry Active Waste | A | A LSA-II |
| | | | ESUU200990 | Dry Active Waste | A | A LSA-II |
| 3/20/2023 | FPL/PSL 23-029 | Energy Solutions Bear Creek | ESUU200750 | Dry Active Waste | A | A LSA-II |
| | | | ESUU200676 | Dry Active Waste | A | A LSA-II |
| 3/22/2023 | FPL/PSL 23-031 | Energy Solutions Bear Creek | M-01 | Dry Active Waste | A | A LSA-II |
| | | | B-02 | Dry Active Waste | A | A LSA-II |
| | | | B-01 | Dry Active Waste | A | A LSA-II |
| 3/27/2023 | FPL/PSL 23-034 | Energy Solutions, (DTK) Gallaher Road | ACCU218537-5 | Dry Active Waste | A | Exempt Quantity |
| 3/27/2023 | FPL/PSL 23-033 | Energy Solutions, (DTK) Gallaher Road | ACCU218224-7 | Dry Active Waste | A | Exempt Quantity |
| 7/10/2023 | FPL/PSL 23-049 | Energy Solutions Bear Creek | ESUU100674 | Dry Active Waste | A | A LSA-II |



Solid Waste Shipped Offsite for Disposal

During Period from: 1/1/2023 to 12/31/2023

| | | | | | | |
|-----------|----------------|-----------------------------|--------------|------------------|---|------------------|
| 7/10/2023 | FPL/PSL 23-047 | Energy Solutions Bear Creek | ESUU100573 | Dry Active Waste | A | A LSA-II |
| 7/10/2023 | FPL/PSL 23-046 | Energy Solutions Bear Creek | ESUU100629 | Dry Active Waste | A | A LSA-II |
| 7/10/2023 | FPL/PSL 23-048 | Energy Solutions Bear Creek | ESUU100306 | Dry Active Waste | A | A LSA-II |
| 7/10/2023 | FPL/PSL 23-045 | Energy Solutions Bear Creek | ESUU100274 | Dry Active Waste | A | A LSA-II |
| 8/9/2023 | FPL/PSL 23-057 | Energy Solutions Bear Creek | ESUU200340 | Dry Active Waste | A | Exempt Quantity |
| 8/16/2023 | FPL/PSL 23-061 | Energy Solutions, Memphis | ESUU200546 | Dry Active Waste | A | Exempt Quantity |
| 8/16/2023 | FPL/PSL 23-062 | Energy Solutions, Memphis | ESUU200639 | Dry Active Waste | A | Exempt Quantity |
| 8/21/2023 | FPL/PSL 23-063 | Energy Solutions, Memphis | ACCU218224-7 | Dry Active Waste | A | Limited Quantity |
| 9/15/2023 | FPL/PSL 23-065 | Energy Solutions, Memphis | ESUU200960 | Dry Active Waste | A | Exempt Quantity |
| | | | ESUU200847 | Dry Active Waste | A | Exempt Quantity |

3.3 Dose Assessments

Reg. Guide 1.21, App B, Sec Doses to a member of the public due to Liquid Releases

Unit: PSL1

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Organ Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|------------------|-------|-------------|-------------|-------------|-------------|----------|
| Bone | mRem | 3.38E-04 | 5.85E-05 | 1.54E-05 | 9.51E-04 | 1.29E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Liver | mRem | 4.89E-04 | 5.64E-05 | 5.42E-05 | 2.27E-03 | 2.82E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Total Body | mRem | 5.32E-04 | 4.95E-05 | 5.40E-05 | 1.24E-03 | 1.82E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Thyroid | mRem | 4.60E-04 | 2.93E-05 | 3.52E-05 | 9.12E-04 | 1.43E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Kidney | mRem | 3.90E-04 | 4.11E-05 | 4.74E-05 | 8.19E-04 | 1.30E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Lung | mRem | 4.61E-04 | 2.95E-05 | 3.58E-05 | 2.38E-03 | 2.86E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| GI-Lli | mRem | 1.86E-03 | 3.66E-04 | 1.85E-04 | 2.41E-03 | 4.82E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Reg. Guide 1.21, App B, Sec Doses to a member of the public due to Liquid Releases

Unit: PSL2

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Organ Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|-------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|
| Bone | mRem | 3.38E-04 | 5.85E-05 | 1.54E-05 | 9.51E-04 | 1.29E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Liver | mRem | 4.89E-04 | 5.64E-05 | 5.42E-05 | 2.27E-03 | 2.82E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Total Body | mRem | 5.32E-04 | 4.95E-05 | 5.40E-05 | 1.24E-03 | 1.82E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Thyroid | mRem | 4.60E-04 | 2.93E-05 | 3.52E-05 | 9.12E-04 | 1.43E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Kidney | mRem | 3.90E-04 | 4.11E-05 | 4.74E-05 | 8.19E-04 | 1.30E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Lung | mRem | 4.61E-04 | 2.95E-05 | 3.58E-05 | 2.38E-03 | 2.86E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| GI-Lli | mRem | 1.86E-03 | 3.66E-04 | 1.85E-04 | 2.41E-03 | 4.82E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Reg. Guide 1.21, App B, Sec Doses to a member of the public due to Liquid Releases

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Organ Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|-------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|
| Bone | mRem | 6.77E-04 | 1.17E-04 | 3.08E-05 | 1.90E-03 | 2.57E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Liver | mRem | 9.77E-04 | 1.13E-04 | 1.08E-04 | 4.53E-03 | 5.64E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Total Body | mRem | 1.06E-03 | 9.89E-05 | 1.08E-04 | 2.47E-03 | 3.63E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Thyroid | mRem | 9.20E-04 | 5.85E-05 | 7.03E-05 | 1.82E-03 | 2.87E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Kidney | mRem | 7.79E-04 | 8.21E-05 | 9.48E-05 | 1.64E-03 | 2.59E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Lung | mRem | 9.22E-04 | 5.89E-05 | 7.17E-05 | 4.76E-03 | 5.71E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| GI-Lli | mRem | 3.72E-03 | 7.33E-04 | 3.69E-04 | 4.82E-03 | 9.63E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Reg. Guide 1.21, App B, Sec Air Doses Due To Gaseous Releases

Unit: PSL1

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| NG Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|
| Gamma Air | mRad | 8.94E-05 | 9.08E-05 | 8.12E-05 | 8.74E-05 | 3.49E-04 |
| Limit | mRad | | | | | |
| Percent of Limit | % | | | | | |
| Beta Air | mRad | 3.31E-05 | 9.18E-05 | 3.04E-05 | 3.24E-05 | 1.88E-04 |
| Limit | mRad | | | | | |
| Percent of Limit | % | | | | | |
| NG Total Body | mRem | 8.49E-05 | 8.31E-05 | 7.71E-05 | 8.30E-05 | 3.28E-04 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| NG Skin | mRem | 1.24E-04 | 1.50E-04 | 1.13E-04 | 1.22E-04 | 5.10E-04 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Reg. Guide 1.21, App B, Sec Air Doses Due To Gaseous Releases

Unit: PSL2

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| NG Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|
| Gamma Air | mRad | 1.64E-03 | 2.53E-03 | 1.64E-04 | 4.22E-04 | 4.75E-03 |
| Limit | mRad | | | | | |
| Percent of Limit | % | | | | | |
| Beta Air | mRad | 6.72E-04 | 1.35E-03 | 6.92E-05 | 2.49E-04 | 2.34E-03 |
| Limit | mRad | | | | | |
| Percent of Limit | % | | | | | |
| NG Total Body | mRem | 1.55E-03 | 2.42E-03 | 1.55E-04 | 3.97E-04 | 4.53E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| NG Skin | mRem | 2.30E-03 | 3.96E-03 | 2.31E-04 | 6.14E-04 | 7.10E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Reg. Guide 1.21, App B, Sec Air Doses Due To Gaseous Releases

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| NG Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|
| Gamma Air | mRad | 1.73E-03 | 2.62E-03 | 2.45E-04 | 5.09E-04 | 5.10E-03 |
| Limit | mRad | | | | | |
| Percent of Limit | % | | | | | |
| Beta Air | mRad | 7.05E-04 | 1.44E-03 | 9.96E-05 | 2.82E-04 | 2.53E-03 |
| Limit | mRad | | | | | |
| Percent of Limit | % | | | | | |
| NG Total Body | mRem | 1.64E-03 | 2.50E-03 | 2.32E-04 | 4.80E-04 | 4.86E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| NG Skin | mRem | 2.43E-03 | 4.11E-03 | 3.44E-04 | 7.36E-04 | 7.61E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Reg. Guide 1.21, App B, Sec Doses due to Radioiodines, Tritium, and Particulates in Gaseous Releases

Unit: PSL1

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Organ Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|-------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|
| Bone | mRem | 7.26E-04 | 7.31E-04 | 1.32E-03 | 1.16E-03 | 3.94E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Liver | mRem | 6.50E-04 | 6.90E-04 | 1.22E-03 | 1.61E-03 | 4.17E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Total Body | mRem | 6.50E-04 | 6.90E-04 | 1.22E-03 | 1.61E-03 | 4.16E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Thyroid | mRem | 6.50E-04 | 6.90E-04 | 1.22E-03 | 1.61E-03 | 4.16E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Kidney | mRem | 1.03E-04 | 1.17E-04 | 6.77E-04 | 7.49E-04 | 1.65E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Lung | mRem | 6.50E-04 | 6.90E-04 | 1.23E-03 | 1.61E-03 | 4.18E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| GI-Lli | mRem | 6.50E-04 | 6.90E-04 | 1.22E-03 | 1.61E-03 | 4.16E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Reg. Guide 1.21, App B, Sec Doses due to Radioiodines, Tritium, and Particulates in Gaseous Releases

Unit: PSL2

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Organ Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|-------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|
| Bone | mRem | 4.87E-04 | 7.77E-04 | 7.45E-04 | 1.01E-03 | 3.02E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Liver | mRem | 4.24E-04 | 7.29E-04 | 7.05E-04 | 1.38E-03 | 3.24E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Total Body | mRem | 4.24E-04 | 7.29E-04 | 7.05E-04 | 1.38E-03 | 3.24E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Thyroid | mRem | 4.27E-04 | 7.29E-04 | 7.05E-04 | 1.39E-03 | 3.25E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Kidney | mRem | 6.35E-05 | 1.55E-04 | 1.20E-04 | 6.36E-04 | 9.75E-04 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Lung | mRem | 4.24E-04 | 7.30E-04 | 7.05E-04 | 1.40E-03 | 3.26E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| GI-LI | mRem | 4.24E-04 | 7.29E-04 | 7.05E-04 | 1.38E-03 | 3.24E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Reg. Guide 1.21, App B, Sec Doses due to Radioiodines, Tritium, and Particulates in Gaseous Releases

Unit: Site

Starting: 1-Jan-2023 Ending: 31-Dec-2023

| Organ Dose | Units | 1ST Quarter | 2ND Quarter | 3RD Quarter | 4TH Quarter | Annual |
|-------------------|--------------|--------------------|--------------------|--------------------|--------------------|---------------|
| Bone | mRem | 1.21E-03 | 1.51E-03 | 2.07E-03 | 2.17E-03 | 6.96E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Liver | mRem | 1.07E-03 | 1.42E-03 | 1.92E-03 | 2.99E-03 | 7.41E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Total Body | mRem | 1.07E-03 | 1.42E-03 | 1.92E-03 | 2.99E-03 | 7.40E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Thyroid | mRem | 1.08E-03 | 1.42E-03 | 1.92E-03 | 2.99E-03 | 7.41E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Kidney | mRem | 1.66E-04 | 2.72E-04 | 7.97E-04 | 1.38E-03 | 2.62E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| Lung | mRem | 1.07E-03 | 1.42E-03 | 1.94E-03 | 3.01E-03 | 7.44E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |
| GI-Lli | mRem | 1.07E-03 | 1.42E-03 | 1.92E-03 | 2.99E-03 | 7.40E-03 |
| Limit | mRem | | | | | |
| Percent of Limit | % | | | | | |

Period: Ann, 2023 Site/Unit/Discharge Point: PSL1

Site Boundary NNG Doserate Summary - Note: All Doses in mRem/yr

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-Lli | Skin |
|----------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| NW Site Boundary - In | Infant | 3.940E-03 | 4.167E-03 | 4.160E-03 | 4.160E-03 | 1.645E-03 | 4.180E-03 | 4.160E-03 | 0.000E+00 |
| WNW Site Boundary - I | Infant | 1.934E-04 | 1.934E-04 | 1.934E-04 | 1.934E-04 | 1.934E-04 | 1.934E-04 | 1.934E-04 | 0.000E+00 |
| Maximum Doserate by Organ: | | 3.940E-03 | 4.167E-03 | 4.160E-03 | 4.160E-03 | 1.645E-03 | 4.180E-03 | 4.160E-03 | 0.000E+00 |

Maximum Organ Doserate (mRem/yr): 4.180E-03

Maximum Total Body Doserate (mRem/yr): 4.160E-03

Site Boundary NG Doserate Summary

| Gas Receptor Location | Gamma (mRad/yr) | Beta (mRad/yr) | Total Body (mRem/yr) | Skin (mRem/yr) |
|-----------------------|-----------------|----------------|----------------------|----------------|
| NW Site Boundary | 3.487E-04 | 1.877E-04 | 3.280E-04 | 5.096E-04 |
| WNW Site Boundary | 3.003E-04 | 1.617E-04 | 2.825E-04 | 4.390E-04 |
| Maximum NG Dose Rate: | 3.487E-04 | 1.877E-04 | 3.280E-04 | 5.096E-04 |

Period: Ann, 2023

Site/Unit/Discharge Point: PSL1

Maximum Individual NNG Dose Summary - Note: All Doses in mRem

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-LI | Skin |
|-------------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| NW - Near Milk - Adult | Adult | 8.939E-05 | 9.901E-05 | 8.669E-05 | 6.350E-05 | 7.539E-05 | 7.009E-05 | 7.789E-05 | 0.000E+00 |
| NW Near Milk - Child | Child | 1.714E-04 | 1.679E-04 | 7.888E-05 | 6.426E-05 | 7.604E-05 | 7.817E-05 | 7.858E-05 | 0.000E+00 |
| NW Near Milk - Infant | Infant | 2.883E-04 | 3.153E-04 | 7.785E-05 | 6.587E-05 | 7.597E-05 | 9.557E-05 | 7.854E-05 | 0.000E+00 |
| NW Near Milk - Teenager | Teenager | 1.084E-04 | 1.240E-04 | 8.457E-05 | 6.370E-05 | 7.886E-05 | 7.500E-05 | 8.197E-05 | 0.000E+00 |
| SE Nearest Res - Adult | Adult | 3.714E-04 | 3.721E-04 | 3.712E-04 | 3.693E-04 | 3.703E-04 | 3.820E-04 | 3.700E-04 | 0.000E+00 |
| SE Nearest Res - Child | Child | 3.731E-04 | 3.728E-04 | 3.699E-04 | 3.694E-04 | 3.698E-04 | 3.816E-04 | 3.696E-04 | 0.000E+00 |
| SE Nearest Res - Infant | Infant | 3.723E-04 | 3.725E-04 | 3.695E-04 | 3.693E-04 | 3.695E-04 | 3.785E-04 | 3.694E-04 | 0.000E+00 |
| SE Nearest Res - Teenager | Teenager | 3.721E-04 | 3.729E-04 | 3.706E-04 | 3.693E-04 | 3.703E-04 | 3.860E-04 | 3.699E-04 | 0.000E+00 |
| SE Visitor - Lifeguard 1.0 mi | Adult | 1.724E-04 | 1.727E-04 | 1.723E-04 | 1.715E-04 | 1.719E-04 | 1.771E-04 | 1.718E-04 | 0.000E+00 |
| W Near Garden - Adult | Adult | 1.741E-04 | 1.743E-04 | 1.740E-04 | 1.732E-04 | 1.736E-04 | 1.785E-04 | 1.735E-04 | 0.000E+00 |
| W Near Garden - Child | Child | 1.748E-04 | 1.747E-04 | 1.734E-04 | 1.732E-04 | 1.734E-04 | 1.783E-04 | 1.733E-04 | 0.000E+00 |
| W Near Garden - Teenager | Teenager | 1.744E-04 | 1.747E-04 | 1.738E-04 | 1.732E-04 | 1.736E-04 | 1.801E-04 | 1.735E-04 | 0.000E+00 |
| Maximum Dose by Organ: | | 3.731E-04 | 3.729E-04 | 3.712E-04 | 3.694E-04 | 3.703E-04 | 3.860E-04 | 3.700E-04 | 0.000E+00 |

Maximum Organ Dose (mRem): 3.860E-04

Maximum Total Body Dose (mRem): 3.712E-04

Maximum Individual NG Dose Summary

| Gas Receptor Location | Gamma (mRad) | Beta (mRad) | Total Body (mRem) | Skin (mRem) |
|--------------------------------|--------------|-------------|-------------------|-------------|
| NW Near Milk 4.25 mi | 3.051E-05 | 1.643E-05 | 2.870E-05 | 4.459E-05 |
| SE Nearest Res 1.52 mi 142 deg | 1.552E-04 | 8.355E-05 | 1.460E-04 | 2.268E-04 |
| SE Visitor @ 1 mi | 6.719E-05 | 3.618E-05 | 6.321E-05 | 9.822E-05 |
| W Near Gard 2.0 miles | 5.339E-05 | 2.874E-05 | 5.022E-05 | 7.804E-05 |
| Maximum NG Dose: | 1.552E-04 | 8.355E-05 | 1.460E-04 | 2.268E-04 |

Period: Ann, 2023

Site/Unit/Discharge Point: PSL2

Site Boundary NNG Doserate Summary - Note: All Doses in mRem/yr

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-LI | Skin |
|----------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| NW Site Boundary - In | Infant | 3.021E-03 | 3.242E-03 | 3.242E-03 | 3.248E-03 | 9.752E-04 | 3.259E-03 | 3.242E-03 | 0.000E+00 |
| WNW Site Boundary - I | Infant | 1.143E-04 | 1.143E-04 | 1.143E-04 | 1.143E-04 | 1.143E-04 | 1.143E-04 | 1.143E-04 | 0.000E+00 |
| Maximum Doserate by Organ: | | 3.021E-03 | 3.242E-03 | 3.242E-03 | 3.248E-03 | 9.752E-04 | 3.259E-03 | 3.242E-03 | 0.000E+00 |

Maximum Organ Doserate (mRem/yr): 3.259E-03

Maximum Total Body Doserate (mRem/yr): 3.242E-03

Site Boundary NG Doserate Summary

| Gas Receptor Location | Gamma (mRad/yr) | Beta (mRad/yr) | Total Body (mRem/yr) | Skin (mRem/yr) |
|-----------------------|-----------------|----------------|----------------------|----------------|
| NW Site Boundary | 4.751E-03 | 2.339E-03 | 4.527E-03 | 7.103E-03 |
| WNW Site Boundary | 4.093E-03 | 2.015E-03 | 3.900E-03 | 6.118E-03 |
| Maximum NG Dose Rate: | 4.751E-03 | 2.339E-03 | 4.527E-03 | 7.103E-03 |

Period: Ann, 2023

Site/Unit/Discharge Point: PSL2

Maximum Individual NNG Dose Summary - Note: All Doses in mRem

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-Lli | Skin |
|-------------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| NW - Near Milk - Adult | Adult | 2.476E-05 | 2.484E-05 | 2.480E-05 | 4.566E-05 | 2.483E-05 | 2.732E-05 | 2.523E-05 | 0.000E+00 |
| NW Near Milk - Child | Child | 2.490E-05 | 2.497E-05 | 2.499E-05 | 8.593E-05 | 2.484E-05 | 2.720E-05 | 2.507E-05 | 0.000E+00 |
| NW Near Milk - Infant | Infant | 2.510E-05 | 2.528E-05 | 2.520E-05 | 1.714E-04 | 2.483E-05 | 2.656E-05 | 2.502E-05 | 0.000E+00 |
| NW Near Milk - Teenager | Teenager | 2.479E-05 | 2.489E-05 | 2.485E-05 | 5.603E-05 | 2.487E-05 | 2.811E-05 | 2.525E-05 | 0.000E+00 |
| SE Nearest Res - Adult | Adult | 1.446E-04 | 1.447E-04 | 1.447E-04 | 1.468E-04 | 1.447E-04 | 1.557E-04 | 1.452E-04 | 0.000E+00 |
| SE Nearest Res - Child | Child | 1.446E-04 | 1.447E-04 | 1.446E-04 | 1.475E-04 | 1.446E-04 | 1.552E-04 | 1.448E-04 | 0.000E+00 |
| SE Nearest Res - Infant | Infant | 1.446E-04 | 1.447E-04 | 1.446E-04 | 1.473E-04 | 1.446E-04 | 1.525E-04 | 1.447E-04 | 0.000E+00 |
| SE Nearest Res - Teenager | Teenager | 1.446E-04 | 1.447E-04 | 1.447E-04 | 1.472E-04 | 1.447E-04 | 1.590E-04 | 1.451E-04 | 0.000E+00 |
| SE Visitor - Lifeguard 1.0 mi | Adult | 6.717E-05 | 6.722E-05 | 6.718E-05 | 6.813E-05 | 6.718E-05 | 7.199E-05 | 6.741E-05 | 0.000E+00 |
| W Near Garden - Adult | Adult | 6.784E-05 | 6.788E-05 | 6.785E-05 | 6.875E-05 | 6.785E-05 | 7.239E-05 | 6.806E-05 | 0.000E+00 |
| W Near Garden - Child | Child | 6.784E-05 | 6.786E-05 | 6.784E-05 | 6.901E-05 | 6.784E-05 | 7.218E-05 | 6.792E-05 | 0.000E+00 |
| W Near Garden - Teenager | Teenager | 6.784E-05 | 6.788E-05 | 6.784E-05 | 6.890E-05 | 6.785E-05 | 7.378E-05 | 6.803E-05 | 0.000E+00 |
| Maximum Dose by Organ: | | 1.446E-04 | 1.447E-04 | 1.447E-04 | 1.714E-04 | 1.447E-04 | 1.590E-04 | 1.452E-04 | 0.000E+00 |

Maximum Organ Dose (mRem): 1.714E-04

Maximum Total Body Dose (mRem): 1.447E-04

Maximum Individual NG Dose Summary

| Gas Receptor Location | Gamma (mRad) | Beta (mRad) | Total Body (mRem) | Skin (mRem) |
|--------------------------------|--------------|-------------|-------------------|-------------|
| NW Near Milk 4.25 mi | 4.157E-04 | 2.047E-04 | 3.961E-04 | 6.215E-04 |
| SE Nearest Res 1.52 mi 142 deg | 2.115E-03 | 1.041E-03 | 2.015E-03 | 3.161E-03 |
| SE Visitor @ 1 mi | 9.157E-04 | 4.508E-04 | 8.725E-04 | 1.369E-03 |
| W Near Gard 2.0 miles | 7.275E-04 | 3.582E-04 | 6.933E-04 | 1.088E-03 |
| Maximum NG Dose: | 2.115E-03 | 1.041E-03 | 2.015E-03 | 3.161E-03 |

Period: Ann, 2023

Site/Unit/Discharge Point: Site

Site Boundary NNG Doserate Summary - Note: All Doses in mRem/yr

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-LI | Skin |
|----------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| NW Site Boundary - In | Infant | 6.961E-03 | 7.409E-03 | 7.403E-03 | 7.408E-03 | 2.620E-03 | 7.439E-03 | 7.402E-03 | 0.000E+00 |
| WNW Site Boundary - I | Infant | 3.078E-04 | 3.078E-04 | 3.078E-04 | 3.078E-04 | 3.078E-04 | 3.078E-04 | 3.078E-04 | 0.000E+00 |
| Maximum Doserate by Organ: | | 6.961E-03 | 7.409E-03 | 7.403E-03 | 7.408E-03 | 2.620E-03 | 7.439E-03 | 7.402E-03 | 0.000E+00 |

Maximum Organ Doserate (mRem/yr): 7.439E-03

Maximum Total Body Doserate (mRem/yr): 7.403E-03

Site Boundary NG Doserate Summary

| Gas Receptor Location | Gamma (mRad/yr) | Beta (mRad/yr) | Total Body (mRem/yr) | Skin (mRem/yr) |
|-----------------------|-----------------|----------------|----------------------|----------------|
| NW Site Boundary | 5.100E-03 | 2.527E-03 | 4.855E-03 | 7.612E-03 |
| WNW Site Boundary | 4.393E-03 | 2.177E-03 | 4.183E-03 | 6.557E-03 |
| Maximum NG Dose Rate: | 5.100E-03 | 2.527E-03 | 4.855E-03 | 7.612E-03 |

Period: Ann, 2023

Site/Unit/Discharge Point: Site

Maximum Individual NNG Dose Summary - Note: All Doses in mRem

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-LI | Skin |
|-------------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| NW - Near Milk - Adult | Adult | 1.142E-04 | 1.238E-04 | 1.115E-04 | 1.092E-04 | 1.002E-04 | 9.740E-05 | 1.031E-04 | 0.000E+00 |
| NW Near Milk - Child | Child | 1.963E-04 | 1.928E-04 | 1.039E-04 | 1.502E-04 | 1.009E-04 | 1.054E-04 | 1.037E-04 | 0.000E+00 |
| NW Near Milk - Infant | Infant | 3.134E-04 | 3.405E-04 | 1.030E-04 | 2.373E-04 | 1.008E-04 | 1.221E-04 | 1.036E-04 | 0.000E+00 |
| NW Near Milk - Teenager | Teenager | 1.332E-04 | 1.489E-04 | 1.094E-04 | 1.197E-04 | 1.037E-04 | 1.031E-04 | 1.072E-04 | 0.000E+00 |
| SE Nearest Res - Adult | Adult | 5.160E-04 | 5.168E-04 | 5.159E-04 | 5.162E-04 | 5.150E-04 | 5.377E-04 | 5.152E-04 | 0.000E+00 |
| SE Nearest Res - Child | Child | 5.178E-04 | 5.175E-04 | 5.145E-04 | 5.168E-04 | 5.144E-04 | 5.367E-04 | 5.144E-04 | 0.000E+00 |
| SE Nearest Res - Infant | Infant | 5.170E-04 | 5.172E-04 | 5.141E-04 | 5.166E-04 | 5.141E-04 | 5.310E-04 | 5.141E-04 | 0.000E+00 |
| SE Nearest Res - Teenager | Teenager | 5.168E-04 | 5.177E-04 | 5.153E-04 | 5.166E-04 | 5.150E-04 | 5.451E-04 | 5.150E-04 | 0.000E+00 |
| SE Visitor - Lifeguard 1.0 mi | Adult | 2.396E-04 | 2.399E-04 | 2.395E-04 | 2.397E-04 | 2.391E-04 | 2.491E-04 | 2.392E-04 | 0.000E+00 |
| W Near Garden - Adult | Adult | 2.419E-04 | 2.422E-04 | 2.418E-04 | 2.420E-04 | 2.415E-04 | 2.509E-04 | 2.416E-04 | 0.000E+00 |
| W Near Garden - Child | Child | 2.426E-04 | 2.425E-04 | 2.413E-04 | 2.422E-04 | 2.412E-04 | 2.505E-04 | 2.412E-04 | 0.000E+00 |
| W Near Garden - Teenager | Teenager | 2.422E-04 | 2.426E-04 | 2.416E-04 | 2.421E-04 | 2.415E-04 | 2.539E-04 | 2.415E-04 | 0.000E+00 |
| Maximum Dose by Organ: | | 5.178E-04 | 5.177E-04 | 5.159E-04 | 5.168E-04 | 5.150E-04 | 5.451E-04 | 5.152E-04 | 0.000E+00 |

Maximum Organ Dose (mRem): 5.451E-04

Maximum Total Body Dose (mRem): 5.159E-04

Maximum Individual NG Dose Summary

| Gas Receptor Location | Gamma (mRad) | Beta (mRad) | Total Body (mRem) | Skin (mRem) |
|--------------------------------|--------------|-------------|-------------------|-------------|
| NW Near Milk 4.25 mi | 4.462E-04 | 2.211E-04 | 4.248E-04 | 6.661E-04 |
| SE Nearest Res 1.52 mi 142 deg | 2.270E-03 | 1.125E-03 | 2.161E-03 | 3.388E-03 |
| SE Visitor @ 1 mi | 9.829E-04 | 4.870E-04 | 9.357E-04 | 1.467E-03 |
| W Near Gard 2.0 miles | 7.809E-04 | 3.870E-04 | 7.435E-04 | 1.166E-03 |
| Maximum NG Dose: | 2.270E-03 | 1.125E-03 | 2.161E-03 | 3.388E-03 |

Period: Ann, 2023

Site/Unit/Discharge Point: PSL1

Liquid Dose Summary - Note: All Doses in mRem

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-LI | Skin |
|---------------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| Liquid Receptor - Teenager | Teenager | 1.285E-03 | 2.822E-03 | 1.817E-03 | 1.300E-03 | 1.297E-03 | 2.856E-03 | 4.817E-03 | 0.000E+00 |
| Liquid Recptor - Child | Child | 1.249E-03 | 2.153E-03 | 1.729E-03 | 1.434E-03 | 5.629E-04 | 2.121E-03 | 2.831E-03 | 0.000E+00 |
| Maximum Dose by Organ: | | 1.285E-03 | 2.822E-03 | 1.817E-03 | 1.434E-03 | 1.297E-03 | 2.856E-03 | 4.817E-03 | 0.000E+00 |
| Maximum Organ Dose (mRem): | | 4.817E-03 | | | | | | | |
| Maximum Total Body Dose (mRem): | | 1.817E-03 | | | | | | | |

Period: Ann, 2023

Site/Unit/Discharge Point: PSL2

Liquid Dose Summary - Note: All Doses in mRem

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-Li | Skin |
|---------------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| Liquid Receptor - Teenager | Teenager | 1.285E-03 | 2.822E-03 | 1.817E-03 | 1.300E-03 | 1.297E-03 | 2.856E-03 | 4.817E-03 | 0.000E+00 |
| Liquid Recptor - Child | Child | 1.249E-03 | 2.153E-03 | 1.729E-03 | 1.434E-03 | 5.629E-04 | 2.121E-03 | 2.831E-03 | 0.000E+00 |
| Maximum Dose by Organ: | | 1.285E-03 | 2.822E-03 | 1.817E-03 | 1.434E-03 | 1.297E-03 | 2.856E-03 | 4.817E-03 | 0.000E+00 |
| Maximum Organ Dose (mRem): | | 4.817E-03 | | | | | | | |
| Maximum Total Body Dose (mRem): | | 1.817E-03 | | | | | | | |

Period: Ann, 2023

Site/Unit/Discharge Point: Site

Liquid Dose Summary - Note: All Doses in mRem

| Receptor | Agegroup | Bone | Liver | Total Body | Thyroid | Kidney | Lung | GI-Li | Skin |
|---------------------------------|----------|-----------|-----------|------------|-----------|-----------|-----------|-----------|-----------|
| Liquid Receptor - Teenager | Teenager | 2.571E-03 | 5.644E-03 | 3.633E-03 | 2.601E-03 | 2.595E-03 | 5.711E-03 | 9.634E-03 | 0.000E+00 |
| Liquid Recptor - Child | Child | 2.498E-03 | 4.306E-03 | 3.458E-03 | 2.868E-03 | 1.126E-03 | 4.242E-03 | 5.662E-03 | 0.000E+00 |
| Maximum Dose by Organ: | | 2.571E-03 | 5.644E-03 | 3.633E-03 | 2.868E-03 | 2.595E-03 | 5.711E-03 | 9.634E-03 | 0.000E+00 |
| Maximum Organ Dose (mRem): | | 9.634E-03 | | | | | | | |
| Maximum Total Body Dose (mRem): | | 3.633E-03 | | | | | | | |

3.1 Visitor Dose

Dose to a Member of the Public from Activities Inside the Site Boundary

Assessment of radiation dose from radioactive effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY assumes the VISITOR to be a Lifeguard at the Walton Rocks Beach recreation area. The visitor is assumed to be onsite for 6 hours per day for 312 days per year at a distance of 1 mile in the Southeast sector. The VISITOR received exposure from each of the two reactors on Site. Actual Met Data was used to calculate Visitor Dose for Calendar Year 2023, and the results are below.

| Noble Gas Dose | mrads |
|-----------------------|--------------|
| Gamma Air Dose | 1.88E-03 |
| Beta Air Dose | 9.29E-04 |

| Gas, Particulate, Iodine, Carbon Dose | mrem |
|--------------------------------------------------|-------------|
| Bone | 9.49E-05 |
| Liver | 9.50E-05 |
| Thyroid | 9.49E-05 |
| Kidney | 9.47E-05 |
| Lung | 9.86E-05 |
| GI-LLI | 9.47E-05 |
| Total Body | 9.48E-05 |

ENCLOSURE 2

OFFSITE DOES CALCULATION MANUAL (ODCM), Revision 55

(232 pages follow)

FOR INFORMATION ONLY

Before use, verify revision and change documentation (if applicable) with a controlled index or document.

DATE VERIFIED _____ INITIAL _____



ST. LUCIE PLANT

CHEMISTRY OPERATING PROCEDURE

SAFETY RELATED
REFERENCE USE

Procedure No.

C-200

Current Revision No.

55

Title:

OFFSITE DOSE CALCULATION MANUAL (ODCM)

Responsible Department: **CHEMISTRY**

REVISION SUMMARY:

NOTE

All changes to this procedure require an Emergency Preparedness Review.

Revision 55 - Incorporated PCR 2415157 to update guidance from Reg Guide 1.21, Rev 3.

Revision 54 - Incorporated PCR 2362195 to include additional Effluent Radiation Monitors into Table 4.3-9, Radioactive Gaseous Effluent Monitoring Instrumentation, revised ACTION 51 to the action statement as written previously in the Technical Specifications, Table 3.3-6 of Unit 1 Technical Specifications, Amendment 206, and revised ACTION 55 in Table 3.3-13 due to addition of the 3.b) Noble Gas Activity Monitor High Range for Unit 2 in C-200 Revision 50. (Author: N. Davidson)

Revision 53 - Incorporated PCR 2309983 to add clarification to Table 3.3-13 Action 51 for surveillance testing. Changed "Operative" to "In Service" in Table 4.3-9 notation ***. Added a contingency action for the CHF air sample pump. Deleted the word "VENT" after CHF in Table 4.11-2 Notation 8. (Author: K. Toebe)

AND

Incorporated PCR 2314153 to correct typo in Table 3.3-13. (Author: N. Davidson)

Revision 52 - Incorporated PCR 2278129 to define a tank release to prevent accounting for the same radioactivity multiple times when performing activities such as maintenance, and to remove the requirement for the SGBTF vent monitor to be operable when no releases are being made through that pathway. (Author: C. Crawford)

| Revision | Approved By | Approval Date | UNIT # | |
|----------|-------------|---------------|----------|-----------|
| 0 | C.M. Wethy | 04/27/82 | DATE | |
| | | | DOCT | PROCEDURE |
| | | | DOCN | C-200 |
| | | | SYS | |
| 55 | C. Santos | 05/11/23 | STATUS | COMPLETED |
| | | | REV | 55 |
| | | | # OF PGS | |

| | | |
|-------------------------|------------------------------------------------------------|-------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 2 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

| SECTION | INDEX | PAGE |
|---------------------------------------------------------------|-------|------|
| INTRODUCTION | | 9 |
| CONTROLS SECTION | | |
| <hr/> | | |
| <u>DEFINITIONS FOR CONTROLS SECTION</u> | | |
| 1.1 ACTION..... | | 12 |
| 1.4 CHANNEL CALIBRATION | | 12 |
| 1.5 CHANNEL CHECK | | 12 |
| 1.6 CHANNEL FUNCTIONAL TEST | | 12 |
| 1.10 DOSE EQUIVALENT I-131 | | 12 |
| 1.13 FREQUENCY NOTATION | | 13 |
| 1.17 MEMBER (S) OF THE PUBLIC..... | | 13 |
| 1.18 OFFSITE DOSE CALCULATION MANUAL | | 13 |
| 1.19 OPERABLE - OPERABILITY | | 13 |
| 1.20 OPERATIONAL MODE - MODE | | 13 |
| 1.24 PURGE - PURGING | | 14 |
| 1.25 RATED THERMAL POWER | | 14 |
| 1.27 REPORTABLE EVENT | | 14 |
| 1.30 SITE BOUNDARY | | 14 |
| 1.31 SOURCE CHECK | | 14 |
| 1.33 THERMAL POWER | | 14 |
| 1.34 UNPLANNED RELEASE..... | | 15 |
| 1.35 UNRESTRICTED AREA | | 15 |
| 1.39 VENTILATION EXHAUST TREATMENT SYSTEM | | 16 |
| 1.40 VENTING | | 16 |
| 1.41 WASTE GAS HOLDUP SYSTEM | | 16 |
| 3/4 CONTROLS AND SURVEILLANCE REQUIREMENTS..... | | 18 |
| 3/4.0 APPLICABILITY | | 18 |
| <u>INSTRUMENTATION</u> | | |
| RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION..... | | 19 |
| RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION | | 23 |

| | | |
|-------------------------|------------------------------------------------------------|-------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 3 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

INDEX
(continued)

SECTION PAGE

CONTROL AND SURVEILLANCE STATEMENTS FOR CONTROLS SECTION

3/4.11 RADIOACTIVE EFFLUENTS

| | | |
|----------|-----------------------------------------------------------------------------------------------------------------|----|
| 3/4.11.1 | LIQUID EFFLUENTS..... | 34 |
| | CONCENTRATION..... | 34 |
| | DOSE..... | 39 |
| | LIQUID RADWASTE TREATMENT SYSTEM | 40 |
| 3/4.11.2 | GASEOUS EFFLUENTS..... | 41 |
| | DOSE RATE | 41 |
| | DOSE - NOBLE GASES | 45 |
| | DOSE - IODINE-131, IODINE-133, TRITIUM AND RADIOACTIVE MATERIAL IN PARTICULATE FORM | 46 |
| | GASEOUS RADWASTE TREATMENT SYSTEM..... | 47 |
| 3/4.11.3 | (NOT USED) | |
| 3/4.11.4 | TOTAL DOSE..... | 49 |
| 3/4.11.5 | MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS ADMINISTRATIVE CONTROLS | 51 |
| 3/4.11.6 | ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT TO THE COMMISSION ADMINISTRATIVE CONTROLS | 52 |
| 3/4.12 | <u>RADIOLOGICAL ENVIRONMENTAL MONITORING</u> | |
| 3/4.12.1 | MONITORING PROGRAM..... | 56 |
| 3/4.12.2 | LAND USE CENSUS..... | 64 |
| 3/4.12.3 | INTERLABORATORY COMPARISON PROGRAM | 66 |
| 3/4.12.4 | ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT (AREOR) ADMINISTRATIVE CONTROLS | 67 |

| | | |
|-------------------------|------------------------------------------------------------|-------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 4 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

| INDEX (continued) | | PAGE |
|-----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|------|
| <u>SECTION</u> | | |
| BASES FOR CONTROLS SECTION | | |
| <hr/> | | |
| <u>3/4.11 RADIOACTIVE EFFLUENTS</u> | | |
| 3.3.3.9 | INSTRUMENTATION | 70 |
| 3/4.11.1 | LIQUID EFFLUENTS..... | 71 |
| 3/4.11.2 | GASEOUS EFFLUENTS..... | 73 |
| 3/4.11.3 | NOT USED | 76 |
| 3/4.11.4 | TOTAL DOSE..... | 76 |
| <u>3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING</u> | | |
| 3/4.12.1 | MONITORING PROGRAM..... | 78 |
| 3/4.12.2 | LAND USE CENSUS..... | 78 |
| 3/4.12.3 | INTERLABORATORY COMPARISON PROGRAM | 79 |
| <u>FIGURES</u> | | |
| FIGURE 1-1 | SITE AREA MAP & ENVIRONMENTAL SAMPLE LOCATIONS | 227 |
| FIGURE 1-2 | ENVIRONMENTAL SAMPLE LOCATIONS (10 MILES)..... | 228 |
| FIGURE 1-3 | RADIOLOGICAL ENVIRONMENTAL SAMPLING LOCATIONS IN SUPPORT OF THE GROUNDWATER PROTECTION INITIATIVE (NEI-07-07) | 228 |

| | | |
|-------------------------|------------------------------------------------------------|-------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 5 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

INDEX
(continued)

SECTION

PAGE

CONTROLS SECTION

LIST OF TABLES FOR CONTROLS SECTION

TABLE

| | | |
|--------|-------------------------------------------------------------------------------------------------|----|
| 1-1 | FREQUENCY NOTATION | 17 |
| 3.3-12 | RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION.. | 20 |
| 3.3-13 | RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION..... | 24 |
| 3.3-14 | RADIOACTIVE EFFLUENT MONITORING SETPOINT BASIS..... | 27 |
| 3.12-1 | RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM..... | 57 |
| 3.12-2 | REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES | 60 |
| 4.3-8 | RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS | 22 |
| 4.3-9 | RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS..... | 31 |
| 4.11-1 | RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM . | 34 |
| 4.11-2 | RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM..... | 41 |
| 4.12-1 | DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS LOWER LIMIT OF DETECTION (LLD)..... | 61 |

| | | |
|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|-------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 6 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |
| INDEX (continued) | | |
| <u>SECTION</u> | | <u>PAGE</u> |
| METHODOLOGY SECTION | | |
| <hr/> | | |
| Glossary for Methodology Section | | 80 |
| 1.0 | LIQUID RELEASES METHODOLOGY | 83 |
| 1.1 | Radioactive Liquid Effluent Model Assumptions | 83 |
| 1.2 | Determining the Fraction (F) of 10 CFR Part 20 Effluent Concentration Limits (ECL) for a Liquid Release Source | 84 |
| 1.3 | Determining Setpoints for Radioactive Liquid Effluent Monitors..... | 87 |
| 1.4 | Determining the Dose for Radioactive Liquid Releases | 91 |
| 1.5 | Projecting Dose for Radioactive Liquid Effluents | 94 |
| 2.0 | GASEOUS RELEASES METHODOLOGY | 95 |
| 2.1 | Gaseous Effluent Model Assumptions | 91 |
| 2.2 | Determining the Total Body and Skin Dose Rates for Noble Gas Releases and Establishing Setpoints for Effluent Monitors | 96 |
| 2.3 | Determining the Radioiodine and Particulate Dose Rate to Any Organ From Gaseous Releases..... | 110 |
| 2.3.1 | Inhalation | 112 |
| 2.3.2 | Ground Plane..... | 114 |
| 2.3.3 | Milk | 115 |
| 2.3.4 | Tritium..... | 117 |
| 2.3.5 | Total Dose Rate by Release Source..... | 119 |

| | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 7 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |
| <p style="text-align: center;">INDEX (continued)</p> <p style="text-align: center;"><u>SECTION</u> <u>PAGE</u></p> | | |
| METHODOLOGY SECTION | | |
| Glossary for Methodology Section (continued) | | |
| 2.0 | RADIOACTIVE RELEASES OF GASEOUS EFFLUENTS (continued) | |
| 2.4 | Determining the Gamma Air Dose for Radioactive Noble Gas Release Source(s) | 119 |
| 2.5 | Determining the Beta Air Dose for Radioactive Noble Gas Releases | 122 |
| 2.6 | Determining the Radioiodine and Particulate Dose to Any Age Group's Organ From Cumulative Releases..... | 124 |
| 2.6.1 | Inhalation | 126 |
| 2.6.2 | Ground Plane..... | 127 |
| 2.6.3 | Milk | 128 |
| 2.6.4 | Meat..... | 129 |
| 2.6.5 | Vegetation | 131 |
| 2.6.6 | Tritium (All pathways) | 132 |
| 2.6.7 | Total Organ Dose | 134 |
| 2.7 | Projecting Dose for Radioactive Gaseous Effluents..... | 135 |
| 3.0 | 40 CFR 190 DOSE EVALUATION | 135 |
| 4.0 | ANNUAL RADIOACTIVE EFFLUENT REPORT | 137 |

| | | |
|-------------------------|-------------------------------------------------------------------------------------------------|-------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 8 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |
| INDEX (continued) | | |
| <u>SECTION</u> | | <u>PAGE</u> |
| METHODOLOGY SECTION | | |
| <u>APPENDIXES</u> | | |
| APPENDIX A | ECL, Dose Factor and Historical Meteorological Tables | 151 |
| APPENDIX B | RADIOLOGICAL ENVIRONMENTAL SURVEILLANCE | 216 |
| APPENDIX B-1 | ST. LUCIE SUPPLEMENTAL REMP SAMPLING..... | 220 |
| APPENDIX B-2 | Radiological Environmental Sampling In Support of the GROUNDWATER PROTECTION INITIATIVE..... | 223 |
| APPENDIX C | Meteorological Dispersion Formulas | 228 |
| APPENDIX D | Description of the Interlaboratory Comparison Program | 229 |

| | | |
|----------------|----------------------------------------|----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 9 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

INTRODUCTION

The ODCM consists of the Controls Section followed by the Methodology Section.

The Controls Section provides the Control Statements, Limits, ACTION Statements, Surveillance Requirements and BASES for ensuring that Radioactive Liquid and Gaseous Effluents released to UNRESTRICTED AREAS and/or the SITE BOUNDARY will be maintained within the requirements of 10 CFR Part 20, 40 CFR Part 190, 10 CFR Part 72, 10 CFR 50.36.a and 10 CFR Part 50 Appendix-I radioactive release criteria. All Control Statements and most Administrative Control Statements in the ODCM are directly tied to and reference the Plant Technical Specification (TS) Administrative Section. The Administrative Control for Major Changes to Radioactive Liquid, Gaseous and Solid Treatment Systems is as per the guidance of NUREG-1301, April 1991, Supplement No. 1 to NRC Generic Letter 89-01. The numbering sequences of Control Statements also follow the guidance of NUREG-1301 as applicable, to minimize differences. Regulatory Guide 4.15, Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment, 6.3.1 and 6.3.2, provide the background for the need to maintain Quality Assurance programs for effluent releases and radiological environmental monitoring.

The Methodology Section uses the models suggested by NUREG-0133, November, 1978 and Regulatory Guide 1.109 to provide calculation methods and parameters for determining results in compliance with the Controls Section of the ODCM. Simplifying assumptions have been applied where applicable to provide a more workable document for implementing the Control requirements. Alternate calculation methods may be used from those presented as long as the overall methodology does not change or as long as most up-to-date revisions of the Regulatory Guide 1.109 dose conversion factors and environmental transfer factors are substituted for those currently included and used in this document.

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 10 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

RECORDS AND NOTIFICATIONS

All records of reviews performed for changes to the ODCM shall be maintained in accordance with RM-AA-100-1000, Processing Quality Assurance Records. All ORG approved changes to the ODCM, with required documentation of the changes per TS 6.14, shall be submitted to the NRC in the Annual Effluent Release Report. Procedures that directly implement, administer or supplement the requirements of the ODCM Controls and Surveillances are:

- CY-SL-102-0104, Processing Aerated Liquid Waste
- CY-SL-102-0105, Processing Gaseous Wastes
- 0-CPP-28.20, Met Tower Data Processing
- COP-05.04, Chemistry Department Surveillances and Parameters
- CY-SL-104-0112, Determination of Process Radiation Monitor Setpoints
- The Radiological Environmental Monitoring Program is performed by the State of Florida as per FPL Juno Nuclear Plant Services Corporate Environmental Procedure Number EV-SR-104-1001.
- The licensee also performs environmental monitoring per EV-AA-01, Fleet Groundwater Protection Program, in order to meet the objectives of the Nuclear Energy Institute's Industry Initiative (NEI 07-07).

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 11 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

CONTROLS
AND
SURVEILLANCE REQUIREMENTS

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 12 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

1.0 DEFINITIONS for CONTROLS SECTION OF ODCM

The defined terms of this section appear in capitalized type and are applicable throughout these Controls.

ACTION

- 1.1 ACTION shall be that part of a Control that prescribes remedial measures required under designated conditions.

CHANNEL CALIBRATION

- 1.4 CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated.

CHANNEL CHECK

- 1.5 CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST

- 1.6 A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated signal into the channel as close to the primary sensor as practicable to verify OPERABILITY including alarm and / or trip functions.

DOSE EQUIVALENT I-131

- 1.10 DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microCurie/gram) which alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134 and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be the thyroid dose conversion factors listed in Federal Guidance Report 11, Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion.

| | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 13 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |
| 1.0 DEFINITIONS for CONTROLS SECTION OF ODCM (continued) | | |
| <u>FREQUENCY NOTATION</u> | | |
| 1.13 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1. | | |
| <u>INDUSTRY INITIATIVE</u> | | |
| 1.14 Nuclear Energy Institute Initiative (NEI 07-07) on Managing Situations Involving Inadvertent Radiological Releases into Groundwater (The industry initiative has been adopted through FPL Nuclear Policy EV-AA-01, Fleet Groundwater Protection Program). | | |
| <u>MEMBER (S) OF THE PUBLIC</u> | | |
| 1.17 MEMBER OF THE PUBLIC means an individual in a controlled or unrestricted area. However, an individual is not a member of the public during any period in which the individual receives an occupational dose. | | |
| <u>OFFSITE DOSE CALCULATION MANUAL</u> | | |
| 1.18 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by TS section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by TS 6.9.1.7 and 6.9.1.8. | | |
| <u>OPERABLE - OPERABILITY</u> | | |
| 1.19 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s). | | |
| <u>OPERATIONAL MODE - MODE</u> | | |
| 1.20 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level and average reactor coolant temperature specified in Table 1.2 of the St. Lucie Plant TS. | | |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 14 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

1.0 DEFINITIONS for CONTROLS SECTION OF ODCM (continued)

PURGE - PURGING

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

RATED THERMAL POWER

- 1.25 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3020 MWt.

REPORTABLE EVENT

- 1.27 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 of 10 CFR Part 50.

SITE BOUNDARY

- 1.30 SITE BOUNDARY means that line beyond which the land or property is not owned, leased or otherwise controlled by the licensee.

SOURCE CHECK

- 1.31 A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a radioactive source.

TANK RELEASE

- 1.32 A tank that has been isolated from any ingress of radioactive materials, sampled, and permitted for release. Once the tank has been permitted and released, it may be purged from a non-radioactive source then re-released under the same permit. A new sample and permit shall be required if any Radioactive Materials have been introduced into the tank or waste stream.

THERMAL POWER

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 15 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

1.0 DEFINITIONS for CONTROLS SECTION OF ODCM (continued)

UNPLANNED RELEASE

1.34 **UNPLANNED RELEASE** is the unintended discharge of a volume of liquid or airborne radioactivity to the environment. The following guidance is presented to classify differences between unplanned releases and other releases that are not considered as an **UNPLANNED RELEASE**:

Is an **UNPLANNED RELEASE** if:

1. The wrong waste gas decay tank or liquid radwaste release tank is released off site.
2. Failure of process system to automatically divert a process stream to a radioactive treatment system upon radioactivity being present in the process at the detection level or at a certain level of activity, and the result is a discharge off site occurs.
3. Large losses from unexpected pipe or valve leaks where the resulting loss of radioactive material to off site such that a 10 CFR Part 50.72 or 10 CFR Part 50.73 report is required.
4. For Gas Decay Tank, if a Gas Decay Tank loses greater than 2 psig per 8 hours for 9 consecutive shifts, or 18 psig in 72 hours, AND the losses were determined to be to the Reactor Auxiliary Building Atmosphere, then declare the losses as an UNPLANNED RELEASE (reference CR 00-2039).

Is not an **UNPLANNED RELEASE** if:

1. It cannot be shown that the release went off site, i.e., gas went to another part of the system(s) that contained the loss.
2. Normal losses through the Plant Vent due to valve and pipe leakage and purging activities to make the system safe for maintenance activities.

UNRESTRICTED AREA

1.35 **UNRESTRICTED AREA** means an area, access to which is neither limited nor controlled by the licensee.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 16 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

1.0 DEFINITIONS for CONTROLS SECTION OF ODCM (continued)

VENTILATION EXHAUST TREATMENT SYSTEM

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

VENTING

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

WASTE GAS HOLDUP SYSTEM

- 1.41 A WASTE GAS HOLDUP SYSTEM shall be any system designed and installed to reduce radioactive gaseous effluents by collecting Reactor Coolant System offgases from the Reactor Coolant System and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 17 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 1.1
FREQUENCY NOTATION
(Page 1 of 1)

| <u>NOTATION</u> | <u>FREQUENCY</u> |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| S | At least once per 12 hours. |
| D | At least once per 24 hours. |
| W | At least once per 7 days. |
| 4/M* | At least 4 per month at intervals of no greater than 9 days and minimum of 48 per year. |
| M | At least once per 31 days. |
| Q | At least once per 92 days. |
| SA | At least once per 184 days. |
| R | At least once per 18 months. |
| S/U | Prior to each reactor startup. |
| N.A. | Not Applicable. |
| P** | Completed prior to each release |
| 1/DSC | Once per Dry Shielded Canister (DSC) loading and unloading operation when DSC is in the Cask Handling Facility (CHF) and DSC is loaded with Spent Fuel. |

* For Radioactive Effluent Sampling

** For Radioactive Batch Releases Only

| | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 18 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |
| <u>3/4 CONTROLS AND SURVEILLANCE REQUIREMENTS</u> | | |
| <u>3/4.0 APPLICABILITY</u> | | |
| CONTROLS | | |
| <p>3.0.1 Compliance with the Controls contained in the succeeding controls is required during the conditions specified therein; except that upon failure to meet the Control, the associated ACTION requirements shall be met.</p> <p>3.0.2 Noncompliance with a Control shall exist when the requirements of the Control and associated ACTION requirements are not met within the specified time intervals. If the Control is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.</p> | | |
| SURVEILLANCE REQUIREMENTS | | |
| <p>4.0.1 Surveillance Requirements shall be met during the conditions specified for individual Controls unless otherwise stated in an individual Surveillance Requirement.</p> <p>4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:</p> <p>a. A maximum allowable extension not to exceed 25% of the surveillance interval.</p> | | |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 19 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

CONTROLS

3.3.3.9 In accordance with St. Lucie Plant TS 6.8.4.f.1), the radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE with their Alarm/Trip Setpoints set to ensure that the limits of Control 3.11.1.1 are not exceeded. The Alarm/Trip Setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above control, immediately suspend the release of radioactive liquid effluents monitored by the affected channel or declare the channel inoperable or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12. Restore the inoperable instrumentation to OPERABLE status within 30 days and, if unsuccessful, explain in the next Annual Radioactive Effluent Release Report why this inoperability was not corrected in a timely manner.
- c. Report all deviations in the Annual Radioactive Effluent Release Report.

SURVEILLANCE REQUIREMENTS

4.3.3.9 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST at the frequencies shown in Table 4.3-8.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 20 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-12
RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION
 (Page 1 of 2)

| INSTRUMENT | MINIMUM CHANNELS OPERABLE | ACTION |
|--------------------------------------------------------------------------------|---------------------------|--------|
| 1. Radioactivity Monitors Providing Alarm and Automatic Termination of Release | | |
| a) Liquid Radwaste Effluent Line | 1 | 35 |
| b) Steam Generator Blowdown Effluent Line | 1/SG | 36, 37 |
| 2. Flow Rate Measurement Devices | | |
| a) Liquid Radwaste Effluent Line | N.A | 38 |
| b) Discharge Canal | N.A | 38 |
| c) Steam Generator Blowdown Effluent Lines | N.A | 38 |

SG - Denotes Steam Generator

ACTION STATEMENTS

ACTION 35 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases may continue provided that prior to initiating a release:

- a. At least two independent samples are analyzed in accordance with the Surveillance Requirement for concentration limit of Control 4.11.1.1.1.

AND

- b. At least two technically qualified members of the Facility Staff independently verify the release rate calculations and discharge line valving.

Otherwise, suspend release of radioactive effluents via this pathway.

ACTION 36 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided grab samples are analyzed for gross radioactivity (beta or gamma) at a limit of detection of at least 2.E-07 micro-Curie/ml:

- a. At least once per 8 hours⁽¹⁾ when the specific activity of the secondary coolant is greater than 0.01 micro-Curies/gram DOSE EQUIVALENT I-131

OR

- b. At least once per 24 hours⁽¹⁾ when the specific activity of the secondary coolant is less than or equal to 0.01 micro-Curies/gram DOSE EQUIVALENT I-131.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 21 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-12
RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

(Page 2 of 2)

ACTION STATEMENTS (continued)

ACTION 37 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, isotopic grab samples shall be obtained and analyzed at a Lower Limit of Detection for I-131, Co-58, Co-60, Cs-134, and Cs-137 to achieve detection sensitivity capable of detecting a primary-to-secondary leak rate of 5 gallons per day, provided that the Reactor Coolant System has sufficient activity present.

The applicable frequency shall be:

In MODES 1, 2, 3, 4

- a. At least once per day⁽¹⁾ for isotopic activity on the affected Steam Generator, provided that the Air Ejector Gas Activity Monitor is OPERABLE,

OR

- b. At least every 8 hours⁽¹⁾ for isotopic activity on the affected Steam Generator, if the Air Ejector Gas Activity Monitor is INOPERABLE.

This requirement is intended to meet EPRI PWR Primary-to-Secondary Leak Guidelines (TR-104788-R2) per reference PMAI 00-08-109.

ACTION 38 - Minimum system design flow of required running pumps shall be utilized for ECL calculations for discharge canal flow and maximum system design flow be utilized for ECL calculations for effluent line flow.

TABLE 3.3-12 Notation

- (1) - The initial sample shall be completed prior to the frequency interval specified. Subsequent samples (of the same INOPERABLE condition) may be performed per ODCM surveillance requirement 4.0.2 (a maximum allowable extension not to exceed 25% of the surveillance interval).

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 22 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.3-8
RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION
SURVEILLANCE REQUIREMENTS (4)
(Page 1 of 1)

| INSTRUMENT | CHANNEL CHECK | SOURCE CHECK | CHANNEL CALIBRATION | CHANNEL FUNCTIONAL TEST |
|--------------------------------------------------------------------------------|---------------|--------------|---------------------|-------------------------|
| 1. Radioactivity Monitors Providing Alarm and Automatic Termination of Release | | | | |
| a) Liquid Radwaste Effluent Line | D | P | R (2) | Q (1) |
| b) Steam Generator Blowdown Effluent Line | D | M | R (2) | Q (1) |
| 2. Flow Rate Measurement Devices | | | | |
| a) Liquid Radwaste Effluent Line | D (3) | N.A. | R | Q |
| b) Discharge Canal | D (3) | N.A. | R | Q |
| c) Steam Generator Blowdown Effluent Line | D (3) | N.A. | R | Q |

TABLE NOTATIONS

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exist:
 1. Instrument indicates measured levels above the alarm/trip setpoint or
 2. Circuit failure or
 3. Instrument indicates a downscale failure or
 4. Instrument controls not set in operate mode.
- (2) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards traceable to the National Institute of Standards & Technology (NIST) or using standards that have been calibrated against standards certified by the NIST. These standards should permit calibrating the system over its intended range of energy and rate capabilities that are typical of normal plant operation. For subsequent CHANNEL CALIBRATION, button sources that have been related to the initial calibration may be used.
- (3) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic or batch releases are made.
- (4) The requirements to perform the surveillances is not applicable, if Table 3.3-12 list the INSTRUMENT MINIMUM CHANNELS OPERABLE as not applicable (N.A.). (Reference CR 99-0361, PMAI 99-04-106).

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 23 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

INSTRUMENTATION

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

CONTROLS

3.3.3.10 In accordance with St. Lucie Plant TS 6.8.4.f.1), the radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3-13 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of Control 3.11.2.1 are not exceeded. The Alarm/Trip Setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

APPLICABILITY: As shown in Table 3.3-13

ACTION:

- a. With a radioactive gaseous effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above control, immediately suspend the release of radioactive gaseous effluents monitored by the affected channel or declare the channel inoperable or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels FUNCTIONAL, take the ACTION shown in Table 3.3-13. Restore the inoperable instrumentation to FUNCTIONAL status within 30 days and, if unsuccessful, explain in the next Annual Radioactive Effluent Release Report why this inoperability was not corrected in a timely manner.
- c. Report all deviations in the Annual Radioactive Effluent Release Report.

SURVEILLANCE REQUIREMENTS

4.3.3.10 Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated FUNCTIONAL by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST at the frequencies shown in Table 4.3-9.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 24 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-13
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
 (Page 1 of 4)

| INSTRUMENT | MINIMUM CHANNELS FUNCTIONAL | APPLICABILITY | ACTION | MEASUREMENT RANGE |
|--------------------------------------------------------------------------------------|-----------------------------|------------------|--------|-----------------------------------------------------------------------------------------------------------|
| 1. Waste Gas Holdup System | | | | |
| a) Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release | 1/ Rx | * | 45 | |
| 2. Condenser Evacuation System | | | | |
| a) Noble Gas Activity Monitor | 1/ Rx | ** | 47 | |
| | | Modes 1, 2, 3, 4 | 48 | |
| 3. Plant Vent System | | | | |
| a) Noble Gas Activity Monitor (Low Range) | 1/ Rx | *** | 47 | 10 ⁻⁷ – 10 ⁵ uCi/cc (Unit 1) 10 ⁻⁷ – 10 ⁻² uCi/cc (Unit 2) |
| b) Noble Gas Activity Monitor (High Range) | 1/ Rx | *** | 55 | 10 ⁻² – 10 ⁵ uCi/cc (Unit 2) |
| c) Iodine Sampler | 1/ Rx | * | 51 | |
| d) Particulate Sampler | 1/ Rx | * | 51 | |
| e) Flow Rate Monitor | N.A. (3) | * | 53 | |
| f) Sampler Flow Rate Monitor | 1/ Rx | * | 46 | |
| 4. Fuel Storage Area Ventilation System | | | | |
| a) Noble Gas Activity Monitor | 1/ Rx | * | 47,54 | 10 ⁻⁷ – 10 ⁵ uCi/cc (Unit 1) 10 ⁻⁷ – 10 ⁵ uCi/cc (Unit 2) |
| b) Iodine Sampler | 1/ Rx | * | 51 | |
| c) Particulate Sampler | 1/ Rx | * | 51,54 | 1-10 ⁶ cpm |
| d) Flow Rate Monitor | N.A. (3) | * | 53 | |
| e) Sampler Flow Rate Monitor | 1/ Rx | * | 46 | |

| | | |
|--------------------------------|-------------------------------------------------------------------|---------------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 25 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-13
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
 (Page 2 of 4)

| INSTRUMENT | MINIMUM CHANNELS FUNCTIONAL | APPLICABILITY | ACTION | MEASUREMENT RANGE |
|----------------------------------------------------|-----------------------------|---------------|--------|----------------------------|
| 5. Steam Generator Blowdown Building Vent | | | | |
| a) Noble Gas Activity Monitor (Low Range) | 1 | * | 47 | $10^{-7} - 10^{-2}$ uCi/cc |
| b) Iodine Sampler | 1 | * | 51 | |
| c) Particulate Sampler | 1 | * | 51 | |
| d) Flow Rate Monitor | N.A. (3) | * | 53 | |
| e) Sampler Flow Rate Monitor | 1 | * | 46 | |
| 6. Steam Safety Valve Discharge # | 1/Steam Header | Modes 1,2,3,4 | 51 | $10^{-1} - 10^3$ uCi/cc |
| 7. Atmospheric Steam Dump Valve Discharge # | 1/Steam Header | Modes 1,2,3,4 | 51 | $10^{-1} - 10^3$ uCi/cc |
| 8. ECCS Exhaust | 1/Train | Modes 1,2,3,4 | 51 | $10^{-7} - 10^5$ uCi/cc |

- * - At all times while making releases via this pathway
- ** - At all times when air ejector exhaust is not directed to plant vent.
- *** - At all times while making releases via this pathway or modes 1-4
- # - Only the Steam Safety Valve Discharge monitor is applicable to Unit 1, while both the Steam Safety Valve Discharge monitor and the Atmospheric Steam Dump Valve Discharge monitor are applicable to Unit 2 and are one monitor.

Rx - Denotes reactor

ACTION STATEMENTS

ACTION 45 - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, the contents of the tank(s) may be released to the environment provided that prior to initiating a release:

- a. At least two independent samples of the tank's contents are analyzed and
- b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup.

Otherwise, suspend release of radioactive effluents via this pathway.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 26 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-13
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
(Page 3 of 4)

ACTION STATEMENTS (continued)

ACTION 46 - With the number of channels FUNCTIONAL less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours.

ACTION 47 - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL, effluent releases via this pathway may continue provided:

a. If channel inoperability is due to loss of Control Room alarm annunciation ONLY.

- Channel checks are performed once per four hours⁽¹⁾ to verify normal indication and current assigned setpoints are NOT exceeded.

OR

- Grab samples are taken at least once per 8 hours ⁽¹⁾ and these samples are analyzed for isotopic activity within 24 hours.

b. If channel inoperability is due to loss of activity indication, Then

- Grab samples are taken at least once per 8 hours⁽¹⁾ and these samples are analyzed for isotopic activity within 24 hours.

OR

- The effluent pathway is continuously monitored using an effluent radiation monitor that meets all the requirements in Table 4.3-9 and Table 4.11-2.
 - If control room alarm annunciation is not available, Then channel checks are performed once per four hours⁽¹⁾ to verify normal indication and current assigned setpoints are NOT exceeded.

ACTION 48 - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, noble gas isotopic grab samples shall be obtained and analyzed at a Lower Limit of Detection for Ar-41, Kr-88, Xe-133, Xe-133m, and Xe-135 to achieve detection sensitivity capable of detecting a primary-to-secondary leak rate of 5 gallons per day, provided that the Reactor Coolant System has sufficient activity present.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 27 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-13
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
 (Page 4 of 4)

ACTION STATEMENTS (continued)

ACTION 48 (continued)

The applicable frequency shall be:

- a. At least once per 12 hours^{(1),(2)} for noble gas isotopic activity on the Air Ejector Exhaust provided that each affected Unit's Steam Generator Blowdown Monitor is FUNCTIONAL,

OR

- b. At least once per 8 hours^{(1),(2)} for noble gas isotopic activity on the Air Ejector Exhaust if either of the affected Unit's Steam Generator Blowdown Monitors is NONFUNCTIONAL.

This requirement is intended to meet EPRI PWR Primary-to-Secondary Leak Guidelines (TR-104788-R2), therefore grab samples shall be taken regardless of the Alignment of the Air Ejector Exhaust while in Modes 1, 2, 3, 4. (Reference PMAI 00-08-109.)

ACTION 51 - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, either restore the inoperable Channel(s) to FUNCTIONAL status within 72 hours or initiate the preplanned alternate method of monitoring the appropriate parameter(s).

ACTION 53 - Maximum system flows shall be utilized in the determination of the instantaneous release monitor alarm setpoint.

ACTION 54 - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, suspend all operations involving movement of recently irradiated fuel within the spent fuel storage pool or crane operations with loads over recently irradiated fuel assemblies in the spent fuel storage pool.

ACTIONS 55 - With the number of channels FUNCTIONAL less than required by the Minimum Channels FUNCTIONAL requirement, effluent releases via this pathway may continue provided the low range noble gas activity monitor remains within range. If any alert setpoint is reached, Then initiate grab sampling per Action 47 or initiate the preplanned alternate method of monitoring the appropriate parameter(s).

TABLE 3.3-13 NOTATION

- (1) - The initial sample shall be completed prior to the frequency interval specified. Subsequent samples (of the same NONFUNCTIONAL condition) may be performed per ODCM surveillance requirement 4.0.2 (a maximum allowable extension not to exceed 25 percent of the surveillance interval).
- (2) - If there is no steam flow to the air ejector nozzles while the Reactor is in Mode 4, Then the sample may be omitted, but the steam flow condition (status) to the air ejector shall be reverified once per 8 hours to initiate grab samples if steam flow to the air ejector nozzles is established.
- (3) - The flow rate monitors are not functional. Vent flow is based on design engineering documents and values in the UFSAR. EPIP-14 contains the correct flow values.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 28 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-14
RADIOACTIVE EFFLUENT MONITOR SETPOINT BASIS
 (Page 1 of 4)

| ODCM Effluent Gas Channels | CHANNEL ID | BASIS DOCUMENT | ALERT SETPOINT ^e | HIGH SETPOINT ^e | | | | | | | | | |
|-------------------------------------------------------------------------|----------------------------------|--------------------|-----------------------------|---------------------------------------------------------|-----------------------------------------------|------------------|--------------------|----------------------------------|-----------------------------------------------|------------------|--------------------|----------------------------------|-----------------------------------------------|
| 1PV LOW RANGE GAS | RSC26_1L | C-200 ^a | 5 x Bkg. ^q | Allotted % Of Site Limit ^q | | | | | | | | | |
| 1FHB LOW RANGE GAS | RSC26_4L | C-200 ^a | 5 x Bkg. ^q | Allotted % Of Site Limit ^q | | | | | | | | | |
| 2A PV PIG LOW RANGE GAS | 423 | C-200 ^a | 5 x Bkg. ^q | Allotted % Of Site Limit ^q For Plant Vent #2 | | | | | | | | | |
| 2B PV PIG LOW RANGE GAS | 433 | C-200 ^a | 5 x Bkg. | | | | | | | | | | |
| 2FHB LOW RANGE GAS | 413 | C-200 ^a | 5 x Bkg. | Allotted % Of Site Limit ^q | | | | | | | | | |
| SGBDB LOW RANGE GAS | 45-6 | C-200 ^a | 5 x Bkg. | Allotted % Of Site Limit ^q | | | | | | | | | |
| 1 CONDENSER AIR EJECTOR | 35 | C-200 | 2 x Bkg. ^b | 3 x Bkg. | | | | | | | | | |
| 2 CONDENSER AIR EJECTOR | 403 | C-200 | 2 x Bkg. ^b | 3 x Bkg. | | | | | | | | | |
| 1 BATCH GAS EFFLUENT | 42 | C-200 ^a | As Per CY-SL-102-0105 | As Per CY-SL-102-0105 ^{a,h} | | | | | | | | | |
| 2 BATCH GAS EFFLUENT | 203 | C-200 ^a | As Per CY-SL-102-0105 | As Per CY-SL-102-0105 ^{a,h} | | | | | | | | | |
| <u>2PV WRGM</u> Low Range Gas Mid Range Gas High Range Gas | <u>Chan</u> 621 622 623 | 624 ^P | C-200 ^a | 5 x Bkg. ^P uCi/sec | Allotted % Of Site Limit ^P uCi/sec | | | | | | | | |
| <u>2A ECCS WRGM</u> Low Range Gas Mid Range Gas High Range Gas | <u>Chan</u> 601 602 603 | | | | | 604 ^P | C-200 ^a | 0.75 x High ^P uCi/sec | Allotted % Of Site Limit ^P uCi/sec | | | | |
| <u>2B ECCS WRGM</u> Low Range Gas Mid Range Gas High Range Gas | <u>Chan</u> 611 612 613 | | | | | | | | | 614 ^P | C-200 ^a | 0.75 x High ^P uCi/sec | Allotted % Of Site Limit ^P uCi/sec |
| | | | | | | | | | | | | | |

| ODCM Related Particulate Channels | CHANNEL ID | BASIS DOCUMENT | ALERT SETPOINT ^e | HIGH SETPOINT ^e |
|-----------------------------------|------------|----------------|-----------------------------|----------------------------|
| 1FHB PARTICULATE | RSC26_4P | FUSAR | 5000 CPM | 10,000 CPM ^c |
| 2A PV PIG PARTICULATE | 421 | FUSAR | 5000 CPM | 10,000 CPM ^c |
| 2B PV PIG PARTICULATE | 431 | FUSAR | 5000 CPM | 10,000 CPM ^c |
| 2FHB PARTICULATE | 411 | FUSAR | 5000 CPM | 10,000 CPM ^c |
| SGBDB PARTICULATE | 45-4 | FUSAR | 5000 CPM | 10,000 CPM ^c |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 29 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-14
RADIOACTIVE EFFLUENT MONITOR SETPOINT BASIS
(Page 2 of 4)

| ODCM Related Iodine Channels | CHANNEL ID | BASIS DOCUMENT | ALERT SETPOINT ^e | HIGH SETPOINT ^e |
|------------------------------|------------|----------------|-----------------------------|----------------------------|
| 2A PV PIG IODINE | 422 | FUSAR | 5000 CPM | 10,000 CPM ^c |
| 2B PV PIG IODINE | 432 | FUSAR | 5000 CPM | 10,000 CPM ^c |
| 2FHB IODINE | 412 | FUSAR | 5000 CPM | 10,000 CPM ^c |
| SGBDB IODINE | 45-5 | FUSAR | 5000 CPM | 10,000 CPM ^c |

| ODCM Related Liquid Channels | CHANNEL ID | BASIS DOCUMENT | ALERT SETPOINT ^e | HIGH SETPOINT ^e |
|------------------------------|------------|----------------|-----------------------------|------------------------------------|
| 1A S/G BLOWDOWN | 44 | C-200 | 2 x Bkg. | 2.E-04 uCi/ml ^{f,m} |
| 1B S/G BLOWDOWN | 45 | C-200 | 2 x Bkg. | 2.E-04 uCi/ml ^{f,m} |
| 2A S/G BLOWDOWN | 121 | C-200 | 2 x Bkg. | 2.E-04 uCi/ml ^m |
| 2B S/G BLOWDOWN | 122 | C-200 | 2 x Bkg. | 2.E-04 uCi/ml ^m |
| 1 BATCH LIQUID EFFLUENT | R6627 | C-200 | As Per CY-SL-102-0104 | As Per CY-SL-102-0104 ⁿ |
| 2 BATCH LIQUID EFFLUENT | 301 | C-200 | As Per CY-SL-102-0104 | As Per CY-SL-102-0104 ⁿ |

Monitor channels not listed are covered per CY-SL-104-0112, Determination of Process Radiation Monitor Setpoints

TABLE NOTATIONS

- a - ODCM Control 3.11.2.1a
- b - ODCM Table 4.11-1 Note (7)
- c - ODCM Control 3.11.2.1.b
- e - Setpoints may be rounded for analog and digital display input limitations.
- f - The channel setpoint to be in cpm equivalent to this activity
- g - per ODCM Methodology Step 2.2.2
- h - Batch Gaseous Release Rate and Maximum activity limits shall be used such that Plant Vent (PV) Release HIGH setpoints should not be exceeded.
- i, j, k, and l not used in notation for clarity

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 30 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-14
RADIOACTIVE EFFLUENT MONITOR SETPOINT BASIS
(Page 3 of 4)

TABLE NOTATIONS (continued)

- m - Continuous Liquid setpoint methodology per ODCM 1.3.2
- n - Batch liquid setpoint methodology per ODCM 1.3.1
- o - Note "oscar" is not used in this table notation
- p - The individual Channel 621, 622 and 623 (Plant Vent No. 2)
 Channel 601, 602 and 603 (ECCS 2A)
 and Channel 611, 612 and 613 (ECCS 2B)

Data Base Alert and High Alarm Setpoint Items do not provide activation of a Control Room Alarm. Only the Skid's Effluent Channel Setpoint provides an alarm function. After the first Alert and High Effluent Channel Alarms are received they will stay locked in if the release is increasing to higher activity levels. Transfer of Skid internal control to Effluent Channel input from the Mid or High Range Gas Channels will not reset an alarm, nor provide additional alarms. The Effluent Channel on the respective Skid has to be reset to new Setpoints by I&C. References to "Alert Alarm" and "High Alarm" settings for the Low Mid and High Channels are for display information only. This is why Table 3.3-14 only list Channel 624, 604 and 614 as the Channel ID for Alarm Setpoints. These are the respective Skid's Alarm Channel.

Channel ID number 604 and 614 are the uCi/sec indication and ALERT/HIGH Alarm channels for ECCS 2A and ECCS 2B respectively. The ECCS exhaust pathways each have a single fan. Their Skid's Monitor Item #059 will be set per the measured ft³/minute exhaust rate. Their Skid's Monitor Item #060 (Accident Flow rate) will be set to zero since there is only one flow rate possible for these ECCS pathways. The uCi/sec value indicated on ECCS skids should be valid regardless of Normal or Accident conditions.

The Channel ID number 624 (generically called the Plant Vent 2 Skid's Channel 4) is the uCi/sec and Control Room active ALERT/HIGH Alarm that is Common (shared by) to the Low (621), Mid (622), and High (623) Range Gas Channels. The Plant Vent 2's skid Monitor Item #059 will be set for the maximum ft³/minute flow rate that could occur under all circumstances. The Plant Vent 2 Channel 624's actual uCi/sec is dependent what is set in Monitor Item #059 and Monitor Item #060 as follows:

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 31 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.3-14
RADIOACTIVE EFFLUENT MONITOR SETPOINT BASIS
(Page 4 of 4)

TABLE NOTATIONS (continued)

p - (continued)

The NORMAL value for the Common Channel 624 uCi/sec indication and ALERT/High Alarms should be based on the equivalent uCi/sec of the 5 x Bkg (use CY-SL-104-0112, Determination of Process Radiation Monitor Setpoints) uCi/cc of the Low Range Channel #621 and RIM 26-90 Monitor Item #059 (the MAXIMUM process ft³/minute flow rate that could occur in the Unit 2 Plant Vent.

The ACCIDENT value for the Common Channel 624's uCi/sec is based on the Skid switching (at a preset activity value) input from the Low Range Channel to calculate / display a uCi/sec value based on receiving activity uCi/cc input from either the Mid Range Channel 622 (OR from the High Range Channel 623) and RIM 26-90 Monitor Item #060 6,600 ft³/minute (use CY-SL-104-0112, Determination of Process Radiation Monitor Setpoints) flow rate that is expected during a LOCA Safety Injection sequence.

During an ACCIDENT you have to access the running status of 2-HVE-6A, 2-HVE-6B, 2-HVE-7A, 2-HVE-7B, 2-HVE-8A, 2-HVE-8B, 2-HVE-10A and 2-HVE-10B to determine actual Plant Vent exhaust flow rate ft³/minute. This is the flow rate that should be inserted into Plant Vent #2 Skid's Monitor Item #060 with new Setpoints for Alert and High Alarms in units of uCi/sec calculated by using the actual Plant Vent exhaust flow during the Accident. If fan operating status changes, the Effluent Channel 624 uCi/sec indication and existing Alert and High Alarm Setpoints will not be valid for a new flow rate. This is the reason that EPIP-14 does not utilize Channel 624 indication for calculating off-site dose.

q - During an outage, the Low Range gas activity ALERT Alarm Setpoint may be set to slightly above outage anticipated activity levels, but shall always be set to a value less than the High Alarm Setpoint. Examples of outage activities are initiating a Containment Main Purge and venting the S/G primary side bowls.

FUSAR - Channel listed FUSAR, but not required by ODCM Control 3.3.10 Table 3.3-13. The setpoints are used to provide alarm well before exceeding ODCM Control 3.11.2.1.b Site Dose Rate Limit. The inoperability of a FUSAR channel above does not involve an ACTION statement unless TS (Technical Specification) is noted.

2 x Bkg., 3 x Bkg., 5 x Bkg. etc., denotes the number of times the normal channel reading is the appropriate Alarm Setting. These type of setpoints should be periodically evaluated to insure alarm sensitivity is maintained as per CY-SL-104-0112, Determination of Process Radiation Monitor Setpoints.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 32 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.3-9
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
SURVEILLANCE REQUIREMENTS (4)

(Page 1 of 2)

| INSTRUMENT | CHANNEL CHECK | SOURCE CHECK | CHANNEL CALIBRATION | CHANNEL FUNCTIONAL TEST | Modes in which surveillance required |
|--------------------------------------------------------------------------------------|---------------|--------------|---------------------|-------------------------|--------------------------------------|
| 1. Waste Gas Holdup System | | | | | |
| a) Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release | P | P | R (3) | Q (1) | * |
| 2. Condenser Evacuation System | | | | | |
| a) Noble Gas Activity Monitor | D | M | R (3) | Q (2) | ** |
| 3. Plant Vent System | | | | | |
| a) Noble Gas Activity Monitor | D | M | R (3) | Q (2) | * |
| b) Iodine Sampler | W | N.A. | N.A. | N.A. | * |
| c) Particulate Sampler | W | N.A. | N.A. | N.A. | * |
| e) Sampler Flow Rate | D | N.A. | R | N.A. | * |
| 4. Fuel Storage Area Ventilation System | | | | | |
| a) Noble Gas Activity Monitor | D | M | R (3) | Q (2) | * |
| b) Iodine Sampler | W | N.A. | N.A. | N.A. | * |
| c) Particulate Sampler | W | N.A. | N.A. | N.A. | * |
| e) Sampler Flow Rate Monitor | D | N.A. | R | N.A. | * |
| 5. Steam Generator Blowdown Building Vent | | | | | |
| a) Noble Gas Activity Monitor | D | M | R (3) | Q (2) | * |
| b) Iodine Sampler | W | N.A. | N.A. | N.A. | * |
| c) Particulate Sampler | W | N.A. | N.A. | N.A. | * |
| e) Sampler Flow Rate Monitor | D | N.A. | R | N.A. | * |
| 6. Cask Handling Facility (CHF) | | | | | |
| a) Sampler Flow Rate Monitor | D | N.A. | Annual | N.A. | *** |
| 7. Steam Safety Valve Discharge # | | | | | |
| a) Noble Gas Activity Monitor | S | N.A. | R (3) | M | 1, 2, 3, 4 |
| 8. Atmospheric Steam Dump Valve Discharge # | | | | | |
| a) Noble Gas Activity Monitor | S | N.A. | R (3) | M | 1, 2, 3, 4 |
| 9. ECCS Exhaust | | | | | |
| a) Noble Gas Activity Monitor | S | N.A. | R (3) | M | 1, 2, 3, 4 |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 33 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.3-9
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
SURVEILLANCE REQUIREMENTS (4)

(Page 2 of 2)

TABLE NOTATIONS

- * - At all times when making releases via this pathway.
 - ** - At all times when air ejector exhaust is not directed to plant vent.
 - *** - At all times when Cask Handling Facility (CHF) ventilation is in service.
 - # - Only the Steam Safety Valve Discharge monitor is applicable to Unit 1, while both the Steam Safety Valve Discharge monitor and the Atmospheric Steam Dump Valve Discharge monitor are applicable to Unit 2 and are one monitor.
- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate automatic isolation of this pathway and control room alarm annunciation occurs if any of the following conditions exist:
 1. Instrument indicates measured levels above the alarm/trip setpoint or
 2. Circuit failure or
 3. Instrument indicates a downscale failure or
 4. Instrument controls not set in operate mode.
 - (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exist:
 1. Instrument indicates measured levels above the alarm/trip setpoint or
 2. Circuit failure or
 3. Instrument indicates a downscale failure or
 4. Instrument controls not set in operate mode.
 - (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards traceable to the National Institute of Standards & Technology (NIST) or using standards that have been calibrated against standards certified by the NIST. These standards should permit calibrating the system over its intended range of energy and rate capabilities that are typical of normal plant operation. For subsequent CHANNEL CALIBRATION, button sources that have been related to the initial calibration may be used.
 - (4) The requirements to perform the surveillances is not applicable, if Table 3.3-13 list the INSTRUMENT MINIMUM CHANNELS FUNCTIONAL as not applicable (N.A.). (Reference CR 99-0361, PMAI 99-04-106).

| | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 34 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |
| <u>3/4.11 RADIOACTIVE EFFLUENTS</u> <u>3/4.11.1 LIQUID EFFLUENTS</u> <u>CONCENTRATION</u> <u>CONTROLS</u> | | |
| <p>3.11.1.1 In accordance with the St. Lucie Plant TS 6.8.4.f.2) and 3), the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see TS Figure 5.1-1) shall be limited to ten times the concentrations specified in 10 CFR Part 20.1001-20.2401, Appendix B, Table 2, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2.E-04 micro-Curie/ml total activity.</p> <p><u>APPLICABILITY:</u> At all times.</p> <p><u>ACTION:</u></p> <p>a. With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, immediately restore the concentration to within the above limits.</p> <p><u>SURVEILLANCE REQUIREMENTS</u></p> | | |
| <p>4.11.1.1.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-1.</p> <p>4.11.1.1.2 The results of the radioactivity analyses shall be used in accordance with the methodology and parameters in the ODCM to assure that the concentrations at the point of release are maintained within the limits of Control 3.11.1.1.</p> <p>4.11.1.1.3 Post-release analyses of samples composited from batch releases shall be performed in accordance with Table 4.11-1 and results of the previous post-release analyses shall be used with the calculation methods in the ODCM to assure that the concentrations at the point of release were maintained within the limits of Control 3.11.1.1.</p> | | |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 35 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.11-1
RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM
 (Page 1 of 4)

| Liquid Release Type | Sampling Frequency | Minimum Analysis Frequency | Type of Activity Analysis | Lower Limit of Detection LLD (1) ($\mu\text{Ci/ml}$) |
|---------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------|------------------------------------------------|--------------------------------------------------------|
| A. Batch Waste Release Tanks (2) | P Each Batch | Each Batch | P.G.E. (3) | 5.E-07 |
| | | | I-131 | 1.E-06 |
| | P One Batch/M | M | Dissolved and Entrained Gases (Gamma Emitters) | 1.E-05 |
| | P Each Batch | M Composite (4) | H-3 | 1.E-05 |
| | | | Gross Alpha | 1.E-07 |
| | P Each Batch | Q Composite (4) | Sr-89, Sr-90 | 5.E-08 |
| | | | C-14, Fe-55, Ni-63 | 1.E-06 |
| | | | P.G.E.(3) | 5.E-07 |
| B. Continuous Releases (5, 6) | Daily | 4/M Composite | I-131 | 1.E-06 |
| | Daily Grab Sample | 4/M Composite | Dissolved and Entrained Gases (Gamma Emitters) | 1.E-05 |
| | Daily | M Composite | H-3 | 1.E-05 |
| | | | Gross Alpha | 1.E-07 |
| | Daily | Q Composite | Sr-89, Sr-90 | 5.E-08 |
| | | | C-14, Fe-55, Ni-63 | 1.E-06 |
| | | | P.G.E. (3) | 5.E-07 |
| | | | I-131 | 1.E-06 |
| C. East/West Settling Basins (7) | W Grab Sample | W | P.G.E. (3) | 5.E-07 |
| | | | I-131 | 1.E-06 |
| D. Settling Basin as a Batch Release Pathway. (9) (Reference CR 99-1165 PMAI 99-08-084 PMAI-01-04-115 (12) CR 2010-296. (13) AR 01967018 | P Each Batch (8) | Each Batch | P.G.E. (3) | 5.E-07 |
| | | | I-131 | 1.E-06 |
| | | | Dissolved and Entrained Gases (Gamma Emitters) | 1.E-05 |
| | | | H-3 | 1.E-05 |
| | | | Gross Alpha | 1.E-07 |
| | | | Sr-89, Sr-90 | 5.E-08 |
| | | | C-14, Fe-55, Ni-63 | 1.E-06 |
| | | | H-3 | 1E-05 |
| E. Groundwater Dewatering Batch Releases (10) | W (11) | W (11) | P.G.E. (3) | 5.E-07 |
| | | | H-3 | 1E-05 |
| | P Each Batch (8) | Each Batch | P.G.E. (3) | 5.E-07 |
| | | | Gross Alpha | 1.E-07 |
| | | | Sr-89, Sr-90 | 5.E-08 |
| | | | C-14, Fe-55, Ni-63 | 1.E-06 |
| | | | H-3 | 1E-05 |
| | | | P.G.E. (3) | 5.E-07 |

P.G.E. - Denotes Principal Gamma Emitter

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 36 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.11-1
RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM
 (Page 2 of 4)

TABLE NOTATIONS

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

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

$$LLD = \frac{4.66 S_b}{E \cdot V \cdot 2.22E + 06 \cdot Y \cdot \exp(-\lambda \cdot \Delta T)}$$

Where:

- LLD = the a priori lower limit of detection (micro-Curie per unit mass or volume),
- S_b = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (counts per minute),
- E = the counting efficiency (counts per disintegration),
- V = the sample size (units of mass or volume),
- $2.22E+06$ = the number of disintegrations per minute per micro-Curie.,
- Y = the fractional radiochemical yield, when applicable,
- λ = the radioactive decay constant for the particular radionuclide (sec^{-1}) and
- ΔT = the elapsed time between the midpoint of sample collection and the time of counting (sec).

Typical values of E, V, Y and ΔT should be used in the calculation.

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 37 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.11-1
RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

(Page 3 of 4)

TABLE NOTATIONS

(continued)

- (2) A batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated and then thoroughly mixed by a method described in the ODCM to assure representative sampling.
- (3) The principal gamma emitters for which the LLD control applies include the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137 and Ce-141 and Ce-144. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radioactive Effluent Release Report pursuant to Control 3.11.2.6 in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.
- (4) A composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released.
- (5) A continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.
- (6) If Component Cooling Water activity is $> 1.E-5 \mu\text{Ci/ml}$, perform a weekly gross activity on the Intake Cooling Water System outlet to ensure the activity level is less than or equal to $2.E-07 \mu\text{Ci/ml}$ LLD limit. If ICW is $> 2.E-07 \mu\text{Ci/ml}$, perform analysis in accordance with a Plant Continuous Release on this Table.
- (7) Grab samples to be taken when there is confirmed primary to secondary system leakage indicated by the air ejector monitor indicating greater than or equal to 2x background.
- (8) At least two independent samples are analyzed in accordance with the surveillance requirement for concentration limit of control 4.11.1.1.1 and at least two technically qualified members of the facility staff independently verify the release rate calculations.
- (9) The settling basin(s) may receive low level activity per the guidance of CY-SL-102-0104, therefore these samples shall be taken regardless of the absence of a primary-to-secondary leak (note (7) on liquid release type [C] settling basin does not apply to liquid release type [D] settling basin as a batch release pathway). The South Basin (pond) is a permitted outfall (per FDEP Permit FL002208) to the intake canal. An authorized "bypass" is required to pump directly from the East or West Basins.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 38 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.11-1
RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM
(Page 4 of 4)

TABLE NOTATIONS
(continued)

- (10) Applies to groundwater dewatering discharges from locations outside the Plant Protected Area where radiological contamination is not expected at significant levels. This expectation may be a judgment based on local and peripheral samples that indicate radiological contaminant levels below the LLD from sources in the dewatering pump's zone of influence. These samples may include dewatering pump well samples (taken by small-volume sample pumps), upgradient groundwater samples, and upgradient samples taken from surface waters (e.g., IWWV percolation basins) within the zone of influence. The sampling protocol for these releases shall be precautionary in nature. A conservative value shall be established in the discharge permit for the effluent activity; however, the permit shall be reconciled with actual activity concentrations ascertained from sample analysis of the actual effluent.

- (11) Each outfall shall be sampled at some point in the discharge header at the frequency described herein. Any outfall that includes a well (or well point) that has not yet achieved its steady state flow rate (indicating that it has not yet reached its steady state zone of influence) shall be sampled weekly. After the wells of an outfall reaches steady state, the sampling and analysis frequency may be extended to monthly.

- (12) CR 2010-296; Radiological Impact Evaluation of Effluent Releases from Catch Basins to the East Settling Pond (Dec. 2009). It was determined that potential tritium releases via evaporation from the East Settling Pond alone (i.e. gaseous releases) represents <1.0% of the total activity released via all gaseous release points and therefore, does not qualify as significant release point.

- (13) Under emergency conditions, the Shift Manager and Chemistry Manager may waive the requirement to analyze the gamma spectroscopy, tritium, and alpha samples prior to starting the release. Analyses must be completed within a 24 hour period following the initiation of a discharge. An "emergency" is a condition where plant flooding, personnel injury, or damage to plant equipment are likely based on plant conditions. AR 01967018, Site Evaluation for Expediting South Pond Releases (May 2014), provides site documentation and justification that the effectiveness of the radioactive effluent control program is not reduced by the change.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 39 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

DOSE

CONTROLS

3.11.1.2 In accordance with St. Lucie Plant TS 6.8.4.f.4) and 6.8.4.f.5), the dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each unit, to UNRESTRICTED AREAS (see TS Figure 5.1-1) shall be limited:

- a. During any calendar quarter to less than or equal to 1.5 mrem to the whole body and to less than or equal to 5 mrem to any organ and
- b. During any calendar year to less than or equal to 3 mrem to the whole body and to less than or equal to 10 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Plant TS 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

SURVEILLANCE REQUIREMENTS

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 40 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

LIQUID RADWASTE TREATMENT SYSTEM

CONTROLS

3.11.1.3 In accordance with St. Lucie Plant TS 6.8.4.f.6), the Liquid Radwaste Treatment System shall be OPERABLE and appropriate portions of the system shall be used to reduce releases of radioactivity when the projected doses due to the liquid effluent, from each unit, to UNRESTRICTED AREAS (see TS Figure 5.1-1) would exceed 0.06 mrem to the whole body or 0.2 mrem to any organ in a 31-day period.

APPLICABILITY: At all times.

ACTION:

- a. With radioactive liquid waste being discharged without treatment and in excess of the above limits and any portion of the Liquid Radwaste Treatment System not in operation, prepare and submit to the Commission within 30 days, pursuant to Plant TS 6.9.2, a Special Report that includes the following information:
 1. Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems and the reason for the inoperability,
 2. Action(s) taken to restore the inoperable equipment to OPERABLE status and
 3. Summary description of action(s) taken to prevent a recurrence.

SURVEILLANCE REQUIREMENTS

- 4.11.1.3.1 Doses due to liquid releases from each unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when Liquid Radwaste Treatment Systems are not being fully utilized.
- 4.11.1.3.2 The installed Liquid Radwaste Treatment System shall be demonstrated OPERABLE by operating the liquid radwaste treatment system equipment for at least 30 minutes at least once per 92 days unless the liquid radwaste system has been utilized to process radioactive liquid effluents during the previous 92 days.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 41 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

3/4.11.2 GASEOUS EFFLUENTS

DOSE RATE

CONTROLS

3.11.2.1 In accordance with St. Lucie Plant TS 6.8.4.f.3) and 7), the dose rate resulting from radioactive materials released in gaseous effluents to areas at or beyond the SITE BOUNDARY (see TS Figure 5.1-1) shall be limited to the following:

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

APPLICABILITY: At all times.

ACTION:

- a. With the dose rate(s) exceeding the above limits, immediately restore the release rate to within the above limit(s).

SURVEILLANCE REQUIREMENTS

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

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 42 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.11-2
RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM
 (Page 1 of 3)

| Gaseous Release Type | Sampling Frequency | Minimum Analysis Frequency | Type of Activity Analysis | Lower Limit of Detection LLD (1) (μCi/ml) |
|---------------------------------------------------|------------------------------------|-----------------------------------------|------------------------------------|-------------------------------------------|
| 1. Waste Gas Storage Tank | P Each Tank Grab Sample | P Each Tank | Noble Gas P.G.E. (2) | 1.E-04 |
| 2. Containment Purge (9) | P Each Purge (6) Grab Sample | P Each Purge (6) (7) | Noble Gas P.G.E. (2) | 1.E-04 |
| | | | H-3 | 1.E-06 |
| 3. Vents:(9) | 4/M Grab Sample (8) | 4/M (7) | Noble Gas P.G.E. (2) | 1.E-04 |
| a. Plant | | | H-3 | 1.E-06 |
| b. Fuel Bldg (5) | | | | |
| c. S/G Blowdown Bldg. | | | | |
| 4. All Release Types as listed in 3. above (9) | Continuous (3) (8) | 4/M Charcoal Sample (4) | I-131 | 1.E-12 |
| | | 4/M Particulate Sample (4) | P.G.E. | 1.E-11 |
| | | 4/M Particulate Sample | Gross Alpha | 1.E-11 |
| | | Q Composite Particulate Sample | Sr-89, Sr-90 | 1.E-11 |
| | | Noble Gas Monitor | Noble Gases Gross Beta or Gamma | 1.E-06 |
| 5. Cask Handling Facility (8) | W Grab Sample (8) | W | Noble Gas P.G.E. (2) | 1. E-04 |
| | | | H-3 | 1.E-06 |
| | | W Charcoal Sample | I-131 | 1.E-12 |
| | | W Particulate Sample | P.G.E. | 1.E-11 |
| | Continuous (8) | W Particulate Sample | Gross Alpha | 1.E-11 |
| | | Q Composite Particulate Sample | Sr-89, Sr-90 | 1.E-11 |

P.G.E. - Denotes Principal Gamma Emitter

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 43 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.11-2
RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM
(Page 2 of 3)

TABLE NOTATIONS

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

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

$$LLD = \frac{4.66 S_b}{E \cdot V \cdot 2.22E + 06 \cdot Y \cdot \exp(-\lambda \cdot \Delta T)}$$

Where:

- LLD = the a priori lower limit of detection (micro-Curie per unit mass or volume),
- LLD = the a priori lower limit of detection (micro-Curie per unit mass or volume),
- S_b = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (counts per minute),
- E = the counting efficiency (counts per disintegration),
- V = the sample size (units of mass or volume),
- $2.22E+06$ = the number of disintegrations per minute per micro-Curie.,
- Y = the fractional radiochemical yield, when applicable,
- λ = the radioactive decay constant for the particular radionuclide (sec^{-1}) and
- ΔT = the elapsed time between the midpoint of sample collection and the time of counting (sec).

Typical values of E , V , Y and ΔT should be used in the calculation.

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 44 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.11-2
RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

(Page 3 of 3)

TABLE NOTATIONS

(continued)

- (2) The principal gamma emitters for which the LLD control applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135 and Xe-138 in noble gas releases and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141 and Ce-144 in iodine and particulate releases. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radioactive Effluent Release Report pursuant to Control 3.11.2.6 in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.
- (3) The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Controls 3.11.2.1, 3.11.2.2 and 3.11.2.3.
- (4) Samples shall be changed at least four times per month and analyses shall be completed within 48 hours after changing or after removal from sampler. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does not apply if: (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the reactor coolant has not increased more than a factor of 3; and (2) the noble gas monitor shows that effluent activity has not increased by more than a factor of 3.
- (5) Tritium grab samples shall be taken at least 4/M from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.
- (6) Sampling and analysis shall also be performed following shutdown, startup or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within 1 hour unless (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 3; and (2) the noble gas activity monitor shows that effluent activity has not increased by more than a factor of 3.
- (7) Tritium analysis may be delayed for up to 14 days if the LLD is still attainable at the new counting time.
- (8) Frequencies applicable only when the ventilation system is operating. In the event that the primary effluent sampling system fails, alternate sampling **SHALL** be initiated and incorporate all parameters listed in Table 4.11-2 Section 5.
- (9) During outages, the affected unit's containment equipment hatch is a potential effluent pathway. Monitoring of the open containment equipment hatch is performed as per procedural guidance. Any calculated release quantity will be reported in the annual report.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 45 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

DOSE - NOBLE GASES

CONTROLS

3.11.2.2 In accordance with St. Lucie Plant TS 6.8.4.f.5) and 8), the air dose due to noble gases released in gaseous effluents, from each unit, to areas at and beyond the SITE BOUNDARY (see TS Figure 5.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 5 mrad for gamma radiation and less than or equal to 10 mrad for beta radiation and
- b. During any calendar year: Less than or equal to 10 mrad for gamma radiation and less than or equal to 20 mrad for beta radiation.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Plant TS 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to assure that subsequent releases will be in compliance with the above limits.

SURVEILLANCE REQUIREMENTS

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 46 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

DOSE - IODINE-131, IODINE-133, TRITIUM AND RADIOACTIVE MATERIAL IN PARTICULATE FORM

CONTROLS

3.11.2.3 In accordance with St. Lucie Plant TS 6.8.4.f.5) and 9), the dose to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each unit, to areas at and beyond the SITE BOUNDARY (see TS Figure 5.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 7.5 mremS to any organ and,
- b. During any calendar year: Less than or equal to 15 mremS to any organ.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of Iodine-131, Iodine-133, tritium and radionuclides in particulate form with half-lives greater than 8 days, in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Plant TS 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to assure that subsequent releases will be in compliance with the above limits.

SURVEILLANCE REQUIREMENTS

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

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 47 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

RADIOACTIVE EFFLUENTS

GASEOUS RADWASTE TREATMENT SYSTEM

CONTROLS

3.11.2.4 In accordance with St. Lucie Plant TS 6.8.4.f.6), the VENTILATION EXHAUST Treatment System and the WASTE GAS HOLDUP SYSTEM shall be OPERABLE and appropriate portions of the system shall be used to reduce releases of radioactivity when the projected doses in 31 days due to gaseous effluent releases, from each unit, to areas at and beyond the SITE BOUNDARY (see TS Figure 5.1-1) would exceed:

- a. 0.2 mrad to air from gamma radiation or
- b. 0.4 mrad to air from beta radiation or
- c. 0.3 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

- a. With radioactive gaseous waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, pursuant to Plant TS 6.9.2, a Special Report that includes the following information:
 1. Identification of any inoperable equipment or subsystems and the reason for the inoperability,
 2. Action(s) taken to restore the inoperable equipment to OPERABLE status and
 3. Summary description of action(s) taken to prevent a recurrence.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 48 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

GASEOUS RADWASTE TREATMENT SYSTEM (continued)

SURVEILLANCE REQUIREMENTS

- 4.11.2.4.1 Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when Gaseous Radwaste Treatment Systems are not being fully utilized.
- 4.11.2.4.2 The installed VENTILATION EXHAUST TREATMENT SYSTEM and WASTE GAS HOLDUP SYSTEM* shall be demonstrated OPERABLE by operating the WASTE GAS HOLDUP SYSTEM equipment and VENTILATION EXHAUST TREATMENT SYSTEM equipment for at least 30 minutes, at least once per 92 days unless the appropriate system has been utilized to process radioactive gaseous effluents during the previous 92 days.

- * - If the WASTE GAS HOLDUP SYSTEM is not being fully utilized, an Administrative FUNCTIONAL TEST on the WASTE GAS HOLDUP SYSTEM shall also be performed (in addition to the requirements of 4.11.2.4.2's "at least 30 minutes") once per 92 days, by performing the following:
- 1) Place a Gas Decay Tank (containing less than 30 psi) in service.
 - 2) With a Waste Gas Compressor, charge the Gas Decay Tank to at least 150 psi.
 - 3) Following appropriate holdup decay time, sample and release the Gas Decay Tank with an OPERABLE Waste Gas Holdup System Noble Gas Activity Monitor (per TABLE 3.3-13).
 - 4) If discrepancies exist, repairs shall be made and the WASTE GAS HOLDUP SYSTEM Administrative FUNCTIONAL TEST shall be repeated until completed successfully.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 49 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

3/4.11.4 TOTAL DOSE

CONTROLS

3.11.4 In accordance with St. Lucie Plant TS 6.8.4.f.10), the annual (calendar year) dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mremS to the whole body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mremS.

APPLICABILITY: At all times.

ACTION:

a. With the calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Control 3.11.1.2.a, 3.11.1.2.b, 3.11.2.2.a, 3.11.2.2.b, 3.11.2.3.a or 3.11.2.3.b, calculations shall be made including direct radiation contributions from the units (including outside storage tanks etc.) to determine whether the above limits of Control 3.11.4 have been exceeded. If such is the case, prepare and submit to the Commission within 30 days, pursuant to Plant TS 6.9.2, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in Subpart M of 10 CFR Part 20, shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits and if the release condition resulting in violation of 40 Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report is considered a timely request and a variance is granted until staff action on the request is complete.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 50 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

3/4.11.4 TOTAL DOSE (continued)

SURVEILLANCE REQUIREMENTS

- 4.11.4.1 Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Controls 4.11.1.2, 4.11.2.2 and 4.11.2.3 and in accordance with the methodology and parameters in the ODCM.
- 4.11.4.2 Cumulative dose contributions from direct radiation from the units (including outside storage tanks etc.) and Independent Spent Fuel Storage Installation (ISFSI) shall be determined in accordance with the methodology and parameters in the ODCM. This requirement is applicable only under conditions set forth in ACTION a. of Control 3.11.4.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 51 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

3/4.11.5 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS*

ADMINISTRATIVE CONTROLS

3.11.2.5 Licensee initiated major changes to the radioactive waste systems (liquid, gaseous and solid):

- 1) Shall be reported to the Commission in the Annual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the On-Site Review Group (ORG). The discussion of each shall contain:
 - a) A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59.
 - b) Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c) A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d) An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - e) An evaluation of the change which shows the expected maximum exposure to individuals in the UNRESTRICTED AREA and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f) A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period when the changes are to be made;
 - g) An estimate of the exposure to plant operating personnel as a result of the change; and
 - h) Documentation of the fact that the change was reviewed and found acceptable by the ORG.
- 2) Shall become effective upon review and acceptance by the ORG.

* Licensees may choose to submit the information called for in this Administrative Control as part of the annual FUSAR update.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 52 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

3/4.11.6 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT TO THE COMMISSION*

ADMINISTRATIVE CONTROLS

3.11.2.6 As per Technical Specification 6.9.1.7, a Annual Radioactive Effluent Release Report covering the operation of each unit during the previous 12 months of operation shall be submitted within 60 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from each unit. The material provided shall be (1) consistent with the objectives outlined in by items a) through f) below, using the example report format in the ODCM and (2) be in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

- a. The Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, Measuring, Evaluating and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants, Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.
- b. The Radioactive Effluent Release Report to be submitted within 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability and precipitation (if measured) or in the form of joint frequency distributions of wind speed, wind direction and atmospheric stability.** This same report shall include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the unit or station during the previous calendar year.

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

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 53 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

3/4.11.6 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT TO THE COMMISSION* (continued)

ADMINISTRATIVE CONTROLS

3.11.2.6 (continued)

b. (continued)

This same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY (see TS Figure 5.1-1) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses, or an approximate and conservative method used in lieu of actual meteorological measurements. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM.

- c. Every 2 years using the previous 6 months release history for isotopes, determine the controlling age group for liquid pathways. Every 2 years using the previous 1 year or longer interval (to include a refueling outage) and historical meteorological data determine the controlling age group for gaseous pathways. If changed from current submit change to ODCM to reflect new tables for these groups and use the new groups in subsequent dose calculations.
- d. The Radioactive Effluent Release Report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases for the previous calendar year. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in Regulatory Guide 1.109 March 1976.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 54 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

3/4.11.6 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT TO THE COMMISSION* (continued)

ADMINISTRATIVE CONTROLS

3.11.2.6 (continued)

- e. The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:
 1. Volume
 2. Total Curie quantity (specify whether determined by measurement or estimate)
 3. Principal radionuclides (specify whether determined by measurement or estimate)
 4. Type of waste (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms)
 5. Type of container (e.g., LSA, Type A, Type B, Large Quantity) and
 6. Solidification agent or absorbent (e.g., cement, urea formaldehyde).
- f. The Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.
- g. The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the OFFSITE DOSE CALCULATION MANUAL (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the Land Use Census of ODCM Control 3.12.2.
- h. The format for an Annual Radioactive Effluent Release Report is provided in ODCM Methodology Section 4.0. The information contained in an annual report shall not apply to any ODCM Control Dose Limit(s) since the methodology for the annual report is based on actual meteorological data, instead of historical conditions that the ODCM Controls and Control required calculations are based on.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 55 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

3/4.11.6 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT TO THE COMMISSION* (continued)

ADMINISTRATIVE CONTROLS

3.11.2.6 (continued)

- i. Beginning with the report due within 60 days after January 1, 2007, the Radioactive Effluent Release Report shall include the following information for the previous year:
 - a. A listing with descriptions of any leaks or spills that have been communicated to State and Local officials in accordance with the Groundwater Protection INITIATIVE (NEI 07-07).
 - b. Groundwater sample results that have been taken in support of the Groundwater Protection INITIATIVE (NEI 07-07), unless they are from locations that are described in the Radiological Environmental Monitoring Program and will therefore be reported in the Annual Radiological Environmental Operating Report (AREOR).

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 56 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.1 MONITORING PROGRAM

CONTROLS

3.12.1 In accordance with St. Lucie Plant TS 6.8.4.g.1), the Radiological Environmental Monitoring Program shall be conducted as specified in Table 3.12-1.

APPLICABILITY: At all times.

ACTION:

- a. With the Radiological Environmental Monitoring Program not being conducted as specified in Table 3.12-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Control 3.12.4, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.
- b. With the confirmed* level of radioactivity as the result of plant effluents in an environmental sampling medium at a location specified in Appendix B-1 exceeding the reporting levels of Table 3.12-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, pursuant to Plant TS 6.9.2, a Special Report*** that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose** to a MEMBER OF THE PUBLIC is less than the calendar year limit of Controls 3.11.1.2, 3.11.2.2 or 3.11.2.3. When more than one of the radionuclides in Table 3.12-2 are detected in the sampling medium, this report shall be submitted if:

$$\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + > \text{or} = 1.0$$

* A confirmatory reanalysis of the original, a duplicate or a new sample may be desirable, as appropriate. The results of the confirmatory analysis shall be completed at the earliest time consistent with the analysis but in any case within 30 days.

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

*** A copy of the 30-day Special Report shall be provided to the Radiation Protection Manager (or designee) so that it can be sent to State and Local Officials in TABLE-1 of HPP-101 concurrent with its submittal to the commission.

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 57 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.1 MONITORING PROGRAM

Controls (continued)

ACTION:

b. (continued)

When radionuclides other than those in Table 3.12-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose, to a MEMBER OF THE PUBLIC from all radionuclides is equal to or greater than the calendar year limits of Control 3.11.1.2, 3.11.2.2 or 3.11.2.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report required by Control 3.12.4.

c. With milk or broad leaf vegetation samples unavailable from one or more of the sample locations required by Table 3.12-1, identify specific locations for obtaining replacement samples and add them within 30 days to the Radiological Environmental Monitoring Program given in the ODCM. The specific locations from which samples were unavailable may then be deleted from the monitoring program. Pursuant to Control 3.11.2.6, submit in the next Annual Radioactive Effluent Release Report documentation for a change in the ODCM including a revised figure(s) and table for the ODCM reflecting the new location(s) with supporting information identifying the cause of the unavailability of samples and justifying the selection of the new location(s) for obtaining samples.

SURVEILLANCE REQUIREMENTS

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 58 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.12-1
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM^{a)}
 (Page 1 of 3)

| EXPOSURE PATHWAY and/or SAMPLE | NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ^{b) c)} | SAMPLING AND COLLECTION FREQUENCY ^{d)} | TYPE AND FREQUENCY ^{d)} OF ANALYSIS |
|---------------------------------------------|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Direct Radiation ^{e)} | 27 Monitoring Locations | Continuous monitoring with sample collection quarterly ^{f)} | Gamma exposure rate - quarterly |
| 2. Airborne Radioiodine and Particulates | 5 Locations | Continuous sampler operation with sample collection weekly or more frequently if required by dust loading | Radioiodine filter: I-131 analysis weekly Particulate Filter: Gross beta radioactivity analysis ≥ 24 hours following a filter change ^{g)} Gamma isotopic ^{h)} analysis of composite ^{g)} (by location) quarterly |
| 3. Waterborne | | | |
| a. Surface ^{k)} | 1 Location ^{m)} | Weekly | Gamma isotopic ^{h)} & tritium analyses weekly |
| | 1 Location ⁿ⁾ | Monthly | Gamma isotopic ^{h)} & tritium analyses monthly |
| b. Sediment from shoreline | 2 Locations | Semiannually | Gamma isotopic ^{h)} analyses semiannually |
| 4. Ingestion | | | |
| a. Fish and Invertebrates | | | |
| 1. Crustacea | 2 Locations | Semiannually | Gamma isotopic ^{h)} analyses semiannually |
| 2. Fish | 2 Locations | Semiannually | Gamma isotopic ^{h)} analyses semiannually |
| b. Food Products | | | |
| 1. Broad leaf vegetation | 3 Locations ^{p)} | Monthly when available | Gamma isotopic ^{h)} and I-131 analyses monthly |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 59 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.12-1
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM^{a)}
(Page 2 of 3)

TABLE NOTATIONS

- a. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment or other legitimate reasons. If specimens are unobtainable due to sampling equipment malfunction, corrective action shall be taken prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Control 3.12.4.
- b. Specific parameters of distance and direction sector from the centerline of one reactor and additional description where pertinent, shall be provided for each sample location required by Table 3.12-1, in Appendix-B and applicable figures.
- c. At times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the radiological environmental monitoring program.
- d. The following definition of frequencies shall apply to Table 3.12-1 only:
 - Weekly - Not less than once per calendar week. A maximum interval of 11 days is allowed between the collection of any two consecutive samples.
 - Semi-Monthly - Not less than 2 times per calendar month with an interval of not less than 7 days between sample collections. A maximum interval of 24 days is allowed between collection of any two consecutive samples.
 - Monthly - Not less than once per calendar month with an interval of not less than 10 days between sample collections.
 - Quarterly - Not less than once per calendar quarter.
 - Semiannually - One sample each between calendar dates (January 1 - June 30) and (July 1 - December 31). An interval of not less than 30 days will be provided between sample collections.

The frequency of analyses is to be consistent with the sample collection frequency.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 60 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.12-1
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM^{a)}
(Page 3 of 3)

TABLE NOTATIONS
(continued)

- e. One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of or in addition to, integrating dosimeters. For purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters.
- f. Refers to normal collection frequency. More frequent sample collection is permitted when conditions warrant.
- g. Airborne particulate sample filters are analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. In addition to the requirement for a gamma isotopic on a composite sample a gamma isotopic is also required for each sample having a gross beta radioactivity which is >1.0 pCi per cubic meters and which is also >10 times that of the most recent control sample.
- h. Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.
- k. Discharges from the St. Lucie Plant do not influence drinking water or ground water pathways.
- m. Atlantic Ocean, in the vicinity of the public beaches along the eastern shore of Hutchinson Island near the St. Lucie Plant (grab sample)
- n. Atlantic Ocean, at a location beyond influence from plant effluents (grab sample).
- p. Samples of broad leaf vegetation grown nearest each of two different offsite locations of highest predicted annual average ground level D/Q and one sample of similar broad leaf vegetation at an available location 15-30 kilometers distant in the least prevalent wind direction based upon historical data in the ODCM.

[i, j, l (lower case) and o are not used on notation for clarity reasons]

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 61 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 3.12-2
REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS
IN ENVIRONMENTAL SAMPLES
 (Page 1 of 1)

REPORTING LEVELS

| ANALYSIS | WATER pCi/l | AIRBORNE PARTICULATE OR GASES pCi/m ³ | FISH pCi/kg, wet | MILK pCi/l | FOOD PRODUCTS pCi/kg, wet |
|------------------|----------------|-----------------------------------------------------------|---------------------|---------------|---------------------------------|
| H-3 | 30,000* | | | | |
| Mn-54 | 1,000 | | 30,000 | | |
| Fe-59 | 400 | | 10,000 | | |
| Co-58 | 1,000 | | 30,000 | | |
| Co-60 | 300 | | 10,000 | | |
| Zn-65 | 300 | | 20,000 | | |
| Zr- Nb-95*** | 400 | | | | |
| I-131 | 2** | 0.9 | | 3 | 100 |
| Cs-134 | 30 | 10 | 1,000 | 60 | 1,000 |
| Cs-137 | 50 | 20 | 2,000 | 70 | 2,000 |
| Ba- La-140*** | 200 | | | 300 | |

l - as in pCi/l denotes liter

* - Since no drinking water pathway exists, a value of 30,000 pCi/l is used. For drinking water samples, a value of 20,000 pCi/l is used; this is 40 CFR Part 141 value.

** - Applies to drinking water pathway exists, 2 pCi/l is the limit for drinking water.

*** - An equilibrium mixture of the parent daughter isotopes which corresponds to the reporting value of the parent isotope.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 62 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.12-1
DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS ⁽¹⁾⁽²⁾
 (Page 1 of 2)

LOWER LIMIT OF DETECTION (LLD) ⁽³⁾

| ANALYSIS | WATER pCi/l | AIRBORNE PARTICULATE OR GASES pCi/m ³ | FISH pCi/kg, wet | MILK pCi/l | FOOD PRODUCTS pCi/kg, wet | SEDIMENT pCi/kg, dry |
|----------------------------------|----------------|-----------------------------------------------------------|---------------------|---------------|---------------------------------|-------------------------|
| Gross Beta | 4 | 0.01 | | | | |
| H-3 | 3000* | | | | | |
| Mn-54 | 15 | | 130 | | | |
| Fe-59 | 30 | | 260 | | | |
| Co-58, Co-60 | 15 | | 130 | | | |
| Zn-65 | 30 | | 260 | | | |
| Zr-95, Nb-95 ⁽⁴⁾ | 15 | | | | | |
| I-131 | 1** | 0.07 | | 1 | 60 | |
| Cs-134 | 15 | 0.05 | 130 | 15 | 60 | 150 |
| Cs-137 | 18 | 0.06 | 150 | 18 | 80 | 180 |
| Ba-140, La-140 ⁽⁴⁾ | 15 | | | 15 | | |

* No drinking water pathway exists, a value of 2000 pCi/l is for drinking water.

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

TABLE NOTATIONS

- (1) This list does not mean that only these nuclides are to be considered. Other peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report pursuant to Control 3.12.4.
- (2) Required detection capabilities for thermoluminescent dosimeters used for environmental measurements are given in Regulatory Guide 4.13.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 63 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

TABLE 4.12-1
DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS ⁽¹⁾⁽²⁾
 (Page 2 of 2)

TABLE NOTATIONS (continued)

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

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

$$LLD = \frac{4.66 S_b}{E \cdot V \cdot 2.22 \cdot Y \cdot \exp(-\lambda \cdot \Delta T)}$$

Where:

- LLD = the a priori lower limit of detection (pico-Curie per unit mass or volume),
 S_b = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (counts per minute),
 E = the counting efficiency (counts per disintegration),
 V = the sample size (units of mass or volume),
 2.22 = the number of disintegrations per minute per pico-Curie,
 Y = the fractional radiochemical yield, when applicable,
 λ = the radioactive decay constant for the particular radionuclide (sec^{-1}) and
 ΔT = the elapsed time between the midpoint of sample collection and the time of counting (sec).

Typical values of E , V , Y and ΔT should be used in the calculation.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement. Analyses shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally background fluctuations, unavoidable small sample sizes, the presence of interfering nuclides or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors shall be identified and described in the Annual Radiological Environmental Operating Report pursuant to Control 3.12.4.

- (4) An equilibrium mixture of the parent and daughter isotopes which corresponds to 15 pCi/Liter of the parent isotope.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 64 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.2 LAND USE CENSUS

CONTROLS

3.12.2 In accordance with St. Lucie Plant TS 6.8.4.g.2), a Land Use Census shall be conducted and shall identify within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, the nearest residence and the nearest garden* of greater than 50 square meters (500 square feet) producing broad leaf vegetation.

APPLICABILITY: At all times.

ACTION:

- a. With a Land Use Census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Control 4.11.2.3, pursuant to Control 3.11.2.6, identify the new location(s) in the next Annual Radioactive Effluent Release Report.
- b. With a Land Use Census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) 20% greater than at a location from which samples are currently being obtained in accordance with Control 3.12.1, add the new location(s) within 30 days to the Radiological Environmental Monitoring Program given in the ODCM. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after October 31 of the year in which this Land Use Census was conducted. Pursuant to TS 6.14, submit in the next Annual Radioactive Effluent Release Report documentation for a change in the ODCM including a revised figure(s) and table(s) for the ODCM reflecting the new location(s) with information supporting the change in sampling locations.

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

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 65 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.2 LAND USE CENSUS (continued)

SURVEILLANCE REQUIREMENTS

- 4.12.2 The Land Use Census shall be conducted during the growing season at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, aerial survey or by consulting local agriculture authorities. The results of the Land Use Census shall be included in the Annual Radiological Environmental Operating Report pursuant to Control 3.12.4.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 66 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

CONTROLS

3.12.3 In accordance with St. Lucie Plant TS 6.8.4.g.3), analyses shall be performed on all radioactive materials, supplied as part of an Interlaboratory Comparison Program that correspond to samples required by Table 3.12-1.

APPLICABILITY: At all times.

ACTION:

- a. With analyses not being performed as required above, report the corrective action taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Control 3.12.4.

SURVEILLANCE REQUIREMENTS

4.12.3 A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report pursuant to Control 3.12.4. If the Interlaboratory Comparison Program is other than the program conducted by the DOE Mixed Analyte Performance Evaluation Program (MAPEP), then the Interlaboratory Comparison Program shall be described in the ODCM.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 67 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.4 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT (AREOR)*

ADMINISTRATIVE CONTROLS

3.12.4 In accordance with St. Lucie Plant TS 6.9.1.8, an Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations and information based on trend analysis of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided in the AREOR shall be consistent with the objectives outlined below and with Sections IV.B.2, IV.B.3 and IV.C of Appendix I to 10 CFR Part 50.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations and information based on trend analysis of the results of the radiological environmental surveillance activities for the report period, including a comparison, as appropriate, with preoperational studies, with operational controls and with previous environmental surveillance reports and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use census required by Control 3.12.2.

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

The Annual Radiological Environmental Operating Report shall also include the results of the analyses for all samples that have been added to the Radiological Environmental Monitoring Program in support of the Groundwater Protection INITIATIVE (NEI 07-07) - Appendix B-2.

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 68 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.4 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT (AREOR)* (continued)

ADMINISTRATIVE CONTROLS

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of the Interlaboratory Comparison Program, required by Control 3.12.3; discussion of all deviations from the sampling schedule of Table 3.12-1; and discussion of all analyses in which the LLD required by Table 4.12-1 was not achievable.

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

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 69 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

BASES
FOR THE
CONTROLS
AND
SURVEILLANCE REQUIREMENTS

NOTE

The BASES contained in succeeding pages summarize the reasons for the Controls in Section 3.0 and 4.0, but are not part of these Controls.

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 70 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

INSTRUMENTATION

BASES

3.3.3.9 RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

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

3.3.3.10 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

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

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 71 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

3/4.11 RADIOACTIVE EFFLUENTS

BASES

3/4.11.1 LIQUID EFFLUENTS

3/4.11.1.1 CONCENTRATION

This control is provided to ensure that the concentration of radioactive materials released in liquid waste effluents to UNRESTRICTED AREAS will be less than the concentration levels specified in 10 CFR Part 20, Appendix B, Table 2, Column 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water in UNRESTRICTED AREAS will result in exposures within: (1) the Section II.A design objectives of Appendix I, 10 CFR Part 50, to a MEMBER OF THE PUBLIC and (2) the limits of 10 CFR Part 20. The concentration limit for dissolved or entrained noble gases is based upon the assumption that Xe-135 is the controlling radioisotope and its ECL in air (submersion) was converted to an equivalent concentration in water using the methods described in International Commission on Radiological Protection (ICRP) Publication 2.

This control applies to the release of radioactive materials in liquid effluents from all units at the site.

The required detection capabilities for radioactive materials in liquid waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD and other detection limits can be found in Currie, L.A., Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements, NUREG/CR-4007 (September 1984) and in the HASL Procedures Manual, HASL-300.

3/4.11.1.2 DOSE

This control is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10 CFR Part 50. The Control implements the guides set forth in Section II.A of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in liquid effluents to UNRESTRICTED AREAS will be kept as low as is reasonably achievable. Also, for fresh water sites with drinking water supplies that can be potentially affected by plant operations, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess of the requirements of 40 CFR Part 141. The dose calculation methodology and parameters in the ODCM implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 72 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

3/4.11 RADIOACTIVE EFFLUENTS (Continued)

BASES

3/4.11.1 LIQUID EFFLUENTS (Continued)

3/4.11.1.2 DOSE (Continued)

The equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid effluents are consistent with the methodology provided in Regulatory Guide 1.109, Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I, Revision 1, October 1977 and Regulatory Guide 1.113, Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I, April 1977.

This control applies to the release of radioactive materials in liquid effluents from each unit at the site. For units with shared Radwaste Systems, the liquid effluents from the shared system are to be proportioned among the units sharing that system.

3/4.11.1.3 LIQUID RADWASTE TREATMENT SYSTEM

The OPERABILITY of the Liquid Radwaste Treatment System ensures that this system will be available for use whenever liquid effluents require treatment prior to release to the environment. The requirement that the appropriate portions of this system be used when specified provides assurance that the releases of radioactive materials in liquid effluents will be kept as low as is reasonably achievable. This control implements the requirements of 10 CFR 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50 and the design objective given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the Liquid Radwaste Treatment System were specified as a suitable fraction of the dose design objectives set forth in Section II.A of Appendix I, 10 CFR Part 50 for liquid effluents.

This control applies to the release of radioactive materials in liquid effluents from each unit at the site. For units with shared Radwaste Treatment Systems, the liquid effluents from the shared system are to be proportioned among the units sharing that system.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 73 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

BASES

3/4.11.2 GASEOUS EFFLUENTS

3/4.11.2.1 DOSE RATE

This control is provided to ensure that the dose at any time at and beyond the SITE BOUNDARY from gaseous effluents from all units on the site will be within the annual dose limits of 10 CFR Part 20 to UNRESTRICTED AREAS. The annual dose limits are the doses associated with the concentration of 10 CFR Part 20, Appendix B, Table 2, Column I. These limits provide reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC in an UNRESTRICTED AREA, either within or outside the SITE BOUNDARY, to an annual average concentration exceeding the limits specified in Appendix B, Table 2 of 10 CFR Part 20 (Subpart D of 10 CFR Part 20). For MEMBERS OF THE PUBLIC who may at times be within the SITE BOUNDARY, the occupancy of that MEMBER OF THE PUBLIC will usually be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the SITE BOUNDARY. The specified release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to a MEMBER OF THE PUBLIC at or beyond the SITE BOUNDARY to less than or equal to 500 mrem/year to the total body or to less than or equal to 3000 mrem/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mrem/year.

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

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of the lower limits of detection (LLDs). Detailed discussion of the LLD and other detection limits can be found in Currie, L. A., Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements, NUREG/CR-4007 (September 1984) and in the HASL Procedures Manual, HASL-300.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 74 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

BASES

3/4.11.2.1 DOSE - NOBLE GASES

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

This control applies to the release of radioactive materials in gaseous effluents from each unit at the site. For units with shared Radwaste Treatment Systems, the gaseous effluents from the shared system are to be proportioned among the units sharing that system.

3/4.11.2.3 DOSE - IODINE-131, IODINE-133, TRITIUM AND RADIOACTIVE MATERIAL IN PARTICULATE FORM

This control is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50. The Controls are the guides set forth in Section II.C of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents to UNRESTRICTED AREAS will be kept as low as is reasonably achievable. The ODCM calculational methods specified in the Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 75 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

BASES

3/4.11.2.1 DOSE - NOBLE GASES (Continued)

3/4.11.2.3 DOSE - IODINE-131, IODINE-133, TRITIUM AND RADIOACTIVE MATERIAL IN PARTICULATE FORM (Continued)

The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject material are consistent with the methodology provided in Regulatory Guide 1.109, Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I, Revision 1, October 1977 and Regulatory Guide 1.111, Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors, Revision 1, July 1977. These equations also provide for determining the actual doses based upon the historical average atmospheric conditions. The release rate controls for Iodine-131, Iodine-133, tritium and radionuclides in particulate form with half-lives greater than 8 days are dependent upon the existing radionuclide pathways to man in the areas at and beyond the SITE BOUNDARY. The pathways that were examined in the development of the calculations were: (1) individual inhalation of airborne radionuclides, (2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, (3) deposition onto grassy areas where milk animals and meat producing animals graze with consumption of the milk and meat by man and (4) deposition on the ground with subsequent exposure of man.

This control applies to the release of radioactive materials in gaseous effluents from each unit at the site. For units with shared Radwaste Treatment Systems, the gaseous effluents from the shared system are proportioned among the units sharing that system.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 76 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

BASES

3/4.11.2.4 GASEOUS RADWASTE TREATMENT SYSTEM

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

This control applies to the release of radioactive materials in gaseous effluents from each unit at the site. For units with shared Radwaste Treatment Systems, the gaseous effluents from the shared system are proportioned among the units sharing that system.

3/4.11.2.5 NOT USED

3/4.11.2.6 NOT USED

3/4.11.3 NOT USED

3/4.11.4 TOTAL DOSE

This control is provided to meet the dose limitations of 10 CFR Part 190 that have been incorporated into 10 CFR Part 20 by 46 FR 18525. The control requires the preparation and submittal of a Special Report whenever the calculated doses due to releases of radioactivity and to radiation from uranium fuel cycle sources exceed 25 mrem to the whole body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrem. For sites containing up to four reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the units (including outside storage tanks, etc.) are kept small. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 77 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOACTIVE EFFLUENTS

BASES

3/4.11.4 TOTAL DOSE (Continued)

For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 kilometers must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40 CFR Part 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR 190.11 and Subpart M of 10 CFR Part 20, is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190 and does not apply in any way to the other requirements for dose limitation of 10 CFR Part 20, as addressed in Controls 3.11.1.1 and 3.11.2.1. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 78 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

BASES

3/4.12.1 MONITORING PROGRAM

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

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

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

3/4.12.2 LAND USE CENSUS

This control is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the Radiological Environmental Monitoring Program given in the ODCM are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey or from consulting with local agricultural authorities shall be used.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 79 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

RADIOLOGICAL ENVIRONMENTAL MONITORING

BASES

3/4.12.2 LAND USE CENSUS (Continued)

This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 square meters provides assurance that significant exposure pathways via leafy vegetables will be identified and monitored since a garden of this size is the minimum required to produce the quantity (26 kilograms/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: (1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage) and (2) a vegetation yield of 2 kilograms per square meter.

3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

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

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 80 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

METHODOLOGY SECTION

METHODOLOGY
for the
CONTROLS
AND
SURVEILLANCE REQUIREMENTS

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 81 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION
GLOSSARY OF COMMONLY USED TERMS IN METHODOLOGY SECTION

(Page 1 of 3)

| | |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| D _B | - Dose from Beta Radiation |
| CC or cc | - Cubic centimeter |
| Ci | - Curies - a unit of radioactivity see μCi |
| C _i | - Activity or concentration of a nuclide in the release source. Units of μCi , $\mu\text{Ci/cc}$ or $\mu\text{Ci/ml}$ |
| CFR | - Code of Federal Regulations |
| Control(s) | - Regulations for operating, controlling, monitoring and reporting radioactive effluent related activity as indicated by the Controls Section of the ODCM. |
| Dose | - The exposure, in mrem or mrad, the organ or the individual receives from radioactive effluents |
| Dose Factor | - Normally, a factor that converts the effect of ingesting radioactive material into the body, to dose to a specific organ. Body elimination, radioactive decay and organ uptake are some of the factors that determine a dose factor for a given nuclide |
| Dose Pathway | - A specific path that radioactive material physically travels through prior to exposing an individual to radiation. The Grass-Cow-Milk-Infant is a dose pathway |
| Dose Rate | - The dose received per unit time |
| (D/Q) | - A long term D over Q - a factor with units of $1/\text{m}^2$ which describes the deposition of particulate matter from a plume at a point downrange from the source. It can be thought of as what part of the cloud is going to fallout and deposit over one square meter of ground. (See Appendix C). |
| ECL | - Effluent Concentration Limit |
| FUSAR | - Final Updated Safety Analysis Report. |
| Y | - A gamma photon - The dose from Gammas in air, etc. |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 82 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION
GLOSSARY OF COMMONLY USED TERMS IN METHODOLOGY SECTION
(Page 2 of 3)

| | |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ground Plane | - Radioactive material deposited uniformly over the ground emits radiation that produces an exposure pathway when an individual is standing, sitting, etc., in the area. It is assumed that an adult receives the same exposure as an infant, regardless of the physical height differences. Only the whole body is considered for the ODCM. |
| H-3 | - Hydrogen-3 or Tritium, a weak Beta emitter |
| I&8DP | - Radioiodines and particulates with half-lives greater than 8 days |
| m ³ | - Cubic Meters |
| m ² | - Square Meters |
| nuclide | - For the purposes of this manual, a radioactive isotope. Nuclide (i) signifies a specific nuclide, the 1st, 2nd, 3rd one under consideration. If nuclide (i) is I-131, then the M _i (dose factor) under consideration should be M _{I-131} for example. |
| Organ | - For the ODCM either the bone, liver, thyroid, kidney, lung, GI-LLI or the Whole Body. Whole Body is considered an organ for ease of writing the methodology in the ODCM. |
| pCi | - 1 pico-Curie = 1.E-12 Curies. |
| (Q Dot) _i | - (Q Dot) _i - Denotes a release rate in μCi/sec for nuclide (i). |
| Q _i | - Denotes μCi of nuclide (i) released over a specified time interval. |
| Radioiodines | - Iodine-131 and Iodine I-133 for gaseous release pathways. |
| Receptor | - The individual receiving the exposure in a given location or who ingests food products from an animal for example. A receptor can receive dose from one or more pathways. |
| Release Source(s) | - A subsystem, tank or vent where radioactive material can be released independently of other radioactive release points. |
| TS | - The St. Lucie Plant Standard Technical Specifications |
| Total Body | - Same as Whole Body in Control Statements |
| μCi | - micro Curies. 1 μCi = 10 ⁻⁶ Curies. The μCi is the standard unit of radioactivity for all dose calculations in the ODCM. |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 83 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION
GLOSSARY OF COMMONLY USED TERMS IN METHODOLOGY SECTION

(Page 3 of 3)

- | | |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (X/Q) | - A long term Chi over Q. It describes the physical dispersion characteristics of a semi-infinite cloud of noble gases as the cloud traverses downrange from the release point. Since Noble Gases are inert, they do not tend to settle out on the ground. (See Appendix C). |
| (X/Q) _D | - A long term Depleted Chi over Q. It describes the physical dispersion characteristics of a semi-infinite cloud of radioactive iodines and particulates as the cloud travels downrange. Since iodines and particulates tend to settle out (fallout of the cloud) on the ground, the (X/Q) _D represents what physically remains of the cloud and its dispersion qualities at a given location downrange from the release point. (See Appendix C). |
| dt, Δt or delta t | - A specific delta time interval that corresponds with the release interval data etc. |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 84 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.0 LIQUID RELEASES METHODOLOGY

1.1 Radioactive Liquid Effluent Model Assumptions

The FUSAR contains the official description of the site characteristics. The description that follows is a brief summary for dose calculation purposes:

The St. Lucie Plant is located on an island surrounded on two sides by the Atlantic Ocean and the Indian River, an estuary of the Atlantic Ocean. Normally, all radioactive liquid releases enter the Atlantic Ocean where the Circulating Water Discharge Pipe terminates on the ocean floor at a point approximately 1200 feet offshore (Figure 1-1 Point "L"). No credit is taken for subsequent mixing of the discharge flume with the ocean. The diffusion of radioactive material into the ocean is dependent on the conditions of tide, wind and some eddy currents caused by the Gulf Stream. The conditions are sufficiently random enough to distribute the discharges over a wide area and no concentrating effects are assumed.

There are no direct discharge paths for liquid effluents to either of the north or south private property boundary lines. The Big Mud Creek (part of the Indian River) does connect to a normally locked shut dam, that is intended to provide an emergency supply of circulating water to the Intake Cooling Water Canal in the event a Hurricane causes blockage of the Intake Canal. No radioactive water from plant systems could be discharged directly into the Intake Cooling Water Canal because all plant piping is routed to the discharge canal and no back flow can occur. However, dilute secondary sources from such outfalls as the industrial wastewater system and construction dewatering may be pumped to the Intake Canal. These secondary sources would be secured under the extraordinary conditions that would precede opening the dam. Consult the FUSAR for a detailed description of characteristics of the water bodies surrounding the plant site.

Only those nuclides that appear in the Liquid Dose Factor Tables will be considered for dose calculation.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 85 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.2 Determining the Fraction F of 10 CFR Part 20 ECLs Limits for A Liquid Release Source

Discussion - Control 3.11.1.1 requires that the sampling and analysis results of liquid waste (prior to discharge) be used with calculation methods in the in-plant procedures to assure that the concentration of liquid radioactive material in the unrestricted areas will not exceed ten times the concentrations specified in 10 CFR Part 20, Appendix B, Table 2. CY-SL-102-0104, Processing Aerated Liquid Waste, provides instruction for ensuring batch release tanks will be sampled after adequate mixing. This section presents the calculation method to be used for this determination. This method only addresses the calculation for a specific release source. The in-plant procedures will provide instructions for determining that the summation of each release source's F values do not exceed the site's 10 CFR Part 20 ECL. The values for release rate, dilution rate, etc., will also have to be obtained from in-plant procedures. The basic equation is:

$$F_L = \frac{R}{D} \sum_{i=1}^n \frac{C_i}{(ECL)_i}$$

Where:

F_L = the fraction of 10 CFR Part 20 ECL that would result if the release source was discharged under the conditions specified.

R = The undiluted release rate in gpm of the release source.
 Liquid Rad Waste = 170 gpm for Waste Monitor Tank
 Steam Generator = 125 gpm/Steam Generator
 Liquid Rad Waste = 60 gpm for AWST #2
 Liquid Rad Waste = 60 gpm for Laundry Drain Pumps 2A/2B

D = The dilution flow in gpm of Intake Cooling Water or Circulating Water Pumps
 Intake Cooling flow is 14,500 gpm/pump
 Circulating Water flow is 121,000 gpm/pump

C_i = The undiluted concentration of nuclide (i) in $\mu\text{Ci/ml}$ from sample assay

$(ECL)_i$ = The Effluent Concentration Limit of nuclide (i) in $\mu\text{Ci/ml}$ from Table L-1.
 For dissolved or entrained noble gases the ECL value is $2 \times 10^{-4} \mu\text{Ci/ml}$ for the sum of all gases.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 86 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.2 Determining the Fraction F of 10 CFR Part 20 ECLs Limits for A Liquid Release Source (continued)

The fraction of the 10 CFR Part 20 ECL limit may be determined by a nuclide-by-nuclide evaluation or for purposes of simplifying the calculation by a cumulative activity evaluation. If the simplified method is used, the value of 3×10^{-8} $\mu\text{Ci/ml}$ (unidentified ECL value) should be substituted for $(\text{ECL})_i$ and the cumulative concentration (sum of all identified radionuclide concentrations) or the gross concentration should be substituted for C_i . As long as the diluted concentration ($C_{\text{total}} R/D$) is less than 3×10^{-8} $\mu\text{Ci/ml}$, the nuclide-by-nuclide calculation is not required to demonstrate compliance with the 10 CFR Part 20 ECL. The following section provides a step-by-step procedure for determining the ECL fraction.

1. Calculation Process for Solids
 - A. Obtain from the in-plant procedures, the release rate value (R) in gpm for the release source.
 - B. Obtain from the in-plant procedures, the dilution rate (D) in gpm. No credit is taken for any dilution beyond the discharge canal flow.
 - C. Obtain (C_i) , the undiluted assay value of nuclide (i), in $\mu\text{Ci/ml}$. If the simplified method is used, the cumulative concentration (C_{total}) is used.
 - D. From Table L-1, obtain the corresponding (ECL) for nuclide (i) in $\mu\text{Ci/ml}$. The value of 3×10^{-8} $\mu\text{Ci/ml}$ should be used for the simplified method.
 - E. Divide C_i by $(\text{ECL})_i$ and write down the quotient
 - F. If the simplified method is used, proceed to the next step. If determining the ECL fraction by the nuclide-by-nuclide evaluation, repeat steps 1.2.1.C through 1.2.1.E for each nuclide reported in the assay, for H_3 from previous month composite and for SR89/90 and Fe55 from previous quarter composite with known results.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 87 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.2 Determining the Fraction F of 10 CFR Part 20 ECLs Limits for A Liquid Release Source (continued)

1. Calculation Process for Solids (continued)

- G. Add each $C_i/(ECL)$ quotient from step 1.2.1.E and solve for F_L as follows:

$$F_L = \frac{R}{D} \sum_{i=1}^n \frac{C_i}{(ECL)_i}$$

F_L = a unit-less value where:

the value of F_L could be \leq or >1 . The purpose of the calculation is to determine what the initial value of F_L is for a given set of release conditions.

- H. The F_L value just obtained is for one release pathway. The TS and ODCM control 3.11.1.1 allow for a site limit of F_L less than or equal to 10. Chemistry Procedure CY-SL-102-0104 administratively controls each pathway's allocation. Compare your F_L result with the administrative control for the release pathway in CY-SL-102-0104.

2. Calculation Process for Gases in Liquid

- A. Sum the $\mu Ci/ml$ of each noble gas activity reported in the release.
- B. The values of R and D from 1.2.1 above shall be used in the calculations below:

$$F_g = \frac{(\text{sum of 1.2.2.A}) \mu Ci/ml}{1} \times \frac{R}{D}$$

- C. F_g shall be less than $2 \times 10^{-4} \mu Ci/ml$ for the site for all releases in progress. Each release point will be administratively controlled. Consult CY-SL-102-0104 procedure for instructions.

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 88 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

METHODOLOGY SECTION

1.3 Determining Setpoints for Radioactive Liquid Effluent Monitors

1.3.1 Setpoints for Batch Liquid Release Monitors channel numbers R6627 and 301 on Table 3.3-14, Radioactive Effluent Monitor Setpoint Basis, are the Batch Liquid Effluent Monitors.

Discussion - Control 3.3.3.9 requires that the liquid effluent monitoring instrumentation alarm / trip setpoints be set to initiate an alarm or trip so that the radioactivity concentration in water in the unrestricted area does not exceed the concentration of 10 CFR Part 20, Appendix B, Table 2 as a result of radioactivity in liquid effluents (Control 3.11.1.1).

Gross cpm vs. total liquid activity curves are available for Batch Liquid Effluent Monitors based on a composite of real release data. A direct correlation between gross cpm and the concentrations that would achieve 10 CFR Part 20 ECL levels in the discharge canal can be estimated. The 1978 liquid release data from annual reports was used to determine the average undiluted release concentration. These concentrations were then projected to a diluted concentration in the discharge canal assuming a 1 gpm release rate and a constant dilution flow of 121,000 gpm from 1 circ. water pump. This diluted activity was divided by the nuclide's respective 10 CFR Part 20 ECL value (Table L-1) to obtain the Mi column on the table that follows:

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 89 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.3 Determining Setpoints for Radioactive Liquid Effluent Monitors (continued)

| NUCLIDE SYMBOL | 1978 UNDILUTED $\mu\text{Ci/ml}^1$ | M_i^2 (no units) |
|----------------------|------------------------------------|--------------------|
| I-131 | 4.43 E-5 | 3.66 E-4 |
| I-132 | 2.23 E-7 | 1.84 E-8 |
| I-133 | 3.17 E-6 | 3.74 E-6 |
| I-135 | 1.31 E-6 | 3.61 E-7 |
| Na-24 | 1.72 E-7 | 2.84 E-8 |
| Cr-51 | 2.51 E-5 | 4.15 E-7 |
| Mn-54 | 5.64 E-6 | 1.55 E-6 |
| Mn-56 | 1.11 E-9 | 1.31 E-10 |
| Co-57 | 3.69 E-7 | 5.08 E-8 |
| Co-58 | 1.51 E-4 | 6.24 E-5 |
| Fe-59 | 2.92 E-6 | 2.41 E-6 |
| Co-60 | 3.66 E-5 | 1.01 E-4 |
| Zn-65 | 4.55 E-7 | 7.52 E-7 |
| Ni-65 | 8.23 E-7 | 6.8 E-8 |
| Ag-110 | 1.96 E-6 | 2.70 E-6 |
| Sn-113 | 5.75 E-7 | 1.58 E-7 |
| Sb-122 | 2.15 E-6 | 1.78 E-6 |
| Sb-124 | 8.40 E-6 | 9.92 E-6 |
| W-187 | 3.51 E-6 | 9.67 E-7 |
| Np-239 | 1.57 E-7 | 6.49 E-8 |
| Br-82 | 3.64 E-7 | 7.52 E-8 |
| Zr-95 | 2.82 E-5 | 1.17 E-5 |
| Zr-97 | 4.05 E-6 | 3.72 E-6 |
| Mo-99 | 3.24 E-6 | 1.34 E-6 |
| Ru-103 | 3.84 E-8 | 1.06 E-8 |
| Sb-125 | 2.26 E-6 | 6.23 E-7 |
| Cs-134 | 2.14 E-5 | 1.97 E-4 |
| Cs-136 | 7.82 E-7 | 1.08 E-6 |
| Cs-137 | 4.85 E-5 | 4.01 E-4 |
| Ba-140 | 6.44 E-7 | 6.65 E-7 |
| Ce-141 | 3.04 E-8 | 8.38 E-9 |
| Ce-144 | 2.37 E-6 | 6.53 E-6 |
| $A_{\text{tot}} =$ | 4.01 E-4 | |
| $M_{\text{Total}} =$ | | 1.18 E-3 |

(1) 1978 Undiluted Release Volume = 7 E 9 ml.

$$(2) \quad M_i = \frac{1978 \text{ Undil. Act Nuclide (i)}}{\text{ECL}_i \text{ (from Table L - 1)}} \times \frac{1 \text{ gpm (release rate)}}{121000 \text{ gpm (dil rate)}}$$

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 90 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.3 Determining Setpoints for Radioactive Liquid Effluent Monitors (continued)

A_{Tot} is the total average $\mu\text{Ci/ml}$ concentration of the reference mixture and M_{Tot} is the fraction of the MPC of all nuclides for the release conditions specified. Dividing A_{Tot} by M_{Tot} yields A_{Max} , which is the maximum total activity concentration equivalent to the ECL limit for the nuclide distribution typical of radwaste discharges. The Technical Specifications allow 10 times the ECL limit where the Site Limit is 10 times A_{Max} as follows:

$$A_{Max} = \frac{A_{Tot}}{M_{Tot}} = \frac{4.01\text{E}-4}{1.18\text{E}-3} = 0.34 \mu\text{Ci/ml} = \text{ECL Limit}$$

$$\text{Site Limit} = 10 \times A_{Max} = 10 \times 0.34 = 3.4 \mu\text{Ci/ml}$$

To provide conservative administrative control, A_{Max} of $0.34 \mu\text{Ci/ml}$ should be used as follows:

1. If the effluent monitor requires counts per minute units, a (C_{max}) value in cpm should be obtained for the A_{max} ($0.34 \mu\text{Ci/ml}$) from the release sources radioactive liquid effluent monitor curve of cpm vs. $\mu\text{Ci/ml}$.

NOTE

This setpoint is for a specified release of 1 gpm into 121000 gpm dilution flow.

2. For establishing the setpoint prior to liquid radwaste discharges, the A_{max} (or C_{max}) will be adjusted as needed to account for actual release conditions (i.e., actual design maximum discharge flow rate, dilution flow rate and the contribution of dissolved and entrained Nobles Gas Activity to the Monitor Activity Level).

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 91 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.3 Determining Setpoints for Radioactive Liquid Effluent Monitors (continued)

1.3.2 Setpoints for Continuous Liquid Release Monitors

Discussion - The activity mixture described in 1.3.1 for Liquid Batch Release Monitors cannot be used for Continuous Liquid Pathways since the Steam Generator (S/G) Blowdown Secondary Side is subject to what the current Reactor Coolant System (RCS) activity and primary-to-secondary leakage exist at any time. Although S/G blowdown is not normally aligned to the Site Liquid Radwaste Release Point (Figure 1-1), the monitor setpoints will be based on the ODCM maximum design S/G blowdown rate of 125 gpm with 1 Circulating Water Pump (CWP) 121,000 gpm in operation. The ODCM and CY-SL-102-0104, Processing Liquid Waste assume that the fraction of solids entering the Discharge Canal to the site release point are controlled less than or equal to 1.0, with batch release using 80% and the remaining 20% allocated to continuous sources on site. The actual site limit for solids is 10 times the concentration specified in 10 CFR Part 20, therefore a conservation factor of 10 is already included in the administrative site limit.

Since source in-leakage to a S/G cannot be controlled, a High alarm monitor setpoint is calculated based on one S/G releasing to the discharge canal at design blowdown rate while attaining the 20 percent of the site limit (F_L) assuming all the gross solid activity is I-131. The contribution from Dissolved and Entrained Gases is assumed to be zero with all of the gaseous activity going to the Steam Condenser and Air Ejector pathway.

$$F_L \text{ at } 20\% = \frac{0.2}{1} = \frac{\text{Design blowdown rate}}{1 \text{ CWP Dilution rate}} \times \frac{\text{I-131 uCi/ml (S/G)}}{\text{I-131 uCi/ml (Table L-1ECL)}}$$

$$F_L \text{ at } 20\% = \frac{0.2}{1} = \frac{125 \text{ gal/min}}{121,000 \text{ gal/min}} \times \frac{\text{I-131 uCi/ml (S/G)}}{1.E-06 \text{ uCi/ml (I-131 Table L-1ECL)}}$$

Solving for the **S/G High Alarm Setpoint I-131 Activity**,

I-131 uCi/ml (S/G) = **~2E-04 uCi/ml I-131** is the maximum S/G activity that could be allowed such that 20 percent of the administrative discharge canal limit would not be exceeded.

This S/G Monitor High Alarm Setpoint activity may be converted to cpm using Liquid Monitor uC/ml to cpm conversion constants.

This Setpoint is conservative given that the actual Liquid Site Limit is a factor of ten times higher than the administrative limit used for calculation purposes, that I-131's ECL is conservative vs other isotope mixtures, and that it is unlikely that more than one S/G would be allowed to operate with a 20 gallon per day primary-to-secondary leak rate.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 92 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.4 Determining the Dose for Radioactive Liquid Releases

Discussion - Control 3.11.1.2 requires calculations be performed at least once per 31 days to verify that cumulative radioactive liquid effluents do not cause a dose in excess of 1.5 mrem to the whole body and 5 mrem to any organ during any calendar quarter and not in excess of 3 mrem to the whole body and 10 mrem to any organ during any calendar year. This section presents calculational method to be used for this verification.

This method is based on the methodology suggested by sections 4.3 and 4.3.1 of NUREG-0133 Revision 1, November, 1978. The dose factors are a composite of both the fish and shellfish pathways so that the fish-shellfish pathway is the only pathway for which dose will be calculated. The dose for adult, child and teenager can also be calculated by this method provided that their appropriate dose factors are used for the organ of interest. An infant is excluded from Liquid Dose Pathway at St. Lucie since they do not eat fish-shellfish. The effluent supervisor will track which age group is the controlling (most restrictive) age group (see control 3.11.2.6.c). Only those nuclides that appear in the Tables of this manual will be considered.

1. This method provides for a dose calculation to the whole body or any organ for a given age group based on real release conditions during a specified time interval for radioactive liquid release sources. The equation is:

Where:

$$D_{1T} = \frac{A_{iT} dt_1 Q_{i1}}{(DF)_1}$$

= dose commitment in mrem received by organ T of age group (to be specified) during the release time interval dt_1 .

A_{iT} = the composite dose factor for the fish-shellfish pathway for nuclide (i) for organ T of age group (to be specified). The A_{iT} values listed in the Tables in this manual are independent of any site specific information and have the units

$$\frac{\text{mrem} - \text{ml}}{\mu\text{Ci} - \text{hr}}$$

dt_1 = the number of hours that the release occurs.

Q_{i1} = The total quantity of nuclide (i) release during dt_1 (μCi)

$(DF)_1$ = The total volume of dilution that occurred during the release time period dt_1 (i.e., the circulating water flow times time)

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 93 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.4 Determining the Dose for Radioactive Liquid Releases (continued)

1. (continued)

The doses associated with each release may then be summed to provide the cumulative dose over a desired time period (e.g., sum all doses for release during a 31 day period, calendar quarter or a year).

$$D_{\text{total}\tau} = \sum D_{1\tau}$$

Where:

$D_{\tau\tau}$ = the total dose commitment to organ τ due to all releases during the desired time interval (mrem)

NOTE

Table 1.4 may be used for compiling the dose accounting.

- A. Determine the time interval dt_i in hours that the release took place. For once per 31 day dose calculations dt_i would be for the entire month's hours.

For quarterly dose calculations dt_i would be the hours in the quarter, and for annual dose calculations dt_i would be the hours in the year. If required, dt_i may be hours of duration of a single release to evaluate a batch release.
- B. Obtain $(DF)_i$ for the time period dt_i from Liquid Waste Management Records for the release source(s) of interest.
- C. Obtain Q_i for nuclide (i) for the time period dt_i from the Liquid Waste Management Records
- D. Obtain $A_{i\tau}$ from the appropriate Liquid Dose Factor Table

| Age Group | Dose Factor Table |
|-----------|-------------------|
| Infant | N/A |
| Child | L-4 |
| Teen | L-3 |
| Adult | L-2 |

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 95 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

1.5 Projecting Dose for Radioactive Liquid Effluents

Discussion - Control 3.11.1.3 requires that appropriate subsystems of the liquid radwaste treatment system be used to reduce radioactive material in liquid effluents when the projected doses due to the liquid effluent, from each unit, to UNRESTRICTED AREAS (see TS Figure 5.1-1) would exceed 0.06 mrem to the whole body or 0.2 mrem to any organ in a 31 day period. The following calculation method is provided for performing this dose projection. The method is based on dose as calculated in section 1.4 with the adult as the bases for projecting.

1. For the controlling age group obtain the latest result of the monthly calculation of the whole body dose and the highest organ dose. These doses can be obtained from the in-plant records.
2. Divide each dose by the number of days the reactor plant was operational during the month.
3. Multiply the quotient of each dose by the number of days the reactor plant is projected to be operational during the next month. The products are the projected dose for the next month. These values should be adjusted as needed to account for any changes in failed fuel or other identifiable operating conditions that could significantly alter the actual releases.
4. If the projected dose is greater than 0.06 mrem to the whole body or greater than 0.2 mrem to the adults highest exposed organ, the liquid radwaste system shall be used.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 96 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.0 GASEOUS RELEASES METHODOLOGY

2.1 Gaseous Effluent Model Assumptions

Description of Site - (The FUSAR contains the official description of the site characteristics. The description that follows is a brief summary for dose calculation purposes only). The St. Lucie Plant is located on an island surrounded on two sides by the Atlantic Ocean and the Indian River, an estuary of the Atlantic Ocean. Private property adjoins the plant site in the north and south directions. A meteorological tower is located north of the plant near the site property line. There are 16 sectors, for dose calculation purposes, divided into 22.5° each. The MET tower is calibrated such that a zero degree bearing coincides with TRUE NORTH. A bearing of zero degrees dissects the north sector such that bearings of 348.75° and 11.25° define the boundaries of the north sector. The nearest distance to private property occurs in the north sector at approximately 0.97 miles. For ease of calculation, this 0.97 mile radius is assumed in all directions, although the real Unrestricted Area Boundary is defined in Figure 5.1-1 of the TS. Doses calculated over water areas do not apply to Controls or the annual report and may be listed as O.W. (over water) in lieu of performing calculations. The 0.97 mile range in the NW sector is O.W., but it was chosen as the worst sector for conservative dose calculations using the historical MET data.

Historical MET Data - MET data, between September 1, 1976 and August 31, 1978, from the St. Lucie MET Tower was analyzed by Dames & Moore of Washington, D.C. The methodology used by Dames & Moore was consistent with methods suggested by Regulatory Guide 1.111, Revision 1. Recirculation correction factors were also calculated for the St. Lucie Site and are incorporated into the historical MET tables (Tables M5, M6 and M7) in Appendix A of this manual. It was determined that these two years are representative data for this locale.

The long-term, annual-average χ/Q and D/Q values should be reevaluated periodically (e.g., every 3–5 years). If the periodic reevaluation indicates the controlling/limiting long-term, annual-average χ/Q and D/Q values are substantially nonconservative (e.g., higher by 20–30 percent or more with respect to historical data), the licensee should ensure that the χ/Q and D/Q values used in the dose assessment are revised or that the ARERR addresses why such changes are not deemed necessary. Acceptable reasoning includes evaluating data anomalies, identification of failures in meteorological sensors, and documentation that the locality experienced abnormal weather patterns.

| | | |
|----------------|----------------------------------------|-----------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 97 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

METHODOLOGY SECTION

2.1 Gaseous Effluent Model Assumptions (continued)

Dose Calculations - Dose calculations for Control dose limits are normally calculated using historical MET data and receptor location(s) which yield calculated doses no lower than the real location(s) experiencing the most exposure. Actual MET data factors are calculated and are normally used in dose calculations for the annual reports. Approximate and conservative methods may be used in lieu of actual meteorological measurements.

Live MET data and hour-by-hour dose calculations are beyond the scope of this manual. Historical information and conservative receptor locations, etc., are only used for ease of Control dose limit calculations. Dose calculations for Control dose limits may be performed using actual MET data and real receptor locations. Any dose calculations performed with actual data should note the source of the data in the annual report. Actual MET data reduction should be performed in accordance with Regulatory Guide 1.111, Revision 1 and should incorporate Recirculation Correction Factors from Table M-4 of this manual.

The St. Lucie site uses the long term ground release model for all gaseous effluents. Only those radionuclides that appear in the gaseous effluent dose factor tables will be considered in any dose calculations. Radioiodines are defined as Iodine-131 and I-133 for application to Controls. Other nuclides of Iodine may be included in dose calculations for ease of performing calculations, but their dose contribution does not have to be included in the Control requirements. Land Census information will apply to the calendar year following the year that the census was taken in to avoid splitting quarters, etc.

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 98 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors

Discussion - Control 3.11.2.1 limits the dose rate from noble gases in airborne releases to <500 mrem/yr - total body and <3000 mrem/yr - skin. Control 3.3.3.11 requires that the gaseous radioactive effluent monitoring instrumentation be operable with alarm/trip setpoints set to ensure that these dose rate limits are not exceeded. The results of the sampling and analysis program of Control Table 4.11-2 are used to demonstrate compliance with these limits.

The following calculation method is provided for determining the dose rates to the total body and skin from noble gases in airborne releases. The alarm/trip setpoints are based on the dose rate calculations. The Controls apply to all airborne releases on the site but all releases may be treated as if discharged from a single release point. Only those noble gases appearing in Table G-2 will be considered. The calculation methods are based on Sections 5.1 and 5.2 of NUREG-0133, November 1978. The equations are:

For TOTAL BODY Dose Rate:

$$DR_{TB} = \sum_i^n K_i (X/Q) (Q \text{ DOT})_i$$

For TOTAL SKIN Dose Rate:

$$DR_{skin} = \sum_i^n [L_i + 1.1M_i] (X/Q) (Q \text{ DOT})_i$$

| | | |
|-------------------------|------------------------------------------------------------|--------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 99 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

Where:

DR_{TB} = total body dose rate from noble gases in airborne releases (mrem/yr)

DR_{skin} = skin dose rate from noble gases in airborne releases (mrem/yr)

\sum_i^n = a mathematical symbol to signify the operations to the right of the symbol are to be performed for each noble gas nuclide (i) through (n) and the individual nuclide doses are summed to arrive at the total dose rate for the release source.

K_i = the total body dose factor due to gamma emissions for each noble gas nuclide reported in the release source. (mrem-m³/μCi-yr)

L_i = the skin dose factor due to beta emissions for each noble gas nuclide (i) reported in the assay of the release source. (mrem-m³/μCi-yr)

M_i = the air dose factor due to gamma emissions for each noble gas nuclide (i) reported in the assay of the release source. The constant 1.1 converts mrad to mrem since the units of M_i are in (mrad-m³/μCi-yr)

(X/Q) = for ground level, the highest calculated annual long term historic relative concentration for any of the 16 sectors, at or beyond the exclusion area boundary (sec/m³)

(Q DOT)_i = The release rate of noble gas nuclide (i) in μCi/sec from the release source of interest

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 100 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. Setpoint Determination

- A. To comply with Control 3.3.3.10, the alarm/trip setpoints are established to ensure that all noble gas releases in progress do not exceed the ODCM Control 3.11.2.1 noble gas release rate limit for the site. Using pre-ODCM Revision 0 data, the total body dose was determined to be more limiting than the calculated skin dose, therefore the site release rate limit of total body dose rate of 500 mrem/yr has been determined to be equivalent to $3.5\text{E}+05$ uCi/sec being released from the site. Using $3.5\text{E}+05$ uCi/sec as the equivalent of 100 percent of the site limit, each release point on site may be allotted a portion of the 100 percent, such that the sum of all release point portions allotted shall be less than or equal to 100 percent. The release point's actual monitor setpoint shall take into account the physical release characteristics of maximum expected volume release rate and its percent allotment for a single release point since uCi/sec is proportional to volume rate. The ODCM actual release points and an example of percent allotments is provided:

Site Limit in Percent = 100%

Site Limit in uCi/sec = $3.5\text{E}+05$ uCi/sec

(Example)

| <u>ODCM Release Point</u> | <u>Percent Allotment</u> |
|---------------------------|--------------------------------------|
| Unit 1 Plant Vent | 40 |
| Unit 1 Fuel Bldg. Vent | 5 |
| ECCS 1A | 1 |
| ECCS 1B | 1 |
| Unit 2 Plant Vent | 40 |
| Unit 2 Fuel Bldg. Vent | 5 |
| ECCS 2A | 1 |
| ECCS 2B | 1 |
| Blowdown Bldg. Vent | + 5 |
| Total Percent Allocated = | 99 or 1 percent below the Site Limit |

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 101 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. (continued)

A. (continued)

More or less percentage may be used for a release point, but the sum of the total percent allocated to the above Release Points shall never be allowed to exceed 100 percent. The ECCS Reactor Auxiliary Building Exhaust are not ODCM required monitored release points, but a small percentage should be allotted to each to cover short periodic fan surveillance runs. This allocation is controlled per Chemistry Procedure CY-SL-104-0112, Determination of Process Radiation Monitor Setpoints where Chemistry Supervisor approval is required. CY-SL-104-0112, Determination of Process Radiation Monitor Setpoints provides calculation steps to calculate a Noble Gas Release Rate Setpoint based on the methodology steps described below. A release point's percent allotment will be converted into the release point's indicating engineering unit of uCi/cc that will be equivalent to the allocated portion of the site limit.

1. Obtain the release point's maximum expected process flow release rate (**V**) in Cubic Feet per Minute (cfm) from the Effluent Supervisor.
2. Obtain the release point's percent of site limit allotment (**PA**) from the Chemistry Supervisor.
3. Substitute the release point's **V** and **PA** values into the below equation(s) to obtain the Release Point's Setpoint (SP) in the desired engineering unit (uCi/cc or uCi/sec).

$$\text{SP} = \frac{3.5\text{E}+05 \text{ uCi}}{\text{sec}} \times \frac{60 \text{ sec}}{\text{min}} \times \frac{\text{min}}{\text{V ft}^3} \times \frac{\text{ft}^3}{28317 \text{ cc}} \times \frac{\text{PA}}{100\%}$$

SP = _____ uCi/cc which is the TABLE 3.3-14 HIGH SETPOINT for ODCM Effluent Gas Channels that have a "Allotted % of Site Limit" declared as their HIGH SETPOINT.

$$\text{SP} = \frac{3.5\text{E}+05 \text{ uCi}}{\text{sec}} \times \frac{\text{PA}}{100\%}$$

$$\text{SP} = \text{_____ uCi/cc}$$

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 102 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. (continued)

A. (continued)

In the case of Unit 2 Plant Vent there are 3 ODCM Effluent Gas Channels Monitoring the Plant Vent. The wide range channel 624 HIGH SETPOINT in uCi/sec is equivalent to 2A PV PIG LOW RANGE GAS and 2B PIG LOW RANGE GAS channel 624 uses the equivalent uCi/sec based on the uCi/cc at the maximum expected process flow rate. Since they are monitoring the same release point (i.e., each of these channels does not receive their own allotted % of the Site Limit).

4. The significance of an ODCM Effluent Gas Channel that has a "Allotted % of Site Limit" HIGH Setpoint requires further discussion (Mid and High Noble Gas Accident Channels are not part of this discussion):
 - a. For Plant Vent Release Points on each reactor unit, the "Allotted % of Site Limit" needs to be high enough to allow for Batch Releases from Gas Decay Tank and Containment Venting Operations, and at the same time CY-SL-102-0105, Processing Gaseous Waste shall provide instruction for administratively controlling Batch Releases such that the radioactive concentration and release rate will not be allowed to exceed the site limit at any time.
 - b. The receipt of a valid HIGH Alarm on a release point where the ODCM Low Range Gas Channel's radioactivity is approximately equal to the HIGH Alarm setpoint does not mean the site limit has been exceeded, rather it is at a concentration that is equivalent to the "Allotted % of Site Limit".

setpoint in uCi/cc V or Vmax ft³/minute vent flow

SP = _____ uCi x 28317 cc x Vmax ft³ x minute

uCi/sec (equivalent) cc ft³ minute 60 second

SP = _____ uCi equivalent to a channel indicating a

(uCi/sec) sec uCi/cc concentration assuming a volume release rate of V or Vmax.

SP = _____ uCi x _____ 100 = _____ %

(% of Site Limit) (above) sec 350,000 uCi/sec of Site Limit

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 104 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. (continued)

A. (continued)

4. (continued)

c. (continued)

A value of $RP_{SL} > 1.0$ or a $F_{SL} > 1.0$ would be exceeding the Site Limit Based on the above estimate. Off Normal Procedure allow 1 hour to obtain a grab sample of the Release Point so that the actual site limit situation may be evaluated. This method is discussed in the following step.

5. To quantify the Release Point's actual Noble Gas Dose Rate, the following would need to be performed:

- a. A Noble Gas Activity Grab Sample would be obtained and analyzed to determine each Noble Gas Isotopic concentration.
- b. The results would be used to perform calculations per ODCM Step 2.2.2 for Noble Gas Total Body Dose Rate and Skin Dose Rate.
- c. If the Release Point's HIGH Alarms were received on the Table 3.3-14 ODCM Related Particulate and/or Iodine Channel, then ODCM Step 2.3 calculations should be performed as soon as possible after the continuous collection medium(s) and a Tritium Sample can be pulled and analyzed to evaluate compliance with ODCM Control 3.11.2.1.b.

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 105 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. (continued)

- B. No Particulate or Iodine Radioactivity Channels are required by the ODCM. Table 3.3-13 requires Iodine and Particulate Samplers only. The ODCM requires a Fuel Building Vent Particulate Channel (the bases for the setpoint on the Fuel Building Vent Particulate Channel is described in 2.2.1.C). The Unit 2 FUSAR does describe Particulate and Iodine Radioactivity Channels. These Channels are listed in ODCM Table 3.3-14 and ALERT and HIGH Setpoints are provided. The intent of providing these setpoints is to provide early warning that the effluent pathway conditions have increased such that a grab sample should be obtained if a HIGH Alarm Setpoint is reached or exceeded. The Particulate and Iodine HIGH Alarm Setpoint bases is that the collection mediums are fixed filter where continuing deposition of radioactivity would cause a increase in the channel count rate up to the setpoint level(s), the resulting dose rate can be shown to be less than 1 percent of the site limit for ODCM Control 3.11.2.1.b for Iodine-131, Iodine-133, and all radionuclides in particulate from with half-lives greater than 8 days, is that these channel detectors are gross activity monitors of the scintillation type where the count rate is not dependent (above threshold) on the energy of the isotope entrained on the collection medium, and that these channels are qualitative trend indicators since the channel count rate cannot be corrected for the accrued sample collection volume. Plant historical trends have shown that Noble Gas Activity may contribute to the count rate of the Reactor Auxiliary Building (Plant) Vent Particulate and Iodine Channel(s). In this event the Noble Gas contribution may be added to the Table 3.3-14 Alert and High Setpoints for Unit 2 Plant Vents only.

The sampling mediums associated with the Particulate and Iodine Channels in Table 3.3-14 are also controlled by the requirements of ODCM Table 4.11-2 which requires 4/M Minimum Analysis Frequency of the sampling mediums. These analysis are used to confirm and quantify the isotopic composition of the radioactivity being monitored by these channels. The presence of Noble Gas on collection medium would be confirmed by these analysis.

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 106 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. (continued)

B. (continued)

If an alarm occurs, Channel Check(s) should be performed on these channel(s), an ALERT Alarm should be investigated and a HIGH Alarm shall require isotopic analysis of particulate and/or iodine channel medium of the affected channel(s). The Isotopic analysis of the medium shall be used to evaluate particulate and/or iodine dose rate levels per the methodology of ODCM 2.3.

C. To comply with the ODCM, Alarm/Trip Setpoints determined and set in accordance with the requirements of the Offsite Dose Calculation Manual, the following is the BASES for Fuel Building Particulate Channel High Alarm Setpoints for Unit 1 and Unit 2:

Unit 1 Fuel Building:

The 10,000 cpm High Setpoint is based on an Infant's Maximum Exposed Organ Dose Rate (Liver) from Inhalation of Cs-137 at the Site Boundary. The value of 10,000 cpm is very conservative relative to the site dose rate limit of 1500 mrem/yr. The methodology is based on measured particulate channel count rates when the detector was calibrated with a known source activity of Cs-137, and on default assumptions as follows:

1. The particulate channel read 32,385 ccpm when exposed to a 7.67 uCi source of Cs-137.
2. Assuming that 7.67 uCi of Cs-137 were collected during 1 hour of skid sample collection (fixed filter), the typical sample volume would yield ~3.3E+06 cc's. Greater than 99% sample filter efficiency is assumed.
3. The maximum building process flow exhaust is ~24,576 cfm.
4. Q(dot) for Cs-137 uCi/sec release rate is approximately 27 uCi/sec as follows:

$$\frac{7.67 \text{ uCi}}{\text{hour}} \times \frac{\text{hour}}{3.3\text{E}+06\text{cc.s}} \times \frac{28317 \text{ cc's}}{\text{ft}^3} \times \frac{24576 \text{ ft}^3}{\text{min}} \times \frac{\text{min}}{60 \text{ sec}} = \frac{27 \text{ uCi}}{\text{sec}}$$

| | | |
|----------------|----------------------------------------|------------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 107 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. (continued)

C. (continued)

5. The default historical (X/Q)_d for the worst sector (NW) at the site boundary is 1.3E-06 meters/sec.

6. The dose rate (equivalent to 10,000 cpm) is calculated per ODCM Section 2.3 Inhalation Dose Rate to an Infant. The resulting dose rates yield.

| Bone | Liver | Thyroid | Kidney | Lung | GI-LLI | W.Body |
|---------|---------|---------|---------|---------|---------|---------|
| mrem/yr | mrem/yr | mrem/yr | mrem/yr | mrem/yr | mrem/yr | mrem/yr |
| 7.4E+00 | 7.9E+00 | 0.0E+00 | 4.2E-01 | 1.0E+00 | 1.5E-02 | 4.8E-01 |

7. The ODCM 3.11.2.1.b dose rate limit to any organ is 1500 mrem/yr. From the preceding calculation the Infant's Liver is the maximum exposed organ at 0.52 percent of the site dose rate limit.

8. A particulate channel setpoint of 10,000 cpm provides a conservative setpoint given that this channel analyzes gross activity on a fixed filter, Cs-137 is a typical long-lived fission product present at all times with spent fuel in the pool, and that sample collection intervals shorter than 1 hour would provide adequate warning response if significant particulate activity were being released, i.e., the above assumptions assume a Cs-137 activity of ~2.3E-06 uCi/cc.

9. The setpoint of 10,000 cpm was administratively chosen to provide early detection/alarm of a problem. The above dose rate calculations are provided to document that the particulate channel is capable of detection sensitivities to insure compliance with the ODCM site limit. Grab samples should be performed to accurately calculate actual releases associated with real high alarm events as per the ODCM methodology for performing dose rate calculations. (End of Unit 1 Fuel Building evaluation)

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 108 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. (continued)

C. (continued)

Unit 2 Fuel Building:

The 10,000 cpm High Setpoint is based on an Infant's Maximum Exposed Organ Dose Rate (Liver) from Inhalation of Cs-137 at the Site Boundary. The value of 10,000 cpm is very conservative relative to the site dose rate limit of 1500 mrem/yr. The methodology is based on measured particulate channel count rates when the detector was calibrated with a known source activity of Cs-137, and on default assumptions as follows:

1. The particulate channel read 39,782 ccpm when exposed to a 7.59 uCi source of Cs-137 (decayed to June 19, 1996 data).
2. Assuming that 7.59 uCi of Cs-137 were collected during 1 hour of skid sample collection (fixed filter), the typical sample volume would yield 4.08E+06 cc's. Greater than 99% sample filter efficiency is assumed.
3. The maximum building process flow exhaust is ~31,584 cfm.
4. Q(dot) for Cs-137 uCi/sec release rate is approximately 21 uCi/sec as follows:

$$\frac{7.59 \text{ uCi}}{\text{hour}} \times \frac{\text{hour}}{4.08\text{E}+06\text{cc.s}} \times \frac{28317 \text{ cc's}}{\text{ft}^3} \times \frac{31584 \text{ ft}^3}{\text{min}} \times \frac{\text{min}}{60 \text{ sec}} = \frac{27.72 \text{ uCi}}{\text{sec}}$$

5. The default historical (X/Q)_d for the worst sector (NW) at the site boundary is 1.3E-06 meters/sec.
6. The dose rate (equivalent to 10,000 cpm) is calculated per ODCM Section 2.3 Inhalation Dose Rate to an Infant. The resulting dose rates yield.

| Bone | Liver | Thyroid | Kidney | Lung | GI-LLI | W.Body |
|----------|----------|---------|----------|----------|---------|----------|
| mrem/yr | mrem/yr | mrem/yr | mrem/yr | mrem/yr | mrem/yr | mrem/yr |
| 6.21E+00 | 6.62E+00 | 0E+00 | 3.52E+00 | 8.56E+00 | 1.2E+00 | 3.99E+00 |

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 109 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

1. (continued)

C. (continued)

7. The ODCM 3.11.2.1.b dose rate limit to any organ is 1500 mrem/yr. From the preceding calculation the Infant's Liver is the maximum exposed organ at 0.34 percent of the site dose rate limit.
8. A particulate channel setpoint of 10,000 cpm provides a conservative setpoint given that this channel analyzes gross activity on a fixed filter, Cs-137 is a typical long-lived fission product present at all times with spent fuel in the pool, and that sample collection intervals shorter than 1 hour would provide adequate warning response if significant particulate activity were being released, i.e., the above assumptions assume a Cs-137 activity of $\sim 1.4\text{E-}06$ uCi/cc.
9. The setpoint of 10,000 cpm was administratively chosen to provide early detection/alarm of a problem. The above dose rate calculations are provided to document that the particulate channel is capable of detection sensitivities to insure compliance with the ODCM site limit. Grab samples should be performed to accurately calculate actual releases associated with real high alarm events as per the ODCM methodology for performing dose rate calculations.

| | | |
|----------------|----------------------------------------|------------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 110 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

2. Total Body and Skin Nuclide Specific Dose Rate Calculations

The following outline provides a step-by-step explanation of how the total body dose rate is calculated on a nuclide-by-nuclide basis to evaluate compliance with Control 3.11.2.1. This method is only used if the actual releases exceed the value of $3.5 \times 10^5 \mu\text{Ci/sec}$.

A. The (X/Q) value = _____ sec/m^3 and _____ is the most limiting sector at the exclusion area. (See Table M-1 for value and sector.)

B. Enter the release rate in ft^3/min of the release source and convert it to:

$$= \left(\frac{\quad}{\text{min}} \right) \text{ft}^3 \times \frac{2.8317 \times 10^4 \text{ cc}}{\text{ft}^3} \times \frac{\text{min}}{60 \text{ sec}}$$

$$= \quad \text{cc/sec volume release rate}$$

C. Solve for $(Q \text{ DOT})_i$ for nuclide (i) by obtaining the $\mu\text{Ci/cc}$ assay value of the release source and multiplying it by the product of 2.2.2.B above.

$$(Q \text{ DOT})_i = (\text{nuclide [i]})$$

$$\frac{(\text{assay}) \mu\text{Ci}}{\text{cc}} \times \frac{(2.2.2.B \text{ value}) \text{cc}}{\text{sec}}$$

$$(Q \text{ DOT})_i = \quad \mu\text{Ci/sec for nuclide (i)}$$

D. To evaluate the total body dose rate obtain the K_i value for nuclide (i) from Table G-2.

E. Solve for DR_{TBI}

$$DR_{\text{TBI}} = K_i (X/Q) (Q \text{ DOT})_i = \frac{\text{mrem} \cdot \text{m}^3}{\mu\text{Ci} \cdot \text{yr}} \times \frac{\text{sec}}{\text{m}^3} \times \frac{\mu\text{Ci}}{\text{sec}}$$

$$DR_{\text{TBI}} = \frac{\text{mrem}}{\text{yr}} \quad \text{total body dose from nuclide (i) for the specified release source}$$

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 111 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.2 Determining the Total Body and Skin Dose Rates for Noble Gas Releases And Establishing Setpoints for Effluent Monitors (continued)

2. (continued)

F. To evaluate the skin dose rate, obtain the L_i and M_i values from Table G-2 for nuclide (i).

G. Solve for $DR_{skin\ i}$

$$DR_{skin\ i} = [L_i + 1.1 M_i] (X/Q)(Q \text{ DOT})_i$$

$$DR_{skin\ i} = \frac{\text{mrem}}{\text{yr}} \text{ skin dose from nuclide (i) for the specified release source}$$

H. Repeat steps 2.2.2.D through 2.2.2.G for each noble gas nuclide (i) reported in the assay of the release source.

I. The Dose Rate to the Total Body from radioactive noble gas gamma radiation from the specified release source is:

$$DR_{TB} = \sum_i^n DR_{TBi}$$

J. The Dose Rate to the skin from noble gas radiation from the specified release source is:

$$DR_{skin} = \sum_i^n DR_{skin\ i}$$

The dose rate contribution of this release source shall be added to all other gaseous release sources that are in progress at the time of interest. Refer to in-plant procedures and logs to determine the Total Dose Rate to the Total Body and Skin from noble gas effluents.

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 112 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases

Discussion - Control 3.11.2.1 limits the dose rate from I-131, I-133, tritium and all radionuclides in particulate form with half lives >eight days to ≤ 1500 mrem/yr to any organ. The following calculation method is provided for determining the dose rate from radioiodines (see 2.1) and particulates and is based on Section 5.2.1 and 5.2.1.1 through 5.2.1.3 in NUREG-0133, November 1978. The Infant is the controlling age group in the inhalation, ground plane and cow/goat milk pathways, which are the only pathways considered for releases. The long term $(X/Q)_D$ (depleted) and (D/Q) values are based on historical MET data prior to implementing Appendix I. Only those nuclides that appear on their respective table will be considered. The equations are:

For Inhalation Pathway (excluding H-3):

$$DR_{I\&8DPT} = \sum_i^n R_i^* (X/Q)_D (Q \text{ DOT})_i$$

For Ground Plane:

$$DR_{I\&8DPT} = \sum_i^n P_i (D/Q)(Q \text{ DOT})_i$$

For Grass-Cow/Goat-Milk:

$$DR_{I\&8DPT} = \sum_i^n R_i^* (D/Q)(Q \text{ DOT})_i$$

For Tritium Releases (Inhalation & Grass-Cow/Goat-Milk):

$$DR_{H3T} = R_{H-3T}^* (X/Q)_D (Q \text{ DOT})_{H-3}$$

* Normally should be P_{iT} , but R_{iT} values are the same, thus use R_{iT} tables in Appendix A.

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 113 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

For Total Dose Rate from I & 8DP and H-3 To An Infant Organ T:

$$DR_T = \sum_z [DR_{I\&8DP_T} + DR_{H-3_T}]$$

Where:

T = The organ of interest for the infant age group

z = The applicable pathways

$DR_{I\&8DP_T}$ = Dose Rate in mrem/yr to the organ T from iodines and 8 day particulates

DR_{H-3_T} = Dose Rate in mrem/yr to organ T from Tritium

DR_T = Total Dose Rate in mrem/yr to organ T from all pathways under consideration

\sum_i^n = A mathematical symbol to signify the operations to the right of the symbol are to be performed for each nuclide (i) through (n) and the individual nuclide dose rates are summed to arrive at the total dose rate from the pathway.

\sum_z = A mathematical symbol to indicate that the total dose rate D_T to organ T is the sum of each of the pathways dose rates

R_i = The dose factor for nuclide (i) for organ T for the pathway specified (units vary by pathway)

P_i = The dose factor for instantaneous ground plane pathway in units of $\frac{\text{mrem-m}^2 \text{ sec}}{\mu\text{Ci-yr}}$

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 114 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

From an evaluation of the radioactive releases and environmental pathways, the grass-cow/goat-milk pathway has been identified as the most limiting pathway with the infant's thyroid being the critical organ. This pathway typically contributes >90% of the total dose received by the infant's thyroid and the radioiodine contribute essentially all of this dose. Therefore, it is possible to demonstrate compliance with the release rate limit of Control 3.11.2.1 for radioiodines and particulates by only evaluating the infant's thyroid dose for the release of radioiodines via the grass-cow/goat-milk pathway. The calculation method of Section 2.3.3 is used for this determination. If this limited analysis approach is used, the dose calculations for other radioactive particulate matter and other pathways need not be performed. Only the calculations of Section 2.3.3 for the radioiodines need be performed to demonstrate compliance with the Control dose rate limit.

The calculations of Sections 2.3.1, 2.3.2, 2.3.4 and 2.3.5 may be omitted. The dose rate calculations as specified in these sections are included for completeness and are to be used only for evaluating unusual circumstances where releases of particulate materials other than radioiodines in airborne releases are abnormally high. The calculations of Sections 2.3.1, 2.3.2, 2.3.4 and 2.3.5 will typically be used to demonstrate compliance with the dose rate limit of Control 3.11.2.1 for radioiodines and particulates when the measured releases of particulate material (other than radioiodines and with half lives >8 days) are >10 times the measured releases of radioiodines.

1. The Inhalation Dose Rate Method:

NOTE

The H-3 dose is calculated as per 2.3.4.

- A. The controlling location is assumed to be an Infant located in the _____ sector at the _____ mile range. The $X/Q)_D$ for this location is _____ sec/m^3 . This value is common to all nuclides. (See Table M-2 for value, sector and range.)
- B. Enter the release rate in ft^3/min of the release source and convert to cc/sec .

$$= \frac{\text{ft}^3}{\text{min}} \times \frac{2.8317 \times 10^4 \text{ cc}}{\text{ft}^3} \times \frac{\text{min}}{60 \text{ sec}} = \text{cc}/\text{sec}$$

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 115 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

1. (continued)

- C. Solve for $(Q\text{ DOT})_i$ for nuclide (i) by obtaining the $\mu\text{Ci/cc}$ assay value of the release source activity and multiplying it by the product of 2.3.1.B above.

$$(Q\text{ DOT})_i = \frac{(\text{nuclide}[i] \text{ assay}) \mu\text{Ci}}{\text{cc}} \times \frac{(\text{Value 2.3.1.B}) \text{cc}}{\text{sec}}$$

$$(Q\text{ DOT})_i = \mu\text{Ci/sec for nuclide (i)}$$

- D. Obtain the R_i value from Table G-5 for the organ T.

- E. Solve for DR_i

$$DR_{iT} = R_{iT} (X/Q)_D (Q\text{ DOT})_i = \frac{\text{mrem} \cdot \text{m}^3}{\mu\text{Ci} \cdot \text{yr}} \times \frac{\text{sec}}{\text{m}^3} \times \frac{\mu\text{Ci}}{\text{sec}}$$

$$DR_{iT} = \frac{\text{mrem}}{\text{yr}} \quad \text{The Dose Rate to organ T from nuclide (i)}$$

- F. Repeat steps 2.3.1.C through 2.3.1.E for each nuclide (i) reported in the assay of the release source.
- G. The Dose Rate to the Infants organ T from the Inhalation Pathway is:

$$DR_{\text{Inhalation T}} = DR_1 + DR_2 + \dots + DR_n$$

for all nuclides except H-3. This dose rate shall be added to the other pathways as per 2.3.5 - Total Organ Dose.

NOTE

Steps 2.3.1.C through 2.3.1.G need to be completed for each organ T of the Infant.

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 116 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

2. The Ground Plane Dose Rate Method:

NOTE

Tritium dose via the ground plane is zero.

- A. The controlling location is assumed to be an Infant located in the _____ sector at the _____ mile range. The (D/Q) for this location is _____ 1/m². This value is common to all nuclides. (See Table M-2 for sector, range and value.)

- B. Enter the release rate in ft³/min of the release source and convert to cc/sec.

$$= \frac{\text{ft}^3}{\text{min}} \times \frac{2.8317 \times 10^4 \text{ cc}}{\text{ft}^3} \times \frac{\text{min}}{60 \text{ sec.}} = \text{cc/sec}$$

- C. Solve for (Q DOT)_i for nuclide (i) by obtaining the μCi/cc assay value from the release source activity and multiplying it by the product of 2.3.2.B above.

$$(\text{Q DOT})_i = \frac{(\text{nuclide}[i] \text{ assay}) \mu\text{Ci}}{\text{cc}} \times \frac{(\text{Value 2.3.2.B}) \text{cc}}{\text{sec}}$$

$$(\text{Q DOT})_i = \mu\text{Ci/sec for nuclide (i)}$$

- D. Obtain the P_i value from Table G-3

- E. Solve for DR_i

$$\text{DR}_i = P_{\text{ir}} (\text{D/Q}) (\text{Q DOT})_i = \frac{\text{mrem} \cdot \text{m}^2 \cdot \text{sec}}{\mu\text{Ci} \cdot \text{yr}} \times \frac{1}{\text{m}^2} \times \frac{\mu\text{Ci}}{\text{sec}}$$

$$\text{DR}_i = \frac{\text{mrem}}{\text{yr}} \quad \text{The Dose Rate to organ T from nuclide (i)}$$

- F. Repeat steps 2.3.2.C through 2.3.2.E for each nuclide (i) reported in the assay of the release source.

| | | |
|--------------------------------|-------------------------------------------------------------------|----------------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 117 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

2. (continued)

- G. The Dose Rate to the Infant's Whole Body from the Ground Plane Pathway is:

$$DR_{Gr PI} = DR_1 + DR_2 + \underline{\hspace{2cm}} + DR_n$$

for all nuclides. This dose rate shall be added to the other pathways as per 2.3.5.

3. The Grass-Cow/Goat-Milk Dose Rate Method:

NOTE

H-3 dose is calculated as per 2.3.4.

- A. The controlling animal was established as a _____ located in the _____ sector at _____ miles. The (D/Q) for this location is _____ 1/m². This value is common to all nuclides. (See Table M-3 for sector, range and value.)

- B. Enter the anticipated release rate in ft³/min of the release source and convert to cc/sec.

$$= \frac{\text{ft}^3}{\text{min}} \times \frac{2.8317 \times 10^4 \text{ cc}}{\text{ft}^3} \times \frac{\text{min}}{60 \text{ sec.}} = \text{cc/sec}$$

- C. Solve for (Q DOT)_i for nuclide (i) by obtaining the μCi/cc assay value of the release source activity and multiplying it by the product of 2.3.3.B above.

$$(Q DOT)_i = \frac{(\text{nuclide}[i] \text{ assay}) \mu\text{Ci}}{\text{cc}} \times \frac{(\text{value 2.3.3.B}) \text{cc}}{\text{sec}}$$

$$(Q DOT)_i = \mu\text{Ci/sec for nuclide (i)}$$

- D. Obtain the R_i value from Table G-6(7) (whichever is the controlling animal, cow/goat, for infant).

If the limited analysis approach is being used, limit the calculation to the infant thyroid.

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 118 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

3. (continued)

E. Solve for DR_{iT}

$$DR_{iT} = R_{iT} (D/Q) (Q \text{ DOT})_i = \frac{\text{mrem} - \text{m}^2 - \text{sec}}{\mu\text{Ci} - \text{yr}} \times \frac{1}{\text{m}^2} \times \frac{\mu\text{Ci}}{\text{sec}}$$

$DR_{iT} =$ mrem the Dose Rate to organ T from nuclide (i)
yr

F. Repeat steps 2.3.3.C through 2.3.3.E for each nuclide (i) reported in the assay of the release source.

Only the radioiodines need to be included if the limited analysis approach is being used.

G. The Dose Rate to the Infant's organ T from Grass-_____Milk pathway is:

$$DR_{\text{grass-_____Milk}_T} = DR_1 + DR_2 + \text{_____} + DR_n$$

for all nuclides. This dose rate shall be added to the other pathways as per 2.3.5 - Total Organ Dose.

NOTE

Steps 2.3.3.C through 2.3.3.G need to be completed for each organ of the Infant. Limit the calculation to the infant thyroid if the limited analysis approach is being used.

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 119 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

4. The H-3 Dose Rate Method:

- A. The controlling locations and their $(X/Q)_D$ values for each pathway are:

Inhalation - Infant at _____ range in the _____ sector.

$(X/Q)_D =$ _____ sec/m^3 (See Table M-2 for range, sector and value)

Ground Plane - Does not apply to H-3

Grass-Cow/Goat-Milk-_____ located in the _____ sector at _____ miles with an Infant at the exclusion area in the _____ sector drinking the milk. The $(X/Q)_D$ for the _____ location is $(X/Q)_D =$ _____ sec/m^3 . (From Table M-6 at the range and sector corresponding to the location of the Milk Animal above.)

- B. Enter the anticipated release rate in ft^3/min of the release source and convert it to cc/sec .

$$= \frac{\text{ft}^3}{\text{min}} \times \frac{2.8317 \times 10^4 \text{ cc}}{\text{ft}^3} \times \frac{\text{min}}{60 \text{ sec.}}$$

= _____ cc/sec volume release rate

- C. Solve for $(Q \text{ DOT})_{H-3}$ for Tritium, by obtaining the $\mu\text{Ci}/\text{cc}$ assay value of the release source and multiplying it by the product of 2.3.4.B above.

$$(Q \text{ DOT})_{H-3} = \frac{(H-3) \mu\text{Ci}}{\text{cc}} \times \frac{(2.3.4.B \text{ value}) \text{ cc}}{\text{sec}}$$

$(Q \text{ DOT})_{H-3} =$ _____ $\mu\text{Ci}/\text{sec}$ activity release rate

- D. Obtain the Tritium dose factor (R_i) for Infant organ T from:

| PATH | TABLE # |
|---------------------|---------|
| Inhalation | G-5 |
| Grass-Cow/Goat-Milk | G-6(7) |

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 120 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

4. (continued)

- E. Solve for D_{H-3} (Inhalation) using the $(X/Q)_D$ for inhalation from 2.3.4.A and R_{H-3} (Inhalation) from 2.3.4.D.

$$DR_{H-3_{InhT}} = R_{H-3} (X/Q)_D (Q \text{ DOT})_{H-3}$$

$$DR_{H-3_{InhT}} = \text{mrem/yr from H - 3 Infant Inhalation for organ T}$$

- F. Solve for D_{H-3} (Grass-_____-Milk) using the $(X/Q)_D$ for Grass-_____-Milk from 2.3.4.A and R_{H-3} (Grass-_____-Milk) from 2.3.4.D

$$DR_{H-3G- MT} = R_{H-3G- MT} (X/Q)_D (Q \text{ DOT})_{H-3}$$

$$DR_{H-3G- MT} = \text{mrem/yr from H - 3 Infant}$$

- G. Repeat steps 2.3.4.D through 2.3.4.F for each Infant organ T of interest.
- H. The individual organ dose rates from H-3 shall be added to the other organ pathway dose rates as per 2.3.5.

| | | |
|----------------|----------------------------------------|------------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 121 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

METHODOLOGY SECTION

2.3 Determining the Radioiodine & Particulate Dose Rate to Any Organ From Gaseous Releases (continued)

5. Determining the Total Organ Dose Rate from Iodines, 8D-Particulates, and H-3 from Release Source(s)

- A. The following table describes all the pathways that must be summed to arrive at the total dose rate to an organ T:

| PATHWAY | DOSE RATE | STEP # REF. |
|----------------------|-------------------|-------------|
| Inhalation (I&8DP) | | 2.3.1.G |
| Ground Plane (I&8DP) | (Whole Body only) | 2.3.2.G |
| Gr-_____Milk (I&8DP) | | 2.3.3.G |
| Inhalation (H-3) | | 2.3.4.E |
| Gr-_____Milk (H-3) | | 2.3.4.F |
| DR _T = | (sum of above) | |

- B. Repeat the above summation for each Infant organ T.
- C. The DR_T above shall be added to all other release sources on the site that will be in progress at any instant. Refer to in-plant procedures and logs to determine the Total DR_T to each organ.

2.4 Determining the Gamma Air Dose for Radioactive Noble Gas Release Source(s)

Discussion - Control 3.11.2.2 limits the air dose due to noble gases in gaseous effluents for gamma radiation to <5 mrad for the quarter and to <10 mrad in any calendar year. The following calculation method is provided for determining the noble gas gamma air dose and is based on section 5.3.1 of NUREG-0133, November 1978. The dose calculation is independent of any age group. The equation may be used for Control dose calculation, the dose calculation for the annual report or for projecting dose, provided that the appropriate value of (X/Q) is used as outlined in the detailed explanation that follows. The equation for gamma air dose is:

$$D_Y - \text{air} = \sum_i^n 3.17 \times 10^{-8} M_i (X/Q) Q_i$$

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 122 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.4 Determining the Gamma Air Dose for Radioactive Noble Gas Release Source(s) (continued)

Where:

$D_{\gamma\text{-air}}$ = gamma air dose in mrad from radioactive noble gases.

Σ = A mathematical symbol to signify the operations to the right side of the symbol are to be performed for each nuclide (i) through (n) and summed to arrive at the total dose, from all nuclides reported during the interval. No units apply.

3.17×10^{-8} = the inverse of the number of seconds per year with units of year/sec.

M_i = the gamma air dose factor for radioactive noble gas nuclide (i) in units of $\frac{\text{mrad-m}^3}{\mu\text{Ci-yr}}$

(X/Q) = the long term atmospheric dispersion factor for ground level releases in units of sec/m^3 . The value of (X/Q) is the same for all nuclides (i) in the dose calculation, but the value of (X/Q) does vary depending on the Limiting Sector the Control is based on, etc.

Q_i = the number of micro-curies of nuclide (i) released (or projected) during the dose calculation exposure period. (e.g., month, quarter or year)

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 123 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.4 Determining the Gamma Air Dose for Radioactive Noble Gas Release Source(s) (continued)

The following steps provide a detailed explanation of how the radionuclide specific dose is calculated.

1. To determine the applicable (X/Q) refer to Table M-1 to obtain the value for the type of dose calculation being performed. (i.e., Quarterly Control or Dose Projection for examples). This value of (X/Q) applies to each nuclide (i).
2. Determine (M_i) the gamma air dose factor for nuclide (i) from Table G-2.
3. Obtain the micro-Curies of nuclide (i) from the in-plant radioactive gaseous waste management logs for the sources under consideration during the time interval.

4. Solve for D_i as follows:

$$D_i = \frac{3.17 \times 10^{-8} \text{ yr}}{\text{sec}} \times \frac{M_i \text{ mrad} \cdot \text{m}^3}{\mu\text{Ci} \cdot \text{yr}} \times \frac{(X/Q) \text{ sec}}{\text{m}^3} \times \frac{Q_i \mu\text{Ci}}{1}$$

$D_i = \text{mrad} = \text{the dose from nuclide (i)}$

5. Perform steps 2.4.2 through 2.4.4 for each nuclide (i) reported during the time interval in the source.
6. The total gamma air dose for the pathway is determined by summing the D_i dose of each nuclide (i) to obtain $D_{Y\text{-air}}$ dose.

$$D_{Y\text{-air}} = D_1 + D_2 + \text{_____} + D_n = \text{mrad}$$

7. Refer to in-plant procedures for comparing the calculated dose to any applicable limits that might apply.

| | | |
|----------------|----------------------------------------|------------|
| REVISION NO.: | PROCEDURE TITLE: | PAGE: |
| 55 | OFFSITE DOSE CALCULATION MANUAL (ODCM) | 124 of 232 |
| PROCEDURE NO.: | ST. LUCIE PLANT | |
| C-200 | | |

METHODOLOGY SECTION

2.5 Determining the Beta Air Dose for Radioactive Noble Gas Releases

Discussion - Control 3.11.2.2 limits the quarterly air dose due to beta radiation from noble gases in gaseous effluents to <10 mrad in any calendar quarter and <20 mrad in any calendar year. The following calculation method is provided for determining the beta air dose and is based on Section 5.3.1 of NUREG-0133, November 1978. The dose calculation is independent of any age group. The equation may be used for Control dose calculation, dose calculation for annual reports or for projecting dose, provided that the appropriate value of (X/Q) is used as outlined in the detailed explanation that follows.

The equation for beta air dose is:

$$D_{B-air} = \sum_i^n 3.17 \times 10^{-8} N_i (X/Q) Q_i$$

Where:

D_{B-air} = beta air dose in mrad from radioactive noble gases.

\sum_i^n = a mathematical symbol to signify the operations to the right side of the symbol are to be performed for each nuclide (i) through (n) and summed to arrive at the total dose, from all nuclides reported during the interval. No units apply.

3.17×10^{-8} = the inverse of the number of seconds per year with units of year/sec.

N_i = the beta air dose factor for radioactive noble gas nuclide (i) in units of $\frac{\text{mrad-m}^3}{\mu\text{Ci-yr}}$

(X/Q) = the long term atmospheric dispersion factor for ground level releases in units of sec/m^3 . The value of (X/Q) is the same for all nuclides (i) in the dose calculation, but the value of (X/Q) does vary depending on the Limiting Sector the Control is based on, etc.

Q_i = the number of micro-Curies of nuclide (i) released (or projected) during the dose calculation exposure period

| | | |
|-------------------------|------------------------------------------------------------|---------------------|
| REVISION NO.: 55 | PROCEDURE TITLE: OFFSITE DOSE CALCULATION MANUAL (ODCM) | PAGE: 125 of 232 |
| PROCEDURE NO.: C-200 | ST. LUCIE PLANT | |

METHODOLOGY SECTION

2.5 Determining the Beta Air Dose for Radioactive Noble Gas Releases (continued)

The following steps provide a detailed explanation of how the dose is calculated.

1. To determine the applicable (X/Q) refer to Table M-1 to obtain the value for the type of dose calculation being performed (i.e., quarterly Control or Dose projection for examples). This value of (X/Q) applies to each nuclide (i).
2. Determine (N_i) the beta air dose factor for nuclide (i) from Table G-2.
3. Obtain the micro-curies of nuclide (i) from the in-plant radioactive gaseous waste management logs for the source under consideration during the time interval.

4. Solve for D_i as follows:

$$D_i = \frac{3.17 \times 10^{-8} \text{ yr}}{\text{sec}} \times \frac{N_i \text{ mrad} \cdot \text{m}^3}{\mu\text{Ci} \cdot \text{yr}} \times \frac{(X/Q) \text{ sec}}{\text{M}^3} \times \frac{Q_i \mu\text{Ci}}{1}$$

$D_i = \text{mrad} = \text{the dose from nuclide (i)}$

5. Perform steps 2.5.2 through 2.5.4 for each nuclide (i) reported during the time interval in the release source.
6. The total beta air dose for the pathway is determined by summing the D_i dose of each nuclide (i) to obtain $D_{B\text{-air}}$ dose.

$$D_{B\text{-air}} = D_1 + D_2 \text{ _____ } + D_n = \text{mrad}$$

7. Refer to in-plant procedures for comparing the calculated dose to any applicable limits that might apply.