

April 24, 2006

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

**Subject            Docket Nos. 50-206, 50-361, 50-362 and 72-41  
                         2005 Annual Radiological Environmental Operating Report  
                         San Onofre Nuclear Generating Station Units 1, 2 and 3 and Independent  
                         Spent Fuel Storage Facility**

Dear Sir or Madam:

As required by Technical Specification (TS) Section D6.9.1.3 of San Onofre Nuclear Generating Station (SONGS) Unit 1 Facility Operating License DPR-13, and TS Section 5.7.1.2 of Facility Operating Licenses NPF-10 and NPF-15 for SONGS Units 2 and 3, respectively, this letter transmits the 2005 Annual Radiological Environmental Operating Report (AREOR) for SONGS Unit 1 and SONGS Units 2 and 3.

The AREOR covers the operation of SONGS Unit 1 and SONGS Units 2 and 3 during the calendar year 2005 and includes summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program. In addition, the AREOR includes the results for direct radiation monitoring near the Independent Spent Fuel Storage Installation.

If you require any additional information, please contact E.S. Medling at (949) 368-7492.

Sincerely,



Enclosure

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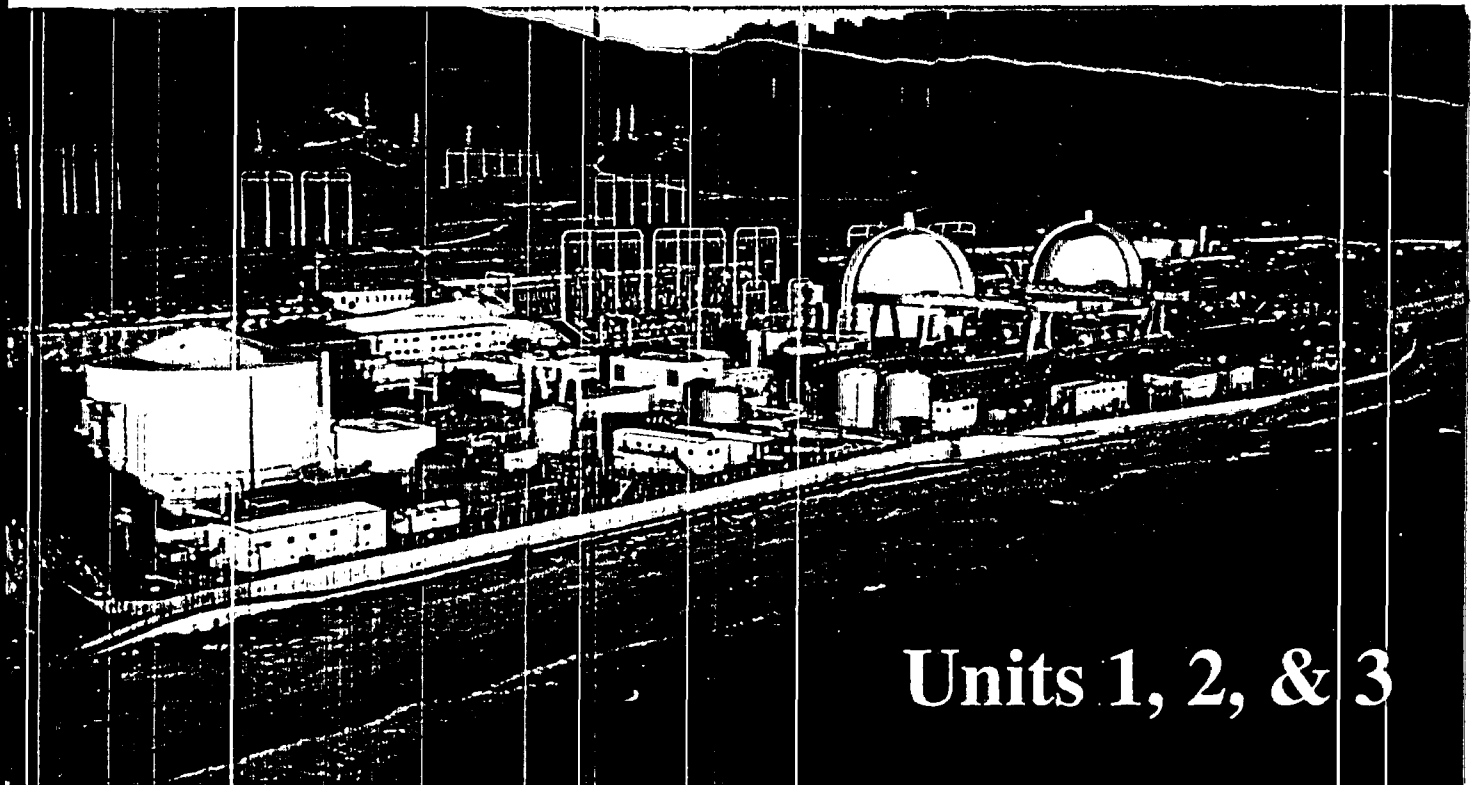
IEOS

# 2005

# Radiological Environmental

# Operating Report

## San Onofre Nuclear Generating Station



Units 1, 2, & 3

**Southern California Edison**  
*An Edison International Company*

Docket Nos. 50-206, 50-361, 50-362  
License Nos. DPR-13, NPF-10, NPF-15

**April 2006**


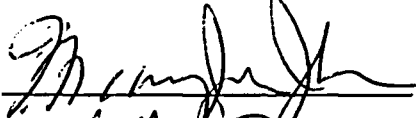


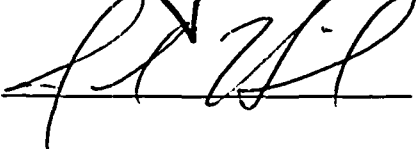
 SOUTHERN CALIFORNIA  
**EDISON**  
An EDISON INTERNATIONAL Company

2005 ANNUAL  
RADIOLOGICAL ENVIRONMENTAL  
OPERATING REPORT

San Onofre Nuclear Generating Station

UNITS 1, 2, & 3

Southern California Edison  
*An Edison International Company*

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## Executive Summary

The data from the San Onofre Nuclear Generating Station (SONGS) Radiological Environmental Monitoring Program (REMP) clearly indicate that SONGS had no measurable radiological environmental impact during 2005.

Preparation of the 2005 Annual Radiological Environmental Operating Report (AREOR) used the data reduction protocol described in NUREG/CR-4007. A meaningful analysis of data at, near, or below the detection limit must necessarily involve a consideration of the degrees of uncertainty associated with the data. Excluding naturally occurring radionuclides, approximately 5% of the 2005 SONGS REMP data set was above the critical level (1.64 sigma), which is characteristic of a database of values statistically equal to zero. The data have been summarized in the Statistical Summary of REMP Data found in Appendix B. The plant related radionuclides (Cs-137 in soil and sediment, as well as I-131 in kelp) detected above the *a posteriori* MDC may be attributable to fallout from nuclear weapons testing (Cs-137) and medical administrations of radionuclides (I-131). These isotopes have been detected at indicator as well as control locations in past years. The naturally occurring radionuclides (Be-7, K-40, and Th-228) detected were observed in both control and indicator locations at substantially similar concentrations and are not related to the operation of SONGS. The balance of 2005 SONGS REMP database displays behavior statistically equal to a null set. Refer to Appendix B for a more detailed discussion.

## INTRODUCTION

SONGS consists of three pressurized water nuclear reactors housed in separate containment buildings. Unit 1 attained initial criticality June 1967 and was permanently retired from service in November 1992. Units 2/3 attained initial criticality in July 1982 and August 1983, respectively, and have been in operation to date.

The purpose of the REMP is to quantify ambient radiation levels in the environs of SONGS, and to identify and quantify concentrations of radioactivity in various environmental media in the vicinity of SONGS which have a potential radiation exposure pathway to man.

Thermoluminescent dosimeters (TLDs) were used to measure direct radiation levels. Sampled environmental media include soil, shoreline sediment (beach sand), air (particulate & iodine), local crops, non-migratory marine species, kelp, drinking water, ocean water, and ocean bottom sediments. Each of the samples was analyzed for both naturally-occurring and SONGS-related radionuclides.

The REMP is conducted in accordance with Section 5.0 of the SONGS Unit 1 and Units 2/3 Offsite Dose Calculation Manuals (ODCM).

To conform with 10CFR Part 50, Appendix I, Section IV-B.2, measured radioactivity concentrations in the environmental samples have been compared against predicted (calculated) ones to evaluate the relationship between quantities of radioactive material released in effluents and resultant radiation doses to individuals from principal pathways of exposure.

This comparison was documented in Appendix D of the 1993 AREOR, issued April, 1994.



A land use census was performed in 2005 to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census. Appendix F of the report identifies changes to the census and the resultant dose increase, if any, to individuals from principal pathways of exposures in conformance with 10CFR Part 50, Appendix I, Section IV. B.3.

### **OBJECTIVES**

1. To fulfill the radiological environmental monitoring requirements of the ODCM and the Technical Specifications.
2. To detect any significant increase in the concentration of radionuclides in critical pathways.
3. To detect any significant change in ambient gamma radiation levels.
4. To verify that the operation of SONGS Units 1, 2 and 3 have no measurable (detrimental) effects on the health and safety of the public or the environment.

### **SAMPLE COLLECTION**

Samples of various environmental media were obtained to meet the stated objectives. The selection of sample types was based on established critical pathways for the transfer of radionuclides through the environment to individuals, and the evaluation of data during the operational phase. Sampling locations were determined with consideration given to site meteorology, local demography, and land uses. Refer to Appendix A for a complete list of REMP sample locations as described in Table 5-4 of the ODCM.

Sampling locations were divided into two classes, indicator and control. Control stations were at locations considered to be unaffected by SONGS operations. All others are considered indicator locations and may be potentially affected by SONGS operations.

### **SOURCES OF RADIOACTIVITY**

Plant-specific radionuclides are produced in the normal operation of a nuclear power plant. Most of the fission products are retained within the fuel and its cladding. A small fraction of fission products such as cesium-137 (Cs-137) and iodine-131 (I-131), and activation products such as cobalt-60 (Co-60), are present in the primary reactor cooling system. Noble gases are also produced during the fission process.

Radioactive liquid and gaseous waste releases to the ocean and the atmosphere may contain very minute concentrations of plant-produced radionuclides. The airborne radioactive noble gases released are mostly xenon and krypton, which are inert (non-reactive). They do not concentrate in the body, but they may contribute to human radiation exposure as an immersion source for whole body exposure. Xenon-133 and argon-41 are the major radioactive noble gases released to the atmosphere, and their calculated offsite beta and gamma air doses are no greater than 0.1 mrad per year.

The releases of iodines and particulates in the gaseous and liquid effluents are small. The major radionuclides of interest are I-131, Cs-134, Cs-137, Co-58, and Co-60. The total releases for these radionuclides were well below applicable regulatory limits.

Tritium (H-3), the radioactive isotope of hydrogen, is the predominant radionuclide in the liquid effluents and is also present in gaseous effluents. Tritium is produced in the reactor water (coolant) as a result of boron activation and other nuclear reactions.

### **EXPOSURE PATHWAY**

Figure 1 illustrates various exposure pathways resulting in radiation dose to the surrounding population from operation of a nuclear facility. Only a few pathways will have real dose potential and require detailed calculations.

a. **External Exposure**

External exposure to people during normal operations will include radioactive gases in gaseous effluent plumes, radionuclides deposited on soil, and vegetation, or shoreline sediments. Direct exposure from radionuclides in water during recreation or commercial fishing activity is insignificant. Accumulation in sediments has the greater potential as a source of exposure. Gamma dosimeters (TLDs) are the usual means of measuring direct radiation exposure since significant dose contributors are gamma-emitters.

b. **Internal Exposure**

The release of radioactivity in liquid effluents involves pathways such as fish consumption and direct exposure from the ocean water by swimming and the shoreline activities. Consumption of fish or crops from the area receiving liquid effluents and breathing noble gases from the gaseous effluents releases are the most probable sources of internal exposure.

The doses calculated from gaseous effluent, tritium, radioiodines, and particulates in the gaseous effluent within a five-mile distance from the plant were summarized in Appendix D of the 1993 AREOR. Refer to the 1993 AREOR for detailed information on this analysis.

### **REGULATORY LIMITS, GUIDANCE, AND REQUIREMENTS**

\* **10CFR50**

The Code of Federal Regulations Title 10, Part 50, Appendix I.

\* **40CFR190**

The Environmental Protection Agency (EPA) has established environmental radiation protection standards for nuclear power plants in 40CFR190. The standards for normal

operation recommended that the dose from all discharges of radioactivity should not exceed 25 mrem/yr. These limits are applicable to the sum of both liquid and gaseous effluents and direct radiation. The environmental doses calculated at SONGS are a small fraction of the dose limits established by the EPA.

\* 10CFR20

10CFR20, Appendix B, Table II, "Effluent Concentrations" and Appendix C, "Concentration for Release to Sewerage"

**Guidance:**

\* Regulatory Guide 4.1

Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants, 1975

\* Regulatory Guide 4.2

Preparation of Environmental Reports for Nuclear Power Stations, 1976

\* Regulatory Guide 4.8

Environmental Technical Specifications for Nuclear Power Plants, 1975

\* Regulatory Guide 4.13

Performance, Testing, and Procedural Specification for Thermoluminescent Dosimetry: Environmental Applications, 1977

\* NUREG-0133

Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants

\* Regulatory Guide 1.109

Calculation of Annual Doses to Man from Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10CFR Part 50, Appendix I, 1977

\* NUREG-1301

Offsite Dose Calculations Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors, Generic Letter 89-01, Supplement No. 1, 1991

\* ANSI N545 (TLD's)

American National Standard Performance, Testing, And Procedural Specifications for Thermoluminescence Dosimetry (Environmental Application), 1975

\* Regulatory Guide 4.15

Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment, 1979

- \* NUREG/CR-4007 Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements, 1984

## DATA MANAGEMENT

The tabulated means, ranges and standard deviations presented in Appendix B were calculated following the standard format specified in Regulatory Guide 4.8, the Radiological Assessment Branch Technical Position, Revision 1, 1979, and in accordance with the protocol outlined in NUREG/CR-4007. A custom data management software package was used to perform the statistical analysis and tabulation of the data.

The REMP data are reviewed for accuracy and comparison against NRC reporting levels, and then entered into the REMP database. One of the REMP menu flags measurements exceeding the administrative levels (10% of the NRC reporting levels) established by Southern California Edison (SCE). The *a posteriori* minimum detectable concentration (MDC) is compared to the maximum value for the *a priori* Lower Limit of Detection (LLD) specified in the ODCM. This ensures that regulatory limits for the maximum LLD are met.

The impact of SONGS on the surrounding environment was assessed through a series of analyses. These analyses included: data reduction, comparisons of indicator to control locations, and summary (Appendix B); comparison of operational to preoperational environmental data (Appendix D); summary of deviations from sampling requirements and corrective actions taken (Appendix E); and the results of the 2005 Land Use Census (Appendix F).

All Radiological Environmental Monitoring activities for San Onofre are assessed in accordance with Quality Assurance requirements as defined in Regulatory Guide 4.15. The Contracted Environmental Analysis Laboratory (CEAL) participated in an interlaboratory comparison program in partial fulfillment of the quality assurance requirements for environmental monitoring. The CEAL participated in cross check programs which meet the intent of Reg. Guide 4.15. Refer to Appendix C.

## DETECTION LIMIT TERMINOLOGY

This report utilizes three distinct terms to describe the concept of “lower limit of detection” at various detection confidence levels. The terms are briefly defined below. For a more thorough discussion, the reader should refer to NUREG/CR-4007.

Critical level - Defined as 1.64 sigma. For a sufficiently large database of [isotopically analyzed] sample results, with the “true” activity being equal to zero, approximately 5% of the results should be above the critical level.

Lower Limit of Detection (LLD) - The LLD is the *a priori* (before the fact) lower limit of detection. This value is calculated for each isotope and every matrix based on typical or expected values of decay time, sample size, counter efficiency, etc. These values are listed in the ODCM and represent the maximum permissible value for the “lower limit of detection” for specified sample media.

Minimum Detectable Concentration (MDC) - The MDC is the *a posteriori* (after the fact) lower limit of detection based on actual decay time, measured sample size, counter efficiency as determined by recent calibration, etc. The MDC is compared to the LLD to verify that the measurement met the ODCM requirements for the maximum value of the LLD for the listed analytes. Values above the MDC are presumed to represent “detected” activity at the 95% detection confidence level.

The 2005 SONGS REMP data required by the ODCM have been summarized in the Statistical Summary of REMP Data found in Appendix B.

## CONCLUSION

Levels of radioactivity in environmental media are a function of several factors including: site release rates; meteorology; number, location, size and date of nuclear weapons tests; seasonal variability of fallout; soil conditions; local terrain and variability in the natural environment.

Radiological environmental data collected throughout 2005 have been evaluated to determine the impact, if any, of San Onofre operations on the surrounding environment. To accomplish this, several methods of evaluation were employed, namely:

1. Compilation and verification of all data, as well as a determination of those data considered to be significantly greater than background levels.
2. Environmental dose calculations and correlation of effluent releases with environmental concentrations (Refer to the 1993 AREOR).
3. Examination of time-dependent variations of pertinent radioisotopes in selected environmental media throughout the year at both indicator and control locations.
4. Comparison of radioactivity in various media in 2005 against the levels observed in pre-operational years.
5. Historical trending of radionuclides in various media during operational years.

In comparing these findings to the conservatively-defined limits of the facility operating licenses, it is concluded that the radiological environmental impact of the operation of SONGS through 2005 has been negligible, and the resulting dose to man is negligible.

## REFERENCES

1. 10CFR20, 10CFR50
2. 1993 Radiological Environmental Operating Report for San Onofre Nuclear Generating Station, April 30, 1994.
3. Land Use Census for SONGS Units 1, 2 and 3 Radiological Environmental Monitoring Program, October 2005.
4. ODCM (Offsite Dose Calculation Manual) for SONGS Unit 1 and Units 2/3, Section 5.0, 2005.
5. SONGS Radiological Monitoring (RM) Procedures: SO123-RM-1 (SO123-IX-1.10).
6. L. Currie. 1968 "Limits for the Qualitative Detection and Quantitative Determination - Application to Radiochemistry," Analytical Chemistry, vol. 40 pp. 586-593

**APPENDIX A**  
**SAMPLE TYPE AND SAMPLING LOCATION**



TABLE A-1

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE LOCATIONS

TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers are due to program modifications)	DISTANCE* (miles)	DIRECTION* (Sector)
<i>Direct Radiation</i>		
1 City of San Clemente (Former SDG&E Offices)	5.7	NW
2 Camp San Mateo – MCB	3.5	N
3 Camp San Onofre – MCB	2.6	NE
4 Camp Horno – MCB	4.5	E
6 Old Route 101 (East-Southeast)	3.0	ESE
8 Noncommissioned Officers' Beach Club	1.4	NW
10 Bluff (Adjacent to PIC #1)	0.7	WNW
11 Former Visitors' Center	0.4 **	NW
12 South Edge of Switchyard	0.2 **	E
13 Southeast Site Boundary (Bluff)	0.4 **	ESE
15 Southeast Site Boundary (Office Building)	0.1 **	SSE
16 East Southeast Site Boundary	0.4 **	ESE
19 San Clemente Highlands	5.0	NNW
22 Former US Coast Guard Station - San Mateo Point	2.7	WNW
23 SDG&E Service Center Yard	8.1	NW
31 Aurora Park - Mission Viejo (CONTROL)	18.6	NNW
33 Camp Talega – MCB	5.7	N
34 San Onofre School – MCB	1.9	NW
35 Range 312 – MCB	4.7	NNE
36 Range 208C – MCB	4.2	NE
38 San Onofre State Beach Park	3.3	SE
40 SCE Training Center - Mesa (Adjacent to PIC #3)	0.7	NNW
41 Old Route 101 – East	0.3 **	E
44 Fallbrook Fire Station	17.7	E

\* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

\*\* Distances are within the Units 2/3 CAB/EAB (Controlled Area Boundary/Exclusion Area Boundary)

\*\*\* Seil samples are not required by Technical Specifications.

\*\*\*\* Kelp samples are not required by Technical Specifications.

MCB Marine Corp Base Camp Pendleton

PIC Pressurized Ion Chamber

TABLE A-1

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE LOCATIONS

TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers are due to program modifications)	DISTANCE* (miles)	DIRECTION* (Sector)
<i>Direct Radiation</i> (Continued)		
46 San Onofre State Beach Park	0.9	SE
47 Camp Las Flores – MCB	8.6	SE
49 Camp Chappo – MCB	12.8	ESE
50 Oceanside Fire Station (CONTROL)	15.6	SE
53 San Diego County Operations Center	44.3	SE
54 Escondido Fire Station	31.8	ESE
55 San Onofre State Beach (U1 West)	0.2 **	W
56 San Onofre State Beach (U1 West)	0.2 **	W
57 San Onofre State Beach (Unit 2)	0.1 **	WSW
58 San Onofre State Beach (Unit 3)	0.1 **	S
59 SONGS Meteorological Tower	0.3 **	WNW
61 Mesa - East Boundary (Adjacent to PIC #4)	0.7	N
62 MCB - Camp Pendleton (Adjacent to PIC #5)	0.6	NNE
63 MCB - Camp Pendleton (Adjacent to PIC #6)	0.6	NE
64 MCB - Camp Pendleton (Adjacent to PIC #7)	0.6	ENE
65 MCB - Camp Pendleton (Adjacent to PIC #8)	0.7	E
66 San Onofre State Beach (Adjacent to PIC #9)	0.6	ESE
67 Former SONGS Evaporation Pond (Adjacent to PIC #2)	0.6	NW
68 Range 210C – MCB	4.3	ENE
73 South Yard Facility	0.4 **	ESE
74 Oceanside City Hall (Backup CONTROL)	15.6	SE
75 Gate 25 MCB	4.6	SE
76 El Camino Real Mobil Station	4.6	NW
77 Area 62 Heavy Lift Pad	4.3	N
78 Sheep Valley	4.4	ESE

\* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

\*\* Distances are within the Units 2/3 CAB/EAB (Controlled Area Boundary/Exclusion Area Boundary)

\*\*\* Soil samples are not required by Technical Specifications.

\*\*\*\* Kelp samples are not required by Technical Specifications.

MCB Marine Corp Base Camp Pendleton

PIC Pressurized Ion Chamber

TABLE A-1

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE LOCATIONS

TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers are due to program modifications)	DISTANCE* (miles)	DIRECTION* (Sector)
<i>Airborne</i>		
1 City of San Clemente (City Hall)	5.1	NW
7 AWS Roof	0.18 **	NW
9 State Beach Park	0.6	ESE
10 Bluff	0.7	WNW
11 Mesa EOF	0.7	NNW
12 Former SONGS Evaporation Pond	0.6	NW
13 Marine Corp Base (Camp Pendleton East)	0.7	E
14 Mesa Medical Facility	0.7	NNW
15 Oceanside City Hall (CONTROL)	15.6	SE
<i>Soil Samples ***</i>		
1 Camp San Onofre	2.6	NE
2 Old Route 101 - East Southeast	3.0	ESE
3 Basilone Road / I-5 Freeway Off ramp	2.0	NW
5 Former Visitor's Center	0.4 **	NW
6 Oceanside (CONTROL)	16.0	SE

\* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

\*\* Distances are within the Units 2/3 CAB/EAB (Controlled Area Boundary/Exclusion Area Boundary)

\*\*\* Soil samples are not required by Technical Specifications.

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PIC Pressurized Ion Chamber

TABLE A-1

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE LOCATIONS

TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers are due to program modifications)	DISTANCE* (miles)	DIRECTION* (Sector)
<i><b>Ocean Water</b></i>		
A Station Discharge Outfall - Unit 1	0.6	SW
B Outfall - Unit 2	1.5	SW
C Outfall - Unit 3	1.2	SSW
D Newport Beach (CONTROL)	30.0	NW
51 Unit 2 Conduit	0.1	SW
52 Unit 3 Conduit	0.1	SSW
<i><b>Drinking Water</b></i>		
4 Camp Pendleton Drinking Water Reservoir	2.2	NNW
5 Oceanside City Hall (CONTROL)	15.6	SE
<i><b>Shoreline Sediment (Beach Sand)</b></i>		
1 San Onofre State Beach (SE)	0.6	SE
2 San Onofre Surfing Beach	0.8	WNW
3 San Onofre State Beach (SE)	3.5	SE
4 Newport Beach North End (CONTROL)	29.2	NW
<i><b>Local Crops</b></i>		
1 San Clemente Ranch (San Mateo Canyon)	2.6	NW
2 Oceanside (CONTROL)	15-25	SE to ESE
4 San Clemente Residence (Ola Vista) with Garden	4.4	NW
6 SONGS Garden	0.4	NNW
<i><b>Non-Migratory Marine Animals</b></i>		
A Unit 1 Outfall	0.9	WSW
B Units 2/3 Outfall	1.5	SSW
C Laguna Beach (CONTROL)	18.2	NW

\* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

\*\*\* Soil samples are not required by Technical Specifications.

\*\*\*\* Kelp samples are not required by Technical Specifications.

MCB Marine Corp Base Camp Pendleton

PIC Pressurized Ion Chamber

TABLE A-1

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE LOCATIONS

TYPE OF SAMPLE AND SAMPLING LOCATION (Out of sequence sample numbers are due to program modifications)		DISTANCE* (miles)	DIRECTION* (Sector)
<i>Kelp ****:</i>			
A	San Onofre Kelp Bed	1.5	S
B	San Mateo Kelp Bed	3.8	WNW
C	Barn Kelp Bed	6.3	SSE
E	Salt Creek (CONTROL)	11 to 13	WNW to NW
<i>Ocean Bottom Sediments</i>			
B	Unit 1 Outfall (0.6 mile West)	0.8	SSW
C	Unit 2 Outfall	1.6	SW
D	Unit 3 Outfall	1.2	SSW
E	Laguna Beach (CONTROL)	18.2	NW
F	SONGS Upcoast	0.9	WSW
51	Unit 2 Conduit	0.1	SW
52	Unit 3 Conduit	0.1	SSW

\* Distance (miles) and Direction (sector) are measured relative to Units 2/3 midpoint. Direction determined from degrees true north.

\*\*\* Soil samples are not required by Technical Specifications.

\*\*\*\* Kelp samples are not required by Technical Specifications.

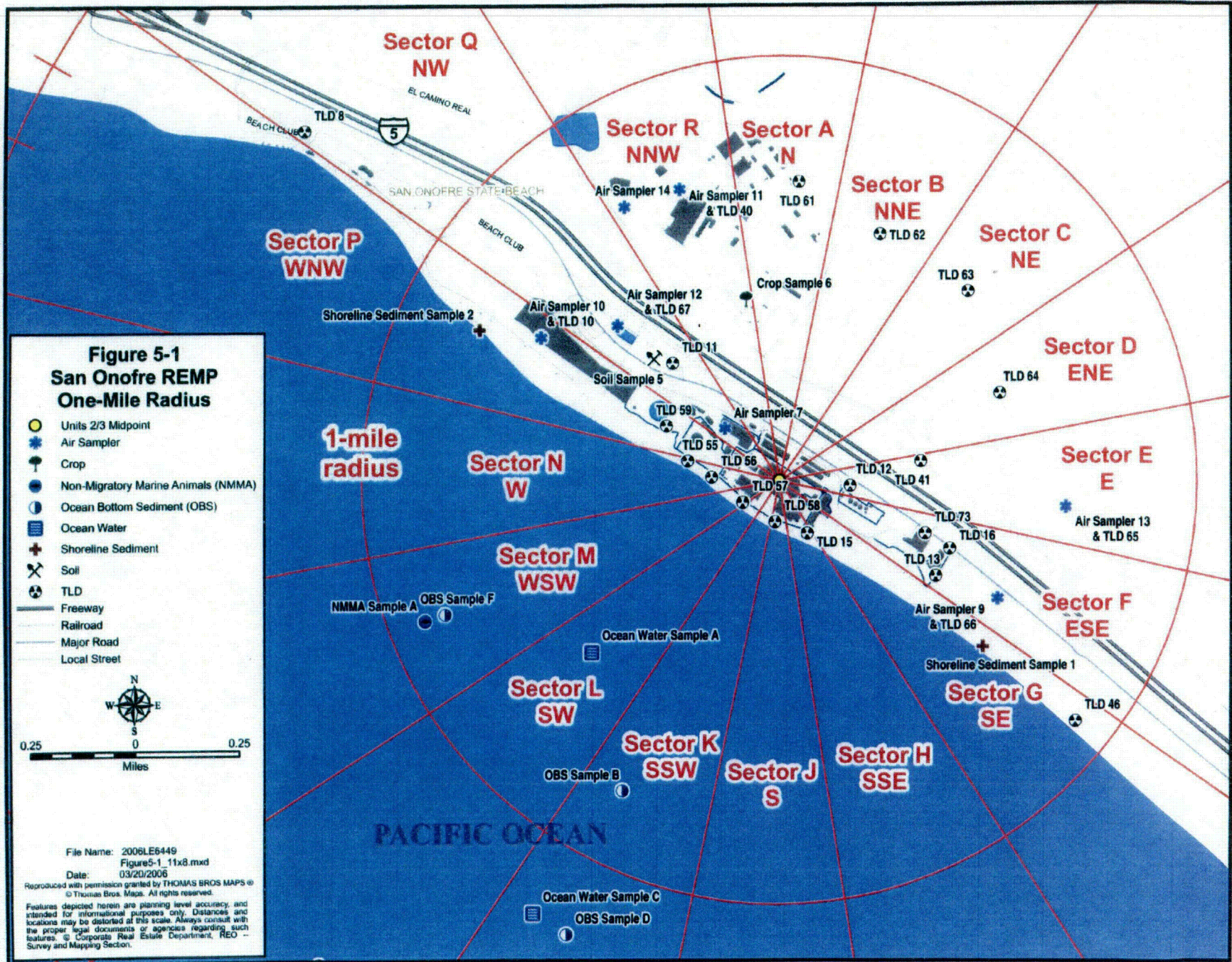
MCB Marine Corp Base Camp Pendleton

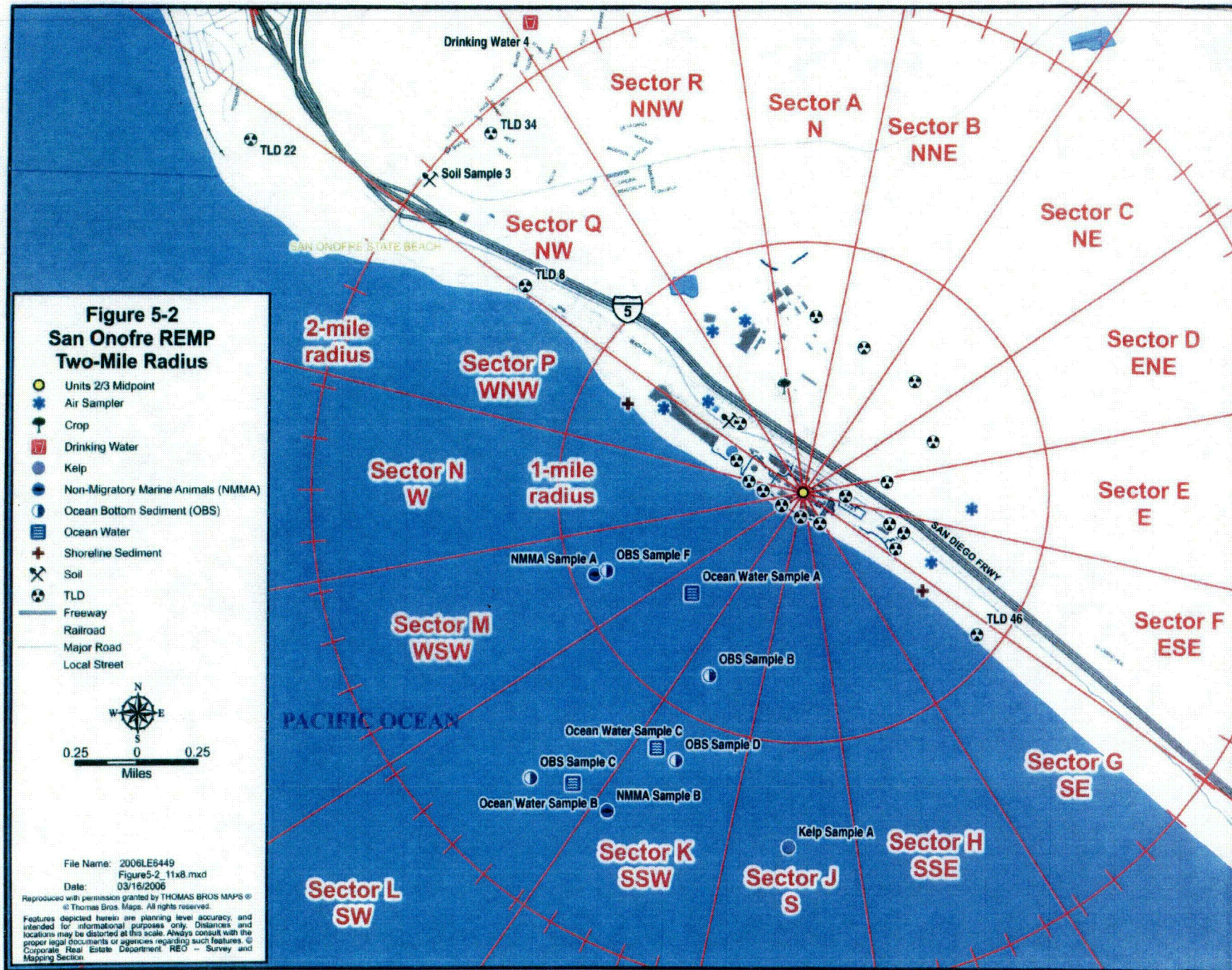
PIC Pressurized Ion Chamber

TABLE A-2

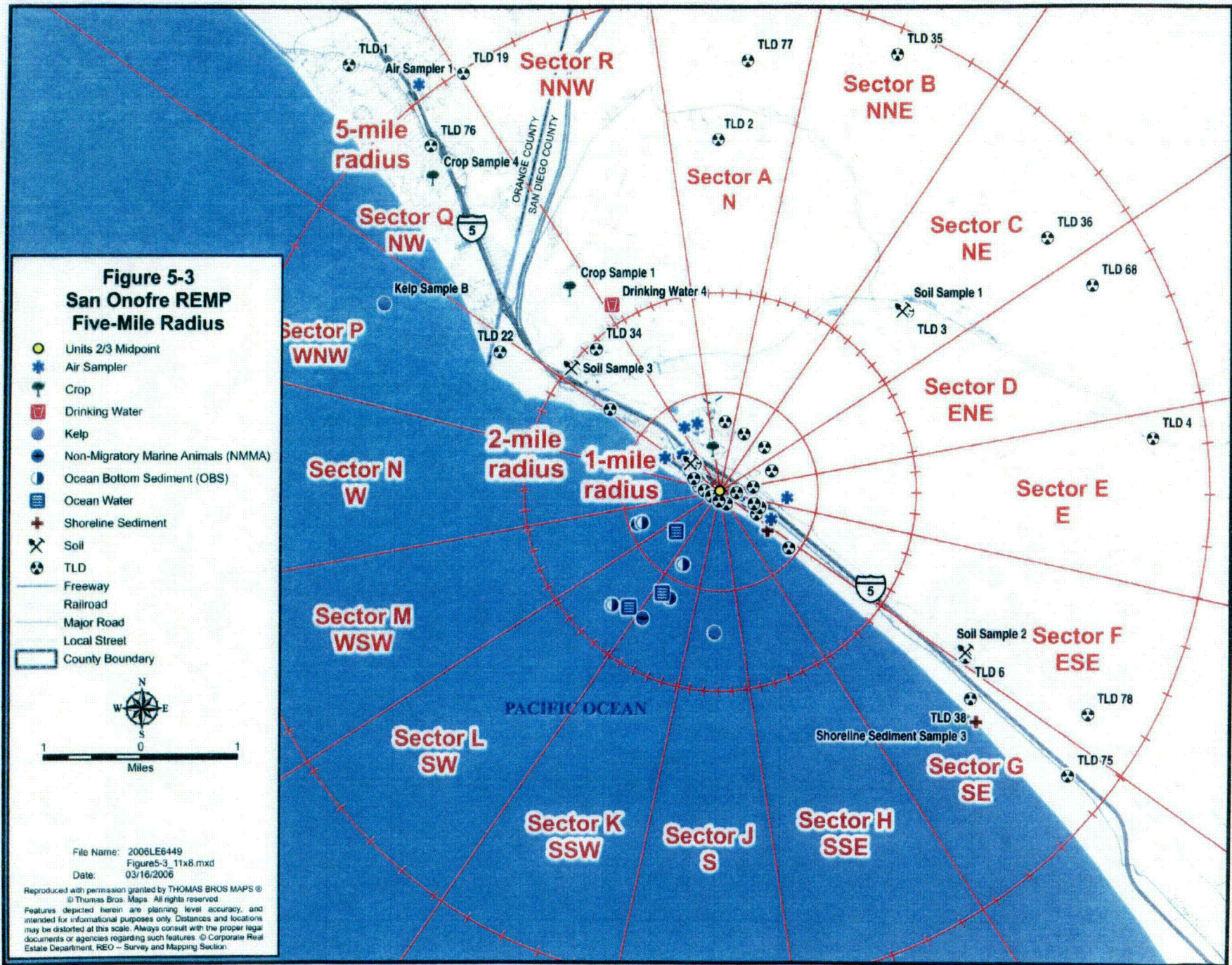
SECTOR AND DIRECTION DESIGNATION FOR REMP SAMPLE LOCATION MAP

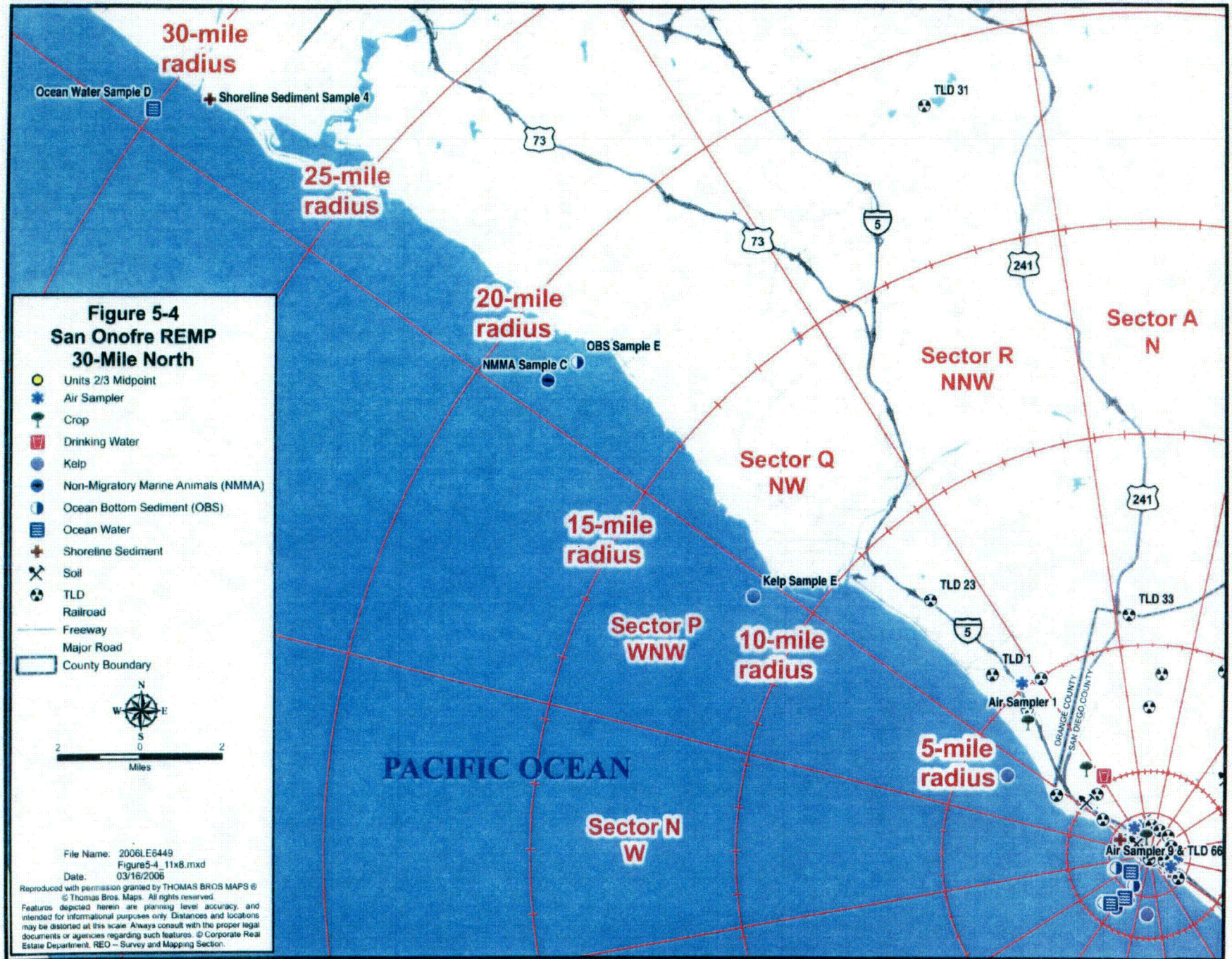
DEGREES TRUE NORTH FROM SONGS 2 AND 3 MIDPOINT			NOMENCLATURE	
<u>Sector Limit</u>	<u>Center Line</u>	<u>Sector Limit</u>	<u>22.5° Sector</u>	<u>Direction</u>
348.75	0 & 360	11.25	A	N
11.25	22.5	33.75	B	NNE
33.75	45.0	56.25	C	NE
56.25	67.5	78.75	D	ENE
78.75	90.0	101.25	E	E
101.25	112.0	123.75	F	ESE
123.75	135.0	146.25	G	SE
146.25	157.0	168.75	H	SSE
168.75	180.0	191.25	J	S
191.25	202.5	213.75	K	SSW
213.75	225.0	236.25	L	SW
236.25	247.5	258.75	M	WSW
258.75	270.0	281.25	N	W
281.25	292.5	303.75	P	WNW
303.75	315.0	326.25	Q	NW
326.25	337.5	348.75	R	NNW



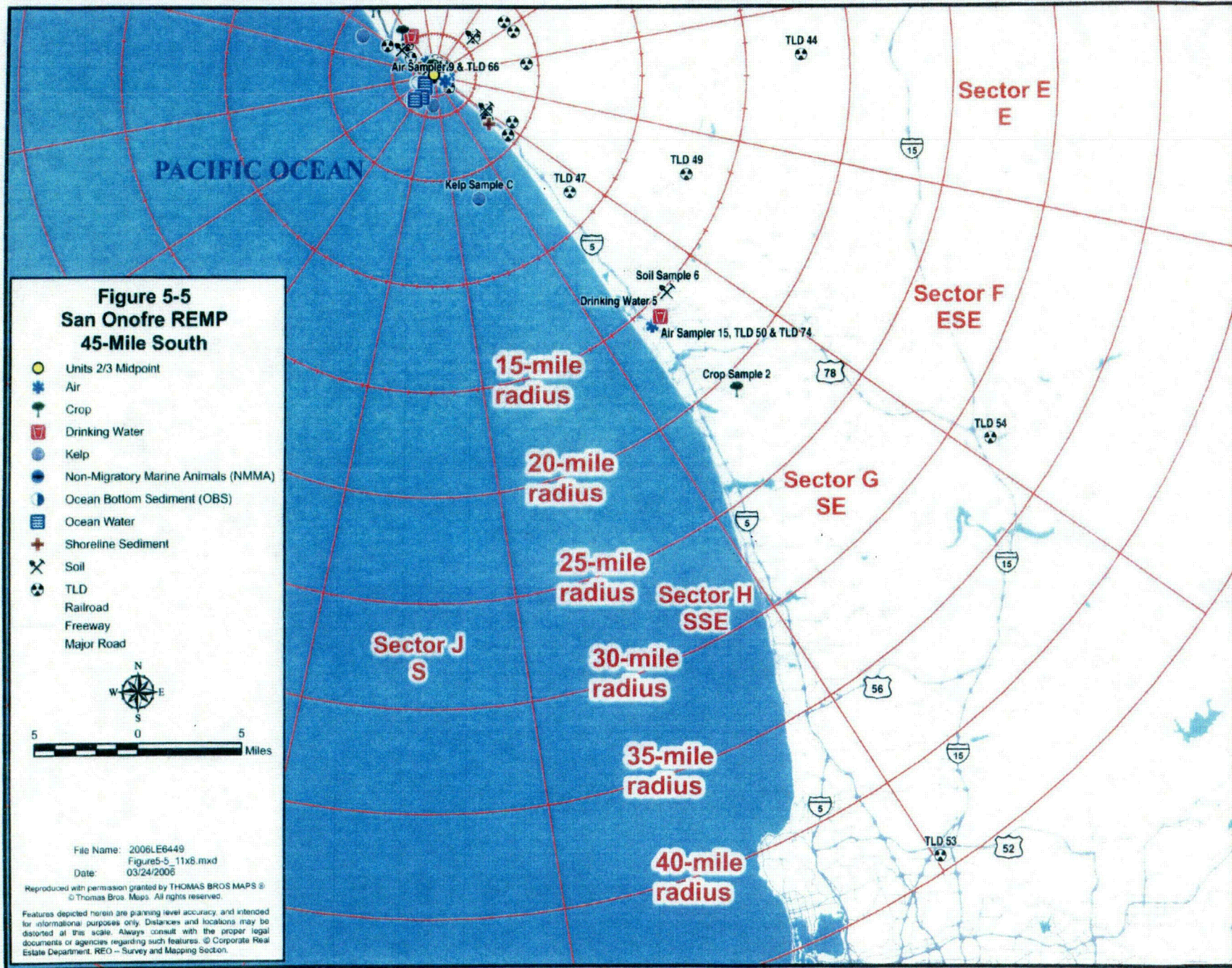






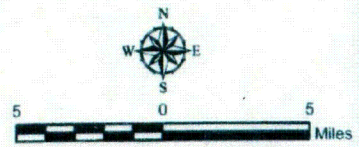


CO4



**Figure 5-5  
San Onofre REMP  
45-Mile South**

- Units 2/3 Midpoint
- Air
- Crop
- Drinking Water
- Kelp
- Non-Migratory Marine Animals (NMMA)
- Ocean Bottom Sediment (OBS)
- Ocean Water
- Shoreline Sediment
- Soil
- TLD
- Railroad
- Freeway
- Major Road



File Name: 2006LE6449  
Figure5-5\_11x8.mxd  
Date: 03/24/2008

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**APPENDIX B**  
**SUMMARY, RESULTS, AND DISCUSSIONS**  
**OF 2005 ENVIRONMENTAL DATA**

## SUMMARY

To assess the changes or trends in the radioactivity level in the environment over the past year, the data from January 2005 to December 2005 were evaluated. The 2005 REMP data were evaluated according to the criteria described in NUREG/CR-4007 and with the methodology described by Currie (1968).\* The REMP data above the critical level (1.64 times one sigma) for selected radionuclides, were reduced and tabulated in the Statistical Summary of REMP Data in accordance with the format specified in Reg. Guide 4.8. It should be noted that in an ideal database with the "true" value of each data point equal to zero, five (5)% of the values should be expected to be above the critical level. Excluding natural radionuclides (Be-7, K-40 and Th-228), approximately (5%) of the data listed in the Statistical Summary of REMP Data are above the critical level. Thus the 2005 SONGS REMP database, when examined in accordance with the Currie data reduction protocol, leads to the conclusion that SONGS had no statistically significant radiological environmental impact. A summary of the type and number of REMP samples obtained in 2005 appears in Table B-2.

As noted above, the SONGS REMP data base behaves substantially similar to a data base with values statistically indistinguishable from zero for station related isotopes. The exceptions, summarized in Table B-1, include eight (8) isotopically analyzed samples with station related activity reported above the *a posteriori* MDC. All sample values were significantly less than the NRC reporting levels. I-131 was detected in kelp and Cs-137 was detected in soil and ocean bottom sediment. These radionuclides have been detected in CONTROL as well as indicator locations in previous years. Cs-137 is commonly detected in environmental sediment samples because of fallout from weapons testing. Cs-137 has been intermittently detected in the indicator and in the CONTROL soil samples in past years and no correlation between Cs-137 level in soil and proximity to the plant has been observed. The data strongly suggest that the low level Cs-137 in certain sediment samples is due to fallout and is not due to the operation of SONGS. The low level Cs-137 detected in one ocean bottom sediment sample may be attributed to the operation of SONGS, but it is also consistent with Cs-137 levels in sediment attributable to nuclear weapons fallout. I-131 is a medically administered radionuclide which is often detected in sewage plant outfalls, including those routed to the Pacific Ocean. I-131 has been detected in CONTROL and indicator kelp samples, suggesting that the source of the I-131 is external to SONGS. See Table B-1 for data. We conclude that SONGS had a negligible radiological environmental impact during 2005.

Historical trending of data near and below the detection limits is necessarily limited. The concentration of radionuclides in the environs of SONGS has trended downward since the early to mid 1980s. In the past three years only a few REMP analysis results have been above the detection limit. These isotopes are detected in CONTROL as well as indicator locations and there are known sources for these radionuclides external to SONGS. The overall trend of the REMP data at SONGS is *de minimis* levels of anthropogenic radioactivity with occasional samples showing radioactivity above the *a posteriori* MDC.

\* L. Currie. 1968 "Limits for the Qualitative Detection and Quantitative Determination - Application to Radiochemistry," Analytical Chemistry, vol. 40 pp. 586-593

## RESULTS AND DISCUSSIONS OF 2005 ENVIRONMENTAL DATA

### A. *Direct Radiation*

The purpose of this program element was to measure the quarterly environmental gamma radiation in the vicinity of SONGS. To accomplish this task, calcium sulfate ( $\text{CaSO}_4$ ) thermoluminescent dosimeters (TLDs) were placed at a minimum of 30 indicator and CONTROL locations. They were collected and analyzed quarterly in accordance with ANSI-N545 standards. TLDs within five miles of SONGS were considered indicator locations. TLDs located greater than five miles from SONGS were considered CONTROL locations. The indicator locations are selected as inner and outer rings for all three Units as required by Unit 1 and Units 2/3 Offsite Dose Calculation Manuals (ODCMs). Additional TLDs are placed at locations of interest such as schools and hospitals.

Six laboratory CONTROL TLDs were analyzed quarterly. TLD numbers 17, 18, and 60 are used for background dose normalization. TLDs #A and #B are used to compensate for transit dose. A fader TLD is used to compensate for the time and temperature dependent "fade" associated with this type of dosimeter.

After the samples were analyzed, the measured doses were corrected for pre and post field exposure times. The average routine indicator location dose was 17.19 mR with a range of 10.13 to 29.32 mR. The average CONTROL location dose was 16.12 mR with a range of 12.96 to 20.05 mR. The routine 2005 REMP TLD data has been grouped into four categories based on distance from SONGS for the purposes of trending any correlation between distance from SONGS and total annual dose.

#### 2005 REMP TLD data (Average Dose vs. Distance from SONGS) Average Quarterly Dose in mR

TLDs $\leq 0.5$ miles from SONGS	19.70
TLDs $> 0.5$ miles AND $\leq 1.0$ mile from SONGS	15.22
TLDs $> 1.0$ mile AND $\leq 5.0$ miles from SONGS	16.55
TLDs $> 5$ miles from SONGS (CONTROL TLDs)	16.12

These data indicate no correlation between total dose and distance from SONGS. The variations in the average dose is approximately equal to the median two sigma variation of measurement (1.8 mR per quarter). Statistically, the CONTROL and indicator doses are the same value. The routine indicator location at the Units 2/3 midpoint) had the highest TLD average in 2005. The operation of SONGS had no impact on the environment as measured by this sample medium.

Figures 2A & 2B compare environmental radiation levels of indicator and CONTROL locations for the operational year 2005 and for previous years. These figures show the close correlation between the CONTROL and indicator location TLD dose data.

### Nonroutine Direct Radiation Samples

Duplicate QC TLDs were installed adjacent to TLD #66 and TLD #67. Refer to Appendix C for results. These TLDs were not required by the ODCM and are not included in the Statistical Summary of REMP Data.

### ISFSI Direct Radiation Samples

ISFSI (Independent Spent Fuel Storage Installation) TLDs were deployed in the vicinity of the ISFSI. Data from these TLDs have not been included in the statistical summary of REMP data since these TLDs are not required by the ODCM. The ISFSI data are listed and discussed in Appendix J.

### B. Airborne Particulate, Iodine, and Composite Isotopic Analyses

Air particulate samples were collected on a weekly basis from eight indicator locations and from one CONTROL location. The samples were analyzed for gross beta activity, I-131, and composited quarterly for gamma isotopic analysis. Sample locations were selected according to the requirements of the Unit 1 and Units 2/3 Offsite Dose Calculation Manuals.

Gross beta analysis is a measure of total radioactivity of beta-emitting radionuclides in a sample. Beta radiation is emitted by many radionuclides, but beta decay gives a continuous energy spectrum rather than the discrete lines or peaks associated with gamma radiation. Gross beta measurements only indicate whether the sample contains normal or abnormal concentrations of beta-emitting radionuclides and does not identify specific radionuclides. Gross beta measurement data serves as a screening tool to determine if further analysis is required.

Nearly all gross beta activity analysis results were above the *a posteriori* MDC. The concentration of gross beta activity in the samples collected from the indicator locations ranged from 0.0042 to 0.0791 pCi/m<sup>3</sup>, averaging 0.0239 pCi/m<sup>3</sup> of air. The concentrations of gross beta activity in the samples from the CONTROL location ranged from 0.0063 to 0.0760 pCi/m<sup>3</sup>, averaging 0.0231 pCi/m<sup>3</sup> of air. Figure 3D shows the variation in gross beta activity level in 2005 at different locations. These graphs show a close correlation between the indicator and CONTROL location data.

Per the requirements of Unit 1 and Units 2/3 ODCM, Section 5, Table 5.1, an assessment was performed to determine whether the gross beta activity of the indicators exceeded 10 times the background (CONTROL location #15). The results showed that indicator locations maximum gross beta activity in air in 2005 was 0.0791 pCi/m<sup>3</sup> and the 2004 CONTROL location average was 0.0245 pCi/m<sup>3</sup>. No action was taken since no indicator location value exceeded ten times the annual average gross beta activity of the CONTROL location data from the previous year.

All samples analyzed for I-131 were less than the *a posteriori* MDC and all I-131 samples were less than the *a priori* lower limit of detection (LLD). The airborne indicator and CONTROL I-131 REMP samples taken in 2005 at SONGS were statistically indistinguishable from zero.

No samples yielded station related isotopic results confirmed above the *a posteriori* MDC. Quarterly composite gamma spectral analysis analyses yielded only naturally occurring beryllium-7 (Be-7) above the *a posteriori* MDC.

We conclude that the operation of SONGS had no impact on the environment as measured by this sample medium.

### **C. Ocean Water**

Monthly ocean water samples were collected from indicator locations in the vicinity of each station discharge and from the CONTROL location at Newport Beach. The samples were analyzed for naturally-occurring and SONGS-related gamma-emitting radionuclides. Quarterly composite ocean water samples were analyzed for tritium according to ODCM requirements. Naturally occurring potassium-40 (K-40) was detected in all ocean water samples obtained in 2005. No SONGS related radionuclides were detected in this sample medium during 2005.

Four non-ODCM ocean water samples were obtained from two locations, Unit 2 outfall conduit and Unit 3 outfall conduit. The conduit samples were collected to measure the radiological environmental effect potentially resulting from the minor conduit leakage

Throughout 2005, only naturally occurring K-40 was detected in the monthly gamma spectral analyses of ocean water. No station related radionuclides were detected above the *a posteriori* MDC in this sample type during 2005.

Excluding K-40, the ocean water gamma isotopic database is statistically indistinguishable from a database with zero activity.

The data indicate that the operation of SONGS had no impact on the environment as measured by this sample medium.

### **D. Drinking Water**

In 2005, drinking water samples were collected on a monthly basis from one indicator location and from the Oceanside CONTROL location. Samples were analyzed for tritium, gross beta, and 26 naturally-occurring and SONGS-related gamma emitting radionuclides. There is no drinking water pathway for liquid effluent at SONGS.

No station related radionuclides were detected in drinking water during 2005. Excluding gross beta, the drinking water gamma isotopic database is statistically indistinguishable from a database with zero activity. The operation of SONGS had no impact on this sample medium.

### **E. Shoreline Sediment (Beach Sand)**

Beach sand was collected semiannually in 2005 from three indicator locations and from a CONTROL location situated in Newport Beach. After collection, the samples were analyzed for 26 different plant-related and naturally-occurring radionuclides. Only naturally occurring K-40 and thorium-228 (Th-228) were detected. No plant related radionuclides were reported above the *a posteriori* MDC. The operation of SONGS had no impact on the environment as measured by this sample medium.



#### ***F. Ocean Bottom Sediments***

Ocean bottom sediments were collected in the vicinity of each of the three SONGS discharge locations and at the Newport Beach CONTROL location. The samples were analyzed by gamma-spectral analysis for 26 naturally-occurring and station-related radionuclides. K-40 and Th-228 were detected in all ocean bottom sediment samples collected during 2005. One indicator sample yielded low level Cs-137.

Four non-ODCM ocean bottom sediment samples were obtained from two locations, Unit 2 outfall conduit and Unit 3 outfall conduit. The conduit samples were collected to measure the radiological environmental effect potentially resulting from the minor conduit leakage. During 2005, all the conduit sample analysis results were below the MDC for station related radionuclides.

We conclude that the operation of SONGS had no significant impact on the environment as measured by this sample medium.

#### ***G. Non-Migratory Marine Species (Flesh)***

Species of adult fish, crustacea and mollusks, were collected on a semi annual basis at the SONGS Unit 1 outfall, the SONGS Units 2/3 outfall and from Laguna Beach CONTROL location. The flesh portion of each sample type was analyzed for 26 gamma-emitting station-related and naturally occurring radionuclides. The results were subsequently reported to Edison in terms of wet sample weights. Because results based on a wet sample weight are most useful for calculating doses, the results of sample analyses are summarized in terms of "as received" wet weights.

No plant related radionuclides were confirmed above the *a posteriori* MDC.

Naturally-occurring K-40 was detected in most marine species samples collected during 2005. No plant related isotopes were reported above the *a posteriori* MDC. The operation of SONGS had no impact on the environment as measured by this sample medium. The potential dose to members of the public from consumption of marine species near SONGS is negligible.

#### ***H. Local Crops***

Fleshy and leafy crops were collected semiannually in 2005 from the SONGS garden and from CONTROL locations near Oceanside. The crop samples were analyzed quantitatively for 26 gamma-emitting radionuclides, both natural and plant related. Only naturally occurring radionuclides were detected. SONGS had no measurable impact on this sample medium.

#### ***I. Soil***

To determine if there is evidence of a build-up of radionuclides in the land near SONGS, indicator soil samples were collected from the East Site Boundary (Former Visitor's center), Old Route 101, Basilone Road, and Camp San Onofre. A CONTROL sample was obtained from Oceanside. Surface soil was collected from all indicator and CONTROL locations at the depth

of 3 inches. The sampling protocol is consistent with the procedure described in HASL-300. Soil sampling is not required by ODCMs.

Soil samples were analyzed for 26 naturally-occurring and SONGS-related gamma-emitting radionuclides using gamma spectral analysis. All 2005 soil samples yielded naturally occurring K-40 and Th-228. Cs-137, above the *a posteriori* MDC, was detected in two indicator samples. Cs-137 is often detected in environmental sediment samples and the presence of Cs-137 is most likely related to nuclear weapons testing fallout.

Cs-137 and strontium-90 (Sr-90) were detected in soil profile analyses conducted in previous years. These radionuclides are mostly due to the nuclear weapons testing fallout depositing on soil and retention of these radionuclides due to their long half lives. The presence of Cs-137 in the CONTROL location in previous years supports the conclusion that the major source of this radionuclide is fallout deposition. Refer to the 1993 AREOR for a more detailed discussion of Cs-137 and other potentially SONGS related isotopes detected in soil. The Cs-137 activity can be attributed to atmospheric nuclear weapons tests and not SONGS operations. During 2005, the operation of SONGS had no impact on the environment as measured by this sample medium.

#### ***J. Kelp Sampling***

Kelp was collected during April and October 2005 from the San Onofre kelp beds, San Mateo kelp beds, Barn kelp beds, and from the Salt Creek CONTROL location. Upon collection, the samples were analyzed by gamma-spectral analysis for 26 different naturally-occurring and Station-related radionuclides. The radionuclides detected in 2005 were Be-7, K-40 and I-131. K-40 and Be-7 are naturally occurring and not related to the operation of SONGS. I-131 was detected in one CONTROL samples and four indicator samples. I-131 is often detected in Sewage Plant outfalls, including those routed to the Pacific Ocean.

I-131 has been detected at indicator and CONTROL locations in previous years. The northern CONTROL location is too far away and in the predominantly upstream current direction for the I-131 activity to be attributable to SONGS. The presence of low levels of I-131 in both the indicator and the control locations suggest a source which is external to SONGS. The I-131 activity in kelp data, graphically presented in Figure 4, shows a relatively close correlation between indicator and control locations over a 25 year period - further supporting the assessment that the likely source for this radionuclide is external to SONGS.

**TABLE B-1**

**Summary of SONGS related Gamma Isotopic Analyses confirmed above MDC**

<b>Sample Media &amp; location</b>	<b>Radionuclide</b>	<b>Sample Value</b>	<b>MDC (<i>a posteriori</i>)</b>
Aquatic Kelp San Onofre Kelp Bed Station A 20APR05	I-131	(78 ± 31) E-3 pCi/g	43 E-3 pCi/g
Aquatic Kelp San Onofre Kelp Bed Station A 19OCT05	I-131	(24 ± 14) E-3 pCi/g	20 E-3 pCi/g
Aquatic Kelp San Mateo Kelp Bed Station B 20APR05	I-131	(57 ± 35) E-3 pCi/g	54 E-3 pCi/g
Aquatic Kelp Barn Kelp Bed Station C 20APR05	I-131	(69 ± 34) E-3 pCi/g	49 E-3 pCi/g
Aquatic Kelp Salt Creek (CONTROL) Station E 20APR05	I-131	(144 ± 42) E-3 pCi/g	58 E-3 pCi/g
Soil Camp San Onofre Location # 1 15SEP05	Cs-137	(53 ± 16) E-3 pCi/g	25 E-3 pCi/g
Soil Former Visitor Center Location #5 15SEP05	Cs-137	(87 ± 28) E-3 pCi/g	37 E-3 pCi/g
Ocean Bottom Sediment Unit 3 Outfall Station D 12OCT05	Cs-137	(11.2 ± 6.7) E-3 pCi/g	11.0 E-3 pCi/g

**TABLE B-2**  
**REMP SAMPLE ANALYSIS SUMMARY FOR 2005**

<b>Medium</b>	<b>Analysis Type</b>	<b>Sampling Frequency</b>	<b># of Locations</b>	<b>Total # of Analyses in 2005</b>
Direct Radiation	Dosimetry	Quarterly	49	196
Airborne Particulates	Gross Beta	Weekly	9	468
Charcoal Cartridge	I-131	Weekly	9	468
Airborne Particulates	Ge (Li) Scan	Quarterly	9	36
Ocean Water	Ge (Li) Scan	Monthly	4	48
Ocean Water	H-3	Quarterly	4	16
Ocean Water Conduit	Ge (Li) Scan	Semi-Annually	2	4
Drinking Water, Unfiltered	Ge (Li) Scan	Monthly	2	24
	H-3		2	24
	Gross Beta		2	24
Shoreline Sediment	Ge (Li) Scan	Semi-Annually	4	8
Ocean Bottom Sediment	Ge (Li) Scan	Semi-Annually	7	14
Marine Species, Flesh	Ge (Li) Scan	Semi-Annually	3	30
Crops	Ge (Li) Scan	Semi-Annually	2	8
Kelp	Ge (Li) Scan	Semi-Annually	4	8
Soil	Ge (Li) Scan	Annually	5	5

**STATISTICAL SUMMARY OF REMP DATA FOR 2005**

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on: 03/10/05

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period: 1/1/2005 to 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)		

Quarterly Gamma Exposure – Table 1A (mR/std quarter)

Gamma	196	5	17.19 (152/152) (10.13 – 29.32)	South Yard Facility, 0-4, ESE	24.33 (4/4) (22.34 – 26.83)	16.12 (44/44) (12.96 – 20.05)	
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- (1) Indicator location TLDs include all REMP TLDs 5.0 miles or closer to SONGS 2/3 midpoint.
- (2) CONTROL location TLDs include all REMP TLDs more than 5.0 miles from SONGS 2/3 midpoint.
- (3) Indicator location TLD data excludes QC TLDs, transit dose TLDs, and ISFSI TLDs.

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on: 03/16/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
 SAN DIEGO COUNTY, CALIFORNIA

Reporting Period: 1/1/2005 to 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)		
Weekly Airborne Particulates Gross Beta Activity – Table 2 (pCi/cu.m)							
	Gross Beta 468	0.01	0.0239 (416/416) (0.0042 – 0.0791)	Former SONGS Evaporation Pond 0.6 Miles NW	0.0262 (59/52) (0.0059 – 0.0791)	0.0231 (52/52) (0.0063 – 0.0760)	0

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on: 03/16/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
 SAN DIEGO COUNTY, CALIFORNIA

Reporting Period: 1/1/2005 to 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements	
				Name, Distance and Direction	Mean (Range)			
Weekly Radioiodine I-131 Activity – Table 3 (pCi/cu.m)								
	I-131	468	0.07	0.018 (24/416) (0.011 – 0.026)	Marine Corps Base 0.7 miles E	0.020 (3/52) (0.018 – 0.022)	0.019 (1/52) (0.019 – 0.019)	0



ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on: 03/16/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period: 1/1/2005 to 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)		Location with Highest Annual Mean Name, Distance and Direction Mean (Range)		Control Locations Mean (Range)		Number of Nonroutine Reported Measurements	
			Mean	(Range)	Name, Distance and Direction	Mean (Range)	Mean (Range)			
Quarterly Comp. Airborne Particulates Gamma – Table 4A (pCi/cu.m)										
Be-7	36	0.04	0.124	(32/32) (0.0580 – 0.203)	AWS Roof 0.18 Miles NW	0.139	(4/4) (0.110 – 0.175)	0.11	(4/4) (0.0880 – 0.16)	0
Cs-134	36	0.05	<LLD	(0/36)				<LLD	(0/4) (-)	0
Cs-137	36	0.06	<LLD	(0/36) (-)		---		<LLD	(0/4) (-)	0

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 03/31/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements		
				Name, Distance and Direction	Mean (Range)				
Monthly Ocean Water Gamma Spectral Analysis - Table 5 (pCi/l)									
Ba-140	52	15	5.85 (5.20 - 6.50)	(2/40)	Unit 2 Conduit 0.1 Mi. SW	6.50 (1/2) (6.50 - 6.50)	< LLD (-)	(0/12)	0
Co-58	52	15	3.30 (3.30 - 3.30)	(1/40)	(A) Station Discharge Outfall-Unit 1 0.6 Mi. SW	3.30 (1/12) (3.30 - 3.30)	< LLD (-)	(0/12)	0
Co-60	52	15	3.30 (2.10 - 4.50)	(2/40)	(B) Outfall - Unit 2 1.5 Mi. SW	4.50 (1/12) (4.50 - 4.50)	< LLD (-)	(0/12)	0
Cs-134	52	15	2.75 (2.10 - 3.40)	(2/40)	(D) Newport Beach 30 Mi. NW	3.95 (2/12) (3.60 - 4.30)	3.95 (3.60 - 4.30)	(2/12)	0
Cs-137	52	18	2.88 (2.40 - 3.60)	(4/40)	(B) Outfall - Unit 2 1.5 Mi. SW	2.97 (3/12) (2.40 - 3.60)	< LLD (-)	(0/12)	0
Fe-59	52	30	9.73 (8.20 - 11.00)	(3/40)	(A) Station Discharge Outfall-Unit 1 0.6 Mi. SW	10.50 (2/12) (10.00 - 11.00)	8.00 (8.00 - 8.00)	(1/12)	0
I-131	52	15	4.10 (4.10 - 4.10)	(1/40)	(B) Outfall - Unit 2 1.5 Mi. SW	4.10 (1/12) (4.10 - 4.10)	3.70 (3.70 - 3.70)	(1/12)	0
K-40	52	150	310.90 (190.00 - 410.00)	(40/40)	Unit 2 Conduit 0.1 Mi. SW	356.50 (2/2) (351.00 - 362.00)	300.50 (154.00 - 363.00)	(12/12)	0
La-140	52	15	6.75 (6.00 - 7.50)	(2/40)	Unit 2 Conduit 0.1 Mi. SW	7.50 (1/2) (7.50 - 7.50)	< LLD (-)	(0/12)	0
Mn-54	52	15	2.90 (2.20 - 3.90)	(4/40)	Unit 2 Conduit 0.1 Mi. SW	3.90 (1/2) (3.90 - 3.90)	< LLD (-)	(0/12)	0
Nb-95	52	15	3.63 (2.80 - 4.80)	(3/40)	Unit 3 Conduit 0.1 Mi. SSW	4.80 (1/2) (4.80 - 4.80)	< LLD (-)	(0/12)	0

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Produced on : 03/31/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements			
				Name, Distance and Direction	Mean (Range)					
Monthly Ocean Water Gamma Spectral Analysis - Table 5 (pCi/l)										
Zn-65	52	30	5.80 (4.20 - 7.40)	(2/40)	(A) Station Discharge Outfall-Unit 1 0.6 Mi. SW	7.40 (7.40 - 7.40)	(1/12)	< LLD ( - )	(0/12)	0
Zr-95	52	15	4.40 (4.40 - 4.40)	(1/40)	(D) Newport Beach 30 Mi. NW	4.85 (4.60 - 5.10)	(2/12)	4.85 (4.60 - 5.10)	(2/12)	0

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 03/31/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements		
				Name, Distance and Direction	Mean (Range)				
Quarterly Composite Ocean Water Tritium Activity - Table 7 (pCi/l)									
	H-3	16	2000 < LLD (-)	(0/12)	----	(0/4)	< LLD (-)	(0/4)	0

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Produced on : 03/26/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements	
				Name, Distance and Direction	Mean (Range)			
Monthly Drinking Water Analysis - Table 9A (pCi/l)								
Ba-140	24	15	< LLD (-)	(0/12)	Oceanside (Control) 15.6 Mi. SE	3.85 (2/12) (3.60 - 4.10)	3.85 (2/12) (3.60 - 4.10)	0
Co-58	24	15	< LLD (-)	(0/12)		---- (0/12) (-)	< LLD (0/12) (-)	0
Co-60	24	15	2.70 (2.70 - 2.70)	(1/12)	Oceanside (Control) 15.6 Mi. SE	2.90 (1/12) (2.90 - 2.90)	2.90 (1/12) (2.90 - 2.90)	0
Cs-134	24	15	3.30 (2.90 - 3.90)	(3/12)	Oceanside (Control) 15.6 Mi. SE	3.50 (1/12) (3.50 - 3.50)	3.50 (1/12) (3.50 - 3.50)	0
Cs-137	24	18	2.60 (2.60 - 2.60)	(1/12)	Camp Pendleton 2.2 Mi. NNW	2.60 (1/12) (2.60 - 2.60)	1.70 (1/12) (1.70 - 1.70)	0
Fe-59	24	30	3.90 (3.90 - 3.90)	(1/12)	Camp Pendleton 2.2 Mi. NNW	3.90 (1/12) (3.90 - 3.90)	< LLD (0/12) (-)	0
Gross Beta	24	4	3.71 (2.00 - 5.70)	(10/12)	Oceanside (Control) 15.6 Mi. SE	6.95 (12/12) (4.70 - 10.20)	6.95 (12/12) (4.70 - 10.20)	0
H-3	24	2000	1000.00 (1000.00 - 1000.00)	(2/12)	Camp Pendleton 2.2 Mi. NNW	1000.00 (2/12) (1000.00 - 1000.00)	< LLD (0/12) (-)	0
I-131	24	15	3.50 (3.50 - 3.50)	(1/12)	Camp Pendleton 2.2 Mi. NNW	3.50 (1/12) (3.50 - 3.50)	< LLD (0/12) (-)	0
La-140	24	15	< LLD (-)	(0/12)	Oceanside (Control) 15.6 Mi. SE	4.45 (2/12) (4.20 - 4.70)	4.45 (2/12) (4.20 - 4.70)	0
Mn-54	24	15	< LLD (-)	(0/12)	Oceanside (Control) 15.6 Mi. SE	2.80 (1/12) (2.80 - 2.80)	2.80 (1/12) (2.80 - 2.80)	0

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Produced on : 03/26/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements			
				Name, Distance and Direction	Mean (Range)					
Monthly Drinking Water Analysis - Table 9A (pCi/l)										
Nb-95	24	15	< LLD (-)	(0/12)	----	(0/12)	< LLD (-)	(0/12)	0	
Zn-65	24	30	11.65 (6.30 - 17.00)	(2/12)	Camp Pendleton 2.2 Mi. NNW	11.65 (6.30 - 17.00)	(2/12)	< LLD (-)	(0/12)	0
Zr-95	24	15	4.90 (4.90 - 4.90)	(1/12)	Oceanside (Control) 15.6 Mi. SE	5.00 (5.00 - 5.00)	(1/12)	5.00 (5.00 - 5.00)	(1/12)	0

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Produced on: 03/16/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period: 1/1/2005 to 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)		Location with Highest Annual Mean		Control Locations Mean (Range)		Number of Nonroutine Reported Measurements
			Mean	(Range)	Name, Distance and Direction	Mean (Range)	Mean (Range)		
Semi-annual Shoreline Sediment Gamma Spectral Analysis – Table 10 (pCi/g)									
Cs-134	8	0.15	<LLD (-)	(0/6)	---	(0/2)	<LLD (-)	(0/2)	0
Cs-137	8	0.18	<LLD (-)	(0/6)	---	(0/2)	<LLD (-)	(0/2)	0
K-40	8	1.5	13.08 (9.18 - 15.07)	(6/6)	Newport Beach North End 29.2 Mi. NW	18.12 (2/2) (18.04 - 18.20)	18.12 (2/2) (18.04 - 18.20)		0
Th-228	8	0.4	0.23 (0.15 - 0.47)	(6/6)	Newport Beach North End 29.2 Mi. NW	0.63 (2/2) (0.34 - 0.92)	0.63 (2/2) (0.34 - 0.92)		0

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SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements			
				Name, Distance and Direction	Mean (Range)					
Semi-annual Ocean Bottom Sediment Gamma Spectral Analysis - Table 11 (pCi/g)										
Cs-134	14	0.15	< LLD (-)	(0/12)	----	(0/2)	< LLD (-)	(0/2)	0	
Cs-137	14	0.18	0.0226 (0.0112 - 0.0340)	(2/12)	(C) Unit 2 Outfall 1.6 Mi. SW	0.0340 (0.0340 - 0.0340)	(1/2)	< LLD (-)	(0/2)	0
K-40	14	1.5	15.19 (12.73 - 19.30)	(12/12)	(B) Unit 1 Outfall 0.8 Mi. SSW	18.05 (16.80 - 19.30)	(2/2)	13.07 (8.58 - 17.56)	(2/2)	0
Th-228	14	0.4	0.60 (0.13 - 1.34)	(12/12)	Unit 2 Conduit 0.1 Mi. SW	0.91 (0.47 - 1.34)	(2/2)	0.34 (0.16 - 0.53)	(2/2)	0



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SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)							
Bay Mussel	Co-58 6	0.13 < LLD (-)	(0/4)	----	(0/2) (-)	< LLD (0/2) (-)	0
Bay Mussel	Co-60 6	0.13 < LLD (-)	(0/4)	----	(0/2) (-)	< LLD (0/2) (-)	0
Bay Mussel	Cs-134 6	0.13 < LLD (-)	(0/4)	----	(0/2) (-)	< LLD (0/2) (-)	0
Bay Mussel	Cs-137 6	0.15 < LLD (-)	(0/4)	----	(0/2) (-)	< LLD (0/2) (-)	0
Bay Mussel	Fe-59 6	0.26 < LLD (-)	(0/4)	----	(0/2) (-)	< LLD (0/2) (-)	0
Bay Mussel	K-40 6	1.4 1.85 (1.68 - 2.07)	(4/4)	(C) Laguna Beach 18.2 Mi. NW	1.95 (2/2) (1.90 - 1.99)	1.95 (2/2) (1.90 - 1.99)	0
Bay Mussel	Mn-54 6	0.13 < LLD (-)	(0/4)	----	(0/2) (-)	< LLD (0/2) (-)	0
Bay Mussel	Zn-65 6	0.26 < LLD (-)	(0/4)	----	(0/2) (-)	< LLD (0/2) (-)	0
Blacksmith	Co-58 2	0.13 < LLD (-)	(0/1)	----	(0/1) (-)	< LLD (0/1) (-)	0
Blacksmith	Co-60 2	0.13 < LLD (-)	(0/1)	(C) Laguna Beach 18.2 Mi. NW	0.0190 (1/1) (0.0190 - 0.0190)	0.0190 (1/1) (0.0190 - 0.0190)	0
Blacksmith	Cs-134 2	0.13 < LLD (-)	(0/1)	----	(0/1) (-)	< LLD (0/1) (-)	0

Bay Mussel includes both Bay Mussel and California Mussel data.

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SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)		Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements			
			Mean	(Range)	Name, Distance and Direction	Mean (Range)					
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)											
Blacksmith	Cs-137	2	0.15	< LLD (-)	(0/1)	----	(0/1)	< LLD (-)	(0/1)	0	
Blacksmith	Fe-59	2	0.26	< LLD (-)	(0/1)	(C) Laguna Beach 18.2 Mi. NW	0.0650 (0.0650 - 0.0650)	(1/1)	0.0650 (0.0650 - 0.0650)	(1/1)	0
Blacksmith	K-40	2	1.4	3.92 (3.92 - 3.92)	(1/1)	(A) Unit 1 Outfall 0.9 Mi. WSW	3.92 (3.92 - 3.92)	(1/1)	3.09 (3.09 - 3.09)	(1/1)	0
Blacksmith	Mn-54	2	0.13	< LLD (-)	(0/1)	----	(0/1)	< LLD (-)	(0/1)	0	
Blacksmith	Zn-65	2	0.26	< LLD (-)	(0/1)	----	(0/1)	< LLD (-)	(0/1)	0	
Black Perch	Co-58	2	0.13	< LLD (-)	(0/2)	----	(0/2)	< LLD (-)	(0/0)	0	
Black Perch	Co-60	2	0.13	< LLD (-)	(0/2)	----	(0/2)	< LLD (-)	(0/0)	0	
Black Perch	Cs-134	2	0.13	0.0210 (0.0210 - 0.0210)	(1/2)	(A) Unit 1 Outfall 0.9 Mi. WSW	0.0210 (0.0210 - 0.0210)	(1/2)	< LLD (-)	(0/0)	0
Black Perch	Cs-137	2	0.15	< LLD (-)	(0/2)	----	(0/2)	< LLD (-)	(0/0)	0	
Black Perch	Fe-59	2	0.26	< LLD (-)	(0/2)	----	(0/2)	< LLD (-)	(0/0)	0	
Black Perch	K-40	2	1.4	2.90 (2.15 - 3.65)	(2/2)	(A) Unit 1 Outfall 0.9 Mi. WSW	2.90 (2.15 - 3.65)	(2/2)	< LLD (-)	(0/0)	0

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SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)		Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements			
			Mean	(Range)	Name, Distance and Direction	Mean (Range)					
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pC/g)											
Black Perch	Mn-54	2	0.13	< LLD (-)	(0/2)						
Black Perch	Zn-65	2	0.26	< LLD (-)	(0/2)						
Kelp Bass	Co-58	4	0.13	0.0230 (0.0230 - 0.0230)	(1/3)	(A) Unit 1 Outfall 0.9 Mi. WSW	0.0230 (0.0230 - 0.0230)	(1/1)	< LLD (-)	(0/1)	0
Kelp Bass	Co-60	4	0.13	< LLD (-)	(0/3)						0
Kelp Bass	Cs-134	4	0.13	< LLD (-)	(0/3)						0
Kelp Bass	Cs-137	4	0.15	< LLD (-)	(0/3)						0
Kelp Bass	Fe-59	4	0.26	< LLD (-)	(0/3)						0
Kelp Bass	K-40	4	1.4	3.22 (3.03 - 3.34)	(3/3)	(C) Laguna Beach 18.2 Mi. NW	4.16 (4.16 - 4.16)	(1/1)	4.16 (4.16 - 4.16)	(1/1)	0
Kelp Bass	Mn-54	4	0.13	< LLD (-)	(0/3)						0
Kelp Bass	Zn-65	4	0.26	< LLD (-)	(0/3)						0
Sheephead	Co-58	6	0.13	< LLD (-)	(0/4)						0

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DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)							
Sheephead	Co-60 6	0.13	< LLD (0/4) (-)		---- (0/2) (-)	< LLD (0/2) (-)	0
Sheephead	Cs-134 6	0.13	0.0260 (1/4) (0.0260 - 0.0260)	(B) Units 2 and 3 Outfall 1.5 Mi. SSW	0.0260 (1/3) (0.0260 - 0.0260)	0.0150 (1/2) (0.0150 - 0.0150)	0
Sheephead	Cs-137 6	0.15	< LLD (0/4) (-)		---- (0/2) (-)	< LLD (0/2) (-)	0
Sheephead	Fe-59 6	0.26	< LLD (0/4) (-)		---- (0/1) (-)	< LLD (0/2) (-)	0
Sheephead	K-40 6	1.4	3.18 (4/4) (2.77 - 3.50)	(C) Laguna Beach 18.2 Mi. NW	3.43 (2/2) (3.36 - 3.49)	3.43 (2/2) (3.36 - 3.49)	0
Sheephead	Mn-54 6	0.13	< LLD (0/4) (-)		---- (0/2) (-)	< LLD (0/2) (-)	0
Sheephead	Zn-65 6	0.26	< LLD (0/4) (-)		---- (0/2) (-)	< LLD (0/2) (-)	0
Sand Bass	Co-58 2	0.13	< LLD (0/2) (-)		---- (0/1) (-)	< LLD (0/0) (-)	0
Sand Bass	Co-60 2	0.13	< LLD (0/2) (-)		---- (0/1) (-)	< LLD (0/0) (-)	0
Sand Bass	Cs-134 2	0.13	< LLD (0/2) (-)		---- (0/1) (-)	< LLD (0/0) (-)	0
Sand Bass	Cs-137 2	0.15	< LLD (0/2) (-)		---- (0/1) (-)	< LLD (0/0) (-)	0

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SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)							
Sand Bass	Fe-59 2	0.26	< LLD (0/2) (-)		---- (0/1) (-)	< LLD (0/0) (-)	0
Sand Bass	K-40 2	1.4	3.64 (2/2) (3.40 - 3.88)	(B) Units 2 and 3 Outfall 1.5 Mi. SSW	3.88 (1/1) (3.88 - 3.88)	< LLD (0/0) (-)	0
Sand Bass	Mn-54 2	0.13	< LLD (0/2) (-)		---- (0/1) (-)	< LLD (0/0) (-)	0
Sand Bass	Zn-65 2	0.26	< LLD (0/2) (-)		---- (0/1) (-)	< LLD (0/0) (-)	0
Spiny Lobster	Co-58 8	0.13	< LLD (0/6) (-)		---- (0/3) (-)	< LLD (0/2) (-)	0
Spiny Lobster	Co-60 8	0.13	< LLD (0/6) (-)		---- (0/2) (-)	< LLD (0/2) (-)	0
Spiny Lobster	Cs-134 8	0.13	< LLD (0/6) (-)		---- (0/2) (-)	< LLD (0/2) (-)	0
Spiny Lobster	Cs-137 8	0.15	0.0255 (2/6) (0.0210 - 0.0300)	(A) Unit 1 Outfall 0.9 Mi. WSW	0.0300 (1/3) (0.0300 - 0.0300)	< LLD (0/2) (-)	0
Spiny Lobster	Fe-59 8	0.26	< LLD (0/6) (-)		---- (0/2) (-)	< LLD (0/2) (-)	0
Spiny Lobster	K-40 8	1.4	2.87 (6/6) (2.21 - 3.70)	(C) Laguna Beach 18.2 Mi. NW	3.55 (2/2) (3.41 - 3.68)	3.55 (2/2) (3.41 - 3.68)	0
Spiny Lobster	Mn-54 8	0.13	< LLD (0/6) (-)		---- (0/2) (-)	< LLD (0/2) (-)	0

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**DOCKET NOS. 50-206, 50-361, 50-362**

**SAN DIEGO COUNTY, CALIFORNIA**

**Reporting Period : 1/1/2005 To 12/31/2005**

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)		
Semi Annual Non-migratory Marine Animals (Flesh) Analysis - Table 12A (pCi/g)							
Spiny Lobster	Zn-65      8	0.26	0.0290      (1/6) (0.0290 - 0.0290)	(B) Units 2 and 3 Outfall 1.5 Mi.    SSW	0.0290      (1/3) (0.0290 - 0.0290)	< LLD (-)	(0/2)      0

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SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean Name, Distance and Direction	Mean (Range)	Control Locations Mean (Range)	Number of Nonroutine Reported Measurements	
Semi-Annual Local Crops Gamma Spectral Analysis - Table 13A (pCi/g)								
Arugula	Cs-134 2	0.06	< LLD (-)	(0/0)	----	(0/2) < LLD (-)	(0/2) 0	
Arugula	Cs-137 2	0.08	< LLD (-)	(0/0)	----	(0/2) < LLD (-)	(0/2) 0	
Arugula	I-131 2	0.06	< LLD (-)	(0/0)	----	(0/2) < LLD (-)	(0/2) 0	
Arugula	K-40 2	1	< LLD (-)	(0/0)	South East of Oceanside 22 Mi. SE	3.61 (2/2) (2.69 - 4.52)	3.61 (2/2) (2.69 - 4.52)	0
Sorrel	Cs-134 2	0.06	< LLD (-)	(0/2)	----	(0/2) < LLD (-)	(0/0) 0	
Sorrel	Cs-137 2	0.08	< LLD (-)	(0/2)	----	(0/2) < LLD (-)	(0/0) 0	
Sorrel	I-131 2	0.06	< LLD (-)	(0/2)	----	(0/2) < LLD (-)	(0/0) 0	
Sorrel	K-40 2	1	3.33 (3.21 - 3.44)	(2/2)	SONGS Garden 0.4 Mi. NNW	3.33 (2/2) (3.21 - 3.44)	< LLD (-)	(0/0) 0
Tomato	Cs-134 4	0.06	< LLD (-)	(0/2)	South East of Oceanside 22 Mi. SE	0.0140 (1/2) (0.0140 - 0.0140)	0.0140 (1/2) (0.0140 - 0.0140)	0
Tomato	Cs-137 4	0.08	< LLD (-)	(0/2)	----	(0/2) < LLD (-)	(0/2) 0	
Tomato	I-131 4	0.06	< LLD (-)	(0/2)	----	(0/2) < LLD (-)	(0/2) 0	

**ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY  
SAN ONOFRE NUCLEAR GENERATING STATION**

Produced on : 03/17/06

**DOCKET NOS. 50-206, 50-361, 50-362  
SAN DIEGO COUNTY, CALIFORNIA**

**Reporting Period : 1/1/2005 To 12/31/2005**

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)		
Semi-Annual Local Crops Gamma Spectral Analysis - Table 13A (pCi/g)							
Tomato	K-40 4	1	2.26 (2/2) (2.10 - 2.42)	SONGS Garden 0.4 Mi. NNW	2.26 (2/2) (2.10 - 2.42)	1.71 (2/2) (1.49 - 1.92)	0



ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 03/17/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)		Location with Highest Annual Mean Name, Distance and Direction		Control Locations Mean (Range)		Number of Nonroutine Reported Measurements		
			Mean	(Range)	Mean	(Range)	Mean	(Range)			
	Cs-134	5	0.15	< LLD ( - )	(0/4)	----	(0/1)	< LLD ( - )	(0/1)	0	
	Cs-137	5	0.18	0.0553 (0.0260 - 0.0870)	(3/4)	Former Visitor's Center (East Site Boundary) 0.4 Mi. NW	0.0870 (0.0870 - 0.0870)	(1/1)	< LLD ( - )	(0/1)	0
	K-40	5	1.5	14.85 (6.85 - 21.49)	(4/4)	Camp San Onofre 2.6 Mi. NE	21.49 (21.49 - 21.49)	(1/1)	16.86 (16.86 - 16.86)	(1/1)	0
	Th-228	5	0.4	0.53 (0.29 - 0.87)	(4/4)	Oceanside 16 Mi. SE	1.69 (1.69 - 1.69)	(1/1)	1.69 (1.69 - 1.69)	(1/1)	0

Annual Soil Analysis - Depth 3' - Table 14 (pCi/g)

ENVIRONMENTAL RADIOLOGICAL MONITORING PROGRAM SUMMARY

Produced on : 03/17/06

SAN ONOFRE NUCLEAR GENERATING STATION

DOCKET NOS. 50-206, 50-361, 50-362

SAN DIEGO COUNTY, CALIFORNIA

Reporting Period : 1/1/2005 To 12/31/2005

Medium or Pathway sampled (Unit of Measurement)	Type and Total Number of Analysis Performed	Lower Limit of Detection (LLD)	All Indicator Locations Mean (Range)	Location with Highest Annual Mean		Control Locations Mean (Range)	Number of Nonroutine Reported Measurements
				Name, Distance and Direction	Mean (Range)		
Semi-Annual Kelp Analysis - Table 15 (pCi/g)							
Macrocystis p.	Be-7 8	0.15	(1/6)	(C) Barn Kelp Bed 6.3 Mi. SSE	0.15 (1/2)	0.0520 (1/2)	0
		(0.15 - 0.15)			(0.15 - 0.15)	(0.0520 - 0.0520)	
Macrocystis p.	Cs-134 8	0.06	(0/6)		---- (0/2)	< LLD (0/2)	0
		< LLD (-)			(-)	(-)	
Macrocystis p.	Cs-137 8	0.08	(1/6)	(B) San Mateo Kelp Bed 3.8 Mi. WNW	0.0082 (1/2)	< LLD (0/2)	0
		(0.0082 - 0.0082)			(0.0082 - 0.0082)	(-)	
Macrocystis p.	I-131 8	0.06	(4/6)	(E) Salt Creek (CONTROL) 11 Mi. NNW	0.0795 (2/2)	0.0795 (2/2)	0
		(0.0240 - 0.0780)			(0.0150 - 0.14)	(0.0150 - 0.14)	
Macrocystis p.	K-40 8	1	(6/6)	(E) Salt Creek (CONTROL) 11 Mi. NNW	11.14 (2/2)	11.14 (2/2)	0
		(6.12 - 16.00)			(8.55 - 13.73)	(8.55 - 13.73)	

**APPENDIX C**  
**SUMMARY OF 2005 QUALITY CONTROL PROGRAMS**

All REMP samples are collected, shipped, and analyzed in accordance with NRC Regulatory Guide 4.15. Marine radiological environmental samples are collected by a vendor, MBC Environmental, per the vendor's Quality Assurance manual. REMP sample analysis is performed by the Contracted Environmental Analysis Laboratory (CEAL) in accordance with the Laboratory Quality Assurance Plan. During 2005 the CEAL was Duke Engineering Services.

#### **INTERLABORATORY CROSS-CHECK PROGRAM:**

The CEAL participates in a number of independent cross check programs, including the National Institute of Standards and Technology (NIST) and Analytics cross-check programs. A summary of the available 2005 Analytics cross check data is included in Table C-1. The CEAL's performance meets the criteria described in Reg. Guide 4.15. Discrepancies and out-of-tolerance results are resolved through a formal Condition Report evaluation process. During 2005, the acceptance criteria was met for all analytics cross-check samples.

#### **COMPARISON OF TLD AND PIC DATA**

The SONGS REMP measures direct radiation at the various indicator and CONTROL locations with Thulium doped  $\text{CaSO}_4$  Panasonic Thermoluminescent Dosimeters (TLDs). The TLDs are collected quarterly and the corresponding dose is measured by the contracted laboratory. Transit dose and fade are compensated for in the reported results. A number of the REMP TLDs are located adjacent to Pressurized Ion Chamber (PIC) direct radiation dose rate meters. Data from the PICs are fed into a central processing unit with readouts near the control room. The PICs serve to provide real time monitoring of the radiation dose rates in the inner ring of SONGS. PIC data from the first quarter of 2005 were assembled and the average dose rate was converted to a quarterly total dose. The resulting PIC measured total quarterly dose compare favorably to the measured TLD total quarterly dose as shown in the tables below.

TLD phosphors tend to over-respond to the lower energy levels and the TLD package has a thin lead shielding to compensate for this over-response. The complete TLD packages meet the requirements of ANSI N545. The energy response data for the PICs was reviewed for this report. The PIC energy response is relatively linear above ~75keV.

FIRST QUARTER 2005 PIC / TLD DATA COMPARISON

	PIC-1 & TLD 10	PIC-2 & TLD 67	PIC-3 & TLD 40	PIC-4 & TLD 61	PIC-5 & TLD 62	PIC-6 & TLD 63	PIC-7 & TLD 64	PIC-8 & TLD 65	PIC-9 & TLD 66
Average PIC Dose Rate in mR/hour	7.93E-03	7.71E-03	7.63E-03	7.14E-03	6.64E-03	6.81E-03	6.98E-03	6.32E-03	7.03E-03
PIC total quarterly dose in mR (91day)	17.3	16.8	16.7	15.6	14.5	14.9	15.2	13.8	15.4
TLD measured quarterly dose in mR ± one sigma (empirical)	17.41 ±0.84	17.25 ±0.93	18.34 ±0.92	15.58 ±0.75	13.41 ±0.85	14.33 ±0.57	15.51 ±0.69	14.41 ±0.89	14.67 ±0.85

QUARTERLY DUPLICATE TLDs

SONGS deployed a duplicate TLD package in the same location and canister as TLD 66. The quarterly dose measured by these separate TLD packages is nearly identical.

DUPLICATE TLD DATA COMPARISON

	1 <sup>ST</sup> QUARTER	2 <sup>ND</sup> QUARTER	3 <sup>RD</sup> QUARTER	4 <sup>TH</sup> QUARTER
TLD 66	14.67 ±0.85	15.04 ±0.91	14.61 ±1.13	14.47 ±0.85
TLD 200	14.24 ±0.90	15.15 ±1.11	14.11 ±1.02	13.60 ±0.69

## ANNUAL DUPLICATE TLDs

An annual duplicate TLD package is collocated with TLD 67.

<b>TLD 67 average dose in mR per standard quarter</b>	<b>TLD 201 (annual duplicate) dose in mR per standard quarter</b>
<b>16.64</b>	<b>16.92</b>

## CALIBRATION OF AIR SAMPLER VOLUME METERS

The Shop Services and Instrumentation Division of SCE performs an annual calibration procedure using standards referenced to NIST on all REMP air sampler gas meters. When the gas meters are removed from service, the meter is calibrated and the calibration reports are reviewed for bias. This is an *a posteriori* review of the gas meter performance to evaluate method bias and to identify possible outlier analysis results. In 2005, eight (8) gas meters failed to meet this criterion at all calibrated flow rates. A review of the affected gross beta data has revealed no meaningful anomalies. Thus no discernable impact to the REMP database or conclusions resulted from use of the out of tolerance gas meters. Replacement of the gas meters has been initiated due to the high calibration failure rate of the existing meters.

TABLE C-1

## ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
E4182-162	2nd / 2004	Water	H-3	pCi/L	11680	11900	0.98	Agreement
E4183-162	2nd / 2004	Filter	Gross Alpha	pCi	46.8	48.8	0.96	Agreement
E4183-162	2nd / 2004	Filter	Gross Beta	pCi	156	160	0.98	Agreement
E4184A-162	2nd / 2004	Filter	Ce-141	pCi	86	88.3	0.97	Agreement
E4184A-162	2nd / 2004	Filter	Cr-51	pCi	127	128	0.99	Agreement
E4184A-162	2nd / 2004	Filter	Cs-134	pCi	54	56.9	0.94	Agreement
E4184A-162	2nd / 2004	Filter	Cs-137	pCi	90	87.8	1.03	Agreement
E4184A-162	2nd / 2004	Filter	Co-58	pCi	27	26	1.03	Agreement
E4184A-162	2nd / 2004	Filter	Mn-54	pCi	42	39.7	1.06	Agreement
E4184A-162	2nd / 2004	Filter	Fe-59	pCi	27	25.1	1.09	Agreement
E4184A-162	2nd / 2004	Filter	Zn-65	pCi	62	56	1.11	Agreement
E4184A-162	2nd / 2004	Filter	Co-60	pCi	92	96.8	0.95	Agreement
E4185-162	2nd / 2004	Filter	Sr-89	pCi				(1)
E4185-162	2nd / 2004	Filter	Sr-90	pCi				(1)
E4186-162	2nd / 2004	Milk	I-131	pCi/L	55	58.2	0.95	Agreement
E4186-162	2nd / 2004	Milk	I-131LL	pCi/L	59	58.2	1.01	Agreement
E4186-162	2nd / 2004	Milk	Ce-141	pCi/L	165	157	1.06	Agreement
E4186-162	2nd / 2004	Milk	Cr-51	pCi/L	241	228	1.06	Agreement
E4186-162	2nd / 2004	Milk	Cs-134	pCi/L	99	101	0.98	Agreement
E4186-162	2nd / 2004	Milk	Cs-137	pCi/L	157	156	1.01	Agreement
E4186-162	2nd / 2004	Milk	Co-58	pCi/L	46	46.2	1.00	Agreement
E4186-162	2nd / 2004	Milk	Mn-54	pCi/L	73	70.5	1.04	Agreement
E4186-162	2nd / 2004	Milk	Fe-59	pCi/L	48	44.5	1.08	Agreement
E4186-162	2nd / 2004	Milk	Zn-65	pCi/L	100	99.3	1.01	Agreement

(1) – Problems encountered in filter dissolution, filter re-ordered.

TABLE C-1

## ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
E4186-162	2nd / 2004	Milk	Co-60	pCi/L	175	172	1.02	Agreement
MAPEP-04-RdF12	May-04	Filter	Sr-90	pCi	20.3	22.4	0.91	Agreement(2)
E4269-162	3rd / 2004	Water	Gross Alpha	pCi/L	41.3	42.7	0.97	Agreement
E4269-162	3rd / 2004	Water	Gross Beta	pCi/L	214	225	0.95	Agreement
E4270-162	3rd / 2004	Water	I-131LL	pCi/L	67.8	70.8	0.96	Agreement
E4270-162	3rd / 2004	Water	I-131	pCi/L	70.5	70.8	1.00	Agreement
E4270-162	3rd / 2004	Water	Ce-141	pCi/L	258	250	1.03	Agreement
E4270-162	3rd / 2004	Water	Cr-51	pCi/L	230	223	1.03	Agreement
E4270-162	3rd / 2004	Water	Cs-134	pCi/L	93.4	96.4	0.97	Agreement
E4270-162	3rd / 2004	Water	Cs-137	pCi/L	217	215	1.01	Agreement
E4270-162	3rd / 2004	Water	Co-58	pCi/L	93.4	94.6	0.99	Agreement
E4270-162	3rd / 2004	Water	Mn-54	pCi/L	181	181	1.00	Agreement
E4270-162	3rd / 2004	Water	Fe-59	pCi/L	95.2	91.6	1.04	Agreement
E4270-162	3rd / 2004	Water	Zn-65	pCi/L	180	178	1.01	Agreement
E4270-162	3rd / 2004	Water	Co-60	pCi/L	126	125	1.01	Agreement
E4271-162	3rd / 2004	Filter	Gross Alpha	pCi	38.3	36.8	1.04	Agreement
E4271-162	3rd / 2004	Filter	Gross Beta	pCi	191	194	0.98	Agreement
E4272-162	3rd / 2004	Milk	I-131LL	pCi/L	79.4	83.5	0.95	Agreement
E4272-162	3rd / 2004	Milk	I-131	pCi/L	81.1	83.5	0.97	Agreement
E4272-162	3rd / 2004	Milk	Ce-141	pCi/L	240	235	1.02	Agreement
E4272-162	3rd / 2004	Milk	Cr-51	pCi/L	214	210	1.02	Agreement
E4272-162	3rd / 2004	Milk	Cs-134	pCi/L	89.5	90.6	0.99	Agreement
E4272-162	3rd / 2004	Milk	Cs-137	pCi/L	204	202	1.01	Agreement
E4272-162	3rd / 2004	Milk	Co-58	pCi/L	90.9	89	1.02	Agreement

(2) – Replacement filter for first half 2004 from DOE MAPEP.



TABLE C-1

ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
E4272-162	3rd / 2004	Milk	Mn-54	pCi/L	173	171	1.01	Agreement
E4272-162	3rd / 2004	Milk	Fe-59	pCi/L	91.3	86.1	1.06	Agreement
E4272-162	3rd / 2004	Milk	Zn-65	pCi/L	169	167	1.01	Agreement
E4272-162	3rd / 2004	Milk	Co-60	pCi/L	116	118	0.98	Agreement
E4273-162	3rd / 2004	Milk	Sr-89	pCi/L	99.2	102	0.97	Agreement
E4273-162	3rd / 2004	Milk	Sr-90	pCi/L	23.4	24.5	0.96	Agreement
E4340-162	3rd / 2004*	Filter	Sr-89	pCi/L	151	152	1.00	Agreement
E4340-162	3rd / 2004*	Filter	Sr-90	pCi/L	53.5	58.8	0.91	Agreement
A18332-162	3rd / 2004	Liquid	Fe-55	µCi/cc	3.91E-04	4.08E-04	0.96	Agreement
A18333-162	3rd / 2004	Liquid	Sr-89	µCi/cc	1.83E-03	1.90E-03	0.96	Agreement
A18333-162	3rd / 2004	Liquid	Sr-90	µCi/cc	3.07E-04	3.16E-04	0.97	Agreement
A18656-162	4th / 2004	Liquid	Fe-55	µCi/cc	3.94E-04	4.44E-04	0.89	Agreement
A18657-162	4th / 2004	Liquid	Sr-89	µCi/cc	3.75E-03	3.55E-03	1.06	Agreement
A18657-162	4th / 2004	Liquid	Sr-90	µCi/cc	2.85E-04	2.82E-04	1.01	Agreement
E4380-162	4th / 2004	Water	H-3	pCi/L	8327	8060	1.03	Agreement
E4381-162	4th / 2004	Filter	Sr-89	pCi	87.7	92.3	0.95	Agreement
E4381-162	4th / 2004	Filter	Sr-90	pCi	8.78	10.6	0.83	Agreement
E4382-162	4th / 2004	Filter	Gross Alpha	pCi	24.9	29.5	0.84	Non-Agreement(3)
E4382-162	4th / 2004	Filter	Gross Beta	pCi	223	204	1.09	Agreement
E4383-162	4th / 2004	Filter	Ce-141	pCi	75.6	80.3	0.94	Agreement
E4383-162	4th / 2004	Filter	Cr-51	pCi	201	189	1.06	Agreement
E4383-162	4th / 2004	Filter	Cs-134	pCi	82.4	84.7	0.97	Agreement
E4383-162	4th / 2004	Filter	Cs-137	pCi	68.8	62.9	1.09	Agreement

(3) – Non-Agreement condition addressed in Corrective Action Program

\* - Replacement filter for lost 2nd quarter filter.

TABLE C-1

## ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
E4383-162	4th / 2004	Filter	Co-58	pCi	75.3	72.9	1.03	Agreement
E4383-162	4th / 2004	Filter	Mn-54	pCi	76.3	67.7	1.13	Agreement
E4383-162	4th / 2004	Filter	Fe-59	pCi	69.8	60.5	1.15	Non-Agreement(3)
E4383-162	4th / 2004	Filter	Zn-65	pCi	109	97.7	1.12	Agreement
E4383-162	4th / 2004	Filter	Co-60	pCi	85.1	87.1	0.98	Agreement
E4384-162	4th / 2004	Milk	I-131LL	pCi/L	64.2	66.7	0.96	Agreement
E4384-162	4th / 2004	Milk	I-131	pCi/L	69.0	66.7	1.03	Agreement
E4384-162	4th / 2004	Milk	Ce-141	pCi/L	154	155	0.99	Agreement
E4384-162	4th / 2004	Milk	Cr-51	pCi/L	385	379	1.02	Agreement
E4384-162	4th / 2004	Milk	Cs-134	pCi/L	167	170	0.98	Agreement
E4384-162	4th / 2004	Milk	Cs-137	pCi/L	132	126	1.05	Agreement
E4384-162	4th / 2004	Milk	Co-58	pCi/L	147	146	1.01	Agreement
E4384-162	4th / 2004	Milk	Mn-54	pCi/L	144	136	1.06	Agreement
E4384-162	4th / 2004	Milk	Fe-59	pCi/L	129	121	1.07	Agreement
E4384-162	4th / 2004	Milk	Zn-65	pCi/L	197	196	1.01	Agreement
E4383-162	4th / 2004	Milk	Co-60	pCi/L	177	175	1.01	Agreement
E4412-162	4th / 2004	Water	Sr-89	pCi/L	90.9	98.1	0.93	Agreement
E4412-162	4th / 2004	Water	Sr-90	pCi/L	9.33	11.3	0.83	Agreement
E4459-162	1st / 2005	Water	Gross Alpha	pCi/L	39.9	40.8	0.98	Agreement
E4459-162	1st / 2005	Water	Gross Beta	pCi/L	279	292	0.96	Agreement
E4460-162	1st / 2005	Water	I-131LL	pCi/L	66.2	65.9	1.00	Agreement
E4460-162	1st / 2005	Water	I-131	pCi/L	69.3	65.9	1.05	Agreement
E4460-162	1st / 2005	Water	Ce-141	pCi/L	219	221	0.99	Agreement
E4460-162	1st / 2005	Water	Cr-51	pCi/L	346	322	1.07	Agreement

(3) Non-Agreement condition addressed in Corrective Action Program

TABLE C-1

## ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
E4460-162	1st / 2005	Water	Cs-134	pCi/L	130	134	0.97	Agreement
E4460-162	1st / 2005	Water	Cs-137	pCi/L	127	125	1.01	Agreement
E4460-162	1st / 2005	Water	Co-58	pCi/L	108	111	0.97	Agreement
E4460-162	1st / 2005	Water	Mn-54	pCi/L	160	154	1.04	Agreement
E4460-162	1st / 2005	Water	Fe-59	pCi/L	114	107	1.07	Agreement
E4460-162	1st / 2005	Water	Zn-65	pCi/L	192	1991	1.01	Agreement
E4460-162	1st / 2005	Water	Co-60	pCi/L	138	139	1.00	Agreement
E4461-162	1st / 2005	Water	Sr-89	pCi/L	94.6	103	0.92	Agreement
E4461-162	1st / 2005	Water	Sr-90	pCi/L	15.6	17.2	0.90	Agreement
E4462-162	1st / 2005	Filter	Gross Alpha	pCi	20.8	21.9	0.95	Agreement
E4462-162	1st / 2005	Filter	Gross Beta	pCi	162	157	1.04	Agreement
E4463-162	1st / 2005	Milk	I-131LL	pCi/L	91.2	92.3	0.99	Agreement
E4463-162	1st / 2005	Milk	I-131	pCi/L	95.9	92.3	1.04	Agreement
E4463-162	1st / 2005	Milk	Ce-141	pCi/L	229	229	1.00	Agreement
E4463-162	1st / 2005	Milk	Cr-51	pCi/L	334	334	1.00	Agreement
E4463-162	1st / 2005	Milk	Cs-134	pCi/L	137	139	0.99	Agreement
E4463-162	1st / 2005	Milk	Cs-137	pCi/L	133	130	1.03	Agreement
E4463-162	1st / 2005	Milk	Co-58	pCi/L	118	115	1.02	Agreement
E4463-162	1st / 2005	Milk	Mn-54	pCi/L	166	160	1.04	Agreement
E4463-162	1st / 2005	Milk	Fe-59	pCi/L	117	111	1.05	Agreement
E4463-162	1st / 2005	Milk	Zn-65	pCi/L	203	198	1.03	Agreement
E4463-162	1st / 2005	Milk	Co-60	pCi/L	145	144	1.01	Agreement
E4464-162	1st / 2005	Milk	Sr-89	pCi/L	93.8	107	0.88	Agreement
E4464-162	1st / 2005	Milk	Sr-90	pCi/L	16.1	17.9	0.90	Agreement
A17776-162	1st / 2005	Liquid	Fe-55	μCi/cc	2.06E-04	2.12E-04	0.97	Agreement
A17777-162	1st / 2005	Liquid	Sr-89	μCi/cc	1.62E-03	1.63E-03	0.99	Agreement

TABLE C-1

## ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
A17777-162	1st / 2005	Liquid	Sr-90	µCi/cc	1.84E-04	2.06E-04	0.89	Agreement
A18125-162	2nd / 2005	Liquid	Fe-55	µCi/cc	1.38E-03	*		
A18126-162	2nd / 2005	Liquid	Se-89	µCi/cc	1.04E-03	*		
A18126-162	2nd / 2005	Liquid	Sr-90	µCi/cc	9.14E-04	*		
E4599-162	2nd / 2005	Water	H-3	pCi/L	9060	9100	1.00	Agreement
E4600-162	2nd / 2005	Filter	Gross Alpha	pCi	31.9	30.9	1.03	Agreement
E4600-162	2nd / 2005	Filter	Gross Beta	pCi	125	127	0.99	Agreement
E4601-162	2nd / 2005	Filter	Ce-141	pCi/L	59.3	58.9	1.01	Agreement
E4601-162	2nd / 2005	Filter	Cr-51	pCi/L	207	193	1.07	Agreement
E4601-162	2nd / 2005	Filter	Cs-134	pCi/L	59.1	60.6	0.98	Agreement
E4601-162	2nd / 2005	Filter	Cs-137	pCi/L	131	120	1.09	Agreement
E4601-162	2nd / 2005	Filter	Co-58	pCi/L	3.55	3.4	1.04	Agreement
E4601-162	2nd / 2005	Filter	Mn-54	pCi/L	88.6	79.7	1.11	Agreement
E4601-162	2nd / 2005	Filter	Fe-59	pCi/L	40.1	40.7	0.99	Agreement
E4601-162	2nd / 2005	Filter	Zn-65	pCi/L	112	98.8	1.13	Agreement
E4601-162	2nd / 2005	Filter	Co-60	pCi/L	89.4	92.3	0.97	Agreement
E4602-162	2nd / 2005	Filter	Sr-89	pCi/L	90.5	97.5	0.93	Agreement
E4602-162	2nd / 2005	Filter	Sr-90	pCi/L	13.0	12.6	1.03	Agreement
E4603-162	2nd / 2005	Milk	I-131LL	pCi/L	85.7	86.9	0.99	Agreement
E4603-162	2nd / 2005	Milk	I-131	pCi/L	86.8	86.9	1.00	Agreement
E4603-162	2nd / 2005	Milk	Ce-141	pCi/L	96.3	92.4	1.04	Agreement
E4603-162	2nd / 2005	Milk	Cr-51	pCi/L	295	303	0.98	Agreement
E4603-162	2nd / 2005	Milk	Cs-134	pCi/L	87.7	95	0.92	Agreement
E4603-162	2nd / 2005	Milk	Cs-137	pCi/L	186	189	0.98	Agreement

\* - Results submitted to Analytics, pending final report issuance.

**TABLE C-1**

**ANALYTICS CROSS-CHECK PROGRAM SUMMARY**

<b>Sample Number</b>	<b>Quarter / Year</b>	<b>Sample Media</b>	<b>Analyte / Nuclide</b>	<b>Units</b>	<b>Reported Value</b>	<b>Known Value</b>	<b>Ratio E-LAB/ Analytics</b>	<b>Evaluation</b>
E4603-162	2nd / 2005	Milk	Co-58	pCi/L	5.83	5.30	1.10	Agreement
E4603-162	2nd / 2005	Milk	Mn-54	pCi/L	124	125	0.99	Agreement
E4603-162	2nd / 2005	Milk	Fe-59	pCi/L	67	63.9	1.05	Agreement
E4603-162	2nd / 2005	Milk	Zn-65	pCi/L	149	155	0.96	Agreement
E4603-162	2nd / 2005	Milk	Co-60	pCi/L	138	145	0.96	Agreement
E4686-162	3rd / 2005	Water	Gross Alpha	pCi/L	42.3	41.6	1.02	Agreement
E4686-162	3rd / 2005	Water	Gross Beta	pCi/L	128.5	123	1.05	Agreement
E4687-162	3rd / 2005	Water	I-131LL	pCi/L	78.3	78.2	1.00	Agreement
E4687-162	3rd / 2005	Water	I-131	pCi/L	77.2	78.2	0.99	Agreement
E4687-162	3rd / 2005	Water	Ce-141	pCi/L	276.4	282	0.98	Agreement
E4687-162	3rd / 2005	Water	Cr-51	pCi/L	353.7	408	0.87	Agreement
E4687-162	3rd / 2005	Water	Cs-134	pCi/L	137.3	148	0.93	Agreement
E4687-162	3rd / 2005	Water	Cs-137	pCi/L	231.1	235	0.98	Agreement
E4687-162	3rd / 2005	Water	Co-58	pCi/L	72.5	77.0	0.94	Agreement
E4687-162	3rd / 2005	Water	Mn-54	pCi/L	113.2	111	1.02	Agreement
E4687-162	3rd / 2005	Water	Fe-59	pCi/L	74.7	74.0	1.01	Agreement
E4687-162	3rd / 2005	Water	Zn-65	pCi/L	152.3	149	1.02	Agreement
E4687-162	3rd / 2005	Water	Co-60	pCi/L	192.1	202	0.95	Agreement
E4688-162	3rd / 2005	Charcoal	I-131	pCi	61.0	62.7	0.97	Agreement
E4689-162	3rd / 2005	Filter	Gross Alpha	pCi	39.3	38.0	1.04	Agreement
E4689-162	3rd / 2005	Filter	Gross Beta	pCi/L	120.8	112	1.08	Agreement
E4690-162	3rd / 2005	Milk	I-131LL	pCi/L	99.0	94.3	1.05	Agreement
E4690-162	3rd / 2005	Milk	I-131	pCi/L	90.0	94.3	0.95	Agreement
E4690-162	3rd / 2005	Milk	Ce-141	pCi/L	228.5	233	0.98	Agreement
E4690-162	3rd / 2005	Milk	Cr-51	pCi/L	306.3	338	0.91	Agreement
E4690-162	3rd / 2005	Milk	Cs-134	pCi/L	118.3	122	0.97	Agreement

TABLE C-1

## ANALYTICS CROSS-CHECK PROGRAM SUMMARY

Sample Number	Quarter / Year	Sample Media	Analyte / Nuclide	Units	Reported Value	Known Value	Ratio E-LAB/ Analytics	Evaluation
E4690-162	3rd / 2005	Milk	Cs-137	pCi/L	196.5	195	1.01	Agreement
E4690-162	3rd / 2005	Milk	Co-58	pCi/L	64.0	63.4	1.01	Agreement
E4690-162	3rd / 2005	Milk	Mn-54	pCi/L	94.7	92.0	1.03	Agreement
E4690-162	3rd / 2005	Milk	Fe-59	pCi/L	63.3	61.0	1.04	Agreement
E4690-162	3rd / 2005	Milk	Zn-65	pCi/L	121.7	123	0.90	Agreement
E4690-162	3rd / 2005	Milk	Co-60	pCi/L	165.2	167	0.99	Agreement
E4691-162	3rd / 2005	Milk	Sr-89	pCi/L	139.6	146	0.96	Agreement
E4691-162	3rd / 2005	Milk	Sr-90	pCi/L	10.8	11.5	0.94	Agreement
A19215-162	2nd / 2005	Liquid	Fe-55	μCi/cc	1.38E-03	1.34E-03	1.03	Agreement
A19216-162	2nd / 2005	Liquid	Sr-89	μCi/cc	1.04E-03	1.03E-03	0.96	Agreement
A19216-162	2nd / 2005	Liquid	Sr-90	μCi/cc	9.14E-05	9.63E-05	0.95	Agreement
A19666-162	2nd / 2005	Liquid	Fe-55	μCi/cc	2.44E-04	2.34E-04	1.04	Agreement*
A19539-162	3rd / 2005	Liquid	Fe-55	μCi/cc	1.23E-04	1.17E-04	1.05	Agreement
A19540-162	3rd / 2005	Liquid	Sr-89	μCi/cc	3.62E-03	3.71E-03	0.98	Agreement
A19540-162	3rd / 2005	Liquid	Sr-90	μCi/cc	1.99E-04	2.01E-04	0.99	Agreement
A19843-162	4th / 2005	Liquid	Fe-55	μCi/cc	1.30E-04	1.16E-04	1.12	Agreement
A19844-162	4th / 2005	Liquid	Sr-89	μCi/cc	3.38E-03	3.69E-03	0.92	Agreement
A19844-162	4th / 2005	Liquid	Sr-90	μCi/cc	1.88E-04	2.06E-04	0.91	Agreement

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\* - Special Fe-55 sample for CR 05-16 investigation.

**APPENDIX D**  
**COMPARISON OF OPERATIONAL TO PREOPERATIONAL DATA**  
**AND ANALYSIS OF TRENDS**

## Comparison of Operational to Preoperational Data and Analysis of Trends

Unit 1 achieved criticality on June 14, 1967 and was permanently retired from service on November 30, 1992. Unit 2 attained initial criticality on July 26, 1982 and Unit 3 on August 29, 1983.

A variety of environmental samples were analyzed and the analytical results (January 1, 1979 to July 31, 1982) were compared with the 2005 operational data obtained for SONGS Units 2/3, which is the subject post-operational period for SONGS Unit 1.

The following media were evaluated and compared with the operational data of SONGS Units 1, 2 and 3:

- |    |                           |    |                        |
|----|---------------------------|----|------------------------|
| A. | External Radiation        | F. | Ocean Bottom Sediments |
| B. | Air Particulates          | G. | Marine Species         |
| C. | Radioiodine               | H. | Local Crops            |
| D. | Ocean Water               | I. | Soil                   |
| E. | Shoreline Sediment (sand) | J. | Kelp                   |
|    |                           | K. | Drinking Water         |

All of the measurements obtained from the SONGS Unit 1 operational Radiological Environmental Monitoring Program (REMP) during the period from January 1979 to July 1982 are used as the preoperational baseline for SONGS Units 2/3. This is in accordance with San Onofre Units 2/3, Environmental Report, Operating License Stage, Appendix 6A, Pre-operational Radiological Environmental Monitoring, May 31, 1978. Comparisons of preoperational data to 2005 operational data are possible for each of the exposure pathways to man, namely: (1) direct radiation, (2) air particulates (inhalation), and (3) ocean water (waterborne). Comparisons can also be made between preoperational and operational data for ocean bottom sediment data to ascertain if there has been any significant increase in radioactivity in ocean bottom sediments in the vicinity of the SONGS Units 2/3 outfalls.

Overall, the preoperational data are much higher than the operational data. The decrease in radioactivity is due primarily to the cessation of nuclear weapons testing and to the decay of fallout radionuclides. There is a close correlation between indicator and CONTROL data over several decades. See Figures 2A, 3A, 3B, 3C and 4. There are no adverse trends.

### A. Direct Radiation

#### SONGS Unit 1:

No direct radiation data were obtained in the preoperational period of 1964 to 1967 to compare with the operational data.

#### SONGS Units 2/3:

Direct radiation measurements for the SONGS REMP were made quarterly at 38 indicator locations and 11 CONTROL locations in 2005. (See Appendix I for ISFSI TLD data). Direct radiation samples (TLDs) were collected at a number of inner and outer ring locations as



specified by the ODCM. During the preoperational period from January 1979 to July 31, 1982, the indicator stations ranged from 16.1 to 46.6 millirem.

The preoperational indicator average was 25.3. The preoperational CONTROL range was 19.3 to 30.1 and the CONTROL mean was 23.1. During the 2005 operational year for Units 2/3, the routine indicator TLD locations ranged from 10.13 to 29.32 millirem, averaging 17.19 millirem while the CONTROL locations ranged from 12.96 to 20.05 millirem with an average of 16.12 millirem.

Factors such as meteorology, geographic location, the fallout from atmospheric nuclear weapons testing, and seasonal fluctuations account for the variability in the data seen during the preoperational period for each location. The decrease in radiation levels at all TLD sample locations is attributable to the curtailment of the atmospheric nuclear weapons testing, and the continued decay of fission products from previous nuclear weapons tests.

The average direct radiation doses were larger at both indicator and CONTROL locations during the preoperational period than during the 2005 operational period for SONGS Units 2/3. The larger average observed during the preoperational time span may be attributable to Chinese atmospheric nuclear weapons tests on March 14, 1978 and on October 15, 1980. The large average of annual direct radiation levels seen at most TLD sample locations during 1986 and 1987 is attributable to the Chernobyl Nuclear Power Plant accident that occurred April 26, 1986.

Figure 2A compares the environmental radiation levels of selected indicator and CONTROL locations. Simultaneous variation in the radiation levels at both the CONTROL and indicator locations show that the variations are due to factors external to SONGS. The operation of SONGS had no impact on the environment as measured by this sample medium.

## **B. Air Particulates**

### SONGS Unit 1:

Before SONGS Unit 1 attained initial criticality, samples of air particulate gross beta activity were collected from indicator and CONTROL locations. During the preoperational period of 1964-1967, detectable gross beta activity at the indicator locations ranged from 0.030 to 3.810 pCi/m<sup>3</sup>, averaging 0.253 pCi/m<sup>3</sup>. The CONTROL location of Huntington Beach (HBGS) had an average gross beta activity of 0.306 ranging from 0.04 to 2.77 pCi/m<sup>3</sup>. During 2005, the gross beta activity at the indicator locations ranged from 0.0042 to 0.0791 pCi/m<sup>3</sup>, and averaging 0.0239 pCi/m<sup>3</sup>. The Oceanside CONTROL location gross beta activity ranged from 0.0063 to 0.0760 pCi/m<sup>3</sup> with an average of 0.0231 pCi/m<sup>3</sup>. The decrease in activity levels between 1965 and 2005 is ascribed to the curtailment of atmospheric nuclear weapons testing and the resultant decrease in fallout. Refer to figures 3A, 3B and 3C. There was a close correlation between indicator and CONTROL locations in 2005. The operation of SONGS had no impact on the environment as measured by this sample medium.

Valid comparisons of preoperational data to the 2005 postoperational data are difficult to make because the preoperational background levels are elevated by a factor of about ten due to the atmospheric nuclear weapons testing fallout.

### SONGS Units 2/3:

From January 1979 through July 1982 (considered to be the preoperational period for SONGS Units 2/3), there is a period of noticeably higher gross beta activity in air at all sample locations. This period extends from the fourth quarter of 1980 through the fourth quarter of 1981. These higher activity levels are attributable to the Chinese atmospheric nuclear weapons test conducted on October 15, 1980.

Figures 3A, 3B, and 3C compare the monthly average gross beta particulate in air activity levels of selected indicator locations with the CONTROL location over a period of 29 years (January 1976 to December 2005). The data clearly show a close correlation between the indicator and control locations for the entire time period covered. The various spike increases in gross beta activity at all sample locations are closely grouped and timed to coincide with known events external to SONGS with worldwide radiological impact. These events include: Chinese atmospheric nuclear weapons testing on September 17, 1977; March 14, 1978; October 15, 1980; and the April 1986 Chernobyl accident. The graphs (Figures 3A, 3B and 3C) show that the environmental levels of gross beta remained substantially similar at both the indicator and the CONTROL locations over an extended period of time, with both CONTROL and indicator locations showing simultaneous variations of equal magnitude. The fluctuations in gross beta activity are not attributable to SONGS and are the result of other environmental phenomena and seasonal variations.

### **C. Radioiodine**

#### SONGS Unit 1:

No preoperational data are available. All 2005 data were below both the *a priori* LLD (0.07 pCi/m<sup>3</sup>) and the lower, count specific, *a posteriori* MDC.

#### SONGS Units 2/3:

Most of the preoperational and all of the 2005 operational data for I-131 level were below the detection limit.

### **D. Ocean Water**

#### SONGS Unit 1:

No samples were obtained for the preoperational period of SONGS Unit 1.

#### SONGS Units 2/3:

Ocean water samples were collected on a monthly basis in the vicinity of each of the Station discharge outfalls, which served as indicator locations, and from the Newport Beach CONTROL location. The ocean water samples are analyzed for naturally-occurring and station-related gamma-emitting radionuclides. They are composited quarterly and analyzed for tritium.

During the preoperational period, naturally-occurring potassium-40 was detected in each of the samples collected from both indicator and CONTROL locations. Other gamma-emitting radionuclides were detected in only one ocean water sample. In May 1980, Co-58, Co-60, Cs-134, and Cs-137 were detected in an ocean water sample collected from the SONGS Unit 1 outfall. Concentrations of the radionuclides in this sample were 11, 6, 380, and 430 pCi/l, respectively. Tritium was also detected in two of the ocean water samples collected in May 1980 from the SONGS Unit 2 outfall and from the Newport Beach CONTROL location. Reduction in effluent activity through programmatic changes at Unit 1 may have reduced activity levels in ocean water.

For tritium and all SONGS related radionuclides, the data collected at all locations during the 2005 operational period were below both the *a priori* LLD and the lower *a posteriori* MDC. We conclude that the operation of SONGS had no impact on the environment as measured by this sample medium.

#### **E. Shoreline Sediments (Sand)**

##### SONGS Unit 1:

Shoreline sediment samples were not collected during the preoperational period for SONGS 1.

##### SONGS Units 2/3:

Beach sand is collected semiannually from three indicator locations and from a CONTROL location situated at Newport Beach. The samples are analyzed for 26 naturally-occurring and plant-related radionuclides.

To assess the impact of SONGS operations on this environmental medium, preoperational data were compared to 2005 operational data. The radionuclide detected in shoreline sediment in the preoperational time frame was Cs-137 with a range of 0.012 to 0.022 pCi/g, averaging 0.019 in 5 sediment samples. One CONTROL sample with a Cs-137 activity of 0.032 pCi/g was observed in July 1979. The presence of Cs-137 in both CONTROL and indicator locations during the preoperational period leads to the conclusion that the root cause is external to SONGS and is most likely attributable to atmospheric nuclear weapons testing. No SONGS-related radionuclides were detected in shoreline sediment. During the 2005 operational period, thus the impact of SONGS on the environment as measured by the sample medium is considered to be negligible.

#### **F. Ocean Bottom Sediments**

##### SONGS Unit 1:

Ocean bottom sediment samples were not collected during the preoperational phase of Unit 1, and, therefore, no comparison can be made. However, operational data for SONGS 1 did not reveal the presence of any significant radioactivity in the sediment samples.

### SONGS Units 2/3:

During the preoperational and operational periods, representative samples of ocean bottom sediments were collected semiannually from each of the Station discharge outfalls and from a CONTROL station in Laguna Beach. The samples were analyzed for naturally occurring and SONGS related radionuclides. The results of the analyses are listed in Table D-1B.

SONGS-related radionuclides were also detected in samples collected during preoperational period. Manganese-54 (Mn-54) was detected in 5 of the 28 samples. The concentrations of Mn-54 in these samples ranged from 0.015 to 0.49 pCi/g, averaging 0.13 pCi/g. Cobalt-58 (Co-58) was detected in nine samples. The concentration of Co-58 in the samples ranged from 0.013 to 1.16 pCi/g, averaging 0.20 pCi/g. Cobalt-60 (Co-60) was measured in 15 of the 28 samples. The concentration of Co-60 in the sample ranged from 0.014 to 8.1 pCi/g, averaging 0.79 pCi/g. Cs-137 was also detected in 16 of the 28 samples. The concentrations of Cs-137 in the samples ranged from 0.014 to 0.090 pCi/g, averaging 0.039 pCi/g. Cerium-144 (Ce-144) was found in two samples. The concentration of Ce-144 in the samples was 0.06 and 0.26 pCi/g, respectively.

The results indicate that there has not been a build-up of radionuclides with time in ocean bottom sediments near SONGS. The results also indicate notable decrease in the concentrations of plant-related radionuclides in the ocean bottom sediment. Although Co-58, Co-60, and Cs-137 are normally associated with nuclear power operations, preoperational study reveals no accumulation trend for these radionuclides, and no increase in levels for these radionuclides was detected during the operational period.

The concentration of station-related radionuclides in all ocean bottom sediment samples analyzed in 2005 was below the *a priori* LLD. One indicator sample yielded Cs-137 slightly above the *a posteriori* MDC (Unit 2 Outfall,  $11.2E-3$  pCi/g  $\pm$   $6.7E-3$ , MDC  $11.0E-3$  Ci/g). We conclude that operation of SONGS Units 2/3 has had a negligible impact upon this environmental medium.

**TABLE D-1A**  
**SHORELINE SEDIMENTS CONCENTRATION (pCi/g, wet weight)**  
**PREOPERATIONAL AND OPERATIONAL DATA\***  
**SONGS UNITS 2/3**

Radionuclide**	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Cs-137	PreOp	0.012-0.022	0.019	<LLD-0.032	<LLD
All other measured SONGS related radionuclides	PreOp	<LLD	<LLD	<LLD	<LLD
	Operational	<LLD	<LLD	<LLD	<LLD

**TABLE D-1B**  
**OCEAN BOTTOM SEDIMENTS CONCENTRATION (pCi/g, wet weight)**  
**PREOPERATIONAL AND OPERATIONAL DATA\***  
**SONGS UNITS 2/3**

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Mn-54	PreOp	0.0150-0.49	0.129	<LLD	<LLD
Co-58	PreOp	0.013-1.160	0.199	<LLD	<LLD
Co-60	PreOp	0.014-8.100	0.788	<LLD	<LLD
Ag-110m	PreOp	<LLD-0.020	<LLD	<LLD	<LLD
Cs-137	PreOp	0.014-0.090	0.039	<LLD-0.043	<LLD
Cs-137	Operational	<LLD-0.011	<LLD	<LLD	<LLD
Ce-144	PreOp	0.060-0.260	0.160	<LLD	<LLD
All other measured SONGS related radionuclides	PreOp	<LLD	<LLD	<LLD	<LLD
	Operational	<LLD	<LLD	<LLD	<LLD

\* PreOp = January 1979 to July 1982; Operational - January to December 2005  
 \*\* During January to December 2005 all station related Radionuclides from all sample locations were <LLD  
 LLD Lower limits of detection for operational data are listed in Appendix B.

## G. Marine Species (Flesh)

### SONGS Unit 1:

Marine species were not collected during the preoperational period for SONGS Unit 1. No comparison with operational data is possible.

### SONGS Units 2/3:

Non-migratory marine species were collected semi-annually near SONGS to determine the amount of radioactivity that could be consumed by man or that was present in the food chain to man. Marine species caught by the SONGS outfalls and from Laguna Beach include two species of adult fish, crustacea and mollusks. Upon collection, the flesh portion is analyzed for gamma-emitting radionuclides as specified in the ODCM. The results are subsequently reported as pCi/gram wet weight.

Results for several marine species for both the preoperational and 2005 operational periods for Units 2/3 are summarized in Table D-2. The marine species used for purposes of comparison include: sheephead (a fish), black perch (a fish), bay mussel (a mollusk), spiny lobster (a crustacea), and keyhole limpet (a mollusk). Radionuclides analyzed but not included in Table D-2 were below the lower limits of detection for both the preoperational and operational periods.

During the 2005 operational period, no SONGS related radionuclides were detected at either the *a priori* LLD or the lower *a posteriori* MDC. The data indicate no accumulation trends. The operation of SONGS Units 2/3 in 2005 had no impact on the environment as measured by this sample medium.

TABLE D-2

MARINE SPECIES CONCENTRATIONS (pCi/g, wet weight) PREOPERATIONAL AND 2005 OPERATIONAL DATA (SONGS UNITS 2/3)\*

Sheephead Flesh\*\*

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-58	PreOp	0.016-0.030	0.023	<LLD	<LLD
Co-60	PreOp	0.005-0.044	0.017	<LLD	<LLD
Ag-110m	PreOp	<LLD-0.004	<LLD	<LLD	<LLD
Cs-137	PreOp	0.004-0.018	0.007	0.005-0.012	0.007
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related radionuclides	Operational	< LLD	< LLD	< LLD	< LLD

Black Perch Flesh\*\*

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-58	PreOp	0.009-0.011	0.010	<LLD	<LLD
Co-60	PreOp	0.004-0.045	0.017	<LLD	<LLD
Ag-110m	PreOp	0.002-0.009	0.006	<LLD	<LLD
Cs-137	PreOp	0.003-0.015	0.008	0.004-0.014	0.009
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related radionuclides	Operational	< LLD	< LLD	< LLD	< LLD

\* PreOp = January 1979 to July 1982; Operational = January to December 2005

\*\* During January to December 2005 all station related Radionuclides from all sample locations were < LLD

LLD Lower limits of detection for operational data are listed in Appendix B.

TABLE D-2

MARINE SPECIES CONCENTRATIONS (pCi/g, wet weight) PREOPERATIONAL AND 2005 OPERATIONAL DATA (SONGS UNITS 2/3)\*

Bay Mussel Flesh\*\*

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Mn-54	PreOp	0.009-0.025	0.017	<LLD	<LLD
Co-58	PreOp	0.008-0.080	0.028	--	--
Co-60	PreOp	0.005-0.40	0.077	<LLD	<LLD
Cs-137	PreOp	0.003-0.006	0.004	<LLD	<LLD
Ru-103	PreOp	<LLD-0.045	<LLD	<LLD	<LLD
All other measured	PreOp	<LLD	<LLD	<LLD	<LLD
SONGS related radionuclides	Operational	<LLD	<LLD	<LLD	<LLD

Spiny Lobster Flesh\*\*

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-58	PreOp	0.007-0.270	0.086	<LLD	<LLD
Co-60	PreOp	0.014-0.210	0.060	<LLD	<LLD
Cs-137	PreOp	0.005-0.011	0.008	0.040-0.015	0.008
All other measured	PreOp	<LLD	<LLD	<LLD	<LLD
SONGS related radionuclides	Operational	<LLD	<LLD	<LLD	<LLD

\* PreOp = January 1979 to July 1982; Operational = January to December 2005

\*\* During January to December 2005 all station related Radionuclides from all sample locations were <LLD

LLD Lower limits of detection for operational data are listed in Appendix B.



TABLE D-2

MARINE SPECIES CONCENTRATIONS (pCi/g, wet weight) PREOPERATIONAL AND 2005 OPERATIONAL DATA (SONGS UNITS 2/3)\*

Sea Hare Flesh\*\*

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-57	PreOp	0.006-0.017	0.009	<LLD	<LLD
Co-58	PreOp	0.006-12.4	1.233	<LLD	<LLD
Co-60	PreOp	0.016-2.000	0.448	0.003-0.027	0.013
Zn-65	PreOp	<LLD-0.10	<LLD	<LLD	<LLD
Ag-110m	PreOp	0.018-0.50	0.138	0.020-0.039	0.030
Cs-137	PreOp	<LLD-0.004	<LLD	<LLD-0.005	<LLD
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related radionuclides	Operational	---	---	---	---

Keyhole Limpet (Flesh)\*\*

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Co-58	PreOp	0.007-0.101	0.054	<LLD-0.190	<LLD
Co-60	PreOp	0.021-0.040	0.033	<LLD-0.022	0.022
Ag-110m	PreOp	0.033-0.101	0.054	0.005-0.042	0.022
Cs-137	PreOp	<LLD	<LLD	<LLD-0.005	<LLD
All other measured	PreOp	< LLD	< LLD	< LLD	< LLD
SONGS related Radionuclides	Operational	---	---	---	---

\* PreOp = January 1979 to July 1982; Operational = January to December 2005

\*\* Sea Hare and Keyhole Limpet samples were not collected in 2005

LLD Lower limits of detection for operational data are listed in Appendix B.

## H. Local Crops

### SONGS Unit 1:

During the preoperational phase of Unit 1, local crops were collected semiannually from both indicator and CONTROL locations, and subsequently analyzed for Sr-90. The range was 0.008 to 0.030 pCi/g wet weight. The average Sr-90 value was 0.022 pCi/g wet weight. Sr-90 is a common fission product likely due to atmospheric weapons tests.

During 2005, only naturally occurring radionuclides were detected in the crop samples.

### SONGS Units 2/3:

In the preoperational period of January 1979 through July 1982, Sr-90 was detected in the CONTROL samples of kale, parsley, and squash. Naturally occurring K-40 was detected in cucumber, kale, and tomato samples from the indicator and CONTROL locations. Ce-144 and Zr-95 were detected in one sample of parsley at the CONTROL location at concentrations of 0.12 and 0.09 pCi/g, wet weight respectively.

In the 2005 operational period, only naturally occurring radionuclides were detected in the crop samples. The data indicate that the concentration of SONGS related radionuclides have decreased over time in this sample medium. This decrease is attributable to the termination of atmospheric nuclear weapons testing. The operation of SONGS had no impact on the environment as measured by this sample medium.

## I. Soil

### SONGS Unit 1:

No soil data were available for Unit 1 preoperational phase so a comparison cannot be made. However, gamma isotopic analysis of soil does not show any significant level of radioactivity. No accumulation pattern of plant-related radionuclides in the soil has been observed in the last 20 years.

### SONGS Units 2/3:

A comparison of operational and preoperational data does not reveal any accumulation pattern of SONGS related isotopes in soil. The intermittent detection of Cs-137 in both indicator and CONTROL locations is due to residual fallout from atmospheric nuclear weapons testing.

## J. Kelp

### SONGS Unit 1:

Samples of kelp were not collected and analyzed during the preoperational period for SONGS Unit 1. No comparison with operational data is possible.

### SONGS Units 2/3:

Kelp is collected semiannually from three indicator locations and from a CONTROL location situated in Laguna Beach. After collection, the samples are analyzed by gamma-spectral analysis for naturally-occurring and SONGS-related radionuclides.

To assess the impact of SONGS operations on kelp, preoperational data were compared to 2005 operational data in Table D-4. Radionuclides detected during the preoperational period for SONGS Units 2/3 include Mn-54, Co-60, Zr-95, I-131, and Cs-137.

During the 2005 operational period, I-131 was detected in five (5) samples obtained. No other station related isotopes were detected in kelp samples during the 2005 operational period. Figure 4 (I-131 in Kelp) shows a close correlation between indicator and control sample locations over an extended period of time.

Although I-131 activity has been randomly detected in kelp since 1977, there is no evidence that the concentration of I-131 or other station related radionuclides in kelp is increasing near SONGS. I-131 in kelp is most likely due to the sewer release of medical administrations, since it has been detected consistently in CONTROL as well as indicator locations. Since 1988 the concentration of I-131, when detected, has typically been highest at the CONTROL location. These data support the conclusion that during the Units 2/3 operational period, the detection of I-131 in kelp is primarily due to factors external to SONGS.

#### **K. Drinking Water**

No plant related radionuclides were detected during the 2005 operational period. Gross beta activity was detected during both the operational and preoperational periods at both the indicator and the CONTROL locations. No trends have been noted. There is no drinking water pathway for SONGS. The operation of SONGS had no impact on the environment as measured by this sample medium.

**TABLE D-3**

**SOIL PREOPERATIONAL AND OPERATIONAL DATA\* (pCi/g, dry weight)  
SONGS UNITS 2/3**

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Sr-90	PreOp	0.02-0.08	0.044	<LLD-0.03	<LLD
Cs-137	PreOp	0.02-0.20	0.096	<LLD-0.06	<LLD
Cs-137	Operational	<LLD-0.087	<LLD	<LLD	<LLD
All other measured	PreOp	<LLD	<LLD	<LLD	<LLD
SONGS related radionuclides	Operational	<LLD	<LLD	<LLD	<LLD

**TABLE D-4**

**KELP PREOPERATIONAL AND OPERATIONAL DATA\* (pCi/g, wet weight)  
SONGS UNITS 2/3**

Radionuclide	Period	INDICATOR		CONTROL	
		Range	Average	Range	Average
Mn-54	PreOp	<LLD-0.005	<LLD	<LLD	<LLD
Co-60	PreOp	0.006-0.009	0.008	<LLD	<LLD
Zr(Nb)-95	PreOp	0.014-0.090	0.046	0.018-0.053	0.036
I-131	PreOp	0.006-0.024	0.013	0.008-0.030	0.014
I-131	Operational	<LLD-0.078	<LLD	<LLD-0.144	0.080
Cs-137	PreOp	0.004-0.009	0.006	<LLD	<LLD
All other measured	PreOp	<LLD	<LLD	<LLD	<LLD
SONGS related radionuclides	Operational	<LLD	<LLD	<LLD	<LLD

\* PreOp = January 1979 to July 1982; Operational = January to December 2005  
LLD Lower Limit of Detection for operational data are listed in Appendix B.

**APPENDIX E**  
**DEVIATIONS FROM ODCM SAMPLING REQUIREMENTS**  
**IN 2005**

## DEVIATIONS FROM THE ODCM SAMPLING REQUIREMENTS

Deviations from the Offsite Dose Calculation Manual (ODCM) sampling requirements are identified below in accordance with section 5.0 of the ODCM. The performance standard for environmental data collection of 95% was met for all sample types. During 2005, the ODCM specified *a priori* LLD was achieved for all REMP samples obtained. Deviations from the ODCM were associated with external factors not within the control of REMP personnel such as limited availability of marine samples at the locations specified in the ODCM. These minor unavoidable deviations from the ODCM had no meaningful impact on the REMP database and did not compromise the validity of the reported conclusions.

### PART I                    TERRESTRIAL SAMPLING

#### A.      *WEEKLY AIR SAMPLING*

Downtime for each air sampler in 2005 due to weekly sample collection, annual preventive maintenance (PM), and the annual gas meter change out was approximately 46 minutes for each sampler.

Weekly Change out:	Approximately 0.5 minutes x 52 = 26 minutes
Annual PM:	Approximately 15 minutes
Annual Gas Meter change out:	Approximately 5 minutes

Down times in excess of 1 hour are described below for each air sample. Air sampler availability remains well above 95%.

**Air Sampler 1 (City of San Clemente):** No deviations were observed.

**Air Sampler 9 (State Beach Park):** was out of service for 2.8 hours in 2005 due to a power outage.

**Air Sampler 10 (Bluff):** No deviations were observed.

**Air Sampler 11 (EOF):** No deviations were observed.

**Air Sampler 12 (Former SONGS Evaporation Pond):** No deviations were observed.

**Air Sampler 13 (Camp Pendleton East):** was out of service for 9.7 hours during 2005 due to power outages.

**Air Sampler 14 (Mesa Medical Facility):** No deviations were observed.

**Air Sampler 15 (Oceanside CONTROL):** No deviations were observed.

## Summary of Air Sampler Corrective Actions

The useful life of the vacuum pump motor assemblies is estimated to be five years based on the recommendation of the manufacturer and upon experience. If the internal components (motor and control valve) are replaced the useful life may be extended. During 2005 the REMP air samplers experienced no down time attributable to motor or vacuum pump assembly failure.

### ***B. DIRECT RADIATION***

No deviations were observed.

### ***C. LOCAL CROPS***

No deviations were observed.

### ***D. SHORELINE SEDIMENTS***

No deviations were observed.

### ***E. DRINKING WATER***

Drinking water samples were collected late in December 2005. This has been addressed in Action Request 060100156.

### ***F. SOIL***

No deviations were observed.

## **PART II                    MARINE SAMPLING**

### **A.     *NON-MIGRATORY MARINE ANIMALS***

Samples were collected from the specified ODCM sample location when samples were available at that location. When the specified sample type was not available at the ODCM listed location, alternate locations were selected based on sample availability and proximity to the specified sample location. All indicator samples were obtained within two miles of the associated outfall. In some cases the indicator species is not the same as the control species due to limited availability at the indicator location. Most non-migratory marine species samples were not available at the locations specified in the ODCM. All indicator marine animal samples were collected within 2 miles of the Units 2 & 3 discharge diffusers. Adverse diving conditions prevented some of the spring samples from being collected in April 2005; those samples were collected in May 2005 and June 2005.

### **B.     *OCEAN WATER SAMPLING***

No deviations were observed.

### **C.     *OCEAN BOTTOM SEDIMENTS***

No deviations were observed in 2005.

### **D.     *KELP***

Kelp is intermittently available at the various local kelp forests. Sea urchin population, El Nino and La Nina weather phenomena and other macro-environmental factors determine kelp sample availability. Samples were obtained from the kelp canopy closest to the ODCM specified location.



**APPENDIX F**  
**LAND USE CENSUS**

## **INTRODUCTION**

Southern California Edison conducted the annual 2005 Land Use Census (LUC) in accordance with section 5.2 of the Offsite Dose Calculation Manual (ODCM). The purpose of the LUC is to identify important radiological exposure pathways to humans. The LUC identifies the nearest residences, milk animals, meat animals, gardens of at least 500 square feet that produce fleshy or leafy vegetables, and other specified uses (campgrounds, employment, etc.) in each of the meteorological landward sectors within five miles of SONGS. Results are summarized in Table F-1 and F-2 at the end of this appendix.

## **THE STUDY AREA**

The study area includes half of the city of San Clemente (population estimated at 63,100 as of January 1, 2004), the San Clemente State Park, U.S. Marine Corps Base Camp Pendleton (MCB), San Onofre State Beach and Park, the San Clemente Ranch (now known as Seaview Farm), the former U. S. Coast Guard Station at San Mateo Point, and SONGS.

## **METHODOLOGY**

A review of the 2004 LUC and documentation notebook was conducted. Verification and revision of the 2004 data was accomplished by inquiry to the cognizant agency, organization, or individual possessing direct knowledge of the item being verified.

The garden census was performed by examining aerial photographs taken June 19, 2005. The photographic image areas which appeared to correspond to likely garden locations were converted to street addresses. The corresponding residences were observed from the nearest public road to determine if a garden was present. If the entire property was not visible from the street then a garden was assumed to be present.

The closest residence was established in each sector by correspondence with cognizant authorities (City of San Clemente Planning Department and USMC Camp Pendleton). The meat and milk animal survey was performed by contacting the natural resources office on Camp Pendleton, the Orange County Agricultural Commissioner, and the County of San Diego Department of Agriculture. Information on other uses was obtained by contacting the appropriate organizations.

## **DEFINITIONS**

Residence is defined as any structure (single-family house, apartment, mobile home, barracks or similar unit) occupied by individual(s) for three months (2,000 hours) or longer per year. Other Specified Use is defined as a location occupied by members of the general population as other than their primary residence. The use is divided into two categories: employment and non-employment related.

Employment use is defined as a location occupied by members of the general population engaged in normal work activities regardless of the length of time spent at the location, and regardless of its permanence, including concession stands, restaurants, markets and guard shacks.

Non-employment-related use is defined as a location occupied by members of the general population who are not engaged in normal work activities, including campgrounds, temporary housing, time-share condominiums, motels, hotels, schools and beaches.

Milk animals include, but are not limited to cows, goats and sheep, whose milk is used in dairy products for human consumption.

Meat animals include, but are not limited to deer, other game animals, cattle, goats and sheep, whose meat is used for human consumption.

Leafy vegetables include, but are not limited to lettuce, cabbage, collard greens, Bok choy, sorrel, and spinach.

Fleshy vegetables include, but are not limited to tomatoes, cucumbers, cauliflower, squash, beans, zucchini, and sweet corn.

#### **SUMMARY OF CHANGES**

1. Hunting take information has been updated.
2. San Clemente population is 65,338 as of January 1, 2005
3. The maximum possible occupancy was updated for all LUC locations. Updated data are in bold on tables F-1, F-2, and F-3.

**TABLE F-1  
2005 SONGS Units 2/3 LUC Five-Mile Radius Summary Sheet**

Units 2/3 Sector	LUC #	Residence	Miles from Unit 1 Unit 1	Miles from Unit 1 U2/3	Sector	Infant	Child	Teen	Adult	Estimated Hours of Maximum Occupancy
A	R-A1	Camp San Mateo	3.5	A	3.6	0	0	0	X	FTR
	R-A2	SONGS Camp Mesa	0.3	B	0.4	X	X	X	X	2,928
B										
C	R-C2	Camp San Onofre Fire Station	2.4	C	2.4	0	0	0	X	2,756
	R-C1	Camp San Onofre	2.7	C	2.6	0	0	0	X	FTR
D	R-D1	Camp San Onofre Barracks	3.0	D	3.0	0	0	0	X	FTR
E	R-E1	Camp Horno Barracks	4.2	E	4.1	0	0	0	X	FTR
F										
G										
H										
J										
K	No land uses, these sectors are primarily the Pacific Ocean and contain only a small portion of the pl									
L										
M										
N										
P	R-P3	San Onofre Rec Beach (SORB)	0.8	Q	1.0	0	0	0	X	FTR
	R-P4	SORB Resident	1.3	Q	1.5	0	0	0	X	FTR
	R-P2	San Mateo Point Housing	2.5	P	2.7	X	X	X	X	FTR
	R-P1	Cotton Point Estates	2.6	P	2.8	X	X	X	X	FTR
Q	R-Q5	SORB Resident Employee	0.9	Q	1.1	0	0	0	X	FTR
	R-Q4	SORB Resident Employee	0.9	Q	1.1	0	0	0	X	FTR
	R-Q2	San Onofre Mobile Homes	1.2	Q	1.4	X	X	X	X	FTR
	R-Q3	San Mateo Point Housing	2.5	Q	2.7	X	X	X	X	FTR
R	R-R2	SONGS Camp Mesa	0.4	A	0.4	X	X	X	X	2,928
	R-R3	SONGS Dry Camping PL12	0.6	Q/R	0.7					0
	R-R1	San Onofre Mobile Homes	1.2	R	1.3	X	X	X	X	FTR

FTR – Full Time Residence

Bolt Text indicates changes from 2004 LUC

**TABLE F-2**  
**2005 SONGS Units 2/3 LUC Five-Mile Radius Summary Sheet**

Units 2/3 Sector	Gardens				Meat				Deer Consumption In 2005 (July 2004 - July 2005)		
	LUC #	Gardens	Miles from Unit 1	Unit 1 Sector	Miles from U2/3	LUC #	Aminals	Miles from Unit 1		Unit 1 Sector	Miles from U2/3
A						M-A2	Deer (Bravo 2)	4.1	A	4.2	0
						M-A1	Deer (Bravo 3)	1.7	A	1.6	3
B						M-B2	Deer (Bravo 2)	3.8	B	3.8	0
						M-B1	Deer (Bravo 3)	1.6	B	1.6	3
C						M-C1	Deer (Alpha 2)	1.1	C	1.0	1
D						M-D1	Deer (Alpha 2)	1.0	D	0.8	1
E						M-E1	Sheep	5.2	E	5.0	0
						M-E2	Deer (Alpha 2)	1.0	E	0.8	1
						M-E3	Deer (Romeo 3)	1.6	E	1.4	0
						M-E4	Deer (Romeo 2)	2.8	E	2.6	0
						M-E5	Deer (Romeo 1)	1.2	E	1.0	2
F						M-F1	Sheep	5.2	F	5.0	0
						M-F1	Deer (Papa 2)	5.2	F	5.0	3
						M-F2	Deer (Romeo 3)	1.7	F	1.5	0
G											
H											
J											
K											
L											
M											
N											
P	G-3	Cotton Point Estat	2.6	P	2.8						
Q	G-2	Sunrise Growers	2.0	Q	2.2						
	G-8	2240 Ave Salvado	3.9	Q	4.1						
	G-5	1706 S Ola Vista	4.2	Q	4.4						
	G-6	1315 S Ola Vista	4.4	Q	4.6						
	14	Inactive - 3 W Ave San Antonio	4.1	Q	4.3						
	16	Inactive - 147 W Junipero	3.9	Q	4.1						
R	G-10	SONGS Garden	0.3	B	0.4	M-R1	Deer (Bravo 3)	1.6	R	1.8	3
	G-1	Sunrise Growers	2.2	R	2.3						

FTR – Full Time Residence

Bolt Text indicates changes from 2004 LUC

**TABLE F-3**  
**2005 SONGS Units 2/3 LUC Five-Mile Radius Summary Sheet**

Units 2/3 Sector	LUC #	Other Specified Uses	Miles from Unit 1	Unit 1 Sector	Miles from U2/3	Estimated Hours of Maximum Occupancy
A	O-8	Camp San Mateo Motor Pool	3.5	A	3.6	1,920
	24	Cristianitos Fire Station	4.8	A	5.0	3,456
	22	SCE Land Uses	0.3	B	0.4	--
B	O-9	USMC CP Sanitary Land Fill	2.1	B	2.1	2,500
	27	USMC CP Ammunition Dump	4.6	B	4.6	--
C	O-10	Camp San Onofre (STP #11)	2.3	C	2.2	2,000
D	O-4	Camp Horno (STP #10)	3.8	D	3.7	100
E	O-5	Camp Horno Motor Pool	4.2	E	4.0	1,920
	29	Camp Horno Truck Company			4.7	No Use
F	O-1	San Onofre State Beach Guard Shack	1.0	F	0.8	1,500
	O-2	San Onofre Beach Campground	1.1	F	0.9	2,928
	31A	Border Patrol Checkpoint (NB)	2.2	F	2.0	2,500
	31B	Hwy Patrol Weigh Sta (NB)	2.3	F	2.1	2,112
G	O-2	San Onofre Beach Campground	1.1	G	0.9	720
	32	Hwy Patrol Weigh Sta (SB)	2.3	G	2.1	2,112
H						
J						
K						
L						
M						
N						
P	O-6	Surf Beach (Lifeguard)	0.4	P	0.5	800
	1A	SORB Campground Checkin	1.2	Q	1.4	2,000
	1B	Mini-Exchange (SORB)	1.2	Q	1.4	0
	2	SORB Guard Shack	1.4	Q	1.6	0
	3	Trestles Beach Lookout Tower	1.6	P	1.8	500
Q	O-3	State Park Office Trailer	0.5	Q	0.6	2,000
	5	Surf Beach Guard Shack	0.5	Q	0.7	1,500
	33	Military Beach Campground & Cottages	0.9	Q	1.1	FTR
	7	SORB Clubhouse	1.0	Q	1.2	80
	18	SORB Lifeguard Tower	1.1	Q	1.3	2,000
	8	USMC Exchange & Commissary	1.5	Q	1.7	2,000
	9	Basilone Road USMC Entry Gate	1.8	Q	2	1,248
	O-11	Sunrise Growers Field Workers	2	Q	2.2	2,880
	10	Sunrise Growers Administrative Offices	2.4	Q	2.6	2,880
12	San Mateo Campground	2.7	Q	2.9	4,380	
11	State Park Main Offices	3.3	Q	3.5	FTR	
13	Beach Concession	3.7	Q	3.9	2,000	
17	Beach Concession	4.7	Q	4.5	500	
R	O-7	Sunrise Growers Packing & Shipping	2.4	R	2.6	2,880
	O-12	Sunrise Growers Field Workers		R	2.3	2,880
	19	Camp San Mateo (STP #12)	3.5	A	3.7	2,000
	21	Cristianitos USMC Entry Gate	3.9	R	4.0	1,248
	23	Cristianitos USMC Gas Station	4.0	A	4.1	2,000
20	Sea Ridge Estates	4.4	R	4.5	FTR	

FTR – Full Time Residence

Bolt Text indicates changes from 2004 LUC

**APPENDIX G**  
**FIGURES FOR 2005**

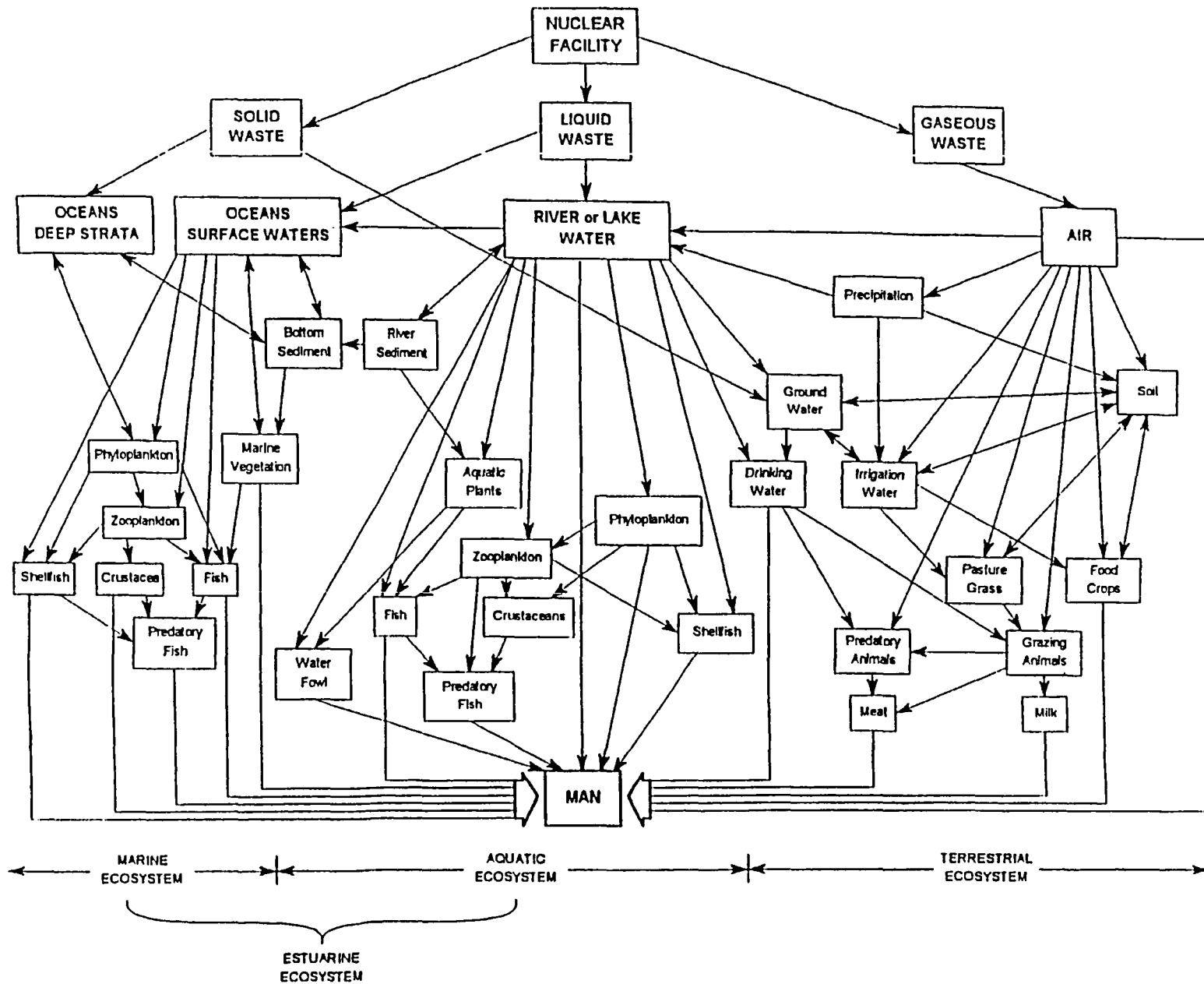


Figure 1. Potential Radiation Exposure Pathways Leading to Man



**Direct Radiation Monitoring**  
**Quarterly Environmental TLD dose measurements in mR**  
**Selected TLDs located very close to SONGS vs. Selected CONTROL TLDs**

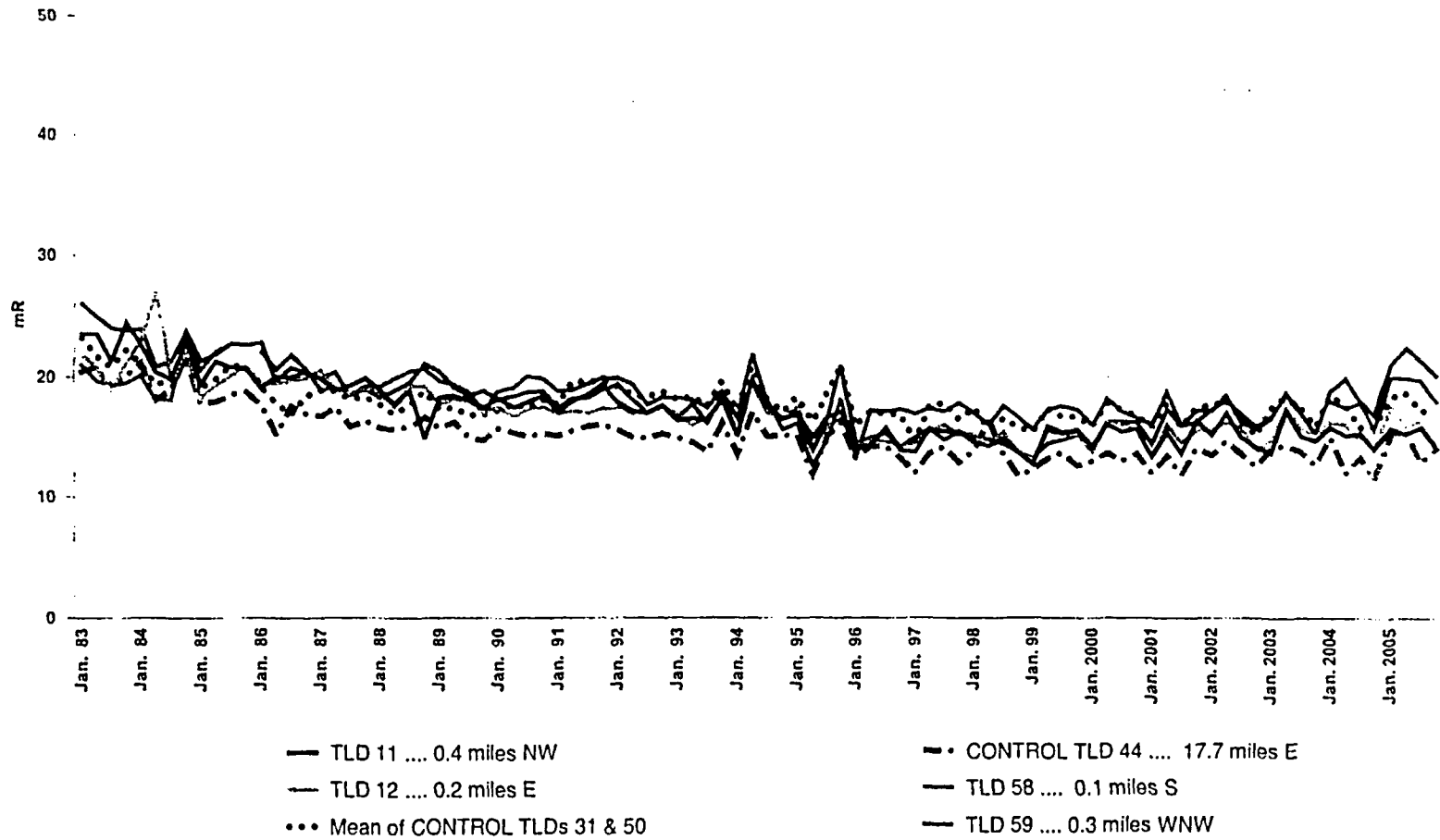
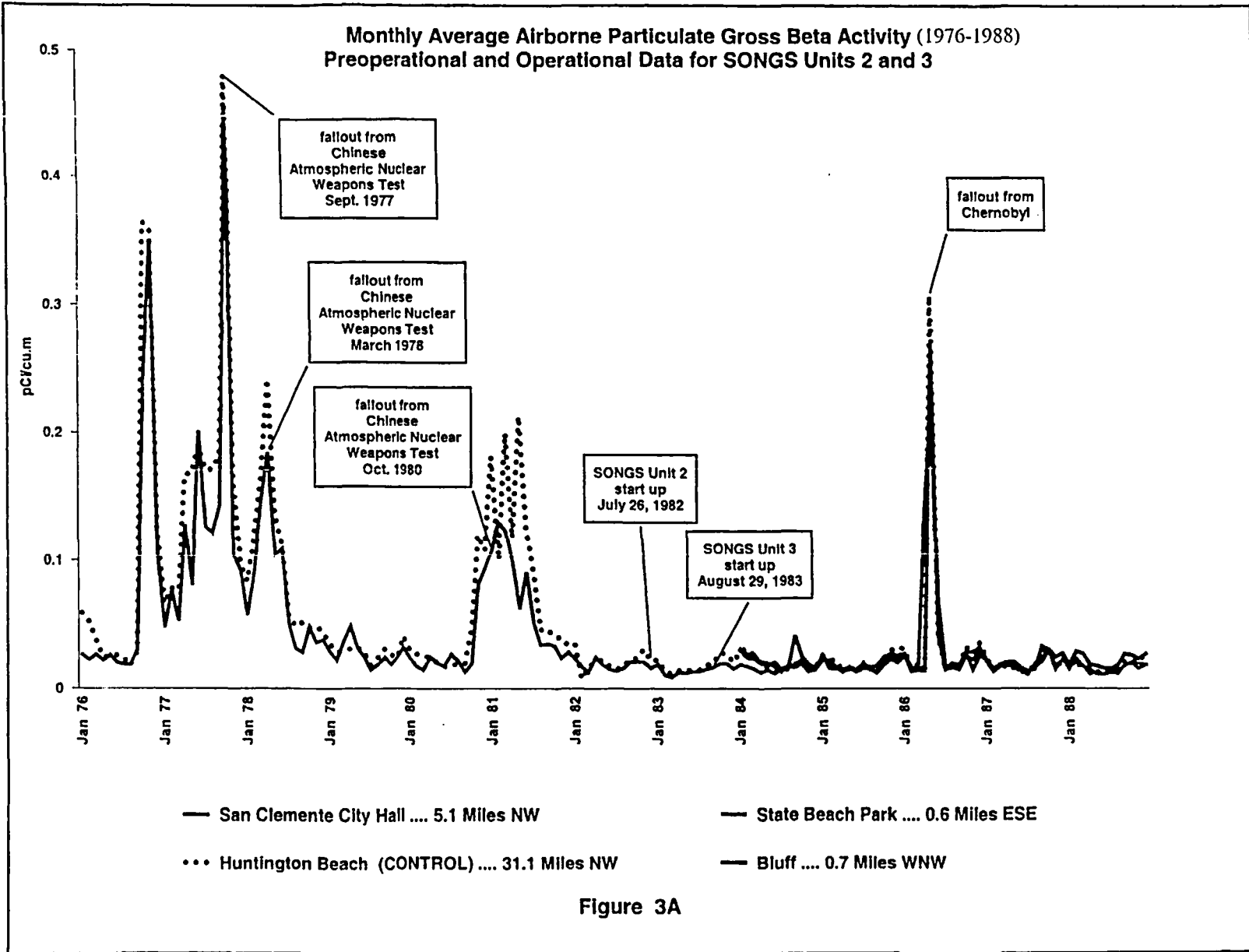


Figure 2A



Monthly Average Airborne Particulates Gross Beta Activity  
SONGS Units 2 and 3 from January 1988 to December 1997

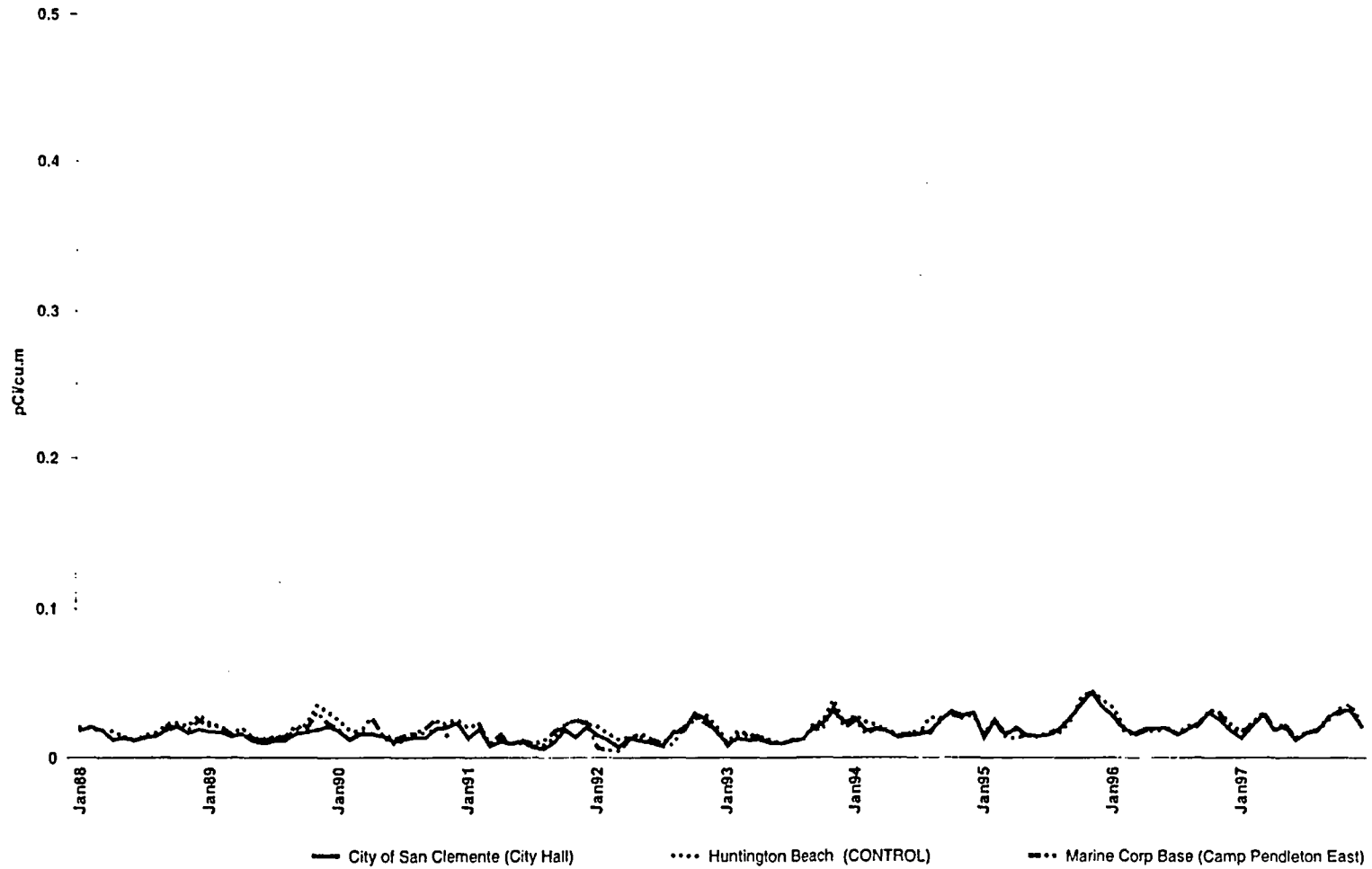


Figure 3B

Monthly Average Airborne Particulates Gross Beta Activity SONGS Units 2 and 3  
January 1998 to December 2005

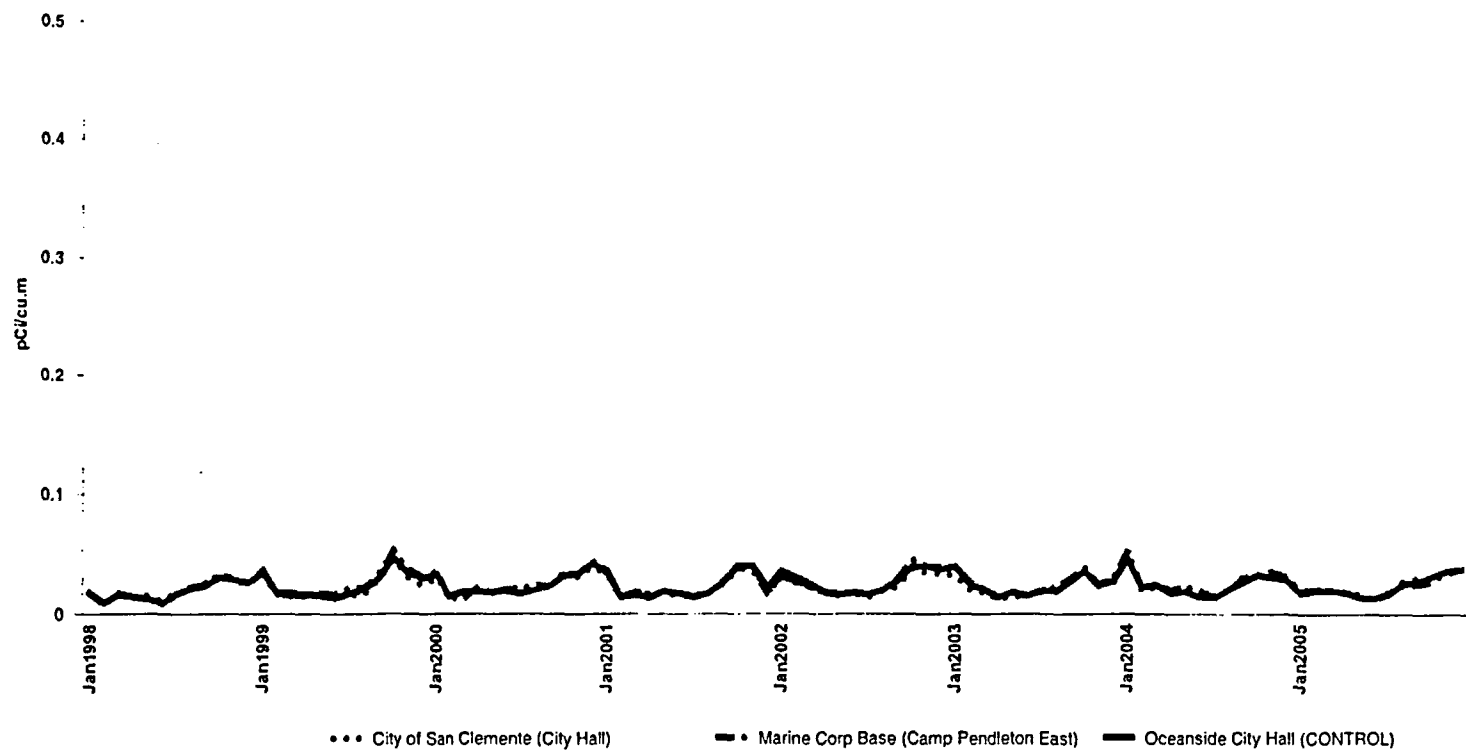


Figure 3C

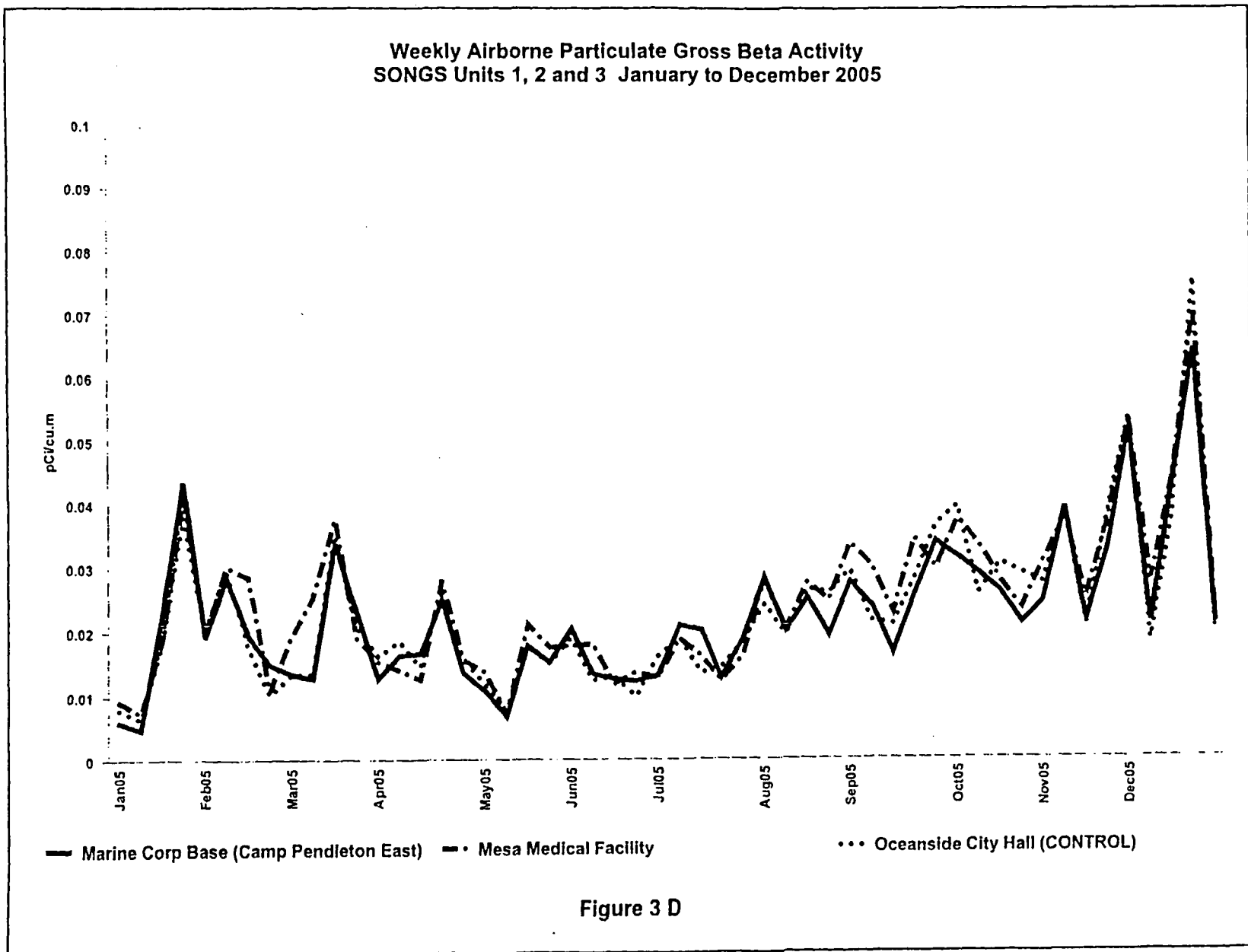
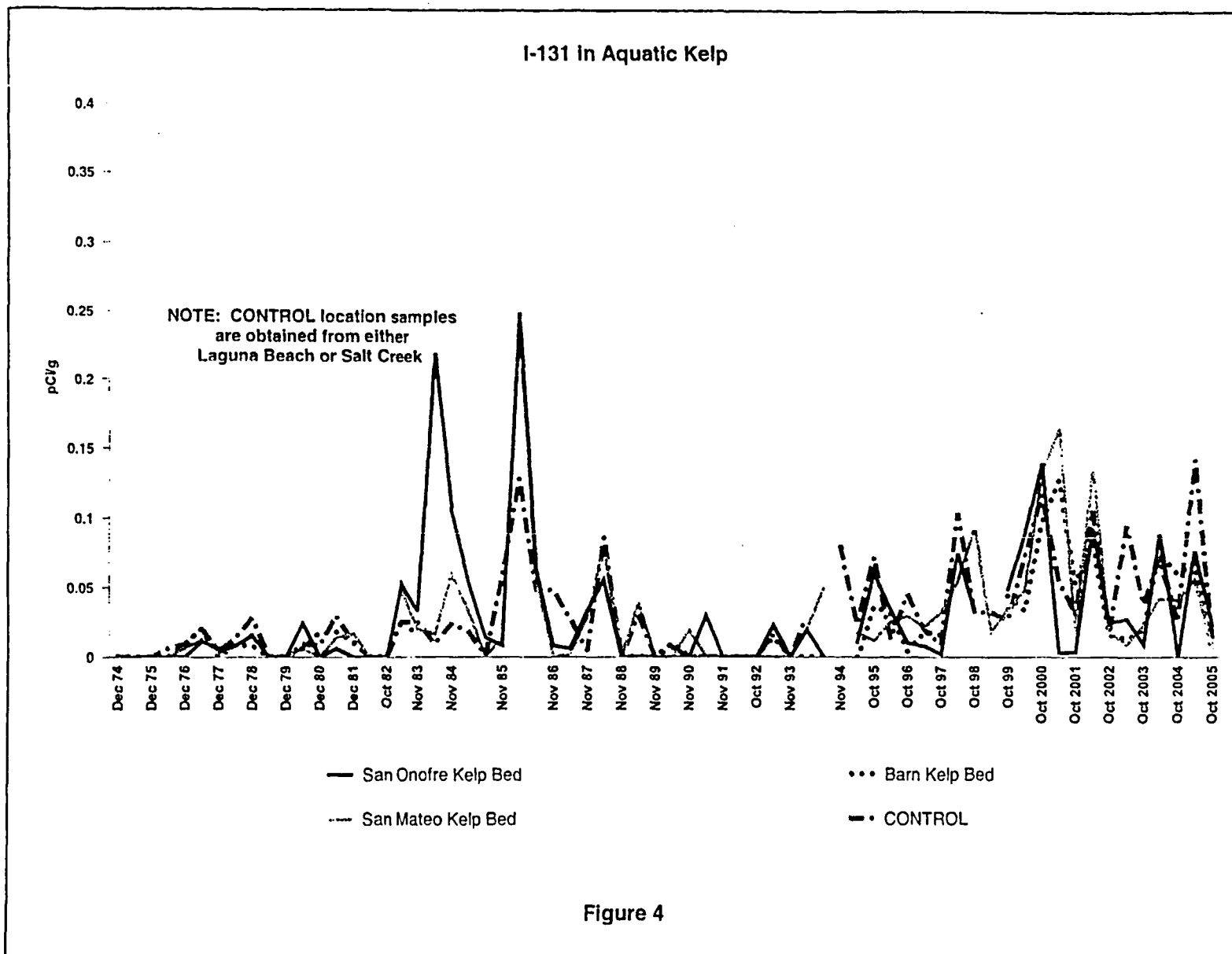


Figure 3 D



**APPENDIX H**  
**ERRATA TO THE 2004 AREOR**

All data required by the ODCM in 2004 was reported in the 2004 AREOR. There are no errata to be appended to the 2004 AREOR.

**APPENDIX I**

**REMP TLDs CO-LOCATED WITH DHS TLDs DURING 2005**



## APPENDIX I

### REMP TLDs CO-LOCATED WITH DHS TLDs DURING 2005

Requirements in the standard Technical Specifications adopted under the Technical Specifications Improvement Program include reporting results of those thermoluminescent dosimeters (TLDs) that are co-located with NRC dosimeters. The NRC no longer deploys TLDs in the environs of SONGS. Some SCE TLDs are located adjacent to the former NRC TLD locations and these SCE TLDs are listed below.

The DHS (Department of Health Services) also maintains a TLD program in the environs of SONGS. The DHS direct radiation monitoring program uses Landauer TLDs.

The below listed quarterly TLD data is from the SCE & DHS TLD programs. The NRC location numbers refer to the locations in the old NRC program.

Location Number	Location Name	2005 Data from SCE TLDs			
		1st Qtr	2nd Qtr	3rd Qtr	4th Qtr
SCE -1 , NRC -7, DHS #2	San Clemente	18.90	18.34	16.86	16.88
SCE -2, NRC -23, DHS #8	Camp San Mateo	19.83	18.48	17.5	17.69
SCE -3, NRC -19, DHS #9	Camp San Onofre	17.62	17.03	14.77	15.34
SCE -6, DHS #10	Old Route 101 (East-Southeast)	12.21	11.71	10.42	10.13
SCE 10, NRC -12, DHS #6	San Onofre Surfing Beach	17.41	16.21	16.28	15.98
SCE 16, DHS #7*	ESE Site boundary	22.12	18.18	17.20	16.16
SCE 22, NRC 11, DHS #4	Coast Guard Station	18.9	17.96	18.18	17.19
SCE -34, NRC -14, DHS #5	San Onofre Elementary School	17.65	16.58	16.21	15.62
SCE 41, NRC 25, DHS #11**	Old Route 101 (Unit 3)	16.66	17.04	15.45	14.47
SCE 50, NRC 32, DHS #13	Oceanside Fire Station	17.98	17.82	16.62	16.43

\* SCE 16 is approximately 15 meters from DHS 7. DHS 7 is across Basilone Rd.

\*\* SCE 41 is approximately 120 meters from DHS 11. Results included per DHS request.

## **Appendix J**

### **ISFSI (Independent Spent Fuel Storage Installation) TLD Data**

## **ISFSI (Independent Spent Fuel Storage Installation) TLD Data**

Per 10 CFR 72.126, SONGS implemented an environmental TLD program in the vicinity of the ISFSI. In the fourth quarter of 2001, 21 pre-operational TLDs were deployed in the area around the ISFSI foundation then under construction. The pre-operational TLDs data are compared to the data obtained after the commencement of spent fuel storage in the ISFSI for the purposes of estimating the additional dose potentially attributable to the operation of the ISFSI.

Environmental dose rates are variable. The REMP TLD data show a seasonal variability that does not appear to be related to any activities at SONGS. Data from the REMP indicator and CONTROL TLDs increase and decrease in a synchronous manner. The data support the conclusion that macro-environmental factors are the causative agents for the variations. Refer to Figure 2a and 2b. The ISFSI TLD data gathered to date appears to follow a similar seasonal variability. Refer to Figures 6-1, 6-2, and 7a. In addition to environmental factors some non-ISFSI work activities at Unit 1 have elevated the pre-operational measured ISFSI TLD dose. The storage and transport of radioactive materials and waste near the location of the ISFSI foundation area in 2001 and 2002 appears to have elevated the dose rates of TLDs 306 to 315. In addition, the removal of the Unit 1 reactor vessel in October 2002 caused a noticeable increase in the measured dose for TLDs 301 to 315. Refer to Tables J-1 and J-2 which list all the REMP and ISFSI TLD data within the 10 CFR 72 Controlled Area Boundary and the 10 CFR 50 EAB (Exclusion Area Boundary).

The TLDs close to the ISFSI foundation (TLDs 306 to 315) all showed a decrease in measured dose after the commencement of spent fuel storage in the ISFSI. Refer to Table J-1. This decrease in measured dose may be attributable to the aforementioned seasonal variability of environmental dose rates or it may be attributable to the decrease in non-ISFSI radioactive material work activity in the Unit 1 area.

In the first quarter 2004, 3 TLDs were placed on the perimeter fence 15 meters SW of the ISFSI module. These TLDs (336, 337, and 338) showed the highest measured dose in 2005. The closest publicly accessible location SW of the ISFSI is the San Onofre Beach access road. The TLDs located along the access road measured a dose indistinguishable from background in 2005.

We conclude that dose attributable to the storage of spent fuel in the ISFSI is not measurable beyond the immediate area of the ISFSI and is well below regulatory limits. We further conclude that dose to a member of the general public attributable to all SONGS related radiological activities at the EAB is below 10 CFR 72.104 limits.

**TABLE J-1  
ISFSI TLD DATA**

ISFSI TLD Number Location	2001	2002				2003				2004			
	4 <sup>th</sup> Qtr	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr (1)	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr (2)	4 <sup>th</sup> Qtr	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr
TLD 301 (3)	17.3	18.42	17.91	18.51	24.56	17.23	18.47	17.09	17.39	18.86	18.0	17.7	15.49
TLD 302 (3)	20.28	20.67	19.59	19.46	125.78	20.32	20.77	19.3	21.97	23.57	26.37	20.02	19.11
TLD 303 (3)	18.96	18.82	18.26	18.11	156.89	20.45	25.74	26.56	27.06	28.54	29.98	24.59	24.72
TLD 304 (3)	18.06	19.1	18.28	17.95	64.53	19.57	28.34	33.25	31.8	34.72	33.22	29.74	28.44
TLD 305 (3)	18.99	20.49	19.68	19.82	147.33								
TLD 306 (3)	17.23	18.56	16.91	17.07	29.6	19.03	19.75	17.3	17.27	18.85	17.31	15.7	16.08
TLD 307 (3)	17.34	19.61	17.68	17.36	23.35	24.07	20.3	16.24	16.82	18.07	17.62	15.53	15.11
TLD 308 (3)	18.75	20.11	18.9	18.68	27.22	21.82	21.31	18.35	18.73	20.55	21.72	18.11	15.82
TLD 309 (3)	18.74	23.09	23.43	24.43	30.53	21.78	20.49	18.44	16.85	20.15	21.44	18.72	17.34
TLD 310 (3)	19.79	25.82	23.47	21.49	25.8	20.74	19.05	18.96	17.59	21.17	21.28	18.19	17.15
TLD 311 (3)	21.29	29.93	25.33	26.43	26.61	25.24	23.59	21.8	19.99	19.06	20.43	18.04	17.52
TLD 312 (3)	21.86	34.08	28.45	30.07	26.45	28.46	27.71	19.88	16.15	15.5	13.87	15.23	13.35
TLD 313 (3)	24.95	36.84	28.78	26.49	25.44	25.78	26.34	25.6	23.4	22.87	21.14	20.68	20.0
TLD 314 (3)	20.67	22.28	20.15	19.58	18.8	19.74	20.23	19.3	19.85	18.84	19.06	17.68	15.83
TLD 315 (3)	23.37	25.7	22.77	22.58	20.82	24.06	23.18	22.77	21.49	20.89	21.36	19.26	18.13
TLD 316 (4)	16.96	18.81	17.83	16.29	18.01	16.72	17.76	16.01	14.97	16.68	19.06	15.15	14.45
TLD 317 (4)	18.07	19.87	20.62	17.95	18.43	16.86	18.82	17.12	16.02	17.41	17.51	16.96	14.94
TLD 318 (4)	17.86	18.91	19.59	18.4	18.3	17.62	19.01	17.72	16.95	18.15	18.31	16.34	16.37
TLD 319 (4)	17.78	19.76	20.01	19.02	18.35	19.14	19.54	18.57	15.88	17.22	19.19	16.48	16.54
TLD 320 (4)	17.83	19.39	19.11	18.34	18.25	17.78	19.41	17.8	16.94	16.36	19.18	16.34	15.93
TLD 321 (4)	18.52	19.84	20.45	18.67	19.41	19.83	21.1	18.46	17.82	18.89	20.8	16.92	15.5
TLD 336										39.12	31.35	30.77	24.63
TLD 337										36.03	49.65	65.77	47.51
TLD 338										45.83	38.84	36.06	30.27

- (1) Large Component Removal and start of the long term storage of the Unit 1 Reactor Vessel.
- (2) Fuel loaded into the ISFSI pad September 2003.
- (3) These TLDs are in an area where radiological materials have been stored or transported.
- (4) These TLDs are not in the proximity of radiological activities.

**TABLE J-1  
ISFSI TLD DATA**

ISFSI TLD Number Location	2005			
	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr (1)
TLD 301 (3)	22.05	33.23	31.2	27.44
TLD 302 (3)	31.04	45.99	41	40.43
TLD 303 (3)	33.14	49.45	41.54	38.53
TLD 304 (3)	34.63	42.62	41.1	37.05
TLD 306 (3)	19.92	20.4	20.44	19.24
TLD 307 (3)	20.26	24.94	22.08	20.98
TLD 308 (3)	21.81	25.3	23.88	23.1
TLD 309 (3)	22.1	20.61	19.53	18.14
TLD 310 (3)	20.66	20.91	21.08	20.26
TLD 311 (3)	21.85	20.94	20.61	19.35
TLD 312 (3)	16.88	15.67	15.57	13.81
TLD 313 (3)	26.97	26.36	26.45	25.93
TLD 314 (3)	21.79	20.26	20.83	20.05
TLD 315 (3)	22.84	20.28	20.61	19.65
TLD 316 (4)	19.02	18.62	19.7	19.5
TLD 317 (4)	20.04	21.48	21.19	19.89
TLD 318 (4)	21.56	19.82	19.23	18.44
TLD 319 (4)	20.94	19.42	19.02	18.13
TLD 320 (4)	21.89	19.91	20.42	19.54
TLD 321 (4)	21.34	20.15	20.83	20.12
TLD 336	39.5	63.71	67.54	73.3
TLD 337	54.46	64.07	59.43	68.36
TLD 338	40.18	44.51	42.75	46.49

- (1) Large Component Removal and start of the long term storage of the Unit 1 Reactor Vessel.
- (2) Fuel loaded into the ISFSI pad September 2003.
- (3) These TLDs are in an area where radiological materials have been stored or transported.
- (4) These TLDs are not in the proximity of radiological activities.

**TABLE J-2  
REMP TLDs WITHIN THE EAB**

ISFSI TLD Number Location	2001				2002				2003				2004			
	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr (1)	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr (2)	4 <sup>th</sup> Qtr	1 <sup>st</sup> Qtr	2 <sup>nd</sup> Qtr	3 <sup>rd</sup> Qtr	4 <sup>th</sup> Qtr
11	13.61	15.63	13.89	16.57	15.39	17.2	15.17	14.38	13.89	17.43	15.29	14.93	16.02	15.35	15.52	14.26
12	13.59	16.28	14.81	15.79	15.75	16.4	16.01	13.93	14.96	17.64	16.04	15.19	16.49	16.25	15.01	14.22
13	28.13	33.16	38.84	31.06	31.03	37.64	38.2	22.62	27.26	28.38	33.11	21.08	21.67	20.34	22.45	22.84
15	15.63	18.37	16.07	17.76	17.32	20.82	16.79	15.63	16.52	19.11	15.44	16.36	17.37	16.23	19.52	16.95
16	17.46	18.16	19.61	17.66	17.14	18.25	17.91	13.61	15.04	18.48	17.77	15.53	19.27	17.62	16.31	15.37
41	13.51	16.47	14.3	14.63	15.24	17.41	15.13	13.32	15.98	16.41	14.32	15.03	16.26	14.45	14.85	13.85
55	17.11	19.37	15.93	18.98	20.11	19.89	17.67	17.84	18.08	19.86	18.04	18.2	20.06	16.67	18.67	16.72
56	16.39	19.17	15.57	18.77	18.11	20.12	17.31	17.05	17.84	19.71	17.11	17.26	19.12	17.63	17.63	16.69
57	15.88	18.51	16.29	19.19	17.96	19.09	16.03	15.8	16.18	17.44	16.69	15.85	17.8	16.64	15.56	16.69
58	16.29	18.97	16.22	17.45	17.4	18.65	16.39	15.88	16.75	18.94	17.39	(3)	18.17	17.66	18.08	15.88
59	14.65	17.56	16.14	16.54	17.45	18.31	17.12	16.11	16.88	18.79	17.23	15.51	19.0	20.07	18.18	17.08
73	22.97	25.29	22.41	22.71	22.94	23.48	24.9	21.47	22.1	23.91	22.53	22.47	23.02	22.02	23.64	20.67

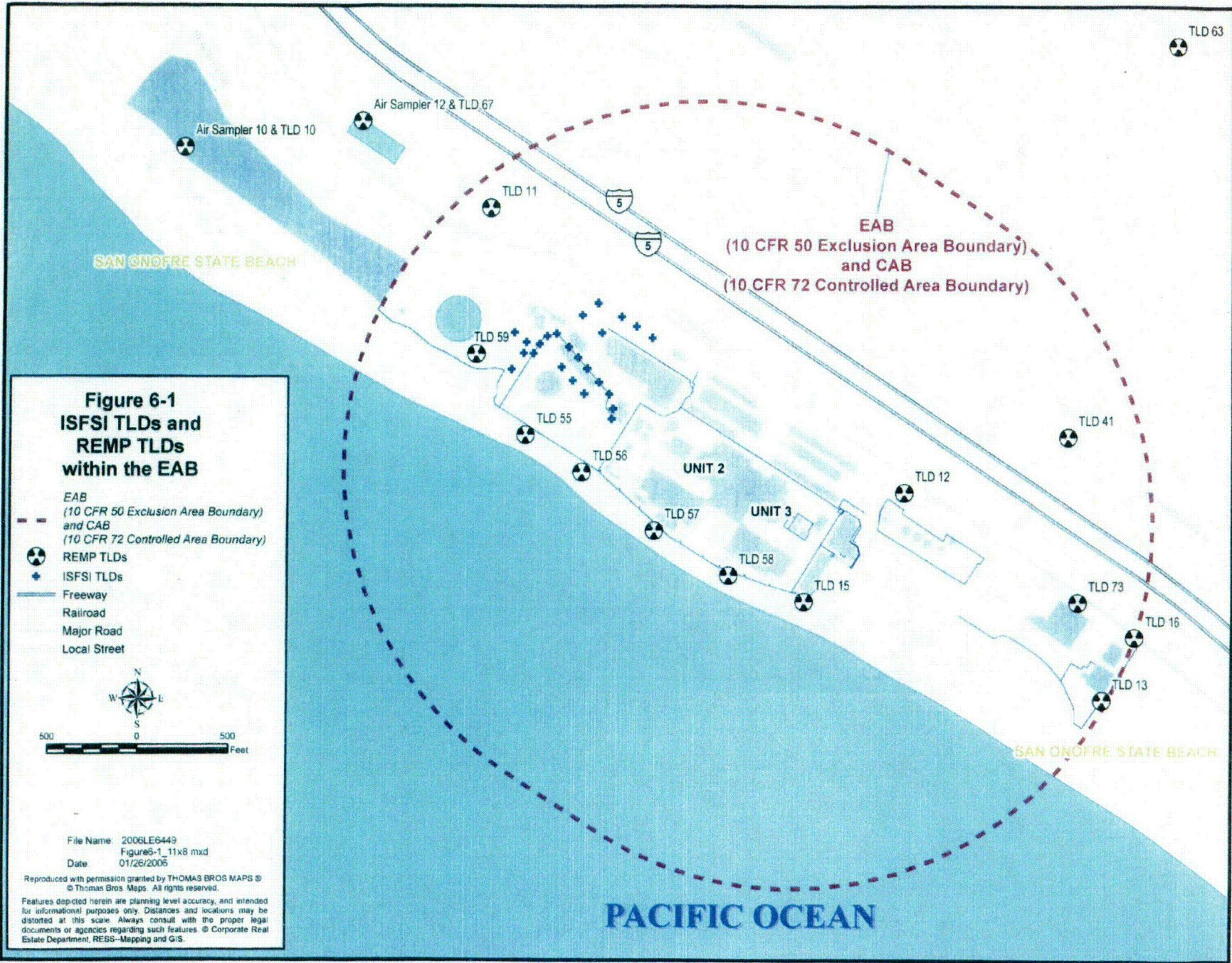
(1) Large Component Removal and the start of the long term storage of the Unit 1 Reactor Vessel.

(2) Spent Fuel Storage started at the ISFSI

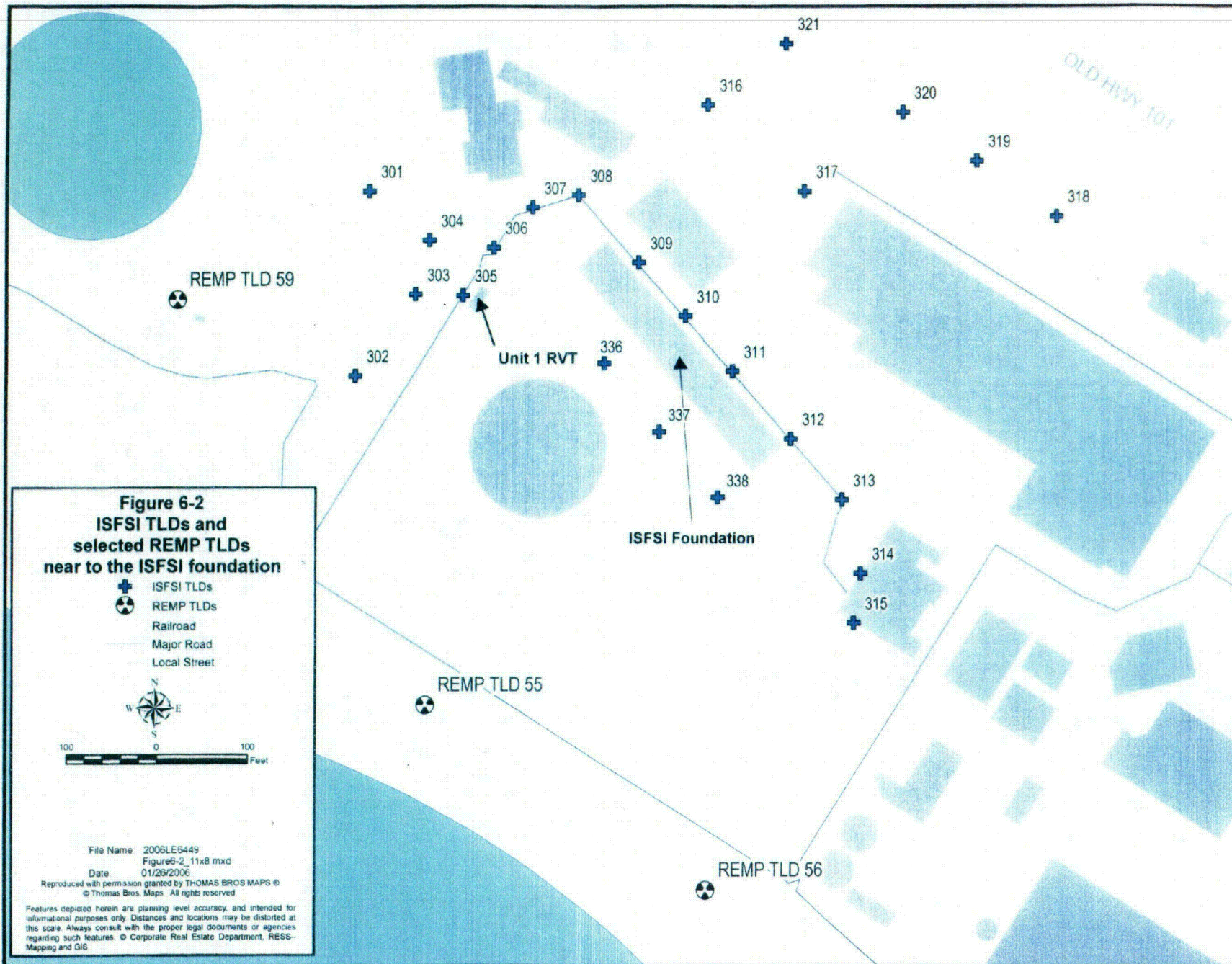
(3) TLD damaged; no data available.

**TABLE J-2  
REMP TLDs WITHIN THE EAB**

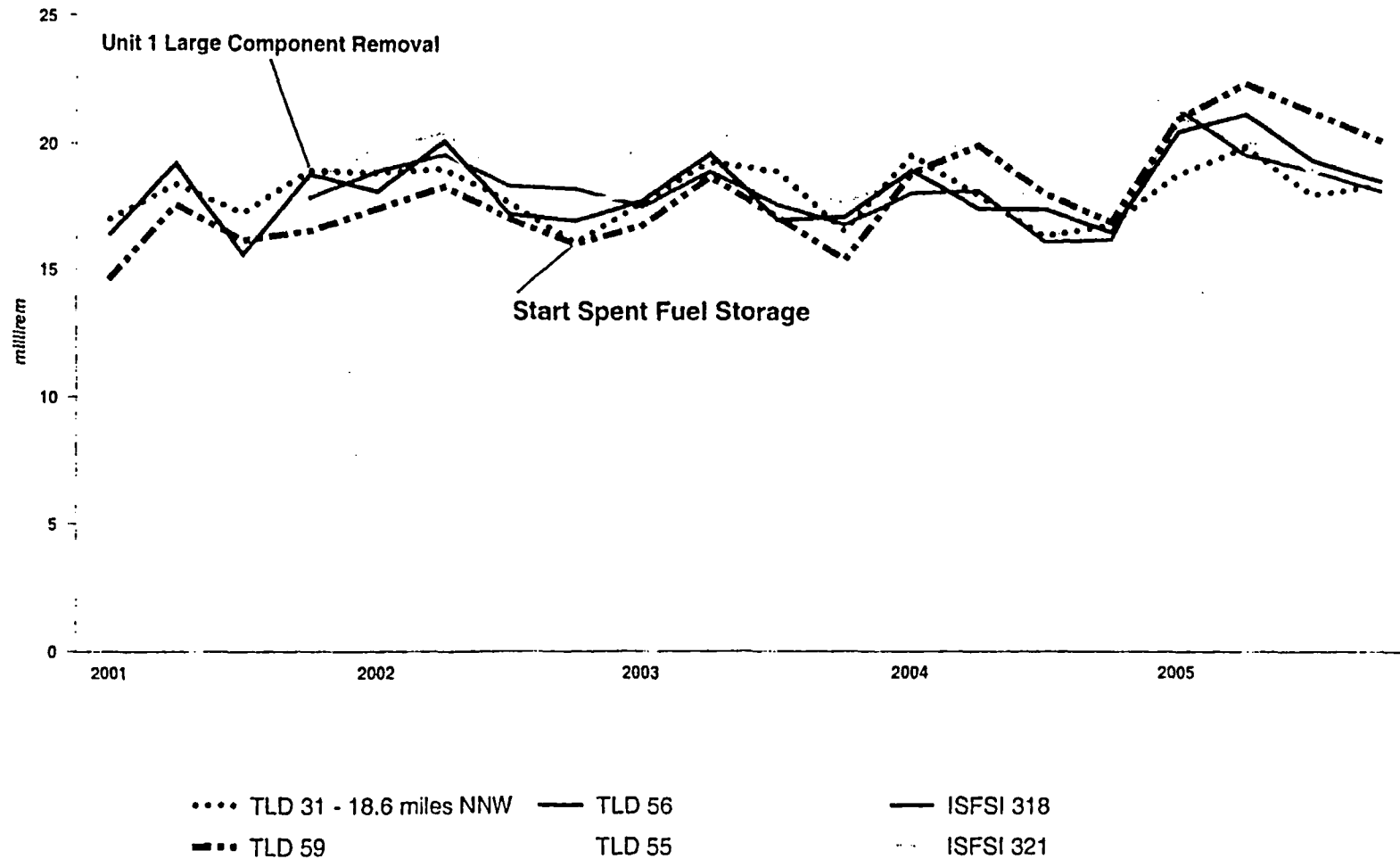
ISFSI TLD Number Location	2005			
	1 <sup>st</sup> Otr	2 <sup>nd</sup> Otr	3 <sup>rd</sup> Otr	4 <sup>th</sup> Qtr
11	15.96	15.49	16.04	14.38
12	17.79	16.14	16.59	14.81
13	24.28	29.32	25.68	17.95
15	20.94	19.06	19.29	17.7
16	22.12	18.18	17.2	16.16
41	16.66	17.04	15.45	14.47
55	21.64	21.73	19.07	20.51
56	20.66	21.39	19.59	18.75
57	21.4	21.79	19.86	19.1
58	20.19	20.15	19.93	18.2
59	21.18	22.58	21.52	20.35
73	26.83	24.81	23.35	22.34







**Direct Radiation Monitoring  
ISFSI & Selected REMP TLDs - Quarterly Gamma Exposure (mR/ std quarter)**



**Figure 7A**