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BVY 10-031

May 10, 2010

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

SUBJECT: 2009 Annual Radiological Environmental Operating Report
Vermont Yankee Nuclear Power Station
Docket No. 50-271
License No. DPR-28

Dear Sir or Madam,

In accordance with Vermont Yankee Technical Specification 6.6.E, attached is a copy of the 2009 Annual Radiological Environmental Operating Report. This report contains a summary and analysis of the radiological environmental data collected for the calendar year 2009.

There are no new regulatory commitments being made in this submittal.

Should you have any questions concerning this submittal, please contact Mr. James M. DeVincentis at (802) 451-3150.

Sincerely,

[MJC/JMD]

Attachment 1: 2009 Annual Radiological Environmental Operating Report

cc listing (next page)

IE25
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Docket No. 50-271
BVY 10-031

Attachment 1

Vermont Yankee Nuclear Power Station

2009 Annual Radiological Environmental Operating Report

ENTERGY - VERMONT YANKEE
Vermont Yankee Nuclear Power Station

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

Year 2009

Prepared by: _____ / 5-1-2010
Stephen P. Skibniowsky, Sr. Enviromental Specialist (REMP) Date

Reviewed by: _____ / 5/3/10
Stephen C. McAvoy, Chemistry Supervisor Date

Approved for Distribution: _____ / 5-5-10
Jeffery A. Hardy, Chemistry Superintendent Date

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1. INTRODUCTION

This report summarizes the findings of the Radiological Environmental Monitoring Program (REMP) conducted by Entergy-Vermont Yankee in the vicinity of the Vermont Yankee Nuclear Power Station (VYNPS) in Vernon, Vermont during the calendar year 2009. The analyses of samples collected indicated that no plant-generated radioactive material was found in any location off site. In all cases, the possible radiological impact was negligible with respect to exposure from natural background radiation. In no case did the detected levels exceed the most restrictive federal regulatory or plant license limits for radionuclides in the environment. Measured values were several orders of magnitude below reportable levels listed in Table 4.5 of this report. Except for sample deviations listed in Section 6.1, all other samples were collected and analyzed as required by the program.

This report is submitted annually in compliance with plant Technical Specification 6.6.E. The remainder of this report is organized as follows:

Section 2: Provides an introductory explanation of background radioactivity and radiation detected in the plant environs.

Section 3: Provides a brief description of the Vermont Yankee Nuclear Power Station site and its environs.

Section 4: Provides a description of the overall REMP program design. Included is a summary of the Vermont Yankee Nuclear Power Station (VYNPS) Off-Site Dose Calculation Manual (ODCM) requirements for REMP sampling, tables listing all locations sampled or monitored in 2009 with compass sectors and distances from the plant, and maps showing each REMP location. Tables listing Lower Limit of Detection requirements and Reporting Levels are also included.

Section 5: Consists of the summarized data as required by the VYNPS ODCM. The tables are in a format similar to that specified by the NRC Radiological Assessment Branch Technical Position on Environmental Monitoring (Reference 1). Also included is a summary of the 2009 environmental TLD measurements.

Section 6: Provides the results of the 2009 monitoring program. The performance of the program in meeting regulatory requirements as given in the ODCM is discussed, and the data acquired during the year are analyzed.

Section 7: Provides an overview of the Quality Assurance programs used at AREVA Framatome ANP Environmental Laboratory, Teledyne Brown Engineering and Entergy James A. Fitzpatrick's Environmental Laboratory.

Section 8: Summarizes the requirements and the results of the 2009 Land Use Census.

Section 9: Gives a summary of the 2009 Radiological Environmental Monitoring Program.

2. BACKGROUND RADIOACTIVITY

Radiation or radioactivity potentially detected in the Vermont Yankee environment can be grouped into three categories. The first is "naturally-occurring" radiation and radioactivity. The second is "man-made" radioactivity from sources other than the Vermont Yankee plant. The third potential source of radioactivity is due to emissions from the Vermont Yankee plant. For the purposes of the Vermont Yankee REMP, the first two categories are classified as "background" radiation, and are the subject of discussion in this section of the report. The third category is the one that the REMP is designed to detect and evaluate.

2.1 Naturally Occurring Background Radioactivity

Natural radiation and radioactivity in the environment, which provide the major source of human radiation exposure, may be subdivided into three separate categories: "primordial radioactivity," "cosmogenic radioactivity" and "cosmic radiation." "Primordial radioactivity" is made up of those radionuclides that were created with the universe and that have a sufficiently long half-life to be still present on the earth. Included in this category are the newly-formed "daughter" radionuclides descending from these original elements. A few of the more important radionuclides in this category are Uranium-238 (U-238), Thorium-232 (Th-232), Rubidium-87 (Rb-87), Potassium-40 (K-40), Radium-226 (Ra-226), and Radon-222 (Rn-222). Uranium-238 and Thorium-232 are readily detected in soil and rock, whether through direct field measurements or through laboratory analysis of samples. Radium-226 in the earth can find its way from the soil into ground water, and is often detectable there. Radon-222 is one of the components of natural background in air, and its daughter products are detectable on air sampling filters. Potassium-40 comprises about 0.01 percent of all natural potassium in the earth, and is consequently detectable in most biological substances, including the human body. There are many more primordial radionuclides found in the environment in addition to the major ones discussed above (Reference 2).

The second sub-category of naturally-occurring radiation and radioactivity is "cosmogenic radioactivity." This is produced through the nuclear interaction of high energy cosmic radiation with elements in the earth's atmosphere, and to a much lesser degree, in the earth's crust. These radioactive elements are then incorporated into the entire geosphere and atmosphere, including the earth's soil, surface rock, biosphere, sediments, ocean floors, polar ice and atmosphere. The major radionuclides in this category are Carbon-14 (C-14), Hydrogen-3 (H-3 or Tritium), Sodium-22 (Na-22), and Beryllium-7 (Be-7). Beryllium-7 is the one most readily detected, and is found on air sampling filters and occasionally in biological media (Reference 2).

The third sub-category of naturally-occurring radiation and radioactivity is "cosmic radiation." This consists of high energy atomic and sub-atomic particles of extra-terrestrial origin and the secondary particles and radiation that are produced through their interaction in the earth's atmosphere. The majority of this radiation comes from outside of our solar system, and to a lesser degree from the sun. We are protected from most of this radiation by the earth's atmosphere, which absorbs the radiation. Consequently, one can see that with increasing elevation one would be exposed to more cosmic radiation as a direct result of a thinner layer of air for protection. This "direct radiation" is detected in the field with gamma spectroscopy equipment, high pressure ion chambers and thermoluminescent dosimeters (TLDs).

2.2 Man-Made Background Radioactivity

The second source of "background" radioactivity in the Vermont Yankee environment is from "man-made" sources not related to the power plant. The most recent contributor to this category was the fallout from the Chernobyl accident in April of 1986, which was detected in the Vermont Yankee environment and other parts of the world. A much greater contributor to this category, however, has been fallout from atmospheric nuclear weapons tests. Tests were conducted from 1945 through 1980 by the United States, the Soviet Union, the United Kingdom, China and France, with the large majority of testing occurring during the periods 1954-1958 and 1961-1962. (A test ban treaty was signed in 1963 by the United States, Soviet Union and United Kingdom, but not by France and China.) Atmospheric testing was conducted by the People's Republic of China as recently as October 1980. Much of the fallout detected today is due to this explosion and the last large scale one, done in November of 1976 (Reference 3).

The radioactivity produced by these detonations was deposited worldwide. The amount of fallout deposited in any given area is dependent on many factors, such as the explosive yield of the device, the latitude and altitude of the detonation, the season in which it occurred, and the timing of subsequent rainfall which washes fallout from the troposphere (Reference 4). Most of this fallout has decayed into stable elements, but the residual radioactivity is still readily detectable in environmental samples worldwide. The two predominant radionuclides are Cesium-137 (Cs-137) and Strontium-90 (Sr-90). They are found in soil and in vegetation, and since cows and goats graze large areas of vegetation, these radionuclides are also often detected in milk.

Other potential "man-made" sources of environmental "background" radioactivity include other nuclear power plants, coal-fired power plants, national defense installations, hospitals, research laboratories and industry. These collectively are insignificant on a global scale when compared to the sources discussed above (natural and fallout).

3. GENERAL PLANT AND SITE INFORMATION

The Vermont Yankee Nuclear Power Station is located in the town of Vernon, Vermont in Windham County. The 130-acre site is on the west shore of the Connecticut River, immediately upstream of the Vernon Hydroelectric Station. The plant site is bounded on the north, south and west by privately-owned land, and on the east by the Connecticut River. The surrounding area is generally rural and lightly populated, and the topography is flat or gently rolling on the valley floor.

Construction of the single unit 540 megawatt BWR (Boiling Water Reactor) plant began in 1967. The pre-operational Radiological Environmental Monitoring Program, designed to measure environmental radiation and radioactivity levels in the area prior to station operation, began in 1970. Commercial operation began on November 30, 1972. An Extended Power Uprate, conducted in 2006, resulted in the present generation capacity of 650 megawatts electric.

4. PROGRAM DESIGN

The Radiological Environmental Monitoring Program (REMP) for the Vermont Yankee Nuclear Power Station (VYNPS) was designed with specific objectives in mind. These are:

- To provide an early indication of the appearance or accumulation of any radioactive material in the environment caused by the operation of the station.
- To provide assurance to regulatory agencies and the public that the station's environmental impact is known and within anticipated limits.
- To verify the adequacy and proper functioning of station effluent controls and monitoring systems.
- To provide standby monitoring capability for rapid assessment of risk to the general public in the event of unanticipated or accidental releases of radioactive material.

The program was initiated in 1970, approximately two years before the plant began commercial operation. It has been in operation continuously since that time, with improvements made periodically over those years.

The current program is designed to meet the intent of NRC Regulatory Guide 4.1, *Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants;* NRC Regulatory Guide 4.8, *Environmental Technical Specifications for Nuclear Power Plants;* the NRC Radiological Assessment Branch Technical Position of November 1979, *An Acceptable Radiological Environmental Monitoring Program;* and NRC NUREG-0473, *Radiological Effluent Technical Specifications for BWRs.* The environmental TLD program has been designed and tested around NRC Regulatory Guide 4.13, *Performance, Testing and Procedural Specifications for Thermoluminescence Dosimetry: Environmental Applications.* The quality assurance program is designed around the guidance given in NRC Regulatory Guide *4.15, Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment.*

The sampling requirements of the REMP are given in the Off-Site Dose Calculation Manual Table 3.5.1 and are summarized in Table 4.1 of this report. The identification of the required sampling locations is given in the Off-Site Dose Calculation Manual (ODCM), Chapter 7. These sampling and monitoring locations are shown graphically on the maps in Figures 4.1 through 4.6 of this report.

The Vermont Yankee Chemistry Department conducts the radiological environmental monitoring program and collects all airborne, terrestrial and ground water samples. VYNPS maintains a contract with Normandeau Associates to collect all fish, river water and river sediment samples. In 2009, analytical measurements of environmental samples were performed at the Entergy Nuclear Northeast J. A. Fitzpatrick N.P.P Environmental laboratory in Oswego, New York. TLD badges are posted and retrieved by the Vermont Yankee Chemistry Department, and are analyzed by the AREVA NP INC. Environmental Laboratory in Westborough, Massachusetts.

4.1 Monitoring Zones

The REMP is designed to allow comparison of levels of radioactivity in samples from the area possibly influenced by the plant to levels found in areas not influenced by the plant. Monitoring locations within the first zone are called "indicators." Those within the second zone are called "controls." The distinction between the two zones, depending on the type of sample or sample pathway, is based on one or more of several factors, such as site meteorological history, meteorological dispersion calculations, relative direction from the plant, river flow, and distance. Analysis of survey data from the two zones aids in determining if there is a significant difference between the two areas. It can also help in differentiating between radioactivity and radiation due to plant releases and that due to other fluctuations in the environment, such as atmospheric nuclear weapons test fallout or seasonal variations in the natural background.

4.2 Pathways Monitored

Four pathway categories are monitored by the REMP. They are the airborne, waterborne, ingestion and direct radiation pathways. Each of these four categories is monitored by the collection of one or more sample media, which are listed below, and are described in more detail in this section:

Airborne Pathway
- Air Particulate Sampling
- Charcoal Cartridge (Radioiodine) Sampling

Waterborne Pathways
- River Water Sampling
- Ground Water Sampling
- Sediment Sampling

Ingestion Pathways
- Milk Sampling
- Silage Sampling
- Mixed Grass Sampling
- Fish Sampling

Direct Radiation Pathway
- TLD Monitoring

4.3 Descriptions of Monitoring Programs

4.3.1 Air Sampling

Continuous air samplers are installed at seven locations. (Five are required by the VYNPS ODCM.) The sampling pumps at these locations operate continuously at a flow rate of approximately one cubic foot per minute. Airborne particulates are collected by passing air through a 50 mm glass-fiber filter. A dry gas meter is incorporated into the sampling stream to measure the total volume of air sampled in a given interval. The entire system is housed in a weatherproof structure. The filters were collected on a weekly frequency and, to allow for the decay of radon daughter products, the analysis for gross beta radioactivity is delayed for more than 24 hours. The weekly filters were composited by location at the environmental laboratory for a quarterly gamma spectroscopy analysis.

If the gross-beta activity on an air particulate sample is greater than ten times the yearly mean of the control samples, ODCM Table 3.5.1, Note c, requires a gamma isotopic analysis on the sample. Whenever the main plant stack effluent release rate of I-131 is equal to or greater than 0.1 μCi/sec, weekly air particulate collection from the plant stack is required by ODCM Table 3.5.1, Note h.

4.3.2 Charcoal Cartridge (Radioiodine) Sampling

Continuous air samplers are installed at seven locations. (Five are required by the ODCM Table 3.5.1.) The sampling pumps at these locations operate continuously at a flow rate of approximately one cubic foot per minute. A 60 cc TEDA-impregnated charcoal cartridge is located downstream of the air particulate filter described in Section 4.3.1 above. A dry gas meter is incorporated into the sampling stream to measure the total volume of air sampled in a given interval. The entire system is housed in a weatherproof structure. These cartridges are collected and analyzed weekly for I-131.

Whenever the main plant stack effluent release rate of 1-131 is equal to or greater than 0.1 μCi/sec, weekly charcoal cartridge collection is required, pursuant to ODCM Table 3.5.1, Note h.

4.3.3 River Water Sampling

An automatic compositing sampler is maintained at the downstream sampling location by the Vermont Yankee Chemistry Department staff. Normandeau Associates personnel maintain the pump that delivers river water to the sampler. The sampler is controlled by a timer that collects a frequent aliquot of river water. An additional grab sample is collected monthly at the upstream control location. Each sample is analyzed for gamma-emitting radionuclides. Although not required by the VYNPS ODCM, a gross-beta analysis is also performed on each sample. The monthly composite and grab samples are composited by location by the contracted environmental laboratory for a quarterly tritium (H-3) analysis.

4.3.4 Ground Water (Deep Well Potable Water) Sampling

Grab samples are collected quarterly from four indicator locations and one control location. Only one indicator and one control are required by the VYNPS ODCM. Each sample is analyzed for gamma-emitting radionuclides and H-3. Although not required by the VYNPS ODCM, a gross-beta analysis is also performed on each sample.

4.3.5 Sediment Sampling

River sediment grab samples are collected semiannually from the downriver location and at the North Storm Drain Outfall by Normandeau Associates. Each sample is analyzed at an offsite environmental laboratory for gamma-emitting radionuclides.

4.3.6 Milk Sampling

When milk animals are identified as being on pasture feed (May through October), milk samples are collected twice per month from that location. Throughout the rest of the year, and for the full year where animals are not on pasture, milk samples are collected on a monthly schedule. Three locations are chosen as a result of the annual Land Use Census, based on meteorological dispersion calculations. The fourth location is a control, which is located sufficiently far away from the plant to be outside any potential plant influence. Other samples may be collected from locations of interest.

Immediately after collection, each milk sample is refrigerated and then shipped to the contracted environmental laboratory. Each sample is analyzed for gamma-emitting radionuclides. A separate low-level I-131 analysis is performed to meet the Lower Limit of Detection requirements in the ODCM. Although not required by the ODCM, Sr-89 and Sr-90 analyses are also performed on quarterly composited samples.

4.3.7 Silage (Chopped Corn or Grass) Sampling

Silage samples are collected at the milk sampling location at the time of harvest, if available. The silage from each location is shipped to the contracted environmental laboratory where it is analyzed for gamma-emitting radionuclides. Although not required by the ODCM, the silage samples are analyzed for low-level I-131.

4.3.8 Mixed Grass Sampling

At each air sampling station, a mixed grass sample is collected quarterly, when available. Enough grass is clipped to provide the minimal sample weight needed to achieve the required Lower Limit of Detection (LLD). The mixed grass samples are analyzed for gamma-emitting radionuclides. Although not required by the ODCM, the grass samples are analyzed for low-level I-131.

4.3.9 Fish Sampling

Fish samples are collected semiannually at two Connecticut River locations (upstream of the plant and in the Vernon Pond) by Normandeau Associates. The samples are frozen and delivered to the environmental laboratory where the edible portions are analyzed for gamma-emitting radionuclides.

4.3.10 TLD Monitoring

Direct gamma radiation exposure is continuously monitored with the use of thermoluminescent dosimeters (TLDs). Specifically, Panasonic UD-801AS1 and UD-814AS1 calcium sulfate dosimeters are used, with a total of five elements in place at each monitoring location. Each pair of dosimeters is sealed in a plastic bag, which is in turn housed in a plastic screen cylinder. This cylinder is attached to an object such as a fence or utility pole.

A total of 40 stations are required by the ODCM. Of these, 24 must be read out quarterly, while those from the remaining 16 incident response (outer ring) stations need only be de-dosed (annealed) quarterly, unless an ODCM gaseous release limit was exceeded during the period. Although not required by the ODCM, the TLDs from the 16 outer ring stations are read out quarterly along with the other stations' TLDs. In addition to the TLDs required by the ODCM, more than thirteen are typically posted at or near the site boundary. The plant staff posts and retrieves all TLDs, while the contracted environmental laboratory (AREVA NP Inc.) provides processing.

TABLE 4.1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

(as required by ODCM Table 3.5.1)*

Exposure Pathway and/or Sample Media	Collection			Analysis	
	Number of Sample Locations	Routine Sampling Mode	Collection Frequency	Analysis Type	Analysis Frequency
1. Direct Radiation (TLDs)	40	Continuous	Quarterly	Gamma dose; Outer Ring - dc-dose only, unless gaseous release Control was exceeded	Each TLD
2. Airborne (Particulates and Radioiodine)	5	Continuous	Weekly	Particulate Sample: Gross Beta	Each Sample
				Gamma Isotopic	Quarterly Composite (by location)
				Radioiodine Canister: I-131	Each Sample
3. Waterborne					
a. Surface water	2	Downstream. Automatic composite	Monthly	Gamma Isotopic Tritium (H-3)	Each Sample Quarterly Composite
b. Ground water	2	Upstream: grab Grab	Quarterly	Gamma Isotopic Tritium (H-3)	Each Sample Each Sample
c. Shoreline Sediment	2	Downstream: grab N. Storm Drain Outfall: grab	Semiannually	Gamma Isotopic	Each Sample

- See ODCM Table 3.5.1 for complete footnotes.

TABLE 4.1, cont.

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM
(as required by ODCM Table 3.5.1)*

Exposure Pathway and/or Sample Media	Collection			Analysis	
	Nominal Number of Sample Locations	Routine Sampling Mode	Nominal Collection Frequency	Analysis Type	Analysis Frequency
4. Ingestion					
a. Milk	4	Grab	Monthly (Semimonthly when on pasture)	Gamma Isotopic 1-131	Each sample Each sample
b. Fish	2	Grab	Semiannually	Gamma Isotopic on edible portions	Each sample
c. Vegetation					
Grass sample	1 at each air sampling station	Grab	Quarterly when available	Gamma Isotopic	Each sample
Silage sample	1 at each milk sampling station	Grab	At harvest	Gamma Isotopic	Each sample

* See ODCM Table 3.5.1 for complete footnotes.

TABLE 4.2

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (NON-TLD) IN 2009
VERMONT YANKEE NUCLEAR POWER STATION

Exposure Pathway	Station Code	Station Description	Zone[a]	Distance From Plant Stack (km)	Direction From Plant
I. Airborne					
	AP/CF-11	River Sta. No. 3.3	I	1.9	SSE
	AP/CF-12	N. Hinsdale, NH	I	3.6	NNW
	AP/CF-13	Hinsdale Substation	I	3.1	E
	AP/CF-14	Northfield, MA	I	11.6	SSE
	AP/CF-15	Tyler Hill Road	I	3.1	WNW
	AP/CF-21	Spofford Lake	C	16.4	NNE
	AP/CF-40	Gov. Hunt House	I	--	On-site
2. Waterborne					
a. Surface	WR-11	River Sta. No. 3.3	I	1.9	SSE
	WR-21	Rt.9 Bridge	C	11.8	NNW
b. Ground	WG-11	Plant Well	I	0.2	On-site
	WG-12	Vernon Nursing Well	I	2.1	SSE
	WG-13	COB Well	I	0.3	On-site
	WG-14	Plant Support Bldg (PSB) Well	I	0.3	On-site
	WT-14	Test Well 201	I	--	On-site
	WT-16	Test Well 202	I	--	On-site
	WT-17	Test Well 203	I	--	On-site
	WT-18	Test Well 204	I	--	On-site
	WG-22	Copeland Well	C	13.7	N
c. Sediment	SE-11	Shoreline Downriver	I	0.6	SSE
	SE-12	North Storm Drain Outfall	I	0.1	E

TABLE 4.2, cont.

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (NON-TLD) IN 2009
VERMONT YANKEE NUCLEAR POWER STATION

Direction Exposure Pathway Stack	Station Code	Station Description	Zone[a]	Distance From Plant Stack(km)	From Plant
3. Ingestion					
a. Milk	TM-11	Miller Farm	I	0.8	W
	TM-14	Brown Farm	I	2.2	S
	TM-18	Blodgett Farm	I	3.6	SE
	TM-22	Franklin Farm	I	9.7	WSW
	TM-24	County Farm	C	21.6	N
b. Fish	FH-11	Vernon Pond	I	0.6[b]	SSE
	FH-21	Rt.9 Bridge	C	11.8	NNW
c. Mixed Grass	TG-11	River Sta. No. 3.3	I	1.9	SSE
	TG-12	N. Hinsdale, NH	I	3.6	NNW
	TG-13	Hinsdale Substation	I	3.1	E
	TG-14	Northfield, MA	I	11.6	SSE
	TG-15	Tyler Hill Rd.	I	3.1	WNW
	TG-21	Spofford Lake	C	16.4	NNE
	TG-40	Gov. Hunt House	I	--	On-site
d. Silage	TC-11	Miller Farm	I	0.8	W
	TC-14	Brown Farm	I	2.2	S
	TC-18	Blodgett Farm	I	3.6	SE
	TC-22	Franklin Farm	I	9.7	WSW
	TC-24	County Farm	C	21.6	N

(a) I = Indicator Stations; C = Control Stations
(b) Fish samples are collected anywhere in Vernon Pond, which is adjacent to the plant (see Figure 4.1).

TABLE 4.3

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (TLD) IN 2009
VERMONT YANKEE NUCLEAR POWER STATION

Station Code	Station Description	Zone[a]	Distance From Plant (km) [d]	Direction From Plant[d]
DR-1	River Sta. No. 3.3	I	1.6	SSE
DR-2	N. Hinsdale, NH	I	3.9	NNW
DR-3	Hinsdale Substation	I	3.0	E
DR-4	Northfield, MA	C	11.3	SSE
DR-5	Spofford Lake	C	16.5	NNE
DR-6	Vernon School	I	0.52	WSW
DR-7	Site Boundary[c]	SB	0.28	W
DR-8	Site Boundary	SB	0.25	SSW
DR-9	Inner Ring	I	1.7	N
DR-10	Outer Ring	O	4.5	N
DR-11	Inner Ring	I	1.6	NNE
DR-12	Outer Ring	O	3.6	NNE
DR-13	InnerRing	I	1.2	NE
DR-14	Outer Ring	O	3.9	NE
DR-15	Inner Ring	I	1.5	ENE
DR-16	Outer Ring	O	2.8	ENE
DR-17	Inner Ring	I	1.2	E
DR-18	Outer Ring	O	3.0	E
DR-19	Inner Ring	I	3.7	ESE
DR-20	Outer Ring	O	5.3	ESE
DR-21	Inner Ring	I	1.8	SE
DR-22	Outer Ring	O	3.3	SE
DR-23	Inner Ring	I	2.0	SSE
DR-24	Outer Ring	O	3.9	SSE
DR-25	Inner Ring	I	1.9	S
DR-26	Outer Ring	O	3.8	S
DR-27	Inner Ring	I	1.1	SSW
DR-28	Outer Ring	O	2.2	SSW
DR-29	Inner Ring	I	0.9	SW
DR-30	Outer Ring	O	2.4	SW

TABLE 4.3, cont.

RADIOLOGICAL ENVIRONMENTAL MONITORING LOCATIONS (TLD) IN 2009
VERMONT YANKEE NUCLEAR POWER STATION

Station Code	Station Description	Zone[a]	Distance From Plant (km)[d]	Direction From Plant[d]
DR-31	Inner Ring	I	0.71	WSW
DR-32	Outer Ring	O	5.1	WSW
DR-33	Inner Ring	I	0.66	WNW
DR-34	Outer Ring	O	4.6	W
DR-35	Inner Ring	I	1.3	WNW
DR-36	Outer Ring	O	4.4	WNW
DR-37	Inner Ring	I	2.8	NW
DR-38	Outer Ring	O	7.3	NW
DR-39	Inner Ring	I	3.1	NNW
DR-40	Outer Ring	O	5.0	NNW
DR-41[b]	Site Boundary	SB	0.38	SSW
DR-42[b]	Site Boundary	SB	0.59	S
DR-43[b]	Site Boundary	SB	0.44	SSE
DR-44[b]	Site Boundary	SB	0.19	SE
DR-45[b]	Site Boundary	SB	0.12	NE
DR-46[b]	Site Boundary	SB	0.28	NNW
DR-47[b]	Site Boundary	SB	0.50	NNW
DR-48[b]	Site Boundary	SB	0.82	NW
DR-49[b]	Site Boundary	SB	0.55	WNW
DR-50[b]	Gov. Hunt House	I	0.35	SSW
DR-51[b]	Site Boundary	SB	0.26	W
DR-52[b]	Site Boundary	SB	0.24	SW
DR-53[b]	Site Boundary	SB	0.21	WSW

(a) I = Inner Ring TLD; O = Outer Ring Incident Response TLD; C = Control TLD; SB = Site Boundary TLD.

(b) This location is not considered a requirement of ODCM Table 3.5.1.

(c) DR-7 satisfies ODCM Table 3.5.1 for an inner ring direct radiation monitoring location. However, it is averaged as a Site Boundary TLD due to its close proximity to the plant.

(d) Distance and direction is relative to the center of the Turbine Building for direct radiation monitors.

TABLE 4.4
ENVIRONMENTAL LOWER LIMIT OF DETECTION (LLD) SENSITIVITY REQUIREMENTS

Analysis	Water (pCi/l)	Airborne Particulates or Gases (pCi/m^3)	Fish (pCi/Kg)	Milk (pCi/l)	Vegetation (pCi/Kg)	Sediment (pCi/Kg - dry)
Gross-Beta	4	0.01				
H-3	2000					
Mn-54	15		130			
Fe-59	30		260			
Co-58,60	15		130			
Zn-65	30		260			
Zr-Nb-95	15					
I-131		0.07		1	60	
Cs-134	15	0.05	130	15	60	150
Cs-137	18	0.06	150	18	80	180
Ba-La-140	15			15		

See ODCM Table 4.5.1 for explanatory footnotes

TABLE 4.5

REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES

Analysis	Water (pCi/l)	Airborne Particulates or Gases (pCi/m^3)	Fish (pCi/Kg)	Milk (pCi/l)	Food Product (pCi/Kg)	Sediment (pCi/Kg-dry)
H-3	20,000[(a)]					
Mn-54	1000		30,000			
Fe-59	400		10,000			
Co-58	1000		30,000			
Co-60	300		10,000			3000[(b)]
Zn-65	300		20,000			
Zr-Nb-95	400					
I-131		0.9		3	100	
Cs-134	30	10	1000	60	1000	
Cs-137	50	20	2000	70	2000	
Ba-La-140	200			300		

(a) Reporting Level for drinking water pathways. For non-drinking water, a value of 30,000 pCi/liter may be used.
(b) Reporting Level for grab samples taken at the North Storm Drain Outfall only.

See ODCM Table 3.5.2 for additional explanatory footnotes.

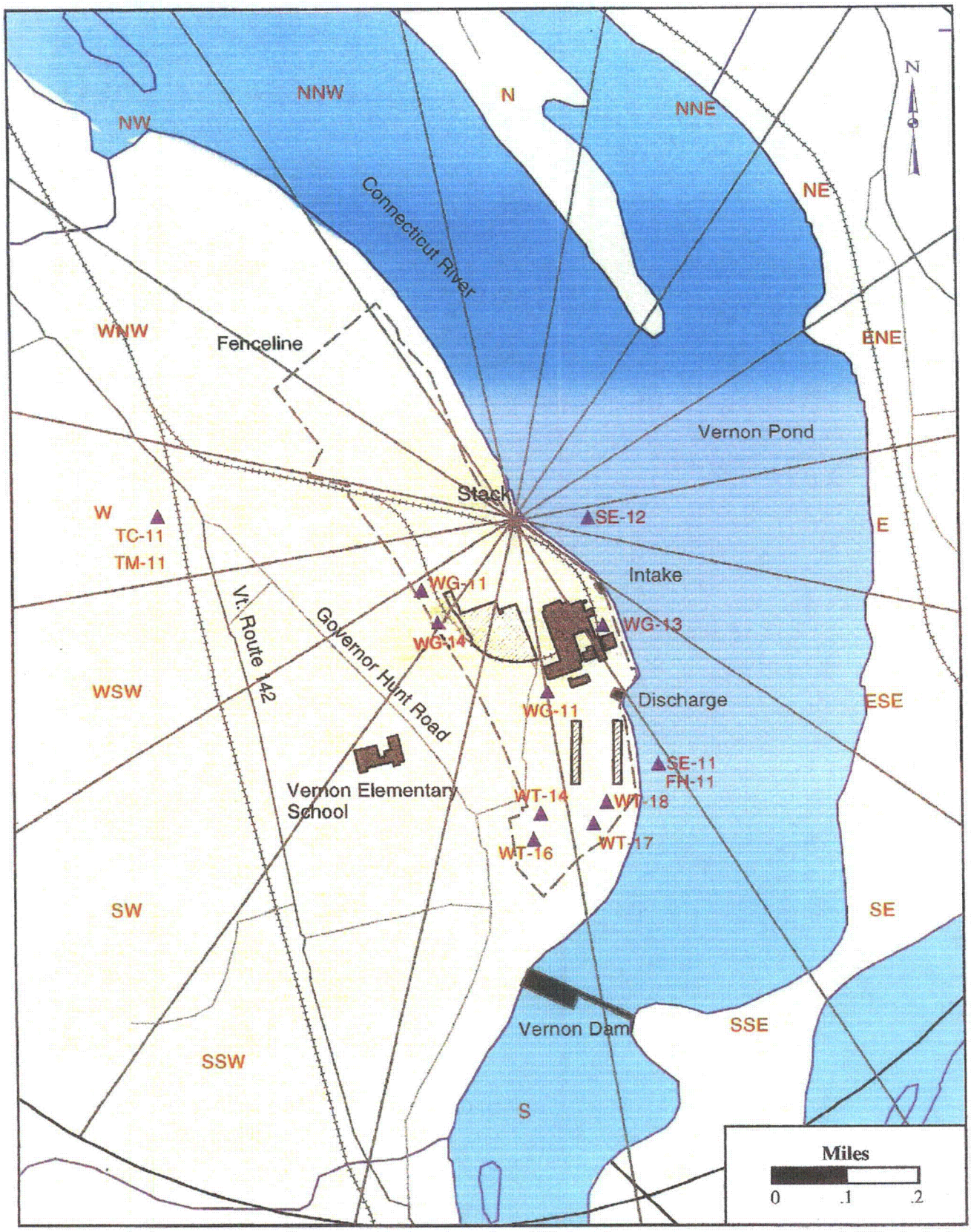

Figure 4.1 Environmental Sampling Locations In Close Proximity to Plant

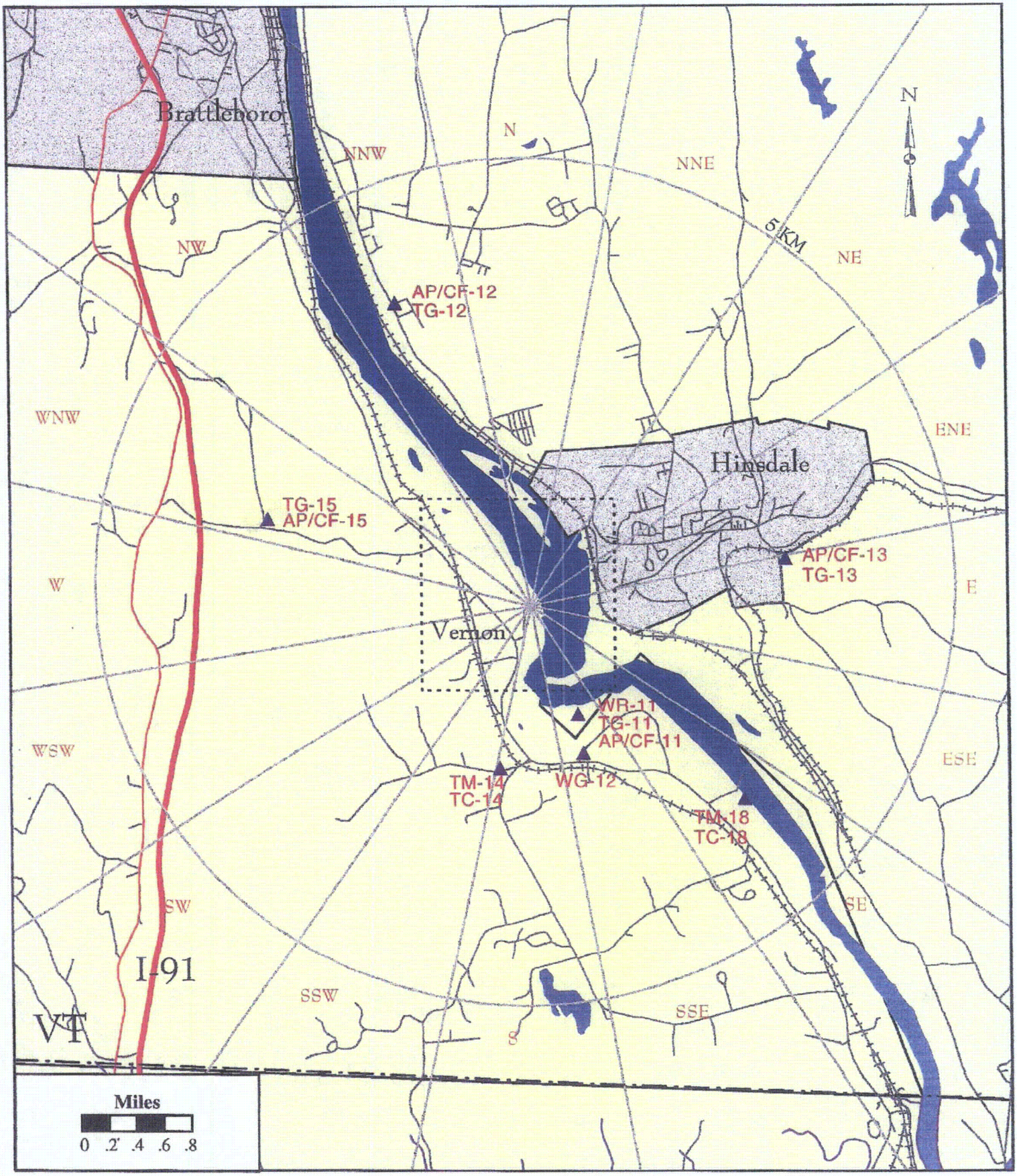

Figure 4.2 Environmental Sampling Locations Within 5 Km of Plant

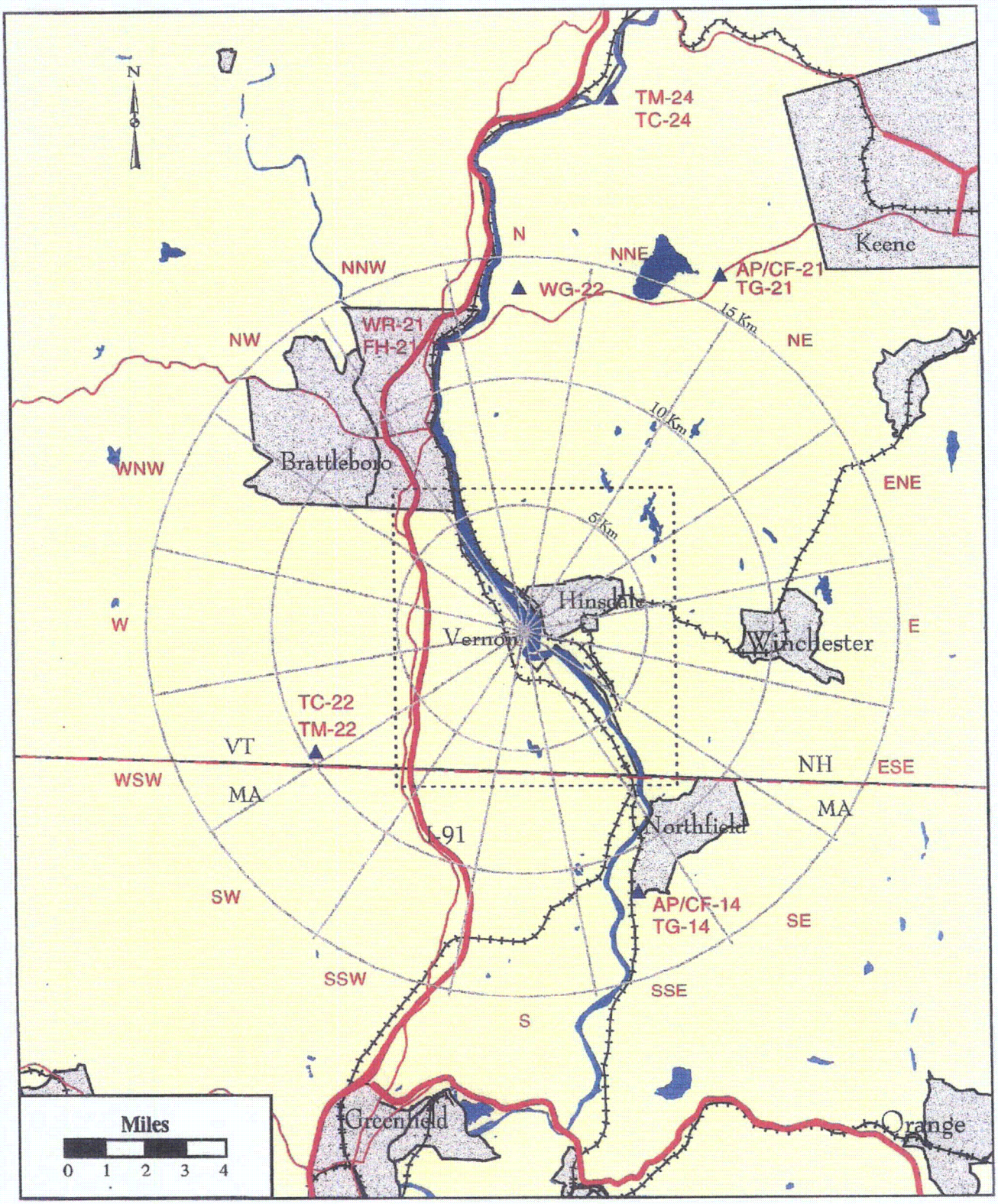

Figure 4.3 Environmental Sampling Locations Greater than 5 Km from Plant

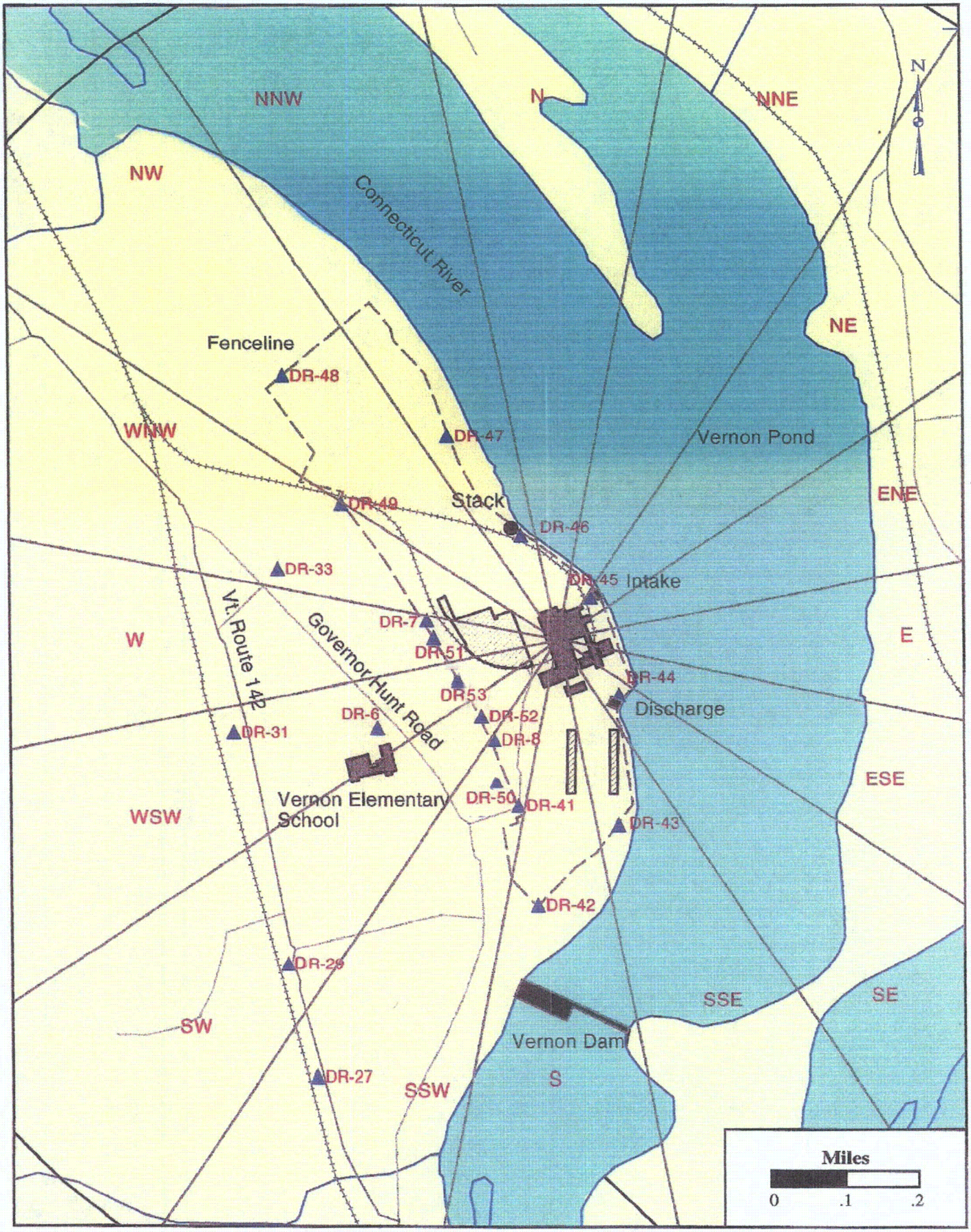

Figure 4.4 Thermoluminescent Dosimeter Locations
In Close Proximity to Plant

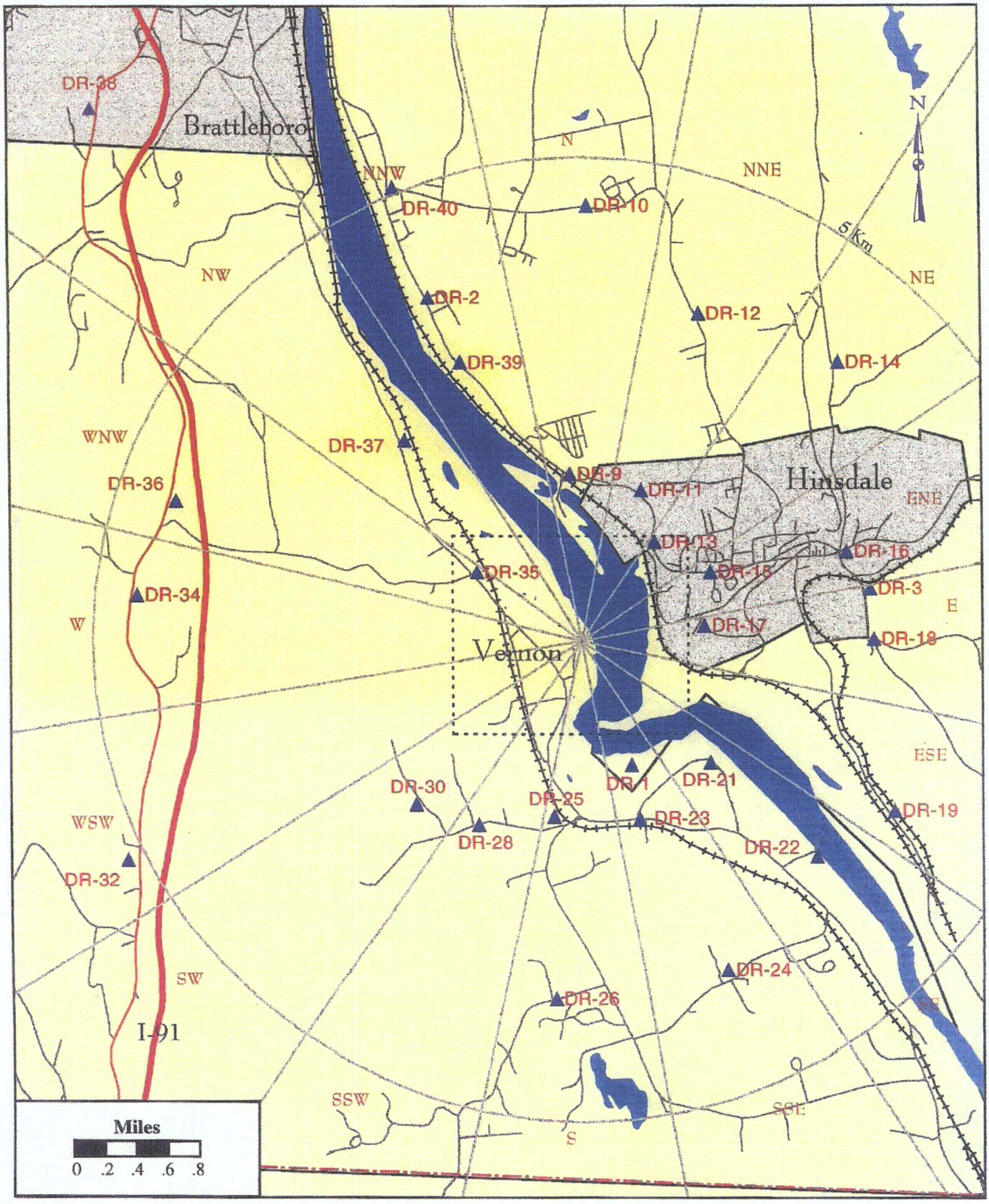

Figure 4.5 Thermoluminescent Dosimeter Locations Within 5 Km of Plant

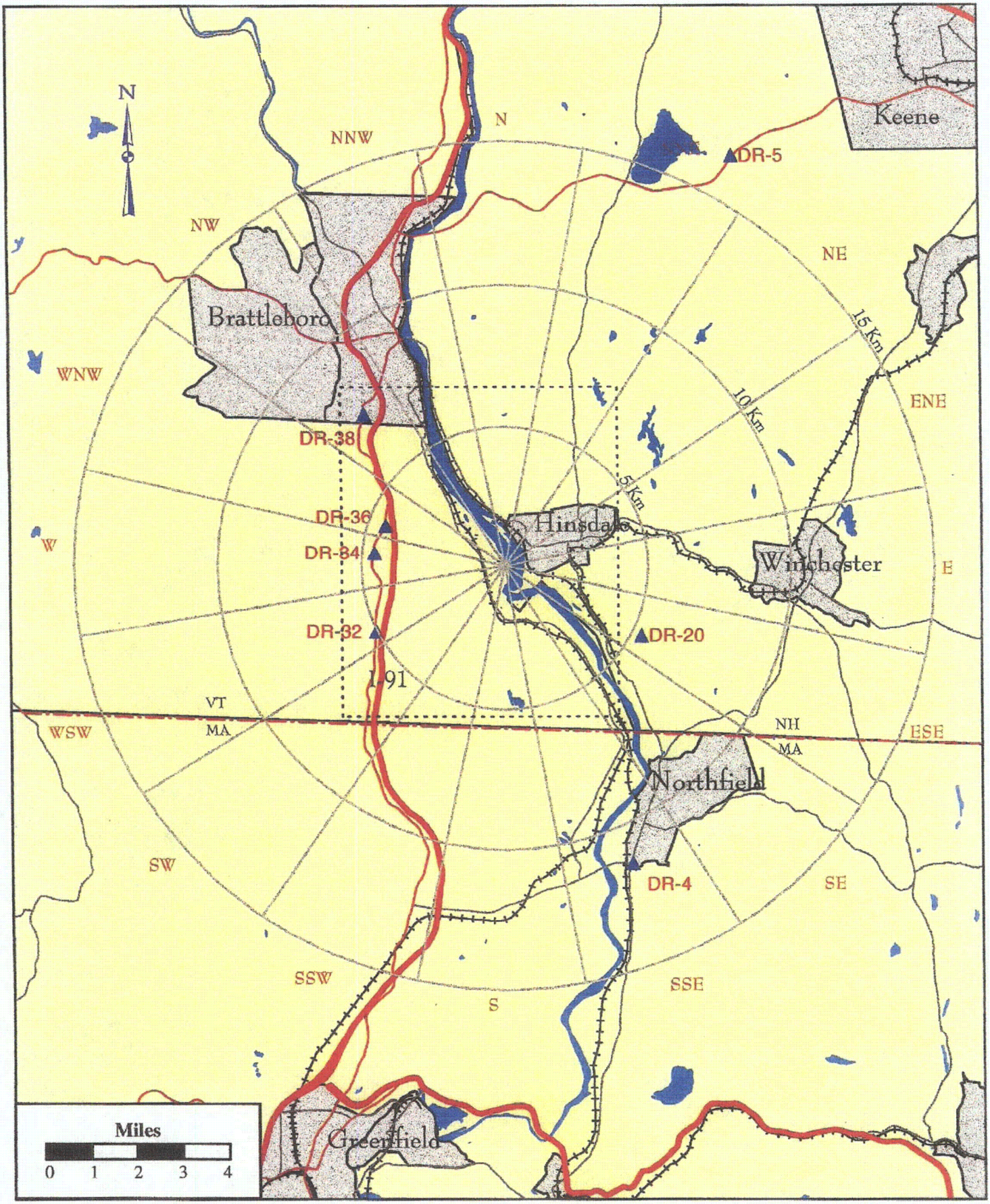

Figure 4.6 Thermoluminescent Dosimeter Locations
Greater than 5 Km from Plant

5. RADIOLOGICAL DATA SUMMARY TABLES

This section summarizes the analytical results of the environmental samples that were collected during 2009. These results, shown in Table 5.1, are presented in a format similar to that prescribed in the NRC's Radiological Assessment Branch Technical Position on Environmental Monitoring (Reference 1). The results are ordered by sample media type and then by radionuclide. The units for each media type are also given.

In 2009, Vermont Yankee contracted with one laboratory for primary analyses of the environmental samples. A second laboratory was used to cross-check the first laboratory for selected samples.

The left-most column of Table 5.1 contains the radionuclide of interest, the total number of analyses for that radionuclide in 2009 and the number of measurements which exceeded the Reporting Levels found in Table 3.5.2 of the VYNPS Off-site Dose Calculation Manual. The latter are classified as "Non-routine" measurements. The second column lists the required Lower Limit of Detection (LLD) for those radionuclides that have detection capability requirements as specified in the ODCM Table 4.5.1. The absence of a value in this column indicates that no LLD is specified in the ODCM for that radionuclide in that media. The target LLD for any analysis is typically 50 percent of the most restrictive required LLD. Occasionally the required LLD may not be met. This may be due to malfunctions in sampling equipment or lack of sufficient sample quantity which would then result in low sample volume. Delays in analysis at the laboratory could also be a factor. Such cases, if and when they should occur, would be addressed in Section 6.2.

For each radionuclide and media type, the remaining three columns summarize the data for the following categories of monitoring locations: (1) the Indicator stations, which are within the range of influence of the plant and which could be affected by its operation; (2) the Control stations, which are beyond the influence of the plant; and (3) the station which had the highest mean concentration during 2009 for that radionuclide. Direct radiation monitoring stations (using TLDs) are grouped into Inner Ring, Outer ring, Site Boundary and Control.

In each of these columns, for each radionuclide, the following statistical values are given:

- The mean value of all concentrations, including those results that are less than the *a posteriori* LLD for that analysis.
- The minimum and maximum concentration, including those results that are less than the *a posteriori* LLD. In previous years, data less than the *a posteriori* LLD were converted to zero for purposes of reporting the means and ranges.

- The "Number Detected" is the number of positive measurements. A measurement is considered positive when the concentration is greater than three times the standard deviation in the concentration and greater than or equal to the *a posteriori* LLD (Minimum Detectable Concentration or MDC).
- The "Total Analyzed" for each column is also given.

Each single radioactivity measurement datum in this report is based on a single measurement of a sample. Any concentration below the *a posteriori* LLD for its analysis is averaged with those values above the *a posteriori* LLD to determine the average of the results. Likewise, the values are reported in ranges even though they are below the *a posteriori* LLD. To be consistent with normal data review practices used by Vermont Yankee, a "positive measurement" is considered to be one whose concentration is greater than three times its associated standard deviation, is greater than or equal to the *a posteriori* LLD and satisfies the analytical laboratory's criteria for identification.

The radionuclides reported in this section represent those that: 1) had an LLD requirement in Table 4.5.1 of the ODCM, or a Reporting Level listed in Table 3.5.2 of the ODCM, or 2) had a positive measurement of radioactivity, whether it was naturally-occurring or man-made; or 3) were of special interest for any other reason. The radionuclides routinely analyzed and reported by the environmental laboratory (in a gamma spectroscopy analysis) were: Th-232, Ba/La-140, Be-7, Co-58, Co-60, Cs-134, Cs-137, Fe-59, K-40, Mn-54, Zn-65 and Zr-95.

Data from direct radiation measurements made by TLDs are provided in Table 5.2. The complete listing of quarterly TLD data is provided in Table 5.3.

Radiological Environmental Program Summary
2009 Radiological Environmental Operating Report
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Table 5.1:

Sample Medium:	Air Particulate (AP)
Sample Medium:	Charcoal Cartridge (CF)
Sample Medium:	River Water (WR)
Sample Medium:	Ground Water (WG)
Sample Medium:	Sediment (SE)
Sample Medium:	Test Well (WT)
Sample Medium:	Shoreline Well (WS)
Sample Medium:	Milk (TM)
Sample Medium:	Silage (TC)
Sample Medium:	Mixed Grass (TG)
Sample Medium:	Fish (FH)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT **DOCKET NUMBER:** 50-271
Location of Facility: VERNON, VT **REPORTING PERIOD:** 2009

MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
AIR PARTICULATE (PCI/CU.METER)	GROSS BETA	363	0.01	0.0115 (311/311) (0.0010/0.0230)	0.0112 (52/52) (0.0040/0.0220)	0.0122 (52/52) (0.0020/0.0230)	12 INDICATOR N. HINSDALE, NH 3.6 MILES NNW OF SITE	0
	GAMMA	28						
	BE-7		N/A	0.1132 (24/24) (0.0739/0.1548)	0.1126 (4/4) (0.0991/0.1340)	0.1219 (4/4) (0.0870/0.1548)	12 INDICATOR N. HINSDALE, NH 3.6 MILES NNW OF SITE	0
	K-40		N/A	0.0281 (1/24) (<0.0085/<0.0602)	0.0315 (0/4) (<0.0086/0.0480)	0.0405 (1/4) (<0.0282/0.0602)	14 INDICATOR NORTHFIELD, MA 11.6 MILES SSE OF SITE	0
	CS-134		0.05	0.0030 (0/24) (<0.0009/<0.0050)	0.0045 (0/4) (<0.0037/<0.0058)	0.0045 (0/4) (<0.0037/<0.0058)	21 CONTROL SPOFFORD LAKE 16.4 MILES NNE OF SITE	0
	CS-137		0.06	0.0026 (0/24) (<0.0007<0.0061)	0.0030 (0/4) (<0.0023/<0.0036)	0.0034 (0/4) (<0.0022/<0.0061)	14 INDICATOR NORTHFIELD, MA 11.6 MILES SSE OF SITE	0
	RA-226		N/A	0.0316 (0/24) (<0.0216/<0.0420)	0.0322 (0/4) (<0.0191/<0.0439)	0.0334 (0/4) (<0.0216/<0.0412)	14 INDICATOR NORTHFIELD, MA 11.6 MILES SSE OF SITE	0
	AC/TH-228		N/A	0.0083 (0/24) (<0.0022/<0.0187)	0.0096 (0/4) (<0.0079/<0.0124)	0.0104 (0/4) (<0.0034/<0.0187)	14 INDICATOR NORTHFIELD, MA 11.6 MILES SSE OF SITE	0
AIR IODINE (PCI/CU.METER)	I-131	363	0.07	0.0303 (0/311) (<0.0057/<0.0501)	0.0374 (0/52) (<0.0176/<0.0497)	0.0374 (0/52) (<0.0176/<0.0497)	21 CONTROL SPOFFORD LAKE 16.4 MILES NNE OF SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT **DOCKET NUMBER:** 50-271
Location of Facility: VERNON, VT **REPORTING PERIOD:** 2009

MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
RIVER WATER (PCI/LITER)	GROSS BETA	24	4	1.46 (12/12) (0.630/3.76)	0.978 (9/12) (0.000/1.40)	1.46 (12/12) (0.630/3.76)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0
	TRITIUM *	8	3000	410 (0/4) (<403/<416)	410 (0/4) (<403/<416)	410 (0/4) (<403/<416)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0
			* Stations 11 and 21 have the same average.					
	GAMMA	24						
	MN-54		15	2.50 (0/12) (<1.63/<3.72)	4.92 (0/12) (<3.62/<6.96)	4.92 (0/12) (<3.62/<6.96)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	CO-58		15	2.95 (0/12) (<1.91/<4.99)	4.92 (0/12) (<3.65/<6.64)	4.92 (0/12) (<3.65/<6.64)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	FE-59		30	8.33 (0/12) (<5.68/<13.9)	12.8 (0/12) (<8.68/<21.4)	12.8 (0/12) (<8.68/<21.4)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	CO-60		15	2.56 (0/12) (<1.63/<3.95)	5.13 (0/12) (<3.64/<7.60)	5.13 (0/12) (<3.64/<7.60)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	ZN-65		30	4.74 (0/12) (<2.26/<13.1)	11.8 (0/12) (<5.00/<21.1)	11.8 (0/12) (<5.00/<21.1)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	ZR-95		15	5.09 (0/12) (<3.44/<7.33)	8.25 (0/12) (<5.50/<12.8)	8.25 (0/12) (<5.50/<12.8)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

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Location of Facility: VERNON, VT **REPORTING PERIOD:** 2009

MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
RIVER WATER (PCI/LITER)	I-131		15	9.85 (0/12) (<6.58/<12.8)	6.76 (0/12) (<3.78/<9.12)	9.85 (0/12) (<6.58/<12.8)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0
	CS-134		15	1.97 (0/12) (<1.31/<2.98)	4.65 (0/12) (<2.81/<7.61)	4.65 (0/12) (<2.81/<7.61)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	CS-137		18	2.59 (0/12) (<1.82/<4.41)	4.99 (0/12) (<3.62/<7.01)	4.99 (0/12) (<3.62/<7.01)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
	BA-LA-140		15	7.06 (0/12) (<4.99/<9.94)	6.95 (0/12) (<2.88/<12.1)	7.06 (0/12) (<4.99/<9.94)	11 INDICATOR RIVER STATION NO. 3.3 1.9 MILES SSE OF SITE	0
	RA-226		N/A	86.5 (5/12) (65.4/127)	110 (8/12) (57.1/160)	110 (8/12) (57.1/160)	21 CONTROL RT. 9 BRIDGE 11.8 MILES NNW OF SITE	0
GROUND WATER (PCI/LITER)	GROSS BETA	20	4	3.58 (16/16) (1.84/6.37)	1.68 (3/4) (0.760/2.36)	5.01 (4/4) (2.21/6.37)	13 INDICATOR COB WELL 0.3 MILES ON-SITE	0
	TRITIUM *	20	2000	412 (0/16) (<411/<416)	411 (0/4) (<411/<411)	412 (0/16) (<411/<416)	11 INDICATOR PLANT WELL 0.2 MILES ON-SITE	0
				* Stations 11, 12, 13 and 14 have the same average.				
	I-131	20	1	0.385 (0/16) (<0.343/<0.445)	0.458 (0/4) (<0.440/<0.470)	0.458 (0/4) (<0.440/<0.470)	22 CONTROL COPELAND WELL 13.7 MILES N OF SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

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Location of Facility: VERNON, VT **REPORTING PERIOD:** 2009

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GROUND WATER (PCI/LITER)	GAMMA	20						
	MN-54		15	5.67 (0/16) (<3.73/<9.43)	7.67 (0/4) (<6.15/<8.23)	7.67 (0/4) (<6.15/<8.23)	22 CONTROL COPELAND WELL 13.7 MILES N OF SITE	0
	CO-58		15	4.89 (0/16) (<3.09/<6.23)	7.87 (0/4) (<6.68/<8.56)	7.87 (0/4) (<6.68/<8.56)	22 CONTROL COPELAND WELL 13.7 MILES N OF SITE	0
	FE-59		30	15.8 (0/16) (<9.72/<22.5)	19.3 (0/4) (<17.9/<21.3)	19.3 (0/4) (<17.9/<21.3)	22 CONTROL COPELAND WELL 13.7 MILES N OF SITE	0
	CO-60		15	7.23 (0/16) (<4.46/<9.96)	7.51 (0/4) (<7.33/<7.84)	8.13 (0/4) (<6.23/<9.96)	14 INDICATOR PLANT SUPPORT BLDG WELL 0.3 MILES ONSITE	0
	ZN-65		30	9.48 (0/16) (<6.00/<13.4)	11.5 (0/4) (<9.87/<12.8)	11.5 (0/4) (<9.87/<12.8)	22 CONTROL COPELAND WELL 13.7 MILES N OF SITE	0
	ZR-95		15	11.5 (0/16) (<7.10/<14.9)	11.9 (0/4) (<10.4/<14.8)	13.4 (0/4) (<10.8/<14.9)	14 INDICATOR PLANT SUPPORT BLDG WELL 0.3 MILES ONSITE	0
	CS-134		15	6.25 (0/16) (<3.77/<9.97)	5.51 (0/4) (<4.55/<6.42)	7.85 (0/4) (<6.33/<9.06)	12 INDICATOR VERNON NURSING WELL 2.1 MILES SSE OF SITE	0
	CS-137		18	5.32 (0/16) (<3.45/<8.27)	5.81 (0/4) (<4.44/<7.94)	6.03 (0/4) (<5.13/<7.09)	13 INDICATOR COB WELL 0.3 MILES ON-SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT **DOCKET NUMBER:** 50-271
Location of Facility: VERNON, VT **REPORTING PERIOD:** 2009

MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
GROUND WATER (PCI/LITER)	BA-LA-140		15	8.71 (0/16) (<5.30/<12.7)	10.1 (0/4) (<8.94/<10.7)	10.1 (0/4) (<8.94/<10.7)	22 CONTROL SKIBNIOWSKY WELL 13.7 MILES N OF SITE	0
	RA-226		N/A	200 (2/16) (67.2/<292)	150 (2/4) (93.1/<198)	237 (1/4) (<200/<280)	14 INDICATOR PLANT SUPPORT BLDG WELL 0.3 MILES ONSITE	0
SEDIMENT (PCI/KG DRY)	GAMMA	36						
	BE-7		N/A	630 (2/34) (<317/1300)	379 (0/2) (<244/<513)	947 (1/2) (<593/1300)	22 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	K-40		N/A	16259 (34/34) (7940/21700)	12400 (2/2) (11900/12900)	20700 (2/2) (20600/20800)	29 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	MN-54		N/A	55.6 (0/34) (<32.5/<86.5)	28.2 (0/2) (<24.0/<32.4)	77.2 (0/2) (<69.1/<85.3)	29 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	CO-60		N/A	56.5 (1/34) (<30.1/121)	22.6 (0/2) (<17.5/<27.7)	107 (1/2) (<92.0/121)	13 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	NB-95		N/A	72.6 (0/34) (<39.7/<135)	36.4 (0/2) (<26.7/<46.0)	106 (0/2) (<77.8/<135)	12 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	CS-134		150	46.7 (0/34) (<25.3/<73.0)	22.9 (0/2) (<18.5/<27.3)	67.9 (0/2) (<63.3/<72.4)	29 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT **DOCKET NUMBER:** 50-271
Location of Facility: VERNON, VT **REPORTING PERIOD:** 2009

MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
SEDIMENT (PCI/KG DRY)	CS-137		180	108 (24/34) (<40.3/197)	107 (2/2) (89.0/125)	150 (2/2) (144/155)	25 INDICATOR DOWNSTREAM RIVER STATION (3-3) 1.9 MILES SSE OF SITE	0
	BA-LA-140		N/A	263 (0/34) (<48.3/<509)	223 (0/2) (<99.2/<346)	361 (0/2) (<253/<469)	12 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	RA-226		N/A	2102 (27/34) (<645/3600)	532 (0/2) (<444/<619)	3265 (2/2) (3230/3300)	29 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	AC-228		N/A	1993 (30/34) (<115/5210)	871 (1/2) (<112/1630)	3270 (2/2) (1680/4860)	30 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	TH-228		N/A	1214 (34/34) (434/1660)	906 (2/2) (762/1050)	1480 (2/2) (1300/1660)	31 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	TH-232		N/A	1134 (34/34) (433/1560)	831 (2/2) (662/1000)	1410 (2/2) (1400/1420)	29 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
	U-238		N/A	5836 (0/34) (<3190/<9820)	3325 (0/2) (<3100/<3550)	7800 (0/2) (<7320/<8280)	29 INDICATOR NORTH STORM DRAIN OUTFALL 0.1 MILES E OF SITE	0
TEST WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	GROSS BETA	16	4	10.3 (16/16) (5.50/21.3)	N/A	15.6 (4/4) (11.5/21.3)	14 INDICATOR TEST WELL 201 ON-SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

Name of Facility: VERMONT YANKEE NUCLEAR POWER PLANT **DOCKET NUMBER:** 50-271
Location of Facility: VERNON, VT **REPORTING PERIOD:** 2009

MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
TEST WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	TRITIUM	16	3000	330 (0/16) (<220/<624)	N/A	335 (0/4) (<229/<624)	16 INDICATOR TEST WELL 202 ON-SITE	0
	GAMMA	16						
	K-40		N/A	30.0 (5/16) (<5.02/80.2)	N/A	41.7 (2/4) (<7.50/75.9)	18 INDICATOR TEST WELL 204 ON-SITE	0
	MN-54		15	1.52 (0/16) (<0.585/<3.19)	N/A	1.67 (0/4) (<0.749/<3.06)	16 INDICATOR TEST WELL 202 ON-SITE	0
	CO-58		15	1.62 (0/16) (<0.656/<3.14)	N/A	1.69 (0/4) (<0.823/<2.80)	16 INDICATOR TEST WELL 202 ON-SITE	0
	FE-59		30	3.51 (0/16) (<1.58/<6.42)	N/A	3.90 (0/4) (<2.24/<6.40)	16 INDICATOR TEST WELL 202 ON-SITE	0
	CO-60		15	1.59 (0/16) (<0.574/<2.86)	N/A	1.81 (0/4) (<1.16/<2.85)	16 INDICATOR TEST WELL 202 ON-SITE	0
	NB-95		15	1.70 (0/16) (<0.693/<3.06)	N/A	1.82 (0/4) (<0.925/<3.06)	16 INDICATOR TEST WELL 202 ON-SITE	0
	I-131		15	6.26 (0/16) (<4.24/<7.32)	N/A	6.71 (0/4) (<5.69/<7.12)	16 INDICATOR TEST WELL 202 ON-SITE	0

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TEST WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	CS-134		15	1.46 (0/16) (<0.539/<3.05)	N/A	1.56 (0/4) (<0.749/<2.80)	16 INDICATOR TEST WELL 202 ON-SITE	0
	CS-137		18	1.63 (0/16) (<0.600/<3.32)	N/A	1.84 (0/4) (<0.941/<3.32)	16 INDICATOR TEST WELL 202 ON-SITE	0
	BA-LA-140		15	3.83 (0/16) (<2.43/<5.78)	N/A	4.33 (0/4) (<3.65/<5.78)	16 INDICATOR TEST WELL 202 ON-SITE	0
SHORELINE WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	GROSS BETA	12	4	8.11 (12/12) (4.53/15.1)	N/A	11.3 (4/4) (5.25/15.1)	GZ-3 INDICATOR SHORELINE WELL ON-SITE	0
	TRITIUM	12	3000	385 (1/12) (<227/705)	N/A	455 (1/4) (<239/705)	GZ-3 INDICATOR SHORELINE WELL ON-SITE	0
	GAMMA K-40	12	N/A	63.7 (9/12) (<7.39/188)	N/A	93.5 (1/4) (<7.39/188)	GZ-3 INDICATOR SHORELINE WELL ON-SITE	0
	MN-54		15	1.60 (0/12) (<0.688/<3.14)	N/A	1.63 (0/4) (<0.742/<3.14)	GZ-5 INDICATOR SHORELINE WELL ON-SITE	0
	CO-58		15	1.73 (0/12) (<0.817/<3.31)	N/A	1.76 (0/4) (<0.840/<3.31)	GZ-5 INDICATOR SHORELINE WELL ON-SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

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SHORELINE WELLS (PCI/LITER) (Nuclear Energy Institute Groundwater Protection Initiative Samples)	FE-59		30	3.85 (0/12) (<2.02/<7.43)	N/A	3.89 (0/4) (<2.02/<7.33)	GZ-5 INDICATOR SHORELINE WELL ON-SITE	0
	CO-60		15	1.70 (0/12) (<0.802/<3.41)	N/A	1.73 (0/4) (<0.828/<3.41)	GZ-5 INDICATOR SHORELINE WELL ON-SITE	0
	NB-95		15	1.84 (0/12) (<0.895/<3.51)	N/A	1.86 (0/4) (<0.895/<3.47)	GZ-5 INDICATOR SHORELINE WELL ON-SITE	0
	I-131		15	6.11 (0/12) (<4.66/<7.33)	N/A	6.51 (0/4) (<5.23/<7.33)	GZ-5 INDICATOR SHORELINE WELL ON-SITE	0
	CS-134		15	1.52 (0/12) (<0.705/<3.07)	N/A	1.58 (0/4) (<0.728/<3.07)	GZ-5 INDICATOR SHORELINE WELL ON-SITE	0
	CS-137		18	1.70 (0/12) (<0.755/<3.38)	N/A	1.75 (0/4) (<0.811/<3.38)	GZ-3 INDICATOR SHORELINE WELL ON-SITE	0
	BA-LA-140		15	4.10 (0/12) (<3.10/<6.35)	N/A	4.21 (0/4) (<3.36/<6.35)	GZ-5 INDICATOR SHORELINE WELL ON-SITE	0
MILK (PCI/LITER)	I-131	90	1	0.486 (0/72) (<0.353/<0.961)	0.589 (0/18) (<0.429/<0.987)	0.589 (0/18) (<0.429/<0.987)	24 CONTROL COUNTY FARM 21.6 MILES N OF SITE	0
	SR-89	20	N/A	5.89	5.11	6.54	18 INDICATOR	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY FOR THE VERMONT YANKEE NUCLEAR POWER PLANT, 2009

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Location of Facility: VERNON, VT **REPORTING PERIOD:** 2009

MEDIUM OR PATHWAY SAMPLED (UNIT OF MEASUREMENT)	TYPES OF ANALYSES PERFORMED	NUMBER OF ANALYSES PERFORMED	REQUIRED LOWER LIMIT OF DETECTION (LLD)	INDICATOR LOCATIONS MEAN (F) RANGE	CONTROL LOCATION MEAN (F) RANGE	LOCATION WITH HIGHEST ANNUAL MEAN MEAN (F) RANGE	STATION # NAME DISTANCE AND DIRECTION	NUMBER OF NONROUTINE REPORTED MEASUREMENTS
MILK (PCI/LITER)				(0/16) (<2.30/<9.38)	(0/4) (<3.42/<6.42)	(0/4) (<2.77/<9.01)	BLODGETT FARM 3.6 MILES SE OF SITE	
	SR-90	20	N/A	1.42 (10/16) (0.722/3.05)	0.921 (2/4) (0.584/<1.20)	2.12 (4/4) (1.21/3.05)	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0
	GAMMA	90						
	BE-7		N/A	54.6 (0/72) (<39.2/<124)	62.4 (0/18) (<48.6/<76.2)	62.4 (0/18) (<48.6/<76.2)	24 INDICATOR COUNTY FARM 21.6 MILES N OF SITE	0
	K-40		N/A	1496 (72/72) (1239/2125)	1595 (18/18) (1341/1941)	1595 (18/18) (1341/1941)	24 CONTROL COUNTY FARM 21.6 MILES N OF SITE	0
	CS-134		15	6.17 (0/72) (<3.47/<14.1)	8.06 (0/18) (<4.38/<12.4)	8.06 (0/18) (<4.38/<12.4)	24 CONTROL COUNTY FARM 21.6 MILES N OF SITE	0
	CS-137		18	6.94 (0/72) (<4.72/<12.8)	8.20 (0/18) (<6.53/<9.45)	8.20 (0/18) (<6.53/<9.45)	24 CONTROL COUNTY FARM 21.6 MILES N OF SITE	0
	BA-LA140		15	7.81 (0/72) (<3.69/<13.8)	8.74 (0/18) (<6.23/<11.1)	8.74 (0/18) (<6.23/<11.1)	24 CONTROL COUNTY FARM 21.6 MILES N OF SITE	0
	RA-226		N/A	146 (15/72) (69.1/<290)	159 (5/18) (112/<216)	159 (5/18) (112/<216)	24 CONTROL COUNTY FARM 21.6 MILES N OF SITE	0

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MILK (PCI/LITER)	AC-TH228		N/A	25.3 (0/72) (<13.3/<52.6)	28.7 (0/18) (<17.8/<40.2)	28.7 (0/18) (<17.8/<40.2)	24 CONTROL COUNTY FARM 21.6 MILES N OF SITE	0
SILAGE (PCI/KG)	I-131	5	60	28.4 (0/4) (<21.1/<44.2)	20.2 (0/1) N/A	44.2 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0
	GAMMA	5						
	BE-7		N/A	1378 (4/4) (728/2790)	514 (1/1) N/A	2790 (1/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0
	K-40		N/A	5239 (4/4) (2952/11350)	3036 (1/1) N/A	11350 (1/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0
	CS-134		60	28.8 (0/4) (<22.4/<42.3)	16.5 (0/1) N/A	42.3 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0
	CS-137		80	28.5 (0/4) (<20.2/<45.3)	18.9 (0/1) N/A	45.3 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0
	RA-226		N/A	515 (0/4) (<334/<779)	359 (0/1) N/A	779 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0
	AC-TH228		N/A	124 (0/4) (<85.0/<193)	71.1 (0/1) N/A	192 (0/1) N/A	22 INDICATOR FRANKLIN FARM 9.7 MILES WSW OF SITE	0

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MIXED GRASS (PCI/KG)	I-131	21	60	36.2 (0/18) (<26.3/<51.5)	39.3 (0/3) (<30.9/<49.9)	39.3 (0/3) (<30.9/<49.9)	21 CONTROL SPOFFORD LAKE 16.4 MILES NNE OF SITE	0
	GAMMA	21						
	BE-7		N/A	3209 (12/18) (<177/9861)	2677 (2/3) (<280/5753)	3868 (2/3) (<306/9861)	12 INDICATOR N. HINSDALE, NH 3.6 MILES NNW OF SITE	0
	K-40		N/A	6707 (18/18) (4750/8204)	8773 (3/3) (7819/9528)	8773 (3/3) (7819/9528)	21 CONTROL SPOFFORD LAKE 16.4 MILES NNE OF SITE	0
	CS-134		60	39.7 (0/18) (<25.6/<52.6)	33.2 (0/3) (<28.4/<41.9)	46.0 (0/3) (<35.1/<52.6)	14 INDICATOR NORTHFIELD, MA 11.6 MILES SSE SITE	0
	CS-137		80	36.7 (0/18) (<27.3/<60.1)	45.6 (0/3) (<33.0/<56.4)	45.6 (0/3) (<33.0/<56.4)	21 CONTROL SPOFFORD LAKE 16.4 MILES NNE OF SITE	0
	RA-226		N/A	671 (6/18) (322/<881)	662 (3/3) (438/837)	777 (0/3) (<735/<830)	14 INDICATOR NORTHFIELD, MA 11.6 MILES SSE SITE	0
	AC-TH228		N/A	133 (0/18) (<89.1/<226)	156 (0/3) (<112/<197)	168 (0/3) (<106/<226)	15 INDICATOR TYLER HILL ROAD 3.1 MILES WNW OF SITE	0
FISH (PCI/KG)	GAMMA	4	N/A					
	K-40			4200 (2/2) (4021/4379)	3659 (2/2) (3638/3679)	4200 (2/2) (4021/4379)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

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FISH (PCI/KG)	MN-54		130	61.4 (0/2) (<52.0/<70.9)	48.7 (0/2) (<38.8/<58.6)	61.4 (0/2) (<52.0/<70.9)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0
	CO-58		130	50.0 (0/2) (<36.3/<63.8)	44.0 (0/2) (<42.1/<45.8)	50.0 (0/2) (<36.3/<63.8)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0
	FE-59		260	188 (0/2) (<144/<233)	94.1 (0/2) (<39.1/<149)	188 (0/2) (<144/<233)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0
	CO-60		130	58.7 (0/2) (<45.6/<71.8)	51.7 (0/2) (<29.7/<73.8)	58.7 (0/2) (<45.6/<71.8)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0
	ZN-65		260	159 (0/2) (<126/<191)	137 (0/2) (<103/<171)	159 (0/2) (<126/<191)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0
	CS-134		130	68.4 (0/2) (<44.4/<92.3)	44.8 (0/2) (<37.2/<52.4)	68.4 (0/2) (<44.4/<92.3)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0
	CS-137		150	64.3 (0/2) (<48.1/<80.5)	53.2 (0/2) (<45.7/<60.7)	64.3 (0/2) (<48.1/<80.5)	11 INDICATOR VERNON POND 0.6 MILES SSE OF SITE	0
DIRECT RADIATION (MILLI-ROENTGEN/STD.MO.)	TLD-QUARTERLY	157	N/A	6.65 (149/149) (4.61/9.43)	6.55 (8/8) (5.40/7.45)	8.71 (4/4) (7.92/9.43)	DR-08 INDICATOR SITE BOUNDARY 0.25 MILES SSW OF SITE	0

FRACTION OF DETECTABLE MEASUREMENTS AT SPECIFIED LOCATIONS IS INDICATED IN PARENTHESES (F)

TABLE 5.2

ENVIRONMENTAL TLD DATA SUMMARY
VERMONT YANKEE NUCLEAR POWER STATION, VERNON, VT
(JANUARY - DECEMBER 2009)

INNER RING TLD	OUTER RING TLD	OFFSITE STATION WITH HIGHEST MEAN	CONTROL TLDs
MEAN*	MEAN*	STA.NO./ MEAN*	MEAN*
RANGE*	RANGE*	RANGE*	RANGE*
(N0. MEASUREMENTS)**	(N0. MEASUREMENTS)**	(N0. MEASUREMENTS)**	(N0. MEASUREMENTS)**
6.5 ± 0.37	6.6 ± 0.38	DR-14 7.4 ± 0.46	6.55 ± 0.35
4.9 to 7.8	4.7 to 8.2	6.0 to 8.2	5.43 to 7.5
75	68	4	8

SITE BOUNDARY TLD WITH HIGHEST MEAN	SITE BOUNDARY TLD
STA.NO./ MEAN*	MEAN*
RANGE*	RANGE *
(NO. MEASUREMENTS)**	(NO. MEASUREMENTS)**
DR-45 16.8 ± 1.12	8.5 ± 0.52
13.8 to 16.8	5.5 to 16.8
4	60

* Units are in micro-R per hour.

** Each "measurement" is typically based on quarterly readings from five TLD elements.

TABLE 5.3

ENVIRONMENTAL TLD MEASUREMENTS
2009
(Micro-R per Hour)

Sta.		1ST QUARTER			2ND QUARTER			3RD QUARTER			4TH QUARTER			ANNUAL AVE.
No.	Description	EXP.		S.D.	EXP.		S.D.	EXP.		S.D.	EXP.		S.D.	EXP.
DR-01	River Sta. No. 3.3	5.84	±	0.26	6.35	±	0.43	6.02	±	0.25	6.29	±	0.33	6.1
DR-02	N Hinsdale, NH	5.41	±	0.33	7.10	±	0.57	6.79	±	0.22	6.85	±	0.31	6.5
DR-03	Hinsdale Substation	5.86	±	0.35	7.43	±	0.59	7.29	±	0.36	7.58	±	0.29	7.0
DR-04	Northfield, MA	5.54	±	0.25	6.48	±	0.48	6.54	±	0.26	6.26	±	0.32	6.2
DR-05	Spofford Lake, NH	5.40	±	0.29	7.45	±	0.58	7.40	±	0.35	7.28	±	0.30	6.9
DR-06	Vernon School	5.88	±	0.30	7.41	±	0.53	6.99	±	0.41	6.56	±	0.28	6.7
DR-07	Site Boundary	6.83	±	0.37	9.40	±	0.74	9.05	±	0.60	8.04	±	0.35	8.3
DR-08	Site Boundary	8.03	±	0.60	9.54	±	0.57	9.26	±	0.45	8.46	±	0.40	8.8
DR-09	Inner Ring	5.38	±	0.31	6.84	±	0.46	6.25	±	0.39	6.47	±	0.24	6.2
DR-10	Outer Ring	4.72	±	0.27	5.94	±	0.44	5.64	±	0.29	5.92	±	0.27	5.6
DR-11	Inner Ring	5.08	±	0.34	6.18	±	0.41	6.08	±	0.27	6.26	±	0.29	5.9
DR-12	Outer Ring	4.71	±	0.21	6.18	±	0.39	5.81	±	0.25	6.10	±	0.39	5.7
DR-13	Inner Ring	5.67	±	0.49	6.72	±	0.48	6.76	±	0.35	6.84	±	0.32	6.5
DR-14	Outer Ring	6.04	±	0.33	7.70	±	0.51	8.15	±	0.53	7.78	±	0.46	7.4
DR-15	Inner Ring	5.82	±	0.34	6.96	±	0.41	7.04	±	0.43	7.44	±	0.29	6.8
DR-16	Outer Ring	6.44	±	0.42	7.08	±	0.50	7.27	±	0.48	7.22	±	0.31	7.0
DR-17	Inner Ring	5.47	±	0.26	6.53	±	0.50	6.41	±	0.24	6.61	±	0.27	6.3
DR-18	Outer Ring	5.50	±	0.33	7.02	±	0.45	6.60	±	0.32	6.80	±	0.60	6.5
DR-19	Inner Ring	5.89	±	0.36	7.66	±	0.57	7.81	±	0.50	7.73	±	0.41	7.3
DR-20	Outer Ring	5.93	±	0.32	7.57	±	0.54	7.47	±	0.28	7.76	±	0.32	7.2
DR-21	Inner Ring	5.24	±	0.28	6.96	±	0.50	6.69	±	0.35	6.53	±	0.34	6.4
DR-22	Outer Ring	5.66	±	0.27	7.06	±	0.44	7.07	±	0.46	6.76	±	0.39	6.6
DR-23	Inner Ring		±		6.05	±	0.48	5.92	±	0.26	6.13	±	0.26	6.0
DR-24	Outer Ring	4.90	±	0.33	6.41	±	0.47	5.95	±	0.39	5.86	±	0.27	5.8
DR-25	Inner Ring	5.70	±	0.31	6.77	±	0.40	7.09	±	0.71	6.46	±	0.43	6.5
DR-26	Outer Ring	5.12	±	0.30	7.01	±	0.51	6.89	±	0.37	6.62	±	0.56	6.4
DR-27	Inner Ring	5.10	±	0.41	6.56	±	0.45	6.73	±	0.26	6.53	±	0.26	6.2
DR-28	Outer Ring	5.30	±	0.27	6.88	±	0.46	7.20	±	0.47	6.93	±	0.59	6.6
DR-29	Inner Ring	5.69	±	0.28	7.05	±	0.53	7.73	±	0.38	6.99	±	0.31	6.9
DR-30	Outer Ring	5.40	±	0.39	6.71	±	0.48	7.15	±	0.34	6.38	±	0.26	6.4
DR-31	Inner Ring	5.26	±	0.33	6.90	±	0.44	6.93	±	0.31	6.75	±	0.46	6.5
DR-32	Outer Ring	5.34	±	0.32	6.54	±	0.44	6.41	±	0.24	6.34	±	0.32	6.2
DR-33	Inner Ring	5.78	±	0.27	7.29	±	0.55	6.84	±	0.24	7.11	±	0.29	6.8
DR-34	Outer Ring	5.20	±	0.39	7.09	±	0.55	7.12	±	0.25	6.95	±	0.32	6.6
DR-35	Inner Ring	5.61	±	0.36	6.82	±	0.48	6.83	±	0.30	6.63	±	0.25	6.5
DR-36	Outer Ring	6.22	±	0.35	7.78	±	0.48	7.82	±	0.30	7.77	±	0.43	7.4
DR-37	Inner Ring	4.85	±	0.37	7.15	±	0.67	7.11	±	0.36	6.67	±	0.29	6.5
DR-38	Outer Ring	6.08	±	0.30	7.38	±	0.46	7.41	±	0.27	7.30	±	0.34	7.0
DR-39	Inner Ring	5.34	±	0.34	6.92	±	0.47	6.92	±	0.36	6.73	±	0.35	6.5
DR-40	Outer Ring	5.92	±	0.45	6.64	±	0.46	6.80	±	0.36	6.70	±	0.31	6.5

Note: Blank spaces indicate missing TLDs

TABLE 5.3 (cont.)

ENVIRONMENTAL TLD MEASUREMENTS
2009
(Micro-R per Hour)

Sta. No.	Description	1ST QUARTER EXP.	±	S.D.	2ND QUARTER EXP.	±	S.D.	3RD QUARTER EXP.	±	S.D.	4TH QUARTER EXP.	±	S.D.	ANNUAL AVE. EXP.
DR-07	Site Boundary	6.83	±	0.37	9.40	±	0.74	9.05	±	0.60	8.04	±	0.35	8.3
DR-08	Site Boundary	8.03	±	0.60	9.54	±	0.57	9.26	±	0.45	8.46	±	0.40	8.8
DR-41	Site Boundary	6.53	±	0.41	7.17	±	0.57	7.64	±	0.44	7.73	±	0.52	7.3
DR-42	Site Boundary	5.45	±	0.30	7.24	±	0.44	7.54	±	0.27	6.57	±	0.35	6.7
DR-43	Site Boundary	5.89	±	0.59	7.97	±	0.55	8.16	±	0.37	7.59	±	0.31	7.4
DR-44	Site Boundary	9.45	±	0.51	9.08	±	0.70	11.28	±	1.05	9.38	±	0.38	9.8
DR-45	Site Boundary	16.79	±	1.12	14.87	±	1.15	15.41	±	0.94	13.77	±	0.82	15.2
DR-46	Site Boundary	8.66	±	0.49	9.31	±	0.70	9.31	±	0.40	9.40	±	0.45	9.2
DR-47	Site Boundary	6.24	±	0.32	8.08	±	0.55	8.55	±	0.30	7.59	±	0.38	7.6
DR-48	Site Boundary	5.52	±	0.39	7.75	±	0.75	6.39	±	0.32	5.86	±	0.24	6.4
DR-49	Site Boundary	5.54	±	0.32	6.80	±	0.46	6.80	±	0.49	6.18	±	0.29	6.3
DR-50	Governor Hunt House	6.05	±	0.27	7.57	±	0.55	7.40	±	0.41	7.61	±	0.35	7.2
DR-51	Site Boundary	6.47	±	0.44	9.01	±	0.62	9.36	±	0.47	8.82	±	0.36	8.4
DR-52	Site Boundary	8.33	±	0.44	9.08	±	0.93	10.25	±	0.84	9.32	±	0.37	9.3
DR-53	Site Boundary	8.71	±	0.41	10.14	±	0.67	10.98	±	0.66	10.12	±	0.40	10.0

6. ANALYSIS OF ENVIRONMENTAL RESULTS

6.1 Sampling Program Deviations

Off-site Dose Calculation Manual Control 3.5.1 allows for deviations "if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of automatic sampling equipment and other legitimate reasons." In 2009, five deviations were noted in the REMP. These deviations did not compromise the program's effectiveness and are considered typical with respect to what is normally anticipated for any radiological environmental program. The specific deviations for 2009 were:

a) Thermoluminescent Dosimeter (TLD) DR-23 was determined to be missing during the first quarter 2009 TLD changeout during the week of March 30th, 2009. The TLD was located in a special holder on a telephone pole adjascent to Rte. 142 (Ft. Bridgman Road) near the north intersection with Stebbins Road in Vernon, Vermont. The holder as well as the TLD were missing. No trace of the holder or the TLD were found in the immediate area around the telephone pole. A new holder was affixed to the telephone pole and the TLD for the second quarter 2009 was placed in the holder. A condition report and a corrective action item were generated.

b) The South River Station River Water pump which provides a river water sample to the composite sampler at this location was found to be out of service on April 7, 2009. It was determined that the water pump had ceased function during river flood stage due to significant clogging with river silt. When the river flood stage subsided, the water pump was replaced and flow was restored to the sampler. A condition report and a corrective action item were generated.

c) The air sample station (AP/CF-11) located at the South River Station just off Stebbins Road in Vernon Vermont was found to be out of service during week 30-09 (July 29th, 2009). It was determined that a fuse had blown for an unknown reason, perhaps concurrent with a lightning storm in the area during the collection period. A new fuse was installed and the station was determined to be fully functional. The event was documented in a condition report and a corrective action item was generated.

d) The air sample station (AP/CF-11) was found to be out of service during the weekly collection of air samples on August 5th, 2009 (Week 31-09). This station is located at the South River Station just off Stebbins Road in Vernon, Vermont. A similar event had occurred at the end of the previous sample collection period (see section c) above). A complete changeout of the sample rack was performed at this time. The damaged sample rack was returned to the plant for rebuild. The system was restored to function with the new sample rack and no further outages were experienced at this station to the present. The event was documented in a condition report and a corrective action item was generated.

e) During a review of air sample collection data from the Northfield Massachusetts Air Sample station (AP/CF-14) it was determined that approximately 6 hours of sample collection time had been lost during week 48-09. The station was functioning properly on November 24th and again on December 1st but sometime between these dates had shutdown for the six hour period. No other problems were observed with this station. It is believed that power line maintenance was performed on a couple of days during this week long period. A condition report was generated and an corrective action item was opened.

f) Air sample station outages are reflected in the air sample collection time percentages listed below.

AP/CF #	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
11	99.9%	100%	90.9%	99.0%
12	99.9%	99.9%	99.6%	99.0%
13	99.9%	100%	100%	99.0%
14	99.9%	100%	100%	98.9%
15	99.9%	100%	100%	99.1%
21	99.9%	99.9%	100%	99.1%
40	99.7%	99.8%	100%	98.7%

6.2 Comparison of Achieved LLDs with Requirements

Table 4.5.1 of the VYNPS ODCM (also shown in Table 4.4 of this report) gives the required Lower Limits of Detection (LLDs) for environmental sample analyses. On occasion, an LLD is not achievable due to a situation such as a low sample volume caused by sampling equipment malfunction or limited sample availability. In such a case, ODCM 10.2 requires a discussion of the situation. At the contracted environmental laboratory, the target LLD for the majority of analyses is 50 percent of the most restrictive required LLD. Expressed differently, the typical sensitivities achieved for each analysis are at least 2 times greater than that required by the VYNPS ODCM.

For each analysis having an LLD requirement in ODCM Table 4.5.1, the *a posteriori* (after the fact) LLD calculated for that analysis was compared with the required LLD. During 2009, all sample analyses performed for the REMP program achieved an *a posteriori* LLD less than the corresponding LLD requirement.

6.3 Comparison of Results with Reporting Levels

ODCM Section 10.3.4 requires written notification to the NRC within 30 days of receipt of an analysis result whenever a Reporting Level in ODCM Table 3.5.2 is exceeded. Reporting Levels are the environmental concentrations that relate to the ALARA design dose objectives of 10 CFR 50, Appendix I. Environmental concentrations are averaged over the calendar quarters for the purposes of this comparison. The Reporting Levels are intended to apply only to measured levels of radioactivity due to plant effluents. During 2009, no analytical result exceeded a corresponding reporting level requirement in Table 3.5.2 of the ODCM.

6.4 Changes in Sampling Locations

The Vermont Yankee Nuclear Power Station Off-Site Dose Calculation Manual Section 10.2 states that if "new environmental sampling locations are identified in accordance with Control 3.5.2, the new locations shall be identified in the next Annual Radiological Environmental Operating Report." There were no required sampling location changes due to the Land Use Census conducted in 2009.

This year Vermont Yankee is continuing to add data from the on-site air sampling station, AP/CF 40, at the Governor Hunt House. This location has been used continuously as a demonstration since early in the program, but the data had not previously been included in this report.

6.5 Data Analysis by Media Type

The 2007 REMP data for each media type is discussed below. Whenever a specific measurement result is presented, it is given as the concentration in the units of the sample (volume or weight). An analysis is considered to yield a "detectable measurement' when the concentration exceeds three times the standard deviation for that analysis and is greater than or equal to the Minimum Detectable Concentration (MDC) for the analysis. With respect to data plots, all net concentrations are plotted as reported, without regard to whether the value is "detectable" or "non-detectable." In previous years, we had converted values that were less than the MDC to zero.

6.5.1 Airborne Pathways

6.5.1.1 Air Particulates (AP)

The periodic air particulate filters from each of the seven sampling sites were analyzed for gross-beta radioactivity. At the end of each quarter, the filters from each sampling site were composited for a gamma analysis. The results of the air particulate sampling program are shown in Table 5.1 and Figures 6.1 through 6.7.

Gross beta activity was detected in all air particulate filters that were analyzed. As shown in Figure 6.1, there is no significant difference between the quarterly average concentrations at the indicator (near-plant) stations and the control (distant from plant) stations. Notable in Figure 6.1 is a distinct annual cycle, with the minimum concentration in the second quarter, and the maximum concentration in the first quarter.

Figures 6.2 through 6.7 show the weekly gross beta concentration at each air particulate sampling location compared to the control air particulate sampling location at AP-21 (Spofford Lake, NH). Small differences are evident and expected between individual sampling locations. Figure 6.2 clearly demonstrates the distinct annual cycle, with the minimum concentration in the second quarter, and the maximum concentration in the first quarter. It can be seen that the gross-beta measurements on air particulate filters fluctuate significantly over the course of a year. The measurements from control station AP-21 vary similarly, indicating that these fluctuations are due to regional changes in naturally-occurring airborne radioactive materials, and not due to Vermont Yankee operations.

There were two naturally-occurring gamma-emitting radionuclides detected on the air particulate filters during this reporting period. Be-7, a naturally-occurring cosmogenic radionuclide, was detected on 28 of 28 filter sets analyzed. K-40 was detected on one out of 28 analyzed. Ra-226 and Ac/Th-228 were not detected in the 28 filter sets analyzed.

6.5.1.2 Charcoal Cartridges (CF)

Charcoal cartridges from each of the seven air sampling sites were analyzed for I-131 each time they were collected. The results of these analyses are summarized in Table 5.1. As in previous years, no I-131 was detected in any charcoal cartridge.

6.5.2 Waterborne Pathways

6.5.2.1 River Water (WR)

Aliquots of river water were automatically collected periodically from the Connecticut River downstream from the plant discharge area and hydro station, location WR-11, with the exception of the two events of short duration when the sampling equipment was out of service (see Section 6.1). Monthly grab samples were also collected at the upstream control location, also on the Connecticut River, location WR-21. The composited samples at WR-11 were collected monthly and sent along with the WR-21 grab samples to the contracted environmental laboratory for analysis. Table 5.1 shows that gross-beta measurements were positive in 12 out of 12 indicator samples and 9 out of 12 control samples, as would be expected, due to naturally-occurring radionuclides in the water. As seen in Figure 6.8, the mean concentration of the indicator locations was similar to the mean concentration at the control location in 2009.

For each sampling site, the monthly samples were composited into quarterly samples for H-3 (Tritium)

analyses. None of the samples contained detectable quantities of H-3.

There was one naturally-occurring gamma-emitting radionuclides detected in river water samples during this reporting period. Ra-226, a naturally-occurring primordial radionuclide, was detected in 13 of 24 samples analyzed.

6.5.2.2 Ground Water – Potable Drinking Water (WG)

Quarterly ground water (deep wells supplying drinking water to the plant and selected offsite locations) samples were collected from four indicator locations (only one is required by VYNPS ODCM) and one control location during 2009. WG-13 (COB Well), an on-site well location, has been routinely sampled since the second half of 1996. In 1999, WG-14 (PBS Well) another on-site well location was added to the program. Table 5.1 and Figure 6.9 show that gross-beta measurements were positive in 16 out of 16 indicator samples and in 4 out of 4 control samples. The beta activity is due to naturally-occurring radionuclides in the water. The levels at all sampling locations, including the higher levels at station WG-13, were consistent with those detected in previous years. Naturally occurring Ra-226 was also detected in four samples and is naturally-occurring. No other gamma-emitting radionuclides or tritium were detected in any of the samples.

6.5.2.3 Sediment (SE)

Semi-annual river sediment grab samples were collected from two indicator locations during 2009. The North Storm Drain Outfall location (SE-12) is an area where up to 40 different locations can be sampled within a 20 ft by 140 ft area. In 2009, 18 locations were sampled at SE-12 during each of the semi-annual collections. Two samples were collected at SE-11 during the year. Be-7 was detected in two of the 36 samples analyzed. As would be expected, naturally-occurring Potassium-40 (K-40) was detected in all of the samples. Cobalt-60 was detected in one of the 36 samples. Radium-226 (Ra-226) was detected in 27 of 36 samples. Actinium-228 was detected in 31 of 36 samples. Thorium-228 (Th-228) was detected in all 36 samples analyzed. Thorium-232 (Th-232) was detected in all 36 samples analyzed. Urainium-238 (U-238) was not detected in any of the 36 samples. Cesium-137 (Cs-137) was detected in 26 out of 34 of the indicator samples and none of the two control samples. The levels of Cs-137 measured were consistent with what has been measured in the previous several years and with those detected at other New England locations. Other plant-related radionuclides are reported in trace quantities in Table 5.1 SE. Also see section 6.5.2.6 for more information.

6.5.2.4 Test Wells (WT)

During 1996, sampling was initiated at test wells around the outer edges of an area in the south portion of the VYNPS site where septic sludge is spread. This sampling continued through 2009. The test well

locations are shown on Figure 4.1 and the results are summarized in Table 5.1 under the media category, Test Well (WT). In 2009, four samples were taken at each of the four locations and all were analyzed for gamma isotopic, gross beta and H-3 activity.

Prior to the gross beta analysis, each sample was filtered through a 0.45 micron Gelman Tuffryn membrane filter. Gross beta activity was detected in all 16 samples collected with levels ranging from 5.5 to 21.3 pCi/kg. K-40 was also detected in five of the 16 samples. No other radionuclides were detected.

6.5.2.5 Storm Drain System

The presence of plant-related radionuclides in the onsite storm drain system has been identified in previous years at Vermont Yankee (VY). As a consequence, a 50.59 evaluation of radioactive materials discharged via the storm drain system was performed in 1998. This assessment was in response to Information and Enforcement Bulletin No. 80-10 and NRC Information Notice No. 91-40. The evaluation demonstrated that the total curies released via the VYNPS storm drain system are not sufficient to result in a significant dose (i.e. dose does not exceed 10% of the technical specification objective of 0.3 millirem per year to the total body, and 1.0 millirem per year to the target organ for the maximally exposed receptor). Water and sediment in the onsite storm drain system was routinely sampled throughout 2009 at various points. The results of this sampling are summarized below.

Sediment samples were taken from the storm drain system at onsite manhole locations in 2009 for a total of 15 samples. All samples were analyzed for gamma emitting isotopes. Table 6-1 summarizes the analytical results of the sediment samples. The naturally-occurring isotope Ra-226 was found in 10 of 15 samples as expected. The highest detected concentration for all plant-related radionuclides that were detected in sediment samples was found in sample SE-95, which is also designated by the plant as Manhole 12.

Table 6.1

Summary of Storm Drain System Sediment Sample Analyses*

Isotope	No. Detected**	Mean (pCi/kg)	Range (pCi/kg)	Station With Highest Detected Concentration
Ra-226	10/15	13.5 E 2	(0.78– 2.04) E 3	MH-12A (SE-92)
Cs-137	3/15	1.3 E 2	(0.37 – 6.52) E 2	MH-12 (SE-95)
Mn-54	1/15	0.5 E 2	(0.34 – 0.94) E 2	MH-12 (SE-95)
Co-60	3/15	1.6 E 2	(0.32 – 9.81) E 2	MH-12 (SE-95)
Zn-65	1/15	1.2 E 2	(0.58 – 4.20) E 2	MH-12 (SE-95)

* Radionuclides that were not detected in any sample are not listed

** The fraction of sample analyses yielding detectable measurements (i.e. >3 standard deviations). The mean and the range are determined only from the samples where activity was >3 standard deviations.

Water samples were taken from the storm drain system at various access points in 2009 including Manholes MH-8, MH-11H, MH-12A, MH-13, and MH-14. Table 6-2 summarizes the analytical results of water samples from the storm drain system (MH-12A and MH-14) in 2009. Naturally-occurring Ra-226 was detected in 12 of the samples. Low levels of gross beta activity were detected in 23 of 24 samples analyzed, at concentrations that are typical of any environmental water sample. Tritium (H-3) was not detected in the 24 samples analyzed.

In 1998, an additional dose assessment was performed that incorporated all of the 1998 storm drain system analytical results (including both sediment and water). The dose assessment was performed using the maximum measured concentration of radionuclides in 1998, and a conservative estimate of the volume of sediment and water discharged via the storm drain system. The results of this dose assessment are estimates of the total body and maximum organ dose equaling 3.2% and 1.6% of the corresponding Technical Specification dose limits respectively. Therefore, there was no significant dose impact from plant-related radionuclides in the storm drain system in 1998. The sampling conducted in 2009 indicates that the presence of radionuclides in the storm drain system has not changed significantly. Therefore, the storm drain system remains an insignificant impact to dose. The VYNPS staff will continue to monitor the presence of plant related radionuclides in the storm drain system.

Table 6.2

Summary of Storm Drain System Water Sample Analyses*

Isotope	No. Detected **	Mean (pCi/L)	Range (pCi/L)	Station With Highest Detected Concentration
Gross Beta	23/24	3.5 E 0	(0.8 – 8.1) E 0	MH-12A (WW-12)
H-3	0/24	NA	NA	-
Ra-226	12/24	1.2E 2	(0.64 – 1.6) E 2	MH-12A (WW-12)
I-131	0/24	NA	NA	-
Cs-134	0/24	NA	NA	-
Cs-137	0/24	NA	NA	-
ZrNb-95	0/24	NA	NA	-
Co-58	0/24	NA	NA	-
Mn-54	0/24	NA	NA	-
Zn-65	0/24	NA	NA	-
Fe-59	0/24	NA	NA	-
Co-60	0/24	NA	NA	-
Ba/La-140	0/24	NA	NA	-

* Radionuclides that were not detected in any sample are not listed

** The fraction of sample analyses yielding detectable measurements (i.e. >3 standard deviations).

6.5.2.6 Air Compressor Condensate and Manhole Sampling Results

The presence of tritium in station air compressor condensate and manholes (Storm Drain System) has been identified since 1995 (ER_95-0704). An evaluation has been performed (S.R.1592) which states "...leakage of tritium found in the storm drains (manholes) to ground water beneath the site will be transported by natural ground water gradient to the Connecticut River. However, at the current measured concentrations and postulated leak rate from the storm drains, the offsite dose impact is not significant (<2.4E-5 mrem/year)." Data provided in Table 6.3 will be filed under the requirements of 10CFR50.75(g) and is presented here in response to ER_95-0704_04 commitments.

6.5.2.7 Shoreline Groundwater Monitoring Wells Samples Results (WS)

Tritium at concentrations higher than background levels was detected in one of the three shoreline groundwater monitoring wells installed in 2007 in response to industry events and Entergy's response to Nuclear Electrical Institute's (NEI's) Groundwater Protection Initiative 07-07. The sample collected in

the fourth quarter 2009 from shoreline well GZ-3 was determined to contain tritium at approximately 705 picocuries per liter. This concentration is just slightly above minimum detectable concentration for this radionuclide at our offsite environmental laboratory. When this data was received at the Vermont Yankee plant site on January 6th, 2010, extensive investigation and corrective actions were undertaken to find the source of trititated water contamination into the subsurface groundwater layer and to curtail the release pathway. Further steps to remediate the contamination of the subsurface groundwater layer under the plant site have been initiated. More detail of this event is provided in the 2009 Annual Radioactive Effluent Release Report

Table 6.3

Summary of Air Compressor Condensate and Manhole Water Tritium Concentrations*

Sample Location	No. Detected**	Mean (microcuries/ml)	Range (microcuries/ml)
Air Compressor Condensate	7/10	8.02E-5	(1.70– 16.0) E-5
Manhole 11H	0/6	None Detected	None Detected
Manhole 13	0/8	None Detected	None Detected
Manhole 8	0/8	None Detected	None Detected

* Reported per ER_950704_04.

** The fraction of sample analyses yielding detectable measurements

6.5.3 Ingestion Pathways

6.5.3.1 Milk (TM)

Milk samples from cows at several local farms were collected monthly during 2009. Twice-per-month collections were made during the "pasture season" since the milking cows or goats were identified as being fed pasture grass during that time. Each sample was analyzed for I-131 and other gamma-emitting radionuclides. Quarterly composites (by location) were analyzed for Sr-89 and Sr-90.

As expected, naturally-occurring K-40 was detected in all samples. Also expected was Sr-90. Sr-90 was detected in 10 out of 16 indicator samples and 2 out of 4 control samples. Although Sr-90 is a by-product of nuclear power plant operations, the levels detected in milk are consistent with that expected from worldwide fallout from nuclear weapons tests, and to a much lesser degree from fallout from the Chernobyl incident. The Sr-90 levels shown in Table 5.1 and Figure 6.11 are consistent with those detected at other New England farms participating in other plant environmental monitoring programs. This radionuclide and Cs-137 are present throughout the natural environment as a result of atmospheric nuclear weapons testing that started primarily in the late 1950's and continued through 1980. They are found in soil and vegetation, as well as anything that feeds upon vegetation, directly or indirectly. The

detection of Cs-137 in environmental milk samples is expected and has been detected in previous years. Cs-137 was not detected in any of the 90 samples in 2009. See Figure 6.10. It should be noted here that most of the Cs-137 concentrations and many of the Sr-90 concentrations shown on Figures 6.10 and 6.11, respectively, are considered "not detectable." All values have been plotted, regardless of whether they were considered statistically significant or not. As shown in these figures, the levels are also consistent with those detected in previous years near the VYNPS plant. There is also little actual difference in concentrations between farms.

6.5.3.2 Silage (TC)

A silage sample was collected from each of the required milk sampling stations during October. Each of these was analyzed for gamma-emitting radionuclides and I-131. As expected with all biological media, naturally-occurring Be-7 and K-40 were detected in all samples. Naturally-occurring Ra-226 was not detected in any of the five samples. No Cs-137 or I-131 was detected in any sample.

6.5.3.3 Mixed Grass (TG)

Mixed grass samples were collected at each of the air sampling stations on three occasions during 2009. As expected with all biological media, naturally-occurring Be-7 was detected in 14 of the 21 samples. Naturally-occurring K-40 was detected in all samples. Naturally-occurring Ra-226 was detected in nine of the 21 samples. Cs-137 was not detected in any of the samples.

6.5.3.4 Fish (FH)

Semiannual samples of fish were collected from two locations in both spring and fall of 2009. Several species are collected such as Walleye, Small Mouth Bass, Large Mouth Bass, Yellow Perch, White Perch, and Rock Bass. The edible portions of each of these were analyzed for gamma-emitting radionuclides. As expected in biological matter, naturally-occurring K-40 was detected in all samples.

As shown in Table 5.1, Cs-137 was not detected in this year's samples. It should be noted that most of the Cs-137 concentrations plotted in Figure 6.12 are considered "not detectable." All values were plotted regardless of whether they were considered statistically significant or not. The Cs-137 levels plotted for 2009 and previous years are typical of concentrations attributable to global nuclear weapons testing fallout.

No other radionuclides were detected.

6.5.4 Direct Radiation Pathway

Direct radiation was continuously measured at 53 locations surrounding the Vermont Yankee plant with the use of thermoluminescent dosimeters (TLDs).

In 1999, DR-53 was added on the site boundary. The TLDs are collected every calendar quarter for readout at the environmental laboratory. The complete summary of data may be found in Table 5.3.

From Tables 5.2 and 5.3 and Figure 6.13, it can be seen that the Inner and Outer Ring TLD mean exposure rates were not significantly different in 2009. This indicates no significant overall increase in direct radiation exposure rates in the plant vicinity. It can also be seen from these tables that the Control TLD mean exposure rate was not significantly different than that at the Inner and Outer Rings. Figure 6.13 also shows an annual cycle at both indicator and control locations. The lowest point of the cycle occurs usually during the winter months. This is due primarily to the attenuating effect of the snow cover on radon emissions and on direct irradiation by naturally-occurring radionuclides in the soil. Differing amounts of these naturally-occurring radionuclides in the underlying soil, rock or nearby building materials result in different radiation levels between one field site and another

Upon examining Figure 6.17, as well as Table 5.2, it is evident that in recent years, station DR-45 had a higher average exposure rate than any other station. This location is on-site, and the higher exposure rates are due to plant operations and activities in the immediate vicinity of this TLD. There is no significant dose potential to the surrounding population or any real individual from these sources since they are located on the back side of the plant site, between the facility and the river. The same can be said for station DR-46, which has shown higher exposure rates in previous years.

Environmental Program Trend Graphs

2009 Radiological Environmental Operating Report
Vermont Yankee

Graphs:

6.1 – Gross Beta Measurements on Air Particulate Filters (Average Concentrations)
6.2 – Gross Beta Measurements on Air Particulate Filters (11)
6.3 – Gross Beta Measurements on Air Particulate Filters (12)
6.4 – Gross Beta Measurements on Air Particulate Filters (13)
6.5 – Gross Beta Measurements on Air Particulate Filters (14)
6.6 – Gross Beta Measurements on Air Particulate Filters (15)
6.7 – Gross Beta Measurements on Air Particulate Filters (40)
6.8 – Gross Beta Measurement on River Water (Average Concentrations)
6.9 – Gross Beta Measurement on Potable Groundwater (Average Concentrations)
6.10 – Cesium-137 in Milk (Annual Average Concentrations)
6.11 - Strontium 90 in Milk (Annual Average Concentrations)
6.12 – Cesium-137 in Fish (Annual Average Concentrations)
6.13 – Exposure Rate at Inner Ring, Outer Ring, and Control TLDS
6.14 – Exposure Rate at Indicator TLDS, DR01-03
6.15 – Exposure Rate at Indicator TLDS, DR 06,50
6.16 – Exposure Rate at Site Boundary TLDS, DR 07 - 08, 41 - 42
6.17 – Exposure Rate at Site Boundary TLDS, DR 43-46
6.18 – Exposure Rate at Site Boundary TLDS, DR 47-49, 51-53
6.19 – Exposure Rate at Inner Ring TLDS, DR 09-15(odd)
6.20 – Exposure Rate at Inner Ring TLDS, DR-17-23 (odd)
6.21 – Exposure Rate at Inner Ring TLDS,DR 25-31 (odd)
6.22 - Exposure Rate at Inner Ring TLDS, DR 33-39 (odd)
6.23 – Exposure Rate at Outer Ring TLDS, DR 10 - 16 (even)
6.24 – Exposure Rate at Outer Ring TLDS, DR 18-24 (even)
6.25 – Exposure Rate at Outer Ring TLDS, DR 26-32 (even)
6.26 – Exposure Rate at Outer Ring TLDS, DR 34-40 (even)
6.27 – Exposure Rate at Control TLDS, DR 04-05

Figure 6.1 - Gross Beta Measurements on Air Particulate Filters - Quarterly Average Concentrations

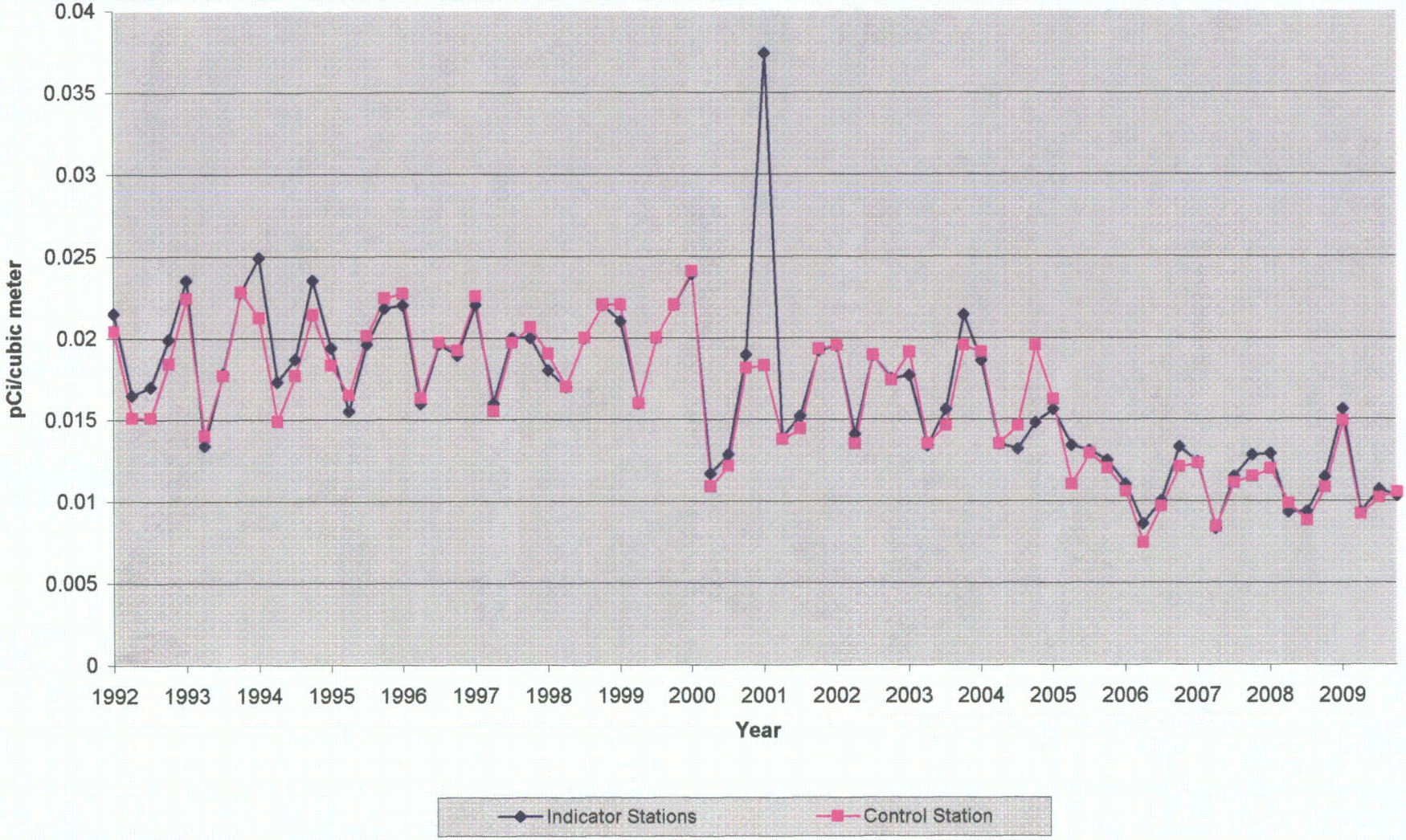


Figure 6.2 - Gross Beta Measurements on Air Particulate Filters

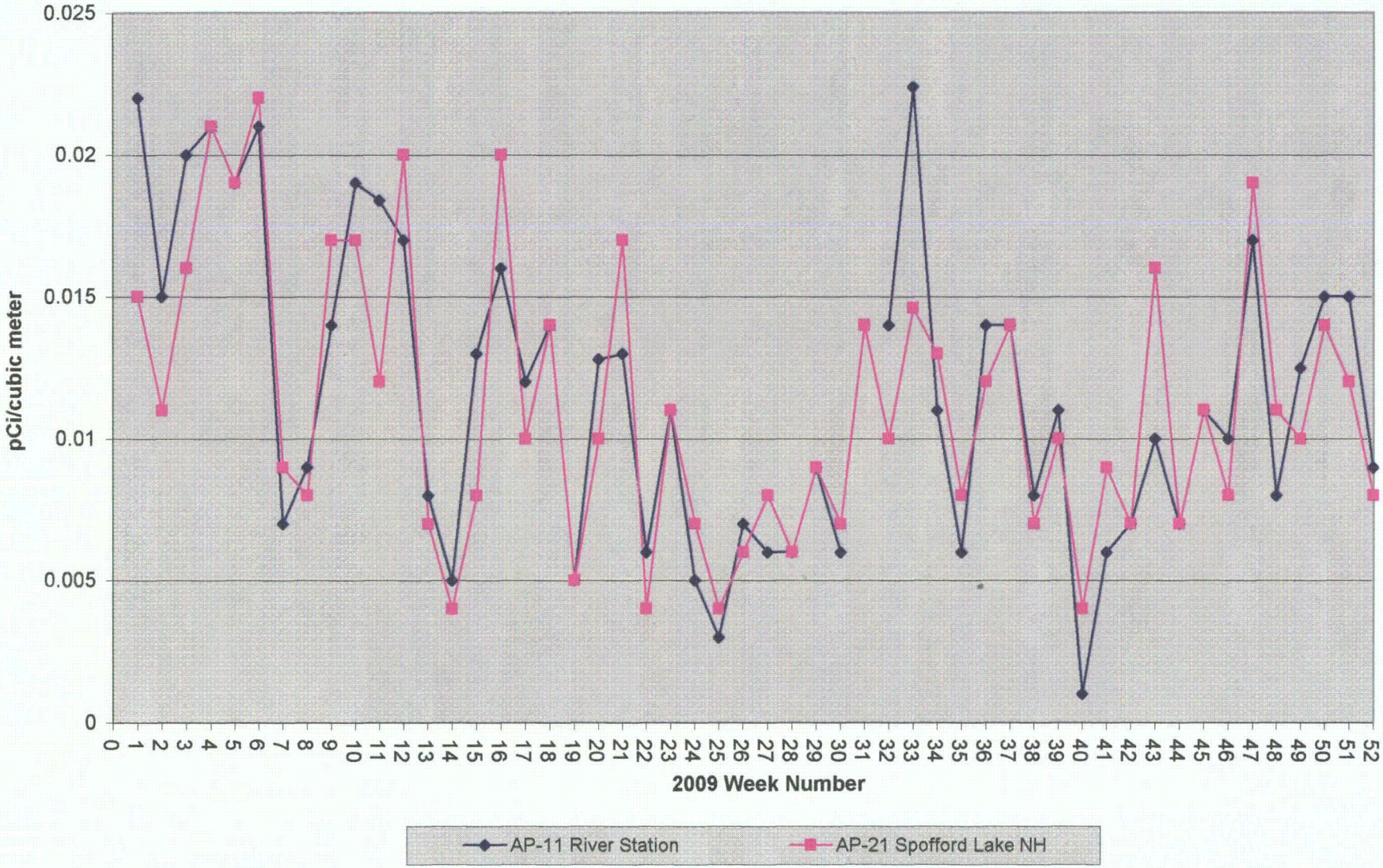


Figure 6.3 - Gross Beta Measurements on Air Particulate Filters

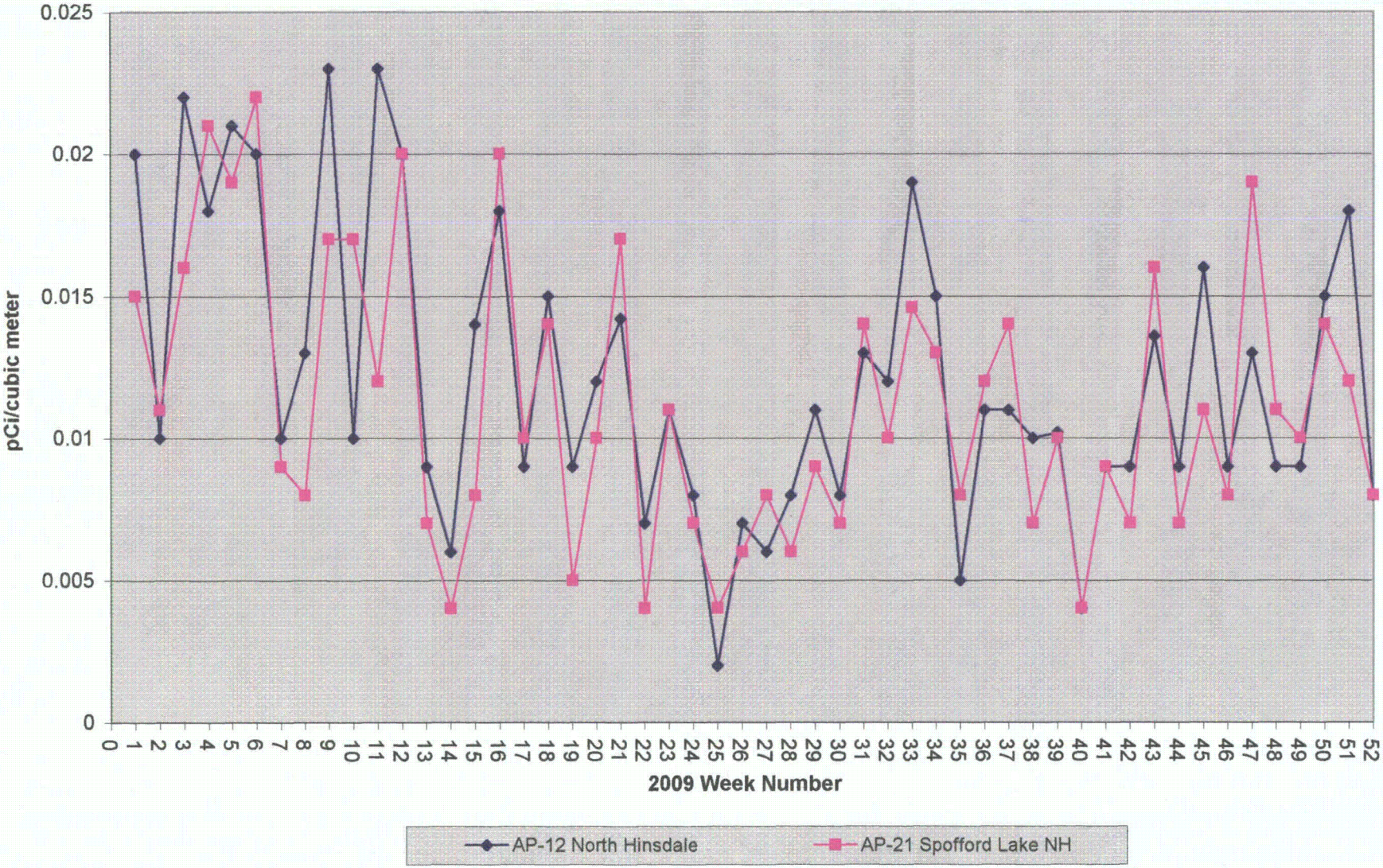


Figure 6.4 - Gross Beta Measurements on Air Particulate Filters

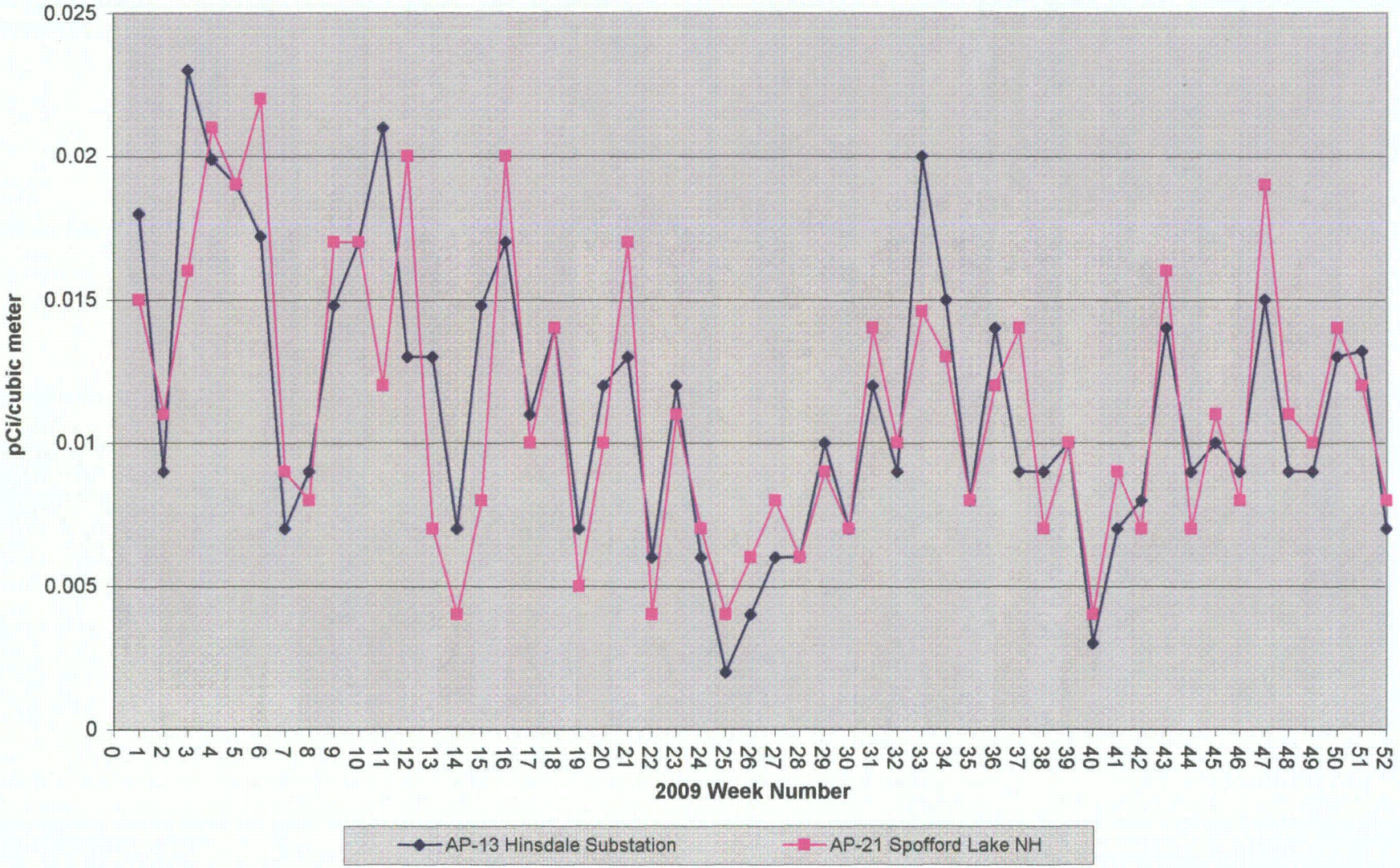


Figure 6.5 - Gross Beta Measurements on Air Particulate Filters

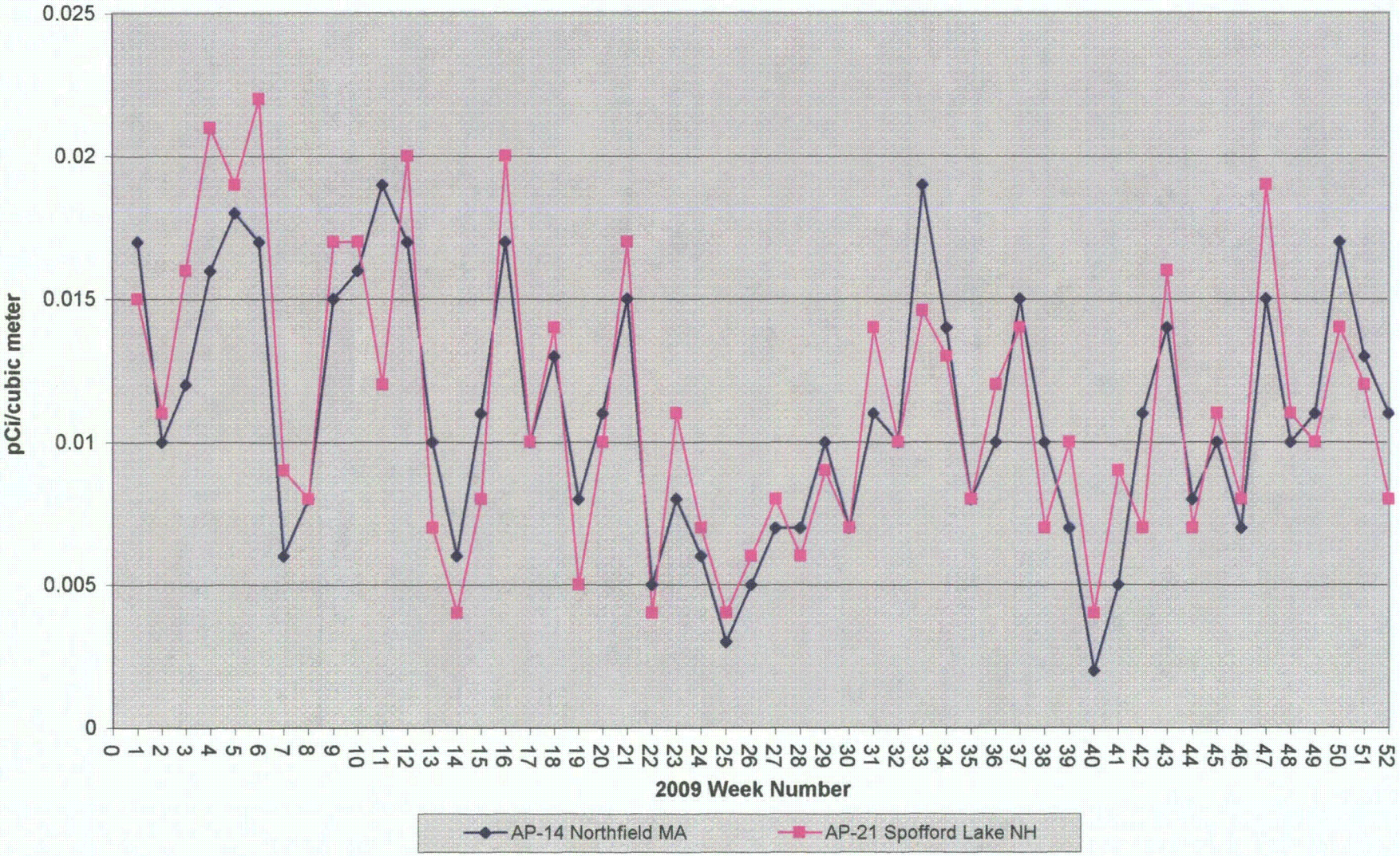


Figure 6.6 - Gross Beta Measurements on Air Particulate Filters

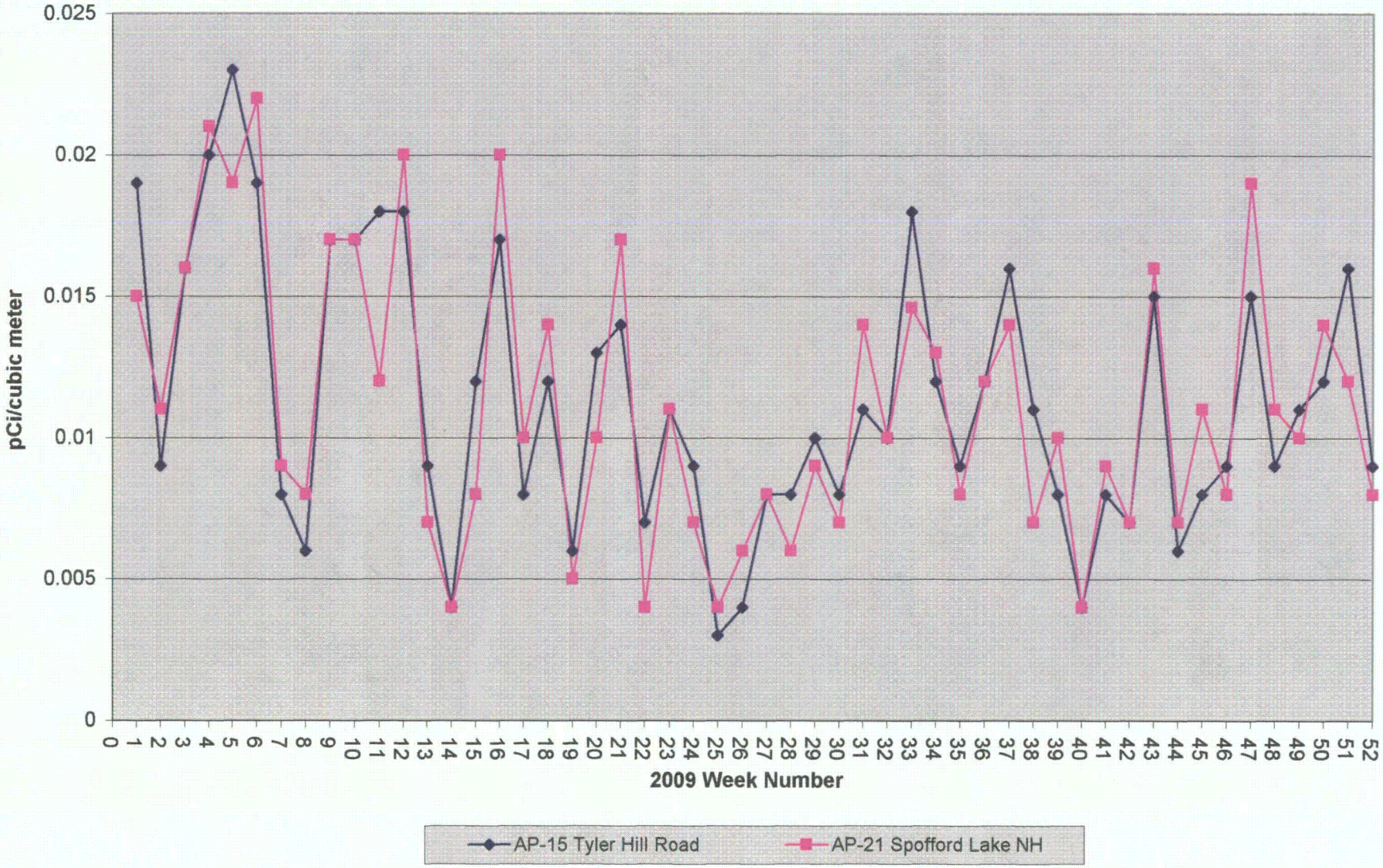


Figure 6.7 - Gross Beta Measurements of Air Particulate Filters

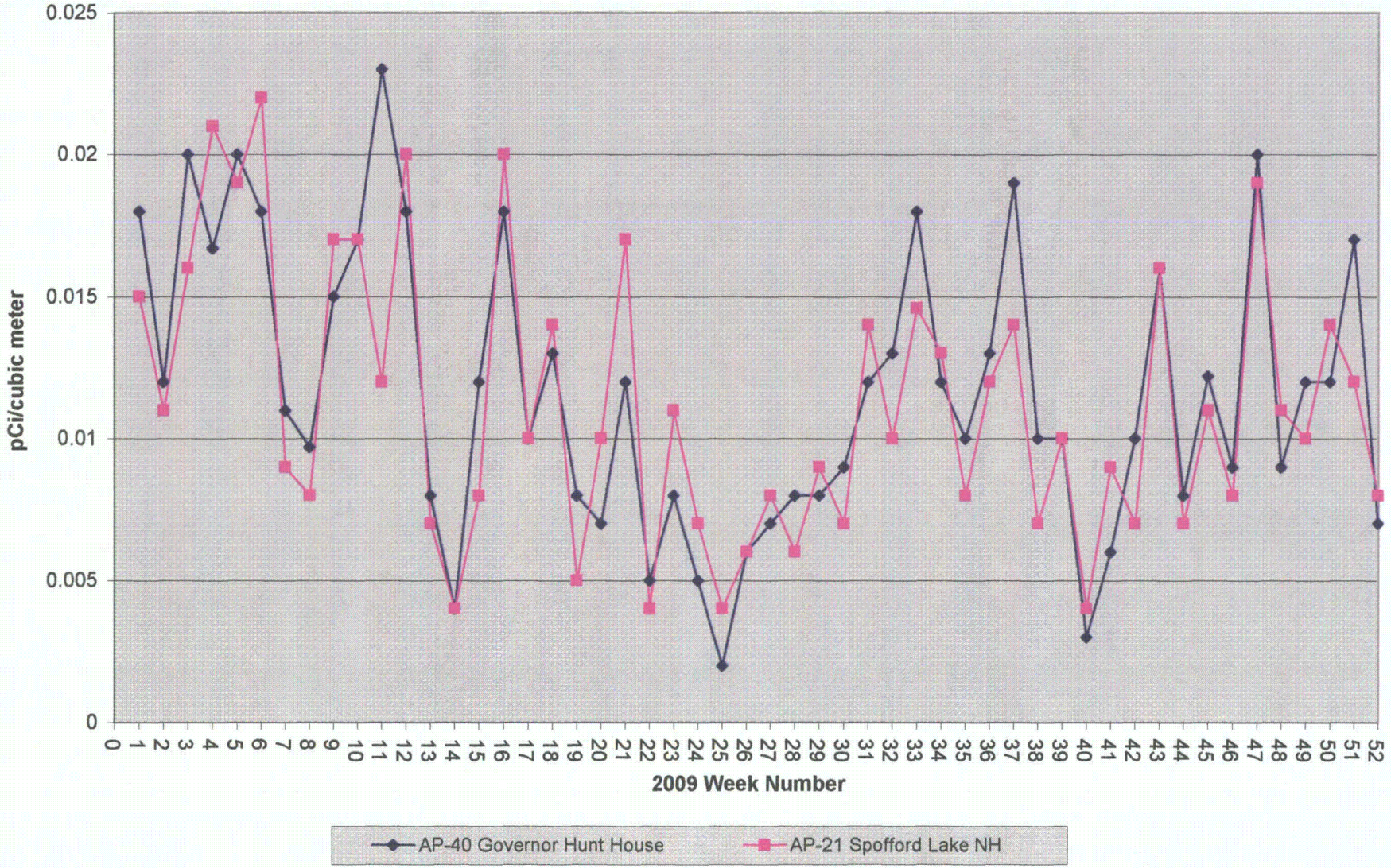


Figure 6.8 - Gross Beta Measurements on
River Water Semi-Annual Average Concentration

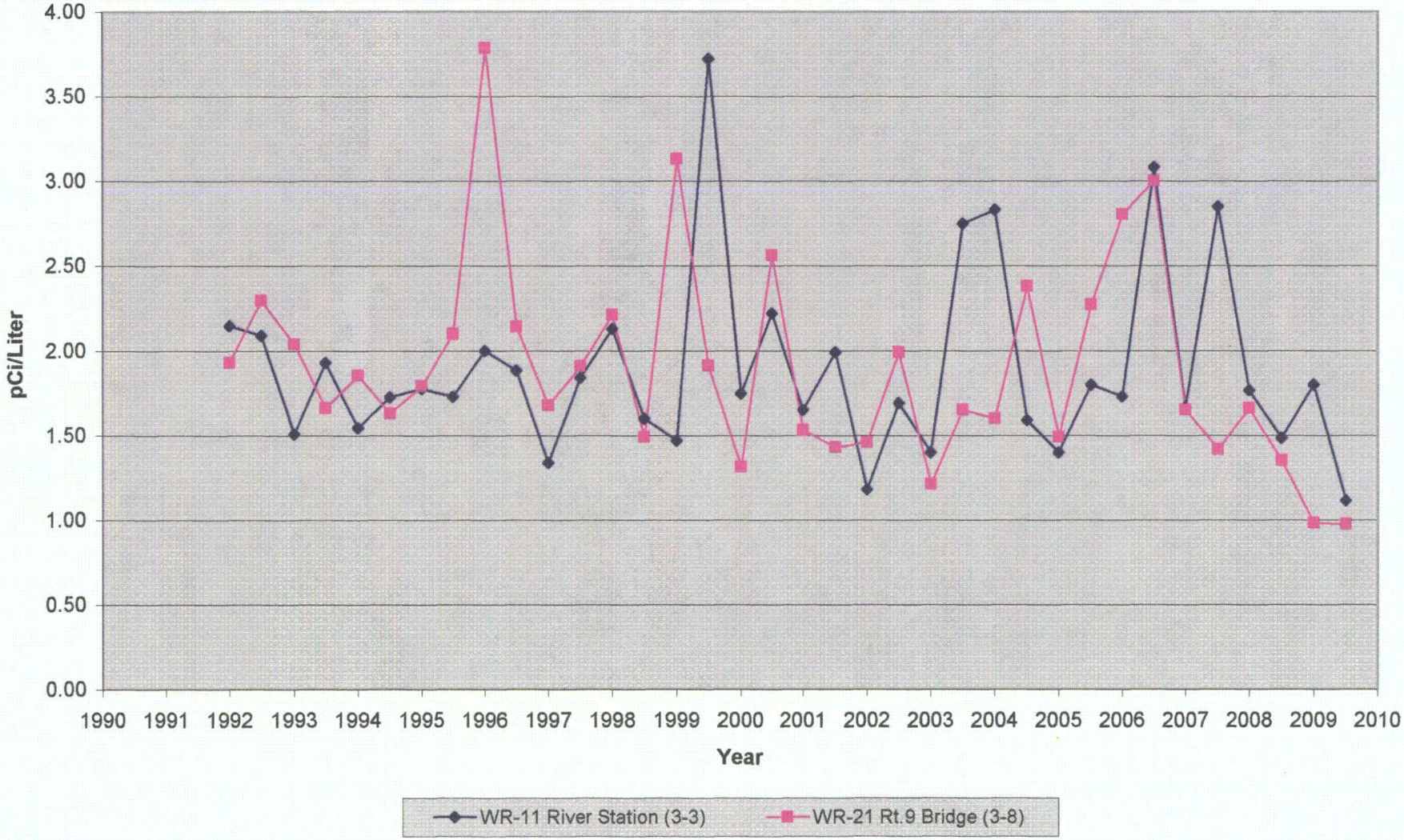


Figure 6.9 - Gross Beta Measurements on Potable Groundwater Semi-Annual Average Concentrations

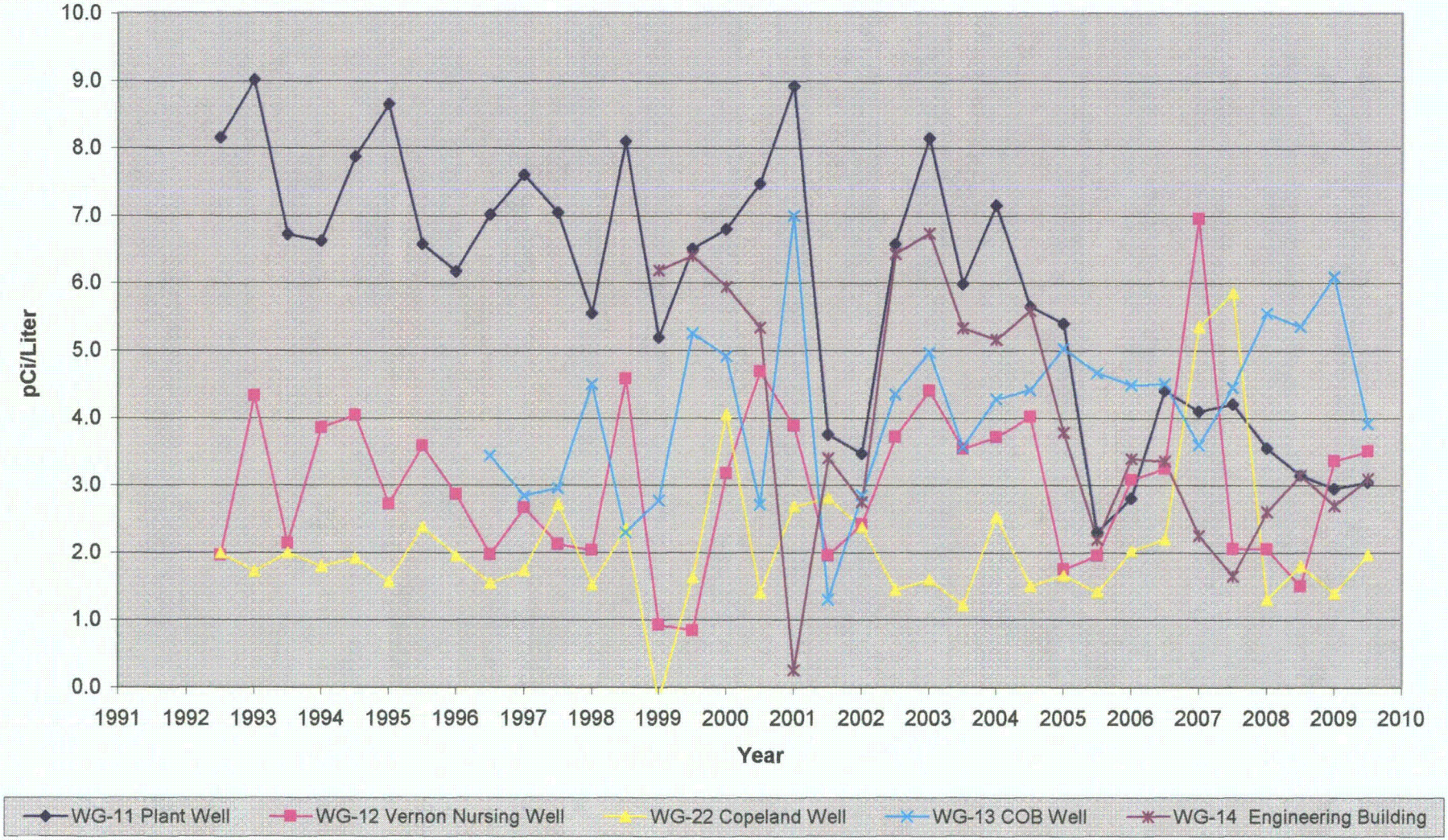
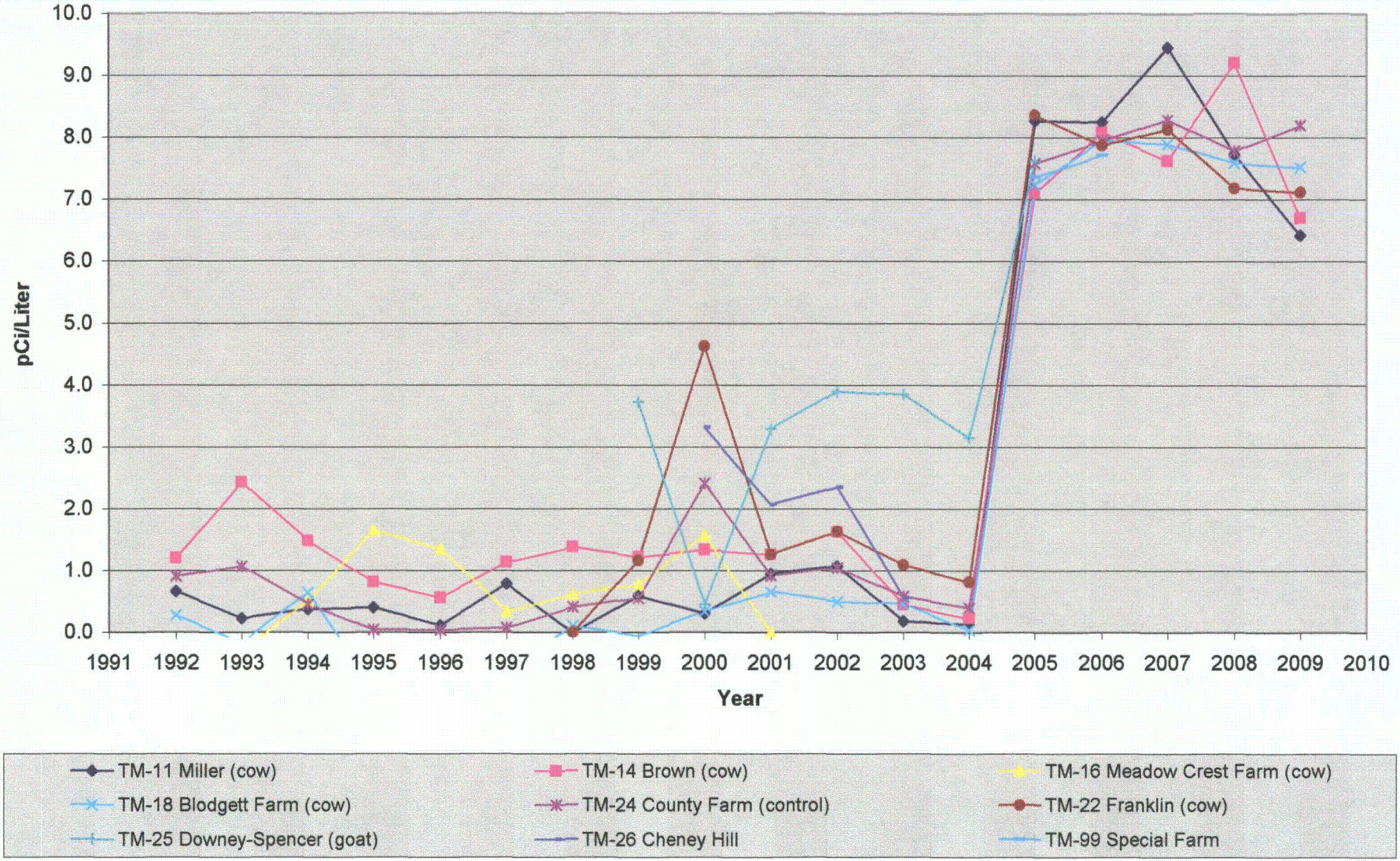


Figure 6.10 - Cesium 137 in Milk - Annual Average Concentration



Note: In 2005, changed analytical laboratory. New lab has higher Cs-137 Minimum Detectable Concentration

Figure 6.11 - Strontium 90 in Milk - Annual Averge Concentrations

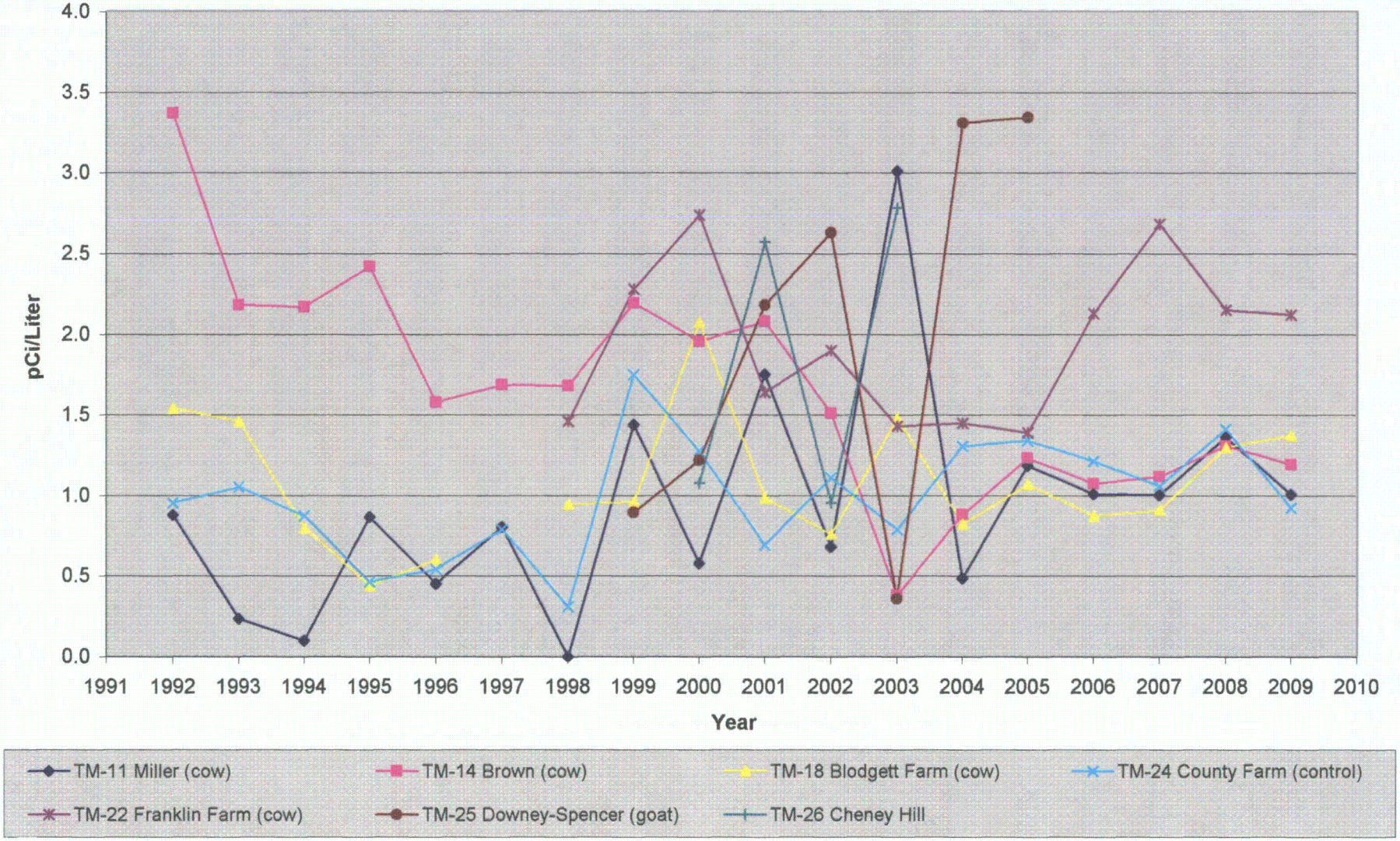
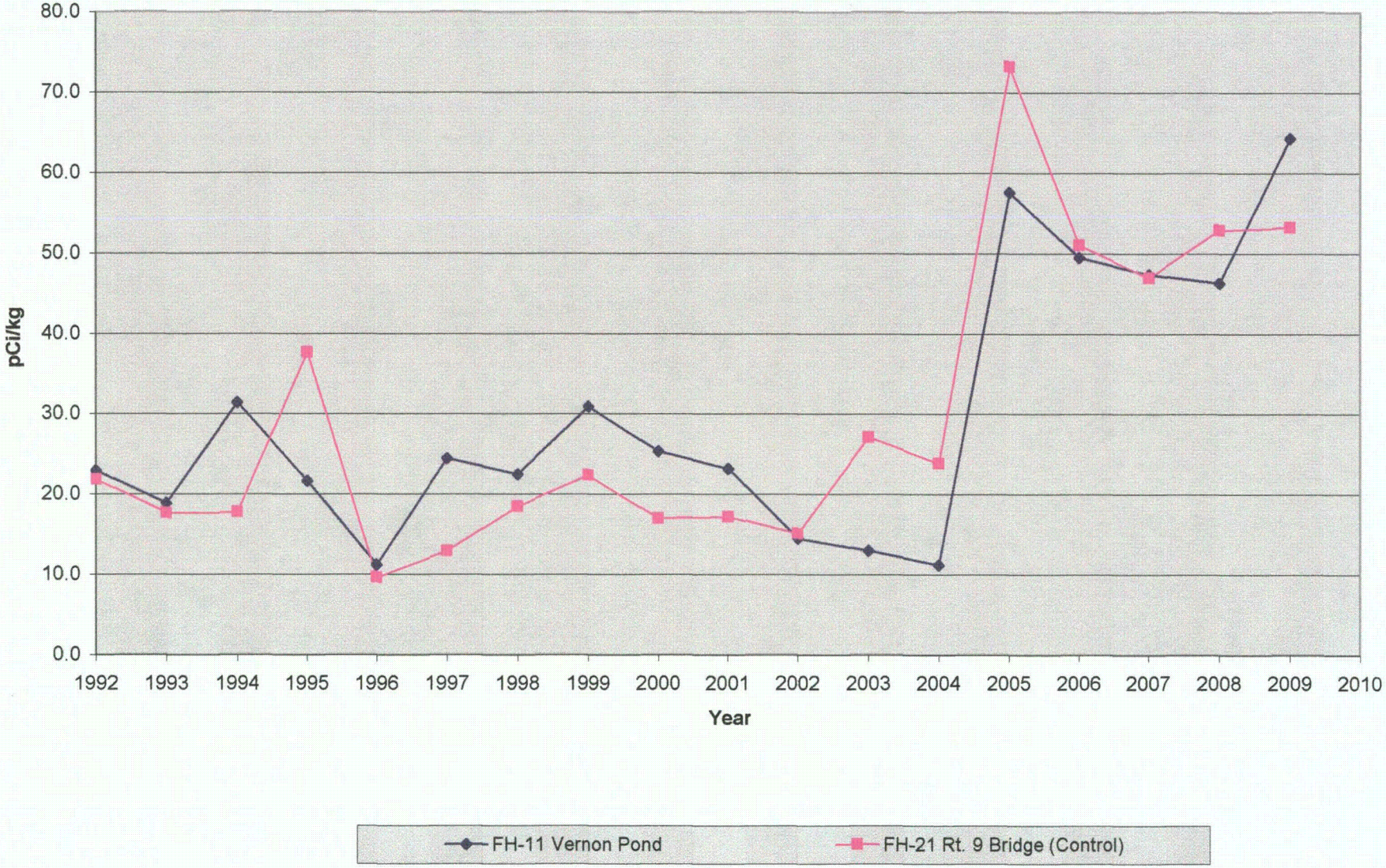


Figure 6.12 - Cesium 137 in Fish - Annual Average Concentrations



Note: In 2005, changed analytical laboratory. New laboratory has higher Cs-137 Minimum Detectable Concentration

Figure 6.13 - Average Exposure Rate at Inner Ring, Outer Ring and Control TLDs

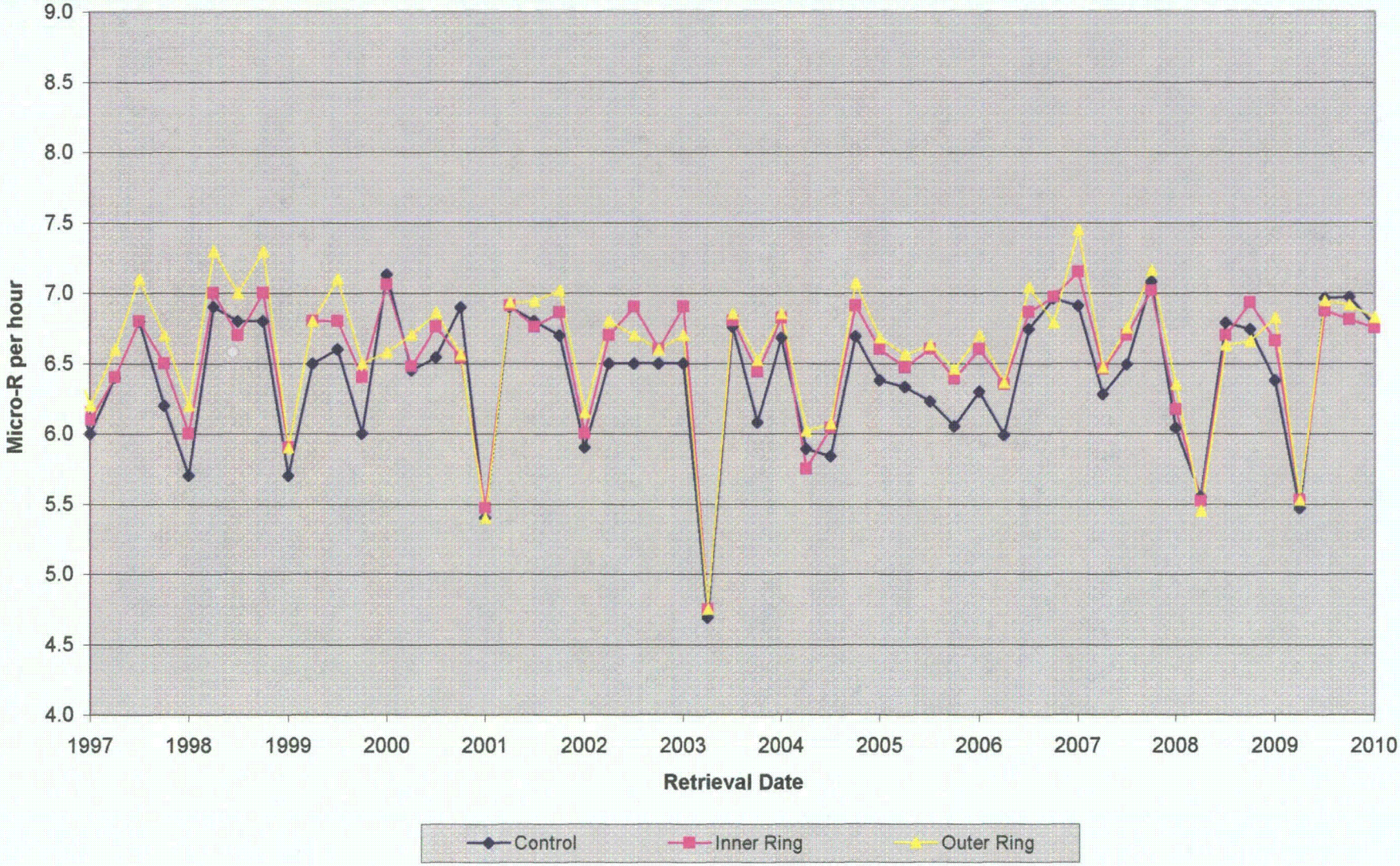


Figure 6.14 - Exposure Rate at Indicator TLDs, DR01-03

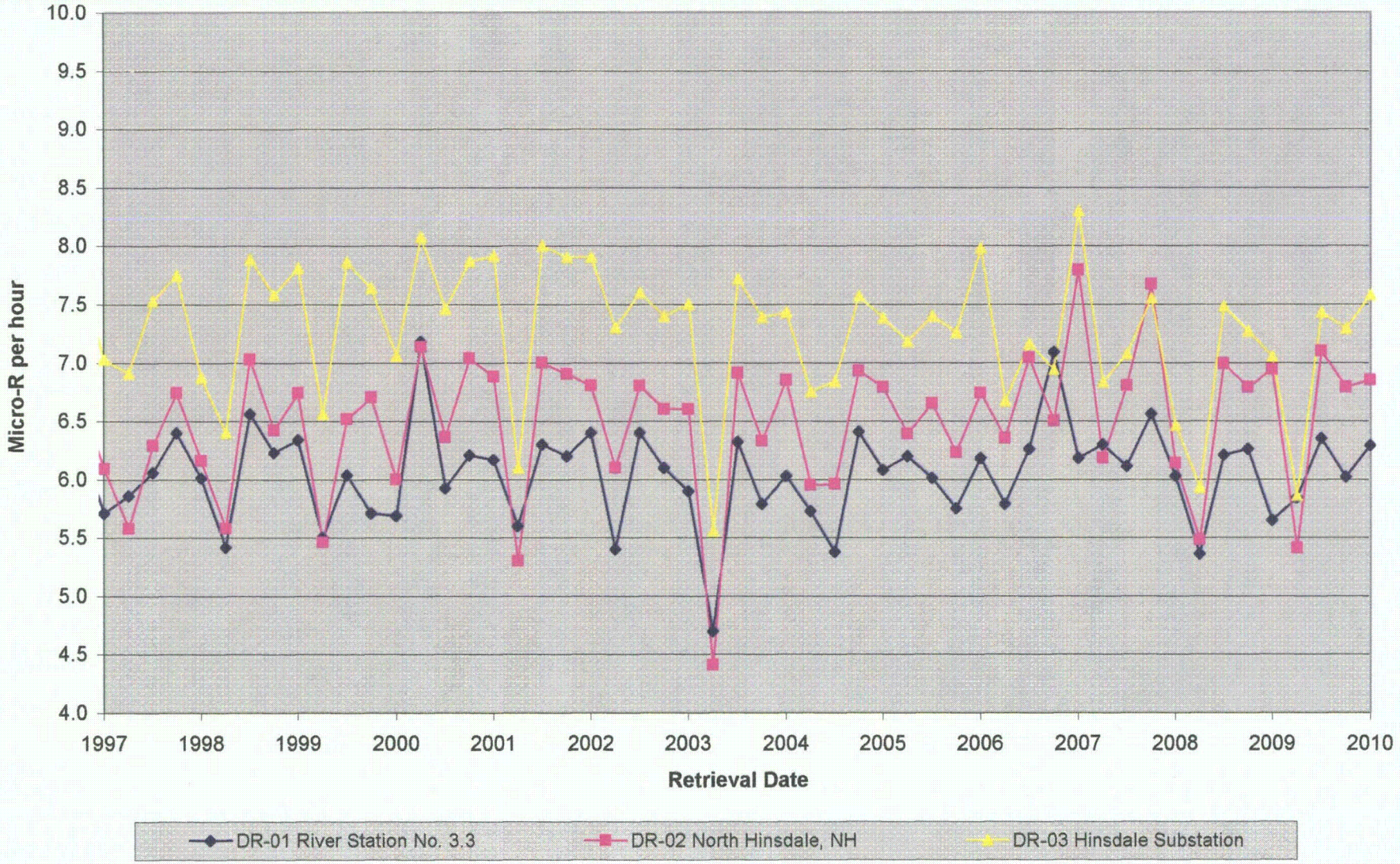


Figure 6.15 - Exposure Rate at Indicator TLDs, DR06 & DR-50

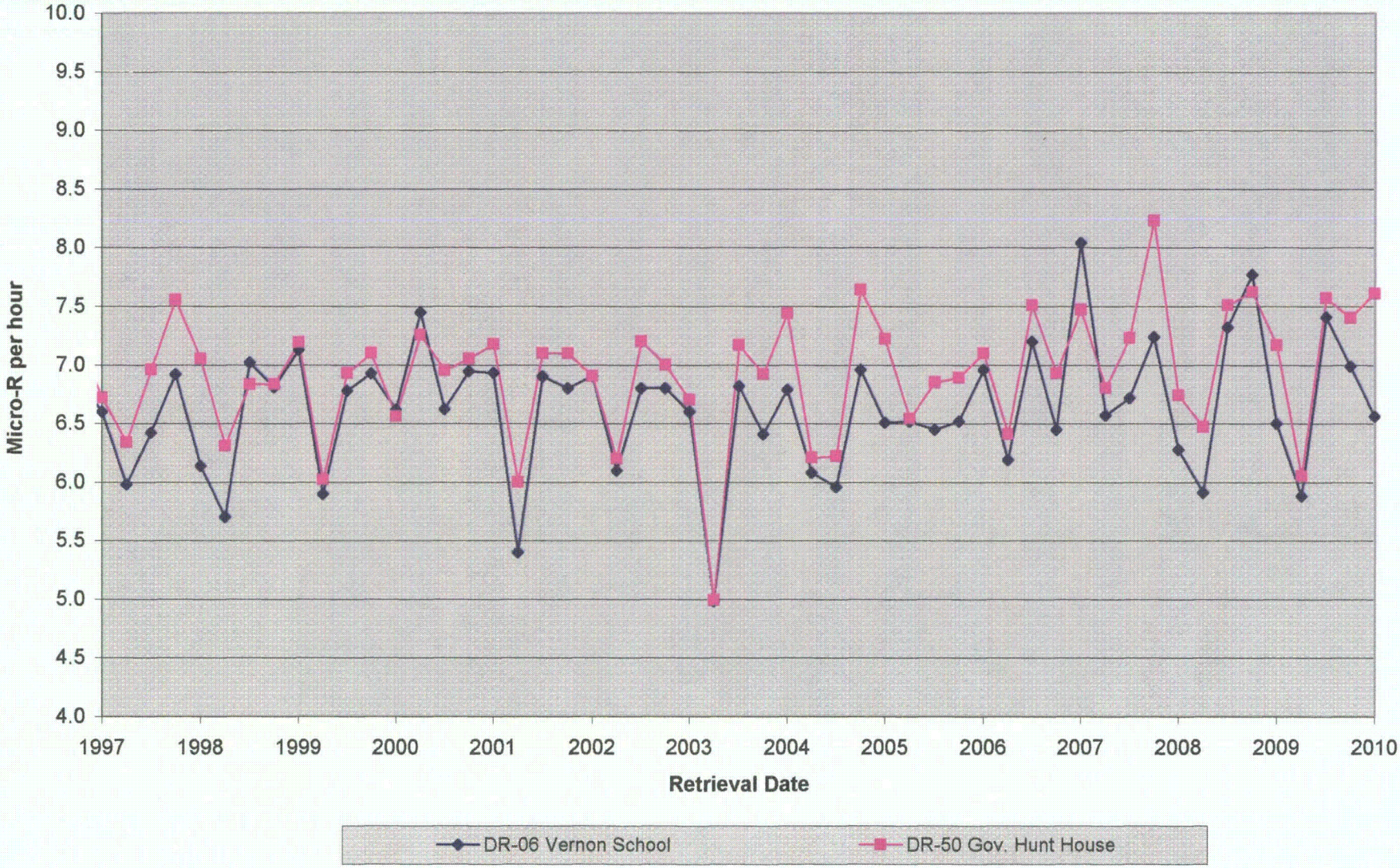


Figure 6.16 - Exposure Rate at Site Boundary TLDs DR07, 08, 41 & 42

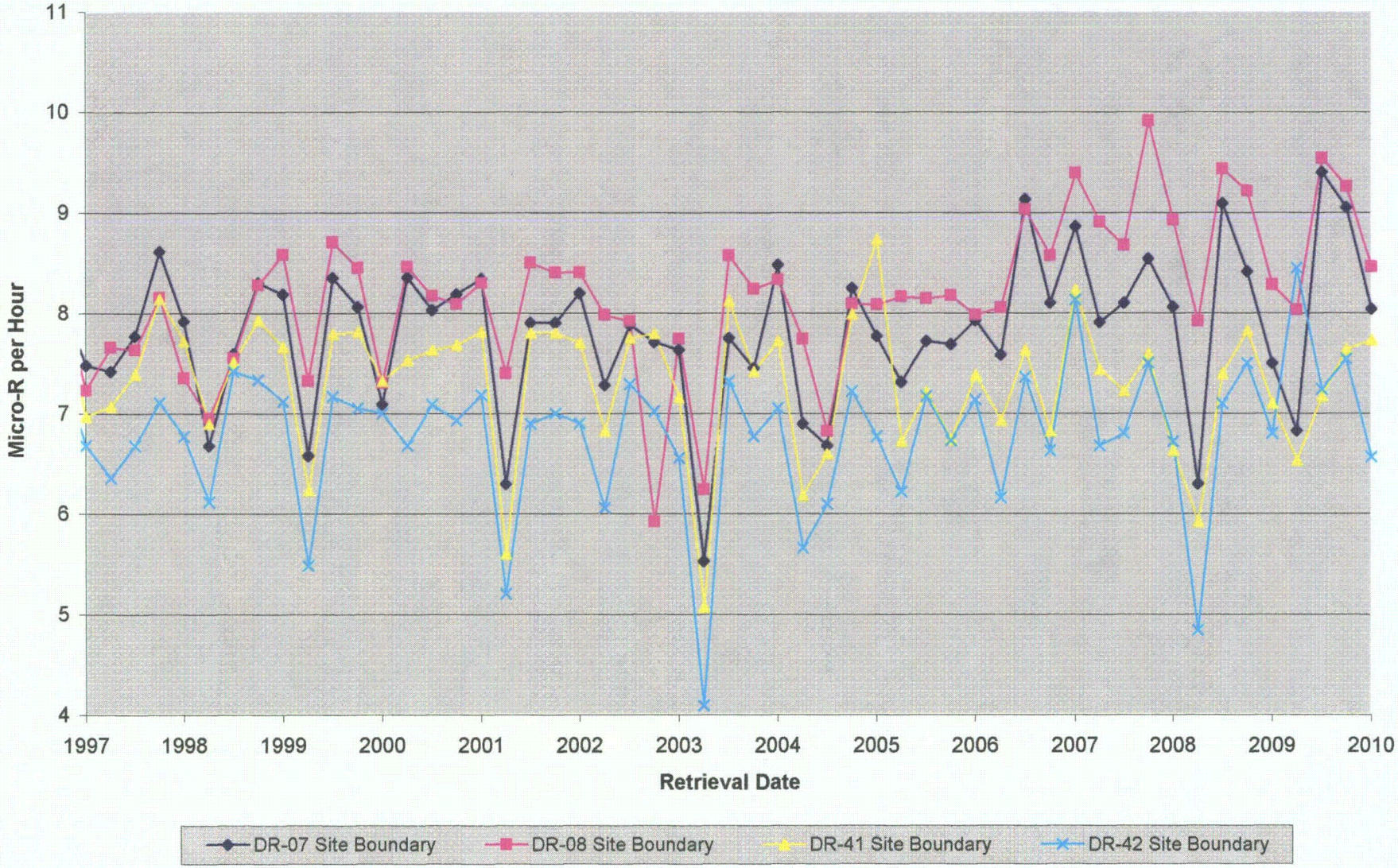


Figure 6.17 - Exposure Rate at Site Boundary TLDs - DR43 thru 46

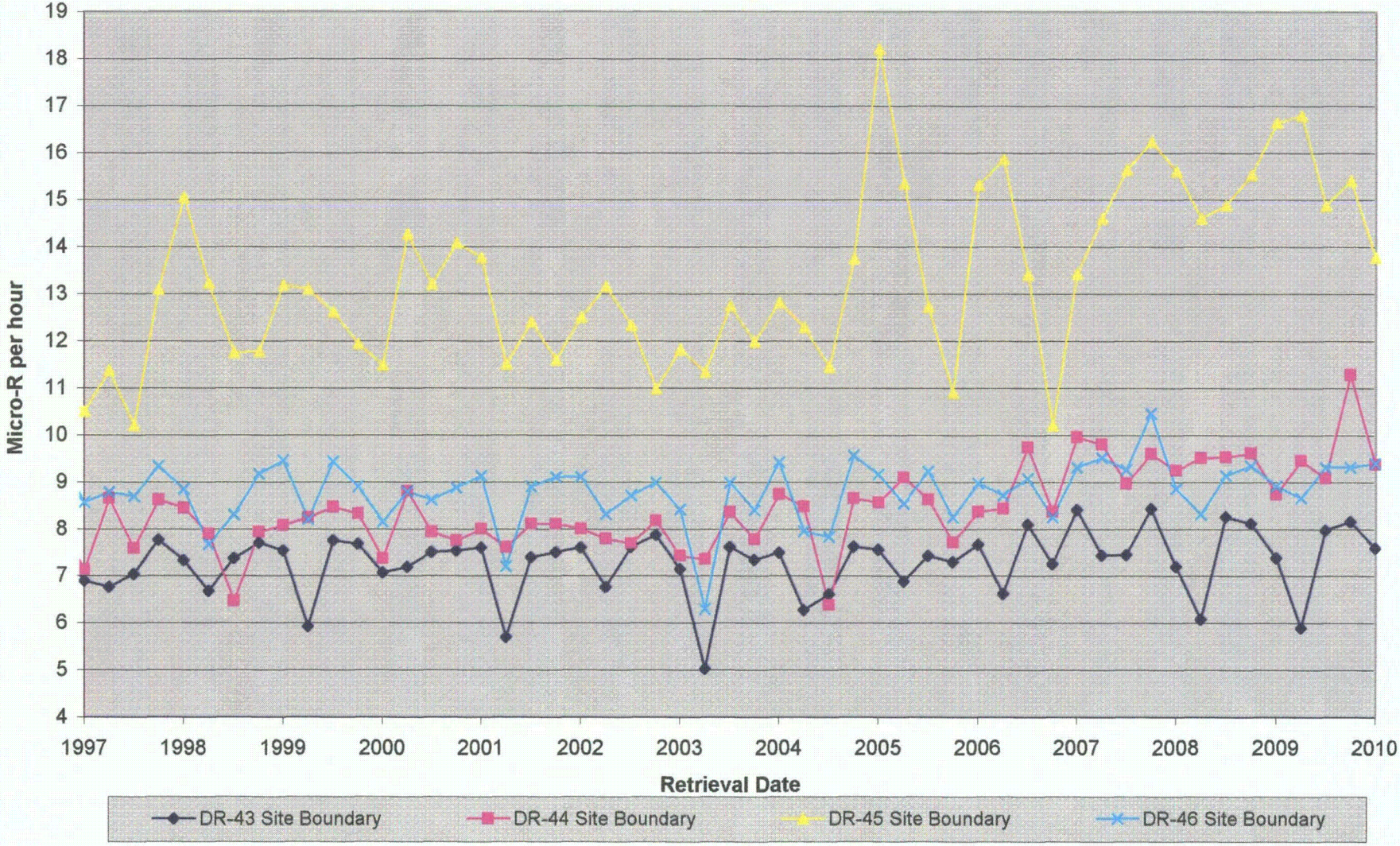


Figure 6.18 - Exposure Rate at Site Boundary TLDs DR47-49 & 51-53

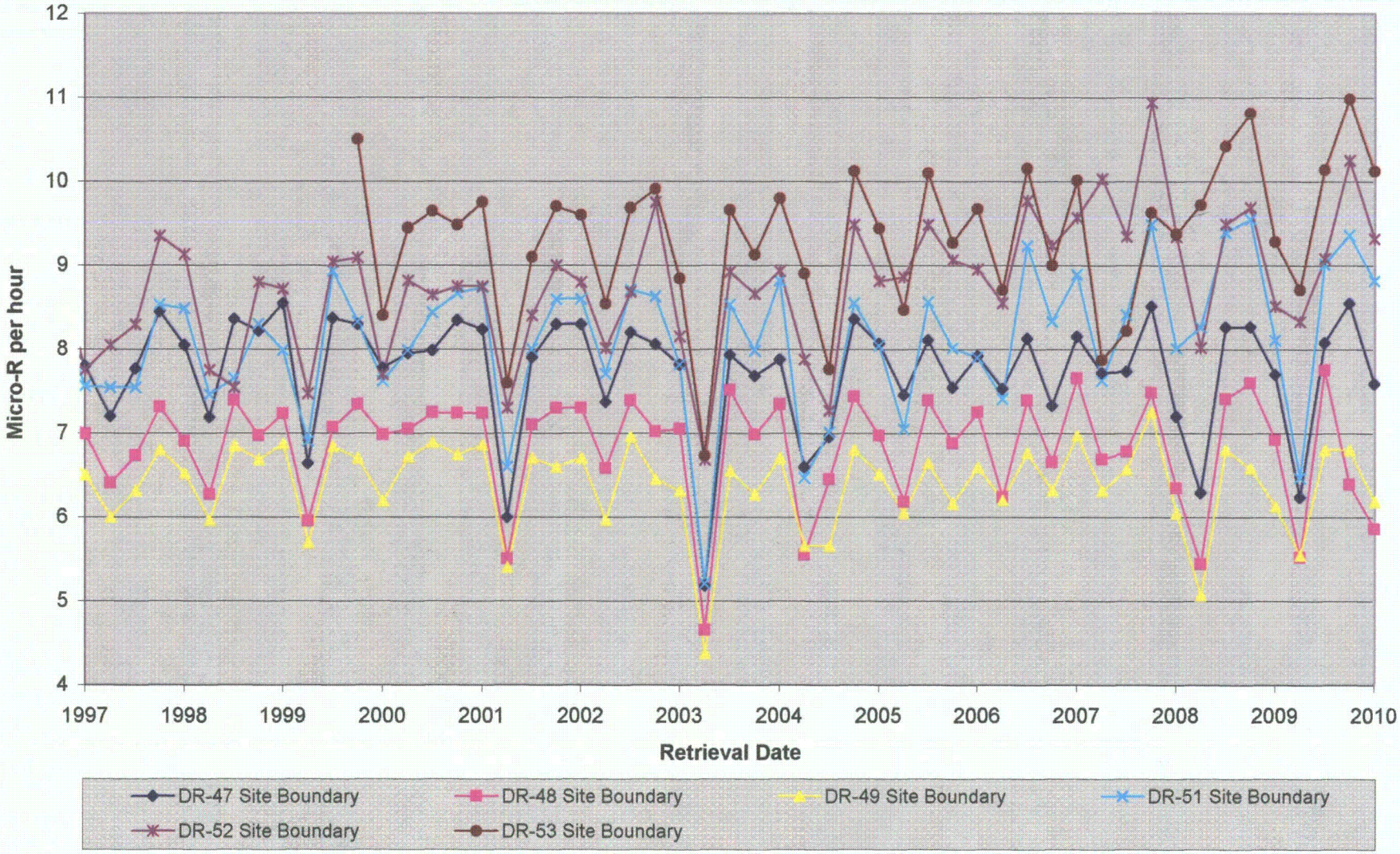


Figure 6.19 - Exposure Rate at Inner Ring TLDs DR09, 11, 13 & 15

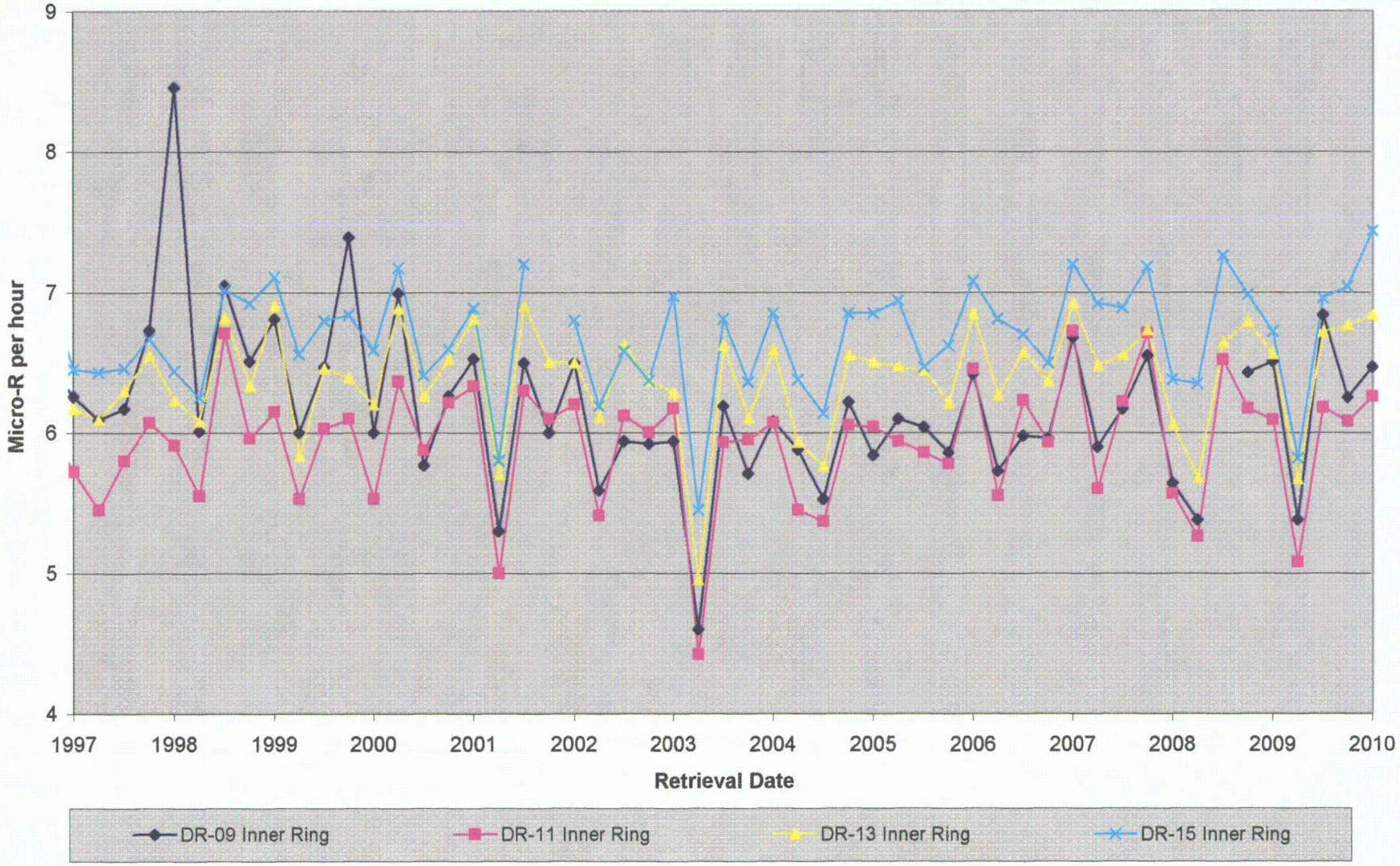


Figure 6.20 - Exposure Rate at Inner Ring TLDs DR17, 19, 21 & 23

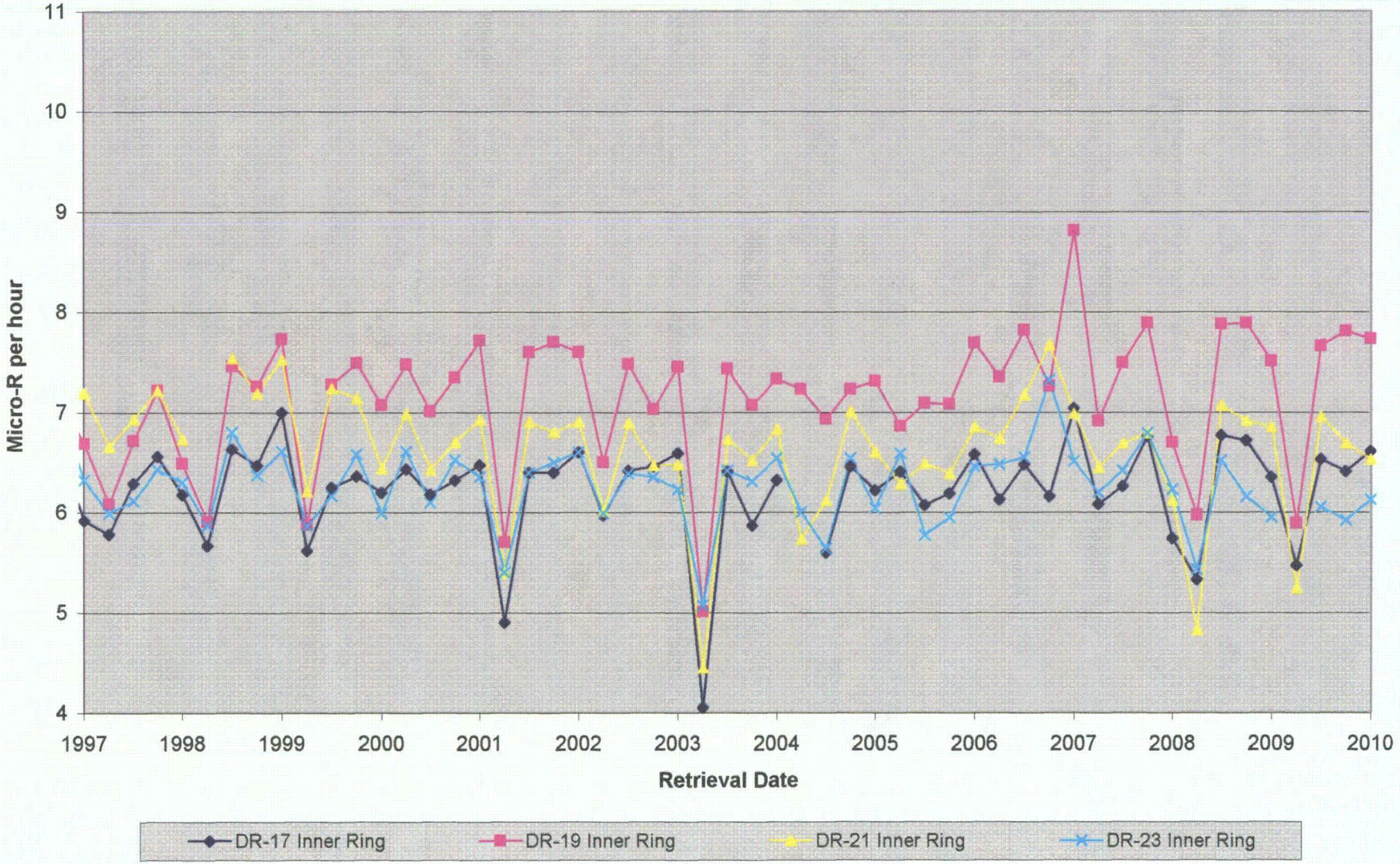


Figure 6.21 - Exposure Rate at Inner Ring TLDs DR25, 27, 29 & 31

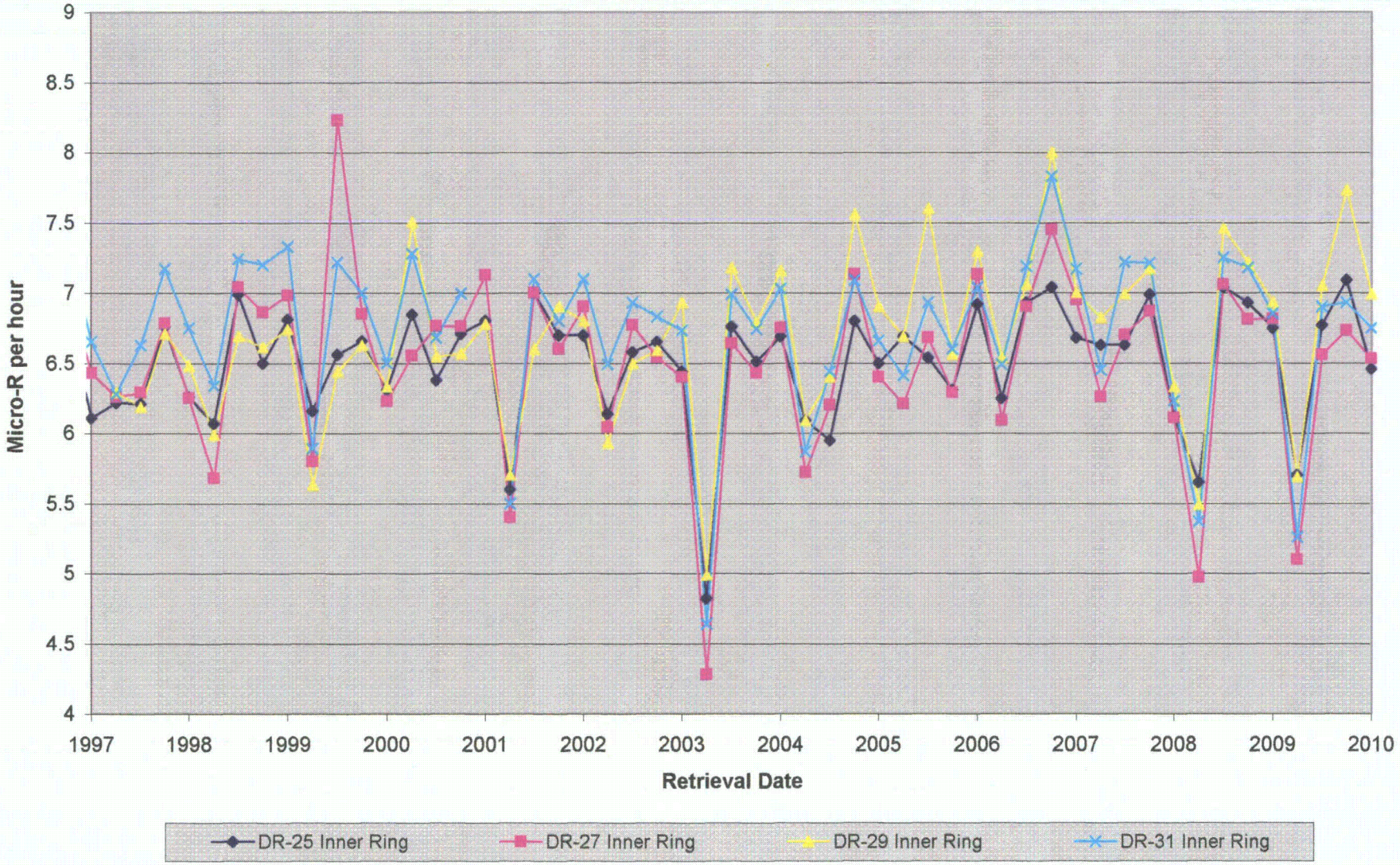


Figure 6.22 - Exposure Rate at Inner Ring TLDs DR33, 35, 37 & 39

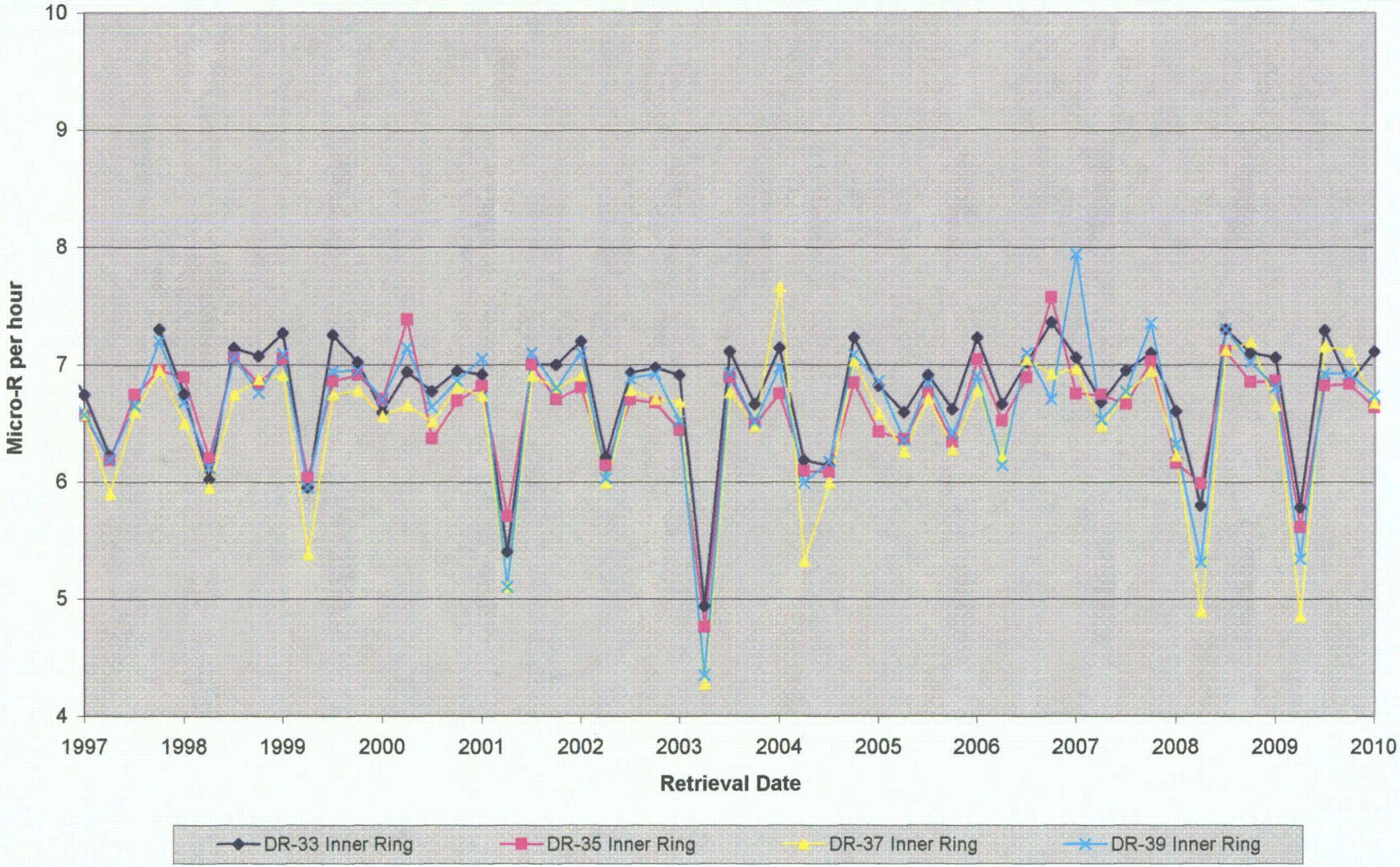


Figure 6.23 - Exposure Rate at Outer Ring TLDs DR10, 12, 14 & 16

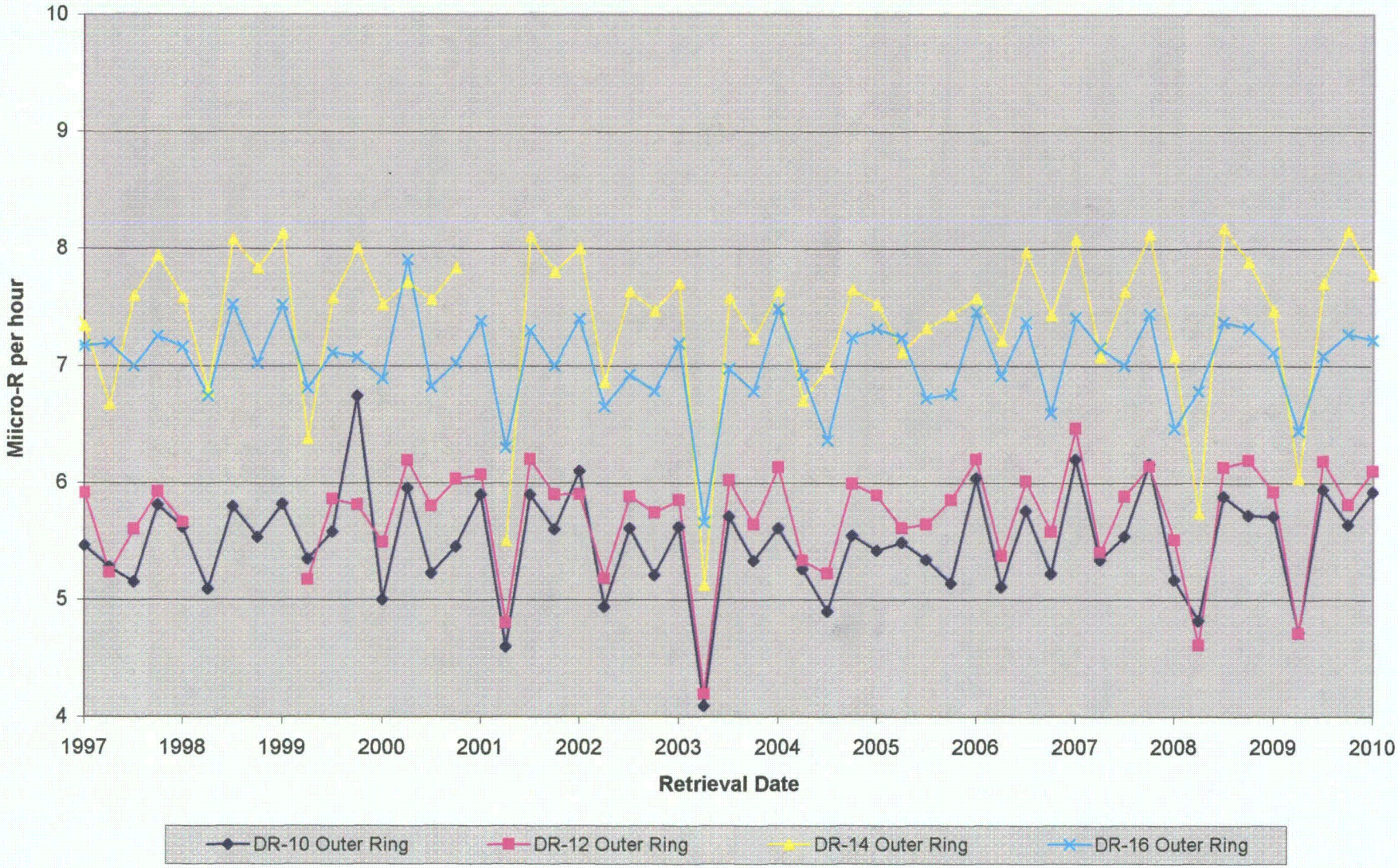


Figure 6.24 - Exposure Rate at Outer Ring TLDs DR18, 20, 22 & 24

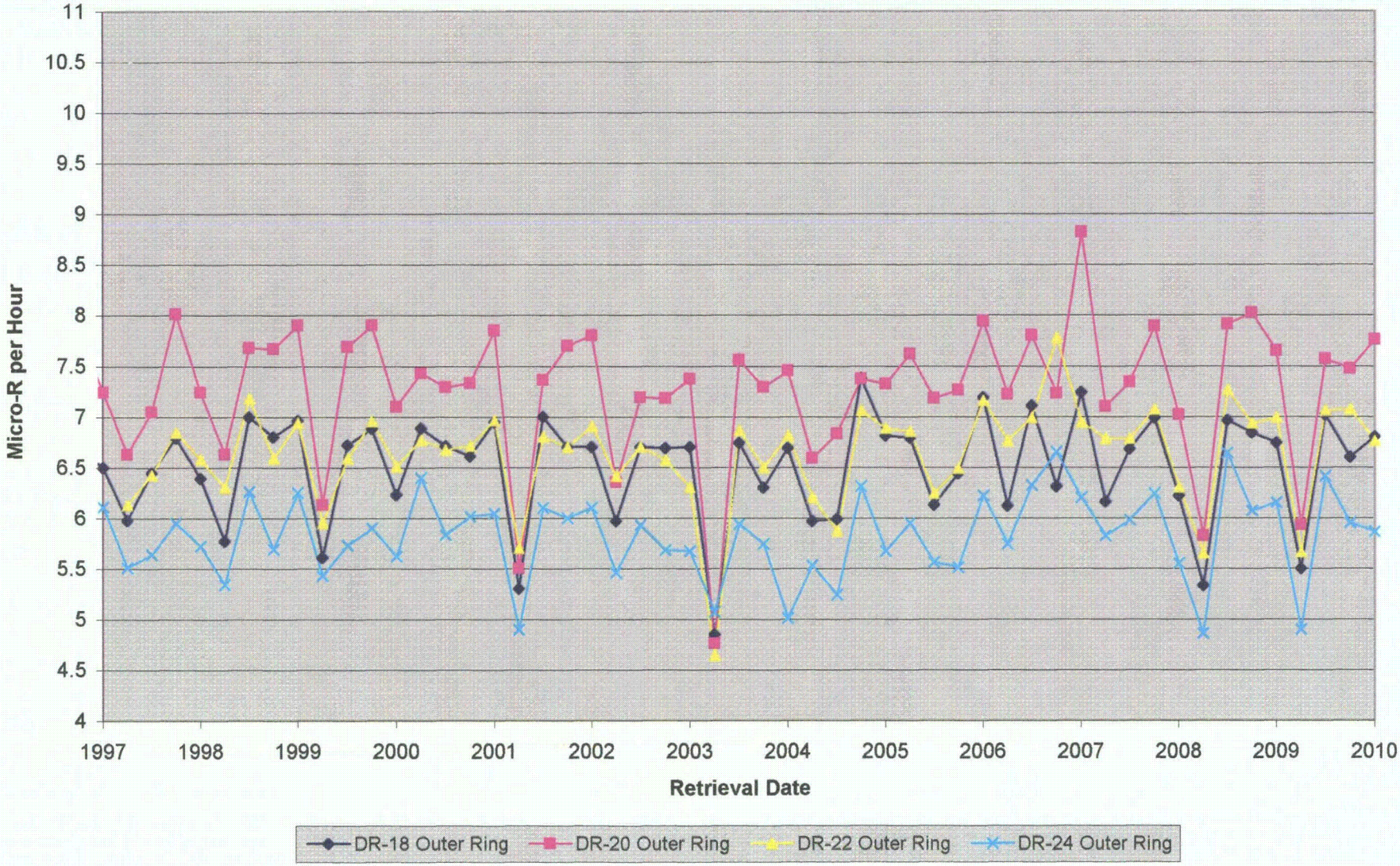


Figure 6.25 - Exposure Rate at Outer Ring TLDs DR26, 28, 30 & 32

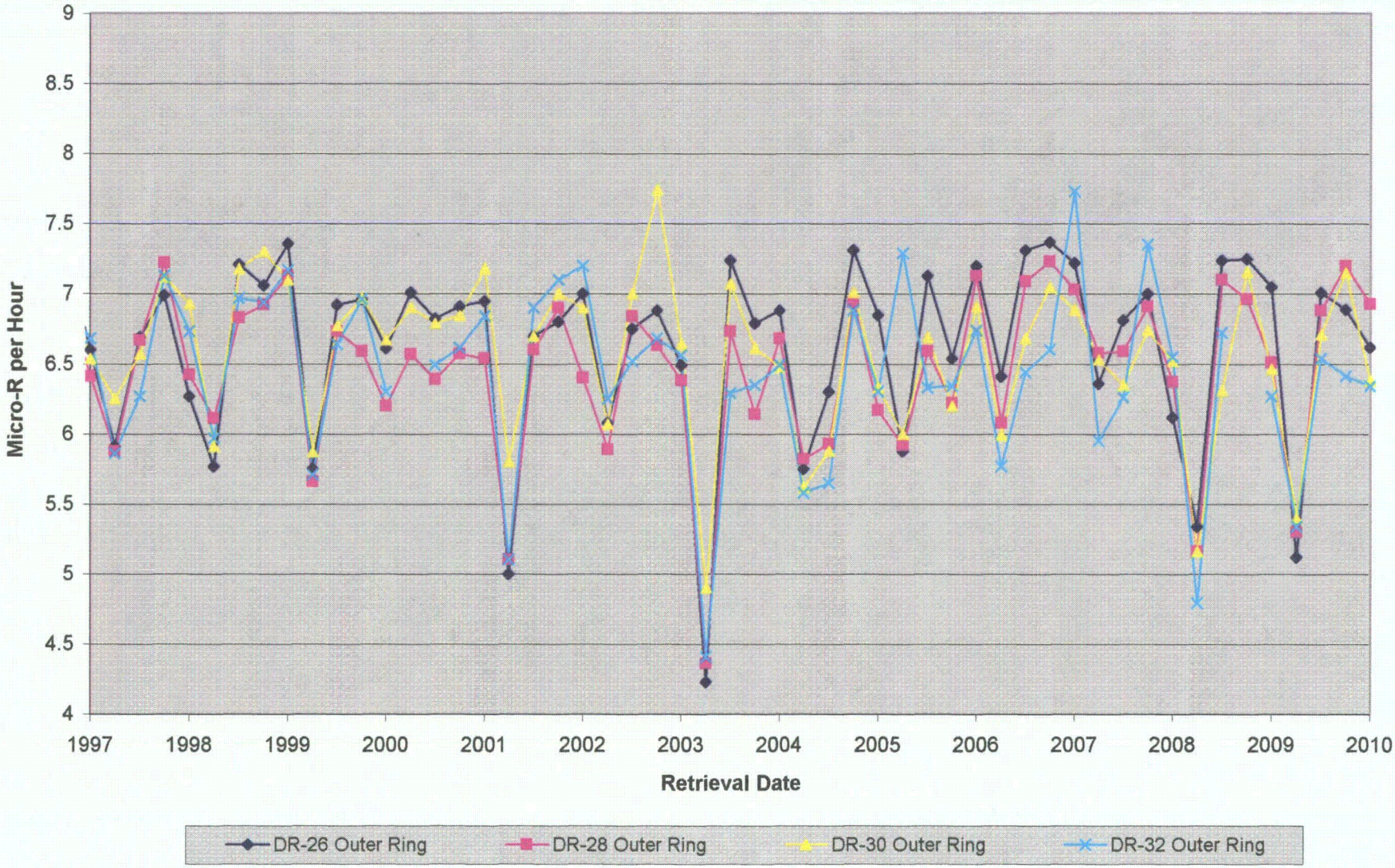
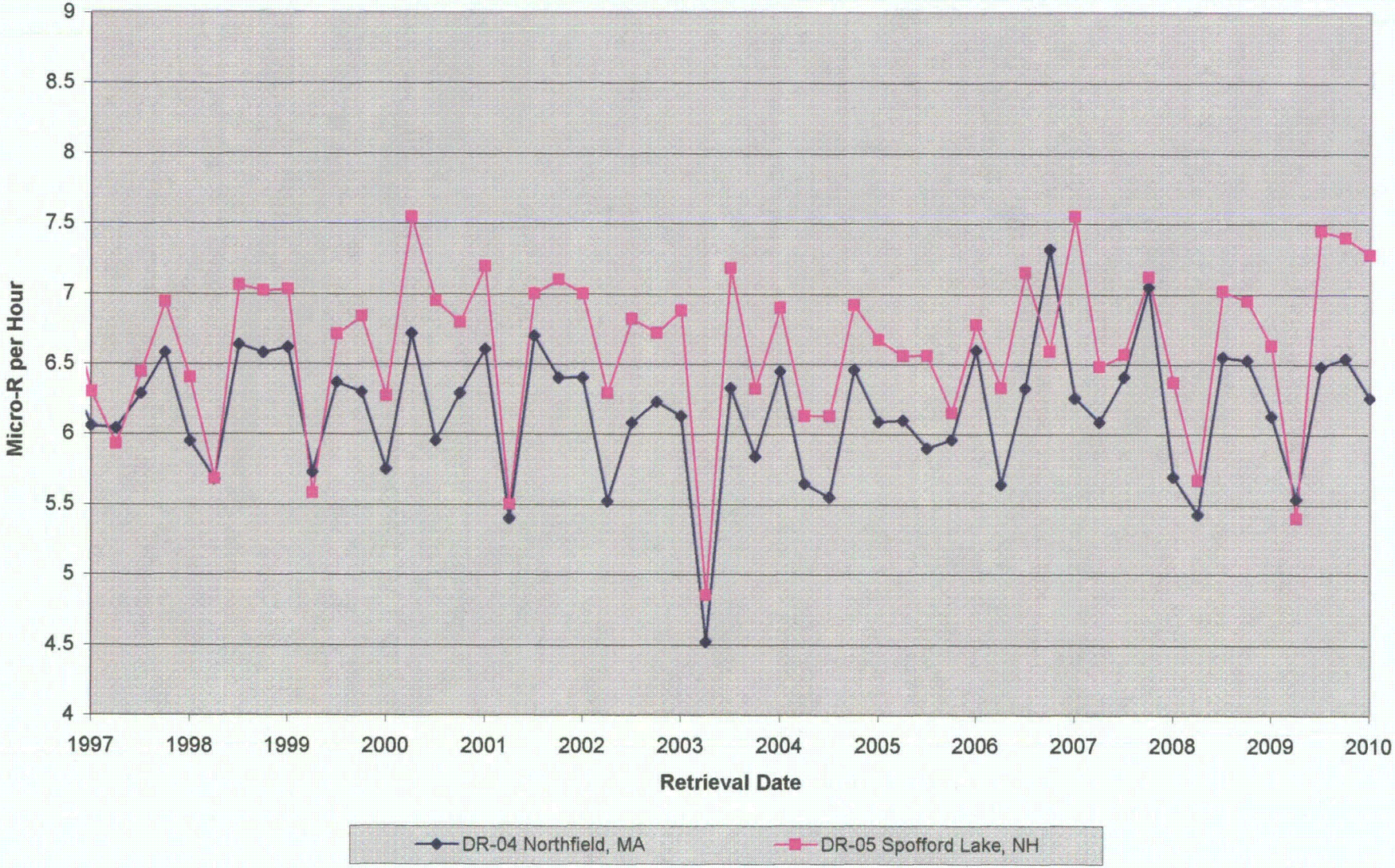


Figure 6.26 - Exposure Rate at Outer Ring TLDs DR 34, 36, 38 & 40

Figure 6.27 - Exposure Rate at Control TLDs DR04 & 05



7 QUALITY ASSURANCE PROGRAMS

7.1 AREVA NP Environmental Laboratory

7.1.1 The quality assurance program at the AREVA NP Environmental Laboratory (E-LAB) is designed to serve two overall purposes: 1) Establish a measure of confidence in the measurement process to assure the licensee, regulatory agencies and the public that analytical results are accurate and precise; and 2) Identify deficiencies in the sampling and/or measurement process to those responsible for these operations so that corrective action can be taken. Quality assurance is applied to all steps of the measurement process, including the collection, measurement and reporting of data, as well as the record keeping of the final results. Quality control, as part of the quality assurance program, provides a means to control and measure the characteristics of the measurement equipment and processes, relative to established requirements. The E-LAB employs a comprehensive quality assurance program designed to monitor the quality of analytical processing to ensure reliable environmental monitoring data. The program includes the use of controlled procedures for all work activities, a nonconformance and corrective action tracking system, systematic internal audits, audits by external groups, a laboratory quality control program, and staff training by the Laboratory QA Officer and a third party cross check program administered by Analytics, Inc. Together these programs are targeted to supply QC/QA sources at 5% of the client sample analysis load. In addition a blind duplicate program is conducted through client environmental monitoring programs.

7.1.2 Environmental TLD Quality Assurance Program

Performance documentation of the routine processing of the Panasonic environmental TLDs (thermoluminescent dosimeter) program at the E-LAB is provided by the dosimetry quality assurance testing program. This program includes independent third party performance testing by Battelle Pacific Northwest Labs (typically semi-annually) and internal performance testing conducted by the Laboratory QA Officer. Under these programs, sets of six dosimeters are irradiated to ANSI specified testing criteria and submitted for processing as "unknowns." The bias and precision of TLD processing is measured against this standard and is used to indicate trends and changes in performance. Instrumentation checks, although routinely performed and representing between 5-10% of the TLDs processed, are not presented in this report.

Eighty four performance tests were conducted in 2009 by the E-LAB (In-house and Third party). These tests were made on fourteen separate sets of six dosimeters. All of the fourteen TLD test sets passed the mean bias criteria of ±20.1%. Of the one hundred and two individual measurements, 100% of the dosimeter evaluations met the E-LAB Internal Acceptance Criteria for bias (±20.1%) and precision (±12.8%). Third Party QC results are summarized below.

Percentage of Individual Analyses that passed E-LAB Internal Criteria

Dosimeter Type	Number Tested	% Passed Bias Criteria	% Passed Precision Criteria
Panasonic Environmental	84	100	100

Summary of Third Party Testing

Dosimeter Type	Exposure Period	ANSI Category	% (Bias ± SD)
Panasonic Environmental	First Half 2009	II, high energy	2.7 +/- 1.0
Panasonic Environmental	Second Half 2009	II, high energy	-1.1 +/- 1.4

* American National Standards Institute (ANSI) Performance Statistic as referenced in the Dosimetry Services Semi-Annual QA Status Report.

Note: Results are expressed as the delivered exposure for environmental TLD. ANSI HPS N13.29-1995 (Draft) Category II, High energy photons (Cs-137 or Co-60).

7.2 Teledyne Brown Engineering-Environmental Services (TBE-ES) Laboratory

7.2.1 Operational Quality Control Scope

7.2.1.1 Inter-laboratory

The TBE-ES Laboratory QC Program is designed to monitor the quality of analytical processing associated with environmental, effluent (10CFR Part 50), and waste characterization (10CFR Part 61) samples.

Quality Control of environmental radioanalyses involves the internal process control program and independent third party programs administered by Analytics, Inc and Environmental Resource Associates (ERA).

TBE-ES participates in the Quality Assessment Program (QAP) administered by the Department of Energy (DOE) Mixed Analyte Performance Evaluation Program (MAPEP). The MAPEP is a set of performance evaluation samples (e.g. water, soil, air filters, etc.) designed to evaluate the ability and quality of analytical facilities performing sample measurements which contain hazardous and radioactive (mixed) analytes.

Quality Control for radioanalyses during this reporting period was divided among internal process check samples, third party process checks prepared by Analytics, Inc. (which was submitted by users or secured directly by TBE-ES for QC purposes), ERA, and DOE's MAPEP.

7.2.1.2 Intra-laboratory

The internal Quality Control program is designed to include QC functions such as instrumentation checks (to ensure proper instrument response), blank samples (to which no analyte radioactivity has been added), instrumentation backgrounds, duplicates, as well as overall staff qualification analyses and process controls. Both process control and qualification analyses samples seek to mimic the media type of those samples submitted for analyses by the various laboratory clients. These process controls (or process checks) are either actual samples submitted in duplicate in order to evaluate the accuracy of laboratory measurements, or blank samples which have been "spiked" with a known quantity of a radioisotope that is of interest to laboratory clients. These QC samples, which represent either "single" or "double-blind" unknowns, are intended to evaluate the entire radiochemical and radiometric process.

To provide direction and consistency in administering the quality assurance program, TBE-ES has developed and follows an annual quality control and audit assessment schedule. The plan describes the scheduled frequency and scope of Quality Assurance and Control considered necessary for an adequate QA/QC program conducted throughout the year. The magnitude of the process control

program combines both internal and external sources targeted at 5% of the routine sample analysis load.

7.2.1.3 QA Program (Internal and External Audits)

During each reporting period at least one internal assessment is conducted in accordance with the pre-established TBE-ES Quality Control and Audit Assessment Schedule. In addition, the laboratory may be audited by prospective customers during a pre-contract audit, and/or by existing clients who wish to conduct periodic audits in accordance with their contractual arrangements. The Nuclear Utilities Procurement Issues Committee (NUPIC) conducts audits of TBE-ES as a function of a Utilities Radiological Environment Measurement Program (REMP).

TBE-ES Laboratory-Knoxville has successfully completed the New York State Department of Health's Environmental Laboratory Approval Program (NELAP), Nuclear Fuel Services, Manufacturing Sciences Corporation and State of Tennessee audits. These audits were each a comprehensive review of TBE-ES's Quality and Technical programs used to assess the laboratory's ability to produce accurate and defensible data. No significant deficiencies, which would adversely impact data quality, were identified during any of these audits. Administrative findings identified during these inspections are usually addressed promptly, according to client specifications.

7.2.2 Analytical Services Quality Control Synopsis

7.2.2.1 Results Summary

7.2.2.1.1 Environmental Services Quality Control

During this annual reporting period, twenty-eight nuclides associated with six media types were analyzed by means of the laboratory's internal process control, Analytics, ERA and DOE quality control programs. Media types representative of client company analyses performed during this reporting period were selected. The results for these programs are presented in Tables 7.2. Below is a synopsis of the media types evaluated:

- Air Filter
- Charcoal (Air Iodine)
- Milk
- Soil
- Vegetation
- Water

7.2.2.1.2 Analytics Environmental Cross-Check Program

Twelve nuclides were evaluated during this reporting period. All environmental analyses performed were within the acceptable criteria.

7.2.2.1.3 Summary of Participation in the Department of Energy (DOE) Monitoring Program

TBE-ES participated in the semi annual Mixed Analyte Performance Evaluation Program (MAPEP) for liquid, air particulate, soil, and vegetation analyses (MAPEP-Series 17). During this reporting period, 18 nuclides were evaluated. All but one of the 18 environmental analyses performed were within the acceptable criteria. In one AP sample, Zn-65 failed due to a slightly high bias on Detector 7. A recount on Detector 17 resulted in a Zn-65 result of 101 pCi/L. The detector has been tagged out-of-service until a recalibration can be performed. Detector 7 is not used for client samples. No client samples were affected during this period.

7.2.2.1.5 Summary of participation in the ERA Program

During this reporting period, 11 nuclides were analyzed under ERA criteria. All of the environmental analytical results were acceptable.

7.2.2.2 Intra-Laboratory Process Control Program

The TBE-ES Laboratory's internal process control program evaluated 4269 individual samples.

7.2.2.2.1 Spikes

All but eight of the 1442 environmental spikes were analyzed with statistically appropriate activity reported for each spike. The one affected work order was reanalyzed.

7.2.2.2.2 Analytical Blanks

During this reporting period, all but two of the 1442 environmental analytical blanks analyzed reported less than MDC. The activity detected for the two blanks is indistinguishable from natural background.

7.2.2.2.3 Duplicates

All of 1385 duplicate sets analyzed were within acceptable limits.

7.2.2.2.4 Non-Conformance Reports

There were 24 non-conformance reports issued for this reporting period. No ENNVY data was impacted by the non-conformance in each of these cases.

7.3 J. A. Fitzpatrick Environmental Laboratory QA/QC Program

7.3.1 PROGRAM DESCRIPTION

The Offsite Dose Calculation Manual (ODCM), Part 1, Section 5.3 requires that the licensee participate in an Interlaboratory Comparison Program. The Interlaboratory Comparison Program shall include sample media for which samples are routinely collected and for which comparison samples are commercially available. Participation in an Interlaboratory Comparison Program ensures that independent checks on the precision and accuracy of the measurement of radioactive material in the environmental samples are performed as part of the Quality Assurance Program for environmental monitoring. To fulfill the requirement for an Interlaboratory Comparison Program, the JAF Environmental Laboratory has engaged the services of Eckert & Ziegler Analytics, Incorporated in Atlanta, Georgia.

Analytics supplies sample media as blind sample spikes, which contain certified levels of radioactivity unknown to the analysis laboratory. These samples are prepared and analyzed by the JAF Environmental Laboratory using standard laboratory procedures. Analytics issues a statistical summary report of the results. The JAF Environmental Laboratory uses predetermined acceptance criteria methodology for evaluating the laboratory's performance.

The JAF Environmental Laboratory also analyzes laboratory blanks. The analysis of laboratory blanks provides a means to detect and measure radioactive contamination of analytical samples. The analysis of analytical blanks also provides information on the adequacy of background subtraction. Laboratory blank results are analyzed using control charts.

7.3.2 PROGRAM SCHEDULE

SAMPLE MEDIA	LABORATORY ANALYSIS	SAMPLE PROVIDER ECKERT & ZIEGLER ANALYTICS
Water	Gross Beta	3
Water	Tritium	5
Water	I-131	4
Water	Mixed Gamma	4
Air	Gross Beta	3
Air	I-131	4
Air	Mixed Gamma	2
Milk	I-131	3
Milk	Mixed Gamma	3
Soil	Mixed Gamma	1
Vegetation	Mixed Gamma	2
TOTAL SAMPLE INVENTORY		**34**

7.3.3 ACCEPTANCE CRITERIA

Each sample result is evaluated to determine the accuracy and precision of the laboratory's analysis result. The sample evaluation method is discussed below.

7.3.3.1 SAMPLE RESULTS EVALUATION

Samples provided by Analytics are evaluated using what is specified as the NRC method. This method is based on the calculation of the ratio of results reported by the participating laboratory (QC result) to the Vendor Laboratory Known value (reference result).

An Environmental Laboratory analytical result is evaluated using the following calculation:

The value for the error resolution is calculated.

$$\text{The error resolution} = \frac{\text{Reference Result}}{\text{Reference Results Error (1 sigma)}}$$

Using the appropriate row under the Error Resolution column in Table 7.3.1 below, a corresponding Ratio of Agreement interval is given.

The value for the ratio is then calculated.

$$\text{Ratio of Agreement} = \frac{\text{QC Result}}{\text{Reference Result}}$$

If the value falls within the agreement interval, the result is acceptable.

TABLE 7.3.1

ERROR RESOLUTION	RATIO OF AGREEMENT
< 4	No Comparison
4 to 7	0.5 to 2.0
8 to 15	0.6 to 1.66
16 to 50	0.75 to 1.33
51 to 200	0.8 to 1.25
>200	0.85 to 1.18

This acceptance test is generally referred to as the "NRC" method. The acceptance criteria is contained in Procedure EN-CY-102. The NRC method generally results in an acceptance range of approximately ± 25% of the Known value when applied to sample results from the Eckert & Ziegler Analytics Interlaboratory Comparison Program. This method is used as the procedurally required assessment method and requires the generation of a deviation from QA/QC program report when results are unacceptable.

7.3.4 PROGRAM RESULTS SUMMARY

The Interlaboratory Comparison Program numerical results are provided on Table 8-1.

7.3.4.1 ECKERT & ZIEGLER ANALYTICS QA SAMPLES RESULTS

Thirty-four QA blind spike samples were analyzed as part of Analytics 2009 Interlaboratory Comparison Program. The following sample media were evaluated as part of the comparison program.

- Air Charcoal Cartridge: I-131
- Air Particulate Filter: Mixed Gamma Emitters, Gross Beta
- Water: I-131, Mixed Gamma Emitters, Tritium, Gross Beta
- Soil: Mixed Gamma Emitters
- Milk: I-131, Mixed Gamma Emitters
- Vegetation: Mixed Gamma Emitters

The JAF Environmental Laboratory performed 130 individual analyses on the 34 QA samples. Of the 130 analyses performed, 129 were in agreement using the NRC acceptance criteria for a 99.2% agreement ratio.

There was one nonconformity in the 2009 program.

7.3.4.2 ECKERT & ZIEGLER ANALYTICS SAMPLE NONCONFORMITY

Eckert & Ziegler Analytics Sample 6570-05, Fe-59 on Air Filter
Nonconformity No. 2009-02
Corrective Action No. CR-JAF-2009-01758

A spiked mixed gamma on an air particulate filter sample supplied by Eckert & Ziegler Analytics, Inc., was analyzed in accordance with standard laboratory procedures. The sample contained a total of nine radionuclides for analysis. Nine of the nine radionuclides present were quantified. Eight of the nine radionuclides were quantified within the acceptable range. The mean result for Fe-59 was determined to be outside the QA Acceptance Criteria resulting in sample nonconformity and subsequent corrective action. The filter was analyzed three times using three different detectors. An average Fe-59 value of 153 pCi was reported. The known result for the sample was 121 pCi as determined by the supplier. All nine radionuclides values quantified at the E-lab were biased high when compared to reference values.

TABLE 7.3.2							
INITIAL RESULTS ON FILTER (NON-CONFORMITY ON Fe-59)							
Sample Media:	Filter			Sample Date:			3/19/2009
Analytics #:	E56570-05			Sample Units:			pCi
Radionuclide	JAF			REFERENCE			%Recovery
Ce-141	131	±	1.3	115	±	1.92	114%
Cr-51	435	±	7.9	370	±	6.18	118%
Cs-134	134	±	2.0	114	±	1.9	118%
Cs-137	150	±	1.8	135	±	2.25	111%
Co-58	168	±	2.0	145	±	2.41	116%
Mn-54	191	±	2.1	155	±	2.59	123%
Fe-59	153	±	2.3	121	±	2.02	126%
Zn-65	233	±	3.9	189	±	3.16	123%
Co-60	193	±	1.7	173	±	2.88	112%

Reviewed JAF E-lab data from prior years and observed a high bias for this media starting in 2008. In November of 2007, a new 16SF source geometry was purchased. The 16SF source geometry is a quarterly composite filter geometry. It was very similar to the old 16SF geometry. However, the petri dish used in our new 16SF source geometry is slightly deeper and the filters used in our new source geometry aren't as tightly packed as the old model. Sample geometry should match source geometry as close as possible to ensure accurate measurements are obtained. Existing guidance for preparing a QC filter composite sample directs the use of extra material to ensure filters are compressed; however this was for the old 16SF source geometry. Extra material to compress the filters when preparing the QC filter composite sample is no longer needed. We have stopped using extra material to compress QC filters when preparing for analysis.

To validate the cause and resolution for exceeding 25% error on Fe-59, the QC sample was prepared again without using additional packing material. The results were in good agreement and are presented below.

TABLE 7.3.3							
REANALYSIS ON FILTER WITH OUT PACKING MATERIAL							
Sample Media:	Filter			Sample Date:			3/19/2009
Analytics #:	E56570-05			Sample Units:			pCi
Radionuclide	JAF			REFERENCE			%Recovery
Ce-141	107	±	4.2	115	±	1.92	93%
Cr-51	326	±	34.0	370	±	6.18	88%
Cs-134	120	±	3.2	114	±	1.9	106%
Cs-137	131	±	2.8	135	±	2.25	97%
Co-58	141	±	4.1	145	±	2.41	97%
Mn-54	164	±	3.4	155	±	2.59	106%
Fe-59	126	±	6.1	121	±	2.02	104%
Zn-65	202	±	6.5	189	±	3.16	107%
Co-60	174	±	2.8	173	±	2.88	100%

The E-lab "Guidance for the Processing and Reporting of Blind Spike Quality Assurance Samples" was updated in the Procedures Reference and Laboratory Manual. In addition, a section was added to the guidance document concerning impact of future geometry changes to the JAF E-lab QA program. The following results were obtained on next available QA Spiked Air Particulate Filter.

Table 7.3.4

BLIND QA SPIKE SAMPLE FOLLOWING CHANGE

Sample Media:	Filter			Sample Date:			9/17/2009
Analytics #:	E6838-05			Sample Units:			pCi
Radionuclide	JAF			REFERENCE			%Recovery
Ce-141	232	±	2.1	234	±	3.91	99%
Cr-51	180	±	8.2	188	±	3.15	96%
Cs-134	111	±	2.3	105	±	1.75	106%
Cs-137	156	±	2.2	158	±	2.63	99%
Co-58	83.3	±	1.7	84.8	±	1.42	98%
Mn-54	185	±	2.5	176	±	2.93	105%
Fe-59	136	±	2.7	126	±	2.1	108%
Zn-65	192	±	4.2	174	±	2.9	110%
Co-60	132	±	1.7	137	±	2.28	96%

Note: The geometry change did not have an impact on client filters as they are not compressed prior to analysis. Additionally, no plant related radionuclides have been detected in client air particulate filter composites in the past 2 years.

7.3.5 NUMERICAL RESULTS TABLES

TABLE 7.3.5
INTERLABORATORY INTERCOMPARISON PROGRAM
Gross Beta Analysis of Air Particulate Filter

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi ±1 sigma	REFERENCE LAB* pCi ±1 sigma	RATIO (1)
06/18/2009	E6758-05	Filter	GROSS BETA	1.15E+02 ± 1.90E+00 1.18E+02 ± 1.92E+00 1.16E+02 ± 1.91E+00 Mean = 1.16E+02 ± 1.10E+00	1.08E+02 ± 1.80E+00	1.08 A
06/18/2009	E6723-09	Filter	GROSS BETA	1.05E+02 ± 1.82E+00 1.04E+02 ± 1.81E+00 1.07E+02 ± 1.83E+00 Mean = 1.05E+02 ± 1.05E+00	9.88E+01 ± 1.65E+00	1.07 A
12/10/2009	E6960-05	Filter	GROSS BETA	1.08E+02 ± 2.56E+00 1.07E+02 ± 2.55E+00 1.07E+02 ± 2.54E+00 Mean = 1.07E+02 ± 1.47E+00	9.80E+01 ± 1.64E+00	1.09 A

(1) Ratio = Reported/Analytics
* Sample provided by Eckert & Ziegler Analytics, Inc.
A=Acceptable
U=Unacceptable

TABLE 7.3.5 (Continued)
Tritium Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
3/19/2009	E6568-05	Water	H-3	4.81E+03 ± 1.64E+02 4.94E+03 ± 1.65E+02 4.86E+03 ± 1.65E+02 Mean = 4.87E+03 ± 9.51E+01	4.48E+03 ± 7.48E+01	1.09 A
6/18/2009	E6757-05	Water	H-3	9.39E+02 ± 1.32E+02 9.55E+02 ± 1.32E+02 9.95E+02 ± 1.33E+02 Mean = 9.63E+02 ± 7.64E+01	9.71E+02 ± 1.62E+01	0.99 A
9/17/2009	E6842-05	Water	H-3	1.05E+03 ± 1.34E+02 9.10E+02 ± 1.33E+02 1.01E+03 ± 1.33E+02 Mean = 9.91E+02 ± 7.70E+01	9.91E+02 ± 1.66E+01	1.00 A
12/10/2009	E6957-09	Water	H-3	1.49E+04 ± 2.30E+02 1.45E+04 ± 2.28E+02 1.43E+04 ± 2.27E+02 Mean = 1.46E+04 ± 1.32E+02	1.40E+04 ± 2.33E+02	1.04 A
12/10/2009	E6958-09	Water	H-3	1.45E+04 ± 2.28E+02 1.43E+04 ± 2.26E+02 1.45E+04 ± 2.28E+02 Mean = 1.44E+04 ± 1.31E+02	1.40E+04 ± 2.33E+02	1.03 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

A=Acceptable

U=Unacceptable

TABLE 7.3.5 (Continued)
Gross Beta Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
03/19/2009	E6571-05	Water	GROSS BETA	2.34E+02 ± 2.40E+00 2.33E+02 ± 2.40E+00 2.31E+02 ± 2.40E+00 Mean = 2.33E+02 ± 1.39E+00	2.35E+02 ± 3.92E+00	0.99 A
06/18/2009	E6763-05	Water	GROSS BETA	2.59E+02 ± 2.60E+00 2.61E+02 ± 2.60E+00 2.55E+02 ± 2.60E+00 Mean = 2.58E+02 ± 1.50E+00	2.77E+02 ± 4.63E+00	0.93 A
09/17/2009	E6841-05	Water	GROSS BETA	2.20E+02 ± 2.30E+00 2.15E+02 ± 2.30E+00 2.20E+02 ± 2.30E+00 Mean = 2.18E+02 ± 1.33E+00	2.23E+02 ± 3.72E+00	0.98 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

A=Acceptable

U=Unacceptable

TABLE 7.3.5 (Continued)
I-131 Gamma Analysis of Air Charcoal

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi ±1 sigma	REFERENCE LAB* pCi ±1 sigma	RATIO (1)
3/19/2009	E6544-09	Air	I-131	8.30E+01 ± 1.55E+00 8.60E+01 ± 3.04E+00 8.50E+01 ± 3.21E+00 Mean = 8.47E+01 ± 1.56E+00	7.93E+01 ± 1.32E+00	1.07 A
6/18/2009	E6761-05	Air	I-131	9.20E+01 ± 2.57E+00 8.79E+01 ± 2.49E+00 8.90E+01 ± 1.34E+00 Mean = 8.96E+01 ± 1.27E+00	9.47E+01 ± 1.58E+00	0.95 A
9/17/2009	E6840-05	Air	I-131	8.98E+01 ± 2.63E+00 8.74E+01 ± 2.98E+00 8.67E+01 ± 3.04E+00 Mean = 8.80E+01 ± 1.67E+00	9.19E+01 ± 1.54E+00	0.96 A
9/17/2009	E683109	Air	I-131	9.24E+01 ± 2.74E+00 9.17E+01 ± 1.69E+00 9.13E+01 ± 2.93E+00 Mean = 9.18E+01 ± 1.45E+00	9.17E+01 ± 1.53E+00	1.00 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

A=Acceptable

U=Unacceptable

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gross Beta Analysis of Air Particulate Filter

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi ±1 sigma	REFERENCE LAB* pCi ±1 sigma	RATIO (1)
06/18/2009	E6758-05	Filter	GROSS BETA	1.15E+02 ± 1.90E+00 1.18E+02 ± 1.92E+00 1.16E+02 ± 1.91E+00 Mean = 1.16E+02 ± 1.10E+00	1.08E+02 ± 1.80E+00	1.08 A
06/18/2009	E6723-09	Filter	GROSS BETA	1.05E+02 ± 1.82E+00 1.04E+02 ± 1.81E+00 1.07E+02 ± 1.83E+00 Mean = 1.05E+02 ± 1.05E+00	9.88E+01 ± 1.65E+00	1.07 A
12/10/2009	E6960-05	Filter	GROSS BETA	1.08E+02 ± 2.56E+00 1.07E+02 ± 2.55E+00 1.07E+02 ± 2.54E+00 Mean = 1.07E+02 ± 1.47E+00	9.80E+01 ± 1.64E+00	1.09 A

(1) Ratio = Reported/Analytics
* Sample provided by Eckert & Ziegler Analytics, Inc.
A=Acceptable
U=Unacceptable

TABLE 7.3.5 (Continued)
Tritium Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
3/19/2009	E6568-05	Water	H-3	4.81E+03 ± 1.64E+02 4.94E+03 ± 1.65E+02 4.86E+03 ± 1.65E+02 Mean = 4.87E+03 ± 9.51E+01	4.48E+03 ± 7.48E+01	1.09 A
6/18/2009	E6757-05	Water	H-3	9.39E+02 ± 1.32E+02 9.55E+02 ± 1.32E+02 9.95E+02 ± 1.33E+02 Mean = 9.63E+02 ± 7.64E+01	9.71E+02 ± 1.62E+01	0.99 A
9/17/2009	E6842-05	Water	H-3	1.05E+03 ± 1.34E+02 9.10E+02 ± 1.33E+02 1.01E+03 ± 1.33E+02 Mean = 9.91E+02 ± 7.70E+01	9.91E+02 ± 1.66E+01	1.00 A
12/10/2009	E6957-09	Water	H-3	1.49E+04 ± 2.30E+02 1.45E+04 ± 2.28E+02 1.43E+04 ± 2.27E+02 Mean = 1.46E+04 ± 1.32E+02	1.40E+04 ± 2.33E+02	1.04 A
12/10/2009	E6958-09	Water	H-3	1.45E+04 ± 2.28E+02 1.43E+04 ± 2.26E+02 1.45E+04 ± 2.28E+02 Mean = 1.44E+04 ± 1.31E+02	1.40E+04 ± 2.33E+02	1.03 A

(1) Ratio = Reported/Analytics
* Sample provided by Eckert & Ziegler Analytics, Inc.

Table 7.3.5 (continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
6/18/2009	E6722-09	Water	Ce-141	2.19E+02 ± 7.10E+00 2.18E+02 ± 7.42E+00 2.22E+02 ± 4.21E+00 Mean = 2.20E+02 ± 3.70E+00	2.16E+02 ± 3.60E+00	1.02 A
			Cr-51	2.77E+02 ± 3.12E+01 2.93E+02 ± 3.14E+01 3.09E+02 ± 2.02E+01 Mean = 2.93E+02 ± 1.62E+01	3.04E+02 ± 5.08E+00	0.96 A
			Cs-134	1.24E+02 ± 4.58E+00 1.27E+02 ± 4.80E+00 1.38E+02 ± 3.13E+00 Mean = 1.30E+02 ± 2.45E+00	1.26E+02 ± 2.10E+00	1.03 A
			Cs-137	1.40E+02 ± 4.66E+00 1.44E+02 ± 4.73E+00 1.45E+02 ± 3.01E+00 Mean = 1.43E+02 ± 2.43E+00	1.46E+02 ± 2.43E+00	0.98 A
			Co-58	6.74E+01 ± 3.96E+00 7.12E+01 ± 4.14E+00 7.54E+01 ± 2.55E+00 Mean = 7.13E+01 ± 2.09E+00	6.98E+01 ± 1.17E+00	1.02 A
			Mn-54	1.07E+02 ± 4.23E+00 1.07E+02 ± 4.51E+00 1.07E+02 ± 2.87E+00 Mean = 1.07E+02 ± 2.27E+00	1.04E+02 ± 1.74E+00	1.03 A
			Fe-59	1.02E+02 ± 5.50E+00 9.63E+01 ± 5.65E+00 9.66E+01 ± 3.75E+00 Mean = 9.83E+01 ± 2.91E+00	9.29E+01 ± 1.55E+00	1.06 A
			Zn-65	1.41E+02 ± 8.34E+00 1.57E+02 ± 8.56E+00 1.39E+02 ± 5.26E+00 Mean = 1.46E+02 ± 4.35E+00	1.33E+02 ± 2.22E+00	1.10 A
			Co-60	2.53E+02 ± 4.63E+00 2.43E+02 ± 4.72E+00 2.42E+02 ± 2.99E+00 Mean = 2.46E+02 ± 2.42E+00	2.37E+02 ± 3.95E+00	1.04 A
			I-131**	8.41E+01 ± 4.42E+00 9.26E+01 ± 4.28E+00 9.55E+01 ± 3.98E+00 Mean = 9.07E+01 ± 1.83E+00	8.83E+01 ± 1.47E+00	1.03 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
9/17/2009	E6837-05	Water	Ce-141	2.77E+02 ± 3.61E+00 2.69E+02 ± 6.49E+00 2.61E+02 ± 6.66E+00 Mean = 2.69E+02 ± 3.33E+00	2.64E+02 ± 4.40E+00	1.02 A
			Cr-51	2.24E+02 ± 1.26E+01 2.10E+02 ± 2.22E+01 2.20E+02 ± 2.82E+01 Mean = 2.18E+02 ± 1.27E+01	2.12E+02 ± 3.54E+00	1.03 A
			Cs-134	1.26E+02 ± 2.15E+00 1.21E+02 ± 4.13E+00 1.25E+02 ± 5.23E+00 Mean = 1.24E+02 ± 2.33E+00	1.18E+02 ± 1.97E+00	1.05 A
			Cs-137	1.77E+02 ± 2.40E+00 1.76E+02 ± 4.67E+00 1.79E+02 ± 5.37E+00 Mean = 1.77E+02 ± 2.50E+00	1.77E+02 ± 2.96E+00	1.00 A
			Co-58	9.64E+01 ± 1.91E+00 9.90E+01 ± 4.02E+00 9.12E+01 ± 4.23E+00 Mean = 9.55E+01 ± 2.05E+00	9.54E+01 ± 1.59E+00	1.00 A
			Mn-54	2.14E+02 ± 2.64E+00 2.08E+02 ± 5.07E+00 2.04E+02 ± 5.96E+00 Mean = 2.09E+02 ± 2.75E+00	1.98E+02 ± 3.30E+00	1.05 A
			Fe-59	1.55E+02 ± 2.73E+00 1.52E+02 ± 5.29E+00 1.48E+02 ± 6.36E+00 Mean = 1.52E+02 ± 2.90E+00	1.41E+02 ± 2.36E+00	1.08 A
			Zn-65	2.14E+02 ± 4.25E+00 2.25E+02 ± 8.57E+00 2.05E+02 ± 9.89E+00 Mean = 2.15E+02 ± 4.59E+00	1.95E+02 ± 3.26E+00	1.10 A
			Co-60	1.55E+02 ± 1.73E+00 1.53E+02 ± 3.42E+00 1.58E+02 ± 4.11E+00 Mean = 1.55E+02 ± 1.87E+00	1.54E+02 ± 2.57E+00	1.01 A
			I-131**	1.00E+02 ± 1.19E+00 9.91E+01 ± 3.05E+00 1.01E+02 ± 2.92E+00 Mean = 1.00E+02 ± 1.46E+00	9.84E+01 ± 1.64E+00	1.02 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Water

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
12/10/2009	E6959-09	Water	Ce-141	2.14E+02 ± 8.89E+00 2.14E+02 ± 4.58E+00 2.01E+02 ± 9.53E+00 Mean = 2.10E+02 ± 4.60E+00	2.04E+02 ± 3.41E+00	1.03 A
			Cr-51	5.40E+02 ± 4.35E+01 5.37E+02 ± 2.11E+01 5.36E+02 ± 4.64E+01 Mean = 5.38E+02 ± 2.23E+01	5.54E+02 ± 9.25E+00	0.97 A
			Cs-134	2.62E+02 ± 7.33E+00 2.60E+02 ± 3.69E+00 2.67E+02 ± 7.12E+00 Mean = 2.63E+02 ± 3.62E+00	2.55E+02 ± 4.26E+00	1.03 A
			Cs-137	1.64E+02 ± 5.87E+00 1.82E+02 ± 3.00E+00 1.77E+02 ± 5.71E+00 Mean = 1.74E+02 ± 2.91E+00	1.81E+02 ± 3.02E+00	0.96 A
			Co-58	2.18E+02 ± 6.96E+00 2.14E+02 ± 3.28E+00 2.28E+02 ± 6.54E+00 Mean = 2.20E+02 ± 3.37E+00	2.13E+02 ± 3.56E+00	1.03 A
			Mn-54	1.99E+02 ± 6.21E+00 1.94E+02 ± 3.12E+00 1.93E+02 ± 6.25E+00 Mean = 1.95E+02 ± 3.12E+00	1.79E+02 ± 3.00E+00	1.09 A
			Fe-59	1.85E+02 ± 8.16E+00 1.90E+02 ± 3.99E+00 2.02E+02 ± 8.10E+00 Mean = 1.92E+02 ± 4.06E+00	1.79E+02 ± 3.00E+00	1.07 A
			Zn-65	3.82E+02 ± 1.34E+01 3.72E+02 ± 6.54E+00 3.96E+02 ± 1.32E+01 Mean = 3.83E+02 ± 6.64E+00	3.48E+02 ± 5.82E+00	1.10 A
			Co-60	2.62E+02 ± 5.43E+00 2.60E+02 ± 2.61E+00 2.58E+02 ± 5.18E+00 Mean = 2.60E+02 ± 2.65E+00	2.58E+02 ± 4.31E+00	1.01 A
			I-131**	9.41E+01 ± 2.11E+00 9.37E+01 ± 5.70E+00 9.05E+01 ± 6.83E+00 Mean = 9.28E+01 ± 3.05E+00	9.61E+01 ± 1.61E+00	0.97 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Milk

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
3/19/2009	E6545-09	MILK	Ce-141	9.19E+01 ± 8.41E+00 8.83E+01 ± 8.48E+00 9.86E+01 ± 3.75E+00 9.36E+01 ± 3.55E+00 Mean = 9.31E+01 ± 3.25E+00	9.49E+01 ± 1.58E+00	0.98 A
			Cr-51	3.18E+02 ± 4.44E+01 3.02E+02 ± 4.52E+01 2.94E+02 ± 2.04E+01 3.04E+02 ± 1.74E+01 Mean = 3.05E+02 ± 1.72E+01	3.05E+02 ± 5.10E+00	1.00 A
			Cs-134	8.97E+01 ± 7.19E+00 9.17E+01 ± 7.67E+00 9.25E+01 ± 2.94E+00 9.26E+01 ± 2.99E+00 Mean = 9.16E+01 ± 2.83E+00	9.37E+01 ± 1.57E+00	0.98 A
			Cs-137	1.10E+02 ± 7.56E+00 9.81E+01 ± 7.53E+00 1.09E+02 ± 3.15E+00 1.05E+02 ± 3.17E+00 Mean = 1.06E+02 ± 2.89E+00	1.11E+02 ± 1.86E+00	0.95 A
			Co-58	1.10E+02 ± 7.89E+00 1.19E+02 ± 8.32E+00 1.19E+02 ± 3.47E+00 1.17E+02 ± 3.48E+00 Mean = 1.16E+02 ± 3.12E+00	1.19E+02 ± 1.99E+00	0.98 A
			Mn-54	1.42E+02 ± 8.51E+00 1.22E+02 ± 8.28E+00 1.42E+02 ± 3.61E+00 1.30E+02 ± 3.49E+00 Mean = 1.34E+02 ± 3.22E+00	1.28E+02 ± 2.13E+00	1.05 A
			Fe-59	1.02E+02 ± 9.68E+00 8.94E+01 ± 9.85E+00 1.13E+02 ± 4.35E+00 1.01E+02 ± 4.29E+00 Mean = 1.01E+02 ± 3.78E+00	9.99E+01 ± 1.67E+00	1.01 A
			Zn-65	1.48E+02 ± 1.58E+01 1.51E+02 ± 6.52E+00 1.63E+02 ± 6.63E+00 Mean = 1.54E+02 ± 6.11E+00	1.56E+02 ± 2.60E+00	0.99 A
			Co-60	1.43E+02 ± 6.60E+00 1.55E+02 ± 6.91E+00 1.34E+02 ± 2.73E+00 1.46E+02 ± 2.91E+00 Mean = 1.45E+02 ± 2.59E+00	1.42E+02 ± 2.38E+00	1.02 A
			I-131**	8.63E+01 ± 2.54E+00 1.02E+02 ± 7.17E+00 8.14E+01 ± 5.34E+00 7.73E+01 ± 3.59E+00 Mean = 8.68E+01 ± 2.49E+00	7.93E+01 ± 1.32E+00	1.09 A

(1) Ratio = Reported/Analytics
A=Acceptable
U=Unacceptable

* Sample provided by Eckert & Ziegler Analytics, Inc.

** Result determined by Resin Extraction/Gamma Spectral Analysis.

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Milk

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma	REFERENCE LAB* pCi/liter ±1 sigma	RATIO (1)
6/18/2009	E6759-05	MILK	Ce-141	2.99E+02 ± 3.04E+00 3.00E+02 ± 6.52E+00 2.95E+02 ± 8.38E+00 Mean = 2.98E+02 ± 3.68E+00	2.84E+02 ± 4.74E+00	1.05 A
			Cr-51	4.17E+02 ± 1.11E+01 3.91E+02 ± 2.61E+01 3.79E+02 ± 3.51E+01 Mean = 3.96E+02 ± 1.50E+01	4.00E+02 ± 6.69E+00	0.99 A
			Cs-134	1.78E+02 ± 2.04E+00 1.55E+02 ± 8.58E+00 1.72E+02 ± 6.73E+00 Mean = 1.68E+02 ± 3.70E+00	1.66E+02 ± 2.77E+00	1.01 A
			Cs-137	1.95E+02 ± 2.14E+00 1.97E+02 ± 5.28E+00 1.85E+02 ± 6.96E+00 Mean = 1.92E+02 ± 3.00E+00	1.92E+02 ± 3.20E+00	1.00 A
			Co-58	9.71E+01 ± 1.59E+00 8.91E+01 ± 3.95E+00 9.06E+01 ± 5.74E+00 Mean = 9.23E+01 ± 2.38E+00	9.19E+01 ± 1.53E+00	1.00 A
			Mn-54	1.45E+02 ± 1.95E+00 1.42E+02 ± 4.54E+00 1.41E+02 ± 6.56E+00 Mean = 1.43E+02 ± 2.74E+00	1.37E+02 ± 2.29E+00	1.04 A
			Fe-59	1.30E+02 ± 2.27E+00 1.29E+02 ± 5.47E+00 1.26E+02 ± 7.83E+00 Mean = 1.28E+02 ± 3.27E+00	1.22E+02 ± 2.04E+00	1.05 A
			Zn-65	1.91E+02 ± 3.66E+00 1.86E+02 ± 8.64E+00 1.82E+02 ± 1.26E+01 Mean = 1.86E+02 ± 5.24E+00	1.75E+02 ± 2.93E+00	1.06 A
			Co-60	3.18E+02 ± 2.05E+00 3.11E+02 ± 4.92E+00 3.10E+02 ± 6.99E+00 Mean = 3.13E+02 ± 2.93E+00	3.12E+02 ± 5.21E+00	1.00 A
			I-131**	9.17E+01 ± 8.96E-01 9.38E+01 ± 2.70E+00 9.50E+01 ± 2.56E+00 Mean = 9.35E+01 ± 1.28E+00	1.02E+02 ± 1.70E+00	0.92 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

** Result determined by Resin Extraction/Gamma Spectral Analysis.

A=Acceptable

U=Unacceptable

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Milk

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/liter ±1 sigma				REFERENCE LAB* pCi/liter ±1 sigma			RATIO (1)
9/17/2009	E6839-05	MILK	Ce-141		2.84E+02	±	7.55E+00	2.75E+02	±	4.59E+00	1.02 A
					2.74E+02	±	3.93E+00				
					2.86E+02	±	7.43E+00				
				Mean =	2.81E+02	±	3.77E+00				
			Cr-51		2.16E+02	±	2.57E+01	2.21E+02	±	3.69E+00	0.94 A
					1.93E+02	±	1.55E+01				
					2.13E+02	±	2.86E+01				
				Mean =	2.07E+02	±	1.38E+01				
			Cs-134		1.17E+02	±	7.61E+00	1.23E+02	±	2.06E+00	1.01 A
					1.30E+02	±	2.57E+00				
					1.27E+02	±	4.73E+00				
				Mean =	1.25E+02	±	3.11E+00				
			Cs-137		1.71E+02	±	4.94E+00	1.85E+02	±	3.09E+00	0.95 A
					1.77E+02	±	2.88E+00				
					1.79E+02	±	5.63E+00				
				Mean =	1.76E+02	±	2.67E+00				
			Co-58		1.06E+02	±	4.03E+00	9.94E+01	±	1.66E+00	1.01 A
					1.01E+02	±	2.28E+00				
					9.29E+01	±	4.75E+00				
				Mean =	1.00E+02	±	2.21E+00				
			Mn-54		2.15E+02	±	5.51E+00	2.06E+02	±	3.44E+00	1.04 A
					2.22E+02	±	3.20E+00				
					2.04E+02	±	5.98E+00				
				Mean =	2.14E+02	±	2.91E+00				
			Fe-59		1.49E+02	±	5.67E+00	1.47E+02	±	2.46E+00	1.05 A
					1.59E+02	±	3.40E+00				
					1.56E+02	±	6.85E+00				
				Mean =	1.55E+02	±	3.17E+00				
			Zn-65		2.16E+02	±	9.24E+00	2.04E+02	±	3.40E+00	1.07 A
					2.21E+02	±	5.43E+00				
					2.19E+02	±	1.07E+01				
				Mean =	2.19E+02	±	5.05E+00				
			Co-60		1.59E+02	±	3.67E+00	1.60E+02	±	2.68E+00	1.00 A
					1.62E+02	±	2.13E+00				
					1.57E+02	±	4.26E+00				
				Mean =	1.59E+02	±	2.00E+00				
			I-131**		9.36E+01	±	1.14E+00	9.86E+01	±	1.65E+00	0.93 A
					9.12E+01	±	2.82E+00				
					8.91E+01	±	2.98E+00				
				Mean =	9.13E+01	±	1.42E+00				
(1) Ratio = Reported/Analytics											
* Sample provided by Eckert & Ziegler Analytics, Inc.											
** Result determined by Resin Extraction/Gamma Spectral Analysis.											
A=Acceptable											
U=Unacceptable											

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Air Particulate Filter

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi ±1 sigma	REFERENCE LAB* pCi ±1 sigma	RATIO (1)
3/19/2009	E6570-05	FILTER	Ce-141	1.33E+02 ± 1.69E+00 1.31E+02 ± 3.28E+00 1.30E+02 ± 1.52E+00 Mean = 1.31E+02 ± 1.33E+00	1.15E+02 ± 1.92E+00	1.14 A
			Cr-51	4.28E+02 ± 1.01E+01 4.63E+02 ± 1.94E+01 4.15E+02 ± 9.20E+00 Mean = 4.35E+02 ± 7.91E+00	3.70E+02 ± 6.18E+00	1.18 A
			Cs-134	1.33E+02 ± 2.20E+00 1.33E+02 ± 5.10E+00 1.36E+02 ± 2.40E+00 Mean = 1.34E+02 ± 2.02E+00	1.14E+02 ± 1.90E+00	1.18 A
			Cs-137	1.52E+02 ± 2.14E+00 1.44E+02 ± 4.55E+00 1.53E+02 ± 2.15E+00 Mean = 1.50E+02 ± 1.82E+00	1.35E+02 ± 2.25E+00	1.11 A
			Co-58	1.70E+02 ± 2.30E+00 1.65E+02 ± 4.94E+00 1.69E+02 ± 2.27E+00 Mean = 1.68E+02 ± 1.97E+00	1.45E+02 ± 2.41E+00	1.16 A
			Mn-54	1.89E+02 ± 2.46E+00 1.92E+02 ± 5.32E+00 1.93E+02 ± 2.52E+00 Mean = 1.91E+02 ± 2.13E+00	1.55E+02 ± 2.59E+00	1.23 A
			Fe-59	1.58E+02 ± 2.81E+00 1.42E+02 ± 5.72E+00 1.58E+02 ± 2.76E+00 Mean = 1.53E+02 ± 2.31E+00	1.21E+02 ± 2.02E+00	1.26 U
			Zn-65	2.33E+02 ± 4.53E+00 2.29E+02 ± 9.63E+00 2.37E+02 ± 4.59E+00 Mean = 2.33E+02 ± 3.86E+00	1.89E+02 ± 3.16E+00	1.23 A
			Co-60	1.95E+02 ± 1.96E+00 1.89E+02 ± 4.34E+00 1.95E+02 ± 2.04E+00 Mean = 1.93E+02 ± 1.73E+00	1.73E+02 ± 2.88E+00	1.12 A

(1) Ratio = Reported/Analytics
* Sample provided by Eckert & Ziegler Analytics, Inc.
A=Acceptable
U=Unacceptable

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Air Particulate Filter

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi ±1 sigma	REFERENCE LAB* pCi ±1 sigma	RATIO (1)
9/17/2009	E6838-05	FILTER	Ce-141	2.36E+02 ± 4.09E+00 2.30E+02 ± 1.95E+00 2.30E+02 ± 4.44E+00 Mean = 2.32E+02 ± 2.11E+00	2.34E+02 ± 3.91E+00	0.99 A
			Cr-51	1.67E+02 ± 1.58E+01 1.79E+02 ± 8.12E+00 1.94E+02 ± 1.69E+01 Mean = 1.80E+02 ± 8.17E+00	1.88E+02 ± 3.15E+00	0.96 A
			Cs-134	1.04E+02 ± 4.61E+00 1.13E+02 ± 2.18E+00 1.17E+02 ± 4.64E+00 Mean = 1.11E+02 ± 2.30E+00	1.05E+02 ± 1.75E+00	1.06 A
			Cs-137	1.57E+02 ± 4.36E+00 1.51E+02 ± 2.28E+00 1.61E+02 ± 4.39E+00 Mean = 1.56E+02 ± 2.20E+00	1.58E+02 ± 2.63E+00	0.99 A
			Co-58	8.50E+01 ± 3.53E+00 8.42E+01 ± 1.83E+00 8.08E+01 ± 3.39E+00 Mean = 8.33E+01 ± 1.74E+00	8.48E+01 ± 1.42E+00	0.98 A
			Mn-54	1.84E+02 ± 4.87E+00 1.77E+02 ± 2.57E+00 1.93E+02 ± 5.02E+00 Mean = 1.85E+02 ± 2.48E+00	1.76E+02 ± 2.93E+00	1.05 A
			Fe-59	1.40E+02 ± 5.35E+00 1.41E+02 ± 2.90E+00 1.28E+02 ± 5.32E+00 Mean = 1.36E+02 ± 2.69E+00	1.26E+02 ± 2.10E+00	1.08 A
			Zn-65	1.88E+02 ± 8.32E+00 1.98E+02 ± 4.35E+00 1.90E+02 ± 8.48E+00 Mean = 1.92E+02 ± 4.22E+00	1.74E+02 ± 2.90E+00	1.10 A
			Co-60	1.38E+02 ± 3.45E+00 1.32E+02 ± 1.86E+00 1.26E+02 ± 3.32E+00 Mean = 1.32E+02 ± 1.71E+00	1.37E+02 ± 2.28E+00	0.96 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

A=Acceptable

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Soil

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/g ±1 sigma	REFERENCE LAB* pCi/g ±1 sigma	RATIO (1)
6/18/2009	E6760-05	SOIL	Ce-141	4.58E-01 ± 1.18E-02 4.39E-01 ± 2.42E-02 4.33E-01 ± 2.36E-02 Mean = 4.43E-01 ± 8.95E-03	4.62E-01 ± 7.72E-03	0.96 A
			Cr-51	6.89E-01 ± 6.85E-02 6.78E-01 ± 1.11E-01 6.46E-01 ± 1.05E-01 Mean = 6.71E-01 ± 4.19E-02	6.52E-01 ± 1.09E-02	1.03 A
			Cs-134	2.94E-01 ± 9.32E-03 2.50E-01 ± 1.93E-02 2.69E-01 ± 1.69E-02 Mean = 2.71E-01 ± 6.82E-03	2.70E-01 ± 4.51E-03	1.00 A
			Cs-137	3.86E-01 ± 1.02E-02 3.76E-01 ± 2.09E-02 4.04E-01 ± 1.85E-02 Mean = 3.89E-01 ± 7.43E-03	4.06E-01 ± 6.78E-03	0.96 A
			Co-58	1.38E-01 ± 7.57E-03 1.37E-01 ± 1.65E-02 1.61E-01 ± 1.47E-02 Mean = 1.45E-01 ± 5.84E-03	1.50E-01 ± 2.51E-03	0.97 A
			Mn-54	2.35E-01 ± 9.13E-03 2.16E-01 ± 2.13E-02 2.34E-01 ± 1.69E-02 Mean = 2.28E-01 ± 7.17E-03	2.23E-01 ± 3.72E-03	1.02 A
			Fe-59	2.14E-01 ± 1.06E-02 1.88E-01 ± 2.34E-02 2.16E-01 ± 2.02E-02 Mean = 2.06E-01 ± 8.17E-03	1.99E-01 ± 3.32E-03	1.04 A
			Zn-65	3.19E-01 ± 1.57E-02 3.18E-01 ± 3.37E-02 3.30E-01 ± 3.01E-02 Mean = 3.22E-01 ± 1.20E-02	2.86E-01 ± 4.78E-03	1.13 A
			Co-60	5.23E-01 ± 9.15E-03 4.97E-01 ± 1.87E-02 4.78E-01 ± 1.56E-02 Mean = 4.99E-01 ± 6.50E-03	5.07E-01 ± 8.47E-03	0.98 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

A=Acceptable

U=Unacceptable

Table 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Vegetation

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/g ±1 sigma	REFERENCE LAB* pCi/g ±1 sigma	RATIO (1)
6/18/2009	E6762-05	VEG	Ce-141	3.93E-01 ± 1.26E-02 3.96E-01 ± 1.46E-02 3.87E-01 ± 6.92E-03 3.94E-01 ± 1.20E-02 Mean = 3.93E-01 ± 5.94E-03	4.10E-01 ± 6.85E-03	0.96 A
			Cr-51	4.88E-01 ± 5.04E-02 5.19E-01 ± 5.88E-02 5.33E-01 ± 3.28E-02 6.47E-01 ± 5.81E-02 Mean = 5.47E-01 ± 2.56E-02	5.78E-01 ± 9.65E-03	0.95 A
			Cs-134	2.63E-01 ± 1.09E-02 2.64E-01 ± 1.50E-02 2.75E-01 ± 7.31E-03 2.50E-01 ± 8.19E-03 Mean = 2.63E-01 ± 5.39E-03	2.39E-01 ± 3.99E-03	1.10 A
			Cs-137	2.65E-01 ± 1.05E-02 2.72E-01 ± 1.32E-02 2.50E-01 ± 6.74E-03 2.66E-01 ± 7.82E-03 Mean = 2.63E-01 ± 4.94E-03	2.77E-01 ± 4.63E-03	0.95 A
			Co-58	1.21E-01 ± 7.80E-03 1.23E-01 ± 1.06E-02 1.18E-01 ± 5.01E-03 1.20E-01 ± 7.39E-03 Mean = 1.21E-01 ± 3.98E-03	1.33E-01 ± 2.22E-03	0.91 A
			Mn-54	1.97E-01 ± 9.87E-03 1.91E-01 ± 1.29E-02 1.86E-01 ± 6.51E-03 2.05E-01 ± 8.74E-03 Mean = 1.95E-01 ± 4.89E-03	1.98E-01 ± 3.31E-03	0.98 A
			Fe-59	1.68E-01 ± 1.13E-02 1.83E-01 ± 1.47E-02 1.64E-01 ± 8.18E-03 1.71E-01 ± 1.12E-02 Mean = 1.72E-01 ± 5.79E-03	1.77E-01 ± 2.96E-03	0.97 A
			Zn-65	2.37E-01 ± 1.93E-02 2.52E-01 ± 2.30E-02 2.33E-01 ± 1.35E-02 2.73E-01 ± 1.38E-02 Mean = 2.49E-01 ± 8.92E-03	2.53E-01 ± 4.23E-03	0.98 A
			Co-60	4.40E-01 ± 1.03E-02 4.27E-01 ± 1.32E-02 4.28E-01 ± 6.96E-03 4.16E-01 ± 7.77E-03 Mean = 4.28E-01 ± 4.93E-03	4.50E-01 ± 7.52E-03	0.95 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

A=Acceptable

U=Unacceptable

TABLE 7.3.5 (Continued)
INTERLABORATORY INTERCOMPARISON PROGRAM
Gamma Analysis of Vegetation

DATE	SAMPLE ID NO.	MEDIUM	ANALYSIS	JAF E-LAB RESULTS pCi/g ±1 sigma	REFERENCE LAB* pCi/g ±1 sigma	RATIO (1)
9/17/2009	E6832-09	VEG	Ce-141	6.92E-01 ± 1.50E-02 6.91E-01 ± 9.31E-03 7.15E-01 ± 1.55E-02 Mean = 6.99E-01 ± 7.83E-03	6.54E-01 ± 1.09E-02	1.07 A
			Cr-51	5.12E-01 ± 5.80E-02 5.44E-01 ± 3.83E-02 5.69E-01 ± 6.52E-02 Mean = 5.42E-01 ± 3.18E-02	5.26E-01 ± 8.78E-03	1.03 A
			Cs-134	3.72E-01 ± 1.25E-02 3.42E-01 ± 7.99E-03 3.59E-01 ± 1.24E-02 Mean = 3.58E-01 ± 6.45E-03	2.93E-01 ± 4.89E-03	1.22 A
			Cs-137	4.76E-01 ± 1.32E-02 4.57E-01 ± 8.28E-03 4.44E-01 ± 1.27E-02 Mean = 4.59E-01 ± 6.70E-03	4.40E-01 ± 7.35E-03	1.04 A
			Co-58	2.42E-01 ± 1.08E-02 2.50E-01 ± 6.69E-03 2.43E-01 ± 1.04E-02 Mean = 2.45E-01 ± 5.47E-03	2.37E-01 ± 3.96E-03	1.03 A
			Mn-54	5.32E-01 ± 1.44E-02 5.44E-01 ± 9.24E-03 5.47E-01 ± 1.41E-02 Mean = 5.41E-01 ± 7.39E-03	4.91E-01 ± 8.20E-03	1.10 A
			Fe-59	3.88E-01 ± 1.56E-02 3.97E-01 ± 1.01E-02 3.71E-01 ± 1.54E-02 Mean = 3.85E-01 ± 8.05E-03	3.50E-01 ± 5.85E-03	1.10 A
			Zn-65	5.74E-01 ± 2.50E-02 5.40E-01 ± 1.58E-02 5.28E-01 ± 2.40E-02 Mean = 5.47E-01 ± 1.27E-02	4.85E-01 ± 8.10E-03	1.13 A
			Co-60	4.01E-01 ± 1.01E-02 3.97E-01 ± 6.33E-03 3.99E-01 ± 9.63E-03 Mean = 3.99E-01 ± 3.83E-03	3.82E-01 ± 6.38E-03	1.04 A

(1) Ratio = Reported/Analytics

* Sample provided by Eckert & Ziegler Analytics, Inc.

A=Acceptable

U=Unacceptable

7.3.6 REFERENCES

7.3.6.1 Radioactivity and Radiochemistry, The Counting Room: Special Edition, 1994 Caretaker Publications, Atlanta, Georgia.

7.3.6.2 Data Reduction and Error Analysis for the Physical Sciences, Bevington P.R., McGraw Hill, New York (1969).

8. Land Use Census

The Vermont Yankee Nuclear Power Station Off-site Dose Calculation Manual 3/4.5.2 requires that a Land Use Census be conducted annually between the dates of June 1 and October 1. The census identifies the locations of the nearest milk animal and the nearest residence in each of the 16 meteorological sectors within a distance of five miles of the plant. The census also identifies the nearest milk animal (within three miles of the plant) to the point of predicted highest annual average D/Q (deposition factor for dry deposition of elemental radionuclides and other particulates) value due to elevated releases from the plant stack in each of the three major meteorological sectors. The 2009 Land Use Census was conducted in the summer of 2009 in accordance with the ODCM.

Following the collection of field data and in compliance with Off-site Dose Calculation Manual (ODCM) Section 10.1, a dosimetric analysis would be performed to compare the census locations to the "critical receptor" identified in the ODCM. This critical receptor is the location that is used in the Method 1 screening dose calculations found in the ODCM (i.e. the dose calculations done in compliance with ODCM Surveillance 4.3.3). If a census location has a 20% greater potential dose than that of the critical receptor, this fact must be announced in the annual Radioactive Effluent Release Report for that period. A re-evaluation of the critical receptor would also be done at that time. No changes in the census data from year 2008 occurred in the 2009 census; therefore no revisions of the 2008 calculations were required.

Pursuant to ODCM 3.5.2.a, a dosimetric analysis would be performed, using site specific meteorological data, to determine which milk animal locations would provide the optimal sampling locations. If any location had experienced a 20% greater potential dose commitment than at a currently sampled location, the new location would be added to the routine environmental sampling program in replacement of the location with the lowest calculated dose (which is eliminated from the program). The 2009 Land Use Census did not identify any locations, meeting the criteria of ODCM Table 3.5.1, with a greater potential dose commitment than at currently sampled locations. No changes to the Radiological Environmental Monitoring Program (REMP) were required based on the Land Use Census.

The results of the 2009 Land Use Census are included in this report in compliance with ODCM 4.5.2 and ODCM 10.2. The locations identified during the census may be found in Table 8.1.

TABLE 8.1

2009 LAND USE CENSUS LOCATIONS*

SECTOR	NEAREST RESIDENCE Km (Mi)	NEAREST MILK ANIMAL Km (Mi)
N	1.4 (0.9)	----
NNE	1.4 (0.9)	5.5 (3.4) Cows
NE	1.3 (0.8)	----
ENE	1.0 (0.6)	----
E	0.9 (0.6)	----
ESE	1.9 (1.1)	----
SE	2.0 (1.2)	3.6 (2.2) Cows**
SSE	2.1 (1.3)	----
S	0.6 (0.4)	2.2 (1.4) Cows**
SSW	0.5 (0.3)	----
SW	0.4 (0.3)	8.2 (5.1) Cows
WSW	0.5 (0.3)	----
W	0.6 (0.4)	0.8 (0.5) Cows
WNW	1.1 (0.7)	----
NW	2.3 (1.4)	----
NNW	1.7 (1.0)	----

* Sectors and distances are relative to the plant stack as determined by a Global Positioning System survey conducted in 1997.

** Location of nearest milk animal within 3 miles of the plant to the point of predicted highest annual average D/Q value in each of the three major meteorological sectors.

9. SUMMARY

During 2009 as in all previous years of plant operation, a program was conducted to assess the levels of radiation or radioactivity in the Vermont Yankee Nuclear Power Station environment. Over 1000 samples were collected (including TLDs) over the course of the year, with a total of over 2700 radionuclide or exposure rate analyses performed. The samples included groundwater, river water, sediment, fish, milk, silage, mixed grass, storm drain sediment, and storm drain water. In addition to these samples, the air surrounding the plant was sampled continuously and the radiation levels were measured continuously with environmental TLDs.

Three of the objectives of the Radiological Environmental Monitoring Program (REMP) are:

- To provide an early indication of the appearance or accumulation of any radioactive material in the environment caused by the operation of the station.
- To provide assurance to regulatory agencies and the public that the station's environmental impact is known and within anticipated limits.
- To verify the adequacy and proper functioning of station effluent controls and monitoring systems. .

Low levels of radioactivity from three sources (discussed below) were detected in samples collected off-site as a part of the radiological environmental monitoring program. Most samples had measurable levels of naturally-occurring K-40, Be-7, Th-232 or radon daughter products. These are the most common of the naturally-occurring radionuclides.

Samples of milk and sediment contained fallout radioactivity such as Cs-137 and Sr-90 from atmospheric nuclear weapons tests conducted primarily from the late 1950s through 1980.

Several sediment samples from onsite locations (from the plant storm drain system) had low levels of radioactivity resulting from emissions from the Vermont Yankee plant. In all cases, the possible radiological impact was negligible with respect to exposure from natural background radiation. In no case did the detected levels exceed the most restrictive federal regulatory or plant license limits for radionuclides in the environment. Measured values were several orders of magnitude below reportable levels listed in Table 4.5.

Tritium at concentrations higher than background levels was detected in one of the three shoreline groundwater monitoring wells installed in 2007 in response to industry events and Entergy's response to

Nuclear Electrical Institute's (NEI's) Groundwater Protection Initiative 07-07. The sample collected in the fourth quarter 2009 from shoreline well GZ-3 was determined to contain tritium at approximately 705 picocuries per liter. This concentration is just slightly above minimum detectable concentration for this radionuclide at our offsite environmental laboratory. When this data was received at the Vermont Yankee plant site on January 6th, 2010, extensive investigation and corrective actions were undertaken to find the source of trititated water contamination into the subsurface groundwater layer and to curtail the release pathway. Further steps to remediate the contamination of the subsurface groundwater layer under the plant site have been initiated. More detail of this event is provided in the 2009 Annual Radioactive Effluent Release Report

10. REFERENCES

1. USNRC Radiological Assessment Branch Technical Position, "An Acceptable Radiological Environmental Monitoring Program," Revision 1, November 1979.

2. NCRP Report No. 94, *Exposure of the Population in the United States and Canada from Natural Background Radiation,* National Council on Radiation Protection and Measurements, 1987.

3. *Ionizing Radiation: Sources and Biological Effects,* United Nations Scientific Committee on the Effects of Atomic Radiation (UNSCEAR), 1982 Report to the General Assembly.

4. Kathren, Ronald L., *Radioactivity and the Environment - Sources, Distribution, and Surveillance,* Harwood Academic Publishers, New York, 1984.

5. Till, John E. and Robert H. Meyer, ed., *Radiological Assessment - A Textbook on Environmental Dose Analysis,* NUREG/CR-3332, U.S. Nuclear Regulatory Commission, Washington, D.C., 1983.

6. NUREG/CR-3130, *Influence of Leach Rate and Other Parameters on Groundwater Migration,* February 1983.