



KEVIN M. ELLIS
General Manager

**Nuclear Regulatory Affairs, Policy &
Emergency Preparedness**

13225 Hagers Ferry Rd., MG011E
Huntersville, NC 28078

843-951-1329
Kevin.Ellis@duke-energy.com

Serial: RA-25-0095
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10 CFR 50.36a

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

Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324

Catawba Nuclear Station, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. NPF-35 and NPF-52
Docket Nos. 50-413 and 50-414

Shearon Harris Nuclear Power Plant, Unit 1
Renewed Facility Operating License No. NPF-63
Docket No. 50-400

McGuire Nuclear Station, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. NPF-9 and NPF-17
Docket Nos. 50-369 and 50-370

Oconee Nuclear Station, Unit Nos. 1, 2 and 3
Renewed Facility Operating License Nos. DPR-38, DPR-47 and DPR-55
Docket Nos. 50-269, 50-270 and 50-287

H. B. Robinson Steam Electric Plant, Unit 2
Renewed Facility Operating License No. DPR-23
Docket No. 50-261

SUBJECT: Annual Radioactive Effluent Release Report - 2024

Ladies and Gentlemen:

Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively referred to as Duke Energy), in accordance with 10 CFR 50.36a and Technical Specification (TS) 5.6.3 for Brunswick Steam Electric Plant Units 1 and 2 (BNP), TS 5.6.3 and Selected Licensing Commitment (SLC) 16.11-16 for Catawba Nuclear Station Units 1 and 2 (CNS), TS 6.9.1.4 for Shearon Harris Nuclear Power Plant Unit 1 (HNP), TS 5.6.3 and SLC 16.11.17 for McGuire Nuclear Station Units 1 and 2 (MNS), TS 5.6.3 and SLC 16.11.9 for Oconee Nuclear Station Units 1, 2, and 3 (ONS), and TS 5.6.3 for H. B. Robinson Steam Electric Plant Unit 2 (RNP), is submitting the Annual Radioactive Effluent Release Reports (ARERRs) for the period from January 1, 2024, through December 31, 2024. The ARERRs are provided in Enclosures 1 through 6.

BNP TS 5.5.1, "Offsite Dose Calculation Manual (ODCM)," requires changes to the ODCM be submitted as part of, or concurrent with, the Radioactive Effluent Release Report. The ODCM was not revised during this report period.

CNS TS 5.5.1, "Offsite Dose Calculation Manual (ODCM)," requires changes to the ODCM be submitted as part of, or concurrent with, the Radioactive Effluent Release Report. The ODCM was not revised during this report period.

HNP TS 6.14, "Offsite Dose Calculation Manual (ODCM)," requires changes to the ODCM be submitted as part of, or concurrent with, the Radioactive Effluent Release Report. ODCM Revision 30 was implemented in 2024 and is included with this submittal.

MNS TS 5.5.1, "Offsite Dose Calculation Manual (ODCM)," requires changes to the ODCM be submitted as part of, or concurrent with, the Radioactive Effluent Release Report. ODCM Revision 63 was implemented in 2024 and is included with this submittal.

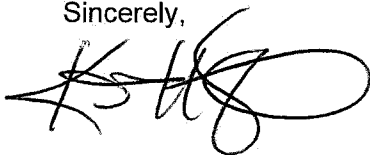
ONS TS 5.5.1, "Offsite Dose Calculation Manual (ODCM)," requires changes to the ODCM be submitted as part of, or concurrent with, the Radioactive Effluent Release Report. ODCM Revision 63 was implemented in 2024 and is included with this submittal.

RNP TS 5.5.1, "Offsite Dose Calculation Manual (ODCM)," requires changes to the ODCM be submitted as part of, or concurrent with, the Radioactive Effluent Release Report. The ODCM was not revised during this report period but has been included with this submittal.

No regulatory commitments are contained in this submittal.

Please refer any questions concerning this letter and its enclosures to Ryan Treadway, Director, Nuclear Fleet Licensing, at (980) 373-5873.

Sincerely,

A handwritten signature in black ink, appearing to be 'KE Ellis', with a large, stylized loop at the end.

Kevin Ellis
General Manager, Nuclear Regulatory Affairs, Policy & Emergency Preparedness

Enclosures:

1. BNP Annual Radioactive Effluent Release Report
2. CNS Annual Radioactive Effluent Release Report
3. HNP Annual Radioactive Effluent Release Report
4. MNS Annual Radioactive Effluent Release Report
5. ONS Annual Radioactive Effluent Release Report
6. RNP Annual Radioactive Effluent Release Report

cc: (all Enclosures unless specified)

USNRC, Region II Regional Administrator
USNRC NRR Project Manager for BNP
USNRC NRR Project Manager for CNS
USNRC NRR Project Manager for HNP
USNRC NRR Project Manager for MNS
USNRC NRR Project Manager for ONS
USNRC NRR Project Manager for RNP
USNRC Senior Resident Inspector for BNP
USNRC Senior Resident Inspector for CNS
USNRC Senior Resident Inspector for HNP
USNRC Senior Resident Inspector for MNS
USNRC Senior Resident Inspector for ONS
USNRC Senior Resident Inspector for RNP

Enclosure 1

General Counsel to Chair of NC Utilities Commission (swatson@ncuc.net)

Enclosure 6

SC Attorney General (HKirkland@scag.gov)

Enclosure 1, 3, and 4

L. Brayboy (Louis.Brayboy@dhhs.nc.gov), NC DHHS, Radiation Protection Section

P. D. Cox (patrick.cox@dhhs.nc.gov), NC DHHS, Environmental Program

Enclosures 2, 5, and 6

S. Jackson (Jacksosb@dhhs.sc.gov), SC DHEC, Division of Analytical and Radiological Environmental Services

R. Brewer (brewerre@dhhs.sc.gov), SC DHEC, Division of Analytical and Radiological Environmental Services

L. Berresford (berresjl@dhhs.sc.gov), SC DHEC, Site Assessment, Remediation, and Revitalization Division, State Voluntary Cleanup Program

L. Garner (garnerld@dhhs.sc.gov), SC DHEC, Division of Waste Management, Radioactive & Infectious Waste Management

A. Nair (nairgia@dhhs.sc.gov), SC DHEC, Division of Emergency Response

bcc: (all Enclosures unless specified)

Kevin Ellis
Cecil Fletcher
Ryan Treadway
Melissa Stratton
David Cummings
Tracey LeRoy
File: (Corporate)
Electronic Licensing Library (ELL)

Enclosure 1

John Krakuszeski
Mark DeWire

Enclosure 2

Nicole Flippin
Scott Milton
Piedmont Municipal Power Agency (Catawba_RegulatoryDox@pmpa.com)
North Carolina Electric Membership Corporation (Catawba.Manager@ncemcs.com)
North Carolina Municipal Power Agency No. 1 (CatawbaContracts@electricities.org)

Enclosure 3

Tom Haaf
William Gunter

Enclosure 4

Ed Pigott
Travis Rollins

Enclosure 5

Steve Snider
David Wilson

Enclosure 6

Laura Basta
Phillip Mason

Enclosure 1
RA-25-0095

ENCLOSURE 1: BNP Annual Radioactive Effluent Release Report



Brunswick Steam Electric Plant Units 1 and 2

Annual Radioactive Effluent Release Report

January 1, 2024 through December 31, 2024

Dockets 50-325 and 50-324



Introduction

The Annual Radioactive Effluent Release Report is pursuant to Brunswick Steam Electric Plant Technical Specification 5.6.3 and ODCM Specification 7.4.2. The below listed attachments to this report provide the required information. In addition, if a revision to the ODCM has occurred during the report period, it is included pursuant to Brunswick Steam Electric Plant Technical Specification 5.5.1.

Attachment 1	Summary of Gaseous and Liquid Effluents
Attachment 2	Supplemental Information
Attachment 3	Solid Radioactive Waste Disposal
Attachment 4	Meteorological Data
Attachment 5	Unplanned Offsite Releases
Attachment 6	Assessment of Radiation Dose from Radioactive Effluents to Members of the Public
Attachment 7	Information to Support the NEI Ground Water Protection Initiative
Attachment 8	Inoperable Equipment
Attachment 9	Summary of Changes to the Offsite Dose Calculation Manual
Attachment 10	Summary of Changes to the Process Control Program
Attachment 11	Summary of Major Modifications to the Radioactive Waste Treatment Systems
Attachment 12	Errata to a Previous Year's ARERR

Attachment 1
Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 1

Summary of Gaseous and Liquid Effluents

This attachment includes a summary of the quantities of radioactive liquid and gaseous effluents as outlined in Regulatory Guide 1.21, Appendix B.

Attachment 1

Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Summation of All Releases

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
1. Total Release	Ci	3.25E+02	2.40E+02	2.35E+02	3.03E+02	1.10E+03
2. Avg. Release Rate	µCi/sec	4.13E+01	3.05E+01	2.96E+01	3.81E+01	3.49E+01
B. Iodine-131						
1. Total Release	Ci	2.14E-02	2.67E-02	1.72E-02	2.09E-02	8.62E-02
2. Avg. Release Rate	µCi/sec	2.72E-03	3.39E-03	2.17E-03	2.63E-03	2.73E-03
C. Particulates Half-Life ≥ 8 days						
1. Total Release	Ci	5.79E-03	4.96E-03	1.75E-03	3.50E-03	1.60E-02
2. Avg. Release Rate	µCi/sec	7.36E-04	6.31E-04	2.20E-04	4.40E-04	5.06E-04
D. Tritium						
1. Total Release	Ci	1.85E+01	2.00E+01	1.12E+01	9.92E+00	5.96E+01
2. Avg. Release Rate	µCi/sec	2.35E+00	2.55E+00	1.41E+00	1.25E+00	1.89E+00
E. Carbon-14						
1. Total Release	Ci	4.73E+00	5.80E+00	5.93E+00	5.48E+00	2.19E+01
2. Avg. Release Rate	µCi/sec	6.01E-01	7.38E-01	7.46E-01	6.90E-01	6.94E-01
F. Gross Alpha						
1. Total Release	Ci	1.01E-08	0.00E+00	0.00E+00	0.00E+00	1.01E-08

Attachment 1 Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Elevated Releases - Continuous Mode

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
Ar-41	Ci	2.44E+00	1.60E+00	2.49E-01	8.27E-01	5.12E+00
Kr-85m	Ci	5.42E+01	3.62E+01	3.96E+01	4.61E+01	1.76E+02
Kr-85	Ci	0.00E+00	7.09E+00	0.00E+00	1.19E+01	1.90E+01
Kr-87	Ci	6.28E+00	3.86E+00	4.45E+00	6.07E+00	2.07E+01
Kr-88	Ci	5.08E+01	3.46E+01	3.81E+01	4.51E+01	1.69E+02
Xe-133	Ci	5.91E+01	4.24E+01	4.81E+01	4.83E+01	1.98E+02
Xe-135m	Ci	2.71E+01	1.58E+01	1.73E+01	2.03E+01	8.05E+01
Xe-135	Ci	1.97E+01	1.40E+01	1.28E+01	1.68E+01	6.33E+01
Xe-137	Ci	0.00E+00	2.06E+01	1.30E+01	1.22E+01	4.58E+01
Xe-138	Ci	6.07E+01	3.93E+01	4.99E+01	5.35E+01	2.03E+02
Total for Period	Ci	2.80E+02	2.15E+02	2.23E+02	2.61E+02	9.79E+02
B. Iodines						
I-131	Ci	9.35E-03	1.48E-02	1.41E-02	8.95E-03	4.72E-02
I-133	Ci	6.03E-02	1.02E-01	9.35E-02	5.20E-02	3.08E-01
I-135	Ci	7.45E-02	1.30E-01	1.06E-01	6.11E-02	3.72E-01
Total for Period	Ci	1.44E-01	2.47E-01	2.14E-01	1.22E-01	7.27E-01
C. Particulates Half-Life ≥ 8 days						
Mn-54	Ci	0.00E+00	0.00E+00	0.00E+00	8.98E-06	8.98E-06
Co-58	Ci	0.00E+00	0.00E+00	1.02E-05	0.00E+00	1.02E-05
Co-60	Ci	8.87E-06	4.99E-06	8.05E-06	4.03E-05	6.22E-05
Sr-89	Ci	1.11E-04	1.13E-04	1.87E-04	1.19E-04	5.30E-04
Sr-90	Ci	5.45E-08	1.48E-06	1.97E-08	0.00E+00	1.55E-06
Cs-136	Ci	0.00E+00	1.07E-06	0.00E+00	0.00E+00	1.07E-06
Ba-140	Ci	3.51E-04	2.45E-04	2.99E-04	2.39E-04	1.13E-03
La-140	Ci	6.40E-04	4.09E-04	5.36E-04	4.10E-04	2.00E-03
Total	Ci	1.11E-03	7.75E-04	1.04E-03	8.16E-04	3.74E-03
Tritium						
D. H-3	Ci	1.68E+00	2.60E+00	2.94E+00	1.37E+00	8.59E+00
Carbon-14						
E. C-14	Ci	1.89E+00	2.32E+00	2.37E+00	2.19E+00	8.77E+00
Gross Alpha						
F. Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 1 **Summary of Gaseous and Liquid Effluents**

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Elevated Releases - Batch Mode *

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
B. Iodines						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
C. Particulates Half-Life ≥ 8 days						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
D. Tritium						
N/A	Ci	-	-	-	-	-
E. Carbon-14						
N/A	Ci	-	-	-	-	-
F. Gross Alpha						
N/A	Ci	-	-	-	-	-

* Brunswick Steam Electric Plant Units 1 and 2 do not have batch elevated releases.

Attachment 1

Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Ground Releases - Continuous Mode

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
Kr-85m	Ci	1.37E-02	0.00E+00	0.00E+00	0.00E+00	1.37E-02
Kr-87	Ci	6.58E-03	0.00E+00	2.03E-02	0.00E+00	2.69E-02
Kr-88	Ci	7.48E-03	0.00E+00	0.00E+00	0.00E+00	7.48E-03
Xe-133	Ci	4.64E-01	0.00E+00	0.00E+00	0.00E+00	4.64E-01
Xe-135m	Ci	2.10E+01	4.50E+00	4.19E-02	1.95E+01	4.50E+01
Xe-135	Ci	1.20E+01	1.21E+01	1.00E+01	1.63E+01	5.04E+01
Xe-138	Ci	3.71E+00	6.02E+00	5.60E-02	1.26E-01	9.91E+00
Total for Period	Ci	3.72E+01	2.26E+01	1.01E+01	3.59E+01	1.06E+02
B. Iodines						
I-131	Ci	1.12E-02	1.18E-02	2.99E-03	1.17E-02	3.77E-02
I-133	Ci	1.04E-01	1.28E-01	3.05E-02	1.22E-01	3.85E-01
I-135	Ci	1.87E-01	2.34E-01	4.87E-02	2.01E-01	6.71E-01
Total for Period	Ci	3.03E-01	3.74E-01	8.21E-02	3.35E-01	1.09E+00
C. Particulates Half-Life ≥ 8 days						
Co-58	Ci	1.71E-05	0.00E+00	0.00E+00	0.00E+00	1.71E-05
Co-60	Ci	5.62E-06	8.09E-08	0.00E+00	1.02E-05	1.59E-05
Sr-89	Ci	5.01E-04	4.78E-04	4.32E-05	2.93E-04	1.32E-03
Sr-90	Ci	9.78E-09	1.02E-06	1.74E-08	0.00E+00	1.05E-06
Ru-106	Ci	1.52E-04	0.00E+00	0.00E+00	0.00E+00	1.52E-04
Ag-110m	Ci	2.33E-05	8.88E-06	0.00E+00	0.00E+00	3.22E-05
Ba-133	Ci	3.17E-04	0.00E+00	0.00E+00	0.00E+00	3.17E-04
Ba-140	Ci	1.22E-03	1.32E-03	2.39E-04	8.41E-04	3.62E-03
La-140	Ci	2.22E-03	2.32E-03	3.94E-04	1.48E-03	6.41E-03
Total for Period	Ci	4.46E-03	4.12E-03	6.76E-04	2.62E-03	1.19E-02
D. Tritium						
H-3	Ci	1.40E+01	1.55E+01	6.45E+00	7.55E+00	4.35E+01
E. Carbon-14						
C-14	Ci	9.46E-01	1.16E+00	1.19E+00	1.10E+00	4.40E+00
F. Gross Alpha						
Total for Period	Ci	1.01E-08	0.00E+00	0.00E+00	0.00E+00	1.01E-08

Attachment 1
Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Ground Releases - Batch Mode *

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
B. Iodines						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
C. Particulates Half-Life ≥ 8 days						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
D. Tritium						
N/A	Ci	-	-	-	-	-
E. Carbon-14						
N/A	Ci	-	-	-	-	-
F. Gross Alpha						
N/A	Ci	-	-	-	-	-

* Brunswick Steam Electric Plant Units 1 and 2 do not have batch ground releases.

Attachment 1 Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Mixed-Mode Releases - Continuous Mode

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
Xe-131m	Ci	0.00E+00	0.00E+00	0.00E+00	3.09E+00	3.09E+00
Xe-133	Ci	0.00E+00	0.00E+00	6.29E-01	0.00E+00	6.29E-01
Xe-135m	Ci	5.84E-01	3.24E-01	0.00E+00	1.16E+00	2.07E+00
Xe-135	Ci	6.95E+00	1.65E+00	7.73E-01	1.76E+00	1.11E+01
Total for Period	Ci	7.53E+00	1.98E+00	1.40E+00	6.01E+00	1.69E+01
B. Iodines						
I-131	Ci	8.47E-04	1.40E-04	1.34E-04	2.41E-04	1.36E-03
I-133	Ci	7.44E-03	9.56E-04	8.06E-04	1.91E-03	1.11E-02
I-135	Ci	1.07E-02	5.65E-04	0.00E+00	1.97E-03	1.32E-02
Total for Period	Ci	1.90E-02	1.66E-03	9.40E-04	4.13E-03	2.57E-02
C. Particulates Half-Life ≥ 8 days						
Cr-51	Ci	1.71E-05	0.00E+00	0.00E+00	0.00E+00	1.71E-05
Mn-54	Ci	9.74E-06	0.00E+00	0.00E+00	6.35E-07	1.04E-05
Co-58	Ci	1.91E-06	0.00E+00	0.00E+00	3.33E-06	5.24E-06
Co-60	Ci	1.07E-04	2.14E-05	2.93E-05	1.15E-05	1.69E-04
Sr-89	Ci	0.00E+00	4.32E-05	5.39E-07	0.00E+00	4.37E-05
Ba-140	Ci	2.37E-05	0.00E+00	0.00E+00	1.46E-05	3.83E-05
La-140	Ci	5.63E-05	0.00E+00	0.00E+00	2.61E-05	8.24E-05
Total for Period	Ci	2.16E-04	6.46E-05	2.99E-05	5.61E-05	3.67E-04
D. Tritium						
H-3	Ci	2.77E+00	1.92E+00	1.84E+00	9.87E-01	7.52E+00
E. Carbon-14						
C-14	Ci	1.89E+00	2.32E+00	2.37E+00	2.19E+00	8.77E+00
F. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 1 **Summary of Gaseous and Liquid Effluents**

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Mixed-Mode Releases - Batch Mode *

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
B. Iodines						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
C. Particulates Half-Life ≥ 8 days						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
D. Tritium						
N/A	Ci	-	-	-	-	-
E. Carbon-14						
N/A	Ci	-	-	-	-	-
F. Gross Alpha						
N/A	Ci	-	-	-	-	-

* Brunswick Steam Electric Plant Units 1 and 2 do not have batch mixed-mode releases.

Attachment 1

Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Summation of All Releases - Discharge Canal

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products *						
1. Total Release	Ci	2.51E-03	6.25E-03	1.29E-02	9.49E-03	3.12E-02
2. Avg. Diluted Conc.	µCi/ml	6.75E-12	1.27E-11	2.47E-11	2.06E-11	1.69E-11
B. Tritium						
1. Total Release	Ci	1.08E+01	1.09E+01	1.69E+01	2.93E+01	6.79E+01
2. Avg. Diluted Conc.	µCi/ml	2.91E-08	2.22E-08	3.24E-08	6.37E-08	3.68E-08
C. Dissolved & Entrained Gases						
1. Total Release	Ci	5.44E-02	4.44E-02	4.31E-02	1.28E-01	2.70E-01
2. Avg. Diluted Conc.	µCi/ml	1.47E-10	9.03E-11	8.26E-11	2.78E-10	1.46E-10
D. Gross Alpha						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
E. Volume of Liquid Waste						
1. Batch Releases	Liters	3.43E+06	4.77E+06	6.35E+06	1.24E+07	2.70E+07
2. Continuous Releases	Liters	1.14E+08	9.65E+07	2.41E+08	8.27E+07	5.34E+08
F. Volume of Dilution Water						
1. All Releases	Liters	3.72E+11	4.92E+11	5.22E+11	4.60E+11	1.85E+12

* Excludes tritium, dissolved and entrained noble gases, and gross alpha.

Attachment 1 **Summary of Gaseous and Liquid Effluents**

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Summation of All Releases - Marsh Area

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products *						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Avg. Diluted Conc.	µCi/ml	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
B. Tritium						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Avg. Diluted Conc.	µCi/ml	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
C. Dissolved & Entrained Gases						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Avg. Diluted Conc.	µCi/ml	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Gross Alpha						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Avg. Diluted Conc.	µCi/ml	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
E. Volume of Liquid Waste						
1. Batch Releases	Liters	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Continuous Releases	Liters	5.07E+07	5.07E+07	5.13E+07	5.13E+07	2.04E+08
F. Volume of Dilution Water						
1. All Releases	Liters	5.07E+07	5.07E+07	5.13E+07	5.13E+07	2.04E+08

* Excludes tritium, dissolved and entrained noble gases, and gross alpha.

Attachment 1
Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Continuous Mode - Discharge Canal

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products						
None	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
B. Tritium						
H-3	Ci	5.11E-01	3.11E-01	2.15E-01	0.00E+00	1.04E+00
C. Dissolved & Entrained Gases						
None	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 1
Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Continuous Mode - Marsh Area

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products						
None	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
B. Tritium						
H-3	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
C. Dissolved & Entrained Gases						
None	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 1 Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Batch Mode - Discharge Canal

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products						
Na-24	Ci	0.00E+00	7.36E-04	3.03E-05	0.00E+00	7.66E-04
Cr-51	Ci	0.00E+00	0.00E+00	0.00E+00	4.98E-04	4.98E-04
Mn-54	Ci	7.60E-06	4.96E-05	1.61E-06	5.61E-04	6.20E-04
Co-58	Ci	2.33E-06	9.10E-05	0.00E+00	2.03E-04	2.96E-04
Co-60	Ci	9.33E-05	9.64E-04	1.42E-04	2.75E-03	3.95E-03
Fe-59	Ci	0.00E+00	0.00E+00	0.00E+00	3.05E-05	3.05E-05
Zn-65	Ci	0.00E+00	6.19E-05	0.00E+00	4.97E-05	1.12E-04
Zn-69m	Ci	0.00E+00	1.61E-05	0.00E+00	0.00E+00	1.61E-05
Sr-91	Ci	2.54E-05	3.22E-05	0.00E+00	0.00E+00	5.76E-05
Sr-92	Ci	3.58E-06	0.00E+00	0.00E+00	0.00E+00	3.58E-06
Y-91m	Ci	4.52E-05	1.80E-05	0.00E+00	0.00E+00	6.32E-05
Y-92	Ci	5.51E-04	0.00E+00	0.00E+00	0.00E+00	5.51E-04
Y-93	Ci	7.20E-05	0.00E+00	0.00E+00	0.00E+00	7.20E-05
Tc-104	Ci	0.00E+00	4.20E-06	0.00E+00	5.67E-06	9.87E-06
Ag-111	Ci	0.00E+00	1.19E-05	0.00E+00	0.00E+00	1.19E-05
Sb-124	Ci	0.00E+00	0.00E+00	0.00E+00	3.45E-05	3.45E-05
Sb-125	Ci	1.61E-05	0.00E+00	4.99E-06	1.16E-03	1.18E-03
I-131	Ci	8.06E-04	1.38E-03	3.64E-03	1.56E-03	7.39E-03
I-132	Ci	0.00E+00	0.00E+00	1.61E-06	0.00E+00	1.61E-06
I-133	Ci	5.54E-04	2.26E-03	7.54E-03	2.19E-03	1.25E-02
I-135	Ci	2.94E-05	5.06E-04	1.54E-03	3.21E-04	2.40E-03
Cs-134	Ci	0.00E+00	1.03E-05	0.00E+00	1.45E-05	2.48E-05
Cs-137	Ci	1.03E-05	6.75E-05	6.87E-06	6.67E-05	1.51E-04
Cs-138	Ci	0.00E+00	0.00E+00	0.00E+00	1.17E-05	1.17E-05
Ba-139	Ci	0.00E+00	0.00E+00	0.00E+00	1.74E-05	1.74E-05
Ba-140	Ci	1.43E-04	4.09E-05	0.00E+00	0.00E+00	1.84E-04
Ba-141	Ci	0.00E+00	5.87E-06	8.36E-06	0.00E+00	1.42E-05
La-140	Ci	1.38E-04	0.00E+00	0.00E+00	3.16E-06	1.41E-04
La-142	Ci	8.80E-06	0.00E+00	0.00E+00	0.00E+00	8.80E-06
Ce-141	Ci	1.51E-07	0.00E+00	0.00E+00	0.00E+00	1.51E-07
Total for Period	Ci	2.51E-03	6.25E-03	1.29E-02	9.49E-03	3.12E-02
B. Tritium						
H-3	Ci	1.03E+01	1.06E+01	1.67E+01	2.93E+01	6.69E+01
C. Dissolved & Entrained Gases						
Kr-85m	Ci	5.45E-06	6.60E-06	0.00E+00	6.29E-05	7.50E-05
Kr-87	Ci	0.00E+00	0.00E+00	0.00E+00	2.96E-06	2.96E-06
Kr-88	Ci	0.00E+00	1.63E-05	0.00E+00	0.00E+00	1.63E-05
Kr-89	Ci	0.00E+00	0.00E+00	6.60E-05	0.00E+00	6.60E-05
Xe-133m	Ci	1.41E-04	7.80E-05	3.71E-05	1.47E-04	4.03E-04
Xe-133	Ci	1.05E-02	8.70E-03	9.79E-03	2.62E-02	5.52E-02
Xe-135m	Ci	3.28E-06	4.21E-05	3.80E-04	1.09E-05	4.36E-04
Xe-135	Ci	4.38E-02	3.56E-02	3.28E-02	1.01E-01	2.13E-01
Total for Period	Ci	5.44E-02	4.44E-02	4.31E-02	1.28E-01	2.70E-01

Attachment 1
Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

D. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 1
Summary of Gaseous and Liquid Effluents

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Batch Mode - Marsh Area

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products						
None	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
B. Tritium						
H-3	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
C. Dissolved & Entrained Gases						
None	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 2
Supplemental Information

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 2

Supplemental Information

This attachment includes supplemental information to the gaseous and liquid effluents report.

Attachment 2 Supplemental Information

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

I. Regulatory Limits - Per Unit

A. Noble Gases - Air Dose

1. Calendar Quarter Gamma Dose	= 5	mRAD
2. Calendar Quarter Beta Dose	= 10	mRAD
3. Calendar Year Gamma Dose	= 10	mRAD
4. Calendar Year Beta Dose	= 20	mRAD

B. Liquid Effluents - Dose

1. Calendar Quarter Total Body Dose	= 1.5	mREM
2. Calendar Quarter Organ Dose	= 5	mREM
3. Calendar Year Total Body Dose	= 3	mREM
4. Calendar Year Organ Dose	= 10	mREM

C. Gaseous Effluents - Iodine-131 & 133, Tritium, and Particulates with Half-lives > 8 days

1. Calendar Quarter Organ Dose	= 7.5	mREM
2. Calendar Year Organ Dose	= 15	mREM

II. Maximum Permissible Effluent Concentrations

A. Gaseous Effluents

- Information found in Offsite Dose Calculation Manual

B. Liquid Effluents

- Information found in 10 CFR Part 20, Appendix B, Table 2, Column 2

III. Average Energy

(not applicable)

IV. Measurements and Approximations of Total Radioactivity

Analyses of specific radionuclides in selected or composited samples as described in the ODCM are used to determine the radionuclide composition of the effluent. A summary description of the method used for estimating overall errors associated with radioactivity measurements is provided as part of this attachment.

V. Batch Releases

A. Liquid Effluents

		Jan - Jun	Jul - Dec
1. Total Number of Batch Releases	=	120	262
2. Total Time (min) for Batch Releases	=	2.34E+04	6.12E+04
3. Maximum Time (min) for a Batch Release	=	6.11E+02	5.40E+03
4. Average Time (min) for Batch Releases	=	1.95E+02	2.34E+02
5. Minimum Time (min) for a Batch Release	=	1.40E+01	1.30E+01
6. Average Dilution Water Flow During Release (gpm)	=	7.70E+05	8.44E+05

B. Gaseous Effluents

		Jan - Jun	Jul - Dec
1. Total Number of Batch Releases	=	N/A	N/A
2. Total Time (min) for Batch Releases	=	N/A	N/A
3. Maximum Time (min) for a Batch Release	=	N/A	N/A
4. Average Time (min) for Batch Releases	=	N/A	N/A
5. Minimum Time (min) for a Batch Release	=	N/A	N/A

VI. Abnormal Releases

See Attachment 5, Unplanned Offsite Releases.

Attachment 2 Supplemental Information

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Carbon-14

In Regulatory Guide 1.21, Revision 2, "Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste", the NRC recommends U.S. nuclear power plants evaluate whether C-14 is a "principal radionuclide" in gaseous effluents, and if so, report the amount of C-14 released. Improvements over the years in effluent management practices and fuel performance have resulted in a decrease in gaseous radionuclide (non-C-14) concentrations, and a change in the distribution of gaseous radionuclides released to the environment. As a result, many sites show C-14 has become a "principal radionuclide" for the gaseous effluent pathway, as defined in Regulatory Guide 1.21, Rev. 2. Although committed to Regulatory Guide 1.21, Rev. 1, the Brunswick Steam Electric Plant 2024 ARERR contains estimates of C-14 radioactivity released in 2024 and estimates of public dose resulting from the C-14 effluent.

Because the dose contribution of C-14 from liquid radioactive waste is much less than that contributed by gaseous radioactive waste, evaluation of C-14 in liquid radioactive waste is not required (Ref. Reg. Guide 1.21, Rev. 2). The quantity of gaseous C-14 released to the environment can be estimated by use of a C-14 source term scaling factor based on power generation (Ref. Reg. Guide 1.21, Rev. 2). The Brunswick Steam Electric Plant Updated Final Safety Analysis Report (UFSAR) states the C-14 release rate from a BWR is approximately 9.5 Ci/yr per unit assuming 80% plant capacity factor, or 292 Effective Full Power Days (EFPD). Since Brunswick Steam Electric Plant has two reactors, the total release rate would be 19.0 Ci/yr. Using actual EFPD for Unit 1 and Unit 2, the total C-14 release rate was 2.19E+01 Ci/yr.

Public dose estimates from airborne C-14 are performed using dose models in Regulatory Guide 1.109. The dose models and assumptions used are documented in the Brunswick Steam Electric Plant ODCM 3.3.3, Carbon-14. The estimated C-14 dose impact on the maximum organ dose from airborne effluents released from Brunswick Steam Electric Plant in 2024 is well below the 10CFR50, Appendix I, ALARA design objective (i.e., 15 mrem/yr per unit).

Based on the 2024 Land Use Census, the critical receptor is located in the south sector at 2.2 miles with a garden. There are no meat or milk pathways within 5 miles. Regulatory Guide 1.109 methodology was used to determine the dose to this critical receptor. The bone dose for 2024 was 1.74E+00 mrem and the total body dose was 3.48E-01 mrem.

	<u>Units</u>	<u>Year</u>
1. C-14 Activity Released	Ci	2.19E+01
2. C-14 Total Body Dose	mREM	3.48E-01
3. C-14 Organ Dose	mREM	1.74E+00

Receptor Location **2.2 miles S**

Critical Age **CHILD**

Critical Organ **BONE**

Attachment 2 Supplemental Information

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Discussion of liquid releases from the Storm Drain Collector Basin (SDCB)

During periods of heavy rain, the contents of the SDCB may be released to the discharge canal in accordance with regulatory requirements to protect plant personnel and equipment. The SDCB was released directly to the discharge canal on 25 occasions in 2024 due to heavy rains. Approximately $5.40\text{E}+06$ gallons containing $1.43\text{E}-02$ curies of tritium were released. There was no detectable gamma radioactivity.

Discussion of liquid releases from the Storm Drain Stabilization Facility (SDSF)

The SDSF collects rainwater, water from miscellaneous low volume drains on plant site, water from the Groundwater Extraction System, and water from the Unit 1 CST Remediation Facility. Treatment consists of filtration and evaporation. When sufficient water has accumulated in the pond it is released into the intake canal where it is drawn into the plant circulating and service water system and eventually released into the discharge canal. The SDSF was turned into a continuous release in July of 2023. Approximately $1.22\text{E}+08$ gallons containing $1.04\text{E}+00$ curies of tritium were released from the SDSF. There was no detectable gamma radioactivity.

Discussion of water evaporation from the Drainage Holding Facility (DHF)

It was calculated that up to $1.53\text{E}+06$ cubic feet of water vapor were released via evaporation from the DHF in 2024. This yields $0.00\text{E}+00$ curies of tritium released to the atmosphere as a ground release. The nearest resident to the pond is in the north sector at approximately 0.3 miles. Only inhalation dose would be determined because the exposed individuals do not have a garden and do not have any milk or meat animals at this location. The Drainage Holding Facility (DHF) was completed and placed in service in March 2023.

Discussion of water evaporation from the Storm Drain Stabilization Facility (SDSF)

It was calculated that $1.43\text{E}+06$ cubic feet of water vapor were released via evaporation from the SDSF in 2024. This yields $1.36\text{E}-01$ curies of tritium released to the atmosphere as a ground release. The nearest resident to the pond is in the north-northwest sector at approximately 0.5 miles. The maximum exposed individuals at that location received a calculated dose of $8.75\text{E}-05$ mrem via the inhalation pathway in 2024. Only inhalation dose was determined because the exposed individuals do not have a garden and do not have any milk or meat animals at this location.

Attachment 2 Supplemental Information

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Discussion of liquid releases from the Marsh to Nancy's Creek

Samples are routinely analyzed from the marsh areas that drain into Nancy's Creek during falling tides. The marsh areas are all on company owned property. The marsh land is under the influence of high and low tides and releases to Nancy's Creek, which is offsite. This constitutes a release point for evaluation. The sampling program consists of monthly sampling and analysis at nine locations. All gamma analyses performed in 2024 were less than the Lower Limit of Detection (LLD). Some tritium analyses were greater than the LLD. The average tritium concentration each month, two high tides per day, the area of the marsh at high tide, the days in the month, and a conservative factor of 2 were used to calculate the amount of tritium released each month. In 2024, it was calculated that $5.39\text{E}+07$ gallons were released to Nancy's Creek containing $0.00\text{E}+00$ curies of tritium. This yielded a Total Body dose of $0.00\text{E}+00$ mrem to an adult from eating fish and invertebrate.

Discussion of liquid releases from the-Drainage Holding Facility (DHF)

The new Drainage Holding Facility (DHF) was completed in March of 2023. The DHF controls aquatic vegetation by use of an aeration system and weighted high-density polyethylene (HDPE) balls. Also, the DHF is double lined to reduce the potential for any tritium leakage to groundwater. When sufficient water has accumulated in the DHF pond it is released into the intake canal where it is drawn into the plant circulating and service water system and eventually released into the discharge canal. The DHF can also serve as a back-up to the Storm Drain Stabilization Facility (SDSF) and can take inputs from the SDSF as well as all listed SDSF inputs. Typically, the DHF is maintained non-radioactive, and primarily takes rainwater runoff from the Retired Storm Drain Stabilization Pond (RSDSP). When in release the DHF is considered a continuous release per BNP ODCM. Approximately $1.40\text{E}+07$ gallons were released in 2024 containing $0.00\text{E}+00$ curies of tritium. There was no detectable gamma radioactivity.

Attachment 2 Supplemental Information

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Overall Estimate of Error for Effluent Radioactivity Release Reported

The estimated percentage of overall error for Gaseous effluent release data at Brunswick Steam Electric Plant is listed below. These values were derived by taking the square root of the sum of the squares of the discrete individual estimates of error.

1. Fission and Activation Gases	= ± 25%
2. Particulates and Iodine	= ± 25%
3. Tritium	= ± 15%

The estimated percentage of overall error for Liquid effluent release data at Brunswick Steam Electric Plant is listed below. These values were derived by taking the square root of the sum of the squares of the discrete individual estimates of error.

1. Fission and Activation Products and Dissolved and Entrained Noble Gases	= ± 17%
2. Tritium	= ± 23%
3. Gross Alpha	= ± 32%

Overall Estimate of Error for Solid Waste Radioactivity Reported

The estimated percentage of overall error for Solid Waste data at Brunswick Steam Electric Plant has been determined to be ± 10%.

Attachment 2 Supplemental Information

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Summary of Changes in Land Use Census Affecting Effluent Dose Calculations

The 2024 Land Use Census was performed July 8-9, 2024. The results were certified and made available for use on August 21, 2024. The following are changes to residences, gardens, and milk animals from the previous year.

Residences

- No resident changes identified in the 2024 LUC

Gardens

- The garden in the NNE sector (0.99 miles) was not present and a replacement was not found within 5.0 miles.
- The garden in the ESE sector (1.48 miles) was not present and a replacement was not found within 5.0 miles.
- The garden in the S sector (1.56 miles) was not present and was replaced with a new garden at 2.17 miles.
- The garden in the SSW sector (1.59 miles) was not present and was replaced with a new garden at 1.72 miles.
- The garden in the SW sector (0.97 miles) was replaced with a new garden at 2.88 miles.
- The garden in the WSW sector (1.27 miles) was not present and a replacement was not found within 5.0 miles.
- The garden in the W sector (1.28 miles) was replaced with a new garden at 4.07 miles.
- The garden in the NW sector (0.95 miles) was replaced with a new garden at 4.30 miles.
- The garden in the NNW sector (0.96 miles) was replaced with a new garden at 1.02 miles.

Milk Animals

No milk animals (cows or goats) were identified in the 5-mile radius in any of the 16 meteorological sectors.

Attachment 3
Solid Radioactive Waste Disposal

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 3

Solid Radioactive Waste Disposal

This attachment includes a summary of the solid waste shipped off-site for burial and/or disposal, including:

- Container volume
- Total Curie content
- Principal Radionuclides
- Source/Type of waste
- Solidification agent or absorbent
- Type of shipping container
- Number of shipments
- Other relevant information as necessary

Attachment 3 Solid Radioactive Waste Disposal

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Type of Waste Shipped	Number of Shipments	Number of Containers	Waste Class	Container Type	Solidification Agent	Burial Volume (m ³)	Total Activity (Curies)
1. <u>Waste from Liquid Systems</u>							
a. Spent Resins, Filters, Sludges (dewatered)	22	35	A	Type A GDP	N/A	1.17E+2	1.35E+2
b. Spent Resins, Filters, Sludges (dewatered)	19	19	B	Type A Type B	N/A	5.34E+1	9.19E+2
c. Solidified (cement) Acids, Oily Water	0	-	-	-	-	-	-
2. <u>Dry Solid Waste</u>							
a. Dry Active Waste (compacted & non-compacted)	53	91	A	Type A GDP	N/A	2.47E+3	2.97
b. Dry Active Waste (compacted & non-compacted)	1	1	B	Type B	N/A	1.08E-2	3.41E-1
c. Irradiated Components	1	1	B	Type B	N/A	8.81E-3	2.88
d. Other Waste (oil/sludge)	11	11	A	Type A GDP	N/A	1.96E+2	5.40E-1
3. <u>Total Solid Waste</u>	107	158	-	-	-	2.84E+3	1.06E+3

NOTE: Total Activity determined by estimate. Solid Waste listed above shipped for processing to various waste processing services or directly shipped to licensed disposal facility via ground transportation.

Attachment 3 Solid Radioactive Waste Disposal

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Type of Waste Shipped	Radionuclide	% Abundance
1. <u>Waste from Liquid Systems</u>		
a. Spent Resins, Filters, Sludges (dewatered)	Fe-55	34.98
	Mn-54	2.95
	Co-60	39.43
	Ni-63	12.69
	Zn-65	5.39
	Cs-137	2.16
b. Solidified (cement) Acids, Oily Water	N/A	N/A
2. <u>Dry Solid Waste</u>		
a. Dry Active Waste (compacted & non- compacted)	Fe-55	50.7
	Mn-54	5.9
	Co-60	37.15
	Ni-63	1.74
	Cr-51	1.26
	Zn-65	1.09
b. Irradiated Components	Fe-55	44.81
	Co-60	49.53
	Ni-63	4.85
c. Other Waste	H-3	52.44
	Fe-55	3.79
	Co-60	13.02
	Ni-63	18.33
	Cs-137	10.91

Attachment 4
Meteorological Data

Brunswick Nuclear Plant
Period 1/1/2024 - 12/31/2024

ATTACHMENT 4

Meteorological Data

This attachment includes a summary of meteorological joint frequency distributions of wind speed, wind direction, and atmospheric stability (hours of occurrence) for each respective height (lower-level and upper level).

Attachment 4 Meteorological Data

Brunswick Nuclear Plant
Period 1/1/2024 - 12/31/2024

Lower Level

Stability Class	Wind Speed (mph)	Hours of Occurrence															
		Sector															
		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW
A	0.75-3.50	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
	3.51-7.50	0	0	0	0	0	1	1	0	0	0	0	0	0	0	1	1
	7.51-12.50	0	0	0	7	3	0	0	0	0	17	19	0	0	0	0	0
	12.51-18.50	0	0	0	7	2	0	0	0	1	10	3	0	0	0	0	0
	18.51-25.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B	0.75-3.50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
	3.51-7.50	5	5	2	1	1	6	8	2	0	1	4	0	0	2	9	8
	7.51-12.50	10	11	6	17	18	9	2	1	23	91	84	4	1	3	2	14
	12.51-18.50	0	0	2	2	2	0	0	0	7	18	10	0	0	0	0	0
	18.51-25.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C	0.75-3.50	2	0	0	0	0	1	0	0	0	0	0	0	2	1	2	1
	3.51-7.50	21	22	13	3	7	16	28	11	10	15	30	12	5	11	21	20
	7.51-12.50	16	13	71	75	51	9	7	13	53	89	101	7	7	10	6	9
	12.51-18.50	0	2	14	8	0	0	0	2	4	6	9	2	0	0	0	0
	18.51-25.00	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
D	0.75-3.50	16	10	6	12	9	10	9	6	3	7	22	16	21	16	16	26
	3.51-7.50	141	208	107	110	67	63	81	70	86	172	296	98	62	37	60	93
	7.51-12.50	54	119	270	178	65	26	33	39	123	196	289	41	17	19	12	27
	12.51-18.50	0	2	14	11	8	6	2	17	21	22	54	3	0	0	0	1
	18.51-25.00	0	0	0	0	1	0	0	4	9	0	2	0	0	0	0	0
	25+	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0

Attachment 4 Meteorological Data

Brunswick Nuclear Plant
Period 1/1/2024 - 12/31/2024

Lower Level

Stability Class	Wind Speed (mph)	Hours of Occurrence															
		Sector															
		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW
E	0.75-3.50	91	37	36	29	28	22	23	21	21	30	98	72	81	65	71	58
	3.51-7.50	157	109	46	53	37	30	51	55	43	66	284	81	44	44	45	47
	7.51-12.50	1	11	10	9	5	11	14	22	9	40	87	9	0	1	1	1
	12.51-18.50	0	2	0	0	1	0	0	2	4	8	7	1	0	0	0	0
	18.51-25.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
F	0.75-3.50	108	30	19	12	5	6	12	9	11	15	35	62	58	58	86	91
	3.51-7.50	12	2	1	6	3	10	9	2	2	8	19	7	1	11	9	5
	7.51-12.50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	12.51-18.50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	18.51-25.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	0.75-3.50	41	6	4	1	0	1	0	1	3	2	5	30	51	57	79	66
	3.51-7.50	1	0	0	0	0	1	0	0	0	0	0	0	0	2	0	0
	7.51-12.50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	12.51-18.50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	18.51-25.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Attachment 4 Meteorological Data

Brunswick Nuclear Plant
Period 1/1/2024 - 12/31/2024

Upper Level

Stability Class	Wind Speed (mph)	Hours of Occurrence															
		Sector															
		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW
A	0.75-3.50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3.51-7.50	0	1	0	0	0	1	0	1	0	0	0	0	0	0	0	0
	7.51-12.50	0	0	0	1	1	0	0	0	0	1	0	1	0	0	0	1
	12.51-18.50	0	0	0	8	5	0	0	0	0	15	17	0	0	0	1	0
	18.51-25.00	0	0	0	3	1	0	0	0	0	9	7	0	0	0	0	0
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B	0.75-3.50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	3.51-7.50	2	0	0	0	1	1	4	0	0	0	0	0	0	0	0	0
	7.51-12.50	6	3	2	6	6	11	9	1	6	10	20	4	0	2	7	2
	12.51-18.50	11	6	6	14	13	0	0	1	14	64	79	7	0	0	3	20
	18.51-25.00	1	1	2	2	0	0	0	0	3	14	14	1	1	3	1	2
	25+	0	0	0	0	0	0	0	0	0	1	5	0	0	0	0	0
C	0.75-3.50	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1
	3.51-7.50	3	3	2	0	4	6	15	6	2	0	2	4	1	5	4	7
	7.51-12.50	16	18	18	27	32	18	17	17	28	43	49	29	4	2	15	15
	12.51-18.50	14	5	38	51	31	5	1	4	24	47	57	20	4	5	10	14
	18.51-25.00	3	1	8	19	9	0	0	2	1	7	12	4	6	5	3	3
	25+	0	0	0	1	0	0	0	0	1	0	6	4	0	0	0	0
D	0.75-3.50	0	2	1	3	2	5	4	5	1	1	2	5	1	6	2	3
	3.51-7.50	11	13	15	18	21	16	32	24	10	30	25	26	33	12	18	13
	7.51-12.50	36	41	50	76	78	37	41	37	96	96	144	66	37	25	29	47
	12.51-18.50	94	108	201	242	75	13	21	27	84	193	234	78	36	16	21	55
	18.51-25.00	28	31	60	92	56	11	20	26	22	66	131	35	23	14	14	36
	25+	1	3	3	1	11	10	15	24	23	14	41	26	6	4	0	2

Attachment 4 Meteorological Data

Brunswick Nuclear Plant
Period 1/1/2024 - 12/31/2024

Upper Level

Stability Class	Wind Speed (mph)	Hours of Occurrence															
		Sector															
		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW
E	0.75-3.50	1	0	3	0	2	2	0	5	1	0	0	0	1	2	2	0
	3.51-7.50	0	3	14	10	4	8	11	6	10	8	8	13	7	5	6	9
	7.51-12.50	16	19	36	37	32	27	28	21	25	48	57	47	31	23	25	17
	12.51-18.50	63	99	127	84	54	20	24	44	26	65	140	133	74	55	29	65
	18.51-25.00	7	6	18	9	8	8	21	41	6	32	119	106	28	23	19	13
	25+	0	1	2	0	0	0	6	6	5	19	13	5	0	0	0	0
F	0.75-3.50	1	0	2	1	3	1	2	3	2	2	1	1	1	0	2	0
	3.51-7.50	2	1	3	5	8	5	6	12	14	10	12	9	11	7	10	7
	7.51-12.50	10	8	13	23	16	14	12	22	26	29	17	22	21	22	15	16
	12.51-18.50	28	25	43	30	11	6	6	9	7	8	27	26	26	11	29	17
	18.51-25.00	11	5	14	2	1	0	14	2	1	5	12	24	13	10	19	17
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
G	0.75-3.50	2	2	1	3	1	2	2	2	2	1	1	0	1	0	0	3
	3.51-7.50	5	3	3	5	3	11	2	7	6	11	6	2	1	9	14	3
	7.51-12.50	7	11	13	15	15	8	0	11	10	18	14	11	13	20	15	11
	12.51-18.50	25	23	17	19	8	1	2	0	5	4	5	11	20	10	5	12
	18.51-25.00	6	5	4	4	0	0	2	0	0	2	1	6	22	11	6	4
	25+	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0

Attachment 5
Unplanned Offsite Releases

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 5

Unplanned Offsite Releases

This attachment includes a summary of the unplanned offsite releases of gaseous and liquid radioactive effluents.

Attachment 5
Unplanned Offsite Releases

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick Steam Electric Plant did not experience any unplanned offsite gaseous or liquid effluent releases in 2024.

Attachment 6
Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 6

Assessment of Radiation Dose from Radioactive Effluents to Members of the Public
(includes fuel cycle dose calculation results)

This attachment includes an assessment of radiation doses to the maximum exposed member of the public due to radioactive liquid and gaseous effluents released from the site for each calendar quarter for the calendar year of the report as well as the total dose for the calendar year.

This attachment also includes an assessment of radiation doses to the maximum exposed member of the public from all uranium fuel cycle sources within 8 km of the site for the calendar year of this report to show conformance with 40 CFR Part 190.

Methods for calculating the dose contribution from liquid and gaseous effluents are given in the Offsite Dose Calculation Manual (ODCM).

Attachment 6

Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents Dose Summary

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Noble Gases						
1. Maximum Beta Air	mRAD	1.38E-02	1.28E-02	5.69E-03	1.18E-02	4.42E-02
(a) Limit	mRAD	2.00E+01	2.00E+01	2.00E+01	2.00E+01	4.00E+01
(b) % of Limit		6.92E-02	6.39E-02	2.84E-02	5.92E-02	1.10E-01
2. Maximum Gamma Air	mRAD	3.20E-02	2.26E-02	9.02E-03	2.50E-02	8.86E-02
(a) Limit	mRAD	1.00E+01	1.00E+01	1.00E+01	1.00E+01	2.00E+01
(b) % of Limit		3.20E-01	2.26E-01	9.02E-02	2.50E-01	4.43E-01

Receptor Location **0.7 miles ENE**

B. Iodine, H-3, & Particulates						
1. Maximum Organ Dose	mREM	2.76E-01	3.14E-01	1.51E-01	2.74E-01	1.01E+00
(a) Limit	mREM	1.50E+01	1.50E+01	1.50E+01	1.50E+01	3.00E+01
(b) % of Limit		1.84E+00	2.09E+00	1.01E+00	1.82E+00	3.38E+00

Receptor Location **4.75 miles NE**

Critical Age **Infant**

Critical Organ **Thyroid**

C. SDSF Evaporation H-3						
1. Maximum Organ Dose	mREM	1.73E-05	3.11E-05	1.42E-05	2.49E-05	8.75E-05
(c) Limit	mREM	1.50E+01	1.50E+01	1.50E+01	1.50E+01	3.00E+01
(d) % of Limit		1.15E-04	2.07E-04	9.50E-05	1.66E-04	2.92E-04

Receptor Location **0.5 miles NNW**

Critical Age **Teen**

Critical Organ **None**

D. C-14						
1. Maximum Organ Dose	mREM	3.77E-01	4.63E-01	4.67E-01	4.32E-01	1.74E+00
(e) Limit	mREM	1.50E+01	1.50E+01	1.50E+01	1.50E+01	3.00E+01
(f) % of Limit		2.51E+00	3.08E+00	3.12E+00	2.88E+00	5.80E+00

Receptor Location **2.2 miles S**

Critical Age **Child**

Critical Organ **Bone**

Attachment 6 **Assessment of Radiation Dose from Radioactive Effluents to Members of the Public**

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents Dose Summary

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Batch & Continuous Mode						
1. Maximum Organ Dose	mREM	6.48E-04	1.00E-03	2.71E-03	1.12E-03	5.48E-03
(a) Limit	mREM	1.00E+01	1.00E+01	1.00E+01	1.00E+01	2.00E+01
(b) % of Limit		6.48E-03	1.00E-02	2.71E-02	1.12E-02	2.74E-02
2. Maximum Total Body Dose	mREM	6.47E-05	1.38E-04	4.90E-05	1.90E-04	4.42E-04
(a) Limit	mREM	3.00E+00	3.00E+00	3.00E+00	3.00E+00	6.00E+00
(b) % of Limit		2.16E-03	4.60E-03	1.63E-03	6.34E-03	7.36E-03

Critical Age **ADULT**

Critical Organ **Thyroid**

Attachment 6

Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

40 CFR Part 190 Uranium Fuel Cycle Dose Calculation Results

In accordance with the requirements of 40 CFR Part 190, the annual dose commitment to any member of the general public shall be calculated to assure that doses are limited to 25 millirems to the total body or any organ with the exception of the thyroid which is limited to 75 millirems. The fuel cycle dose assessment for Brunswick Steam Electric Plant includes liquid and gaseous effluent dose contributions from Brunswick Steam Electric Plant and direct and air-scatter dose from the onsite ISFSI and Turbine Buildings. No other uranium fuel cycle facility contributes significantly to the maximum exposed individual. Also included is dose from Carbon-14, evaporation of tritium from both the DHF, and SDSF, and marsh releases containing tritium to Nancy's Creek (Ref. Attachment 2, Supplemental Information, of this report for further information). The combined dose to a maximum exposed individual from effluent releases and direct and air-scatter dose is below 40 CFR Part 190 limits as shown by the following summary.

Note: The 40 CFR Part 190 effluent dose analysis to the maximum exposed individual from liquid and gas releases does not include the dose from noble gases (i.e., total body and skin) due to the low significance compared to other dose pathways.

40 CFR Part 190 Effluent Dose Summary			
A. Gaseous Effluent Dose		D. DHF Evap. H-3 Dose	
1. Location	4.75 mi. NE	1. Location	0.30 mi. N
2. Critical Age	INFANT	2. Critical Age	TEEN
3. Critical Organ	THYROID	3. Critical Organ	N/A
4. Organ Dose (mREM)	1.01E+00	4. Organ Dose (mREM)	0.00E+00
5. Total Body Dose (mREM)	3.05E-03	5. Total Body Dose (mREM)	0.00E+00
B. Liquid Effluent Dose		E. SDSF Evaporation H-3 Dose	
1. Location	0.10 mi. SW	1. Location	0.50 mi. NNW
2. Critical Age	ADULT	2. Critical Age	TEEN
3. Critical Organ	THYROID	3. Critical Organ	N/A
4. Organ Dose (mREM)	5.48E-03	4. Organ Dose (mREM)	8.75E-05
5. Total Body Dose (mREM)	4.42E-04	5. Total Body Dose (mREM)	8.75E-05
C. Carbon-14 Dose		F. Nancy's Creek Marsh H-3 Dose	
1. Location	2.2 mi. S	1. Location	Nancy's Creek
2. Critical Age	CHILD	2. Critical Age	ADULT
3. Critical Organ	BONE	3. Critical Organ	N/A
4. Organ Dose (mREM)	1.74+00	4. Organ Dose (mREM)	0.00E+00
5. Total Body Dose (mREM)	3.48E-01	5. Total Body Dose (mREM)	0.00E+00

Attachment 6

Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Brunswick Steam Electric Plant Units 1 & 2 Period 1/1/2024 - 12/31/2024

Direct and air-scatter radiation dose contributions from the onsite ISFSI and Turbine Buildings are shown in plant operating manual 10CFR72.212 Evaluation Report for NUHOMS Casks, 10 CFR 72.212 Evaluation Report, revision 1. The maximum dose rate to the nearest real individual from the ISFSI and Turbine Buildings is conservatively calculated to be less than 14.8 mrem/yr. The below excerpt from 10CFR72.212 Evaluation Report for NUHOMS Casks, 10 CFR 72.212 Evaluation Report, revision 1, Attachment 1, is provided to document the method used to calculate the dose from the onsite ISFSI and Turbine Buildings as less than 14.8 mrem/yr to the nearest real individual.

5.2.2 Dose from Normal Operations and Anticipated Occurrences

5. *The real dose contribution from direct radiation sources during plant operations at BSEP it taken at 14.8 mrem/year.*

Dose contributions from Carbon-14 in gaseous effluents have been determined from ODCM 3.3.3, Carbon-14. The maximum dose rate to the nearest real individual from the release of Carbon-14 in gaseous effluents is conservatively calculated to be less than 1.74E+00 mrem/yr based on 2.19E+01 Curies released in 2024 (Ref. Attachment 2, Supplemental Information, of this report).

Dose contributions from evaporation of the Drainage Holding Facility (DHF) have been determined from ODCM 3.3.2, I-131, I-133, Particulates, and Tritium, equation 3.3-19. The maximum dose rate to the nearest real individual from evaporation of tritium in the DHF is calculated to be 0.00E+00 mrem/yr based on 0.00E+00 Curies released in 2024 (Ref. Attachment 2, Supplemental Information, of this report).

Dose contributions from evaporation of the Storm Drain Stabilization Facility (SDSF) have been determined from ODCM 3.3.2, I-131, I-133, Particulates, and Tritium, equation 3.3-19. The maximum dose rate to the nearest real individual from evaporation of tritium in the SDSF is conservatively calculated to be less than 8.75E-05 mrem/yr based on 1.36E-01 Curies released in 2024 (Ref. Attachment 2, Supplemental Information, of this report).

Dose contributions from marsh releases to Nancy's Creek from ODCM 2.1.7, Marsh Releases. The maximum dose rate to the nearest real individual from marsh releases to Nancy's Creek is conservatively calculated to be less than 0.00E+00 mrem/yr based on 0.00E+00 Curies released in 2024 (Ref. Attachment 2, Supplemental Information, of this report).

Total dose from liquid and gaseous effluents from Brunswick Steam Electric Plant and the additional pathways mentioned above is conservatively estimated to be less than 17.9 mrem/yr for total body and organ. It is recognized summing dose for different organs and age groups is not entirely accurate. However, the sum of the organ and age specific doses will always be less than the sum of the maximums of each. Therefore, summing the maximum values of each provides the most conservative value to ensure compliance with 40 CFR 190. The dose from all pathways related to operation of Brunswick Steam Electric Plant meets the 40 CFR Part 190 requirements of an annual dose commitment to any member of the general public of less than 25 mrem total body or any organ and 75 mrem to the thyroid.

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 7

Information to Support the NEI Ground Water Protection Initiative

This attachment includes a summary of voluntary reports made in accordance with the NEI Ground Water Protection Initiative and a summary of ground water well sample data.

Attachment 7 Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2 Period 1/1/2024 - 12/31/2024

The Brunswick Steam Electric Plant groundwater sampling and analysis program is a significant surveillance program. Wells are installed around the Retired Storm Drain Stabilization Pond (RSDSP), in the Protected Area (PA), and throughout the Owner Controlled Area (OCA). The wells listed in the ODCM are collected as part of the Radiological Environmental Monitoring Program (REMP) and reported in the Annual Radiological Environmental Operating Report (AREOR). The monitoring wells not described in the ODCM are listed below. The list consists of shallow wells, intermediate wells, and deep aquifer wells in different locations around the OCA and PA. They are used to evaluate groundwater movement and for remediation of the Unit 1 Condensate Storage Tank (CST) leak and the RSDSP.

Unit 1 CST Groundwater Wells - The investigation into groundwater impacts resulting from the December 2010 Unit 1 Condensate Storage Tank line leak resulted in the installation of numerous monitoring/recovery wells. Two of these wells (U1CSTREM-07BCH and U1CSTREM-09BCH) are installed in the Castle Hayne aquifer (greater than 70' below ground surface) to investigate and monitor potential impacts to the aquifer. Nine of these wells (U1CSTREM-05B, U1CSTREM-02B, GWM-17, U1CSTREM-09B, GWM-15, U1CSTREM-21B, U1CSTREM-22B, U1CSTREM-27B, MW-01B) are installed in the dense sand unit (45' - 70' below ground surface) to investigate and monitor impacts to this flow zone comprised of native material beneath the plant excavation backfill. Twenty-three of these wells (GWM-01, U1CSTREM-09C, U1CSTREM-10C, U1CSTREM-11C, U1CSTREM-12C, GWM-13, GWM-15, GWM-16, GWM-18, GWM-19, U1CSTREM-21C, U1CSTREM-22B, GWM-11, GWM-22, GWM-21, U1CSTREM-27C, U1CSTREM-28C, GWM-02, GWM-08, GWM-09, U1CSTREM-32C, GWM-10, GWM-12) are installed in the plant excavation backfill (up to 45' below ground surface) to investigate and monitor impacts to this flow zone where the leak occurred. Seven (7) of these wells are currently used as recovery wells as part of the groundwater remediation effort.

Monitoring wells are typically sampled on a frequency determined from activity of the wells, risk assessments, and historical trends. This frequency can range from weekly to every two years. Ground water samples are regularly analyzed for tritium. There were no notifications per NEI 07-07, Industry Ground Water Protection Initiative in 2024.

No voluntary reports made in accordance with NEI Ground Water Protection Initiative in 2024. Results from sampling during 2024 are shown in the table below.

Key to below table

-	-	Not scheduled to be sampled, not sampled due to insufficient volume in well, or well inaccessible during outage.
pCi/l	-	picocuries per liter.
< LLD	-	less than lower limit of detection, typically 250 pCi/l.
20,000 pCi/l	-	the Environmental Protection Agency drinking water standard for tritium. This standard applies only to water used for drinking.
1,000,000 pCi/l	-	the 10 CFR Part 20, Appendix B, Table 2, Column 2, Effluent Concentration Limit for tritium.

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick Shallow Wells for Plant Site						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
ESS-2C	2	1	246	<LLD	246	27
ESS-3C	2	1	252	<LLD	252	14
ESS-12C	-	-	-	-	-	15
ESS-13C	2	0	<LLD	<LLD	<LLD	25
ESS-16	1	1	699	699	699	27
ESS-17C	2	2	4980	4700	5260	26
ESS-18C	2	2	3660	909	6410	20
ESS-19C	2	2	70300	70200	70400	20
ESS-20C	4	4	860	711	958	20
ESS-21C	1	0	<LLD	<LLD	<LLD	20
ESS-22C	1	0	<LLD	<LLD	<LLD	20
ESS-23C	2	2	36700	35000	38400	23
ESS-24C	4	4	2993	2260	3580	18
ESS-25C	1	0	<LLD	<LLD	<LLD	22
ESS-26C	2	2	609	188	1030	15
ESS-27C	2	2	49650	48600	50700	16
ESS-28C	1	0	<LLD	<LLD	<LLD	23
ESS-29C	1	0	<LLD	<LLD	<LLD	28
ESS-30C	1	0	<LLD	<LLD	<LLD	15
ESS-31C	1	0	<LLD	<LLD	<LLD	15
ESS-38C	-	-	-	-	-	15
ESS-39C	-	-	-	-	-	20
ESS-40C	-	-	-	-	-	30
ESS-41C	-	-	-	-	-	27
ESS-42C	-	-	-	-	-	30
ESS-44C	-	-	-	-	-	15
ESS-45C	-	-	-	-	-	21
ESS-46C	-	-	-	-	-	18
ESS-48C	-	-	-	-	-	18
ESS-49C	-	-	-	-	-	19
ESS-50C	-	-	-	-	-	22
ESS-51C	1	0	<LLD	<LLD	<LLD	22
ESS-54C	1	0	<LLD	<LLD	<LLD	24
ESS-55C	1	0	<LLD	<LLD	<LLD	38
ESS-56C	1	0	<LLD	<LLD	<LLD	32
ESS-58C	1	0	<LLD	<LLD	<LLD	18
ESS-59C	1	0	<LLD	<LLD	<LLD	18
ESS-60C	-	-	-	-	-	19

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick Shallow Wells for Plant Site						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
ESS-67C	1	0	<LLD	<LLD	<LLD	25
ESS-68C	-	-	-	-	-	19
ESS-69C	-	-	-	-	-	30
ESS-70C	-	-	-	-	-	18
ESS-71C	-	-	-	-	-	19
ESS-72C	1	0	<LLD	<LLD	<LLD	18
ESS-73C	-	-	-	-	-	15
ESS-74C	-	-	-	-	-	25
ESS-201C	2	2	750	693	806	19
ESS-202C	4	4	6010	2950	8440	19
ESS-203C	2	2	457	306	607	19
ESS-STAB	12	12	40573	642	62000	31
ESS-NC-4A	12	12	19658	17700	21000	17
MW-3	1	1	309	309	309	26
MWPA-100C	1	1	271	271	271	30
MWPA-101C	2	1	235	<LLD	235	29
MWPA-102C	1	1	368	368	368	30
MWPA-103C	1	1	260	260	260	30
MWPA-104C	1	1	406	406	406	29
MWPA-105C	1	1	300	300	300	30
MWPA-106C	1	1	237	237	237	29
MWPA-107C	4	4	1988	1740	2330	29
MWPA-108C	2	0	<LLD	<LLD	<LLD	29
MWPA-109C	4	4	976	715	1290	29
MWPA-110C	2	1	295	<LLD	295	29
MWPA-113C	4	4	1535	1390	1710	25
MWPA-114C	4	4	831	722	1040	30
MWPA-115C	2	2	1635	1630	1640	34
MWPA-117C	2	2	327	242	411	30
MWPA-118C	1	1	384	384	384	30
GWSP- 1C	1	0	<LLD	<LLD	<LLD	19
ESS-61C	-	-	-	-	-	28
ESS-62C	-	-	-	-	-	20
ESS-63C	-	-	-	-	-	29
ESS-64C	-	-	-	-	-	21
ESS-65C	-	-	-	-	-	15
ESS-66C	-	-	-	-	-	20
ESS-57C	1	0	<LLD	<LLD	<LLD	40

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick Shallow Wells for Plant Site						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
ESS-43C	-	-	-	-	-	17
ESS-32C	-	-	-	-	-	35
ESS-33C	-	-	-	-	-	25
ESS-35C	-	-	-	-	-	20
ESS-36C	-	-	-	-	-	22
SME-01C	1	0	<LLD	<LLD	<LLD	36
WG-02-OW-1	2	2	10800	10200	11400	35

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick Intermediate Wells for Plant Site						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
ESS-1B	2	0	<LLD	<LLD	<LLD	63
ESS-3B	-	-	-	-	-	52
ESS-13B	2	2	357	346	367	57
ESS-19B	4	4	5963	4770	7180	42
ESS-20B	1	0	<LLD	<LLD	<LLD	43
ESS-21B	2	0	<LLD	<LLD	<LLD	67
ESS-25B	2	0	<LLD	<LLD	<LLD	43
ESS-38B	-	-	-	-	-	55
ESS-39B	-	-	-	-	-	55
ESS-51B	1	0	<LLD	<LLD	<LLD	45
ESS-52B	1	0	<LLD	<LLD	<LLD	51
ESS-53B	1	0	<LLD	<LLD	<LLD	76
MWPA-104B	1	1	1490	1490	1490	59
MWPA-107B	2	2	1935	1900	1970	60
MWPA-118B	2	0	<LLD	<LLD	<LLD	60
ESS-401-BCH	1	0	<LLD	<LLD	<LLD	85
U1CSTREM-01BCH	1	0	<LLD	<LLD	<LLD	85
GWSP-2B	1	1	511	511	511	65
GWSP-4B	1	1	404	404	404	65
SME-01BCH	1	0	<LLD	<LLD	<LLD	100
SME-02B	1	0	<LLD	<LLD	<LLD	66
SME-02BCH	1	0	<LLD	<LLD	<LLD	107
SME-03B	1	0	<LLD	<LLD	<LLD	58
SME-04B	1	0	<LLD	<LLD	<LLD	50

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick Deep Wells for Plant Site						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
ESS-13A	1	0	<LLD	<LLD	<LLD	134
ESS-27A	2	0	<LLD	<LLD	<LLD	150
SME-01A	1	0	<LLD	<LLD	<LLD	175
SME-02A	1	0	<LLD	<LLD	<LLD	157
SME-04A	1	0	<LLD	<LLD	<LLD	155
SME-05A	1	0	<LLD	<LLD	<LLD	166

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick <u>Unit 1 CST</u> Groundwater Wells						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
GWM-01	51	48	995	<LLD	1629	61
GWM-02	-	-	-	-	-	45
GMW-06	-	-	-	-	-	45
GWM-08	-	-	-	-	-	45
GWM-09	-	-	-	-	-	46
GWM-10	-	-	-	-	-	45
GWM-11	-	-	-	-	-	45
GWM-12	-	-	-	-	-	33
GMW-13	52	52	5765	3318	10480	44
GWM-14	52	52	3176	873	3839	44
GMW-15	52	44	509	<LLD	851	59
GWM-16	52	51	18742	<LLD	27908	40
GMW-17	52	51	5309	<LLD	7912	68
GWM-18	52	51	11630	<LLD	19020	29
GMW-19	52	52	5648	1640	8957	40
GMW-20	3	3	3878	1416	8256	45
GMW-21	-	-	-	-	-	45
GWM-22	-	-	-	-	-	29
MW-1	4	3	329	<LLD	381	24
MW-1B	4	2	306	<LLD	316	45
U1CSTREM-02B	12	5	701	<LLD	1118	68
U1CSTREM-07BCH	7	1	535	<LLD	535	85
U1CSTREM-09B	12	11	678	<LLD	1582	68
U1CSTREM-09BCH	12	2	390	<LLD	457	85
U1CSTREM-09C	12	12	3009	1789	4696	45
U1CSTREM-10C	4	1	305	<LLD	305	45
U1CSTREM-11C	4	1	329	<LLD	329	40
U1CSTREM-12C	6	5	1368	<LLD	2439	34
U1CSTREM-21B	12	7	380	<LLD	575	69
U1CSTREM-21C	12	12	3662	2365	4917	45
U1CSTREM-22B	4	2	320	<LLD	361	69
U1CSTREM-27B	4	1	279	<LLD	279	68
U1CSTREM-27C	12	10	496	<LLD	615	45
U1CSTREM-28C	12	9	509	<LLD	625	45
U1CSTREM-32C	4	0	<LLD	<LLD	<LLD	45

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick SDSP EW Groundwater Wells						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
EW-01	2	2	40000	30400	49600	24
EW-02	2	2	25085	7970	42200	28.1
EW-03	2	2	25100	22600	27600	25.3
EW-04	2	2	84050	75200	92900	27.6
EW-05	2	2	115000	112000	118000	26.3
EW-06	2	2	24200	23700	24700	25.8
EW-07	2	2	72700	65500	79900	25.2
EW-08	2	2	48600	38400	58800	25.1
EW-09	2	2	25350	12700	38000	27.7
EW-10	2	2	4185	1430	6940	27.8
EW-11	2	2	33000	24200	41800	24.8
EW-12	2	2	42950	42400	43500	22.4
EW-13	2	2	39150	35600	42700	26
EW-14	2	2	28700	26900	30500	27.1
EW-15	2	2	39550	38900	40200	26.2
EW-16	2	2	35400	22100	48700	28.5
EW-17	2	2	20770	8240	33300	25.4
EW-18	2	2	7080	6530	7630	20.6
EW-19	2	2	7160	5960	8360	24.9
EW-20	-	-	-	-	-	19
EW-21	-	-	-	-	-	22.4
EW-22	-	-	-	-	-	24.2
EW-23	-	-	-	-	-	22.6
EW-24	-	-	-	-	-	21.9
EW-25	-	-	-	-	-	24.5
EW-26	2	2	1745	1730	1760	25.1
EW-27	-	-	-	-	-	22.9
EW-28	-	-	-	-	-	23.7
EW-29	2	2	2245	1900	2590	24.7
EW-30	2	2	1909	608	3210	21.7
EW-31	2	2	12350	11900	12800	25.7
EW-32	2	2	21450	19700	23200	18.5
EW-33	2	2	15600	14700	16500	19.9
EW-34	2	2	22850	18600	27100	18.7
EW-35	2	2	13800	10300	17300	18.1
EW-36	2	2	24200	23800	24600	23.2
EW-37	2	2	31450	30800	32100	23

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick SDSP EW Groundwater Wells						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
EW-38	2	2	15255	4410	26100	19.7
EW-39	2	2	64250	63900	64600	21
EW-40	2	2	51000	47200	54800	24.8
EW-41	2	2	62050	56300	67800	23.6
EW-42	2	2	49400	47200	51600	20.2
EW-43	2	2	41950	38000	45900	18.8
EW-44	2	2	68950	64900	73000	19.8
EW-45	2	2	49750	26300	73200	19.8
EW-46	2	2	54900	54400	55400	26.7
EW-47	2	2	33050	32500	33600	30
EW-48	2	2	31350	29500	33200	23.1
EW-49	2	2	43250	42700	43800	21.1
EW-50	2	2	16450	16100	16800	26.2
EW-51	2	2	57500	51900	63100	25
EW-52	2	2	84650	82400	86900	18
EW-53	2	2	65000	62800	67200	17.1
EW-54	2	2	37400	31100	43700	18.3
EW-55	2	2	58900	53500	64300	19.5
EW-56	2	2	38750	37600	39900	18.5
EW-57	2	2	28650	25000	32300	19
EW-58	2	2	38350	38000	38700	19.6
EW-59	2	2	40600	40200	41000	21.6
EW-60	2	2	8030	7530	8530	19.8
EW-61	2	2	10000	10000	10000	16.2
EW-62	2	2	7105	3610	10600	17.4
EW-63	2	2	5540	4480	6600	16.8
EW-64	2	2	16400	14900	17900	15.8
EW-65	2	2	16200	16100	16300	16.3
EW-66	2	1	15000	<LLD	15000	19.3
EW-67	2	2	6980	6910	7050	20
EW-68	2	2	9915	9730	10100	22.7
EW-69	2	2	14550	13900	15200	24.1
EW-70	2	2	8045	7590	8500	22.5
EW-71	2	2	6780	6510	7050	17.5
EW-72	2	2	2845	2510	3180	18.3
EW-73	2	2	9670	9640	9700	19.8
EW-74	2	2	25250	25200	25300	20.6
EW-75	2	2	11210	7520	14900	21.6

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick SDSP EW Groundwater Wells						
Well Name	Number of Samples in 2024	Number of Positive H-3 Samples in 2024	Average H-3 Activity (pCi/L)	Minimum H-3 Activity (pCi/L)	Maximum H-3 Activity (pCi/L)	Depth of Well (ft)
EW-76	2	2	15100	13300	16900	19.7
EW-77	2	2	19150	18300	20000	19.9
EW-78	2	2	29750	28400	31100	21.3
EW-79	2	2	38700	36300	41100	16.7
EW-80	2	2	43950	40100	47800	15
EW-81	2	2	20400	18700	22100	21
EW-82	2	2	24150	22600	25700	21.9
EW-83	2	2	10600	10600	10600	19.2
EW-84	2	2	17100	16900	17300	20.4
EW-85	-	-	-	-	-	20.6
EW-86	2	2	2765	1660	3870	23.8
EW-87	2	2	868	824	911	21.1
EW-88	-	-	-	-	-	21.5
EW-89	2	2	5265	4300	6230	20.6
EW-90	2	2	2225	2000	2450	19.2
EW-91	-	-	-	-	-	20.3
EW-92	-	-	-	-	-	19

Attachment 8
Inoperable Equipment

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 8

Inoperable Equipment

This attachment includes an explanation of inoperable instruments related to effluent monitoring in excess of allowed time defined by licensing bases and an explanation of liquid hold-up tanks exceeding 10 Curies total activity (excluding tritium and dissolved or entrained noble gases).

Attachment 8 Inoperable Equipment

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Brunswick Steam Electric Plant experienced two (2) instances of inoperable equipment relevant to effluent monitoring in excess of ODCM Specification 7.3.0 limits during 2024.

ODCM # From Table 7.3.2-1	Title	Completion Time
5	Main Condenser Off-Gas Treatment System Explosive Gas Monitoring System – Hydrogen Monitor	30 Days

Description:

The 1-OG-AIT-4284 (SJAE Room 1A/1B H2/O2 Analyzer H3B) was out of service greater than 30-days due to component failure. Investigation found that the detector needed a new flow meter. Delays in procurement of flowmeter is the cause of the 30-day exceedance. Once the part was received it was replaced.

ODCM # From Table 7.3.3-1	Title	Completion Time
1	Sample Tanks, Detergent Drain Tank, and Salt Water Release Tanks (Batch Release)	31 Days

Description:

There was inadvertent disposition of a release sample taken from a Unit 2 Salt Water Release Tank (L-2024-0145) prior to compiling the 31 day composite. Due to the inadvertent disposition, the sample could not be added to the composite for Sr-89, Sr-90, Fe-55, Ni-63, tritium, and liquid alpha analysis. The sample gamma analysis was in line with other Salt Water Release Tank samples for the month. NCR 02522796.

Brunswick Steam Electric Plant experienced no Liquid Hold-Up Tank exceeding the 10 Curie limit of ODCMS 7.3.6 during 2024.

Attachment 9
Summary of Changes to the Offsite Dose Calculation Manual

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 9

Summary of Changes to the Offsite Dose Calculation Manual

This attachment includes a summary of changes to the ODCM and Radiological Effluent Controls.

Attachment 9
Summary of Changes to the Offsite Dose Calculation Manual

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ODCM Revision 40

The Brunswick Steam Electric Plant ODCM was not revised in 2024. The most recent revision is 40.

Attachment 10
Summary of Changes to the Process Control Program

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 10

Summary of Changes to the Process Control Program

This attachment includes a summary of changes to the PCP.

Attachment 10
Summary of Changes to the Process Control Program

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

No changes were made to the BSEP Process Control Program (PCP) in 2024.

Attachment 11
Summary of Major Modifications to the Radioactive Waste Treatment Systems

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 11

Summary of Major Modifications to the Radioactive Waste Treatment Systems

This attachment includes a description of major modifications to the radioactive waste treatment systems that are anticipated to affect effluent releases.

Attachment 11
Summary of Major Modifications to the Radioactive Waste Treatment Systems

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

Summary:

No major modifications to Brunswick Steam Electric Plant liquid, gaseous, solid, or mobile radioactive waste treatment systems occurred in 2024.

Attachment 12
Errata to a Previous Year's ARERR

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 12

Errata to a Previous Year's ARERR

This attachment includes any amended pages from a previous year's ARERR.

Attachment 12
Errata to a Previous Year's ARERR

Brunswick Steam Electric Plant Units 1 & 2
Period 1/1/2024 - 12/31/2024

There are no changes to a previous year's ARERR.

Enclosure 2
RA-25-0095

ENCLOSURE 2: CNS Annual Radioactive Effluent Release Report



Catawba Nuclear Station Units 1 and 2

Annual Radioactive Effluent Release Report

January 1, 2024 through December 31, 2024

Dockets 50-413 and 50-414



Introduction

The Annual Radioactive Effluent Release Report is pursuant to Catawba Nuclear Station Technical Specification 5.6.3 and Selected Licensee Commitment 16.11-16. The below listed attachments to this report provide the required information.

Attachment 1	Summary of Gaseous and Liquid Effluents
Attachment 2	Supplemental Information
Attachment 3	Solid Radioactive Waste Disposal
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Attachment 1
Summary of Gaseous and Liquid Effluents

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 1

Summary of Gaseous and Liquid Effluents

This attachment includes a summary of the quantities of radioactive liquid and gaseous effluents as outlined in Regulatory Guide 1.21, Appendix B.

Attachment 1 Summary of Gaseous and Liquid Effluents

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Summation of All Releases

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
1. Total Release	Ci	7.97E-01	6.49E-01	7.59E-01	5.60E-01	2.76E+00
2. Avg. Release Rate	μCi/sec	1.01E-01	8.25E-02	9.55E-02	7.05E-02	8.74E-02
B. Iodine-131						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Avg. Release Rate	μCi/sec	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
C. Particulates Half-Life ≥ 8 days						
1. Total Release	Ci	1.23E-05	1.03E-05	0.00E+00	0.00E+00	2.25E-05
2. Avg. Release Rate	μCi/sec	1.58E-06	1.31E-06	0.00E+00	0.00E+00	7.15E-07
D. Tritium						
1. Total Release	Ci	4.51E+01	3.11E+01	3.59E+01	3.23E+01	1.44E+02
2. Avg. Release Rate	μCi/sec	5.73E+00	3.96E+00	4.51E+00	4.07E+00	4.57E+00
E. Carbon-14						
1. Total Release	Ci	5.02E+00	5.01E+00	5.26E+00	4.53E+00	1.98E+01
2. Avg. Release Rate	μCi/sec	6.38E-01	6.37E-01	6.61E-01	5.70E-01	6.27E-01
F. Gross Alpha						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Avg. Release Rate	μCi/sec	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 1 **Summary of Gaseous and Liquid Effluents**

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Elevated Releases - Continuous Mode *

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
B. Iodines						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
C. Particulates Half-Life ≥ 8 days						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
D. Tritium						
N/A	Ci	-	-	-	-	-
E. Carbon-14						
N/A	Ci	-	-	-	-	-
F. Gross Alpha						
N/A	Ci	-	-	-	-	-

* Catawba Nuclear Station Units 1 and 2 do not have elevated releases.

Attachment 1

Summary of Gaseous and Liquid Effluents

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Elevated Releases - Batch Mode *

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
B. Iodines						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
C. Particulates Half-Life $\geq$ 8 days						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
D. Tritium						
N/A	Ci	-	-	-	-	-
E. Carbon-14						
N/A	Ci	-	-	-	-	-
F. Gross Alpha						
N/A	Ci	-	-	-	-	-

* Catawba Nuclear Station Units 1 and 2 do not have elevated releases.

Attachment 1 Summary of Gaseous and Liquid Effluents

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Ground Releases - Continuous Mode

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
None	Ci	-	-	-	-	-
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
B. Iodines						
None	Ci	-	-	-	-	-
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
C. Particulates Half-Life ≥ 8 days						
None	Ci	-	-	-	-	-
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Tritium						
H-3	Ci	4.45E+01	3.04E+01	3.53E+01	3.19E+01	1.42E+02
E. Carbon-14 *						
C-14	Ci	1.51E+00	1.50E+00	1.58E+00	1.36E+00	5.94E+00
F. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

* 30% of total C-14 released is assumed to be in continuous mode. See Attachment 2, Supplemental Information, of this report.

Attachment 1 Summary of Gaseous and Liquid Effluents

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Ground Releases - Batch Mode

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
Ar-41	Ci	6.86E-01	6.26E-01	6.82E-01	4.90E-01	2.48E+00
Kr-85	Ci	1.04E-01	2.18E-02	7.37E-02	6.78E-02	2.67E-01
Xe-133	Ci	0.00E+00	0.00E+00	0.00E+00	2.61E-05	2.61E-05
Xe-135	Ci	6.80E-03	1.15E-03	3.00E-03	1.97E-03	1.29E-02
Total for Period	Ci	7.97E-01	6.49E-01	7.59E-01	5.60E-01	2.76E+00
B. Iodines						
None	Ci	-	-	-	-	-
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
C. Particulates Half-Life ≥ 8 days						
None	Ci	-	-	-	-	-
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Tritium						
H-3	Ci	5.87E-01	7.51E-01	5.91E-01	4.11E-01	2.34E+00
E. Carbon-14 *						
C-14	Ci	3.51E+00	3.51E+00	3.68E+00	3.17E+00	1.39E+01
F. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

* 70% of total C-14 released is assumed to be in batch mode. See Attachment 2, Supplemental Information, of this report.

Attachment 1 **Summary of Gaseous and Liquid Effluents**

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Mixed-Mode Releases - Continuous Mode *

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
B. Iodines						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
C. Particulates Half-Life $\geq$ 8 days						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
D. Tritium						
N/A	Ci	-	-	-	-	-
E. Carbon-14						
N/A	Ci	-	-	-	-	-
F. Gross Alpha						
N/A	Ci	-	-	-	-	-

* Catawba Nuclear Station Units 1 and 2 do not have mixed-mode releases.

Attachment 1 **Summary of Gaseous and Liquid Effluents**

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents - Mixed-Mode Releases - Batch Mode *

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Gases						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
B. Iodines						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
C. Particulates Half-Life ≥ 8 days						
N/A	Ci	-	-	-	-	-
Total for Period	Ci	-	-	-	-	-
D. Tritium						
N/A	Ci	-	-	-	-	-
E. Carbon-14						
N/A	Ci	-	-	-	-	-
F. Gross Alpha						
N/A	Ci	-	-	-	-	-

* Catawba Nuclear Station Units 1 and 2 do not have mixed-mode releases.

Attachment 1

Summary of Gaseous and Liquid Effluents

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Summation of All Releases

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products *						
1. Total Release	Ci	8.85E-02	2.41E-02	1.18E-02	2.47E-02	1.49E-01
2. Avg. Diluted Conc.	µCi/ml	3.17E-09	5.55E-10	3.44E-10	9.32E-10	1.13E-09
3. Batch Releases	µCi/ml	3.17E-09	5.55E-10	3.44E-10	9.32E-10	1.13E-09
B. Tritium						
1. Total Release	Ci	6.62E+02	2.42E+02	4.69E+02	2.72E+02	1.65E+03
2. Avg. Diluted Conc.	µCi/ml	2.37E-05	5.58E-06	1.36E-05	1.03E-05	1.24E-05
3. Batch Releases	µCi/ml	2.37E-05	5.58E-06	1.36E-05	1.03E-05	1.24E-05
C. Dissolved & Entrained Gases						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Avg. Diluted Conc.	µCi/ml	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3. Batch Releases	µCi/ml	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Gross Alpha						
1. Total Release	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Avg. Diluted Conc.	µCi/ml	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
3. Batch Releases	µCi/ml	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
E. Volume of Liquid Waste						
1. Continuous Releases	liters	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
2. Batch Releases	liters	1.61E+06	9.44E+05	1.51E+06	1.37E+06	5.43E+06
F. Volume of Dilution Water						
1. Continuous Releases	liters	2.79E+09	4.34E+09	3.45E+09	2.65E+09	1.32E+10
2. Batch Releases	liters	2.79E+10	4.34E+10	3.45E+10	2.65E+10	1.32E+11

* Excludes tritium, dissolved and entrained noble gases, and gross alpha.

Attachment 1
Summary of Gaseous and Liquid Effluents

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Continuous Mode

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products						
None	Ci	-	-	-	-	-
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
B. Tritium						
H-3	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
C. Dissolved & Entrained Gases						
None	Ci	-	-	-	-	-
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 1 Summary of Gaseous and Liquid Effluents

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents - Batch Mode

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Fission and Activation Products						
Ag-110m	Ci	1.20E-05	3.93E-05	4.07E-05	6.59E-06	9.86E-05
Be-7	Ci	9.43E-05	1.10E-04	7.68E-05	4.82E-04	7.63E-04
Bi-214	Ci	0.00E+00	6.12E-07	1.07E-05	8.78E-06	2.01E-05
Co-57	Ci	2.18E-04	7.13E-06	0.00E+00	0.00E+00	2.25E-04
Co-58	Ci	1.23E-02	5.74E-03	1.46E-03	3.02E-03	2.26E-02
Co-60	Ci	3.00E-02	3.39E-03	4.68E-03	5.44E-03	4.35E-02
Cr-51	Ci	7.39E-04	3.63E-03	0.00E+00	6.71E-03	1.11E-02
Cs-134	Ci	0.00E+00	0.00E+00	1.88E-06	0.00E+00	1.88E-06
Cs-137	Ci	4.78E-05	1.56E-05	5.29E-06	2.29E-05	9.15E-05
F-18	Ci	0.00E+00	0.00E+00	4.92E-06	0.00E+00	4.92E-06
Fe-55	Ci	1.41E-02	5.28E-03	2.10E-03	5.19E-03	2.66E-02
Fe-59	Ci	8.81E-05	1.46E-04	9.20E-06	8.95E-05	3.33E-04
Hf-181	Ci	4.21E-06	0.00E+00	0.00E+00	3.61E-06	7.82E-06
I-132	Ci	0.00E+00	6.33E-06	0.00E+00	0.00E+00	6.33E-06
I-134	Ci	0.00E+00	5.05E-05	0.00E+00	0.00E+00	5.05E-05
Mn-54	Ci	3.37E-03	2.73E-04	2.09E-04	3.64E-04	4.22E-03
Nb-95	Ci	9.73E-05	2.34E-04	1.58E-04	7.68E-04	1.26E-03
Nb-97	Ci	0.00E+00	0.00E+00	1.40E-05	8.68E-06	2.26E-05
Ni-63	Ci	2.65E-02	4.73E-03	2.85E-03	1.52E-03	3.56E-02
Pb-214	Ci	2.08E-05	2.19E-06	4.97E-05	9.70E-05	1.70E-04
Sb-124	Ci	0.00E+00	3.16E-05	0.00E+00	1.40E-04	1.72E-04
Sb-125	Ci	6.11E-04	2.71E-04	1.44E-04	4.46E-04	1.47E-03
Sb-126	Ci	0.00E+00	1.77E-06	0.00E+00	0.00E+00	1.77E-06
Zn-65	Ci	2.36E-04	0.00E+00	0.00E+00	5.46E-05	2.91E-04
Zr-95	Ci	0.00E+00	1.01E-04	2.04E-05	3.85E-04	5.06E-04
Total for Period	Ci	8.85E-02	2.41E-02	1.18E-02	2.47E-02	1.49E-01
B. Tritium						
H-3	Ci	6.62E+02	2.42E+02	4.69E+02	2.72E+02	1.65E+03
C. Dissolved & Entrained Gases						
None	Ci	-	-	-	-	-
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
D. Gross Alpha						
Total for Period	Ci	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Attachment 2
Supplemental Information

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 2

Supplemental Information

This attachment includes supplemental information to the gaseous and liquid effluents report.

Attachment 2 Supplemental Information

Catawba Nuclear Station Units 1 & 2 Period 1/1/2024 - 12/31/2024

I. Regulatory Limits - Per Unit

A. Noble Gases - Air Dose

1. Calendar Quarter Gamma Dose	= 5	mRAD
2. Calendar Quarter Beta Dose	= 10	mRAD
3. Calendar Year Gamma Dose	= 10	mRAD
4. Calendar Year Beta Dose	= 20	mRAD

B. Liquid Effluents – Dose

1. Calendar Quarter Total Body Dose	= 1.5	mREM
2. Calendar Quarter Organ Dose	= 5	mREM
3. Calendar Year Total Body Dose	= 3	mREM
4. Calendar Year Organ Dose	= 10	mREM

C. Gaseous Effluents - Iodine-131 & 133, Tritium, and Particulates with Half-lives ≥ 8 days

1. Calendar Quarter Organ Dose	= 7.5	mREM
2. Calendar Year Organ Dose	= 15	mREM

II. Maximum Permissible Effluent Concentrations

A. Gaseous Effluents

1. Information found in Offsite Dose Calculation Manual

B. Liquid Effluents

1. Information found in 10 CFR Part 20, Appendix B, Table 2, Column 2

III. Average Energy

(not applicable)

IV. Measurements and Approximations of Total Radioactivity

Analyses of specific radionuclides in selected or composited samples as described in the Selected Licensee Commitments are used to determine the radionuclide composition of the effluent. A summary description of the method used for estimating overall errors associated with radioactivity measurements is provided as part of this attachment.

V. Batch Releases

A. Liquid Effluents

1. Total Number of Batch Releases	=	111
2. Total Time (min) for Batch Releases	=	8.32E+03
3. Maximum Time (min) for a Batch Release	=	1.48E+03
4. Average Time (min) for Batch Releases	=	7.49E+01
5. Minimum Time (min) for a Batch Release	=	3.40E+01
6. Average Dilution Water Flow During Release (gpm)	=	6.63E+04

B. Gaseous Effluents

1. Total Number of Batch Releases	=	70
2. Total Time (min) for Batch Releases	=	1.01E+06
3. Maximum Time (min) for a Batch Release	=	4.43E+04
4. Average Time (min) for Batch Releases	=	1.45E+04
5. Minimum Time (min) for a Batch Release	=	8.80E+01

VI. Abnormal Releases

See Attachment 5, Unplanned Offsite Releases.

Attachment 2 Supplemental Information

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Carbon-14

Carbon-14 (C-14), with a half-life of 5730 years, is a naturally occurring isotope of carbon produced by cosmic ray interactions in the atmosphere. Nuclear weapons testing in the 1950s and 1960s significantly increased the amount of C-14 in the atmosphere. C-14 is also produced in commercial nuclear reactors, but the amounts produced are much less than those produced naturally or from weapons testing.

In Regulatory Guide 1.21, Revision 2, "Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste", the NRC recommends U.S. nuclear power plants evaluate whether C-14 is a "principal radionuclide", and if so, report the amount of C-14 released. Improvements over the years in effluent management practices and fuel performance have resulted in a decrease in gaseous radionuclide (non-C-14) concentrations, and a change in the distribution of gaseous radionuclides released to the environment. As a result, many sites show C-14 has become a "principal radionuclide" for the gaseous effluent pathway, as defined in Regulatory Guide 1.21, Rev. 2. Catawba Nuclear Station 2024 ARERR contains estimates of C-14 radioactivity released in 2024 and estimates of public dose resulting from the C-14 effluent.

Because the dose contribution of C-14 from liquid radioactive waste is much less than that contributed by gaseous radioactive waste, evaluation of C-14 in liquid radioactive waste is not required (Ref. Reg. Guide 1.21, Rev. 2). The quantity of gaseous C-14 released to the environment can be estimated by use of a C-14 source term scaling factor based on power generation (Ref. Reg. Guide 1.21, Rev. 2). Many documents provide information related to the magnitude of C-14 in typical effluents from commercial nuclear power plants. Those documents suggest that nominal annual releases of C-14 in gaseous effluents are approximately 5 to 7.3 curies from PWRs (Ref. Reg. Guide 1.21, Rev. 2). A more recent study recommends a higher C-14 gaseous source term scaling factor of approximately 9.0 to 9.8 Ci/GWe-yr for a PWR (Westinghouse) (Ref. EPRI 1021106). For the Catawba Nuclear Station 2024 ARERR, a source term scaling factor of 9.4 Ci/GWe-yr is assumed. Using a source term scaling factor of 9.4 Ci/GWe-yr and actual electric generation (MWe-hrs) from Catawba Nuclear Station in 2024 results in a site total C-14 gaseous release estimate to the environment of 1.98E+01 Curies. 70% of the C-14 gaseous effluent is assumed to be from batch releases and 30% of C-14 gaseous effluent is assumed to be from continuous releases through the unit vents (ref. IAEA Technical Reports Series no. 421, "Management of Waste Containing Tritium and Carbon-14", 2004).

C-14 releases in PWRs occur primarily as a mix of organic carbon and carbon dioxide released from the waste gas system. Since the PWR operates with a reducing chemistry, most, if not all, of the C-14 species initially produced are organic (e.g., methane). As a general rule, C-14 in the primary coolant is essentially all organic with a large fraction as a gaseous species. Any time the RCS liquid or gas is exposed to an oxidizing environment (e.g. during shutdown or refueling), a slow transformation from an organic to an inorganic chemical form can occur. Various studies documenting measured C-14 releases from PWRs suggest a range of 70% to 95% organic with an average of 80% organic with the remainder being CO₂ (Ref. EPRI TR-105715). For the Catawba Nuclear Station 2024 ARERR a value of 80% organic C-14 is assumed.

Public dose estimates from airborne C-14 are performed using dose models in NUREG-0133 and Regulatory Guide 1.109. The dose models and assumptions used are documented in the Catawba ODCM. The estimated C-14 dose impact on the maximum organ dose from airborne effluents released from Catawba Nuclear Station in 2024 is well below the 10CFR50, Appendix I, ALARA design objective (i.e., 15 mrem/yr per unit).

Attachment 2 Supplemental Information

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Overall Estimate of Error for Effluent Radioactivity Release Reported

The estimated percentage of overall error for both Liquid and Gaseous effluent release data at Catawba Nuclear Station has been determined to be $\pm 30.3\%$. This value was derived by taking the square root of the sum of the squares of the following discrete individual estimates of error:

1. Flow Rate Determining Devices	=	$\pm 20\%$
2. Counting Statistical Error	=	$\pm 20\%$
3. Calibration Error	=	$\pm 10\%$
4. Calibration Source Error	=	$\pm 2.5\%$
5. Sample Preparation Error	=	$\pm 3\%$

Attachment 2 Supplemental Information

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Summary of Changes in Land Use Census Affecting Effluent Dose Calculations

The 2024 Land Use Census was performed June 3 to 5, 2024, and the results were certified and made available for use on July 11th, 2024. The following are changes to residences, gardens, and milk animals from the previous year.

Residences

There were no changes to residences found during the 2024 Land Use Census.

Gardens

- The garden in the WSW sector (2.21 miles) was replaced with a garden at 2.07 miles.
- The garden in the NW sector (1.72 miles) was replaced with a garden at 1.62 miles.
- The garden in the NNW sector (1.04 miles) was not present and was replaced with a new garden at 2.15 miles.

Milk Animals

The owners of the milk animals previously identified in the SE sector at 4.89 miles who did not wish to participate in the REMP at the time of the Land Use Census no longer have milk animals.

Environmental Monitoring Locations

No changes to environmental monitoring locations in each sector as a result of the census.

Attachment 2 Supplemental Information

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

NCR 02549632: CNS Monitor Tank Building Gaseous Effluent Composite Sampling Deviation

Description

During the counting of the CNS Monitor Tank Building (MTB) air filter papers for the January 2025 effluent composite sample, it was identified by an ENRAD technician that only four air filters had been received, while five had been recorded in the chain of custody for the filter shipment. Subsequently It was found that the filter paper for the sample interval between 12/26/24 through 1/1/2025 had been counted as part of the December 2024 composites, meaning the missing filter paper had been included in those shipped for December 2024 and counted as part of the December 2024 gross alpha analysis, as well as the quarterly HTD (hard to detect) isotope count for Q4 2024.

Per RP procedure, AMTB samples are recorded on the composite spreadsheet for the month that sample collection is stopped, meaning this filter should have been shipped as part of January's composite sample due to its stopping date of 1/1/2025. This deviation will also impact the MTB composite sampling for January 2025 and Q1 2025.

Impact to Effluent Summary

The composite samples were analyzed by ENRAD and returned as being less than the Minimum Detectable Amount (<MDA) for monthly gross alpha and all analyzed HTD radionuclides for the quarter. As a result, no manual data entry was required for any of the MTB gaseous waste release (GWR) reports for Q4 2024. While the aforementioned filter paper should have been counted as part of the Q1 2025 composite sample, there were no releases during this period indicative of elevated gaseous activity within the MTB, and therefore no departure from the current trend of results below MDA is anticipated.

Attachment 3
Solid Radioactive Waste Disposal

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 3

Solid Radioactive Waste Disposal

This attachment includes a summary of the solid waste shipped off-site for burial and/or disposal, including:

- Container volume
- Total Curie content (specify whether determined by measurement or estimate)
- Principal Radionuclides
- Source and Type of waste
- Solidification agent or absorbent
- Type of shipping container
- Number of shipments
- Other relevant information as necessary

Attachment 3 Solid Radioactive Waste Disposal

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Type of Waste Shipped	Number of Shipments	Number of Containers	Waste Class	Container Type	Solidification Agent	Burial Volume (m ³)	Total Activity (Curies)
1. <u>Waste from Liquid Systems</u>							
a. Dewatered Secondary Resins	3	19	A	B-25	N/A	73.91	240
b. Dewatered Primary Resins	5	5	A / B / C	HIC	N/A	24.31	568
c. Evaporator Concentrates	0	-	-	-	-	-	-
d. Dewatered Mechanical Filters	0	-	-	-	-	-	-
e. Dewatered Demineralizers	0	-	-	-	-	-	-
f. Solidified (cement) Acids, Oils, Sludge	0	-	-	-	-	-	-
g. <i>Other (add as necessary)</i>	0	-	-	-	-	-	-
2. <u>Dry Solid Waste</u>							
a. Dry Active Waste (compacted)	0	-	-	-	-	-	-
b. Dry Active Waste (non-compacted)	1	1	A	GDP	N/A	5.69	1.15
c. Dry Active Waste (brokered)	13	38	A	GDP	N/A	606.1	52.7
d. Irradiated Components	0	-	-	-	-	-	-
e. <i>Other (add as necessary)</i>	0	-	-	-	-	-	-
3. <u>Total Solid Waste</u>	23	63				710	862

Attachment 3 Solid Radioactive Waste Disposal

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Type of Waste Shipped	Radionuclide	% Abundance
1. <u>Waste from Liquid Systems</u>		
a. Dewatered Secondary Resins	H-3	77.37%
	Mn-54	0.00%
	Co-60	0.00%
	Cs-137	0.00%
	Ce-144	0.00%
	C-14	9.69%
	Tc-99	11.26%
	I-129	1.66%
b. Dewatered Primary Resins	H-3	0.28%
	Be-7	0.07%
	Mn-54	1.94%
	Co-57	0.11%
	Co-58	2.58%
	Co-60	9.95%
	Zn-65	0.42%
	Nb-95	0.00%
	Zr-95	0.00%
	Sn-113	0.00%
	Sb-124	0.01%
	Sb-125	0.23%
	Cs-134	0.00%
	Cs-137	0.14%
	Ce-144	0.05%
	Pu-238	0.00%
	Pu-239	0.00%
	C-14	0.07%
	Fe-55	29.72%
	Ni-59	0.34%
	Ni-63	53.93%
	Sr-90	0.00%
	Tc-99	0.14%
	I-129	0.00%
	Am-241	0.00%
c. Evaporator Concentrates	N/A	N/A
d. Dewatered Mechanical Filters	N/A	N/A
e. Dewatered Demineralizers	N/A	N/A
f. Solidified (cement) Acids, Oils, Sludge	N/A	N/A
g. Other (add as necessary)	N/A	N/A

Attachment 3 Solid Radioactive Waste Disposal

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

2. Dry Solid Waste

a. Dry Active Waste (compacted)	N/A	N/A
	H-3	2.49%
	Cr-51	4.43%
	Mn-54	1.69%
	Co-57	0.04%
	Co-58	4.08%
	Fe-59	0.33%
	Co-60	28.35%
	Zn-65	0.62%
	Nb-95	3.22%
b. Dry Active Waste (non-compacted)	Zr-95	1.71%
	Sn-113	0.15%
	Sb-125	0.47%
	Cs-137	0.09%
	Ce-144	0.26%
	C-14	0.14%
	Fe-55	20.18%
	Ni-63	31.66%
	Tc-99	0.10%
	I-129	0.00%
	H-3	1.10%
	Be-7	0.09%
	Cr-51	5.32%
	Mn-54	2.69%
	Co-57	0.13%
	Co-58	19.80%
	Fe-59	0.42%
	Co-60	22.01%
	Zn-65	0.70%
	Nb-95	3.25%
	Zr-95	1.83%
c. Dry Active Waste (brokered)	Sn-113	0.26%
	Sb-124	0.03%
	Sb-125	0.49%
	Cs-134	0.00%
	Cs-137	0.23%
	Ce-144	0.43%
	C-14	0.18%
	Fe-55	19.46%
	Ni-59	0.21%
	Ni-63	20.91%
	Sr-89	0.21%
	Sr-90	0.20%
	Tc-99	0.05%
	I-129	0.00%
d. Irradiated Components	N/A	N/A
e. <i>Other (add as necessary)</i>	N/A	N/A

Attachment 4
Meteorological Data

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 4

Meteorological Data

This attachment includes a summary of meteorological joint frequency distributions of wind speed, wind direction, and atmospheric stability (hours of occurrence) at the lower level.

Attachment 4 Meteorological Data

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Stability Class	Wind Speed (m/s)	Hours of Occurrence															
		Sector															
		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW
A	0.46-0.75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	0.76-1.00	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	1.01-1.25	0	0	0	0	0	0	0	0	1	0	1	0	0	0	0	0
	1.26-1.50	0	0	0	0	0	0	0	0	0	1	0	1	2	0	0	0
	1.51-2.00	1	1	1	0	1	0	3	5	2	11	9	4	4	1	1	0
	2.01-3.00	6	7	2	2	4	4	9	20	19	72	67	16	9	8	7	3
	3.01-4.00	14	9	2	0	0	0	4	2	3	16	16	10	11	8	4	6
	4.01-5.00	15	21	4	0	0	0	0	1	0	2	7	5	1	1	0	4
	5.01-6.00	2	11	2	0	0	0	0	0	0	0	3	0	0	0	0	0
	6.01-8.00	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	8.01-10.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	10.01-max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B	0.46-0.75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	0.76-1.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	1.01-1.25	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0
	1.26-1.50	1	2	0	0	0	0	0	2	1	2	2	0	1	0	0	1
	1.51-2.00	1	1	0	0	0	2	3	10	2	11	17	15	5	1	0	1
	2.01-3.00	7	4	3	2	5	0	2	10	20	40	39	14	7	8	7	6
	3.01-4.00	16	11	0	0	1	0	0	1	1	5	2	6	9	6	0	1
	4.01-5.00	14	21	8	0	0	0	0	0	0	0	3	2	1	5	1	2
	5.01-6.00	3	5	4	0	0	0	0	0	0	0	2	0	0	1	1	4
	6.01-8.00	2	2	1	0	0	0	0	0	0	0	0	0	0	0	0	1
	8.01-10.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	10.01-max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Attachment 4 Meteorological Data

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Stability Class	Wind Speed (m/s)	Hours of Occurrence															
		Sector															
		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW
C	0.46-0.75	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	0.76-1.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	1.01-1.25	0	1	0	0	0	0	0	0	1	2	1	1	0	0	1	0
	1.26-1.50	0	0	0	0	0	0	1	2	6	5	2	1	0	1	1	0
	1.51-2.00	2	1	1	0	2	3	2	17	16	22	11	16	9	2	2	3
	2.01-3.00	13	6	1	3	0	4	4	18	13	29	27	13	10	13	5	4
	3.01-4.00	28	18	6	3	0	0	2	6	4	8	2	4	3	3	0	4
	4.01-5.00	18	29	9	0	0	0	0	0	0	1	0	2	0	2	7	7
	5.01-6.00	9	9	4	0	0	0	0	0	0	0	0	0	0	1	2	3
	6.01-8.00	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
	8.01-10.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0
	10.01-max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
D	0.46-0.75	0	0	0	0	0	0	0	0	2	2	2	0	0	0	0	0
	0.76-1.00	2	0	0	0	0	0	3	7	11	8	7	9	5	3	1	1
	1.01-1.25	1	2	1	0	3	4	10	10	30	28	21	11	13	7	12	1
	1.26-1.50	6	3	2	5	2	9	15	22	54	63	33	15	18	16	12	10
	1.51-2.00	32	13	4	5	7	10	21	51	108	94	70	32	14	23	20	31
	2.01-3.00	200	54	26	16	9	14	34	58	88	84	59	25	15	21	28	55
	3.01-4.00	207	176	90	22	8	2	19	16	23	28	13	5	3	14	13	37
	4.01-5.00	91	104	91	8	1	0	5	6	5	6	6	1	2	6	16	31
	5.01-6.00	30	30	18	8	0	1	1	8	3	0	0	3	0	5	5	19
	6.01-8.00	12	0	1	5	1	0	0	1	0	0	0	0	0	0	2	6
	8.01-10.00	2	1	0	0	0	2	1	0	0	0	0	0	0	0	0	0
	10.01-max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Attachment 4 Meteorological Data

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Stability Class	Wind Speed (m/s)	Hours of Occurrence															
		Sector															
		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW
E	0.46-0.75	0	0	0	0	0	0	1	0	6	8	3	5	3	3	0	1
	0.76-1.00	1	0	0	1	0	0	2	14	31	64	50	31	16	16	9	8
	1.01-1.25	3	1	0	0	2	0	0	13	57	87	59	24	31	15	20	4
	1.26-1.50	4	3	1	0	0	1	3	24	117	102	42	26	17	20	23	13
	1.51-2.00	19	1	3	2	4	4	5	30	123	99	44	20	22	33	29	51
	2.01-3.00	68	6	6	2	5	3	22	47	89	36	27	9	14	44	45	92
	3.01-4.00	26	12	4	3	1	7	16	18	11	21	18	5	4	6	24	21
	4.01-5.00	2	3	18	9	0	2	8	5	0	7	4	1	1	0	1	6
	5.01-6.00	5	0	5	0	0	1	1	0	0	0	0	0	0	0	1	1
	6.01-8.00	7	0	1	0	0	2	1	0	1	0	0	0	0	0	0	1
	8.01-10.00	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	10.01-max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
F	0.46-0.75	0	0	0	0	0	0	0	2	6	10	6	1	4	4	2	0
	0.76-1.00	1	1	0	0	0	0	0	3	30	55	19	18	7	9	10	4
	1.01-1.25	0	2	0	0	0	0	0	4	38	48	15	10	11	11	19	10
	1.26-1.50	1	0	0	0	0	0	0	2	30	23	14	10	7	7	22	17
	1.51-2.00	13	3	0	0	0	0	1	4	12	7	2	6	12	12	14	56
	2.01-3.00	37	0	0	0	0	0	1	8	0	1	0	0	3	9	2	22
	3.01-4.00	0	0	0	0	0	0	1	6	0	0	0	0	0	0	0	2
	4.01-5.00	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	5.01-6.00	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0
	6.01-8.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	8.01-10.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	10.01-max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Attachment 4 Meteorological Data

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Stability Class	Wind Speed (m/s)	Hours of Occurrence															
		Sector															
		N	NNE	NE	ENE	E	ESE	SE	SSE	S	SSW	SW	WSW	W	WNW	NW	NNW
G	0.46-0.75	1	0	0	0	0	0	0	0	11	9	7	9	5	5	3	0
	0.76-1.00	0	0	0	0	0	0	0	1	25	39	16	20	10	10	12	0
	1.01-1.25	0	0	0	0	1	0	0	0	18	42	27	9	10	6	9	9
	1.26-1.50	1	0	0	0	0	0	0	0	10	18	11	6	12	4	6	21
	1.51-2.00	3	0	0	0	0	0	0	0	1	3	7	3	5	4	3	9
	2.01-3.00	10	0	0	0	0	0	0	0	0	0	0	3	2	2	0	9
	3.01-4.00	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	4.01-5.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	5.01-6.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	6.01-8.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	8.01-10.00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	10.01-max	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Attachment 5
Unplanned Offsite Releases

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 5

Unplanned Offsite Releases

This attachment includes a summary of the unplanned offsite releases of gaseous and liquid radioactive effluents.

Attachment 5
Unplanned Offsite Releases

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Catawba Nuclear Station had no unplanned liquid releases in 2024.

Catawba Nuclear Station had no unplanned gaseous releases in 2024.

Attachment 6
Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 6

Assessment of Radiation Dose from Radioactive Effluents to Members of the Public
(includes fuel cycle dose calculation results)

This attachment includes an assessment of radiation doses to the maximum exposed member of the public due to radioactive liquid and gaseous effluents released from the site for each calendar quarter for the calendar year of the report as well as the total dose for the calendar year.

This attachment also includes an assessment of radiation doses to the maximum exposed member of the public from all uranium fuel cycle sources within 8 km of the site for the calendar year of this report to show conformance with 40 CFR Part 190.

Methods for calculating the dose contribution from liquid and gaseous effluents are given in the Offsite Dose Calculation Manual (ODCM).

Attachment 6 **Assessment of Radiation Dose from Radioactive Effluents to Members of the Public**

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Gaseous Effluents Dose Summary

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Noble Gases						
1. Maximum Gamma Air	mRAD	7.16E-03	6.49E-03	7.09E-03	5.11E-03	2.59E-02
(a) Limit	mRAD	1.00E+01	1.00E+01	1.00E+01	1.00E+01	2.00E+01
(b) % of Limit		7.16E-02	6.49E-02	7.09E-02	5.11E-02	1.29E-01
<u>Receptor Location</u>	0.5 miles	NNE	NNE	NNE	NNE	NNE
2. Maximum Beta Air	mRAD	2.65E-03	2.31E-03	2.58E-03	1.87E-03	9.42E-03
(a) Limit	mRAD	2.00E+01	2.00E+01	2.00E+01	2.00E+01	4.00E+01
(b) % of Limit		1.32E-02	1.16E-02	1.29E-02	9.37E-03	2.35E-02
<u>Receptor Location</u>	0.5 miles	NNE	NNE	NNE	NNE	NNE
B. Iodine, H-3, & Particulates						
1. Maximum Organ Dose	mREM	3.17E-01	3.17E-01	3.32E-01	2.86E-01	1.25E+00
(a) Limit	mREM	1.50E+01	1.50E+01	1.50E+01	1.50E+01	3.00E+01
(b) % of Limit		2.11E+00	2.11E+00	2.21E+00	1.91E+00	4.17E+00
<u>Receptor Location</u>	1.0 miles	N	N	N	N	N
<u>Critical Age</u>		CHILD	CHILD	CHILD	CHILD	CHILD
<u>Critical Organ</u>		BONE	BONE	BONE	BONE	BONE
<u>Critical Pathway</u>		VEGETA-TION	VEGETA-TION	VEGETA-TION	VEGETA-TION	VEGETA-TION

Attachment 6

Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Liquid Effluents Dose Summary

	<u>Units</u>	<u>Qtr 1</u>	<u>Qtr 2</u>	<u>Qtr 3</u>	<u>Qtr 4</u>	<u>Year</u>
A. Batch Mode						
1. Maximum Organ Dose	mREM	1.01E-01	3.31E-02	5.05E-02	1.24E-01	2.72E-01
(a) Limit	mREM	1.00E+01	1.00E+01	1.00E+01	1.00E+01	2.00E+01
(b) % of Limit		1.01E+00	3.31E-01	5.05E-01	1.24E+00	1.36E+00
<u>Critical Age</u>		Child	Adult	Adult	Adult	Adult
<u>Critical Organ</u>		Bone	GI-Lli	GI-Lli	GI-Lli	GI-Lli
<u>Critical Pathway</u>		Fresh Water Fish Sport (FFSP)	Fresh Water Fish Sport (FFSP)	Potable Water (PWtr)	Fresh Water Fish Sport (FFSP)	Fresh Water Fish Sport (FFSP)
2. Maximum Total Body Dose	mREM	7.83E-02	1.71E-02	4.08E-02	3.16E-02	1.56E-01
(a) Limit	mREM	3.00E+00	3.00E+00	3.00E+00	3.00E+00	6.00E+00
(b) % of Limit		2.61E+00	5.69E-01	1.36E+00	1.05E+00	2.61E+00
<u>Critical Age</u>		CHILD	CHILD	CHILD	CHILD	CHILD
<u>Critical Pathway</u>		POTABLE WATER (PWTR)	POTABLE WATER (PWTR)	POTABLE WATER (PWTR)	POTABLE WATER (PWTR)	POTABLE WATER (PWTR)
B. Continuous Mode						
1. Maximum Organ Dose	mREM	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
(a) Limit	mREM	1.00E+01	1.00E+01	1.00E+01	1.00E+01	2.00E+01
(b) % of Limit		0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
<u>Critical Age</u>		N/A	N/A	N/A	N/A	N/A
<u>Critical Organ</u>		N/A	N/A	N/A	N/A	N/A
<u>Critical Pathway</u>		N/A	N/A	N/A	N/A	N/A
2. Maximum Total Body Dose	mREM	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
(a) Limit	mREM	3.00E+00	3.00E+00	3.00E+00	3.00E+00	6.00E+00
(b) % of Limit		0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
<u>Critical Age</u>		N/A	N/A	N/A	N/A	N/A
<u>Critical Pathway</u>		N/A	N/A	N/A	N/A	N/A

Attachment 6 Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

40 CFR Part 190 Uranium Fuel Cycle Dose Calculation Results

In accordance with the requirements of 40 CFR Part 190, the annual dose commitment to any member of the general public shall be calculated to assure that doses are limited to 25 millirems to the total body or any organ with the exception of the thyroid which is limited to 75 millirems. The fuel cycle dose assessment for Catawba Nuclear Station includes liquid and gaseous effluent dose contributions from Catawba Nuclear Station and direct and air-scatter dose from the onsite ISFSI. No other uranium fuel cycle facility contributes significantly to the maximum exposed individual. Included in the gaseous effluent dose calculations is an estimate of the dose contributed by Carbon-14 (Ref. Attachment 2, Supplemental Information, of this report for further information). The combined dose to a maximum exposed individual from effluent releases and direct and air-scatter dose from the ISFSI is below 40 CFR Part 190 limits as shown by the following summary.

Note: The 40 CFR Part 190 effluent dose analysis to the maximum exposed individual from liquid and gas releases includes the dose from noble gases (i.e., total body and skin).

40 CFR Part 190 Effluent Dose Summary

A. Maximum Organ Dose (other than TB)	1.369E+00 mrem
1. Location	1.0 miles N
2. Critical Age	Child
3. Critical Organ	Bone
4. Gas Contribution %	91.460%
5. Liquid Contribution %	8.540%
B. Maximum Total Body Dose	5.952E-01 mrem
1. Location	1.0 miles N
2. Critical Age	Child
3. Gas non-NG Contribution %	72.790%
4. Gas NG Contribution %	0.926%
5. Liquid Contribution %	26.284%

Direct and air-scatter radiation dose contributions from the onsite ISFSI have been determined from the 10 CFR 72.212 Evaluation Report, MAGNASTOR®, Revision 5.

The attached excerpt from the 10 CFR 72.212 Evaluation Report, MAGNASTOR®, Revision 5 is provided to document the method used to calculate the dose from ISFSI as less than 15.2 mrem/yr to the nearest real individual.

Total dose from liquid and gaseous effluents from Catawba Nuclear Station and direct and air-scatter dose from the onsite ISFSI is estimated to be less than 5 mrem/yr to the nearest real individual. This meets the 40 CFR Part 190 requirements of an annual dose commitment to any member of the general public of less than 25 mrem total body or any organ and 75 mrem to the thyroid.

Attachment 6 Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

10 CFR 72.212 Evaluation Report, MAGNASTOR®, Revision 5

6.0 10 CFR 72.212(b)(5)(iii) - Radioactive Materials in Effluents and Direct Radiation

6.1 Purpose

10 CFR 72.212(b)(5)(iii) requires the general licensee to perform written evaluations, before use and before applying the changes authorized by an amended CoC to a cask loaded under the initial CoC or an earlier amended CoC, that establish that the requirements of 10 CFR 72.104 have been met. A copy of this record shall be retained until spent fuel is no longer stored under the general license issued under 10 CFR 72.210.

10 CFR 72.104 provides the regulatory criteria for radioactive materials in effluents and direct radiation from an ISFSI during normal operation and anticipated occurrences. Specifically, 10 CFR 72.104(a) limits the annual dose equivalent to any real individual who is located beyond the controlled area to 25 mrem to the whole body, 75 mrem to the thyroid, and 25 mrem to any other critical organ. This dose equivalent must include contributions from (1) planned discharges of radioactive materials (radon and its decay products excepted) to the general environment, (2) direct radiation from ISFSI operations, and (3) any other radiation from uranium fuel cycle operations within the region. In addition, 10 CFR 72.104(b) requires that operational restrictions be established to meet As Low As is Reasonably Achievable (ALARA) objectives for radioactive materials in effluents and direct radiation levels associated with ISFSI operations. Also, 10 CFR 72.104(c) requires that operational limits be established for radioactive materials in effluents and direct radiation levels associated with ISFSI operations to meet the above-mentioned dose limits.

This section provides the written evaluation required by 10 CFR 72.212(b)(5)(iii), demonstrating Duke Energy's compliance with the requirements of 10 CFR 72.104 for the CNS ISFSI.

6.2 Evaluation

This evaluation addresses the radiological dose rate from a composite population of all CNS ISFSI cask types.

6.2.1 §72.104(a) - Dose Limits

Duke Energy Calculation DPC-1229.00-00-0011, "Distance Measurements from ISFSI to Nearest Residents" determined that the nearest residence to the ISFSI is 0.35 miles (563.27 meters).

Within the quadrant that contains the residences closest to the ISFSI (NE), dose rate data from Revision 1 of calculation CNC1229.00-00-0061, "UMS Cask Array Dose Analysis for Duke Catawba (NAC International Calculation 12418-5004)" show a maximum annual total dose (gamma plus neutron) - at a distance of 535 meters from a 2x12 array of NAC-UMS® casks - to be approximately 3.2 mrem. The as-loaded evaluation was based on full cask loads of 24 fuel assemblies (45 GWd/MTU, 3.1 wt% U 235, and 27.6 years cooling) with burnable poison (BP) non-fuel inserts (28 GWd burnup and 17 years cooling). The cask decay heat load was conservatively assumed to be 20 kW. The distance at which this dose was calculated (535 meters) is conservative compared to the distance to the closest real individual.

Attachment 6

Assessment of Radiation Dose from Radioactive Effluents to Members of the Public

Catawba Nuclear Station Units 1 & 2 **Period 1/1/2024 - 12/31/2024**

Within the quadrant that contains the residences closest to the ISFSI (NE), dose rate data from Revision 2 of calculation CNC1229.00-00-0067, "MAGNASTOR Cask Array Dose Analysis for Duke Catawba (NAC Calculation 12418-5006)" show a maximum annual total dose (gamma plus neutron) - at a distance of 535 meters from both a 2x12 and a 2x6 array of MAGNASTOR® casks - to be approximately 7.0 mrem. The evaluation was conservatively based on full cask loads of 37 bounding fuel assemblies at a decay heat load of 35.5 kW. The distance at which this dose is calculated (535 meters) is conservative compared to the distance to the closest real individual.

The total calculated annual public dose from liquid and gaseous effluent pathways reviewed over the past 10 years is bounded by 5 mrem. No other uranium fuel cycle facility contributes significantly to the dose received by the closest real individual.

Based on the above, the calculated annual dose to the closest real individual due to the ISFSI, which is comprised of the currently existing 24 NAC-UMS® casks (Pad 1), one 2x12 array of MAGNASTOR® casks (Pad 2), and up to one 2x6 array of MAGNASTOR casks (Pad 3) is determined to be less than 10.2 mrem, and the estimated annual dose due to Catawba power generation is less than 5 mrem. Hence, the total annual dose to the closest real individual (less than 15.2 mrem) is within the 10 CFR 72.104(a) limit

The 2024 Land Use Census nearest actual residence is 0.56 miles (901 m NE) from Catawba. The estimated doses for a 2 x 12 array of NAC-UMS casks at 535 m, 2 x 12 array of MAGNASTOR casks at 535 m, and a 2x6 array of MAGNASTOR casks at 535 m can be reasonably approximated as point sources (distance from the ISFSI is much greater than the size of the ISFSI) to determine a dose of 3.596 mrem direct radiation dose at the nearest resident distance of 901 m. Combined with the dose from effluents, maximum organ dose from Catawba is 4.965 mrem and maximum total body dose is 4.1912 mrem, which are below the dose limits of 40 CFR 190.

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 7

Information to Support the NEI Ground Water Protection Initiative

This attachment includes a summary of voluntary reports made in accordance with the NEI Ground Water Protection Initiative and a summary of ground water well sample data.

Attachment 7 Information to Support the NEI Ground Water Protection Initiative

Catawba Nuclear Station Units 1 & 2 Period 1/1/2024 - 12/31/2024

Duke Energy implemented a Ground Water Protection program in 2007. This initiative was developed to ensure timely and effective management of situations involving inadvertent releases of licensed material to ground water. As part of this program, Catawba Nuclear Station monitored 48 wells and 1 outfall from the Conventional Wastewater Treatment Ponds in 2024.

Wells are typically sampled quarterly or semi-annually. Ground water samples are regularly analyzed for tritium and gamma emitters, with select wells being analyzed for difficult-to-detect radionuclides. Results from sampling during 2024 confirmed existing knowledge of tritium concentrations in site ground water.

In June of 2022, Groundwater Well C-105R was damaged and can no longer be used as a GWPI monitoring well and was declared abandoned as a result. The groundwater well C-105R was not required to meet groundwater monitoring requirements described in AD-CP-ALL-0017 and abandonment of this well does not impact ability to collect regulatory required samples.

Tritium results from sampling during 2024 are shown in the table below.

No events meeting the criteria for voluntary notification per NEI 07-07, Industry Ground Water Protection Initiative, occurred at Catawba Nuclear Station in 2024.

Key to below table.

NS	-	Not scheduled to be sampled, not sampled due to insufficient volume in well, or well inaccessible during outage.
pCi/l	-	picocuries per liter.
< MDA	-	less than minimum detectable activity, typically 250 pCi/l.
20,000 pCi/l	-	the Environmental Protection Agency drinking water standard for tritium. This standard applies only to water used for drinking.
1,000,000 pCi/l	-	the 10 CFR Part 20, Appendix B, Table 2, Column 2, Effluent Concentration Limit for tritium.

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Well Name	Location / Description	Tritium Concentration (pCi/l)				# of Samples
		1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	
C-100DR	CNS GWPI / C-100DR / U-1 SFP	<MDA	3.04E+02	<MDA	2.84E+02	4
C-101DR	CNS GWPI / C-101DR / U-1 SFP	2.58E+02	3.47E+02	1.98E+02	2.52E+02	4
C-101R	CNS GWPI / C-101R / U-1 SFP	5.09E+02	6.36E+02	3.66E+02	5.52E+02	4
C-102	CNS GWPI / C-102 / E of U1 SFP O/S protected area	<MDA	NS	2.42E+02	NS	2
C-103	CNS GWPI / C-103 / E of U1 SFP @ Cooling Towers	2.47E+02	NS	2.15E+02	NS	2
C-104	CNS GWPI / C-104 / U-1 RMWST	4.73E+02	5.89E+02	4.48E+02	4.42E+02	4
C-105	CNS GWPI / C-105 / Engr. Bldg.	9.63E+02	8.70E+02 8.62E+02	7.11E+02 4.96E+02 3.95E+02	4.20E+02	7
C-106	CNS GWPI / C-106 / W Parking Lot	<MDA	NS	<MDA	NS	2
C-106R	CNS GWPI / C-106R / W Parking Lot	<MDA	NS	<MDA	NS	2
C-107	CNS GWPI / C-107 / MET Tower Hill	4.62E+02	6.08E+02	5.83E+02	4.05E+02	4
C-108	CNS GWPI / C-108 /	9.64E+02	NS	<MDA	NS	2
C-109	CNS GWPI / C-109 /	6.57E+02	NS	5.29E+02	NS	2
C-110	CNS GWPI / C-110 /	1.25E+03	1.44E+03	1.12E+03	8.64E+02	4
C-200DR	CNS GWPI / C-200DR / U-2 SFP	4.73E+02	5.54E+02	2.60E+02	4.87E+02	4
C-200R	CNS GWPI / C-200R / U-2 SFP	5.45E+02	7.38E+02	4.15E+02	4.86E+02	4
C-201DR	CNS GWPI / C-201DR / U-2 SFP	6.33E+02	5.42E+02	2.94E+02	3.08E+02	4
C-201R	CNS GWPI / C-201R / U-2 SFP	1.72E+03	1.61E+03	1.62E+03	1.52E+03	4
C-202	CNS GWPI / C-202 / S of RMC Tent	6.59E+02	NS	5.99E+02	NS	2
C-203	CNS GWPI / C-203 / E of RMC Tent @ Cooling Towers	2.74E+02	NS	4.93E+02	NS	2
C-204	CNS GWPI / C-204 / S of RMC Tent	4.92E+02	NS	6.04E+02	NS	2
C-205	CNS GWPI / C-205 / Adm. Parking	<MDA	<MDA	<MDA	<MDA	4
C-205R	CNS GWPI / C-205R / Adm. Parking	<MDA	<MDA	<MDA	<MDA	4
C-206	CNS GWPI / C-206 / W Parking Lot	<MDA	NS	<MDA	NS	2
C-207	CNS GWPI / C-207 / Mon. Tank B	2.77E+02	3.89E+02	4.99E+02	6.46E+02	4
C-207R	CNS GWPI / C-207R / Mon. Tank B	<MDA	<MDA	3.16E+02	4.78E+02	4
C-208	CNS GWPI / C-208 / N of MTB	<MDA	NS	<MDA	NS	2
C-209	CNS GWPI / C-209 / MTUville S of light pole 23A	<MDA	2.11E+02	2.27E+02	3.03E+02	4
C-210	CNS GWPI / C-210 / N of U2 Mech Equip Bldg	2.69E+02	NS	2.79E+02	NS	2
C-211	CNS GWPI / C-211 / W of RL Intake O/S Protected Area	2.35E+02	NS	3.96E+02	NS	2
C-212	CNS GWPI / C-212 / Behind Aquatic Center	<MDA	<MDA	<MDA	<MDA	4
C-213	CNS GWPI / C-213 / Mon. Tank B	1.76E+03	2.01E+03	2.09E+03	2.33E+03	4
C-213R	CNS GWPI / C-213R / Mon. Tank B	<MDA	<MDA	<MDA	<MDA	4
C-214	CNS GWPI / C-214 / N of U2 TB	6.28E+02	6.74E+02	6.87E+02	6.79E+02	4
C-215	CNS GWPI / C-215 / N of U2 TB	3.33E+02	2.75E+02	2.11E+02	4.47E+02	4

Attachment 7
Information to Support the NEI Ground Water Protection Initiative

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

C-217	CNS GWPI / C-217 / N of U2 TB	5.35E+02	NS	7.48E+02	NS	2
C-218	CNS GWPI / C-218 / N of U2 TB	2.39E+02	<MDA	<MDA	3.30E+02	4
C-220	CNS GWPI / C-220 / N of U2 TB	4.00E+02	5.45E+02	7.34E+02	7.02E+02	4
C-221	CNS GWPI / C-221 / N of U2 TB	3.09E+02	3.50E+02	4.19E+02	4.47E+02	4
LMW-1B	CNS Landfill / LMW-1B / Landfill	NS	NS	<MDA	NS	1
LMW-2A	CNS Landfill / LMW-2A / Landfill	NS	NS	<MDA	NS	1
LMW-3A	CNS Landfill / LMW-3A / Landfill	NS	NS	<MDA	NS	1
LMW-4	CNS Landfill / LMW-4 / Landfill	NS	NS	<MDA	NS	1
LMW-5D	CNS Landfill / LMW-5D / Landfill	NS	NS	<MDA	NS	1
LMW-5S	CNS Landfill / LMW-5S / Landfill	NS	NS	2.20E+02	NS	1
OUTFALL017	CNS WC Ponds / OUTFALL-017 / WC Ponds	7.44E+02	4.85E+02	1.76E+03	1.21E+03	4
WCMW-2	CNS WC Ponds / WCMW-2 / WC Ponds	2.28E+03	2.37E+03	2.69E+03 2.01E+03	2.44E+03	5
WCMW-3	CNS WC Ponds / WCMW-3 / WC Ponds	1.03E+03	1.40E+03	9.25E+02 1.24E+03	1.26E+03	5
WCMW-4	CNS WC Ponds / WCMW-4 / WC Ponds	2.88E+02	3.99E+02	5.22E+02 4.38E+02	4.86E+02	5
WCMW-5	CNS WC Ponds / WCMW-5 / WC Ponds	<MDA	1.91E+02	<MDA <MDA 2.00E+02 <MDA	2.65E+02	7

Attachment 8
Inoperable Equipment

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 8

Inoperable Equipment

This attachment includes an explanation of inoperable instruments related to effluent monitoring in excess of allowed time defined by licensing bases and an explanation of temporary outside liquid storage tanks exceeding 10 Curies total activity (excluding tritium and dissolved or entrained noble gases).

Attachment 8 Inoperable Equipment

Catawba Nuclear Station Units 1 & 2 Period 1/1/2024 - 12/31/2024

Catawba Nuclear Station had two instances of any inoperable equipment relevant to effluent monitoring in excess of SLC 16.11 limits during 2024. Details are discussed below.

Catawba Nuclear Station did not experience any temporary unprotected outside liquid storage tanks exceeding 10 Curies total activity (excluding tritium and dissolved or entrained noble gases) during 2024.

SLC # from Table 16.11-2	Title	Completion Time	Determination and Data Reviewed
1.c	Monitor Tank Building Liquid Discharge Monitor (EMF-57 – Low Range)	14 days	For OEMF-57, out of service time was a total of 19.97 days (12/20/2023 10:18 am to 1/09/2024 09:29 AM) LCOTR A-0-23-01596. NCR's: 02498978, 02499049. WR's: 20260954

Description: The Monitor Tank Building Liquid Discharge Monitor (EMF-57 – Low Range) was declared Non-Functional on 12/20/23 at 10:18 due to the instrument failing to pass a counter test as part of channel calibration. EMF57 was restored to FUNCTIONAL status on 1/09/2024 at 09:29 AM.

WR 20260954 (OEMF-57: FAILED CHANNEL CALIBRATION CHECKS) was generated on 12/21/2023 after the detector failed to pass counter test. The as found counts when installing Cesium and Barium sources didn't cause an increase in counts using the HP counter, while the RM80 display counts did increase. The work request was marked as complete on 1/10/2024.

NCR 02498978 (OEMF57 failed testing during performance of channel calibration) was generated after the "as found" count rates that are obtained with an external HP counter didn't increase with sources installed during the performance of the calibration procedure for OEMF57.

NCR 02499049 (OP/0/B/6500/060 Rev.056) was generated as a proposed enhancement to enclosure 4.6 of OP/0/B/6500/060. Per the report, initial condition requiring OEMF-57 to be non-functional for less than or equal to 14 days is associated with SLC 16.11-2 (Radioactive Liquid Effluent Monitoring Instrumentation). AR 01481359 (formerly PIP C-10-02398) outlines why this requirement was added to this procedure, and it is based on a previous revision of SLC 16.11-2. Since Revision 5 of this SLC, we are required to comply with Condition G (Explain why non-functionality was not corrected in next ARERR per TS 5.6.3) if OEMF-57 is non-functional for greater than 14 days regardless of whether a release is performed via this pathway. As a result, there is no SLC 16.11-2 required time limit beyond which releases should not be continued with OEMF-57 non-functional. In theory, releases could continue indefinitely with OEMF-57 non-functional so long as the required actions of Condition C (Analyze two independent samples, IV of discharge line valving, etc.) are complied with. The procedure for releases with OEMF-57 non-functional needs to be revised to reflect this reality.

Attachment 8 Inoperable Equipment

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

SLC # from Table 16.11-2	Title	Completion Time	Determination and Data Reviewed
1.a	RL Min Flow Interlock	30 days	For RL Min Flow Interlock, out of service time for 2024 was 48.97 days (4/16/2024 02:14:00 AM to 6/17/2024 04:28:00 PM) LCOTR A-0-24-00573. NCR's: 02516391. WR's: 20267240.
Description: The Low-Pressure Service Water Minimum Flow Interlock was declared Non-Functional on 4/16/2024 at 02:14 due to erratic instrumentation with low RL discharge flows to Lake Wylie. WR 20267240 (0RL P 5080: FLOW IS ERRATIC RESULTING LOW RL FLOW ALARM) was generated on 3/22/2022 11:29 to address the erratic readings resulting in RL flow going below LWR minimum flow setpoint. Initial troubleshooting was unable to identify any signs of damage or improper configuration. The component vendor, along with the assistance of FIN2, removed sensor covers and found enough water under the cover to suspect corrosion of the connector pins on the sensors. Upon further inspection some pin connections were found completely disconnected. Those were repaired and reconnected and labeled by vendor. RL was declared functional in 6/17/2024 at 4:28 pm. NCR 02516391 (RL Minimum Flow Interlock has Exceeded its SLC required Completion time limit) was generated to explain why the non-functionality was not corrected within the specified completion time. Per SLC 16.11-2 (Radioactive Liquid Effluent Monitoring Instrumentation), Condition G must be entered when the RL Minimum Flow Interlock is Non-Functional for >30 days.			

Attachment 9
Offsite Dose Calculation Manual (ODCM) and Summary of Changes to the ODCM

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 9

Offsite Dose Calculation Manual (ODCM) and Summary of Changes to the ODCM

This attachment includes a summary of changes to the ODCM and Radiological Effluent Controls.

Attachment 9

Offsite Dose Calculation Manual (ODCM) and Summary of Changes to the ODCM

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ODCM Revision 64

ODCM Revision 64 was approved by the Radiation Protection Manager on 12/30/2020. No revisions to the ODCM were approved during 2024.

Radiological Effluent Controls (SLC 16.11)

The Catawba Nuclear Station Radiological Effluent Controls are contained in SLC 16.11 shown in this section.

There was one revision to the Catawba Nuclear Station Updated Final Safety Analysis Report, Section 16.11, Radiological Controls, in 2024:

- SLC 16.11-7, Radioactive Gaseous Effluent Monitoring Instrumentation, Rev. 15, was implemented on 3/12/2024. This revision modifies the applicable modes of Conditions B and K for the Containment Air Release and Addition System Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-39 – Low Range), from “All times” to Modes 1-6, as shown in Table 16.11-7-1. As a result, conditions B and K are no longer applicable “at all times” for the overall commitment, and conditions are now applicable as shown in Table 16.11-7-1.

As per TS 5.5.5.b, "Licensee initiated changes to the Radiological Effluent Controls of the UFSAR," Catawba is attaching the entire Section 16.11 of the UFSAR and List of Effective Sections (LOES) which will demonstrate when the above revision was received. Revisions 118-120 of the LOES are included as they include all changes approved in 2024.

LIST OF EFFECTIVE SECTIONS

<u>SECTION</u>	<u>REVISION NUMBER</u>	<u>REVISION DATE</u>
TABLE OF CONTENTS	17	10/20/22
16.1	1	08/27/08
16.2	3	08/17/22
16.3	1	08/21/09
16.5-1	7	03/30/21
16.5-2	Deleted	
16.5-3	2	09/19/19
16.5-4	1	01/27/22
16.5-5	1	01/28/10
16.5-6	3	08/17/22
16.5-7	2	02/06/15
16.5-8	Deleted	
16.5-9	Deleted	03/02/21
16.5-10	Deleted	
16.6-1	0	10/09/02
16.6-2	Deleted	
16.6-3	2	01/27/22
16.6-4	3	08/17/22
16.6-5	3	07/07/20
16.7-1	1	08/21/09
16.7-2	4	02/03/11
16.7-3	6	06/15/23
16.7-4	Deleted	
16.7-5	7	06/01/22

LIST OF EFFECTIVE SECTIONS

<u>SECTION</u>	<u>REVISION NUMBER</u>	<u>REVISION DATE</u>
16.7-6	3	06/10/16
16.7-7	2	06/14/22
16.7-8	2	08/21/09
16.7-9	15	08/17/22
16.7-10	10	01/27/22
16.7-11	1	08/21/09
16.7-12	1	08/21/09
16.7-13	3	06/10/16
16.7-14	1	08/21/09
16.7-15	3	02/23/23
16.7-16	0	06/08/09
16.7-17	0	02/10/15
16.7-18	0	05/10/16
16.8-1	8	01/27/22
16.8-2	4	1/31/24
16.8-3	3	11/28/22
16.8-4	2	11/05/07
16.8-5	3	08/21/09
16.9-1	10	01/29/19
16.9-2	6	08/03/17
16.9-3	5	07/03/18
16.9-4	5	09/11/17
16.9-5	11	10/08/19
16.9-6	12	07/03/18

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16.9-7	4	08/21/09
16.9-8	6	06/15/23
16.9-9	3	08/21/09
16.9-10	5	08/21/09
16.9-11	3	08/21/09
16.9-12	3	02/10/15
16.9-13	4	09/27/16
16.9-14	1	09/25/06
16.9-15	2	08/21/09
16.9-16	2	08/21/09
16.9-17	0	10/09/02
16.9-18	Deleted	
16.9-19	3	02/20/12
16.9-20	0	10/09/02
16.9-21	1	10/13/16
16.9-22	3	08/17/22
16.9-23	5	08/03/17
16.9-24	2	10/24/06
16.9-25	2	08/21/09
16.9-26	1	11/15/18
16.10-1	1	08/21/09
16.10-2	1	10/24/06
16.10-3	1	08/21/09
16.10-4	0	08/04/20

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16.11-1	1	07/27/13
16.11-2	9	07/07/22
16.11-3	0	10/09/02
16.11-4	1	08/21/09
16.11-5	0	10/09/02
16.11-6	3	08/03/15
16.11-7	15	03/12/24
16.11-8	0	10/09/02
16.11-9	0	10/09/02
16.11-10	1	08/21/09
16.11-11	1	03/20/03
16.11-12	0	10/09/02
16.11-13	1	07/27/13
16.11-14	0	10/09/02
16.11-15	0	10/09/02
16.11-16	1	10/24/11
16.11-17	0	10/09/02
16.11-18	1	08/21/09
16.11-19	0	10/09/02
16.11-20	3	11/21/19
16.11-21	0	10/09/02
16.12-1	0	10/09/02
16.13-1	1	08/03/17
16.13-2	Deleted	

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<u>SECTION</u>	<u>REVISION NUMBER</u>	<u>REVISION DATE</u>
16.13-3	Deleted	
16.13-4	4	10/04/21

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16.3	1	08/21/09
16.5-1	7	03/30/21
16.5-2	Deleted	
16.5-3	2	09/19/19
16.5-4	1	01/27/22
16.5-5	1	01/28/10
16.5-6	3	08/17/22
16.5-7	2	02/06/15
16.5-8	Deleted	
16.5-9	Deleted	03/02/21
16.5-10	Deleted	
16.6-1	0	10/09/02
16.6-2	Deleted	
16.6-3	2	01/27/22
16.6-4	3	08/17/22
16.6-5	3	07/07/20
16.7-1	1	08/21/09
16.7-2	4	02/03/11
16.7-3	6	06/15/23
16.7-4	Deleted	
16.7-5	7	06/01/22

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16.7-7	2	06/14/22
16.7-8	2	08/21/09
16.7-9	15	08/17/22
16.7-10	10	01/27/22
16.7-11	1	08/21/09
16.7-12	1	08/21/09
16.7-13	3	06/10/16
16.7-14	1	08/21/09
16.7-15	3	02/23/23
16.7-16	0	06/08/09
16.7-17	0	02/10/15
16.7-18	0	05/10/16
16.8-1	8	01/27/22
16.8-2	4	1/31/24
16.8-3	3	11/28/22
16.8-4	2	11/05/07
16.8-5	3	08/21/09
16.9-1	10	01/29/19
16.9-2	6	08/03/17
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16.9-5	12	06/27/24
16.9-6	12	07/03/18

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16.9-13	4	09/27/16
16.9-14	1	09/25/06
16.9-15	2	08/21/09
16.9-16	2	08/21/09
16.9-17	0	10/09/02
16.9-18	Deleted	
16.9-19	3	02/20/12
16.9-20	0	10/09/02
16.9-21	1	10/13/16
16.9-22	3	08/17/22
16.9-23	5	08/03/17
16.9-24	2	10/24/06
16.9-25	2	08/21/09
16.9-26	1	11/15/18
16.10-1	1	08/21/09
16.10-2	1	10/24/06
16.10-3	1	08/21/09
16.10-4	0	08/04/20

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16.11-2	9	07/07/22
16.11-3	0	10/09/02
16.11-4	1	08/21/09
16.11-5	0	10/09/02
16.11-6	3	08/03/15
16.11-7	15	03/12/24
16.11-8	0	10/09/02
16.11-9	0	10/09/02
16.11-10	1	08/21/09
16.11-11	1	03/20/03
16.11-12	0	10/09/02
16.11-13	1	07/27/13
16.11-14	0	10/09/02
16.11-15	0	10/09/02
16.11-16	1	10/24/11
16.11-17	0	10/09/02
16.11-18	1	08/21/09
16.11-19	0	10/09/02
16.11-20	3	11/21/19
16.11-21	0	10/09/02
16.12-1	0	10/09/02
16.13-1	1	08/03/17
16.13-2	Deleted	

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<u>SECTION</u>	<u>REVISION NUMBER</u>	<u>REVISION DATE</u>
16.13-3	Deleted	
16.13-4	4	10/04/21

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16.3	1	08/21/09
16.5-1	7	03/30/21
16.5-2	Deleted	
16.5-3	2	09/19/19
16.5-4	1	01/27/22
16.5-5	1	01/28/10
16.5-6	3	08/17/22
16.5-7	2	02/06/15
16.5-8	Deleted	
16.5-9	Deleted	03/02/21
16.5-10	Deleted	
16.6-1	0	10/09/02
16.6-2	Deleted	
16.6-3	2	01/27/22
16.6-4	3	08/17/22
16.6-5	3	07/07/20
16.7-1	1	08/21/09
16.7-2	4	02/03/11
16.7-3	6	06/15/23
16.7-4	Deleted	
16.7-5	7	06/01/22

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16.7-6	3	06/10/16
16.7-7	2	06/14/22
16.7-8	2	08/21/09
16.7-9	15	08/17/22
16.7-10	10	01/27/22
16.7-11	1	08/21/09
16.7-12	1	08/21/09
16.7-13	3	06/10/16
16.7-14	1	08/21/09
16.7-15	3	02/23/23
16.7-16	0	06/08/09
16.7-17	0	02/10/15
16.7-18	0	05/10/16
16.8-1	8	01/27/22
16.8-2	4	1/31/24
16.8-3	3	11/28/22
16.8-4	2	11/05/07
16.8-5	3	08/21/09
16.9-1	11	11/18/24
16.9-2	6	08/03/17
16.9-3	5	07/03/18
16.9-4	5	09/11/17
16.9-5	12	06/27/24
16.9-6	12	07/03/18

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16.9-7	4	08/21/09
16.9-8	6	06/15/23
16.9-9	3	08/21/09
16.9-10	5	08/21/09
16.9-11	3	08/21/09
16.9-12	3	02/10/15
16.9-13	4	09/27/16
16.9-14	1	09/25/06
16.9-15	2	08/21/09
16.9-16	2	08/21/09
16.9-17	0	10/09/02
16.9-18	Deleted	
16.9-19	3	02/20/12
16.9-20	0	10/09/02
16.9-21	1	10/13/16
16.9-22	3	08/17/22
16.9-23	6	11/18/24
16.9-24	2	10/24/06
16.9-25	2	08/21/09
16.9-26	1	11/15/18
16.10-1	1	08/21/09
16.10-2	1	10/24/06
16.10-3	1	08/21/09
16.10-4	0	08/04/20

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16.10-5	2	09/07/22
16.11-1	1	07/27/13
16.11-2	9	07/07/22
16.11-3	0	10/09/02
16.11-4	1	08/21/09
16.11-5	0	10/09/02
16.11-6	3	08/03/15
16.11-7	15	03/12/24
16.11-8	0	10/09/02
16.11-9	0	10/09/02
16.11-10	1	08/21/09
16.11-11	1	03/20/03
16.11-12	0	10/09/02
16.11-13	1	07/27/13
16.11-14	0	10/09/02
16.11-15	0	10/09/02
16.11-16	1	10/24/11
16.11-17	0	10/09/02
16.11-18	1	08/21/09
16.11-19	0	10/09/02
16.11-20	3	11/21/19
16.11-21	0	10/09/02
16.12-1	0	10/09/02
16.13-1	1	08/03/17
16.13-2	Deleted	

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<u>SECTION</u>	<u>REVISION NUMBER</u>	<u>REVISION DATE</u>
16.13-3	Deleted	
16.13-4	4	10/04/21

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-1 Liquid Effluents

COMMITMENT: The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see Figure 16.11-16-1 in SLC 16.11-16) shall be limited to:

- a. For radionuclides other than dissolved or entrained noble gases, 10 times the effluent concentrations specified in 10 CFR Part 20, Appendix B, Table 2, Column 2, and
- b. For dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} microCurie/ml total activity.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS not within limits.	A.1 Restore the concentration to within limits.	Immediately

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-1-1 -----NOTE----- 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. ----- Sample and analyze radioactive liquid wastes according to Table 16.11-1-1.	According to Table 16.11-1-1

Table 16.11-1-1

Radioactive Liquid Waste Sampling and Analysis Program (page 1 of 3)

LIQUID RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) ⁽¹⁾ ($\mu\text{Ci/ml}$)
1. Batch Waste Release Tanks ⁽²⁾ Any tank which discharges liquid wastes by either liquid effluent monitor, EMF- 49 or EMF-57	Prior to each release Each Batch	Prior to each release Each Batch	Principal Gamma Emitters ⁽³⁾	5×10^{-7}
			I-131	1×10^{-6}
	Prior to each release One Batch/31 days	31 days	Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
	Prior to each release Each Batch	31 days Composite ⁽⁴⁾	H-3	1×10^{-5}
			Gross Alpha	1×10^{-7}
	Prior to each release Each Batch	92 days Composite ⁽⁴⁾	Sr-89, Sr-90	5×10^{-8}
2. Continuous Releases ⁽⁵⁾ Conventional Waste Water Treatment Line	Continuous ⁽⁶⁾	7 days Composite ⁽⁶⁾	Principal Gamma Emitters ⁽³⁾	5×10^{-7}
			I-131	1×10^{-6}
	31 days Grab Sample	31 days	Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
	Continuous ⁽⁶⁾	31 days Composite ⁽⁶⁾	H-3	1×10^{-5}
			Gross Alpha	1×10^{-7}
	Continuous ⁽⁶⁾	92 days Composite ⁽⁶⁾	Sr-89, Sr-90	5×10^{-8}

Table 16.11-1-1

Radioactive Liquid Waste Sampling and Analysis Program (page 2 of 3)

NOTES:

- (1) The LLD is defined, for purposes of these commitments, 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:

$$LLD = \frac{(2.71/T) + 4.65 s_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

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

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

E = the counting efficiency (counts per disintegration),

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

2.22×10^6 = the number of disintegrations per minute per microCurie,

Y = the fractional radiochemical yield, when applicable,

λ = the radioactive decay constant for the particular radionuclide (sec^{-1}),

Δt = the elapsed time between midpoint of sample collection and time of counting (sec), and

T = the sample counting time (min).

Typical values of E, V, Y and Δt shall be used in the calculation.

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

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

Table 16.11-1-1

Radioactive Liquid Waste Sampling and Analysis Program (page 3 of 3)

- (3) The principal gamma emitters for which the LLD specification applies include the following radionuclides:
- Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, and Ce-141. The LLD for Ce-144 is 5×10^{-6} $\mu\text{Ci/ml}$. 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 Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3 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 non-discrete volume, e.g., from a volume of a system that has an input flow during the continuous release.
- (6) To be representative of the quantities and concentrations of radioactive materials in liquid effluents, samples shall be collected continuously in proportion to the rate of flow of the effluent stream. Prior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.

BASES

The basic requirements for SLCs concerning effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent SLCs will keep average annual releases of radioactive material in effluents to small percentages of the limits specified in the old 10 CFR 20.106 (new 10 CFR 20.1302). These requirements further indicate that operational flexibility is allowed, compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which references Appendix B, Table II concentrations (MPCs). These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials in effluents as low as is reasonably achievable (ALARA) as set forth in 10 CFR 50, Appendix I.

As stated in the Introduction to Appendix B of the new 10 CFR 20, the liquid effluent concentration (EC) limits given in Appendix B, Table 2, Column 2, are based on an annual dose of 50 mrem. Since a release concentration corresponding to a limiting dose rate of 500 mrem/year has been acceptable as a SLC limit for liquid effluents, which applies at all times as an assurance that the limits of 10 CFR 50, Appendix I are not likely to be exceeded, it should not be necessary to reduce this limit by a factor of 10.

Operational history at Catawba has demonstrated that the use of the concentration values associated with the old 10 CFR 20.106 as SLC limits has resulted in calculated maximum individual doses to a MEMBER OF THE PUBLIC that are small percentages of the limits of 10 CFR 50, Appendix I. Therefore, the use of concentration values which correspond to an annual dose of 500 mrem (ten times the concentration values stated in the new 10 CFR 20, Appendix B, Table 2, Column 2) should not have a negative impact on the ability to continue to operate within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

Having sufficient operational flexibility is especially important in establishing a basis for effluent monitor setpoint calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, relate to a dose of 50 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 mrem/year. This low value is impractical upon which to base effluent monitor setpoint calculations for many liquid effluent release situations when monitor background, monitor sensitivity, and monitor performance must be taken into account.

Therefore, to accommodate operational flexibility needed for effluent releases, the limits associated with SLC 16.11-1 are based on ten times the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, to apply at all times. The multiplier of ten is proposed because the annual dose of 500 mrem, upon which the concentrations in the old 10 CFR 20, Appendix B, Table II, Column 2, are based, is a factor of 10 higher than annual dose of 50 mrem, upon which the concentrations in the new 10 CFR

BASES (continued)

20, Appendix B, Table 2, Column 2, are based. Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I and 40 CFR 190. The concentration limit for dissolved or entrained noble gases is based upon the assumption that Xe-135 is the controlling radioisotope and its MPC 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 commitment 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 HASL Procedures Manual, HASL-300 (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination – Application to Radiochemistry," Annal. Chem. 40, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 20, Appendix B.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-2 Radioactive Liquid Effluent Monitoring Instrumentation

COMMITMENT The Radioactive Liquid Effluent Monitoring Instrumentation channels shown in Table 16.11-2-1 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of SLC 16.11-1 are not exceeded.

AND

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: Condition Applicability is as shown in Table 16.11-2-1.

REMEDIAL ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

Radioactive Liquid Effluent Monitoring Instrumentation
16.11-2

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Radioactive Liquid Effluent Monitoring Instrumentation channel(s) Alarm/Trip Setpoint less conservative than required.	A.1 Suspend the release of radioactive liquid effluents monitored by the affected channel(s).	Immediately
	<u>OR</u> A.2 Declare the channel(s) non-functional.	Immediately
B. One or more Radioactive Liquid Effluent Monitoring Instrumentation channel(s) non-functional.	B.1 Enter the applicable Conditions and Required Actions specified in Table 16.11-2-1 for the channel(s).	Immediately
	<u>AND</u> B.2.1 Restore channel to FUNCTIONAL status.	14 Days (*Note 1)
	<u>OR</u> B.2.2 Restore channel to FUNCTIONAL status.	30 Days (*Note 1)

*Note 1 – Required Action B.2.1 Applies to Instruments 1.a and 1.c ONLY. (continued)
Required Action B.2.2 Applies to the remainder of required Instruments listed in Table 16.11-2-1.

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One channel non-functional.	C.1.1 Analyze two independent samples per Testing Requirement 16.11-1-1. <u>AND</u>	Prior to initiating a release
	C.1.2 Perform independent verification of the discharge line valving. <u>AND</u>	Prior to initiating a release
	C.1.3.1 Perform independent verification of manual portion of the computer input for release rate calculations performed by computer. <u>OR</u>	Prior to initiating a release
	C.1.3.2 Perform independent verification of entire calculations for release rate calculations performed manually. <u>OR</u>	Prior to initiating a release
	C.2 Suspend release of radioactive effluents via this pathway.	Immediately

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One flow rate measurement device channel non-functional.	D.1 -----NOTE----- Pump performance curves generated in place may be used to estimate flow. ----- Estimate the flow rate of the release.	Once per 4 hours during releases
E. One channel non-functional.	E.1 Perform an analysis of grab samples for radioactivity at a lower limit of detection of 10^{-7} microCurie/ml.	Once per 12 hours during releases when secondary specific activity is > 0.01 microCurie/gm DOSE EQUIVALENT I-131 <u>AND</u> Once per 24 hours during releases when secondary specific activity is ≤ 0.01 microCurie/gm DOSE EQUIVALENT I-131

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. One channel non-functional.	F.1 Collect and analyze grab samples for principal gamma emitters (listed in Table 16.11-1-1, NOTE 3) at a lower limit of detection of no more than 5×10^{-7} microCurie/ml.	Once per 12 hours
G. Required Action and associated Completion Time of Condition B not met.	G.1 Explain why the non-functionality was not corrected within the specified Completion Time.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

-----NOTE-----

Refer to Table 16.11-2-1 to determine which TRs apply for each Radioactive Liquid Effluent Monitoring Instrumentation channel.

TEST	FREQUENCY
TR 16.11-2-1 Perform CHANNEL CHECK.	24 hours
TR 16.11-2-2 -----NOTE----- The CHANNEL CHECK shall consist of verifying indication of flow. ----- Perform CHANNEL CHECK.	24 hours during periods of release
TR 16.11-2-3 Perform SOURCE CHECK.	Prior to each release
TR 16.11-2-4 Perform SOURCE CHECK.	31 days
TR 16.11-2-5 Perform COT.	182 days
TR 16.11-2-6 -----NOTE----- For Instrument 1, the COT shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation (for EMF-57, alarm annunciation is in the Monitor Tank Building control room and on the Monitor Tank Building control panel remote annunciator panel) occur if any of the following conditions exist: a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or b. Circuit failure/instrument downscale failure (alarm only) ----- Perform COT.	18 months

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-2-7 -----NOTE----- For Instrument 1, the initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used. ----- Perform CHANNEL CALIBRATION.	18 months

Radioactive Liquid Effluent Monitoring Instrumentation
16.11-2

Table 16.11-2-1
Radioactive Liquid Effluent Monitoring Instrumentation

	REQUIRED CHANNELS	CONDITIONS	APPLICABILITY	TESTING REQUIREMENTS
1. Radioactivity Monitors Providing Alarm and Automatic Termination of Release				
1.a Waste Liquid Discharge Monitor (EMF-49 – Low Range)	1 per station	<u>A, B, G</u> C	<u>At all times</u> (Note 1)	TR 16.11-2-1 TR 16.11-2-3 TR 16.11-2-6 TR 16.11-2-7
1.b Turbine Building Sump Monitor (EMF-31)	1	<u>A, B, G</u> E	<u>At all times</u> (Note 1)	TR 16.11-2-1 TR 16.11-2-4 TR 16.11-2-6 TR 16.11-2-7
1.c Monitor Tank Building Liquid Discharge Monitor (EMF-57 – Low Range)	1 per station	<u>A, B, G</u> C	<u>At all times</u> (Note 1)	TR 16.11-2-1 TR 16.11-2-3 TR 16.11-2-6 TR 16.11-2-7
2. Continuous Composite Samplers and Sampler Flow Monitor				
2.a Conventional Waste Water Treatment Line (no alarm/trip function)	1 per station	<u>B, G</u> E (Note 2)	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-7
3. Flow Rate Measurement Devices				
3.a Waste Liquid Effluent Line (no alarm/trip function)	1 per station	<u>B, G</u> D	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-7
3.b Conventional Waste Water Treatment Line (no alarm/trip function)	1 per station	<u>B, G</u> D (Note 2)	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-7
3.c Low Pressure Service Water Minimum Flow Interlock	1 per station	<u>B, G</u> D	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-5 TR 16.11-2-7
3.d Monitor Tank Building Waste Liquid Effluent Line (no alarm/trip function)	1 per station	<u>B, G</u> D	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-7
4. Radioactivity Monitors Providing Alarm				
4.a Service Water Monitor on Containment Spray Heat Exchanger (EMF-45 A & B – Low Range)	1 per heat exchanger	<u>A, B, G</u> F	<u>At all times</u> (Note 1)	TR 16.11-2-1 TR 16.11-2-4 TR 16.11-2-6 TR 16.11-2-7

Note 1: At all times, unless effluent pathway is mechanically isolated such that a release to the environment is not possible.

Note 2: Condition D entry and associated Required Action not required if any flow indication remains available. Condition E entry and associated Required Action not required if the composite sampler remains available.

BASES The Radioactive Liquid Effluent Monitoring Instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents 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 FUNCTIONALITY 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.

Regarding Note 1 of Table 16.11-2-1, isolation of the effluent pathway is to be by mechanical means (e.g., valve closure). Electrical or pneumatic isolation is not required, unless the isolation is designed to receive an automatic signal to open.

Note 2 allows for the continued use of any installed discharge flow indication on loop 0WCLP5110. This note also allows for use of the composite sampler if available. In some instances, the transmitter and associated components may be declared nonfunctional but still provide accurate flow indication or continue to take composite samples as required.

- REFERENCES**
1. Catawba Offsite Dose Calculation Manual.
 2. 10 CFR Part 20.
 3. 10 CFR Part 50, Appendix A.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-3 Dose

COMMITMENT 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 Figure 16.11-16-1 in SLC 16.11-16) shall be limited:

- a. During any calendar quarter to ≤ 1.5 mrem to the whole body and to ≤ 5 mrem to any organ, and
- b. During any calendar year to ≤ 3 mrem to the whole body and to ≤ 10 mrem to any organ.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Calculated dose from release of radioactive materials in liquid effluents exceeding above limits.	A.1 -----NOTE----- If drinking water supply is taken from receiving water body within 3 miles downstream of plant discharge, the Special Report shall also include the results of radiological analyses of the drinking water source and the radiological impact on finished drinking water supplies with regard to 40 CFR 141, Safe Drinking Water Act. ----- Prepare and submit a Special Report to the NRC which identifies the causes for exceeding the limits, corrective actions taken to reduce releases, and actions taken to ensure that subsequent releases are within limits.	30 days

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-3-1 Determine cumulative dose contributions from liquid effluents for current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM.	31 days

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

This SLC applies to the release of radioactive materials in liquid effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 40 CFR Part 141.
3. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-4 Liquid Radwaste Treatment System

COMMITMENT The Liquid Radwaste Treatment System shall be FUNCTIONAL 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 Figure 16.11-16-1 in SLC 16.11-16) 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.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Radioactive liquid waste being discharged without treatment and in excess of above limits. <u>AND</u> Any portion of Liquid Radwaste Treatment System not in operation.	A.1 Prepare and submit a Special Report to the NRC which identifies the reasons liquid radwaste was discharged without treatment, identification of non-functional equipment and reasons for non-functionality, corrective actions taken to restore the equipment to FUNCTIONAL status, and actions taken to prevent recurrence.	30 days

TESTING REQUIREMENTS

NOTE

The Liquid Radwaste Treatment System shall be demonstrated FUNCTIONAL by meeting SLC 16.11-1 and SLC 16.11-3.

TEST	FREQUENCY
TR 16.11-4-1 Project liquid release doses from each unit to UNRESTRICTED AREAS, in accordance with the methodology and parameters in the ODCM, when the Liquid Radwaste Treatment System is not being fully utilized.	31 days

BASES

The FUNCTIONALITY 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 COMMITMENT implements the requirements of 10 CFR Part 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 SLC applies to the release of radioactive materials in liquid effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix A.

REFERENCES (continued)

3. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-5 Chemical Treatment Ponds

COMMITMENT The quantity of radioactive material contained in each Chemical Treatment Pond (CTP) shall be limited by the following expression:

$$\frac{264}{V} \cdot \sum_j \frac{A_j}{(C_j \times 10)} < 1.0$$

excluding tritium and dissolved or entrained noble gases,

where:

A_j = CTP inventory limit for single radionuclide "j", in Curies;

C_j = 10 CFR 20, Appendix B, Table 2, Column 2, concentration for single radionuclide "j", microCuries/milliliter;

V = design volume of liquid and slurry in the CTP, in gallons;
and

264 = conversion unit, microCuries/Curie per milliliter/gallon.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
A.	Quantity of radioactive material in any CTP exceeding above limit.	A.1 Suspend all additions of radioactive material to the CTP.	Immediately
		<u>AND</u> A.2 Initiate corrective action to reduce the CTP contents to within limits.	Immediately

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-5-1 Verify that the quantity of radioactive material contained in each batch of resin/water slurry to be transferred to the CTPs is within limits by analyzing a representative sample of the batch to be transferred. Each batch to be transferred to the CTPs shall be limited by: $\sum_j \frac{c_j}{(C_j \times 10)} < 0.006,$ where: c_j = radioactive resin/water slurry concentration for radionuclide "j" entering the UNRESTRICTED AREA CTPs, in microCuries/milliliter; and C_j = 10 CFR 20, Appendix B, Table 2, Column 2, concentration for single radionuclide "j", in microCuries/milliliter.	Prior to each transfer

BASES The inventory limits of the CTPs are based on limiting the consequences of an uncontrolled release of the pond inventory. The expression in this SLC assumes the pond inventory is uniformly mixed, that the pond is located in an uncontrolled area as defined in 10 CFR Part 20, and that the concentration limit in Note 1 to Appendix B of 10 CFR Part 20 applies.

The batch limits of resin/water slurry transferred to the CTP assure that radioactive material transferred to the CTP are "as low as is reasonably achievable" in accordance with 10 CFR 50.36a. The expression in SLC 16.11-5 assures no batch will be transferred to the CTP unless the sum of the ratios of the activity of the radionuclides to their respective concentration limitation is less than the ratio of the 10 CFR Part 50, Appendix I, Section II.A, total body dose level to the instantaneous whole body dose rate limitation, or that:

$$\sum_j \frac{c_j}{(C_j \times 10)} < \frac{3 \text{ mrem / yr}}{500 \text{ mrem / yr}} = 0.006,$$

where:

BASES (continued)

C_j = radioactive resin/water slurry concentration for radionuclide "j" entering the UNRESTRICTED AREA CTP, in microCuries/milliliter; and,

C_j = 10 CFR Part 20, Appendix B, Table 2, Column 2, concentration for single radionuclide "j", in microCuries/milliliter.

The filter/demineralizers using powdered resin and the blowdown demineralizer are backwashed or sluiced to a holding tank. The tank will be agitated to obtain a representative sample of the resin inventory in the tank. A known weight of the wet, drained resin (moisture content approximately 55 to 60%, bulk density of about 58 pounds per cubic foot) will then be counted. The concentration of the resin slurry to be pumped to the CTPs will then be determined by the formula:

$$C_j = \frac{Q_j W_R}{V_T},$$

where:

Q_j = concentration of radioactive materials in wet, drained resin for radionuclide "j", excluding tritium, dissolved or entrained noble gases, and radionuclides with less than an 8-day half-life. The analysis shall include at least Ce-144, Cs-134, Cs-137, Co-58, and Co-60, in microCuries/gram. Estimates of the Sr-89 and Sr-90 batch concentration shall be included based on the most recent monthly composite analysis (within 3 months);

W_R = total weight of resin in the storage tank in grams (determined from chemistry logs procedures); and,

V_T = total volume of resin water mixture in storage tank to be transferred to the CTPs in milliliters.

The batch limits provide assurance that activity input to the CTP will be minimized, and a means of identifying radioactive material in the inventory limitation of this SLC.

REFERENCES	1.	Catawba Offsite Dose Calculation Manual.
	2.	10 CFR Part 20, Appendix B.
	3.	10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-6 Gaseous Effluents

- COMMITMENT** The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Figure 16.11-16-1 in SLC 16.11-16) shall be limited to the following:
- For noble gases: ≤ 500 mrem/yr to the whole body and ≤ 3000 mrem/yr to the skin; and,
 - For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives > 8 days: ≤ 1500 mrem/yr to any organ.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Dose rate not within limit.	A.1 Restore the release rate to within limits.	Immediately

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-6-1 Verify that the dose rate due to noble gases in gaseous effluents is within limits in accordance with the methodology and parameters in the ODCM.	In accordance with the methodology and parameters in the ODCM
TR 16.11-6-2 Verify that the dose rate due to Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives > 8 days in gaseous effluents is within limits in accordance with the methodology and parameters in the ODCM by obtaining representative samples and performing analyses according to Table 16.11-6-1.	According to Table 16.11-6-1

Table 16.11-6-1
Radioactive Gaseous Waste Sampling and Analysis Program (page 1 of 4)

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	Prior to each release Each Tank Grab Sample	Prior to each release Each Tank	Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁴
2. Containment Purge	Prior to each release Each PURGE ⁽³⁾ Grab Sample	Prior to each release Each PURGE ⁽³⁾	Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁴
3. Unit Vent	7 days ⁽³⁾⁽⁴⁾ Grab Sample	31 days 7 days ⁽³⁾	H-3 (oxide) Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁶ 1x10 ⁻⁴
4. Containment Air Release and Addition System	24 hours ⁽³⁾⁽⁵⁾ Grab Sample	24 hours ⁽³⁾⁽⁵⁾	H-3 (oxide) Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁶ 1x10 ⁻⁴
5. All Release Types as Listed in 3. Above	Continuous ⁽⁶⁾	31 days 7 days ⁽⁷⁾ Charcoal Sample	H-3 (oxide) I-131 I-133	1x10 ⁻⁶ 1x10 ⁻¹² 1x10 ⁻¹⁰
	Continuous ⁽⁶⁾	7 days ⁽⁷⁾ Particulate Sample	Principal Gamma Emitters ⁽²⁾	1x10 ⁻¹¹
	Continuous ⁽⁶⁾	31 days Composite Particulate Sample	Gross Alpha ⁽⁸⁾	1x10 ⁻¹¹
	Continuous ⁽⁶⁾	92 days Composite Particulate Sample	Sr-89, Sr-90	1x10 ⁻¹¹
				(continued)

Table 16.11-6-1
Radioactive Gaseous Waste Sampling and Analysis Program (page 2 of 4)

GASEOUS RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) ⁽¹⁾ (μCi/ml)
6. Waste Monitor Tank Building Ventilation Exhaust	7 days Grab Sample	7 days	Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁴
	Continuous ⁽⁶⁾	7 days ⁽⁹⁾ Charcoal Sample	H-3 (oxide)	1x10 ⁻⁸
	Continuous ⁽⁶⁾	7 days ⁽⁹⁾ Particulate Sample	I-131	1x10 ⁻¹²
	Continuous ⁽⁶⁾	7 days ⁽⁹⁾ Particulate Sample	I-133	1x10 ⁻¹⁰
	Continuous ⁽⁶⁾	31 days Composite Particulate Sample	Principal Gamma Emitters ⁽²⁾	1x10 ⁻¹¹
	Continuous ⁽⁶⁾	92 days Composite Particulate Sample	Gross Alpha	1x10 ⁻¹¹
			Sr-89, Sr-90	1x10 ⁻¹¹

Table 16.11-6-1

Radioactive Gaseous Waste Sampling and Analysis Program (page 3 of 4)

NOTES:

- (1) The LLD is defined, for purposes of these commitments, 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:

$$LLD = \frac{(2.71/T) + 4.65 s_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

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

S_b = the standard deviation of the background counting rate or of the counting rate of a blank sample as appropriate (counts per minute);

E = the counting efficiency (counts per disintegration);

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

2.22×10^6 = the number of disintegrations per minute per microCurie;

Y = the fractional radiochemical yield, when applicable;

λ = the radioactive decay constant for the particular radionuclide (sec^{-1});

Δt = the elapsed time between midpoint of sample collection and time of counting (sec); and

T = the sample counting time (min).

Typical values of E, V, Y and Δt shall be used in the calculation.

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

Table 16.11-6-1

Radioactive Gaseous Waste Sampling and Analysis Program (page 4 of 4)

- (2) The principal gamma emitters for which the LLD specification applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 in noble gas releases based on grab samples and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, and Ce-141 in Iodine and particulate releases based on continuous samples. The LLD for Ce-144 is 5×10^{-9} $\mu\text{Ci/ml}$ and is based on continuous samples. 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 Radioactive Effluent Release Report, pursuant to Technical Specification 5.6.3 in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.
- (3) Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER stabilization (power level constant at desired power level) after a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period, for at least one of the three gaseous release types with this notation.
- (4) Tritium grab samples shall be taken at least once per 24 hours when the refueling canal is flooded.
- (5) Required sampling and analysis frequency during effluent release via this pathway.
- (6) The ratio of the sample flow volume to the sampled stream flow volume shall be known for the time period covered by each dose or dose rate calculation made in accordance with SLCs 16.11-6, 16.11-8, and 16.11-9.
- (7) Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing, or after removal from sampler. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup, or THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does not apply if: (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the reactor coolant has not increased more than a factor of 3; and (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.
- (8) The composite filter(s) will be analyzed for alpha activity by analyzing one filter per week to ensure that at least four filters are analyzed per collection period.
- (9) Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours to meet LLDs after changing, or after removal from sampler. If the particulate and charcoal sample frequency is changed to a 24-hour frequency, the corresponding LLDs may be increased by a factor of 10 (e.g., LLD for I-131 from 1×10^{-12} to 1×10^{-11} $\mu\text{Ci/ml}$).

BASES

The basic requirements for SLCs concerning effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent SLCs will keep average annual releases of radioactive material in effluents to small percentages of the limits specified in the old 10 CFR 20.106 (new 10 CFR 20.1301). These requirements further indicate that operational flexibility is allowed, compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which references Appendix B, Table II concentrations (MPCs). These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials in effluents as low as is reasonably achievable (ALARA) as set forth in 10 CFR 50, Appendix I.

As stated in the Introduction to Appendix B of the new 10 CFR 20, the gaseous effluent concentration (EC) limits given in Appendix B, Table 2, Column 1, are based on an annual dose of 50 mrem for isotopes for which inhalation or ingestion is limiting or 100 mrem for isotopes for which submersion (noble gases) is limiting. Since release concentrations corresponding to limiting dose rates less than or equal to 500 mrem/year to the whole body, 3000 mrem/year to the skin from noble gases, and 1500 mrem/year to any organ from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days at the site boundary has been acceptable as a SLC limit for gaseous effluents to assure that the limits of 10 CFR 50, Appendix I and 40 CFR 190 are not likely to be exceeded, it should not be necessary to restrict the operational flexibility by incorporating the dose rate associated with the EC value for isotopes based on inhalation/ingestion (50 mrem/year) or the dose rate associated with the EC value for isotopes based on submersion (100 mrem/year).

Having sufficient operational flexibility is especially important in establishing a basis for effluent monitor setpoint calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, relate to a dose of 50 or 100 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 or 100 mrem/year.

These low values are impractical upon which to base effluent monitor setpoint calculations for many gaseous effluent release situations when monitor background, monitor sensitivity, and monitor performance must be taken into account.

Therefore, to accommodate operational flexibility needed for effluent releases, the limits associated with gaseous release rate SLCs will be maintained at the current instantaneous dose rate limit for noble gases of 500 mrem/year to the whole body and 3000 mrem/year to the skin; and for Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate

BASES (continued)

form with half-lives greater than 8 days, an instantaneous dose rate limit of 1500 mrem/year to any organ.

Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I and 40 CFR 190. Operational history at Catawba has demonstrated that the use of the dose rate values listed above (i.e., 500 mrem/year, 3000 mrem/year, and 1500 mrem/year) as SLC limits has resulted in calculated maximum individual doses to MEMBERS OF THE PUBLIC that are small percentages of the limits of 10 CFR 50, Appendix I and 40 CFR 190.

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 whole body and to less than or equal to 3000 mrem/year to the skin from noble gases, and to less than or equal to 1500 mrem/year to any organ from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days.

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

The required detection capabilities for radioactive material in gaseous waste samples are tabulated in terms of the lower limits of detection (LLDs). Based on NUREG-1301 and Regulatory Guide 1.21, the LLD value of 1×10^{-4} $\mu\text{Ci/ml}$ for grab samples is only applicable to noble gases grab samples and the LLD values for particulate and iodine radionuclides are applicable to continuous charcoal and particulate samples. The Table 16.11-6-1 Gaseous Release Type Number 5 (All Release Types as Listed in 3. Above) and Type Number 6 (Waste Monitor Tank Building Ventilation Exhaust) LLDs are based on weekly samples per NUREG-1301. There are two isotopes with associated LLDs that do not agree directly with NUREG-1301: Ce-144, LLD of 5×10^{-9} $\mu\text{Ci/ml}$, which has historically been applied and achieved for analytical results, and I-133, LLD of 1×10^{-10} $\mu\text{Ci/ml}$, which again has been historically listed, as 1×10^{-9} $\mu\text{Ci/ml}$, for Radioactive Gaseous Waste Sampling but changed to be in agreement with I-131 for weekly (7-day) samples and is not specified in NUREG-1301. Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, HASL-300 (revised annually), Currie, L.A., "Limits for Qualitative Detection and Quantitative Determination – Application to Radiochemistry," Anal. Chem. **40**, 586-93 (1968), and Hartwell, J.K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

- REFERENCES 1. Catawba Offsite Dose Calculation Manual.

REFERENCES (continued)

2. 10 CFR Part 20, Appendix B.
3. 10 CFR Part 20.
4. 10 CFR Part 50.
5. 40 CFR Part 190.
6. NUREG-1301.
7. Regulatory Guide 1.21.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-7 Radioactive Gaseous Effluent Monitoring Instrumentation

COMMITMENT The Radioactive Gaseous Effluent Monitoring Instrumentation channels shown in Table 16.11-7-1 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of SLC 16.11-6 are not exceeded.

AND

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: Conditions B and K are applicable at all times. All other Conditions are applicable as shown in Table 16.11-7-1.

REMEDIAL ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Radioactive Gaseous Effluent Monitoring Instrumentation channel(s) Alarm/Trip Setpoint less conservative than required.	A.1 Suspend the release of radioactive gaseous effluents monitored by the affected channel(s).	Immediately
	<u>OR</u> A.2 Declare the channel(s) non-functional.	Immediately
B. One or more Radioactive Gaseous Effluent Monitoring Instrumentation channel(s) non-functional.	B.1 Enter the applicable Conditions and Required Actions specified in Table 16.11-7-1 for the channel(s).	Immediately
	<u>AND</u> B.2.1 Restore channel to FUNCTIONAL status.	14 Days (*Note 1)
	<u>OR</u> B.2.2 Restore channel to FUNCTIONAL status.	30 Days (*Note 1)

*Note 1 – Required Action B.2.1 applies to Instrument 1.a ONLY. (continued)
Required Action B.2.2 applies to Instruments 1.b, 2, 3.a, 3.c, 3.d, 3.e, 5, 6.a, and 6.b listed in Table 16.11-7-1.

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One channel non-functional.	C.1 Verify that EMF-36 (Low Range) is FUNCTIONAL.	Prior to initiating a release
	<u>OR</u>	
	C.2.1 Analyze two independent samples of the tank's contents.	Prior to initiating a release
	<u>AND</u>	
	C.2.2 Perform independent verification of the discharge line valving.	Prior to initiating a release
	<u>AND</u>	
	C.2.3.1 Perform independent verification of manual portion of the computer input for release rate calculations performed by computer.	Prior to initiating a release
	<u>OR</u>	
	C.2.3.2 Perform independent verification of entire calculations for release rate calculations performed manually.	Prior to initiating a release
	<u>OR</u>	
	C.3 Suspend release of radioactive effluents via this pathway.	Immediately

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One or more flow rate measurement device channel(s) non-functional.	D.1 Estimate the flow rate of the release.	Once per 4 hours during releases
E. One or more Noble Gas Activity Monitor channel(s) non-functional.	-----NOTE----- <u>IF</u> 0EMF41 is NON-FUNCTIONAL <u>AND</u> either 1EMF36 <u>OR</u> 2EMF36 is NON-FUNCTIONAL, perform SLC 16.7-10, Required Action G.2 -----	Once per 12 hours during releases Within 24 hours of obtaining the sample
	E.1 Obtain grab samples from effluent pathway. <u>AND</u> E.2 Perform an analysis of grab samples for radioactivity.	

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Noble Gas Activity Monitor (EMF-39 – Low Range) providing automatic termination of release via the Containment Purge Exhaust System (CPES) non-functional.	F.1 -----NOTE----- In order to utilize Required Action F.1, the following conditions must be satisfied: 1. The affected unit is in MODES 5 or 6. 2. EMF-36 is FUNCTIONAL and in service for the affected unit. 3. The Reactor Coolant System for the affected unit has been vented. 4. Either the reactor vessel head is in place (bolts are not required), or if it is not in place, the lifting of heavy loads over the reactor vessel and the movement of irradiated fuel assemblies within containment have been suspended. ----- Restore the non-functional channel to FUNCTIONAL status.	12 hours
G. Required Action and associated Completion Time of Condition F not met. <u>OR</u> Required Action F.1 not utilized.	G.1 Suspend PURGING of radioactive effluents via this pathway.	Immediately

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
H. One or more sampler channel(s) non-functional.	H.1 Perform sampling with auxiliary sampling equipment as required by Table 16.11-6-1.	Continuously
I. One Condenser Evacuation System Noble Gas Activity Monitor (EMF-33) channel non-functional.	I.1 -----NOTE----- Applicable to effluent releases via the Condenser Steam Air Ejector (ZJ) System. ----- Obtain grab samples from effluent pathway.	Once per 12 hours during releases
	<u>AND</u> I.2 -----NOTE----- Applicable to effluent releases via the Condenser Steam Air Ejector (ZJ) System. ----- Perform an analysis of grab samples for radioactivity. <u>AND</u>	

(continued)

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. (continued)	I.3 -----NOTE----- Applicable to effluent releases via the Steam Generator Blowdown (BB) System atmospheric vent valve (BB-27) in the off-normal mode. ----- Perform an analysis of grab samples for radioactivity at a lower limit of detection of 10^{-7} microCurie/ml.	Once per 12 hours during releases when secondary specific activity is > 0.01 microCurie/gm DOSE EQUIVALENT I-131 <u>AND</u> Once per 24 hours during releases when secondary specific activity is ≤ 0.01 microCurie/gm DOSE EQUIVALENT I-131
J. Noble Gas Activity Monitor (EMF-39 – Low Range) providing automatic termination of release via the Containment Air Release and Addition System non-functional.	J.1 Verify that EMF-36 is FUNCTIONAL. <u>OR</u> J.2.1 Analyze two independent samples of the containment atmosphere. <u>AND</u>	Prior to initiating a release Prior to initiating a release (continued)

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
J. (continued)	J.2.2 Perform independent verification of the discharge line valving. <u>AND</u> J.2.3.1 Perform independent verification of manual portion of the computer input for release rate calculations performed by computer. <u>OR</u> J.2.3.2 Perform independent verification of entire calculations for release rate calculations performed manually.	Prior to initiating a release Prior to initiating a release Prior to initiating a release

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
K. Required Action and associated Completion Time of Condition B or F not met.	K.1 Explain why the non-functionality was not corrected within the specified Completion Time.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

-----NOTE-----
Refer to Table 16.11-7-1 to determine which TRs apply for each Radioactive Gaseous Effluent Monitoring Instrumentation channel.

TEST	FREQUENCY
TR 16.11-7-1 Perform CHANNEL CHECK.	Prior to each release
TR 16.11-7-2 -----NOTE----- For Instruments 1a, 4, and 5, a SOURCE CHECK for these channels shall be the qualitative assessment of channel response when the channel sensor is exposed to a light-emitting diode. ----- Perform SOURCE CHECK.	Prior to each release
TR 16.11-7-3 Perform CHANNEL CHECK.	12 hours
TR 16.11-7-4 Perform CHANNEL CHECK.	24 hours
TR 16.11-7-5 Perform CHANNEL CHECK.	7 days

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-7-6 -----NOTE----- For Instruments 2 and 3a, a SOURCE CHECK for these channels shall be the qualitative assessment of channel response when the channel sensor is exposed to a light-emitting diode. ----- Perform SOURCE CHECK.	31 days
TR 16.11-7-7 -----NOTE----- For Instruments 1a, 3a, 3c, 5, and 6a, the COT shall also demonstrate, as applicable, that automatic isolation of this pathway and control room alarm annunciation (for EMF-58, alarm annunciation is in the Monitor Tank Building control room and on the Monitor Tank Building control panel remote annunciator panel) occur if any of the following conditions exist: a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or b. Circuit failure/instrument downscale failure (alarm only) ----- Perform COT.	18 months
TR 16.11-7-8 -----NOTE----- For Instruments 2 and 4, the COT shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exist: a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or b. Circuit failure/instrument downscale failure (alarm only) ----- Perform COT.	18 months

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-7-9 -----NOTE----- For Instruments 1a, 2, 3a, 3c, 4, 5, and 6a, the initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used. ----- Perform CHANNEL CALIBRATION.	18 months

Table 16.11-7-1

Radioactive Gaseous Effluent Monitoring Instrumentation (page 1 of 2)

INSTRUMENT	REQUIRED CHANNELS	CONDITIONS	APPLICABLE MODES	TESTING REQUIREMENTS
1. Waste Gas Holdup System				
1.a Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-50 – Low Range)	1 per station	<u>B, K</u> A, C	<u>At all times</u> (Note 3)	TR 16.11-7-1 TR 16.11-7-2 TR 16.11-7-7 TR 16.11-7-9
1.b Effluent System Flow Rate Measuring Device	1 per station	<u>B, K</u> D	<u>At all times</u> (Note 3)	TR 16.11-7-1 TR 16.11-7-9
2. Condenser Evacuation System Noble Gas Activity Monitor (EMF-33) (BB-27 is only isolation function required) (Note 1)	1	<u>B, K</u> A, I	<u>At all times</u> (Note 4)	TR 16.11-7-3 TR 16.11-7-6 TR 16.11-7-8 TR 16.11-7-9
3. Vent System				
3.a Noble Gas Activity Monitor (EMF-36 – Low Range)	1	A, B, E, K	At all times	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
3.b Deleted.				
3.c Particulate Sampler (EMF-35)	1	<u>B, K</u> A, H	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
3.d Unit Vent Stack Flow Rate Meter (no alarm/trip function)	1	<u>B, K</u> D	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9
3.e Unit Vent Radiation Monitor Flow Meter	1	<u>B, K</u> E	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9
4. Containment Purge System Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-39 – Low Range)	1	A, F, G, K	5, 6	TR 16.11-7-2 TR 16.11-7-3 TR 16.11-7-8 TR 16.11-7-9

(continued)

Table 16.11-7-1

Radioactive Gaseous Effluent Monitoring Instrumentation (page 2 of 2)

INSTRUMENT	REQUIRED CHANNELS	CONDITIONS	APPLICABLE MODES	TESTING REQUIREMENTS
5. Containment Air Release and Addition System Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-39 – Low Range)	1	<u>B, K</u> A, J	<u>At all times</u> 1, 2, 3, 4, 5, 6	TR 16.11-7-2 TR 16.11-7-3 TR 16.11-7-7 TR 16.11-7-9
6. Monitor Tank Building HVAC				
6.a Noble Gas Activity Monitor – Providing Alarm (EMF-58 – Low Range)	1 per station	<u>B, K</u> A, E	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
6.b Effluent Flow Rate Measuring Device	1 per station	<u>B, K</u> D	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9

Note 1: The setpoint is as required by the primary to secondary leak rate monitoring program.

Note 2: Applicable at all times, unless the effluent pathway is mechanically isolated; thus, a release to the environment is not possible.

Note 3: Applicable at all times, unless the effluent pathway is mechanically isolated; thus, a release to the environment is not possible. Utilization of this note requires the pathway be isolated by locked close valve.

Note 4: When air ejectors are in operation, apply Required Action I.3 when air ejectors are NOT in operation.

BASES

The Radioactive Gaseous Effluent Monitoring Instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The Alarm/Trip Setpoints for these instruments shall be calculated 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. Conservative Alarm/Trip Setpoints may be used during a release provided they are less than or equal to the setpoints determined by the methodology and parameters of the ODCM. The FUNCTIONALITY 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. The sensitivity of any noble gas activity monitor used to show compliance with the gaseous effluent release requirements of SLC 16.11-8 shall be such that concentrations as low as 1×10^{-6} $\mu\text{Ci/cc}$ are measurable.

Regarding Notes 2 and 3 of Table 16.11-7-1, isolation of the effluent pathway is to be by mechanical means (e.g., valve closure). Electrical or pneumatic isolation is not required, unless the isolation is designed to receive an automatic signal to open. For EMF-50 Low Range only, isolation of the effluent pathway is only considered complete if isolated by a locked closed valve.

In MODES 5 and 6, initiation of the Containment Purge Exhaust System (CPES) with EMF-39 non-functional is not permissible. The basis for Required Action F.1 is to allow the continued operation of the CPES with EMF-39 initially FUNCTIONAL. Continued operation of the CPES is contingent upon the ability of the affected unit to meet the requirements as noted in Required Action F.1.

TR 16.11-7-7 requires the performance of a COT on the applicable Radioactive Gaseous Effluent Radiation Monitors. The test ensures that a signal from the control room module can generate the appropriate alarm and actuations. The required actuations/isolations for a High Radiation condition (i.e., radiation level above its Trip 2 setpoint) are listed below for each monitor.

0EMF-50 - Waste Gas Discharge Monitor

1WG160 closes when EMF-50 detects radiation level above its setpoint.

1/2EMF-36 - Unit Vent Noble Gas Monitor

The following actuations occur when EMF-36 detects radiation level above its setpoint:

1. Containment Air Release and Addition System fans discharge to unit vent valve VQ10 closes.
2. Auxiliary Building unfiltered ventilation exhaust fans A and B stop.
3. Fuel Handling Ventilation Exhaust System (FHVES) exhaust trains align to the filter units.
4. (For 1EMF-36 only) 1WG160 closes.

1/2EMF-35 - Unit Vent Particulate Monitor (Sampler)

The following actuations occur when EMF-35 detects radiation level above its setpoint:

1. Containment Air Release and Addition System fans discharge to unit vent valve VQ10 closes.
2. Auxiliary Building unfiltered ventilation exhaust fans A and B stop.

BASES (continued)

3. Fuel Handling Ventilation Exhaust System (FHVES) exhaust trains align to the filter units.
4. ((For 1EMF-35 only) 1WG160 closes.

1/2EMF-39 - Containment Noble Gas Monitor

The following actuations occur when EMF-39 detects radiation level above its setpoint:

1. Signals are provided to both trains of the Solid State Protection System (SSPS) to initiate a CPES isolation. This is verified by observing that Relays K615 in the SSPS A output cabinet and the SSPS B output cabinet are latched.
2. EMF-39 isolates the CPES without going through the SSPS by stopping CPES supply fans A and B, CPES exhaust fans A and B, and by closing the appropriate valves and dampers.
3. Containment Evacuation Alarm, unless the source range trip is blocked.

0EMF-58

This monitor provides no control function.

TR 16.11-7-8 requires the performance of a COT on the Condensate Steam Air Ejector Exhaust Monitor, 1/2EMF-33 and Containment Noble Gas Monitor, 1/2EMF-39. The test ensures that a signal from the control room module can generate the appropriate alarm and actuations. The required actuations/isolations for a High Radiation condition (i.e., radiation level above its Trip 2 setpoint) are listed below.

1/2EMF-33 - Condensate Steam Air Ejector Exhaust Monitor

The following actuations occur when EMF-33 detects radiation level above its setpoint:

1. Closure of BB27 is required in order to isolate the Blowdown Tank from the environment. Because of plant limitations/restrictions:
 - a. Opening the valve (in order to verify it goes closed on a High Radiation signal) is only possible during outages due to the negative effects on the Blowdown System with the unit at power.
 - b. Testing during innages will be by verification of relay contacts opening in the valve circuit.
2. Closure of BB24, BB65, BB69, and BB73 is required to minimize the amount of potentially contaminated material being delivered to the Blowdown Tank.
3. Closure of NM269, NM270, NM271, and NM272 is required to minimize the amount of potentially contaminated material being delivered to the Conventional Sampling System.
4. Closure of NM267 is required to minimize the amount of potentially contaminated material being delivered to the Condensate Storage Tank by isolating flow through EMF-34.
5. Closure of BB48 is required to minimize the amount of potentially contaminated material being delivered from the Blowdown System discharge to the Turbine Building sump.

BASES (continued)

1/2EMF-39 - Containment Noble Gas Monitor

The following actuations occur when EMF-39 detects radiation level above its setpoint:

1. Signals are provided to both trains of the Solid State Protection System (SSPS) to initiate a Containment Air Release and Addition System isolation. This is verified by observing that relays K615 in the SSPS Train A output cabinet and the SSPS Train B output cabinet are latched.
2. Containment Evacuation Alarm, unless the source range trip is blocked.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 20.
3. AR 02400313, 0EMF-50L Non-Functional.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-7 Radioactive Gaseous Effluent Monitoring Instrumentation

COMMITMENT The Radioactive Gaseous Effluent Monitoring Instrumentation channels shown in Table 16.11-7-1 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of SLC 16.11-6 are not exceeded.

AND

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: Conditions are applicable as shown in Table 16.11-7-1. |

REMEDIAL ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Radioactive Gaseous Effluent Monitoring Instrumentation channel(s) Alarm/Trip Setpoint less conservative than required.	A.1 Suspend the release of radioactive gaseous effluents monitored by the affected channel(s).	Immediately
	<u>OR</u> A.2 Declare the channel(s) non-functional.	Immediately
B. One or more Radioactive Gaseous Effluent Monitoring Instrumentation channel(s) non-functional.	B.1 Enter the applicable Conditions and Required Actions specified in Table 16.11-7-1 for the channel(s).	Immediately
	<u>AND</u> B.2.1 Restore channel to FUNCTIONAL status.	14 Days (*Note 1)
	<u>OR</u> B.2.2 Restore channel to FUNCTIONAL status.	30 Days (*Note 1)

*Note 1 – Required Action B.2.1 applies to Instrument 1.a ONLY. (continued)
Required Action B.2.2 applies to Instruments 1.b, 2, 3.a, 3.c, 3.d, 3.e, 5, 6.a, and 6.b listed in Table 16.11-7-1.

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One channel non-functional.	C.1 Verify that EMF-36 (Low Range) is FUNCTIONAL.	Prior to initiating a release
	<u>OR</u>	
	C.2.1 Analyze two independent samples of the tank's contents.	Prior to initiating a release
	<u>AND</u>	
	C.2.2 Perform independent verification of the discharge line valving.	Prior to initiating a release
	<u>AND</u>	
	C.2.3.1 Perform independent verification of manual portion of the computer input for release rate calculations performed by computer.	Prior to initiating a release
	<u>OR</u>	
	C.2.3.2 Perform independent verification of entire calculations for release rate calculations performed manually.	Prior to initiating a release
	<u>OR</u>	
	C.3 Suspend release of radioactive effluents via this pathway.	Immediately

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One or more flow rate measurement device channel(s) non-functional.	D.1 Estimate the flow rate of the release.	Once per 4 hours during releases
E. One or more Noble Gas Activity Monitor channel(s) non-functional.	-----NOTE----- <u>IF</u> 0EMF41 is NON-FUNCTIONAL <u>AND</u> either 1EMF36 <u>OR</u> 2EMF36 is NON-FUNCTIONAL, perform SLC 16.7-10, Required Action G.2 ----- E.1 Obtain grab samples from effluent pathway. <u>AND</u> E.2 Perform an analysis of grab samples for radioactivity.	Once per 12 hours during releases Within 24 hours of obtaining the sample

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Noble Gas Activity Monitor (EMF-39 – Low Range) providing automatic termination of release via the Containment Purge Exhaust System (CPES) non-functional.	F.1 -----NOTE----- In order to utilize Required Action F.1, the following conditions must be satisfied: 1. The affected unit is in MODES 5 or 6. 2. EMF-36 is FUNCTIONAL and in service for the affected unit. 3. The Reactor Coolant System for the affected unit has been vented. 4. Either the reactor vessel head is in place (bolts are not required), or if it is not in place, the lifting of heavy loads over the reactor vessel and the movement of irradiated fuel assemblies within containment have been suspended. ----- Restore the non-functional channel to FUNCTIONAL status.	12 hours
G. Required Action and associated Completion Time of Condition F not met. <u>OR</u> Required Action F.1 not utilized.	G.1 Suspend PURGING of radioactive effluents via this pathway.	Immediately

(continued)

REMEDIAL ACTIONS (continued)

[illegible]

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. (continued)	I.3 -----NOTE----- Applicable to effluent releases via the Steam Generator Blowdown (BB) System atmospheric vent valve (BB-27) in the off-normal mode. ----- Perform an analysis of grab samples for radioactivity at a lower limit of detection of 10^{-7} microCurie/ml.	Once per 12 hours during releases when secondary specific activity is > 0.01 microCurie/gm DOSE EQUIVALENT I-131 <u>AND</u> Once per 24 hours during releases when secondary specific activity is ≤ 0.01 microCurie/gm DOSE EQUIVALENT I-131
J. Noble Gas Activity Monitor (EMF-39 – Low Range) providing automatic termination of release via the Containment Air Release and Addition System non-functional.	J.1 Verify that EMF-36 is FUNCTIONAL. <u>OR</u> J.2.1 Analyze two independent samples of the containment atmosphere. <u>AND</u>	Prior to initiating a release Prior to initiating a release (continued)

REMEDIAL ACTIONS

REMEDIAL ACTIONS		
CONDITION	REQUIRED ACTION	COMPLETION TIME
J. (continued)	J.2.2 Perform independent verification of the discharge line valving. <u>AND</u> J.2.3.1 Perform independent verification of manual portion of the computer input for release rate calculations performed by computer. <u>OR</u> J.2.3.2 Perform independent verification of entire calculations for release rate calculations performed manually.	Prior to initiating a release Prior to initiating a release Prior to initiating a release

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
K. Required Action and associated Completion Time of Condition B or F not met.	K.1 Explain why the non-functionality was not corrected within the specified Completion Time.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

-----NOTE-----
Refer to Table 16.11-7-1 to determine which TRs apply for each Radioactive Gaseous Effluent Monitoring Instrumentation channel.

TEST	FREQUENCY
TR 16.11-7-1 Perform CHANNEL CHECK.	Prior to each release
TR 16.11-7-2 -----NOTE----- For Instruments 1a, 4, and 5, a SOURCE CHECK for these channels shall be the qualitative assessment of channel response when the channel sensor is exposed to a light-emitting diode. ----- Perform SOURCE CHECK.	Prior to each release
TR 16.11-7-3 Perform CHANNEL CHECK.	12 hours
TR 16.11-7-4 Perform CHANNEL CHECK.	24 hours
TR 16.11-7-5 Perform CHANNEL CHECK.	7 days

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-7-6 -----NOTE----- For Instruments 2 and 3a, a SOURCE CHECK for these channels shall be the qualitative assessment of channel response when the channel sensor is exposed to a light-emitting diode. ----- Perform SOURCE CHECK.	31 days
TR 16.11-7-7 -----NOTE----- For Instruments 1a, 3a, 3c, 5, and 6a, the COT shall also demonstrate, as applicable, that automatic isolation of this pathway and control room alarm annunciation (for EMF-58, alarm annunciation is in the Monitor Tank Building control room and on the Monitor Tank Building control panel remote annunciator panel) occur if any of the following conditions exist: a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or b. Circuit failure/instrument downscale failure (alarm only) ----- Perform COT.	18 months
TR 16.11-7-8 -----NOTE----- For Instruments 2 and 4, the COT shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exist: a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or b. Circuit failure/instrument downscale failure (alarm only) ----- Perform COT.	18 months

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-7-9 -----NOTE----- For Instruments 1a, 2, 3a, 3c, 4, 5, and 6a, the initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used. ----- Perform CHANNEL CALIBRATION.	18 months

Table 16.11-7-1

Radioactive Gaseous Effluent Monitoring Instrumentation (page 1 of 2)

INSTRUMENT	REQUIRED CHANNELS	CONDITIONS	APPLICABLE MODES	TESTING REQUIREMENTS
1. Waste Gas Holdup System				
1.a Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-50 – Low Range)	1 per station	<u>B, K</u> A, C	<u>At all times</u> (Note 3)	TR 16.11-7-1 TR 16.11-7-2 TR 16.11-7-7 TR 16.11-7-9
1.b Effluent System Flow Rate Measuring Device	1 per station	<u>B, K</u> D	<u>At all times</u> (Note 3)	TR 16.11-7-1 TR 16.11-7-9
2. Condenser Evacuation System Noble Gas Activity Monitor (EMF-33) (BB-27 is only isolation function required) (Note 1)	1	<u>B, K</u> A, I	<u>At all times</u> (Note 4)	TR 16.11-7-3 TR 16.11-7-6 TR 16.11-7-8 TR 16.11-7-9
3. Vent System				
3.a Noble Gas Activity Monitor (EMF-36 – Low Range)	1	A, B, E, K	At all times	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
3.b Deleted.				
3.c Particulate Sampler (EMF-35)	1	<u>B, K</u> A, H	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
3.d Unit Vent Stack Flow Rate Meter (no alarm/trip function)	1	<u>B, K</u> D	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9
3.e Unit Vent Radiation Monitor Flow Meter	1	<u>B, K</u> E	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9
4. Containment Purge System Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-39 – Low Range)	1	A, F, G, K	5, 6	TR 16.11-7-2 TR 16.11-7-3 TR 16.11-7-8 TR 16.11-7-9

(continued)

Table 16.11-7-1

Radioactive Gaseous Effluent Monitoring Instrumentation (page 2 of 2)

INSTRUMENT	REQUIRED CHANNELS	CONDITIONS	APPLICABLE MODES	TESTING REQUIREMENTS
5. Containment Air Release and Addition System Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-39 – Low Range)	1	A, B, J, K	1, 2, 3, 4, 5, 6	TR 16.11-7-2 TR 16.11-7-3 TR 16.11-7-7 TR 16.11-7-9
6. Monitor Tank Building HVAC				
6.a Noble Gas Activity Monitor – Providing Alarm (EMF-58 – Low Range)	1 per station	<u>B, K</u> A, E	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
6.b Effluent Flow Rate Measuring Device	1 per station	<u>B, K</u> D	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9

Note 1: The setpoint is as required by the primary to secondary leak rate monitoring program.

Note 2: Applicable at all times, unless the effluent pathway is mechanically isolated; thus, a release to the environment is not possible.

Note 3: Applicable at all times, unless the effluent pathway is mechanically isolated; thus, a release to the environment is not possible. Utilization of this note requires the pathway be isolated by locked close valve.

Note 4: When air ejectors are in operation, apply Required Action I.3 when air ejectors are NOT in operation.

BASES

The Radioactive Gaseous Effluent Monitoring Instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The Alarm/Trip Setpoints for these instruments shall be calculated 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. Conservative Alarm/Trip Setpoints may be used during a release provided they are less than or equal to the setpoints determined by the methodology and parameters of the ODCM. The FUNCTIONALITY 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. The sensitivity of any noble gas activity monitor used to show compliance with the gaseous effluent release requirements of SLC 16.11-8 shall be such that concentrations as low as 1×10^{-6} $\mu\text{Ci/cc}$ are measurable.

Regarding Notes 2 and 3 of Table 16.11-7-1, isolation of the effluent pathway is to be by mechanical means (e.g., valve closure). Electrical or pneumatic isolation is not required, unless the isolation is designed to receive an automatic signal to open. For EMF-50 Low Range only, isolation of the effluent pathway is only considered complete if isolated by a locked closed valve.

In MODES 5 and 6, initiation of the Containment Purge Exhaust System (CPES) with EMF-39 non-functional is not permissible. The basis for Required Action F.1 is to allow the continued operation of the CPES with EMF-39 initially FUNCTIONAL. Continued operation of the CPES is contingent upon the ability of the affected unit to meet the requirements as noted in Required Action F.1.

TR 16.11-7-7 requires the performance of a COT on the applicable Radioactive Gaseous Effluent Radiation Monitors. The test ensures that a signal from the control room module can generate the appropriate alarm and actuations. The required actuations/isolations for a High Radiation condition (i.e., radiation level above its Trip 2 setpoint) are listed below for each monitor.

0EMF-50 - Waste Gas Discharge Monitor

1WG160 closes when EMF-50 detects radiation level above its setpoint.

1/2EMF-36 - Unit Vent Noble Gas Monitor

The following actuations occur when EMF-36 detects radiation level above its setpoint:

1. Containment Air Release and Addition System fans discharge to unit vent valve VQ10 closes.
2. Auxiliary Building unfiltered ventilation exhaust fans A and B stop.
3. Fuel Handling Ventilation Exhaust System (FHVES) exhaust trains align to the filter units.
4. (For 1EMF-36 only) 1WG160 closes.

1/2EMF-35 - Unit Vent Particulate Monitor (Sampler)

The following actuations occur when EMF-35 detects radiation level above its setpoint:

1. Containment Air Release and Addition System fans discharge to unit vent valve VQ10 closes.
2. Auxiliary Building unfiltered ventilation exhaust fans A and B stop.

BASES (continued)

3. Fuel Handling Ventilation Exhaust System (FHVES) exhaust trains align to the filter units.
4. ((For 1EMF-35 only) 1WG160 closes.

1/2EMF-39 - Containment Noble Gas Monitor

The following actuations occur when EMF-39 detects radiation level above its setpoint:

1. Signals are provided to both trains of the Solid State Protection System (SSPS) to initiate a CPES isolation. This is verified by observing that Relays K615 in the SSPS A output cabinet and the SSPS B output cabinet are latched.
2. EMF-39 isolates the CPES without going through the SSPS by stopping CPES supply fans A and B, CPES exhaust fans A and B, and by closing the appropriate valves and dampers.
3. Containment Evacuation Alarm, unless the source range trip is blocked.

0EMF-58

This monitor provides no control function.

TR 16.11-7-8 requires the performance of a COT on the Condensate Steam Air Ejector Exhaust Monitor, 1/2EMF-33 and Containment Noble Gas Monitor, 1/2EMF-39. The test ensures that a signal from the control room module can generate the appropriate alarm and actuations. The required actuations/isolations for a High Radiation condition (i.e., radiation level above its Trip 2 setpoint) are listed below.

1/2EMF-33 - Condensate Steam Air Ejector Exhaust Monitor

The following actuations occur when EMF-33 detects radiation level above its setpoint:

1. Closure of BB27 is required in order to isolate the Blowdown Tank from the environment. Because of plant limitations/restrictions:
 - a. Opening the valve (in order to verify it goes closed on a High Radiation signal) is only possible during outages due to the negative effects on the Blowdown System with the unit at power.
 - b. Testing during innages will be by verification of relay contacts opening in the valve circuit.
2. Closure of BB24, BB65, BB69, and BB73 is required to minimize the amount of potentially contaminated material being delivered to the Blowdown Tank.
3. Closure of NM269, NM270, NM271, and NM272 is required to minimize the amount of potentially contaminated material being delivered to the Conventional Sampling System.
4. Closure of NM267 is required to minimize the amount of potentially contaminated material being delivered to the Condensate Storage Tank by isolating flow through EMF-34.
5. Closure of BB48 is required to minimize the amount of potentially contaminated material being delivered from the Blowdown System discharge to the Turbine Building sump.

BASES (continued)

1/2EMF-39 - Containment Noble Gas Monitor

The following actuations occur when EMF-39 detects radiation level above its setpoint:

1. Signals are provided to both trains of the Solid State Protection System (SSPS) to initiate a Containment Air Release and Addition System isolation. This is verified by observing that relays K615 in the SSPS Train A output cabinet and the SSPS Train B output cabinet are latched.
2. Containment Evacuation Alarm, unless the source range trip is blocked.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 20.
3. AR 02400313, 0EMF-50L Non-Functional.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-8 Dose - Noble Gases

COMMITMENT The air dose due to noble gases released in gaseous effluents, from each unit, to areas at and beyond the SITE BOUNDARY (see Figure 16.11-16-1 in SLC 16.11-16) shall be limited to the following:

- a. During any calendar quarter: ≤ 5 mrad for gamma radiation and ≤ 10 mrad for beta radiation, and
- b. During any calendar year: ≤ 10 mrad for gamma radiation and ≤ 20 mrad for beta radiation.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Calculated air dose from radioactive noble gases in gaseous effluents exceeding any of above limits.	A.1 Prepare and submit a Special Report to the NRC which identifies the causes for exceeding the limits, corrective actions taken to reduce releases, and actions taken to ensure that subsequent releases are within limits.	30 days

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-8-1 Determine cumulative dose contributions from noble gases in gaseous effluents for current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM.	31 days

BASES

This SLC is provided to implement the requirements of Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The COMMITMENT implements the guides set forth in Section II.B of Appendix I. The REMEDIAL ACTION statement provides 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 TESTING 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 commitment applies to the release of radioactive materials in gaseous effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-9 Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form

COMMITMENT The dose to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives > 8 days in gaseous effluents released, from each unit, to areas at and beyond the SITE BOUNDARY (see Figure 16.11-16-1 in SLC 16.11-16) shall be limited to the following:

- a. During any calendar quarter: ≤ 7.5 mrem to any organ, and
- b. During any calendar year: ≤ 15 mrem to any organ.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Calculated dose from the release of Iodine-131, Iodine-133, tritium, and radioactive material in particulate form with half-lives > 8 days in gaseous effluents exceeding any of above limits.	A.1 Prepare and submit a Special Report to the NRC which identifies the causes for exceeding the limits, corrective actions taken to reduce releases, and actions taken to ensure that subsequent releases are within limits.	30 days

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-9-1 Determine cumulative dose contributions from Iodine-131, Iodine-133, tritium, and radioactive material in particulate form with half-lives > 8 days in gaseous effluents for current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM.	31 days

BASES This SLC is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50, and are the guides set forth in Section II.C of Appendix I. The REMEDIAL ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive materials in gaseous effluents to UNRESTRICTED AREAS will be kept “as low as is reasonably achievable”. The ODCM calculational methods specified in the TESTING REQUIREMENTS implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, “Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I,” Revision 1, October 1977 and Regulatory Guide 1.111, “Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases 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 COMMITMENTS 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 commitment applies to the release of radioactive materials in gaseous effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

- REFERENCES**
1. Catawba Offsite Dose Calculation Manual.
 2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-10 Gaseous Radwaste Treatment System

COMMITMENT The VENTILATION EXHAUST TREATMENT SYSTEM and the WASTE GAS HOLDUP SYSTEM shall be FUNCTIONAL and appropriate portions of these systems 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 Figure 16.11-16-1 in SLC 16.11-16) would exceed either:

- 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 of a MEMBER OF THE PUBLIC.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Radioactive gaseous waste being discharged without treatment and in excess of above limits.	A.1 Prepare and submit a Special Report to the NRC which identifies non-functional equipment and reasons for non-functionality, actions taken to restore the equipment to FUNCTIONAL status, and actions taken to prevent recurrence.	30 days

TESTING REQUIREMENTS

-----NOTE-----

The installed VENTILATION EXHAUST TREATMENT SYSTEM and WASTE GAS HOLDUP SYSTEM shall be demonstrated FUNCTIONAL by meeting SLC 16.11-6, SLC 16.11-8, and SLC 16.11-9.

TEST	FREQUENCY
TR 16.11-10-1 Project gaseous release doses from each unit to areas at and beyond the SITE BOUNDARY, in accordance with the methodology and parameters in the ODCM, when Gaseous Radwaste Treatment Systems are not being fully utilized.	31 days

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

This SLC applies to the release of radioactive materials in gaseous effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-11 Solid Radioactive Wastes

COMMITMENT	Radioactive wastes shall be processed and packaged to ensure compliance with the applicable requirements of 10 CFR Part 20, 10 CFR Part 61, 10 CFR Part 71, and state regulations governing the transportation and disposal of radioactive wastes. The Solid Radwaste System or an approved alternative process shall be used in accordance with the PROCESS CONTROL PROGRAM for the solidification of liquid or wet radioactive wastes or the dewatering of wet radioactive wastes to be shipped for direct disposal at a 10 CFR Part 61 licensed disposal site. Wastes shipped for offsite processing in accordance with the processor's specifications and transportation requirements are not required to be solidified or dewatered to meet disposal requirements.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Applicable regulatory requirements for solidified or dewatered wastes not satisfied.	A.1 Suspend shipment of inadequately processed waste.	Immediately
	<u>AND</u> A.2 Take action to correct the PROCESS CONTROL PROGRAM, procedures, or solid waste equipment as necessary to prevent recurrence.	Prior to next shipment for disposal of solidified or dewatered wastes

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Solidification test as described in the PROCESS CONTROL PROGRAM fails to verify solidification.	B.1 Suspend solidification of the batch under test and follow PROCESS CONTROL PROGRAM guidance for test failures.	Immediately
	<u>AND</u> B.2 -----NOTE----- Once a subsequent test verifies solidification, solidification of the batch may be resumed as directed by the PROCESS CONTROL PROGRAM. ----- Modify the PROCESS CONTROL PROGRAM as required to assure solidification of subsequent batches of waste.	Prior to next solidification for shipment of waste for disposal at a 10 CFR Part 61 disposal site
C. Solidification or dewatering for disposal not performed in accordance with the PROCESS CONTROL PROGRAM.	C.1 Reprocess the waste in accordance with PROCESS CONTROL PROGRAM requirements.	Prior to shipment for disposal of the inadequately processed waste that requires solidification or dewatering
	<u>OR</u> C.2 Follow PROCESS CONTROL PROGRAM or procedure guidance for alternative free-standing liquid verification to ensure the waste in each container meets disposal requirements and take appropriate administrative action to prevent recurrence.	Prior to shipment for disposal of the inadequately processed waste that requires solidification or dewatering

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Solid waste equipment incapable of supporting COMMITMENT.	D.1 Restore the equipment to a status capable of supporting COMMITMENT.	In a time frame supporting COMMITMENT
	<u>OR</u> D.2 Provide for alternative capability to process wastes as necessary to satisfy all applicable transportation and disposal requirements.	In a time frame supporting COMMITMENT

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-11-1 Verify, using the PROCESS CONTROL PROGRAM, the solidification of at least one representative test specimen from at least every tenth batch of each type of radioactive waste to be solidified for disposal at a 10 CFR Part 61 disposal site.	Every tenth batch of each type of radioactive waste to be solidified

BASES This SLC implements the requirements of 10 CFR Part 50.36a and General Design Criterion 60 of Appendix A to 10 CFR Part 50 and requirements to use a PROCESS CONTROL PROGRAM to meet applicable 10 CFR Part 61 waste form criteria for solidified and dewatered radioactive wastes.

- The PROCESS CONTROL PROGRAM describes administrative and operational controls used for the solidification of liquid or wet solid radioactive wastes in order to meet applicable 10 CFR Part 61 waste form requirements.
- The PROCESS CONTROL PROGRAM describes the administrative and operational controls used for the dewatering of wet radioactive wastes to meet 10 CFR Part 61 free-standing water requirements.
- The process parameters used in establishing the PROCESS CONTROL PROGRAM shall be based on demonstrated processing of actual or simulated liquid or wet solid wastes and must adequately verify that the final product of solidification or dewatering meets all applicable federal, state, and disposal site requirements.

REFERENCES

1. 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."
2. 10 CFR Part 50, Appendix A.
3. 10 CFR Part 20, "Standards for Protection Against Radiation."
4. 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste."
5. 10 CFR Part 71, "Packaging and Transportation of Radioactive Materials."
6. PROCESS CONTROL PROGRAM Manual.
7. Generic Letter 84-12, "Compliance with 10 CFR Part 61 and Implementation of the Radiological Effluent Technical Specifications (RETS) and Attendant Process Control Program (PCP)."
8. Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program."

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-12 Total Dose

COMMITMENT 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 ≤ 25 mrem to the whole body or any organ, except the thyroid, which shall be limited to ≤ 75 mrem.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Calculated doses from releases exceeding twice the specified limits of SLC 16.11-3, SLC 16.11-8, or SLC 16.11-9.	A.1 Verify, by calculation, that the cumulative dose from direct radiation contributions and outside storage tanks and radioactivity releases are within the total dose limit.	Immediately
	<u>AND</u> A.2 -----NOTE----- Only required to be performed if the total dose limit is exceeded. ----- Prepare and submit a Special Report to the NRC which identifies corrective actions to be taken to reduce subsequent releases to prevent recurrence and schedule for achieving conformance with specified limits.	30 days

TESTING REQUIREMENTS

NOTE

Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with SLC 16.11-3, SLC 16.11-8, and SLC 16.11-9, and in accordance with the methodology and parameters specified in the ODCM.

TEST	FREQUENCY
TR 16.11-12-1 Determine cumulative dose contributions from direct radiation from the units and from radwaste storage tanks in accordance with the methodology and parameters specified in the ODCM.	When calculated doses from effluent releases exceed twice the limits of SLC 16.11-3, SLC 16.11-8, or SLC 16.11-9

BASES

This SLC is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR Part 20 by 46 FR 18525. The SLC 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 and from outside storage tanks are kept small.

This Special Report, as defined in 10 CFR 20.2203(a)(4), shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered.

BASES (continued)

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 10 CFR 20.2203(a)(4), is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 and a variance is granted 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 SLC 16.11-1 and SLC 16.11-6.

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.

- REFERENCES
1. Catawba Offsite Dose Calculation Manual.
 2. 10 CFR Part 20.
 3. 40 CFR Part 190.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-13 Monitoring Program

COMMITMENT The Radiological Environmental Monitoring Program shall be conducted as specified in Table 16.11-13-1.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Radiological Environmental Monitoring Program not being conducted as specified in Table 16.11-13-1.	A.1 Identify the reasons for not conducting the program as required and the plans for preventing a recurrence in the Annual Radiological Environmental Operating Report.	In the next scheduled Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2
B. Radioactivity level resulting from plant effluents of environmental sampling medium at a specified location in excess of reporting limits of Table 16.11-13-2 when averaged over any calendar quarter.	B.1 Prepare and submit a Special Report that identifies the cause(s) for exceeding the limits and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to a MEMBER OF THE PUBLIC is less than the calendar year limits of SLC 16.11-3, SLC 16.11-8, and SLC 16.11-9.	30 days

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Milk or fresh leafy vegetation samples unavailable from one or more sample location(s) required by Table 16.11-13-1.	C.1 -----NOTE----- Specific location(s) from which samples were unavailable may be deleted from the program. ----- Revise the Radiological Environmental Monitoring Program to identify location(s) for obtaining replacement samples. <u>AND</u> C.2 Identify the cause of the unavailability of samples and identify and justify new location(s) for obtaining replacement samples in the Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).	30 days In the next scheduled Annual Radioactive Effluent Release Report pursuant to Technical Specification 5.5.1

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-13-1-----NOTE----- The maximum values for the lower limits of detection shall be as specified in Table 16.11-13-3. ----- Collect and analyze radiological environmental monitoring samples pursuant to Table 16.11-13-1 from the specific locations given in the table and figure(s) in the ODCM.	In accordance with Table 16.11-13-1

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 1 of 7)

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

(continued)

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 2 of 7)

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
2. Airborne Radioiodine and Particulates	Samples from five locations. Three samples from close to the three SITE BOUNDARY locations, in different sectors, of the highest calculated annual average ground-level D/Q; One sample from the vicinity of a community having the highest calculated annual average ground-level D/Q; and One sample from a control location, as for example 15 to 30 km distant and in the least prevalent wind direction.	Continuous sampler operation with sample collection weekly, or more frequently if required by dust loading.	<u>Radioiodine Canister:</u> I-131 analysis weekly. <u>Particulate Sampler:</u> Gross beta radioactivity analysis following filter change; ⁽³⁾ and gamma isotopic analysis ⁽⁴⁾ of composite (by location) quarterly.

(continued)

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 3 of 7)

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
3. Waterborne			
a. Surface ⁽⁶⁾	One sample upstream. One sample downstream.	Composite sample over 1-month period ⁽⁶⁾ .	Gamma isotopic analysis ⁽⁴⁾ monthly. Composite for tritium analysis quarterly.
b. Ground	Samples from one or two sources only if likely to be affected ⁽⁷⁾ .	Quarterly	Gamma isotopic ⁽⁴⁾ and tritium analysis quarterly.
c. Drinking	One sample of each of one to three of the nearest water supplies that could be affected by its discharge. One sample from a control location.	Composite sample over 2-week period ⁽⁶⁾ when I-131 analysis is performed; monthly composite otherwise.	I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year ⁽⁸⁾ . Composite for gross beta and gamma isotopic analyses ⁽⁴⁾ monthly. Composite for tritium analysis quarterly.
d. Sediment from Shoreline	One sample from downstream area with existing or potential recreational value.	Semiannually	Gamma isotopic analysis ⁽⁴⁾ semiannually.

(continued)

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 4 of 7)

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
4. Ingestion			
a. Milk	Samples from milking animals in three locations within 5-km distance having the highest dose potential. If there are none, then one sample from milking animals in each of three areas between 5 to 8 km distant where doses are calculated to be greater than 1 mrem per year ⁽⁸⁾ . One sample from milking animals at a control location 15 to 30 km distant and in the least prevalent wind direction.	Semimonthly when animals are on pasture; monthly at other times.	Gamma isotopic ⁽⁴⁾ and I-131 analysis semi-monthly when animals are on pasture; monthly at other times.
b. Fish and Invertebrates	One sample each of a predatory species, a bottom feeder and a forage species in vicinity of plant discharge area. One sample each of a predatory species, a bottom feeder and a forage species in areas not influenced by plant discharge.	Sample in season, or semiannually if they are not seasonal.	Gamma isotopic analysis ⁽⁴⁾ on edible portions.
(continued)			

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 5 of 7)

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
4. Ingestion (Continued)			
c. Food Products	One sample of each principal class of food products from any area that is irrigated by water in which liquid plant wastes have been discharged. Samples of three different kinds of broad leaf vegetation grown nearest each of two different offsite locations of highest predicted annual average ground level D/Q if milk sampling is not performed. One sample of each of the similar broad leaf vegetation grown 15 to 30 km distant in the least prevalent wind direction if milk sampling is not performed.	At time of harvest⁽⁹⁾. Monthly, when available. Monthly, when available.	Gamma isotopic analyses⁽⁴⁾ on edible portion. Gamma isotopic⁽⁴⁾ and I-131 analysis. Gamma isotopic⁽⁴⁾ and I-131 analysis.

Table 16.11-13-1

Radiological Environmental Monitoring Program (page 6 of 7)

NOTES:

- (1) Specific parameters of distance and direction sector from the centerline of the station, and additional description where pertinent, shall be provided for each and every sample location in Table 16.11-13-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978, and to Radiological Assessment Branch Technical Position, Revision 1, November 1979. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to circumstances such as hazardous conditions, seasonal unavailability, and malfunction of automatic sampling equipment. If specimens are unobtainable due to sampling equipment malfunction, effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the Radiological Environmental Monitoring Program. In lieu of any Licensee Event Report required by 10 CFR 50.73 and pursuant to Technical Specification 5.6.3, identify the cause of the unavailability of samples for that pathway and identify the new location(s) for obtaining replacement samples in the next Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).
- (2) One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. (The 40 stations is not an absolute number. The number of direct radiation monitoring stations may be reduced according to geographical limitations; e.g., at an ocean site, some sectors will be over water so that the number of dosimeters may be reduced accordingly. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used and should be selected to obtain optimum dose information within minimal fading.)
- (3) Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than 10 times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.

Table 16.11-13-1

Radiological Environmental Monitoring Program (page 7 of 7)

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

Table 16.11-13-2

Reporting Levels for Radioactivity Concentrations in Environmental Samples

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	20,000 ⁽¹⁾				
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	

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

Table 16.11-13-3
Lower Limit of Detection (LLD)⁽³⁾ (page 1 of 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	2000 ⁽⁵⁾					
Mn-54	15		130			
Fe-59	30		260			
Co-58, 60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
I-131	1 ⁽⁴⁾	0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15			15		

Table 16.11-13-3

Lower Limit of Detection (LLD)⁽³⁾ (page 2 of 3)

NOTES:

- (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 Technical Specification 5.6.2.
- (2) Required detection capabilities for thermoluminescent dosimeters used for environmental measurements shall be in accordance with the recommendations of Regulatory Guide 4.13.
- (3) The LLD is defined, for purposes of these commitments, as the smallest concentrations 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:

$$LLD = \frac{(2.71/T) + 4.65 s_b}{E \cdot V \cdot 2.22 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD = the "a priori" lower limit of detection (picoCuries 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 picoCurie;

Y = the fractional radiochemical yield, when applicable;

λ = the radioactive decay constant for the particular radionuclide (sec^{-1});

Δt = the elapsed time between environmental collection, or end of the sample collection period, and time of counting (sec); and

T = the sample counting time (min).

Table 16.11-13-3

Lower Limit of Detection (LLD)⁽³⁾ (page 3 of 3)

Typical values of E, V, Y and Δt shall 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 Technical Specification 5.6.2.

- (4) LLD for drinking water samples. If no drinking water pathway exists, the LLD of gamma isotopic analysis may be used.
- (5) If no drinking water pathway exists, a value of 3000 pCi/l may be used.

BASES

The Radiological Environmental Monitoring Program required by this SLC provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the 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. The initially specified Monitoring Program will be effective for at least the first 3 years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 16.11-13-3 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

With the level of radioactivity in an environmental sampling medium at a specified location exceeding the reporting levels of Table 16.11-13-2 when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days a Special Report that defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to a MEMBER OF THE PUBLIC is less than the calendar year limits of SLC 16.11-3, SLC 16.11-8, and SLC 16.11-9. When more than one of the radionuclides in Table 16.11-13-2 are detected in the sampling medium, this report shall be submitted if:

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

When radionuclides other than those in Table 16.11-13-2 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 SLC 16.11-3, SLC 16.11-8, and SLC 16.11-9. 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 Technical Specification 5.6.2. The methodology and parameters used to estimate the potential annual dose to a MEMBER OF THE PUBLIC shall be indicated in the 30-day Special Report.

BASES (continued)

Detailed discussion of the LLD, and other detection limits, can be found in HASL Procedures Manual, HASL-300 (revised annually), Currie, L.A., "Limits for Qualitative Detection and Quantitative Determination – Application to Radiochemistry," Anal. Chem. 40, 586-93 (1968), and Hartwell, J.K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix I.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Identify the new location(s), revised figure(s) and table(s) for the ODCM, and information supporting the change in sampling location(s) in the Annual Radioactive Effluent Release Report.	In the next scheduled Annual Radioactive Effluent Release Report pursuant to Technical Specification 5.5.1

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-14-1-----NOTE----- The results of the Land Use Census shall be included in the Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2. ----- Conduct a Land Use Census during the growing season using the information which will provide the best results such as a door-to-door survey, aerial survey, or consultation with local agricultural authorities.	12 months

BASES

This SLC is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the Radiological Environmental Monitoring Program given in the ODCM are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey, or from consulting with local agricultural authorities shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 m² 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 quantify (26 kg/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: (1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and (2) a vegetation yield of 2 kg/m².

BASES (continued)

With a Land Use Census identifying a location(s) which yield 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 SLC 16.11-13, 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, 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.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-15 Interlaboratory Comparison Program

COMMITMENT Analyses shall be performed on all radioactive materials, supplied as part of an Interlaboratory Comparison Program, that correspond to samples required by SLC 16.11-13.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Analyses not being performed as required.	A.1 Report corrective actions taken to prevent recurrence in the Annual Radiological Environmental Operating Report.	In the next scheduled Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-15-1 Report a summary of the results of the Interlaboratory Comparison Program in the Annual Radiological Environmental Operating Report.	In the Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2

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

BASES (continued)

The Interlaboratory Comparison Program shall be described in the Annual Radiological Environmental Operating Report.

REFERENCES 1. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-16 Annual Radiological Environmental Operating Report and Radioactive Effluent Release Report

COMMITMENT Annual Radiological Environmental Operating Report

Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 15 of each year.

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

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 reports shall also include the following: a summary description of the Radiological Environmental Monitoring Program; at least two legible maps (one map shall cover stations near the SITE BOUNDARY, and a second map shall include the more distant stations) covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by SLC 16.11-15; discussion of all deviations from the sampling schedule of Table 16.11-13-1; and discussion of all analyses in which the LLD required by Table 16.11-13-3 was not achievable.

A single submittal may be made for the station.

(continued)

COMMITMENT (continued)

Radioactive Effluent Release Report

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

The Radioactive Effluent Release Report shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. (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.) 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 five-year average of representative onsite meteorological data shall be used in the gaseous effluent dose pathway calculations. Dispersion factors (X/Qs) and deposition factors (D/Qs) shall be generated using the computer code XOQDOQ (NUREG/CR-2919) which implements NRC Regulatory Guide 1.111. The meteorological conditions concurrent with the time of release shall be reviewed annually to determine if the five-year average values should be revised. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM.

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

The Radioactive Effluent Release Reports shall include the following information for each type of solid waste shipped offsite during the report period:

(continued)

COMMITMENT (continued)

- a. Total container volume, in cubic meters,
- b. Total Curie quantity (determined by measurement or estimate),
- c. Principal radionuclides (determined by measurement or estimate),
- d. Type of waste (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. Number of shipments, and
- f. Solidification agent or absorbent (e.g., cement or other approved agents (media)).

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.

The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the ODCM, as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the Land Use Census pursuant to SLC 16.11-14.

A single submittal may be made for the station. The submittal should combine those sections that are common to both units.

APPLICABILITY: At all times.

REMEDIAL ACTIONS None

TESTING REQUIREMENTS None

BASES None

REFERENCES None

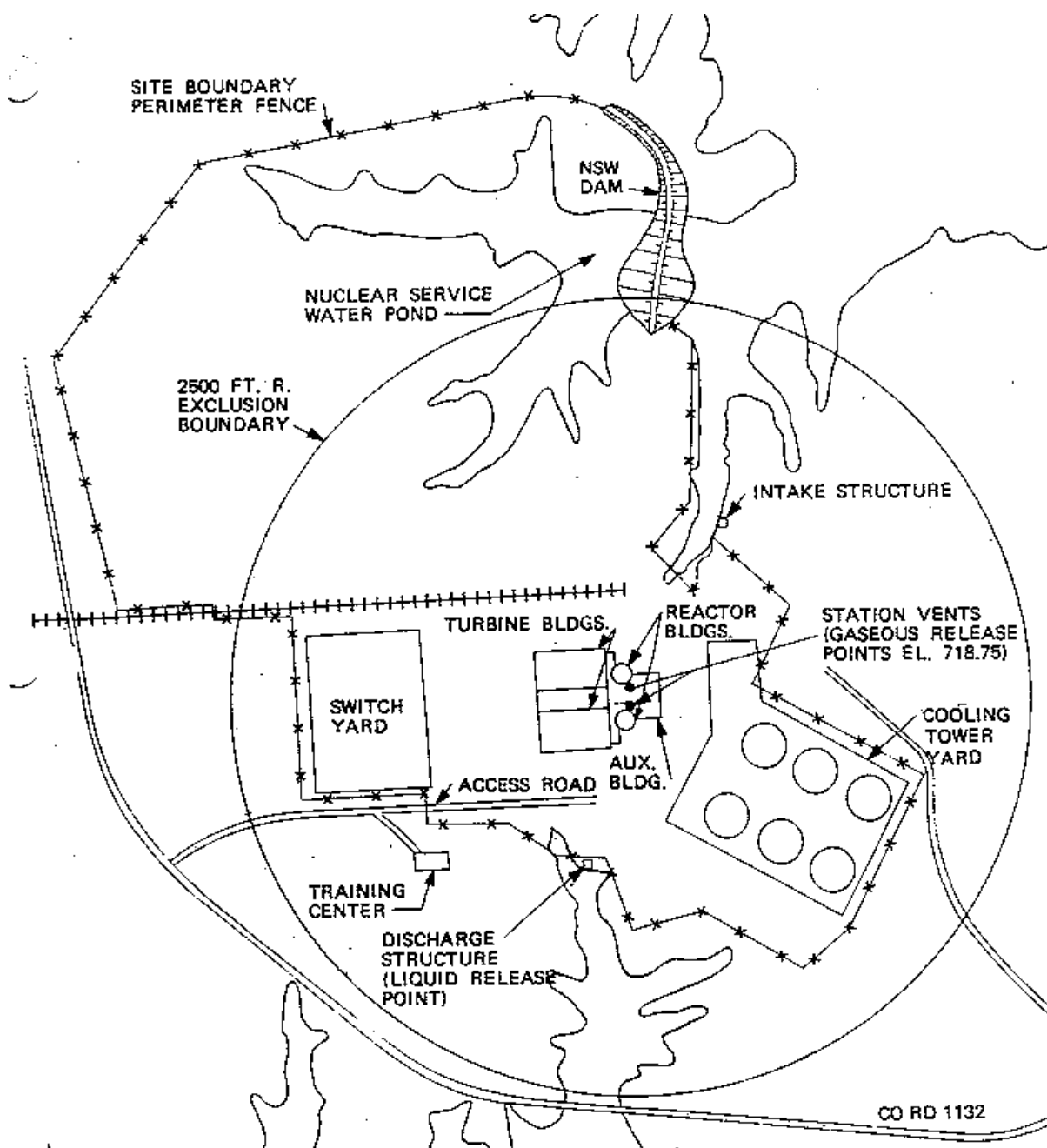


Figure 16.11-16-1

UNRESTRICTED AREA and SITE BOUNDARY for Radioactive Effluents

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-17 Liquid Holdup Tanks

COMMITMENT The quantity of radioactive material contained in each temporary unprotected outdoor tank shall be limited to ≤ 10 Curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Quantity of radioactive material in tank(s) exceeding limit.	A.1 Suspend all additions of radioactive material to the tank(s).	Immediately
	<u>AND</u>	
	A.2 Reduce tank(s) contents to within limit.	48 hours
	<u>AND</u>	
	A.3 Describe the events leading to this condition in the Radioactive Effluent Release Report.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-17-1 Verify that the quantity of radioactive material contained in each tank is within limits by analyzing a representative sample of the tank(s) contents when radioactive materials are being added to the tank(s).	7 days

BASES The tanks included in this SLC are all those outdoor radwaste tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting concentrations would be less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

- REFERENCES**
1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.
 2. Technical Specification 5.5.12, Explosive Gas and Storage Tank Radioactivity Monitoring Program.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-18 Explosive Gas Mixture

COMMITMENT The concentration of oxygen in the WASTE GAS HOLDUP SYSTEM shall be limited to $\leq 2\%$ by volume whenever the hydrogen concentration is $> 4\%$ by volume.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Concentration of oxygen in the WASTE GAS HOLDUP SYSTEM $> 2\%$ but $\leq 4\%$ by volume and hydrogen concentration $> 4\%$ by volume.	A.1 Reduce oxygen concentration to within limits.	48 hours
B. Concentration of oxygen in the WASTE GAS HOLDUP SYSTEM $> 4\%$ by volume and hydrogen concentration $> 4\%$ by volume.	B.1 Suspend all additions of waste gases to the system.	Immediately
	<u>AND</u>	
	B.2 Reduce the concentration of oxygen to $\leq 4\%$ by volume.	Immediately
	<u>AND</u>	
	B.3 Reduce oxygen concentration to within limits.	48 hours

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-18-1 Verify that the concentrations of hydrogen and oxygen in the WASTE GAS HOLDUP SYSTEM are within limits by continuously monitoring the waste gases in the WASTE GAS HOLDUP SYSTEM with the hydrogen and oxygen monitors required FUNCTIONAL by SLC 16.11-20.	During WASTE GAS HOLDUP SYSTEM operation

BASES This SLC is provided to ensure that the concentration of potentially explosive gas mixtures contained in the WASTE GAS HOLDUP SYSTEM is maintained below the flammability limits of hydrogen and oxygen. Automatic control features are included in the system to prevent the hydrogen and oxygen concentrations from reaching these flammability limits. These automatic control features include isolation of the source of hydrogen and/or oxygen, automatic diversion to recombiners, or injection of dilutants to reduce the concentration below the flammability limits. Maintaining the concentration of hydrogen and oxygen below their flammability limits provides assurance that the releases of radioactive materials will be controlled in conformance with the requirements of General Design Criterion 60 of Appendix A to 10 CFR Part 50.

- REFERENCES**
1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.
 2. Technical Specification 5.5.12, Explosive Gas and Storage Tank Radioactivity Monitoring Program.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-19 Gas Storage Tanks

COMMITMENT The quantity of radioactivity contained in each gas storage tank shall be limited to $\leq 97,000$ Curies of noble gases (considered as Xe-133 equivalent).

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Quantity of radioactive material in tank(s) exceeding limit.	A.1 Suspend all additions of radioactive material to the tank(s).	Immediately
	<u>AND</u>	
	A.2 Reduce tank(s) contents to within limit.	48 hours
	<u>AND</u>	
	A.3 Describe the events leading to this condition in the Radioactive Effluent Release Report.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-19-1 Verify that the quantity of radioactive material contained in each tank is within limits when radioactive materials are being added to the tank(s).	24 hours

BASES The tanks included in this SLC are those tanks for which the quantity of radioactivity contained is not limited directly or indirectly by another SLC. Restricting the quantity of radioactivity contained in each gas storage tank provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting whole body exposure to a MEMBER OF THE PUBLIC at the nearest SITE BOUNDARY will not exceed 0.5 rem. This is consistent with Standard Review Plan 11.3, Branch Technical Position ETSB 11-5, "Postulated Radioactive Releases Due to a Waste Gas System Leak or Failure," in NUREG-0800, July 1981.

- REFERENCES**
1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.
 2. Technical Specification 5.5.12, Explosive Gas and Storage Tank Radioactivity Monitoring Program.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-20 Explosive Gas Monitoring Instrumentation

COMMITMENT The Explosive Gas Monitoring Instrumentation channels shown in Table 16.11-20-1 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of SLC 16.11-18 are not exceeded.

APPLICABILITY: During WASTE GAS HOLDUP SYSTEM operation.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Explosive Gas Monitoring Instrumentation channel(s) Alarm/Trip Setpoint less conservative than required.	A.1 Declare the channel(s) non-functional.	Immediately
B. One required hydrogen monitor channel non-functional.	B.1 Suspend oxygen supply to the recombiner.	Immediately
	<u>AND</u> B.2 Restore channel to FUNCTIONAL status.	30 days
C. One required oxygen monitor channel non-functional.	C.1 Obtain and analyze grab samples.	24 hours
	<u>AND</u> C.2 Restore channel to FUNCTIONAL status.	30 days

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two required oxygen monitor channels non-functional.	D.1 Obtain and analyze grab samples.	Once per 4 hours during degassing operations <u>AND</u> Once per 24 hours during other operations
	<u>AND</u> D.2 Restore channels to FUNCTIONAL status.	30 days
E. Required Action and associated Completion Time of Condition B, C, or D not met.	E.1 Prepare and submit a Special Report to the NRC to explain why the non-functionality was not corrected within the time specified.	30 days

TESTING REQUIREMENTS

-----NOTE-----
Refer to Table 16.11-20-1 to determine which TRs apply for each Explosive Gas Monitoring Instrumentation channel.

TEST	FREQUENCY
TR 16.11-20-1 Perform CHANNEL CHECK.	24 hours
TR 16.11-20-2 Perform COT.	31 days

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-20-3-----NOTE----- The CHANNEL CALIBRATION shall include the use of standard gas samples in accordance with the manufacturer's recommendations. In addition, a standard gas sample of nominal four volume percent hydrogen (for the hydrogen monitors), nominal four volume percent oxygen (for the oxygen monitors 0WGMT6540, 0WGMT6560, 0WGMT6160, and 0WGMT6161), and nominal three volume percent oxygen (for the oxygen monitors 0WGMT6550 and 0WGMT6570) with the balance nitrogen, shall be used in the calibration and/or to check linearity of the analyzers. ----- Perform CHANNEL CALIBRATION.	92 days

Table 16.11-20-1

Explosive Gas Monitoring Instrumentation

INSTRUMENT		REQUIRED CHANNELS	TESTING REQUIREMENTS
WASTE GAS HOLDUP SYSTEM Explosive Gas Monitoring Instrumentation			
1.	Hydrogen Monitors	1/in-service train per station	TR 16.11-20-1 TR 16.11-20-2 TR 16.11-20-3
2.	Oxygen Monitors	2/in-service train per station	TR 16.11-20-1 TR 16.11-20-2 TR 16.11-20-3

BASES The Explosive Gas Monitoring Instrumentation is provided for monitoring and controlling the concentrations of potentially explosive gas mixtures in the WASTE GAS HOLDUP SYSTEM.

If an instrument has alarm and trip capability, then both the alarm and the trip setpoints are required to be verified for the instrument to remain FUNCTIONAL. For instruments with alarm-only capability, the alarm setpoint must be verified for the instrument to remain FUNCTIONAL.

OWGMT6540, OWGMT6550, OWGMT6560, and OWGMT6570 provide both an alarm and a trip function. OWGMT6160 and OWGMT6161 provide an alarm-only function. The oxygen monitors for waste gas analyzers OWGMT6550 or OWGMT6570 can only be credited if oxygen concentration is <3.7% and if NO oxygen sources are present.

REFERENCES 1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-21 Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems

- COMMITMENT Licensee-initiated major changes to the Radwaste Treatment Systems (liquid, gaseous, and solid):
1. Shall be reported to the NRC in the Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the Station Manager. Licensees may choose to submit the information called for in this SLC as part of the periodic Updated Final Safety Analysis Report update. The discussion of each change 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 exposures to a MEMBER OF THE PUBLIC 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 prior to when the changes are to be made;
 - g. An estimate of the exposure to plant operating personnel as a result of the change; and

(continued)

COMMITMENT (continued)

- h. Documentation of the fact that the change was reviewed and found acceptable by the Station Manager or the Chemistry Manager.
2. Shall become effective upon review and acceptance by a qualified individual/organization.

APPLICABILITY: At all times.

REMEDIAL ACTIONS None

TESTING REQUIREMENTS None

BASES None

REFERENCES 1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.

Attachment 10
Summary of Changes to the Process Control Program

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 10

Summary of Changes to the Process Control Program

This attachment includes a summary of changes to the PCP.

Attachment 10
Summary of Changes to the Process Control Program

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

No revision of the Catawba Nuclear Station PCP was published in 2024.

Attachment 11
Summary of Major Modifications to the Radioactive Waste Treatment Systems

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 11

Summary of Major Modifications to the Radioactive Waste Treatment Systems

This attachment includes a description of major modifications to the radioactive waste treatment systems that are anticipated to affect effluent releases.

Attachment 11
Summary of Major Modifications to the Radioactive Waste Treatment Systems

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

No major modifications to the Catawba Nuclear Station liquid, solid, or mobile radioactive waste treatment systems that are anticipated to affect effluent releases occurred in 2024.

Attachment 12
Errata to a Previous Year's ARERR

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

ATTACHMENT 12

Errata to a Previous Year's ARERR

This attachment includes any amended pages from a previous year's ARERR.

Attachment 12

Errata to a Previous Year's ARERR

Catawba Nuclear Station Units 1 & 2 **Period 1/1/2024 - 12/31/2024**

There were (2) amendments to a previous year's ARERR.

The following contains amended pages to the Catawba Nuclear Station 2021 and 2023 ARERRs. The Amended pages are identified with "Amendment #" on page. Specific changes are identified with change bars in the right margin.

Catawba Nuclear Station 2021 ARERR Amendment #1 requires the following changes to the Page 2 of Attachment 7 (reference NCR 02515692). Specifically, the page requires a correction of the date in which Well LMW-3A was resampled.

Current Sentence: The well was resampled 01/10/2022 and all nuclides were below Minimum Detectable Activity (MDA).

Corrected Sentence: The well was resampled 01/20/2022 and all nuclides were below Minimum Detectable Activity (MDA).

Catawba Nuclear Station 2023 ARERR Amendment #1 requires the following change to the Page 2 of Attachment 9 (reference NCR 02550484). Specifically, the page should mention the inclusion of the entire UFSAR Section 16.11 Radiological Effluent Controls, as it is required by step 5.2.14.a of AD-CP-ALL-0023.

Current Sentence: As per TS 5.5.5.b, "Licensee initiated changes to the Radiological Effluent Controls of the UFSAR," Catawba is attaching the List of Effective Sections (LOES) which demonstrate no revisions were made in 2023.

Corrected Sentence: As per TS 5.5.5.b, "Licensee initiated changes to the Radiological Effluent Controls of the UFSAR," Catawba is attaching the entire Section 16.11 of the UFSAR and the List of Effective Sections (LOES) which demonstrate no revisions were made in 2023.

A full copy of the 2023 version of Section 16.11 of the UFSAR will also be attached as part of this amendment.

Attachment 12

Errata to a Previous Year's ARERR

Catawba Nuclear Station Units 1 & 2

Period 1/1/2024 - 12/31/2024

Catawba Nuclear Station 2021 ARERR Attachment 7, page 2 as submitted:

Duke Energy implemented a Ground Water Protection program in 2007. This initiative was developed to ensure timely and effective management of situations involving inadvertent releases of licensed material to ground water. As part of this program, Catawba Nuclear Station monitored 49 wells and 1 outfall from the Conventional Wastewater Treatment Ponds in 2021.

Wells are typically sampled quarterly or semi-annually. Ground water samples are regularly analyzed for tritium and gamma emitters, with select wells being analyzed for difficult-to-detect radionuclides. Results from sampling during 2021 confirmed existing knowledge of tritium concentrations in site ground water.

One well sample identified a non-naturally occurring gamma emitter during 2021. Well LMW-3A (CNS Landfill) was collected 12/20/2021 and submitted to General Engineering Laboratories (GEL) in Charleston, South Carolina for analysis. The sample analysis identified 12.8 ± 1.52 pCi/L (2-sigma error) Cs-137. A reanalysis of the sample was performed on 01/10/2022 with Cs-137 activity of 12.5 ± 2.46 pCi/L. The well was resampled 01/10/2022 and all nuclides were below Minimum Detectable Activity (MDA). Sampling changed to monthly instead of quarterly. Sample collected on 03/01/2022 was also less than MDA for all gamma emitters.

Tritium results from sampling during 2021 are shown in the table below.

No events meeting the criteria for voluntary notification per NEI 07-07, Industry Ground Water Protection Initiative, occurred at Catawba Nuclear Station in 2021.

Key to below table.

NS	-	Not scheduled to be sampled, not sampled due to insufficient volume in well, or well inaccessible during outage.
pCi/l	-	picocuries per liter.
< MDA	-	less than minimum detectable activity, typically 250 pCi/l.
20,000 pCi/l	-	the Environmental Protection Agency drinking water standard for tritium. This standard applies only to water used for drinking.
1,000,000 pCi/l	-	the 10 CFR Part 20, Appendix B, Table 2, Column 2, Effluent Concentration Limit for tritium.

Attachment 12 Errata to a Previous Year's ARERR

Catawba Nuclear Station Units 1 & 2 Period 1/1/2024 - 12/31/2024

Catawba Nuclear Station 2021 ARERR Attachment 7, Page 2 as amended (Amendment #1):

Duke Energy implemented a Ground Water Protection program in 2007. This initiative was developed to ensure timely and effective management of situations involving inadvertent releases of licensed material to ground water. As part of this program, Catawba Nuclear Station monitored 49 wells and 1 outfall from the Conventional Wastewater Treatment Ponds in 2021.

Wells are typically sampled quarterly or semi-annually. Ground water samples are regularly analyzed for tritium and gamma emitters, with select wells being analyzed for difficult-to-detect radionuclides. Results from sampling during 2021 confirmed existing knowledge of tritium concentrations in site ground water.

One well sample identified a non-naturally occurring gamma emitter during 2021. Well LMW-3A (CNS Landfill) was collected 12/20/2021 and submitted to General Engineering Laboratories (GEL) in Charleston, South Carolina for analysis. The sample analysis identified 12.8 ± 1.52 pCi/L (2-sigma error) Cs-137. A reanalysis of the sample was performed on 01/10/2022 with Cs-137 activity of 12.5 ± 2.46 pCi/L. The well was resampled 01/20/2022 and all nuclides were below Minimum Detectable Activity (MDA). Sampling changed to monthly instead of quarterly. Sample collected on 03/01/2022 was also less than MDA for all gamma emitters.

Tritium results from sampling during 2022 are shown in the table below.

No events meeting the criteria for voluntary notification per NEI 07-07, Industry Ground Water Protection Initiative, occurred at Catawba Nuclear Station in 2021.

Key to below table.

NS	-	Not scheduled to be sampled, not sampled due to insufficient volume in well, or well inaccessible during outage.
pCi/l	-	picocuries per liter.
< MDA	-	less than minimum detectable activity, typically 250 pCi/l.
20,000 pCi/l	-	the Environmental Protection Agency drinking water standard for tritium. This standard applies only to water used for drinking.
1,000,000 pCi/l	-	the 10 CFR Part 20, Appendix B, Table 2, Column 2, Effluent Concentration Limit for tritium.

Attachment 12
Errata to a Previous Year's ARERR

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Catawba Nuclear Station 2023 ARERR Attachment 9, page 2 as submitted:

ODCM Revision 64

ODCM Revision 64 was approved by the Radiation Protection Manager on 12/30/2020. No revisions to the ODCM were approved during 2023.

Radiological Effluent Controls (SLC 16.11)

The Catawba Nuclear Station Radiological Effluent Controls are contained in SLC 16.11 shown in this section.

There were no revisions to the Catawba Nuclear Station Updated Final Safety Analysis Report, Section 16.11, Radiological Controls, in 2023.

As per TS 5.5.5.b, "Licensee initiated changes to the Radiological Effluent Controls of the UFSAR," Catawba is attaching the List of Effective Sections (LOES) which demonstrate no revisions were made in 2023. Revisions 117 - 118 of the LOES are included as they indicate no changes to Section 16.11 were approved in 2023.

Attachment 12
Errata to a Previous Year's ARERR

Catawba Nuclear Station Units 1 & 2
Period 1/1/2024 - 12/31/2024

Catawba Nuclear Station 2023 ARERR Attachment 7, Page 2 as written (Amendment #1):

ODCM Revision 64

ODCM Revision 64 was approved by the Radiation Protection Manager on 12/30/2020. No revisions to the ODCM were approved during 2023.

Radiological Effluent Controls (SLC 16.11)

The Catawba Nuclear Station Radiological Effluent Controls are contained in SLC 16.11 shown in this section.

There were no revisions to the Catawba Nuclear Station Updated Final Safety Analysis Report, Section 16.11, Radiological Controls, in 2023.

As per TS 5.5.5.b, "Licensee initiated changes to the Radiological Effluent Controls of the UFSAR," Catawba is attaching the entire Section 16.11 of the UFSAR and the List of Effective Sections (LOES) which demonstrate no revisions were made in 2023. Revisions 117 - 118 of the LOES are included as they indicate no changes to Section 16.11 were approved in 2023.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-1 Liquid Effluents

COMMITMENT: The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see Figure 16.11-16-1 in SLC 16.11-16) shall be limited to:

- a. For radionuclides other than dissolved or entrained noble gases, 10 times the effluent concentrations specified in 10 CFR Part 20, Appendix B, Table 2, Column 2, and
- b. For dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} microCurie/ml total activity.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS not within limits.	A.1 Restore the concentration to within limits.	Immediately

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-1-1 -----NOTE----- 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. ----- Sample and analyze radioactive liquid wastes according to Table 16.11-1-1.	According to Table 16.11-1-1

Table 16.11-1-1

Radioactive Liquid Waste Sampling and Analysis Program (page 1 of 3)

LIQUID RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) ⁽¹⁾ ($\mu\text{Ci/ml}$)
1. Batch Waste Release Tanks ⁽²⁾ Any tank which discharges liquid wastes by either liquid effluent monitor, EMF- 49 or EMF-57	Prior to each release Each Batch	Prior to each release Each Batch	Principal Gamma Emitters ⁽³⁾	5×10^{-7}
			I-131	1×10^{-6}
	Prior to each release One Batch/31 days	31 days	Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
	Prior to each release Each Batch	31 days Composite ⁽⁴⁾	H-3	1×10^{-5}
			Gross Alpha	1×10^{-7}
2. Continuous Releases ⁽⁵⁾ Conventional Waste Water Treatment Line	Continuous ⁽⁶⁾	7 days Composite ⁽⁶⁾	Principal Gamma Emitters ⁽³⁾	5×10^{-7}
			I-131	1×10^{-6}
	31 days Grab Sample	31 days	Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
	Continuous ⁽⁶⁾	31 days Composite ⁽⁶⁾	H-3	1×10^{-5}
			Gross Alpha	1×10^{-7}
	Continuous ⁽⁶⁾	92 days Composite ⁽⁶⁾	Sr-89, Sr-90	5×10^{-8}

Table 16.11-1-1

Radioactive Liquid Waste Sampling and Analysis Program (page 2 of 3)

NOTES:

- (1) The LLD is defined, for purposes of these commitments, 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:

$$LLD = \frac{(2.71/T) + 4.65 s_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

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

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

E = the counting efficiency (counts per disintegration),

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

2.22×10^6 = the number of disintegrations per minute per microCurie,

Y = the fractional radiochemical yield, when applicable,

λ = the radioactive decay constant for the particular radionuclide (sec^{-1}),

Δt = the elapsed time between midpoint of sample collection and time of counting (sec), and

T = the sample counting time (min).

Typical values of E, V, Y and Δt shall be used in the calculation.

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

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

Table 16.11-1-1

Radioactive Liquid Waste Sampling and Analysis Program (page 3 of 3)

- (3) The principal gamma emitters for which the LLD specification applies include the following radionuclides:
- Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, and Ce-141. The LLD for Ce-144 is 5×10^{-6} $\mu\text{Ci/ml}$. 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 Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3 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 non-discrete volume, e.g., from a volume of a system that has an input flow during the continuous release.
- (6) To be representative of the quantities and concentrations of radioactive materials in liquid effluents, samples shall be collected continuously in proportion to the rate of flow of the effluent stream. Prior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.

BASES

The basic requirements for SLCs concerning effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent SLCs will keep average annual releases of radioactive material in effluents to small percentages of the limits specified in the old 10 CFR 20.106 (new 10 CFR 20.1302). These requirements further indicate that operational flexibility is allowed, compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which references Appendix B, Table II concentrations (MPCs). These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials in effluents as low as is reasonably achievable (ALARA) as set forth in 10 CFR 50, Appendix I.

As stated in the Introduction to Appendix B of the new 10 CFR 20, the liquid effluent concentration (EC) limits given in Appendix B, Table 2, Column 2, are based on an annual dose of 50 mrem. Since a release concentration corresponding to a limiting dose rate of 500 mrem/year has been acceptable as a SLC limit for liquid effluents, which applies at all times as an assurance that the limits of 10 CFR 50, Appendix I are not likely to be exceeded, it should not be necessary to reduce this limit by a factor of 10.

Operational history at Catawba has demonstrated that the use of the concentration values associated with the old 10 CFR 20.106 as SLC limits has resulted in calculated maximum individual doses to a MEMBER OF THE PUBLIC that are small percentages of the limits of 10 CFR 50, Appendix I. Therefore, the use of concentration values which correspond to an annual dose of 500 mrem (ten times the concentration values stated in the new 10 CFR 20, Appendix B, Table 2, Column 2) should not have a negative impact on the ability to continue to operate within the limits of 10 CFR 50, Appendix I and 40 CFR 190.

Having sufficient operational flexibility is especially important in establishing a basis for effluent monitor setpoint calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, relate to a dose of 50 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 mrem/year. This low value is impractical upon which to base effluent monitor setpoint calculations for many liquid effluent release situations when monitor background, monitor sensitivity, and monitor performance must be taken into account.

Therefore, to accommodate operational flexibility needed for effluent releases, the limits associated with SLC 16.11-1 are based on ten times the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 2, to apply at all times. The multiplier of ten is proposed because the annual dose of 500 mrem, upon which the concentrations in the old 10 CFR 20, Appendix B, Table II, Column 2, are based, is a factor of 10 higher than annual dose of 50 mrem, upon which the concentrations in the new 10 CFR

BASES (continued)

20, Appendix B, Table 2, Column 2, are based. Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I and 40 CFR 190. The concentration limit for dissolved or entrained noble gases is based upon the assumption that Xe-135 is the controlling radioisotope and its MPC 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 commitment 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 HASL Procedures Manual, HASL-300 (revised annually), Currie, L. A., "Limits for Qualitative Detection and Quantitative Determination – Application to Radiochemistry," Annal. Chem. 40, 586-93 (1968), and Hartwell, J. K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 20, Appendix B.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-2 Radioactive Liquid Effluent Monitoring Instrumentation

COMMITMENT The Radioactive Liquid Effluent Monitoring Instrumentation channels shown in Table 16.11-2-1 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of SLC 16.11-1 are not exceeded.

AND

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: Condition Applicability is as shown in Table 16.11-2-1.

REMEDIAL ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

Radioactive Liquid Effluent Monitoring Instrumentation
16.11-2

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Radioactive Liquid Effluent Monitoring Instrumentation channel(s) Alarm/Trip Setpoint less conservative than required.	A.1 Suspend the release of radioactive liquid effluents monitored by the affected channel(s).	Immediately
	<u>OR</u> A.2 Declare the channel(s) non-functional.	Immediately
B. One or more Radioactive Liquid Effluent Monitoring Instrumentation channel(s) non-functional.	B.1 Enter the applicable Conditions and Required Actions specified in Table 16.11-2-1 for the channel(s).	Immediately
	<u>AND</u> B.2.1 Restore channel to FUNCTIONAL status.	14 Days (*Note 1)
	<u>OR</u> B.2.2 Restore channel to FUNCTIONAL status.	30 Days (*Note 1)

*Note 1 – Required Action B.2.1 Applies to Instruments 1.a and 1.c ONLY. (continued)
Required Action B.2.2 Applies to the remainder of required Instruments listed in Table 16.11-2-1.

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One channel non-functional.	C.1.1 Analyze two independent samples per Testing Requirement 16.11-1-1. <u>AND</u>	Prior to initiating a release
	C.1.2 Perform independent verification of the discharge line valving. <u>AND</u>	Prior to initiating a release
	C.1.3.1 Perform independent verification of manual portion of the computer input for release rate calculations performed by computer. <u>OR</u>	Prior to initiating a release
	C.1.3.2 Perform independent verification of entire calculations for release rate calculations performed manually. <u>OR</u>	Prior to initiating a release
	C.2 Suspend release of radioactive effluents via this pathway.	Immediately

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One flow rate measurement device channel non-functional.	D.1 -----NOTE----- Pump performance curves generated in place may be used to estimate flow. ----- Estimate the flow rate of the release.	Once per 4 hours during releases
E. One channel non-functional.	E.1 Perform an analysis of grab samples for radioactivity at a lower limit of detection of 10^{-7} microCurie/ml.	Once per 12 hours during releases when secondary specific activity is > 0.01 microCurie/gm DOSE EQUIVALENT I-131 <u>AND</u> Once per 24 hours during releases when secondary specific activity is ≤ 0.01 microCurie/gm DOSE EQUIVALENT I-131

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. One channel non-functional.	F.1 Collect and analyze grab samples for principal gamma emitters (listed in Table 16.11-1-1, NOTE 3) at a lower limit of detection of no more than 5×10^{-7} microCurie/ml.	Once per 12 hours
G. Required Action and associated Completion Time of Condition B not met.	G.1 Explain why the non-functionality was not corrected within the specified Completion Time.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

-----NOTE-----

Refer to Table 16.11-2-1 to determine which TRs apply for each Radioactive Liquid Effluent Monitoring Instrumentation channel.

TEST	FREQUENCY
TR 16.11-2-1 Perform CHANNEL CHECK.	24 hours
TR 16.11-2-2 -----NOTE----- The CHANNEL CHECK shall consist of verifying indication of flow. ----- Perform CHANNEL CHECK.	24 hours during periods of release
TR 16.11-2-3 Perform SOURCE CHECK.	Prior to each release
TR 16.11-2-4 Perform SOURCE CHECK.	31 days
TR 16.11-2-5 Perform COT.	182 days
TR 16.11-2-6 -----NOTE----- For Instrument 1, the COT shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation (for EMF-57, alarm annunciation is in the Monitor Tank Building control room and on the Monitor Tank Building control panel remote annunciator panel) occur if any of the following conditions exist: a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or b. Circuit failure/instrument downscale failure (alarm only) ----- Perform COT.	18 months

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-2-7 -----NOTE----- For Instrument 1, the initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used. ----- Perform CHANNEL CALIBRATION.	18 months

Radioactive Liquid Effluent Monitoring Instrumentation
16.11-2

Table 16.11-2-1
Radioactive Liquid Effluent Monitoring Instrumentation

	REQUIRED CHANNELS	CONDITIONS	APPLICABILITY	TESTING REQUIREMENTS
1. Radioactivity Monitors Providing Alarm and Automatic Termination of Release				
1.a Waste Liquid Discharge Monitor (EMF-49 – Low Range)	1 per station	<u>A, B, G</u> C	<u>At all times</u> (Note 1)	TR 16.11-2-1 TR 16.11-2-3 TR 16.11-2-6 TR 16.11-2-7
1.b Turbine Building Sump Monitor (EMF-31)	1	<u>A, B, G</u> E	<u>At all times</u> (Note 1)	TR 16.11-2-1 TR 16.11-2-4 TR 16.11-2-6 TR 16.11-2-7
1.c Monitor Tank Building Liquid Discharge Monitor (EMF-57 – Low Range)	1 per station	<u>A, B, G</u> C	<u>At all times</u> (Note 1)	TR 16.11-2-1 TR 16.11-2-3 TR 16.11-2-6 TR 16.11-2-7
2. Continuous Composite Samplers and Sampler Flow Monitor				
2.a Conventional Waste Water Treatment Line (no alarm/trip function)	1 per station	<u>B, G</u> E (Note 2)	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-7
3. Flow Rate Measurement Devices				
3.a Waste Liquid Effluent Line (no alarm/trip function)	1 per station	<u>B, G</u> D	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-7
3.b Conventional Waste Water Treatment Line (no alarm/trip function)	1 per station	<u>B, G</u> D (Note 2)	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-7
3.c Low Pressure Service Water Minimum Flow Interlock	1 per station	<u>B, G</u> D	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-5 TR 16.11-2-7
3.d Monitor Tank Building Waste Liquid Effluent Line (no alarm/trip function)	1 per station	<u>B, G</u> D	<u>At all times</u> (Note 1)	TR 16.11-2-2 TR 16.11-2-7
4. Radioactivity Monitors Providing Alarm				
4.a Service Water Monitor on Containment Spray Heat Exchanger (EMF-45 A & B – Low Range)	1 per heat exchanger	<u>A, B, G</u> F	<u>At all times</u> (Note 1)	TR 16.11-2-1 TR 16.11-2-4 TR 16.11-2-6 TR 16.11-2-7

Note 1: At all times, unless effluent pathway is mechanically isolated such that a release to the environment is not possible.

Note 2: Condition D entry and associated Required Action not required if any flow indication remains available. Condition E entry and associated Required Action not required if the composite sampler remains available.

BASES The Radioactive Liquid Effluent Monitoring Instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents 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 FUNCTIONALITY 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.

Regarding Note 1 of Table 16.11-2-1, isolation of the effluent pathway is to be by mechanical means (e.g., valve closure). Electrical or pneumatic isolation is not required, unless the isolation is designed to receive an automatic signal to open.

Note 2 allows for the continued use of any installed discharge flow indication on loop 0WCLP5110. This note also allows for use of the composite sampler if available. In some instances, the transmitter and associated components may be declared nonfunctional but still provide accurate flow indication or continue to take composite samples as required.

- REFERENCES**
1. Catawba Offsite Dose Calculation Manual.
 2. 10 CFR Part 20.
 3. 10 CFR Part 50, Appendix A.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-3 Dose

COMMITMENT 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 Figure 16.11-16-1 in SLC 16.11-16) shall be limited:

- a. During any calendar quarter to ≤ 1.5 mrem to the whole body and to ≤ 5 mrem to any organ, and
- b. During any calendar year to ≤ 3 mrem to the whole body and to ≤ 10 mrem to any organ.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Calculated dose from release of radioactive materials in liquid effluents exceeding above limits.	A.1 -----NOTE----- If drinking water supply is taken from receiving water body within 3 miles downstream of plant discharge, the Special Report shall also include the results of radiological analyses of the drinking water source and the radiological impact on finished drinking water supplies with regard to 40 CFR 141, Safe Drinking Water Act. ----- Prepare and submit a Special Report to the NRC which identifies the causes for exceeding the limits, corrective actions taken to reduce releases, and actions taken to ensure that subsequent releases are within limits.	30 days

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-3-1 Determine cumulative dose contributions from liquid effluents for current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM.	31 days

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

This SLC applies to the release of radioactive materials in liquid effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 40 CFR Part 141.
3. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-4 Liquid Radwaste Treatment System

COMMITMENT The Liquid Radwaste Treatment System shall be FUNCTIONAL 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 Figure 16.11-16-1 in SLC 16.11-16) 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.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Radioactive liquid waste being discharged without treatment and in excess of above limits. <u>AND</u> Any portion of Liquid Radwaste Treatment System not in operation.	A.1 Prepare and submit a Special Report to the NRC which identifies the reasons liquid radwaste was discharged without treatment, identification of non-functional equipment and reasons for non-functionality, corrective actions taken to restore the equipment to FUNCTIONAL status, and actions taken to prevent recurrence.	30 days

TESTING REQUIREMENTS

NOTE

The Liquid Radwaste Treatment System shall be demonstrated FUNCTIONAL by meeting SLC 16.11-1 and SLC 16.11-3.

TEST	FREQUENCY
TR 16.11-4-1 Project liquid release doses from each unit to UNRESTRICTED AREAS, in accordance with the methodology and parameters in the ODCM, when the Liquid Radwaste Treatment System is not being fully utilized.	31 days

BASES

The FUNCTIONALITY 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 COMMITMENT implements the requirements of 10 CFR Part 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 SLC applies to the release of radioactive materials in liquid effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix A.

REFERENCES (continued)

3. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-5 Chemical Treatment Ponds

COMMITMENT The quantity of radioactive material contained in each Chemical Treatment Pond (CTP) shall be limited by the following expression:

$$\frac{264}{V} \cdot \sum_j \frac{A_j}{(C_j \times 10)} < 1.0$$

excluding tritium and dissolved or entrained noble gases,

where:

A_j = CTP inventory limit for single radionuclide "j", in Curies;

C_j = 10 CFR 20, Appendix B, Table 2, Column 2, concentration for single radionuclide "j", microCuries/milliliter;

V = design volume of liquid and slurry in the CTP, in gallons;
and

264 = conversion unit, microCuries/Curie per milliliter/gallon.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
A.	Quantity of radioactive material in any CTP exceeding above limit.	A.1 Suspend all additions of radioactive material to the CTP.	Immediately
		<u>AND</u> A.2 Initiate corrective action to reduce the CTP contents to within limits.	Immediately

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-5-1 Verify that the quantity of radioactive material contained in each batch of resin/water slurry to be transferred to the CTPs is within limits by analyzing a representative sample of the batch to be transferred. Each batch to be transferred to the CTPs shall be limited by: $\sum_j \frac{c_j}{(C_j \times 10)} < 0.006,$ where: c_j = radioactive resin/water slurry concentration for radionuclide "j" entering the UNRESTRICTED AREA CTPs, in microCuries/milliliter; and C_j = 10 CFR 20, Appendix B, Table 2, Column 2, concentration for single radionuclide "j", in microCuries/milliliter.	Prior to each transfer

BASES The inventory limits of the CTPs are based on limiting the consequences of an uncontrolled release of the pond inventory. The expression in this SLC assumes the pond inventory is uniformly mixed, that the pond is located in an uncontrolled area as defined in 10 CFR Part 20, and that the concentration limit in Note 1 to Appendix B of 10 CFR Part 20 applies.

The batch limits of resin/water slurry transferred to the CTP assure that radioactive material transferred to the CTP are "as low as is reasonably achievable" in accordance with 10 CFR 50.36a. The expression in SLC 16.11-5 assures no batch will be transferred to the CTP unless the sum of the ratios of the activity of the radionuclides to their respective concentration limitation is less than the ratio of the 10 CFR Part 50, Appendix I, Section II.A, total body dose level to the instantaneous whole body dose rate limitation, or that:

$$\sum_j \frac{c_j}{(C_j \times 10)} < \frac{3 \text{ mrem / yr}}{500 \text{ mrem / yr}} = 0.006,$$

where:

BASES (continued)

C_j = radioactive resin/water slurry concentration for radionuclide "j" entering the UNRESTRICTED AREA CTP, in microCuries/milliliter; and,

C_j = 10 CFR Part 20, Appendix B, Table 2, Column 2, concentration for single radionuclide "j", in microCuries/milliliter.

The filter/demineralizers using powdered resin and the blowdown demineralizer are backwashed or sluiced to a holding tank. The tank will be agitated to obtain a representative sample of the resin inventory in the tank. A known weight of the wet, drained resin (moisture content approximately 55 to 60%, bulk density of about 58 pounds per cubic foot) will then be counted. The concentration of the resin slurry to be pumped to the CTPs will then be determined by the formula:

$$C_j = \frac{Q_j W_R}{V_T},$$

where:

Q_j = concentration of radioactive materials in wet, drained resin for radionuclide "j", excluding tritium, dissolved or entrained noble gases, and radionuclides with less than an 8-day half-life. The analysis shall include at least Ce-144, Cs-134, Cs-137, Co-58, and Co-60, in microCuries/gram. Estimates of the Sr-89 and Sr-90 batch concentration shall be included based on the most recent monthly composite analysis (within 3 months);

W_R = total weight of resin in the storage tank in grams (determined from chemistry logs procedures); and,

V_T = total volume of resin water mixture in storage tank to be transferred to the CTPs in milliliters.

The batch limits provide assurance that activity input to the CTP will be minimized, and a means of identifying radioactive material in the inventory limitation of this SLC.

REFERENCES	1.	Catawba Offsite Dose Calculation Manual.
	2.	10 CFR Part 20, Appendix B.
	3.	10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-6 Gaseous Effluents

- COMMITMENT** The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Figure 16.11-16-1 in SLC 16.11-16) shall be limited to the following:
- For noble gases: ≤ 500 mrem/yr to the whole body and ≤ 3000 mrem/yr to the skin; and,
 - For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives > 8 days: ≤ 1500 mrem/yr to any organ.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Dose rate not within limit.	A.1 Restore the release rate to within limits.	Immediately

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-6-1 Verify that the dose rate due to noble gases in gaseous effluents is within limits in accordance with the methodology and parameters in the ODCM.	In accordance with the methodology and parameters in the ODCM
TR 16.11-6-2 Verify that the dose rate due to Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives > 8 days in gaseous effluents is within limits in accordance with the methodology and parameters in the ODCM by obtaining representative samples and performing analyses according to Table 16.11-6-1.	According to Table 16.11-6-1

Table 16.11-6-1
Radioactive Gaseous Waste Sampling and Analysis Program (page 1 of 4)

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	Prior to each release Each Tank Grab Sample	Prior to each release Each Tank	Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁴
2. Containment Purge	Prior to each release Each PURGE ⁽³⁾ Grab Sample	Prior to each release Each PURGE ⁽³⁾	Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁴
3. Unit Vent	7 days ⁽³⁾⁽⁴⁾ Grab Sample	31 days 7 days ⁽³⁾	H-3 (oxide) Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁶ 1x10 ⁻⁴
4. Containment Air Release and Addition System	24 hours ⁽³⁾⁽⁵⁾ Grab Sample	24 hours ⁽³⁾⁽⁵⁾	H-3 (oxide) Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁶ 1x10 ⁻⁴
5. All Release Types as Listed in 3. Above	Continuous ⁽⁶⁾	31 days 7 days ⁽⁷⁾ Charcoal Sample	H-3 (oxide) I-131 I-133	1x10 ⁻⁶ 1x10 ⁻¹² 1x10 ⁻¹⁰
	Continuous ⁽⁶⁾	7 days ⁽⁷⁾ Particulate Sample	Principal Gamma Emitters ⁽²⁾	1x10 ⁻¹¹
	Continuous ⁽⁶⁾	31 days Composite Particulate Sample	Gross Alpha ⁽⁸⁾	1x10 ⁻¹¹
	Continuous ⁽⁶⁾	92 days Composite Particulate Sample	Sr-89, Sr-90	1x10 ⁻¹¹
(continued)				

Table 16.11-6-1

Radioactive Gaseous Waste Sampling and Analysis Program (page 2 of 4)

GASEOUS RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) ⁽¹⁾ (μCi/ml)
6. Waste Monitor Tank Building Ventilation Exhaust	7 days Grab Sample	7 days	Principal Gamma Emitters ⁽²⁾	1x10 ⁻⁴
	Continuous ⁽⁶⁾	7 days ⁽⁹⁾ Charcoal Sample	H-3 (oxide)	1x10 ⁻⁸
	Continuous ⁽⁶⁾	7 days ⁽⁹⁾ Particulate Sample	I-131	1x10 ⁻¹²
	Continuous ⁽⁶⁾	7 days ⁽⁹⁾ Particulate Sample	I-133	1x10 ⁻¹⁰
	Continuous ⁽⁶⁾	31 days Composite Particulate Sample	Principal Gamma Emitters ⁽²⁾	1x10 ⁻¹¹
	Continuous ⁽⁶⁾	92 days Composite Particulate Sample	Gross Alpha	1x10 ⁻¹¹
			Sr-89, Sr-90	1x10 ⁻¹¹

Table 16.11-6-1

Radioactive Gaseous Waste Sampling and Analysis Program (page 3 of 4)

NOTES:

- (1) The LLD is defined, for purposes of these commitments, 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:

$$LLD = \frac{(2.71/T) + 4.65 s_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

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

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

E = the counting efficiency (counts per disintegration);

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

2.22×10^6 = the number of disintegrations per minute per microCurie;

Y = the fractional radiochemical yield, when applicable;

λ = the radioactive decay constant for the particular radionuclide (sec^{-1});

Δt = the elapsed time between midpoint of sample collection and time of counting (sec); and

T = the sample counting time (min).

Typical values of E, V, Y and Δt shall be used in the calculation.

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

Table 16.11-6-1

Radioactive Gaseous Waste Sampling and Analysis Program (page 4 of 4)

- (2) The principal gamma emitters for which the LLD specification applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 in noble gas releases based on grab samples and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, and Ce-141 in Iodine and particulate releases based on continuous samples. The LLD for Ce-144 is 5×10^{-9} $\mu\text{Ci/ml}$ and is based on continuous samples. 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 Radioactive Effluent Release Report, pursuant to Technical Specification 5.6.3 in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.
- (3) Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER stabilization (power level constant at desired power level) after a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period, for at least one of the three gaseous release types with this notation.
- (4) Tritium grab samples shall be taken at least once per 24 hours when the refueling canal is flooded.
- (5) Required sampling and analysis frequency during effluent release via this pathway.
- (6) The ratio of the sample flow volume to the sampled stream flow volume shall be known for the time period covered by each dose or dose rate calculation made in accordance with SLCs 16.11-6, 16.11-8, and 16.11-9.
- (7) Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing, or after removal from sampler. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup, or THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does not apply if: (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the reactor coolant has not increased more than a factor of 3; and (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.
- (8) The composite filter(s) will be analyzed for alpha activity by analyzing one filter per week to ensure that at least four filters are analyzed per collection period.
- (9) Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours to meet LLDs after changing, or after removal from sampler. If the particulate and charcoal sample frequency is changed to a 24-hour frequency, the corresponding LLDs may be increased by a factor of 10 (e.g., LLD for I-131 from 1×10^{-12} to 1×10^{-11} $\mu\text{Ci/ml}$).

BASES

The basic requirements for SLCs concerning effluents from nuclear power reactors are stated in 10 CFR 50.36a. These requirements indicate that compliance with effluent SLCs will keep average annual releases of radioactive material in effluents to small percentages of the limits specified in the old 10 CFR 20.106 (new 10 CFR 20.1301). These requirements further indicate that operational flexibility is allowed, compatible with considerations of health and safety, which may temporarily result in releases higher than such small percentages, but still within the limits specified in the old 10 CFR 20.106 which references Appendix B, Table II concentrations (MPCs). These referenced concentrations are specific values which relate to an annual dose of 500 mrem. It is further indicated in 10 CFR 50.36a that when using operational flexibility, best efforts shall be exerted to keep levels of radioactive materials in effluents as low as is reasonably achievable (ALARA) as set forth in 10 CFR 50, Appendix I.

As stated in the Introduction to Appendix B of the new 10 CFR 20, the gaseous effluent concentration (EC) limits given in Appendix B, Table 2, Column 1, are based on an annual dose of 50 mrem for isotopes for which inhalation or ingestion is limiting or 100 mrem for isotopes for which submersion (noble gases) is limiting. Since release concentrations corresponding to limiting dose rates less than or equal to 500 mrem/year to the whole body, 3000 mrem/year to the skin from noble gases, and 1500 mrem/year to any organ from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days at the site boundary has been acceptable as a SLC limit for gaseous effluents to assure that the limits of 10 CFR 50, Appendix I and 40 CFR 190 are not likely to be exceeded, it should not be necessary to restrict the operational flexibility by incorporating the dose rate associated with the EC value for isotopes based on inhalation/ingestion (50 mrem/year) or the dose rate associated with the EC value for isotopes based on submersion (100 mrem/year).

Having sufficient operational flexibility is especially important in establishing a basis for effluent monitor setpoint calculations. As discussed above, the concentrations stated in the new 10 CFR 20, Appendix B, Table 2, Column 1, relate to a dose of 50 or 100 mrem in a year. When applied on an instantaneous basis, this corresponds to a dose rate of 50 or 100 mrem/year.

These low values are impractical upon which to base effluent monitor setpoint calculations for many gaseous effluent release situations when monitor background, monitor sensitivity, and monitor performance must be taken into account.

Therefore, to accommodate operational flexibility needed for effluent releases, the limits associated with gaseous release rate SLCs will be maintained at the current instantaneous dose rate limit for noble gases of 500 mrem/year to the whole body and 3000 mrem/year to the skin; and for Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate

BASES (continued)

form with half-lives greater than 8 days, an instantaneous dose rate limit of 1500 mrem/year to any organ.

Compliance with the limits of the new 10 CFR 20.1301 will be demonstrated by operating within the limits of 10 CFR 50, Appendix I and 40 CFR 190. Operational history at Catawba has demonstrated that the use of the dose rate values listed above (i.e., 500 mrem/year, 3000 mrem/year, and 1500 mrem/year) as SLC limits has resulted in calculated maximum individual doses to MEMBERS OF THE PUBLIC that are small percentages of the limits of 10 CFR 50, Appendix I and 40 CFR 190.

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 whole body and to less than or equal to 3000 mrem/year to the skin from noble gases, and to less than or equal to 1500 mrem/year to any organ from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days.

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

The required detection capabilities for radioactive material in gaseous waste samples are tabulated in terms of the lower limits of detection (LLDs). Based on NUREG-1301 and Regulatory Guide 1.21, the LLD value of 1×10^{-4} $\mu\text{Ci/ml}$ for grab samples is only applicable to noble gases grab samples and the LLD values for particulate and iodine radionuclides are applicable to continuous charcoal and particulate samples. The Table 16.11-6-1 Gaseous Release Type Number 5 (All Release Types as Listed in 3. Above) and Type Number 6 (Waste Monitor Tank Building Ventilation Exhaust) LLDs are based on weekly samples per NUREG-1301. There are two isotopes with associated LLDs that do not agree directly with NUREG-1301: Ce-144, LLD of 5×10^{-9} $\mu\text{Ci/ml}$, which has historically been applied and achieved for analytical results, and I-133, LLD of 1×10^{-10} $\mu\text{Ci/ml}$, which again has been historically listed, as 1×10^{-9} $\mu\text{Ci/ml}$, for Radioactive Gaseous Waste Sampling but changed to be in agreement with I-131 for weekly (7-day) samples and is not specified in NUREG-1301. Detailed discussion of the LLD, and other detection limits can be found in HASL Procedures Manual, HASL-300 (revised annually), Currie, L.A., "Limits for Qualitative Detection and Quantitative Determination – Application to Radiochemistry," Anal. Chem. **40**, 586-93 (1968), and Hartwell, J.K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

- REFERENCES 1. Catawba Offsite Dose Calculation Manual.

REFERENCES (continued)

2. 10 CFR Part 20, Appendix B.
3. 10 CFR Part 20.
4. 10 CFR Part 50.
5. 40 CFR Part 190.
6. NUREG-1301.
7. Regulatory Guide 1.21.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-7 Radioactive Gaseous Effluent Monitoring Instrumentation

COMMITMENT The Radioactive Gaseous Effluent Monitoring Instrumentation channels shown in Table 16.11-7-1 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of SLC 16.11-6 are not exceeded.

AND

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: Conditions B and K are applicable at all times. All other Conditions are applicable as shown in Table 16.11-7-1.

REMEDIAL ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Radioactive Gaseous Effluent Monitoring Instrumentation channel(s) Alarm/Trip Setpoint less conservative than required.	A.1 Suspend the release of radioactive gaseous effluents monitored by the affected channel(s).	Immediately
	<u>OR</u> A.2 Declare the channel(s) non-functional.	Immediately
B. One or more Radioactive Gaseous Effluent Monitoring Instrumentation channel(s) non-functional.	B.1 Enter the applicable Conditions and Required Actions specified in Table 16.11-7-1 for the channel(s).	Immediately
	<u>AND</u> B.2.1 Restore channel to FUNCTIONAL status.	14 Days (*Note 1)
	<u>OR</u> B.2.2 Restore channel to FUNCTIONAL status.	30 Days (*Note 1)

*Note 1 – Required Action B.2.1 applies to Instrument 1.a ONLY. (continued)
Required Action B.2.2 applies to Instruments 1.b, 2, 3.a, 3.c, 3.d, 3.e, 5, 6.a, and 6.b listed in Table 16.11-7-1.

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One channel non-functional.	C.1 Verify that EMF-36 (Low Range) is FUNCTIONAL.	Prior to initiating a release
	<u>OR</u>	
	C.2.1 Analyze two independent samples of the tank's contents.	Prior to initiating a release
	<u>AND</u>	
	C.2.2 Perform independent verification of the discharge line valving.	Prior to initiating a release
	<u>AND</u>	
	C.2.3.1 Perform independent verification of manual portion of the computer input for release rate calculations performed by computer.	Prior to initiating a release
	<u>OR</u>	
	C.2.3.2 Perform independent verification of entire calculations for release rate calculations performed manually.	Prior to initiating a release
	<u>OR</u>	
	C.3 Suspend release of radioactive effluents via this pathway.	Immediately

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One or more flow rate measurement device channel(s) non-functional.	D.1 Estimate the flow rate of the release.	Once per 4 hours during releases
E. One or more Noble Gas Activity Monitor channel(s) non-functional.	-----NOTE----- <u>IF</u> 0EMF41 is NON-FUNCTIONAL <u>AND</u> either 1EMF36 <u>OR</u> 2EMF36 is NON-FUNCTIONAL, perform SLC 16.7-10, Required Action G.2 ----- E.1 Obtain grab samples from effluent pathway. <u>AND</u> E.2 Perform an analysis of grab samples for radioactivity.	Once per 12 hours during releases Within 24 hours of obtaining the sample

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Noble Gas Activity Monitor (EMF-39 – Low Range) providing automatic termination of release via the Containment Purge Exhaust System (CPES) non-functional.	F.1 -----NOTE----- In order to utilize Required Action F.1, the following conditions must be satisfied: 1. The affected unit is in MODES 5 or 6. 2. EMF-36 is FUNCTIONAL and in service for the affected unit. 3. The Reactor Coolant System for the affected unit has been vented. 4. Either the reactor vessel head is in place (bolts are not required), or if it is not in place, the lifting of heavy loads over the reactor vessel and the movement of irradiated fuel assemblies within containment have been suspended. ----- Restore the non-functional channel to FUNCTIONAL status.	12 hours
G. Required Action and associated Completion Time of Condition F not met. <u>OR</u> Required Action F.1 not utilized.	G.1 Suspend PURGING of radioactive effluents via this pathway.	Immediately

(continued)

REMEDIAL ACTIONS (continued)

[illegible]

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. (continued)	I.3 -----NOTE----- Applicable to effluent releases via the Steam Generator Blowdown (BB) System atmospheric vent valve (BB-27) in the off-normal mode. ----- Perform an analysis of grab samples for radioactivity at a lower limit of detection of 10^{-7} microCurie/ml.	Once per 12 hours during releases when secondary specific activity is > 0.01 microCurie/gm DOSE EQUIVALENT I-131 <u>AND</u> Once per 24 hours during releases when secondary specific activity is ≤ 0.01 microCurie/gm DOSE EQUIVALENT I-131
J. Noble Gas Activity Monitor (EMF-39 – Low Range) providing automatic termination of release via the Containment Air Release and Addition System non-functional.	J.1 Verify that EMF-36 is FUNCTIONAL. <u>OR</u> J.2.1 Analyze two independent samples of the containment atmosphere. <u>AND</u>	Prior to initiating a release Prior to initiating a release (continued)

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
J. (continued)	J.2.2 Perform independent verification of the discharge line valving. <u>AND</u> J.2.3.1 Perform independent verification of manual portion of the computer input for release rate calculations performed by computer. <u>OR</u> J.2.3.2 Perform independent verification of entire calculations for release rate calculations performed manually.	Prior to initiating a release Prior to initiating a release Prior to initiating a release

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
K. Required Action and associated Completion Time of Condition B or F not met.	K.1 Explain why the non-functionality was not corrected within the specified Completion Time.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

-----NOTE-----
Refer to Table 16.11-7-1 to determine which TRs apply for each Radioactive Gaseous Effluent Monitoring Instrumentation channel.

TEST	FREQUENCY
TR 16.11-7-1 Perform CHANNEL CHECK.	Prior to each release
TR 16.11-7-2 -----NOTE----- For Instruments 1a, 4, and 5, a SOURCE CHECK for these channels shall be the qualitative assessment of channel response when the channel sensor is exposed to a light-emitting diode. ----- Perform SOURCE CHECK.	Prior to each release
TR 16.11-7-3 Perform CHANNEL CHECK.	12 hours
TR 16.11-7-4 Perform CHANNEL CHECK.	24 hours
TR 16.11-7-5 Perform CHANNEL CHECK.	7 days

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-7-6 -----NOTE----- For Instruments 2 and 3a, a SOURCE CHECK for these channels shall be the qualitative assessment of channel response when the channel sensor is exposed to a light-emitting diode. ----- Perform SOURCE CHECK.	31 days
TR 16.11-7-7 -----NOTE----- For Instruments 1a, 3a, 3c, 5, and 6a, the COT shall also demonstrate, as applicable, that automatic isolation of this pathway and control room alarm annunciation (for EMF-58, alarm annunciation is in the Monitor Tank Building control room and on the Monitor Tank Building control panel remote annunciator panel) occur if any of the following conditions exist: a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or b. Circuit failure/instrument downscale failure (alarm only) ----- Perform COT.	18 months
TR 16.11-7-8 -----NOTE----- For Instruments 2 and 4, the COT shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exist: a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or b. Circuit failure/instrument downscale failure (alarm only) ----- Perform COT.	18 months

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-7-9 -----NOTE----- For Instruments 1a, 2, 3a, 3c, 4, 5, and 6a, the initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used. ----- Perform CHANNEL CALIBRATION.	18 months

Table 16.11-7-1

Radioactive Gaseous Effluent Monitoring Instrumentation (page 1 of 2)

INSTRUMENT	REQUIRED CHANNELS	CONDITIONS	APPLICABLE MODES	TESTING REQUIREMENTS
1. Waste Gas Holdup System				
1.a Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-50 – Low Range)	1 per station	<u>B, K</u> A, C	<u>At all times</u> (Note 3)	TR 16.11-7-1 TR 16.11-7-2 TR 16.11-7-7 TR 16.11-7-9
1.b Effluent System Flow Rate Measuring Device	1 per station	<u>B, K</u> D	<u>At all times</u> (Note 3)	TR 16.11-7-1 TR 16.11-7-9
2. Condenser Evacuation System Noble Gas Activity Monitor (EMF-33) (BB-27 is only isolation function required) (Note 1)	1	<u>B, K</u> A, I	<u>At all times</u> (Note 4)	TR 16.11-7-3 TR 16.11-7-6 TR 16.11-7-8 TR 16.11-7-9
3. Vent System				
3.a Noble Gas Activity Monitor (EMF-36 – Low Range)	1	A, B, E, K	At all times	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
3.b Deleted.				
3.c Particulate Sampler (EMF-35)	1	<u>B, K</u> A, H	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
3.d Unit Vent Stack Flow Rate Meter (no alarm/trip function)	1	<u>B, K</u> D	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9
3.e Unit Vent Radiation Monitor Flow Meter	1	<u>B, K</u> E	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9
4. Containment Purge System Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-39 – Low Range)	1	A, F, G, K	5, 6	TR 16.11-7-2 TR 16.11-7-3 TR 16.11-7-8 TR 16.11-7-9

(continued)

Table 16.11-7-1

Radioactive Gaseous Effluent Monitoring Instrumentation (page 2 of 2)

INSTRUMENT	REQUIRED CHANNELS	CONDITIONS	APPLICABLE MODES	TESTING REQUIREMENTS
5. Containment Air Release and Addition System Noble Gas Activity Monitor – Providing Alarm and Automatic Termination of Release (EMF-39 – Low Range)	1	<u>B, K</u> A, J	<u>At all times</u> 1, 2, 3, 4, 5, 6	TR 16.11-7-2 TR 16.11-7-3 TR 16.11-7-7 TR 16.11-7-9
6. Monitor Tank Building HVAC				
6.a Noble Gas Activity Monitor – Providing Alarm (EMF-58 – Low Range)	1 per station	<u>B, K</u> A, E	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-6 TR 16.11-7-7 TR 16.11-7-9
6.b Effluent Flow Rate Measuring Device	1 per station	<u>B, K</u> D	<u>At all times</u> (Note 2)	TR 16.11-7-4 TR 16.11-7-9

Note 1: The setpoint is as required by the primary to secondary leak rate monitoring program.

Note 2: Applicable at all times, unless the effluent pathway is mechanically isolated; thus, a release to the environment is not possible.

Note 3: Applicable at all times, unless the effluent pathway is mechanically isolated; thus, a release to the environment is not possible. Utilization of this note requires the pathway be isolated by locked close valve.

Note 4: When air ejectors are in operation, apply Required Action I.3 when air ejectors are NOT in operation.

BASES

The Radioactive Gaseous Effluent Monitoring Instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The Alarm/Trip Setpoints for these instruments shall be calculated 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. Conservative Alarm/Trip Setpoints may be used during a release provided they are less than or equal to the setpoints determined by the methodology and parameters of the ODCM. The FUNCTIONALITY 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. The sensitivity of any noble gas activity monitor used to show compliance with the gaseous effluent release requirements of SLC 16.11-8 shall be such that concentrations as low as 1×10^{-6} $\mu\text{Ci/cc}$ are measurable.

Regarding Notes 2 and 3 of Table 16.11-7-1, isolation of the effluent pathway is to be by mechanical means (e.g., valve closure). Electrical or pneumatic isolation is not required, unless the isolation is designed to receive an automatic signal to open. For EMF-50 Low Range only, isolation of the effluent pathway is only considered complete if isolated by a locked closed valve.

In MODES 5 and 6, initiation of the Containment Purge Exhaust System (CPES) with EMF-39 non-functional is not permissible. The basis for Required Action F.1 is to allow the continued operation of the CPES with EMF-39 initially FUNCTIONAL. Continued operation of the CPES is contingent upon the ability of the affected unit to meet the requirements as noted in Required Action F.1.

TR 16.11-7-7 requires the performance of a COT on the applicable Radioactive Gaseous Effluent Radiation Monitors. The test ensures that a signal from the control room module can generate the appropriate alarm and actuations. The required actuations/isolations for a High Radiation condition (i.e., radiation level above its Trip 2 setpoint) are listed below for each monitor.

0EMF-50 - Waste Gas Discharge Monitor

1WG160 closes when EMF-50 detects radiation level above its setpoint.

1/2EMF-36 - Unit Vent Noble Gas Monitor

The following actuations occur when EMF-36 detects radiation level above its setpoint:

1. Containment Air Release and Addition System fans discharge to unit vent valve VQ10 closes.
2. Auxiliary Building unfiltered ventilation exhaust fans A and B stop.
3. Fuel Handling Ventilation Exhaust System (FHVES) exhaust trains align to the filter units.
4. (For 1EMF-36 only) 1WG160 closes.

1/2EMF-35 - Unit Vent Particulate Monitor (Sampler)

The following actuations occur when EMF-35 detects radiation level above its setpoint:

1. Containment Air Release and Addition System fans discharge to unit vent valve VQ10 closes.
2. Auxiliary Building unfiltered ventilation exhaust fans A and B stop.

BASES (continued)

3. Fuel Handling Ventilation Exhaust System (FHVES) exhaust trains align to the filter units.
4. ((For 1EMF-35 only) 1WG160 closes.

1/2EMF-39 - Containment Noble Gas Monitor

The following actuations occur when EMF-39 detects radiation level above its setpoint:

1. Signals are provided to both trains of the Solid State Protection System (SSPS) to initiate a CPES isolation. This is verified by observing that Relays K615 in the SSPS A output cabinet and the SSPS B output cabinet are latched.
2. EMF-39 isolates the CPES without going through the SSPS by stopping CPES supply fans A and B, CPES exhaust fans A and B, and by closing the appropriate valves and dampers.
3. Containment Evacuation Alarm, unless the source range trip is blocked.

0EMF-58

This monitor provides no control function.

TR 16.11-7-8 requires the performance of a COT on the Condensate Steam Air Ejector Exhaust Monitor, 1/2EMF-33 and Containment Noble Gas Monitor, 1/2EMF-39. The test ensures that a signal from the control room module can generate the appropriate alarm and actuations. The required actuations/isolations for a High Radiation condition (i.e., radiation level above its Trip 2 setpoint) are listed below.

1/2EMF-33 - Condensate Steam Air Ejector Exhaust Monitor

The following actuations occur when EMF-33 detects radiation level above its setpoint:

1. Closure of BB27 is required in order to isolate the Blowdown Tank from the environment. Because of plant limitations/restrictions:
 - a. Opening the valve (in order to verify it goes closed on a High Radiation signal) is only possible during outages due to the negative effects on the Blowdown System with the unit at power.
 - b. Testing during innages will be by verification of relay contacts opening in the valve circuit.
2. Closure of BB24, BB65, BB69, and BB73 is required to minimize the amount of potentially contaminated material being delivered to the Blowdown Tank.
3. Closure of NM269, NM270, NM271, and NM272 is required to minimize the amount of potentially contaminated material being delivered to the Conventional Sampling System.
4. Closure of NM267 is required to minimize the amount of potentially contaminated material being delivered to the Condensate Storage Tank by isolating flow through EMF-34.
5. Closure of BB48 is required to minimize the amount of potentially contaminated material being delivered from the Blowdown System discharge to the Turbine Building sump.

BASES (continued)

1/2EMF-39 - Containment Noble Gas Monitor

The following actuations occur when EMF-39 detects radiation level above its setpoint:

1. Signals are provided to both trains of the Solid State Protection System (SSPS) to initiate a Containment Air Release and Addition System isolation. This is verified by observing that relays K615 in the SSPS Train A output cabinet and the SSPS Train B output cabinet are latched.
2. Containment Evacuation Alarm, unless the source range trip is blocked.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 20.
3. AR 02400313, 0EMF-50L Non-Functional.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-8 Dose - Noble Gases

COMMITMENT The air dose due to noble gases released in gaseous effluents, from each unit, to areas at and beyond the SITE BOUNDARY (see Figure 16.11-16-1 in SLC 16.11-16) shall be limited to the following:

- a. During any calendar quarter: ≤ 5 mrad for gamma radiation and ≤ 10 mrad for beta radiation, and
- b. During any calendar year: ≤ 10 mrad for gamma radiation and ≤ 20 mrad for beta radiation.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Calculated air dose from radioactive noble gases in gaseous effluents exceeding any of above limits.	A.1 Prepare and submit a Special Report to the NRC which identifies the causes for exceeding the limits, corrective actions taken to reduce releases, and actions taken to ensure that subsequent releases are within limits.	30 days

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-8-1 Determine cumulative dose contributions from noble gases in gaseous effluents for current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM.	31 days

BASES

This SLC is provided to implement the requirements of Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. The COMMITMENT implements the guides set forth in Section II.B of Appendix I. The REMEDIAL ACTION statement provides 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 TESTING 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 commitment applies to the release of radioactive materials in gaseous effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-9 Dose - Iodine-131, Iodine-133, Tritium, and Radioactive Material in Particulate Form

COMMITMENT The dose to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives > 8 days in gaseous effluents released, from each unit, to areas at and beyond the SITE BOUNDARY (see Figure 16.11-16-1 in SLC 16.11-16) shall be limited to the following:

- a. During any calendar quarter: ≤ 7.5 mrem to any organ, and
- b. During any calendar year: ≤ 15 mrem to any organ.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Calculated dose from the release of Iodine-131, Iodine-133, tritium, and radioactive material in particulate form with half-lives > 8 days in gaseous effluents exceeding any of above limits.	A.1 Prepare and submit a Special Report to the NRC which identifies the causes for exceeding the limits, corrective actions taken to reduce releases, and actions taken to ensure that subsequent releases are within limits.	30 days

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-9-1 Determine cumulative dose contributions from Iodine-131, Iodine-133, tritium, and radioactive material in particulate form with half-lives > 8 days in gaseous effluents for current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM.	31 days

BASES This SLC is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10 CFR Part 50, and are the guides set forth in Section II.C of Appendix I. The REMEDIAL ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive materials in gaseous effluents to UNRESTRICTED AREAS will be kept “as low as is reasonably achievable”. The ODCM calculational methods specified in the TESTING REQUIREMENTS implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated. The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, “Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I,” Revision 1, October 1977 and Regulatory Guide 1.111, “Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases 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 COMMITMENTS 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 commitment applies to the release of radioactive materials in gaseous effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

- REFERENCES**
1. Catawba Offsite Dose Calculation Manual.
 2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-10 Gaseous Radwaste Treatment System

COMMITMENT The VENTILATION EXHAUST TREATMENT SYSTEM and the WASTE GAS HOLDUP SYSTEM shall be FUNCTIONAL and appropriate portions of these systems 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 Figure 16.11-16-1 in SLC 16.11-16) would exceed either:

- 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 of a MEMBER OF THE PUBLIC.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Radioactive gaseous waste being discharged without treatment and in excess of above limits.	A.1 Prepare and submit a Special Report to the NRC which identifies non-functional equipment and reasons for non-functionality, actions taken to restore the equipment to FUNCTIONAL status, and actions taken to prevent recurrence.	30 days

TESTING REQUIREMENTS

NOTE

The installed VENTILATION EXHAUST TREATMENT SYSTEM and WASTE GAS HOLDUP SYSTEM shall be demonstrated FUNCTIONAL by meeting SLC 16.11-6, SLC 16.11-8, and SLC 16.11-9.

TEST	FREQUENCY
TR 16.11-10-1 Project gaseous release doses from each unit to areas at and beyond the SITE BOUNDARY, in accordance with the methodology and parameters in the ODCM, when Gaseous Radwaste Treatment Systems are not being fully utilized.	31 days

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

This SLC applies to the release of radioactive materials in gaseous effluents from each unit at the site. When shared radwaste treatment systems are used by more than one unit on a site, the wastes from all units are mixed for shared treatment; by such mixing, the effluent releases cannot accurately be ascribed to a specific unit. An estimate should be made of the contributions from each unit based on input conditions, e.g., flow rates and radioactivity concentrations, or, if not practicable, the treated effluent releases may be allocated equally to each of the radioactive waste producing units sharing the radwaste treatment system. For determining conformance to COMMITMENTS, these allocations from shared radwaste treatment systems are to be added to the releases specifically attributed to each unit to obtain the total releases per unit.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-11 Solid Radioactive Wastes

COMMITMENT	Radioactive wastes shall be processed and packaged to ensure compliance with the applicable requirements of 10 CFR Part 20, 10 CFR Part 61, 10 CFR Part 71, and state regulations governing the transportation and disposal of radioactive wastes. The Solid Radwaste System or an approved alternative process shall be used in accordance with the PROCESS CONTROL PROGRAM for the solidification of liquid or wet radioactive wastes or the dewatering of wet radioactive wastes to be shipped for direct disposal at a 10 CFR Part 61 licensed disposal site. Wastes shipped for offsite processing in accordance with the processor's specifications and transportation requirements are not required to be solidified or dewatered to meet disposal requirements.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Applicable regulatory requirements for solidified or dewatered wastes not satisfied.	A.1 Suspend shipment of inadequately processed waste.	Immediately
	<u>AND</u> A.2 Take action to correct the PROCESS CONTROL PROGRAM, procedures, or solid waste equipment as necessary to prevent recurrence.	Prior to next shipment for disposal of solidified or dewatered wastes

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Solidification test as described in the PROCESS CONTROL PROGRAM fails to verify solidification.	B.1 Suspend solidification of the batch under test and follow PROCESS CONTROL PROGRAM guidance for test failures.	Immediately
	<u>AND</u> B.2 -----NOTE----- Once a subsequent test verifies solidification, solidification of the batch may be resumed as directed by the PROCESS CONTROL PROGRAM. ----- Modify the PROCESS CONTROL PROGRAM as required to assure solidification of subsequent batches of waste.	Prior to next solidification for shipment of waste for disposal at a 10 CFR Part 61 disposal site
C. Solidification or dewatering for disposal not performed in accordance with the PROCESS CONTROL PROGRAM.	C.1 Reprocess the waste in accordance with PROCESS CONTROL PROGRAM requirements.	Prior to shipment for disposal of the inadequately processed waste that requires solidification or dewatering
	<u>OR</u> C.2 Follow PROCESS CONTROL PROGRAM or procedure guidance for alternative free-standing liquid verification to ensure the waste in each container meets disposal requirements and take appropriate administrative action to prevent recurrence.	Prior to shipment for disposal of the inadequately processed waste that requires solidification or dewatering

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Solid waste equipment incapable of supporting COMMITMENT.	D.1 Restore the equipment to a status capable of supporting COMMITMENT.	In a time frame supporting COMMITMENT
	<u>OR</u> D.2 Provide for alternative capability to process wastes as necessary to satisfy all applicable transportation and disposal requirements.	In a time frame supporting COMMITMENT

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-11-1 Verify, using the PROCESS CONTROL PROGRAM, the solidification of at least one representative test specimen from at least every tenth batch of each type of radioactive waste to be solidified for disposal at a 10 CFR Part 61 disposal site.	Every tenth batch of each type of radioactive waste to be solidified

BASES This SLC implements the requirements of 10 CFR Part 50.36a and General Design Criterion 60 of Appendix A to 10 CFR Part 50 and requirements to use a PROCESS CONTROL PROGRAM to meet applicable 10 CFR Part 61 waste form criteria for solidified and dewatered radioactive wastes.

- The PROCESS CONTROL PROGRAM describes administrative and operational controls used for the solidification of liquid or wet solid radioactive wastes in order to meet applicable 10 CFR Part 61 waste form requirements.
- The PROCESS CONTROL PROGRAM describes the administrative and operational controls used for the dewatering of wet radioactive wastes to meet 10 CFR Part 61 free-standing water requirements.
- The process parameters used in establishing the PROCESS CONTROL PROGRAM shall be based on demonstrated processing of actual or simulated liquid or wet solid wastes and must adequately verify that the final product of solidification or dewatering meets all applicable federal, state, and disposal site requirements.

REFERENCES

1. 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."
2. 10 CFR Part 50, Appendix A.
3. 10 CFR Part 20, "Standards for Protection Against Radiation."
4. 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste."
5. 10 CFR Part 71, "Packaging and Transportation of Radioactive Materials."
6. PROCESS CONTROL PROGRAM Manual.
7. Generic Letter 84-12, "Compliance with 10 CFR Part 61 and Implementation of the Radiological Effluent Technical Specifications (RETS) and Attendant Process Control Program (PCP)."
8. Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program."

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-12 Total Dose

COMMITMENT 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 ≤ 25 mrem to the whole body or any organ, except the thyroid, which shall be limited to ≤ 75 mrem.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Calculated doses from releases exceeding twice the specified limits of SLC 16.11-3, SLC 16.11-8, or SLC 16.11-9.	A.1 Verify, by calculation, that the cumulative dose from direct radiation contributions and outside storage tanks and radioactivity releases are within the total dose limit.	Immediately
	<u>AND</u> A.2 -----NOTE----- Only required to be performed if the total dose limit is exceeded. ----- Prepare and submit a Special Report to the NRC which identifies corrective actions to be taken to reduce subsequent releases to prevent recurrence and schedule for achieving conformance with specified limits.	30 days

TESTING REQUIREMENTS

NOTE

Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with SLC 16.11-3, SLC 16.11-8, and SLC 16.11-9, and in accordance with the methodology and parameters specified in the ODCM.

TEST	FREQUENCY
TR 16.11-12-1 Determine cumulative dose contributions from direct radiation from the units and from radwaste storage tanks in accordance with the methodology and parameters specified in the ODCM.	When calculated doses from effluent releases exceed twice the limits of SLC 16.11-3, SLC 16.11-8, or SLC 16.11-9

BASES

This SLC is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR Part 20 by 46 FR 18525. The SLC 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 and from outside storage tanks are kept small.

This Special Report, as defined in 10 CFR 20.2203(a)(4), shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered.

BASES (continued)

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 10 CFR 20.2203(a)(4), is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 and a variance is granted 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 SLC 16.11-1 and SLC 16.11-6.

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.

- REFERENCES
1. Catawba Offsite Dose Calculation Manual.
 2. 10 CFR Part 20.
 3. 40 CFR Part 190.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-13 Monitoring Program

COMMITMENT The Radiological Environmental Monitoring Program shall be conducted as specified in Table 16.11-13-1.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Radiological Environmental Monitoring Program not being conducted as specified in Table 16.11-13-1.	A.1 Identify the reasons for not conducting the program as required and the plans for preventing a recurrence in the Annual Radiological Environmental Operating Report.	In the next scheduled Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2
B. Radioactivity level resulting from plant effluents of environmental sampling medium at a specified location in excess of reporting limits of Table 16.11-13-2 when averaged over any calendar quarter.	B.1 Prepare and submit a Special Report that identifies the cause(s) for exceeding the limits and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to a MEMBER OF THE PUBLIC is less than the calendar year limits of SLC 16.11-3, SLC 16.11-8, and SLC 16.11-9.	30 days

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Milk or fresh leafy vegetation samples unavailable from one or more sample location(s) required by Table 16.11-13-1.	C.1 -----NOTE----- Specific location(s) from which samples were unavailable may be deleted from the program. ----- Revise the Radiological Environmental Monitoring Program to identify location(s) for obtaining replacement samples. <u>AND</u> C.2 Identify the cause of the unavailability of samples and identify and justify new location(s) for obtaining replacement samples in the Annual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).	30 days In the next scheduled Annual Radioactive Effluent Release Report pursuant to Technical Specification 5.5.1

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-13-1-----NOTE----- The maximum values for the lower limits of detection shall be as specified in Table 16.11-13-3. ----- Collect and analyze radiological environmental monitoring samples pursuant to Table 16.11-13-1 from the specific locations given in the table and figure(s) in the ODCM.	In accordance with Table 16.11-13-1

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 1 of 7)

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

(continued)

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 2 of 7)

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
2. Airborne Radioiodine and Particulates	Samples from five locations. Three samples from close to the three SITE BOUNDARY locations, in different sectors, of the highest calculated annual average ground-level D/Q; One sample from the vicinity of a community having the highest calculated annual average ground-level D/Q; and One sample from a control location, as for example 15 to 30 km distant and in the least prevalent wind direction.	Continuous sampler operation with sample collection weekly, or more frequently if required by dust loading.	<u>Radioiodine Canister:</u> I-131 analysis weekly. <u>Particulate Sampler:</u> Gross beta radioactivity analysis following filter change; ⁽³⁾ and gamma isotopic analysis ⁽⁴⁾ of composite (by location) quarterly.

(continued)

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 3 of 7)

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
3. Waterborne			
a. Surface ⁽⁶⁾	One sample upstream. One sample downstream.	Composite sample over 1-month period ⁽⁶⁾ .	Gamma isotopic analysis ⁽⁴⁾ monthly. Composite for tritium analysis quarterly.
b. Ground	Samples from one or two sources only if likely to be affected ⁽⁷⁾ .	Quarterly	Gamma isotopic ⁽⁴⁾ and tritium analysis quarterly.
c. Drinking	One sample of each of one to three of the nearest water supplies that could be affected by its discharge. One sample from a control location.	Composite sample over 2-week period ⁽⁶⁾ when I-131 analysis is performed; monthly composite otherwise.	I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year ⁽⁸⁾ . Composite for gross beta and gamma isotopic analyses ⁽⁴⁾ monthly. Composite for tritium analysis quarterly.
d. Sediment from Shoreline	One sample from downstream area with existing or potential recreational value.	Semiannually	Gamma isotopic analysis ⁽⁴⁾ semiannually.

(continued)

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 4 of 7)

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
4. Ingestion			
a. Milk	Samples from milking animals in three locations within 5-km distance having the highest dose potential. If there are none, then one sample from milking animals in each of three areas between 5 to 8 km distant where doses are calculated to be greater than 1 mrem per year ⁽⁸⁾ . One sample from milking animals at a control location 15 to 30 km distant and in the least prevalent wind direction.	Semimonthly when animals are on pasture; monthly at other times.	Gamma isotopic ⁽⁴⁾ and I-131 analysis semi-monthly when animals are on pasture; monthly at other times.
b. Fish and Invertebrates	One sample each of a predatory species, a bottom feeder and a forage species in vicinity of plant discharge area. One sample each of a predatory species, a bottom feeder and a forage species in areas not influenced by plant discharge.	Sample in season, or semiannually if they are not seasonal.	Gamma isotopic analysis ⁽⁴⁾ on edible portions.
(continued)			

Table 16.11-13-1
Radiological Environmental Monitoring Program (page 5 of 7)

EXPOSURE PATHWAY AND/OR SAMPLE	NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾	SAMPLING AND COLLECTION FREQUENCY	TYPE AND FREQUENCY OF ANALYSIS
4. Ingestion (Continued) c. Food Products	One sample of each principal class of food products from any area that is irrigated by water in which liquid plant wastes have been discharged. Samples of three different kinds of broad leaf vegetation grown nearest each of two different offsite locations of highest predicted annual average ground level D/Q if milk sampling is not performed. One sample of each of the similar broad leaf vegetation grown 15 to 30 km distant in the least prevalent wind direction if milk sampling is not performed.	At time of harvest⁽⁹⁾. Monthly, when available. Monthly, when available.	Gamma isotopic analyses⁽⁴⁾ on edible portion. Gamma isotopic⁽⁴⁾ and I-131 analysis. Gamma isotopic⁽⁴⁾ and I-131 analysis.

Table 16.11-13-1

Radiological Environmental Monitoring Program (page 6 of 7)

NOTES:

- (1) Specific parameters of distance and direction sector from the centerline of the station, and additional description where pertinent, shall be provided for each and every sample location in Table 16.11-13-1 in a table and figure(s) in the ODCM. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978, and to Radiological Assessment Branch Technical Position, Revision 1, November 1979. Deviations are permitted from the required sampling schedule if specimens are unobtainable due to circumstances such as hazardous conditions, seasonal unavailability, and malfunction of automatic sampling equipment. If specimens are unobtainable due to sampling equipment malfunction, effort shall be made to complete corrective action prior to the end of the next sampling period. All deviations from the sampling schedule shall be documented in the Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2. It is recognized that, at times, it may not be possible or practicable to continue to obtain samples of the media of choice at the most desired location or time. In these instances suitable alternative media and locations may be chosen for the particular pathway in question and appropriate substitutions made within 30 days in the Radiological Environmental Monitoring Program. In lieu of any Licensee Event Report required by 10 CFR 50.73 and pursuant to Technical Specification 5.6.3, identify the cause of the unavailability of samples for that pathway and identify the new location(s) for obtaining replacement samples in the next Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).
- (2) One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. For the purposes of this table, a thermoluminescent dosimeter (TLD) is considered to be one phosphor; two or more phosphors in a packet are considered as two or more dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. (The 40 stations is not an absolute number. The number of direct radiation monitoring stations may be reduced according to geographical limitations; e.g., at an ocean site, some sectors will be over water so that the number of dosimeters may be reduced accordingly. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used and should be selected to obtain optimum dose information within minimal fading.)
- (3) Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than 10 times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.

Table 16.11-13-1

Radiological Environmental Monitoring Program (page 7 of 7)

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

Table 16.11-13-2
Reporting Levels for Radioactivity Concentrations in Environmental Samples

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	20,000 ⁽¹⁾				
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	

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

Table 16.11-13-3
Lower Limit of Detection (LLD)⁽³⁾ (page 1 of 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	2000 ⁽⁵⁾					
Mn-54	15		130			
Fe-59	30		260			
Co-58, 60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
I-131	1 ⁽⁴⁾	0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15			15		

Table 16.11-13-3

Lower Limit of Detection (LLD)⁽³⁾ (page 2 of 3)

NOTES:

- (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 Technical Specification 5.6.2.
- (2) Required detection capabilities for thermoluminescent dosimeters used for environmental measurements shall be in accordance with the recommendations of Regulatory Guide 4.13.
- (3) The LLD is defined, for purposes of these commitments, as the smallest concentrations 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:

$$LLD = \frac{(2.71/T) + 4.65 s_b}{E \cdot V \cdot 2.22 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD = the "a priori" lower limit of detection (picoCuries 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 picoCurie;

Y = the fractional radiochemical yield, when applicable;

λ = the radioactive decay constant for the particular radionuclide (sec^{-1});

Δt = the elapsed time between environmental collection, or end of the sample collection period, and time of counting (sec); and

T = the sample counting time (min).

Table 16.11-13-3

Lower Limit of Detection (LLD)⁽³⁾ (page 3 of 3)

Typical values of E, V, Y and Δt shall 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 Technical Specification 5.6.2.

- (4) LLD for drinking water samples. If no drinking water pathway exists, the LLD of gamma isotopic analysis may be used.
- (5) If no drinking water pathway exists, a value of 3000 pCi/l may be used.

BASES

The Radiological Environmental Monitoring Program required by this SLC provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the 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. The initially specified Monitoring Program will be effective for at least the first 3 years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 16.11-13-3 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

With the level of radioactivity in an environmental sampling medium at a specified location exceeding the reporting levels of Table 16.11-13-2 when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days a Special Report that defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose to a MEMBER OF THE PUBLIC is less than the calendar year limits of SLC 16.11-3, SLC 16.11-8, and SLC 16.11-9. When more than one of the radionuclides in Table 16.11-13-2 are detected in the sampling medium, this report shall be submitted if:

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

When radionuclides other than those in Table 16.11-13-2 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 SLC 16.11-3, SLC 16.11-8, and SLC 16.11-9. 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 Technical Specification 5.6.2. The methodology and parameters used to estimate the potential annual dose to a MEMBER OF THE PUBLIC shall be indicated in the 30-day Special Report.

BASES (continued)

Detailed discussion of the LLD, and other detection limits, can be found in HASL Procedures Manual, HASL-300 (revised annually), Currie, L.A., "Limits for Qualitative Detection and Quantitative Determination – Application to Radiochemistry," Anal. Chem. 40, 586-93 (1968), and Hartwell, J.K., "Detection Limits for Radioanalytical Counting Techniques," Atlantic Richfield Hanford Company Report ARH-SA-215 (June 1975).

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-14 Land Use Census

COMMITMENT

-----NOTE-----
Broad leaf vegetation sampling of at least three different kinds of vegetation may be performed at the SITE BOUNDARY in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Requirements for broad leaf vegetation sampling in Table 16.11-13-1 (Item 4c) shall be followed, including analysis of control samples.

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 > 50 m² (500 ft²) producing broad leaf vegetation.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Location(s) identified which yield a calculated dose or dose commitment greater than values currently calculated in SLC 16.11-9.	A.1 Identify the new location(s) in the Annual Radioactive Effluent Release Report.	In the next scheduled Annual Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3
B. Location(s) identified which yield a calculated dose or dose commitment (via same exposure pathway) 20% greater than at a location from which samples are currently being obtained in accordance with SLC 16.11-13.	B.1 Add the new location(s) to the Radiological Environmental Monitoring Program. <u>AND</u>	30 days (continued)

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 Identify the new location(s), revised figure(s) and table(s) for the ODCM, and information supporting the change in sampling location(s) in the Annual Radioactive Effluent Release Report.	In the next scheduled Annual Radioactive Effluent Release Report pursuant to Technical Specification 5.5.1

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-14-1-----NOTE----- The results of the Land Use Census shall be included in the Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2. ----- Conduct a Land Use Census during the growing season using the information which will provide the best results such as a door-to-door survey, aerial survey, or consultation with local agricultural authorities.	12 months

BASES

This SLC is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the Radiological Environmental Monitoring Program given in the ODCM are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey, or from consulting with local agricultural authorities shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 m² 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 quantify (26 kg/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: (1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and (2) a vegetation yield of 2 kg/m².

BASES (continued)

With a Land Use Census identifying a location(s) which yield 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 SLC 16.11-13, 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, 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.

REFERENCES

1. Catawba Offsite Dose Calculation Manual.
2. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-15 Interlaboratory Comparison Program

COMMITMENT Analyses shall be performed on all radioactive materials, supplied as part of an Interlaboratory Comparison Program, that correspond to samples required by SLC 16.11-13.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Analyses not being performed as required.	A.1 Report corrective actions taken to prevent recurrence in the Annual Radiological Environmental Operating Report.	In the next scheduled Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-15-1 Report a summary of the results of the Interlaboratory Comparison Program in the Annual Radiological Environmental Operating Report.	In the Annual Radiological Environmental Operating Report pursuant to Technical Specification 5.6.2

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

BASES (continued)

The Interlaboratory Comparison Program shall be described in the Annual Radiological Environmental Operating Report.

REFERENCES 1. 10 CFR Part 50, Appendix I.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-16 Annual Radiological Environmental Operating Report and Radioactive Effluent Release Report

COMMITMENT Annual Radiological Environmental Operating Report

Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 15 of each year.

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

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 reports shall also include the following: a summary description of the Radiological Environmental Monitoring Program; at least two legible maps (one map shall cover stations near the SITE BOUNDARY, and a second map shall include the more distant stations) covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by SLC 16.11-15; discussion of all deviations from the sampling schedule of Table 16.11-13-1; and discussion of all analyses in which the LLD required by Table 16.11-13-3 was not achievable.

A single submittal may be made for the station.

(continued)

COMMITMENT (continued)

Radioactive Effluent Release Report

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

The Radioactive Effluent Release Report shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. (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.) 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 five-year average of representative onsite meteorological data shall be used in the gaseous effluent dose pathway calculations. Dispersion factors (X/Qs) and deposition factors (D/Qs) shall be generated using the computer code XOQDOQ (NUREG/CR-2919) which implements NRC Regulatory Guide 1.111. The meteorological conditions concurrent with the time of release shall be reviewed annually to determine if the five-year average values should be revised. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM.

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

The Radioactive Effluent Release Reports shall include the following information for each type of solid waste shipped offsite during the report period:

(continued)

COMMITMENT (continued)

- a. Total container volume, in cubic meters,
- b. Total Curie quantity (determined by measurement or estimate),
- c. Principal radionuclides (determined by measurement or estimate),
- d. Type of waste (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. Number of shipments, and
- f. Solidification agent or absorbent (e.g., cement or other approved agents (media)).

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.

The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PROCESS CONTROL PROGRAM (PCP) and to the ODCM, as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the Land Use Census pursuant to SLC 16.11-14.

A single submittal may be made for the station. The submittal should combine those sections that are common to both units.

APPLICABILITY: At all times.

REMEDIAL ACTIONS None

TESTING REQUIREMENTS None

BASES None

REFERENCES None

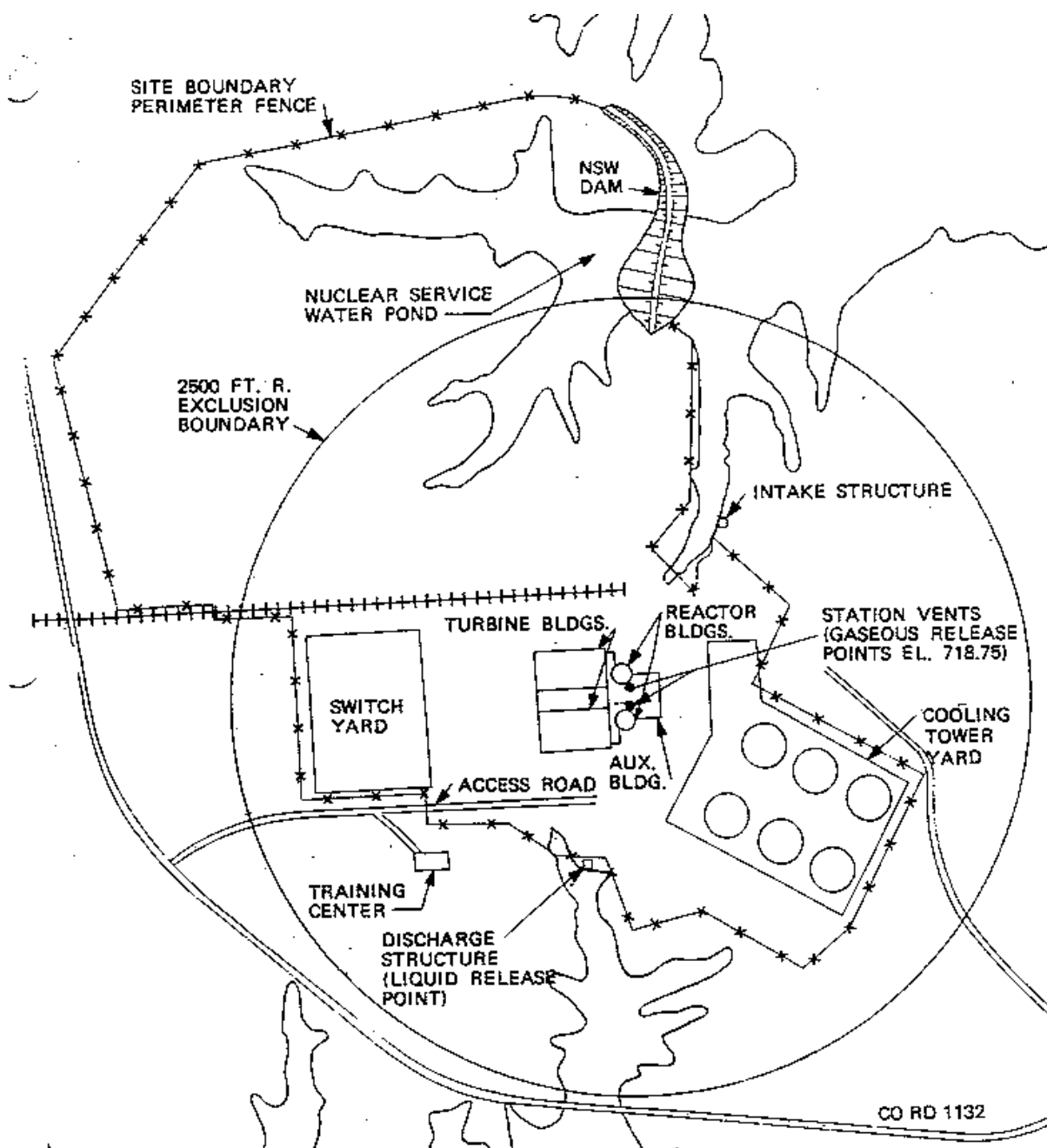


Figure 16.11-16-1

UNRESTRICTED AREA and SITE BOUNDARY for Radioactive Effluents

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-17 Liquid Holdup Tanks

COMMITMENT The quantity of radioactive material contained in each temporary unprotected outdoor tank shall be limited to ≤ 10 Curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Quantity of radioactive material in tank(s) exceeding limit.	A.1 Suspend all additions of radioactive material to the tank(s).	Immediately
	<u>AND</u>	
	A.2 Reduce tank(s) contents to within limit.	48 hours
	<u>AND</u>	
	A.3 Describe the events leading to this condition in the Radioactive Effluent Release Report.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-17-1 Verify that the quantity of radioactive material contained in each tank is within limits by analyzing a representative sample of the tank(s) contents when radioactive materials are being added to the tank(s).	7 days

BASES The tanks included in this SLC are all those outdoor radwaste tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting concentrations would be less than the limits of 10 CFR Part 20, Appendix B, Table II, Column 2, at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

- REFERENCES**
1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.
 2. Technical Specification 5.5.12, Explosive Gas and Storage Tank Radioactivity Monitoring Program.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-18 Explosive Gas Mixture

COMMITMENT The concentration of oxygen in the WASTE GAS HOLDUP SYSTEM shall be limited to $\leq 2\%$ by volume whenever the hydrogen concentration is $> 4\%$ by volume.

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Concentration of oxygen in the WASTE GAS HOLDUP SYSTEM $> 2\%$ but $\leq 4\%$ by volume and hydrogen concentration $> 4\%$ by volume.	A.1 Reduce oxygen concentration to within limits.	48 hours
B. Concentration of oxygen in the WASTE GAS HOLDUP SYSTEM $> 4\%$ by volume and hydrogen concentration $> 4\%$ by volume.	B.1 Suspend all additions of waste gases to the system.	Immediately
	<u>AND</u>	
	B.2 Reduce the concentration of oxygen to $\leq 4\%$ by volume.	Immediately
	<u>AND</u>	
	B.3 Reduce oxygen concentration to within limits.	48 hours

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-18-1 Verify that the concentrations of hydrogen and oxygen in the WASTE GAS HOLDUP SYSTEM are within limits by continuously monitoring the waste gases in the WASTE GAS HOLDUP SYSTEM with the hydrogen and oxygen monitors required FUNCTIONAL by SLC 16.11-20.	During WASTE GAS HOLDUP SYSTEM operation

BASES This SLC is provided to ensure that the concentration of potentially explosive gas mixtures contained in the WASTE GAS HOLDUP SYSTEM is maintained below the flammability limits of hydrogen and oxygen. Automatic control features are included in the system to prevent the hydrogen and oxygen concentrations from reaching these flammability limits. These automatic control features include isolation of the source of hydrogen and/or oxygen, automatic diversion to recombiners, or injection of dilutants to reduce the concentration below the flammability limits. Maintaining the concentration of hydrogen and oxygen below their flammability limits provides assurance that the releases of radioactive materials will be controlled in conformance with the requirements of General Design Criterion 60 of Appendix A to 10 CFR Part 50.

- REFERENCES**
1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.
 2. Technical Specification 5.5.12, Explosive Gas and Storage Tank Radioactivity Monitoring Program.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-19 Gas Storage Tanks

COMMITMENT The quantity of radioactivity contained in each gas storage tank shall be limited to $\leq 97,000$ Curies of noble gases (considered as Xe-133 equivalent).

APPLICABILITY: At all times.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Quantity of radioactive material in tank(s) exceeding limit.	A.1 Suspend all additions of radioactive material to the tank(s).	Immediately
	<u>AND</u>	
	A.2 Reduce tank(s) contents to within limit.	48 hours
	<u>AND</u>	
	A.3 Describe the events leading to this condition in the Radioactive Effluent Release Report.	In the next scheduled Radioactive Effluent Release Report pursuant to Technical Specification 5.6.3

TESTING REQUIREMENTS

TEST	FREQUENCY
TR 16.11-19-1 Verify that the quantity of radioactive material contained in each tank is within limits when radioactive materials are being added to the tank(s).	24 hours

BASES The tanks included in this SLC are those tanks for which the quantity of radioactivity contained is not limited directly or indirectly by another SLC. Restricting the quantity of radioactivity contained in each gas storage tank provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting whole body exposure to a MEMBER OF THE PUBLIC at the nearest SITE BOUNDARY will not exceed 0.5 rem. This is consistent with Standard Review Plan 11.3, Branch Technical Position ETSB 11-5, "Postulated Radioactive Releases Due to a Waste Gas System Leak or Failure," in NUREG-0800, July 1981.

- REFERENCES**
1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.
 2. Technical Specification 5.5.12, Explosive Gas and Storage Tank Radioactivity Monitoring Program.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-20 Explosive Gas Monitoring Instrumentation

COMMITMENT The Explosive Gas Monitoring Instrumentation channels shown in Table 16.11-20-1 shall be FUNCTIONAL with their Alarm/Trip Setpoints set to ensure that the limits of SLC 16.11-18 are not exceeded.

APPLICABILITY: During WASTE GAS HOLDUP SYSTEM operation.

REMEDIAL ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Explosive Gas Monitoring Instrumentation channel(s) Alarm/Trip Setpoint less conservative than required.	A.1 Declare the channel(s) non-functional.	Immediately
B. One required hydrogen monitor channel non-functional.	B.1 Suspend oxygen supply to the recombiner.	Immediately
	<u>AND</u> B.2 Restore channel to FUNCTIONAL status.	30 days
C. One required oxygen monitor channel non-functional.	C.1 Obtain and analyze grab samples.	24 hours
	<u>AND</u> C.2 Restore channel to FUNCTIONAL status.	30 days

(continued)

REMEDIAL ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two required oxygen monitor channels non-functional.	D.1 Obtain and analyze grab samples.	Once per 4 hours during degassing operations <u>AND</u> Once per 24 hours during other operations
	<u>AND</u> D.2 Restore channels to FUNCTIONAL status.	30 days
E. Required Action and associated Completion Time of Condition B, C, or D not met.	E.1 Prepare and submit a Special Report to the NRC to explain why the non-functionality was not corrected within the time specified.	30 days

TESTING REQUIREMENTS

-----NOTE-----
Refer to Table 16.11-20-1 to determine which TRs apply for each Explosive Gas Monitoring Instrumentation channel.

TEST	FREQUENCY
TR 16.11-20-1 Perform CHANNEL CHECK.	24 hours
TR 16.11-20-2 Perform COT.	31 days

(continued)

TESTING REQUIREMENTS (continued)

TEST	FREQUENCY
TR 16.11-20-3-----NOTE----- The CHANNEL CALIBRATION shall include the use of standard gas samples in accordance with the manufacturer's recommendations. In addition, a standard gas sample of nominal four volume percent hydrogen (for the hydrogen monitors), nominal four volume percent oxygen (for the oxygen monitors 0WGMT6540, 0WGMT6560, 0WGMT6160, and 0WGMT6161), and nominal three volume percent oxygen (for the oxygen monitors 0WGMT6550 and 0WGMT6570) with the balance nitrogen, shall be used in the calibration and/or to check linearity of the analyzers. ----- Perform CHANNEL CALIBRATION.	92 days

Table 16.11-20-1

Explosive Gas Monitoring Instrumentation

INSTRUMENT		REQUIRED CHANNELS	TESTING REQUIREMENTS
WASTE GAS HOLDUP SYSTEM Explosive Gas Monitoring Instrumentation			
1.	Hydrogen Monitors	1/in-service train per station	TR 16.11-20-1 TR 16.11-20-2 TR 16.11-20-3
2.	Oxygen Monitors	2/in-service train per station	TR 16.11-20-1 TR 16.11-20-2 TR 16.11-20-3

BASES The Explosive Gas Monitoring Instrumentation is provided for monitoring and controlling the concentrations of potentially explosive gas mixtures in the WASTE GAS HOLDUP SYSTEM.

If an instrument has alarm and trip capability, then both the alarm and the trip setpoints are required to be verified for the instrument to remain FUNCTIONAL. For instruments with alarm-only capability, the alarm setpoint must be verified for the instrument to remain FUNCTIONAL.

OWGMT6540, OWGMT6550, OWGMT6560, and OWGMT6570 provide both an alarm and a trip function. OWGMT6160 and OWGMT6161 provide an alarm-only function. The oxygen monitors for waste gas analyzers OWGMT6550 or OWGMT6570 can only be credited if oxygen concentration is <3.7% and if NO oxygen sources are present.

REFERENCES 1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.

16.11 RADIOLOGICAL EFFLUENTS CONTROLS

16.11-21 Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems

- COMMITMENT Licensee-initiated major changes to the Radwaste Treatment Systems (liquid, gaseous, and solid):
1. Shall be reported to the NRC in the Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the Station Manager. Licensees may choose to submit the information called for in this SLC as part of the periodic Updated Final Safety Analysis Report update. The discussion of each change 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 exposures to a MEMBER OF THE PUBLIC 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 prior to when the changes are to be made;
 - g. An estimate of the exposure to plant operating personnel as a result of the change; and

(continued)

COMMITMENT (continued)

- h. Documentation of the fact that the change was reviewed and found acceptable by the Station Manager or the Chemistry Manager.
2. Shall become effective upon review and acceptance by a qualified individual/organization.

APPLICABILITY: At all times.

REMEDIAL ACTIONS None

TESTING REQUIREMENTS None

BASES None

REFERENCES 1. Letter from NRC to Gary R. Peterson, Duke, Issuance of Improved Technical Specifications Amendments for Catawba, September 30, 1998.

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16.5-2	Deleted	
16.5-3	2	09/19/19
16.5-4	1	01/27/22
16.5-5	1	01/28/10
16.5-6	3	08/17/22
16.5-7	2	02/06/15
16.5-8	Deleted	
16.5-9	Deleted	03/02/21
16.5-10	Deleted	
16.6-1	0	10/09/02
16.6-2	Deleted	
16.6-3	2	01/27/22
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16.7-4	Deleted	
16.7-5	7	06/01/22

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16.7-8	2	08/21/09
16.7-9	15	08/17/22
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16.7-12	1	08/21/09
16.7-13	3	06/10/16
16.7-14	1	08/21/09
16.7-15	3	02/23/23
16.7-16	0	06/08/09
16.7-17	0	02/10/15
16.7-18	0	05/10/16
16.8-1	8	01/27/22
16.8-2	4	1/31/24
16.8-3	3	11/28/22
16.8-4	2	11/05/07
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16.9-12	3	02/10/15
16.9-13	4	09/27/16
16.9-14	1	09/25/06
16.9-15	2	08/21/09
16.9-16	2	08/21/09
16.9-17	0	10/09/02
16.9-18	Deleted	
16.9-19	3	02/20/12
16.9-20	0	10/09/02
16.9-21	1	10/13/16
16.9-22	3	08/17/22
16.9-23	5	08/03/17
16.9-24	2	10/24/06
16.9-25	2	08/21/09
16.9-26	1	11/15/18
16.10-1	1	08/21/09
16.10-2	1	10/24/06
16.10-3	1	08/21/09
16.10-4	0	08/04/20

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16.11-1	1	07/27/13
16.11-2	9	07/07/22
16.11-3	0	10/09/02
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16.11-5	0	10/09/02
16.11-6	3	08/03/15
16.11-7	14	05/03/22
16.11-8	0	10/09/02
16.11-9	0	10/09/02
16.11-10	1	08/21/09
16.11-11	1	03/20/03
16.11-12	0	10/09/02
16.11-13	1	07/27/13
16.11-14	0	10/09/02
16.11-15	0	10/09/02
16.11-16	1	10/24/11
16.11-17	0	10/09/02
16.11-18	1	08/21/09
16.11-19	0	10/09/02
16.11-20	3	11/21/19
16.11-21	0	10/09/02
16.12-1	0	10/09/02
16.13-1	1	08/03/17
16.13-2	Deleted	

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16.13-3	Deleted	
16.13-4	4	10/04/21

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16.5-5	1	01/28/10
16.5-6	3	08/17/22
16.5-7	2	02/06/15
16.5-8	Deleted	
16.5-9	Deleted	03/02/21
16.5-10	Deleted	
16.6-1	0	10/09/02
16.6-2	Deleted	
16.6-3	2	01/27/22
16.6-4	3	08/17/22
16.6-5	3	07/07/20
16.7-1	1	08/21/09
16.7-2	4	02/03/11
16.7-3	6	06/15/23
16.7-4	Deleted	
16.7-5	7	06/01/22

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16.7-9	15	08/17/22
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16.7-12	1	08/21/09
16.7-13	3	06/10/16
16.7-14	1	08/21/09
16.7-15	3	02/23/23
16.7-16	0	06/08/09
16.7-17	0	02/10/15
16.7-18	0	05/10/16
16.8-1	8	01/27/22
16.8-2	4	1/31/24
16.8-3	3	11/28/22
16.8-4	2	11/05/07
16.8-5	3	08/21/09
16.9-1	10	01/29/19
16.9-2	6	08/03/17
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16.9-10	5	08/21/09
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16.9-14	1	09/25/06
16.9-15	2	08/21/09
16.9-16	2	08/21/09
16.9-17	0	10/09/02
16.9-18	Deleted	
16.9-19	3	02/20/12
16.9-20	0	10/09/02
16.9-21	1	10/13/16
16.9-22	3	08/17/22
16.9-23	5	08/03/17
16.9-24	2	10/24/06
16.9-25	2	08/21/09
16.9-26	1	11/15/18
16.10-1	1	08/21/09
16.10-2	1	10/24/06
16.10-3	1	08/21/09
16.10-4	0	08/04/20

LIST OF EFFECTIVE SECTIONS

<u>SECTION</u>	<u>REVISION NUMBER</u>	<u>REVISION DATE</u>
16.10-5	2	09/07/22
16.11-1	1	07/27/13
16.11-2	9	07/07/22
16.11-3	0	10/09/02
16.11-4	1	08/21/09
16.11-5	0	10/09/02
16.11-6	3	08/03/15
16.11-7	15	03/12/24
16.11-8	0	10/09/02
16.11-9	0	10/09/02
16.11-10	1	08/21/09
16.11-11	1	03/20/03
16.11-12	0	10/09/02
16.11-13	1	07/27/13
16.11-14	0	10/09/02
16.11-15	0	10/09/02
16.11-16	1	10/24/11
16.11-17	0	10/09/02
16.11-18	1	08/21/09
16.11-19	0	10/09/02
16.11-20	3	11/21/19
16.11-21	0	10/09/02
16.12-1	0	10/09/02
16.13-1	1	08/03/17
16.13-2	Deleted	

LIST OF EFFECTIVE SECTIONS

<u>SECTION</u>	<u>REVISION NUMBER</u>	<u>REVISION DATE</u>
16.13-3	Deleted	
16.13-4	4	10/04/21