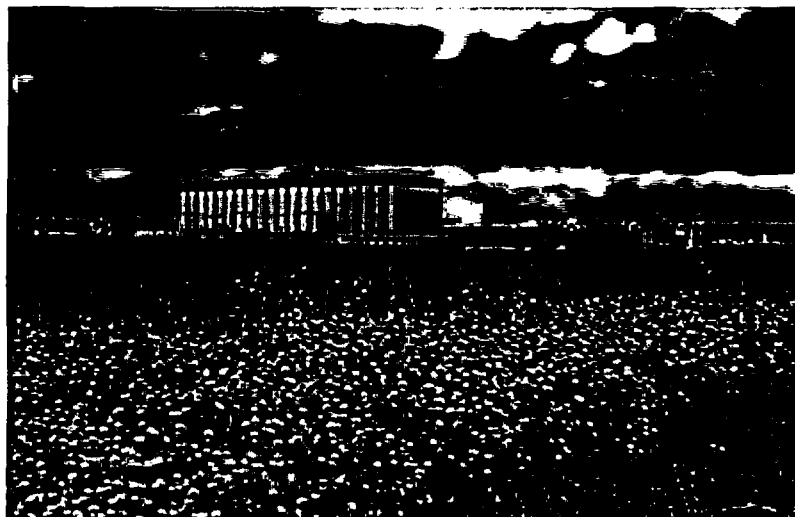


**ENCLOSURE 2**

**Joseph M. Farley Nuclear Plant  
Annual Radiological Environmental Operating Report for 2004**

**JOSEPH M. FARLEY NUCLEAR PLANT  
ANNUAL RADIOLOGICAL ENVIRONMENTAL  
OPERATING REPORT FOR 2004**



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## **LIST OF ACRONYMS**

Acronyms presented in alphabetical order

<b>Acronym</b>	<b>Definition</b>
APCo	Alabama Power Company
ASTM	American Society for Testing and Materials
CL	Confidence Level
EL	Georgia Power Company Environmental Laboratory
EPA	Environmental Protection Agency
FNP	Joseph M. Farley Nuclear Plant
ICP	Interlaboratory Comparison Program
MDC	Minimum Detectable Concentration
MDD	Minimum Detectable Difference
MWe	MegaWatts Electric
NA	Not Applicable
NDM	No Detectable Measurement(s)
NRC	Nuclear Regulatory Commission
ODCM	Offsite Dose Calculation Manual
Po	Preoperation
PWR	Pressurized Water Reactor
REMP	Radiological Environmental Monitoring Program
RL	Reporting Level
RM	River Mile
TLD	Thermoluminescent Dosimeter
TS	Technical Specification

## 1.0 INTRODUCTION

The Radiological Environmental Monitoring Program (REMP) for 2004 was conducted in accordance with Chapter 4 of the Offsite Dose Calculation Manual (ODCM). The REMP activities for 2004 are reported herein in accordance with Technical Specification (TS) 5.6.2 and ODCM 7.1.

The objectives of the REMP are to:

- 1) Determine the levels of radiation and the concentrations of radioactivity in the environs and;
- 2) Assess the radiological impact (if any) to the environment due to the operation of the Joseph M. Farley Nuclear Plant (FNP).

The assessments include comparisons between results of analyses of samples obtained at locations where radiological levels are not expected to be affected by plant operation (control stations) and at locations where radiological levels are more likely to be affected by plant operation (indicator stations), as well as comparisons between preoperational and operational sample results.

FNP is owned by Alabama Power Company (APCo) and operated by Southern Nuclear Operating Company. It is located in Houston County, Alabama approximately fifteen miles east of Dothan, Alabama on the west bank of the Chattahoochee River. Unit 1, a Westinghouse Electric Corporation Pressurized Water Reactor (PWR) with a licensed core thermal power output of 2775 MegaWatts thermal (MWt), achieved initial criticality on August 9, 1977 and was declared "commercial" on December 1, 1977. Unit 2, also a 2775 MWt Westinghouse PWR, achieved initial criticality on May 8, 1981 and was declared "commercial" on July 30, 1981.

The preoperational stage of the REMP began with initial sample collections in January of 1975. The transition from the preoperational to the operational stage of the REMP was marked by Unit 1 initial criticality.

A description of the REMP is provided in Section 2 of this report. An annual summary of the results of the analyses of REMP samples is provided in Section 3. A discussion of the results, including assessments of any radiological impacts upon the environment and the results of the land use census are provided in Section 4. The results of the Interlaboratory Comparison Program (ICP) are provided in Section 5. Conclusions are provided in Section 6.

## 2.0 REMP DESCRIPTION

A summary description of the REMP is provided in Table 2-1. This table summarizes the program as it meets the requirements outlined in ODCM Table 4-1. It details the sample types to be collected and the analyses to be performed in order to monitor the airborne, direct radiation, waterborne and ingestion pathways, and also delineates the collection and analysis frequencies. In addition, Table 2-1 describes the locations of the indicator, community and control stations as described in ODCM Table 4-4 and the identification of each sample according to station location and analysis type. The stations are also depicted on maps in Figures 2-1 through 2-3.

The location of each REMP station for gaseous releases is described by its direction and distance from a point midway between the Unit 1 and Unit 2 plant vent stacks. The surrounding area is divided into 16 azimuthal sectors which are centered on the major compass points; each sector is numbered sequentially clockwise and oriented so that the centerline of sector 16 is due north. Each sampling station is identified by a four digit number. The first two digits indicate the sector number, and the last two digits indicate the distance from the origin to the nearest mile. For example, air monitoring station 0215 is located approximately 15 miles northeast of the origin. The locations for the sampling stations along the river are identified by the nearest River Mile (RM) which is the distance along the navigable portion of the Chattahoochee River upstream of the Jim Woodruff Dam near Chattahoochee, Florida. The approximate locations of the plant discharge and intake structures are at RM 43.5 and 43.8, respectively.

The samples are collected by the plant's technical staff, except for fish and river sediment samples which are collected by APCo Environmental Field Services personnel.

All laboratory analyses were performed by Georgia Power Company's Environmental Laboratory (EL) in Smyrna, Georgia.

**TABLE 2-1 (SHEET 1 of 7)**

**SUMMARY DESCRIPTION OF RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM**

<b>Exposure Pathway with Sample Types and Locations (sector-miles)</b>	<b>Sample Identification</b>	<b>Sampling and Collection Frequency</b>	<b>Type and Frequency of Analysis</b>
<u>AIRBORNE Particulates</u>		Continuous sampler operation with sample collection weekly.	Particulate sampler: Analyze for gross beta radioactivity $\geq$ 24 hours following filter change. Perform gamma isotopic analysis on each sample when gross beta activity is $>$ 10 times the yearly mean of control samples. Perform gamma isotopic analysis on composite sample (by location) quarterly.
Indicator Stations: River Intake Structure (ESE-0.8) South Perimeter (SSE-1.0) Plant Entrance (WSW-0.9) North Perimeter (N-0.8)	PI-0501  PI-0701  PI-1101  PI-1601		
Control Stations: Blakely GA (NE-15) Neals Landing, FL (SSE-18) Dothan, AL (W-18)	PB-0215 PB-0718  PB-1218		
Community Stations: GA Pacific Paper Co. (SSE-3) Ashford, AL (WSW-8) Columbia, AL (N-5)	PC-0703  PC-1108  PC-1605		

TABLE 2-1 (SHEET 2 of 7)

## SUMMARY DESCRIPTION OF RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway with Sample Types and Locations (sector-miles)	Sample Identification	Sampling and Collection Frequency	Type and Frequency of Analysis
<u>Iodine</u>		Continuous sampler operation with sample collection weekly	Radioiodine canister: Analyze each sample for I-131 weekly.
Indicator Stations: River Intake Structure (ESE-0.8) South Perimeter (SSE-1.0) Plant Entrance (WSW-0.9) North Perimeter (N-0.8)	II-0501 II-0701 II-1101 II-1601		
Control Station: Blakely, GA (NE-15) Neals Landing, FL (SSE-18) Dothan, AL (W-18)	IB-0215 IB-0718 IB-1218		
Community Station: GA Pacific Paper Co. (SSE-3)	IC-0703		
<u>DIRECT RADIATION TLD</u>		Quarterly	Gamma dose: Read each badge quarterly
Indicator Stations: Plant Perimeter (NNE-0.9) (NE-1.0) (ENE-0.9) (E-0.8) (ESE-0.8)	RI-0101 RI-0201 RI-0301 RI-0401 RI-0501		

TABLE 2-1 (SHEET 3 of 7)

## SUMMARY DESCRIPTION OF RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway with Sample Types and Locations (sector-miles)	Sample Identification	Sampling and Collection Frequency	Type and Frequency of Analysis
(SE-1.1) (SSE-1.0) (S-1.0) (SSW-1.0) (SW-0.9) (WSW-0.9) (W-0.8) (WNW-0.8) (NW-1.1) (NNW-0.9) (N-0.8)	RI-0601 RI-0701 RI-0801 RI-0901 RI-1001 RI-1101 RI-1201 RI-1301 RI-1401 RI-1501 RI-1601		
Control Stations: Blakely, GA (NE-15) Neals Landing, FL (SSE-18) Dothan, AL (W-15) Dothan, AL (W-18) Webb, AL (WNW-11) Haleburg, AL (N-12)	RB-0215 RB-0718  RB-1215 RB-1218 RB-1311  RB-1612		
Community Station By sector (NNE-4) (NE-4) (ENE-4) (E-5) (ESE-5) (SE-5) (SSE-3)	RC-0104 RC-0204 RC-0304 RC-0405 RC-0505 RC-0605 RC-0703		

TABLE 2-1 (SHEET 4 of 7)

## SUMMARY DESCRIPTION OF RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway with Sample Types and Locations (sector-miles)	Sample Identification	Sampling and Collection Frequency	Type and Frequency of Analysis
(S-5) (SSW-4) (SW-5) (WSW-4) (W-4) (WNW-4) (NW-4) (NNW-4) (N-5)  Of Special Interest: Nearest Residence (SW-1.2) City of Ashford, AL (WSW-8.0)	RC-0805 RC-0904 RC-1005 RC-1104 RC-1204 RC-1304 RC-1404 RC-1504 RC-1605  RC-1001 RC-1108		
<u>WATERBORNE Surface Water</u>		Aliquots taken with proportional semi-continuous sampler, having a minimum sampling frequency not exceeding two hours, collected weekly for 4 week composites and quarterly composites	Gamma isotopic analysis of each 4 week composite sample. Tritium analysis for each quarterly composite.
Indicator Station: Paper Mill, (~3 miles downstream of plant discharge, RM 40)	WRI		
Control Station: Upstream of Andrews Lock and dam (~3 miles upstream of the plant intake, RM 47)	WRB		



TABLE 2-1 (SHEET 5 of 7)

## SUMMARY DESCRIPTION OF RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway with Sample Types and Locations (sector-miles)	Sample Identification	Sampling and Collection Frequency	Type and Frequency of Analysis
<u>Ground Water</u>		Grab sample quarterly	Gamma isotopic, I-131 and tritium analyses of each sample quarterly
Indicator Station: Paper Mill Well (SSE-4)	WGI-07		
Control Station: Whatley Residence Well (SW-1.2)	WGB-10		
<u>River Sediment</u>		Grab sample semiannually	Gamma isotopic analysis of each sample semiannually
Indicator Station: Downstream of plant discharge at Smith's Bend (RM 41) <sup>a</sup>	RSI		
Control Station: Upstream of plant discharge at Andrews Lock & Dam Reservoir (RM 48) <sup>a</sup>	RSB		
<u>INGESTION Milk</u>		Grab sample biweekly	Gamma isotopic and I-131 analyses of each sample biweekly
Control Station: Robert Weir Dairy Donaldsonville, GA (SSE - 14)	MB-0714		

TABLE 2-1 (SHEET 6 of 7)

## SUMMARY DESCRIPTION OF RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

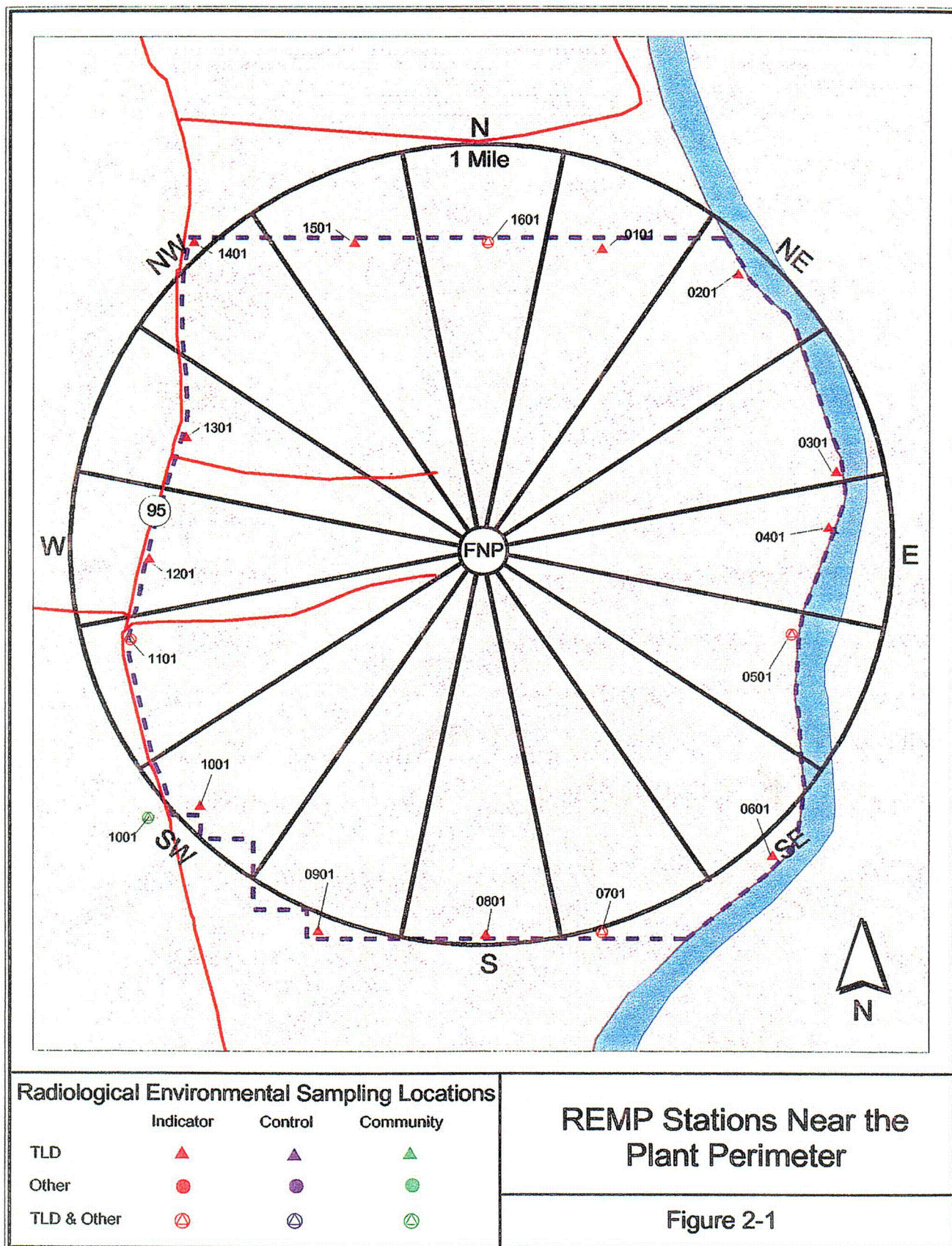
Exposure Pathway with Sample Types and Locations (sector-miles)	Sample Identification	Sampling and Collection Frequency	Type and Frequency of Analysis
<u>Fish</u>		Grab sample semiannually for Game Fish and Bottom Feeding Fish	Gamma isotopic analysis on the edible portions of each sample semiannually
Indicator Stations: Downstream of plant discharge in vicinity of Smith's Bend (RM 41) <sup>b</sup>	FGI & FBI		
Control Station: Upstream of plant discharge in Andrews Lock & Dam Reservoir (RM 48) <sup>b</sup>	FGB & FBB		
<u>Forage</u>		Grab sample from forage every 4 weeks.	Gamma isotopic analysis of each sample every 4 weeks.
Indicator Station: South Southeast Perimeter (SSE-1.0) North Perimeter (N-0.8)	FI-0701 FI-1601		
Control Station: Dothan, AL (W-18)	FB-1218		

**TABLE 2-1 (SHEET 7 of 7)**

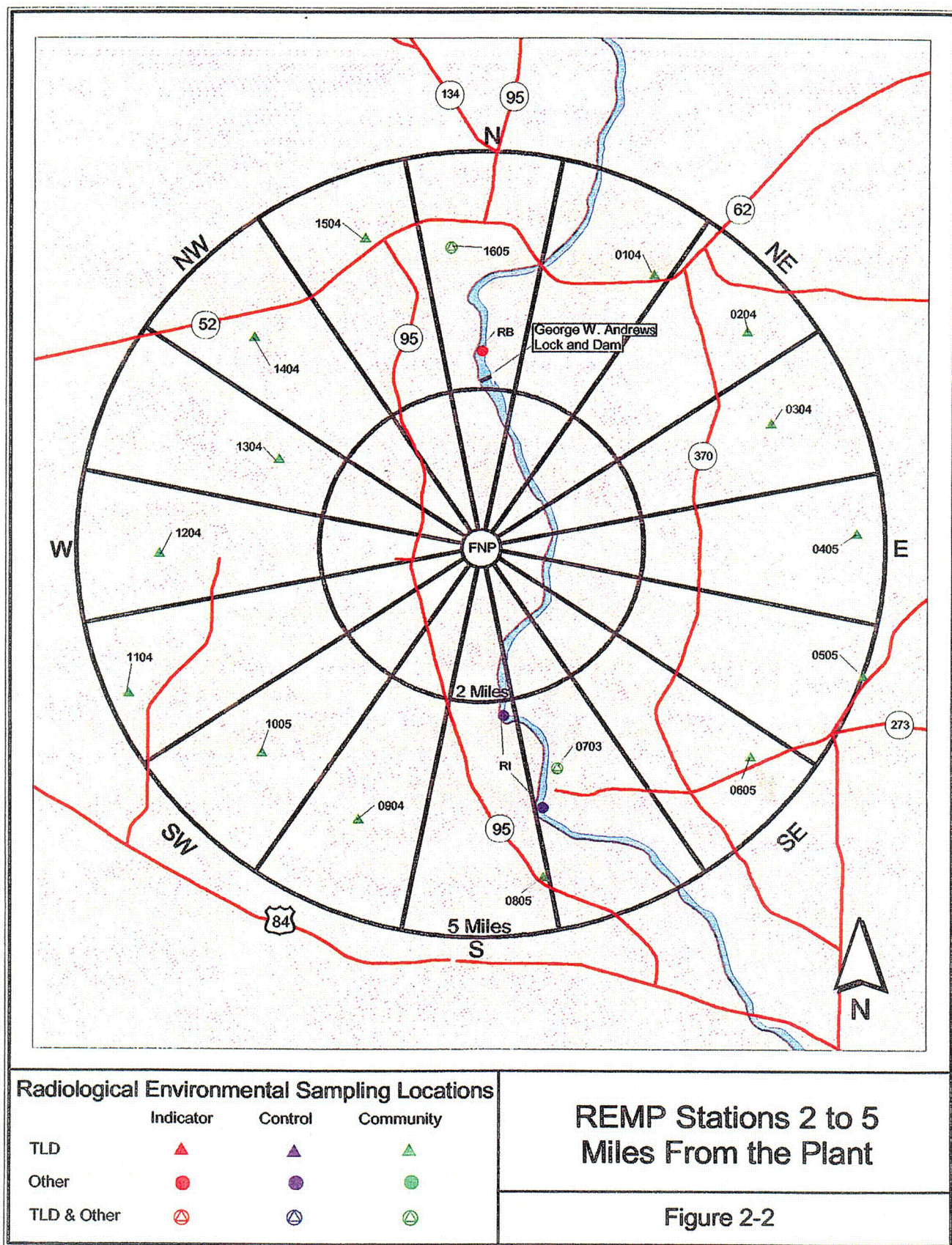
**SUMMARY DESCRIPTION OF RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM**

**NOTATIONS**

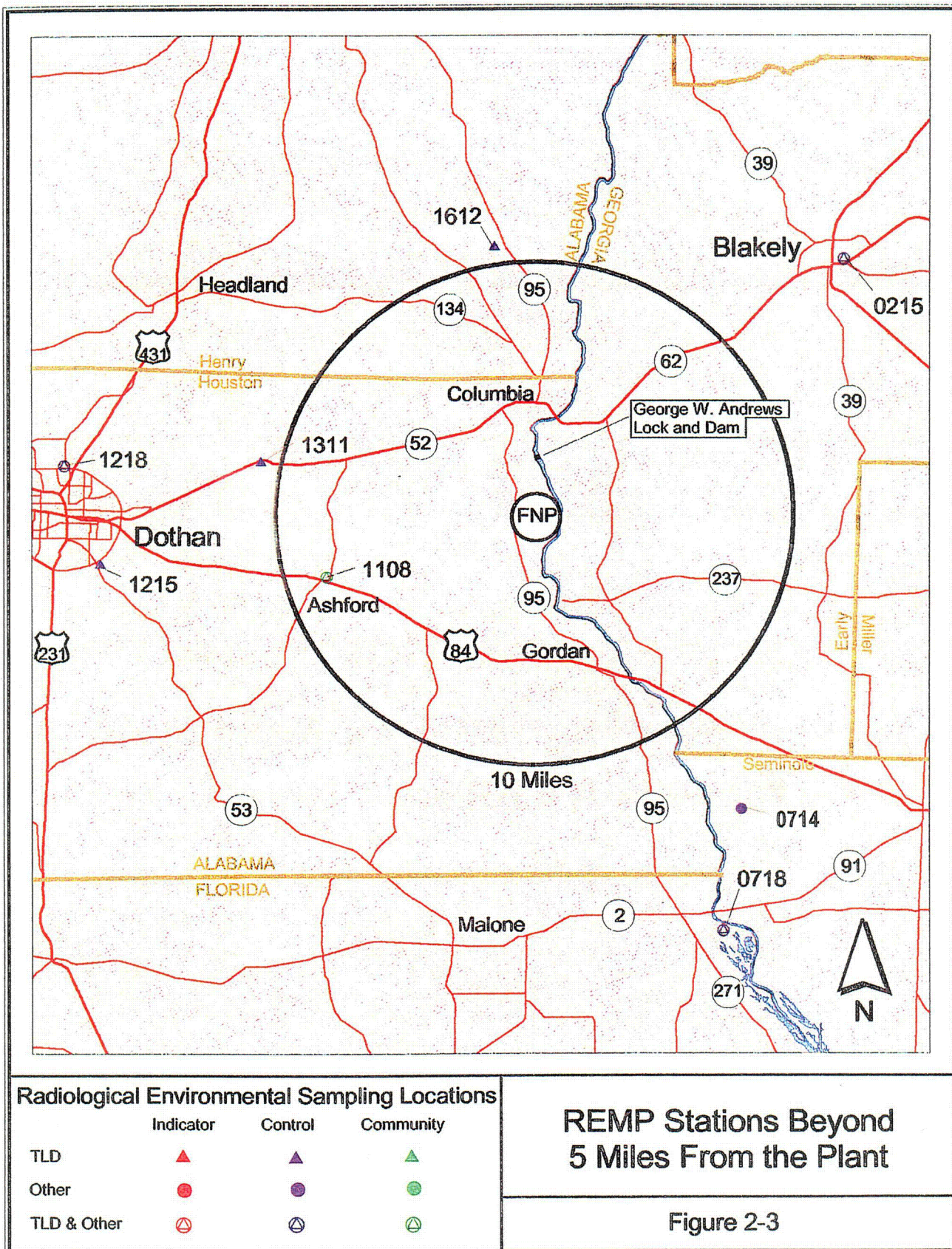
- a. These collections are normally made at river mile 41.3 for the indicator station and river mile 47.8 for the control station; however, due to river bottom sediment shifting caused by high flows, dredging, etc., collections may be made from river mile 40 to 42 for the indicator station and from river mile 47 to 49 for the control station.
- b. Since a few miles of river water may be needed to obtain adequate fish samples, these river mile positions represent the approximate locations about which the catches are taken. Collections for the indicator station should be from river mile 37.5 to 42.5 and for the control station from river mile 47 to 52.











### **3.0 RESULTS SUMMARY**

In accordance with ODCM 7.1.2.1, the summarized and tabulated results for all of the regular samples collected for the year at the designated indicator, community and control stations are presented in Table 3-1. The format of Table 3-1 is similar to Table 3 of the Nuclear Regulatory Commission (NRC) Branch Technical Position, "An Acceptable Radiological Environmental Monitoring Program" Revision 1, November 1979. Results for samples collected at locations other than those listed in Table 2-1 are discussed in Section 4 under the particular sample type.

As indicated in ODCM 7.1.2.1, the results for naturally-occurring radionuclides that are also found in plant effluents must be reported along with man-made radionuclides. Be-7, which occurs abundantly in nature, has been found in some years in the plant effluents. No other naturally occurring radionuclides have been found in effluents. Therefore, the only radionuclides of interest in the REMP are the man-made radionuclides and Be-7, when it is detected in the plant's liquid or gaseous effluents. During 2004, Be-7 was detected in Farley's liquid effluents.

TABLE 3-1 (SHEET 1 of 6)

## RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY

Farley Nuclear Plant, Docket Nos. 50-348 and 50-364

Houston County, Alabama

Medium or Pathway Sampled (Unit of Measurement)	Type and Total Number of Analyses Performed	Minimum Detectable Concentration (MDC) (a)	Indicator Locations Mean (b), Range (Fraction)	Indicator Location with the Highest Annual Mean		Community Locations Mean (b), Range (Fraction)	Control Locations Mean(b), Range (Fraction)
				Name Distance & Direction	Mean (b), Range (Fraction)		
Airborne Particulates (fCi/m3)	Gross Beta 517	10	22.0 6.6-63.2 (208/208)	North Perimeter 0.8 miles, N	23.4 8.9-51.8 (52/52)	22.4 6.3-53.5 (156/156)	21.3 5.7-69.2 (153/153)
	Gamma Isotopic 40 I-131	70	NDM(c) (0/16)	NA(d)		NDM (0/12)	NDM (0/12)
	Cs-134	50	NDM (0/16)	NA		NDM (0/12)	NDM (0/12)
	Cs-137	60	NDM (0/16)	NA		NDM (0/12)	NDM (0/12)
Airborne Radioiodine (fCi/m3)	I-131 413	70	NDM (0/208)	NA		NDM (0/52)	NDM (0/153)
Direct Radiation (mR/91 days)	Gamma Dose 157	NA	14.3 10.3-22.3 (64/64)	RI-0401 Plt. Perimeter 0.8 miles, E	20.9 19.7-22.3 (4/4)	12.1 9.5-15.0 (69/69)	12.9 10.0-16.6 (24/24)
Milk (pCi/l)	Gamma Isotopic 26 Cs-134	15	NA	NA		NA	NDM (0/26)
	Cs-137	18	NA	NA		NA	NDM (0/26)
	Ba-140	60	NA	NA		NA	NDM (0/26)
	La-140	15	NA	NA		NA	NDM (0/26)
	I-131 26	1	NA	NA		NA	NDM (0/26)



TABLE 3-1 (SHEET 2 of 6)

## RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY

Farley Nuclear Plant, Docket Nos. 50-348 and 50-364

Houston County, Alabama

Medium or Pathway Sampled (Unit of Measurement)	Type and Total Number of Analyses Performed	Minimum Detectable Concentration (MDC) (a)	Indicator Locations Mean (b), Range (Fraction)	Indicator Location with the Highest Annual Mean		Community Locations Mean (b), Range (Fraction)	Control Locations Mean(b), Range (Fraction)
				Name Distance & Direction	Mean (b), Range (Fraction)		
Forage (pCi/kg wet)	Gamma Isotopic 39 I-131	60	NDM (0/26)	NA		NA	NDM (0/13)
	Cs-134	60	NDM (0/26)	NA		NA	NDM (0/13)
	Cs-137	80	21.6 21.6-21.6 (1/26)	FI-1601 Plt. Perimeter 0.8 miles, N	21.6 21.6-21.6 (1/13)	NA	NDM (0/13)
Ground Water (pCi/l)	H-3 8	2000	194 194-194 (1/4)	Ga Pacific Paper Mill Well (SSE-4)	194 194-194 (1/4)	NA	271 (184-357) (2/4)
	I-131 8	1	NDM (0/4)	NA		NA	NDM (0/4)
	Gamma Isotopic 8 Mn-54	15	NDM (0/4)	NA		NA	NDM (0/4)
	Fe-59	30	NDM (0/4)	NA		NA	NDM (0/4)
	Co-58	15	NDM (0/4)	NA		NA	NDM (0/4)
	Co-60	15	NDM (0/4)	NA		NA	NDM (0/4)
	Zn-65	30	NDM (0/4)	NA		NA	NDM (0/4)
	Zr-95	30	NDM (0/4)	NA		NA	NDM (0/4)
	Nb-95	15	NDM (0/4)	NA		NA	NDM (0/4)

**TABLE 3-1 (SHEET 3 of 6)**

**RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY**

**Farley Nuclear Plant, Docket Nos. 50-348 and 50-364**

**Houston County, Alabama**

Medium or Pathway Sampled (Unit of Measurement)	Type and Total Number of Analyses Performed	Minimum Detectable Concentration (MDC) (a)	Indicator Locations Mean (b), Range (Fraction)	Indicator Location with the Highest Annual Mean		Community Locations Mean (b), Range (Fraction)	Control Locations Mean(b), Range (Fraction)
				Name Distance & Direction	Mean (b), Range (Fraction)		
	Cs-134	15	NDM (0/4)	NA		NA	NDM (0/4)
	Cs-137	18	NDM (0/4)	NA		NA	NDM (0/4)
	Ba-140	60	NDM (0/4)	NA		NA	NDM (0/4)
	La-140	15	NDM (0/4)	NA		NA	NDM (0/4)
Surface Water (pCi/l)	H-3 8	3000	270 230-320 (4/4)	Ga Pacific Paper Co. RM 40	270 230-320 (4/4)	NA	NDM (0/4)
	Gamma Isotopic 26						
	Be-7	124 (e)	NDM (0/13)	NA		NA	NDM (0/13)
	Mn-54	15	NDM (0/13)	NA		NA	NDM (0/13)
	Fe-59	30	NDM (0/13)	NA		NA	NDM (0/13)
	Co-58	15	NDM (0/13)	NA		NA	NDM (0/13)
	Co-60	15	NDM (0/13)	NA		NA	NDM (0/13)
	Zn-65	30	NDM (0/13)	NA		NA	NDM (0/13)
	Zr-95	30	NDM (0/13)	NA		NA	NDM (0/13)
	Nb-95	15	NDM (0/13)	NA		NA	NDM (0/13)

**TABLE 3-1 (SHEET 4 of 6)**

**RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY**

**Farley Nuclear Plant, Docket Nos. 50-348 and 50-364**

**Houston County, Alabama**

Medium or Pathway Sampled (Unit of Measurement)	Type and Total Number of Analyses Performed	Minimum Detectable Concentration (MDC) (a)	Indicator Locations Mean (b), Range (Fraction)	Indicator Location with the Highest Annual Mean		Community Locations Mean (b), Range (Fraction)	Control Locations Mean(b), Range (Fraction)
				Name Distance & Direction	Mean (b), Range (Fraction)		
	I-131	15 (f)	NDM (0/13)	NA		NA	NDM (0/13)
	Cs-134	15	NDM (0/13)	NA		NA	NDM (0/13)
	Cs-137	18	NDM (0/13)	NA		NA	NDM (0/13)
	Ba-140	60	NDM (0/13)	NA		NA	NDM (0/13)
	La-140	15	NDM (0/13)	NA		NA	NDM (0/13)
Bottom Feeding Fish (pCi/kg wet)	Gamma Isotopic 4						
	Be-7	655 (e)	NDM (0/2)	NA		NA	NDM (0/2)
	Mn-54	130	NDM (0/2)	NA		NA	NDM (0/2)
	Fe-59	260	NDM (0/2)	NA		NA	NDM (0/2)
	Co-58	130	NDM (0/2)	NA		NA	NDM (0/2)
	Co-60	130	NDM (0/2)	NA		NA	NDM (0/2)
	Zn-65	260	NDM (0/2)	NA		NA	NDM (0/2)
	Cs-134	130	NDM (0/2)	NA		NA	NDM (0/2)
	Cs-137	150	8.1 8.1-8.1 (1/2)	Downstream, near Smith's Bend (RM 41)		NA	NDM (0/2)

TABLE 3-1 (SHEET 5 of 6)

## RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY

Farley Nuclear Plant, Docket Nos. 50-348 and 50-364

Houston County, Alabama

Medium or Pathway Sampled (Unit of Measurement)	Type and Total Number of Analyses Performed	Minimum Detectable Concentration (MDC) (a)	Indicator Locations Mean (b), Range (Fraction)	Indicator Location with the Highest Annual Mean		Community Locations Mean (b), Range (Fraction)	Control Locations Mean(b), Range (Fraction)
				Name Distance & Direction	Mean (b), Range (Fraction)		
Game Fish (pCi/kg wet)	Gamma Isotopic 4						
	Be-7	655 (e)	NDM (0/2)	NA		NA	NDM (0/2)
	Mn-54	130	NDM (0/2)	NA		NA	NDM (0/2)
	Fe-59	260	NDM (0/2)	NA		NA	NDM (0/2)
	Co-58	130	NDM (0/2)	NA		NA	NDM (0/2)
	Co-60	130	NDM (0/2)	NA		NA	NDM (0/2)
	Zn-65	260	NDM (0/2)	NA		NA	NDM (0/2)
	Cs-134	130	NDM (0/2)	NA		NA	NDM (0/2)
	Cs-137	150	12.7 10.8-14.6 (2/2)	Downstream, near Smith's Bend (RM 41)		NA	10.8 10.8-10.8 (1/2)
River Shoreline Sediment (pCi/kg dry)	Gamma Isotopic 4						
	Be-7	655 (e)	NDM (0/2)	NA		NA	NDM (0/2)
	Cs-134	150	NDM (0/2)	NA		NA	NDM (0/2)
	Cs-137	180	NDM (0/2)	NA		NA	NDM (0/2)

**TABLE 3-1 (SHEET 6 of 6)**

**RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM ANNUAL SUMMARY**

**Farley Nuclear Plant, Docket Nos. 50-348 and 50-364**

**Houston County, Alabama**

**NOTATIONS**

- a. The MDC is defined in ODCM 10.1. Except as noted otherwise, the values listed in this column are the detection capabilities required by ODCM Table 4-3 (Table 4-1 of this report). The values listed in this column are a priori (before the fact) MDCs. In practice, the a posteriori (after the fact) MDCs are generally lower than the values listed. Any a posteriori MDC greater than the value listed in this column is discussed in Section 4.
- b. Mean and range are based upon detectable measurements only. The fraction of all measurements at a specified location that are detectable is placed in parentheses.
- c. No Detectable Measurement(s).
- d. Not Applicable.
- e. The EL has determined that this value may be routinely attained under normal conditions. No value is provided in Table 4-1 of this report.
- f. If a drinking water pathway exists, a value of 1 pCi/l would be used. See note b of Table 4-1 of this report.

## 4.0 DISCUSSION OF RESULTS

Included in this section are evaluations of the laboratory results for the various sample types. Comparisons were made between the difference in mean values for pairs of station groups (e.g., indicator and control stations, or, community and control stations) and the calculated Minimum Detectable Difference (MDD) between these pairs, at the 99% Confidence Level (CL). The MDD was determined using the standard Student's t-test. A difference in the mean values which was less than the MDD was considered to be statistically indiscernible.

The 2004 results were compared with past results, including those obtained during preoperation. As appropriate, results were compared with their Minimum Detectable Concentrations (MDC) and Reporting Levels (RL) which are listed in Tables 4-1 and 4-2 of this report, respectively. The required MDCs were achieved during laboratory sample analysis. Any anomalous results are explained within this report.

Results of interest are graphed to show historical trends. The data points are tabulated and included in this report. The points plotted and provided in the tables represent mean values of only detectable results. Periods for which no detectable measurements (NDM) were observed, or periods for which values were not applicable (e.g., milk indicator, etc.), are plotted as and listed in the tables as 0's.

**Table 4-1**  
**Minimum Detectable Concentrations (MDC)**

Analysis	Water (pCi/l)	Airborne Particulate or Gases (fCi/m <sup>3</sup> )	Fish (pCi/kg) wet	Milk (pCi/l)	Grass or Leafy Vegetation (pCi/kg) wet	Sediment (pCi/kg) dry
Gross Beta	4	10				
H-3	2000 (a)					
Mn-54	15		130			
Fe-59	30		260			
Co-58	15		130			
Co-60	15		130			
Zn-65	30		260			
Zr-95	30					
Nb-95	15					
I-131	1 (b)	70		1	60	
Cs-134	15	50	130	15	60	150
Cs-137	18	60	150	18	80	180
Ba-140	60			60		
La-140	15			15		

(a) If no drinking water pathway exists, a value of 3000 pCi/l may be used.

(b) If no drinking water pathway exists, a value of 15 pCi/l may be used.

**Table 4-2**  
**Reporting Levels (RL)**

Analysis	Water (pCi/l)	Airborne Particulate or Gases (fCi/m <sup>3</sup> )	Fish (pCi/kg) wet	Milk (pCi/l)	Grass or Leafy Vegetation (pCi/kg) wet
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		
Zn-65	300		20,000		
Zr-95	400				
Nb-95	700				
I-131	2 (b)	900		3	100
Cs-134	30	10,000	1000	60	1000
Cs-137	50	20,000	2000	70	2000
Ba-140	200			300	
La-140	100			400	

(a) This is the 40 CFR 141 value for drinking water samples. If no drinking water pathway exists, a value of 30,000 may be used.

(b) If no drinking water pathway exists, a value of 20 pCi/l may be used.

Atmospheric nuclear weapons tests from the mid 1940's through 1980 distributed man-made nuclides around the world. The most recent atmospheric tests in the 1970's and in 1980 had a significant impact upon the radiological concentrations found in the environment prior to and during preoperation, and the earlier years of operation. Some long-lived radionuclides, such as Cs-137, continue to have some impact.

Significant upward trends also followed the Chernobyl incident, which began on April 26, 1986.

In accordance with ODCM 4.1.1.2.1, deviations from the required sampling schedule are permitted if samples are unobtainable due to hazardous conditions, unavailability, inclement weather, equipment malfunction or other just reasons. Deviations from conducting the REMP as described in Table 2-1 are summarized in Table 4-3 along with their causes and resolutions.

All results were tested for conformance with Chauvenet's criterion (G. D. Chase and J. L. Rabinowitz, Principles of Radioisotope Methodology, Burgess Publishing Company, 1962, pages 87-90) to identify values which differed from the mean of a set by a statistically significant amount. Identified outliers were investigated to determine the reason(s) for the variation. If equipment malfunction or other valid physical reasons were identified as causing the variation, the anomalous result was excluded from the data set as non-representative. No data were excluded exclusively for failing Chauvenet's criterion. Data exclusions are discussed in this section under the appropriate sample type.



TABLE 4-3 (SHEET 1 of 2)

## DEVIATIONS FROM RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

<b>COLLECTION PERIOD</b>	<b>AFFECTED SAMPLE(S)</b>	<b>DEVIATION</b>	<b>CAUSE</b>	<b>RESOLUTION</b>
12/09/03-01/06/04 CR 2003003465	WRB	River water sampler missed approximately 48 aliquots which resulted in a nonrepresentative sample.	River water sampler discovered in "standby" mode.	Manual sample was pulled. Sampler place in "automatic" and proper operation verified.
02/03/04-02/10/04 CR 2004000564	PB-0718 and IB-0718	Air sample was not continuously collected throughout sample period.	Loss of power to sample pump due to blown fuse.	Fuse and sample pump were replaced and sampler returned to service.
1 <sup>st</sup> Quarter 2004 CR 2004000760	TLD RC-0605	Direct radiation exposure results for the first half of the first quarter were not obtained.	TLDs were missing at mid-quarter inspection.	Replaced TLDs at mid-quarter.
1 <sup>st</sup> Quarter 2004 CR 2004001541	TLD RC-0304	Direct radiation exposure results for the first quarter were not obtained.	TLDs were missing at end of quarter.	Replaced TLDs.
4/27/04-05/25/04 CR 2004001997	WRB	River water sampler missed approximately 1 aliquot.	River water sampler supply line found clogged with debris after routine maintenance performed on sampler.	Sample line was unclogged and sampler returned to service.
06/01/04-06/08/04 CR 2004100113	PC-0703 and IC-0703	Air sample time lower than expected. Air sample was not continuously collected throughout sample period.	Power interruption to air station.	Georgia Pacific contacted but had no noted power problems. Sampler resumed operation when power was restored.
06/22/04-06/29/04 CR 2004100769	PB-0718 and IB-0718	Air sample was not continuously collected throughout sample period.	Loss of power to sample pump due to blown fuse.	Fuse was replaced and sample pump returned to service.

**TABLE 4-3 (SHEET 2 of 2)**

**DEVIATIONS FROM RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM**

<b>COLLECTION PERIOD</b>	<b>AFFECTED SAMPLE(S)</b>	<b>DEVIATION</b>	<b>CAUSE</b>	<b>RESOLUTION</b>
2 <sup>nd</sup> Quarter 2004 CR 2004100853	TLD RC-1104	Direct radiation exposure results for the second quarter were not obtained.	TLDs were missing at end of quarter.	Replaced TLDs.
07/13/04-07/20/04 CR 2004101244	PI-1601 and II-1601	Air sample was not continuously collected throughout sample period.	Loss of power to air station during thunderstorm.	Power supply to station restored.
07/13/04-07/20/04 CR 2004101364	PI-0701 and II-0701	Air sample was not continuously collected throughout sample period. Time short approximately 8 hours.	Power interruption to air station during thunderstorm.	Sampler resumed operation when power was restored.
07/13/04-07/20/04 CR 2004101364	PB-0718 and IB-0718	Air sample was not continuously collected throughout sample period.	Power interruption to air station during thunderstorm. Fuse blown	Fuse was replaced and sample pump returned to service.
08/24/04-08/31/04 CR 2004102522	PB-0718 and IB-0718	Air sample was not continuously collected throughout sample period.	Sample pump failure.	Sample pump replaced and sampler returned to service.
09/07/04-09/14/04 CR 2004102956	PB-0718 and IB-0718	Air sample was not continuously collected throughout sample period.	Loss of power to sample pump due to blown fuse.	Fuse was replaced and sample pump returned to service.
10/19/04-10/26/04 CR 2004104546	PI-1601 and II-1601	Air sample was not continuously collected throughout sample period. Time short approximately 1 hour.	Portable generator set up for use during bus swap. Generator failed to supply adequate power to run sampler.	Generator repaired and sample station returned to service.

## 4.1 Land Use Census

In accordance with ODCM 4.1.2, a land use census was conducted during the month of June, 2004. The land use census is used to determine the locations of the nearest permanent residence and milk animal in each of the 16 compass sectors within a distance of 5 miles. A milk animal is a cow or goat producing milk for human consumption. The 2004 survey revealed no changes from the 2003 survey. No milk animals were found within a 5 mile distance. The census results are tabulated in Table 4.1-1.

**Table 4.1-1**

### **LAND USE CENSUS RESULTS**

#### **Distance in Miles to the Nearest Location in Each Sector**

<b>SECTOR</b>	<b>RESIDENCE</b>	<b>MILK ANIMAL</b>
N	2.6	none
NNE	2.5	none
NE	2.4	none
ENE	2.4	none
E	2.8	none
ESE	3.0	none
SE	3.4	none
SSE	none	none
S	4.3	none
SSW	2.9	none
SW	1.2	none
WSW	2.4	none
W	1.3	none
WNW	2.1	none
NW	1.5	none
NNW	2.0	none

The Houston County, Alabama and the Early County, Georgia Extension Agents were contacted for assistance in locating commercial dairy farms and privately owned milk animals within 5 miles of the plant. A list of commercial dairy farms in Houston County was provided; there are no commercial dairy farms in Early County. Neither agent knew of privately owned milk animals within 5 miles of FNP. In addition, field surveys were conducted in the plant vicinity along the state and county highways and the interconnecting secondary roads. No milk animals were found within 5 miles of the plant.

ODCM 4.1.2.2.1 requires a new controlling receptor to be determined, if the land use census identifies a location that yields a calculated receptor dose greater than the one in current use. Neither current sampling locations nor the controlling receptor were affected by the 2004 land use census results. The current controlling receptor as described in ODCM Table 3-7 remains a child in the SW Sector at 1.2 miles.

## 4.2 Airborne

As specified in Table 2-1 and shown in Figures 4.2-1 and 4.2-2, airborne particulate filters and charcoal canisters are collected weekly at 4 indicator, 3 control and 3 community stations. Particulate filters are collected at all of the stations while the charcoal canisters are collected at all but 2 of the community stations. At each location, air is continuously drawn through a glass fiber filter to retain airborne particulates and, as appropriate, an activated charcoal canister is placed in series to adsorb radioiodine.

Each particulate filter is counted for gross beta activity. A quarterly gamma isotopic analysis is performed on a composite of the air particulate filters for each station. Each charcoal canister is analyzed for I-131.

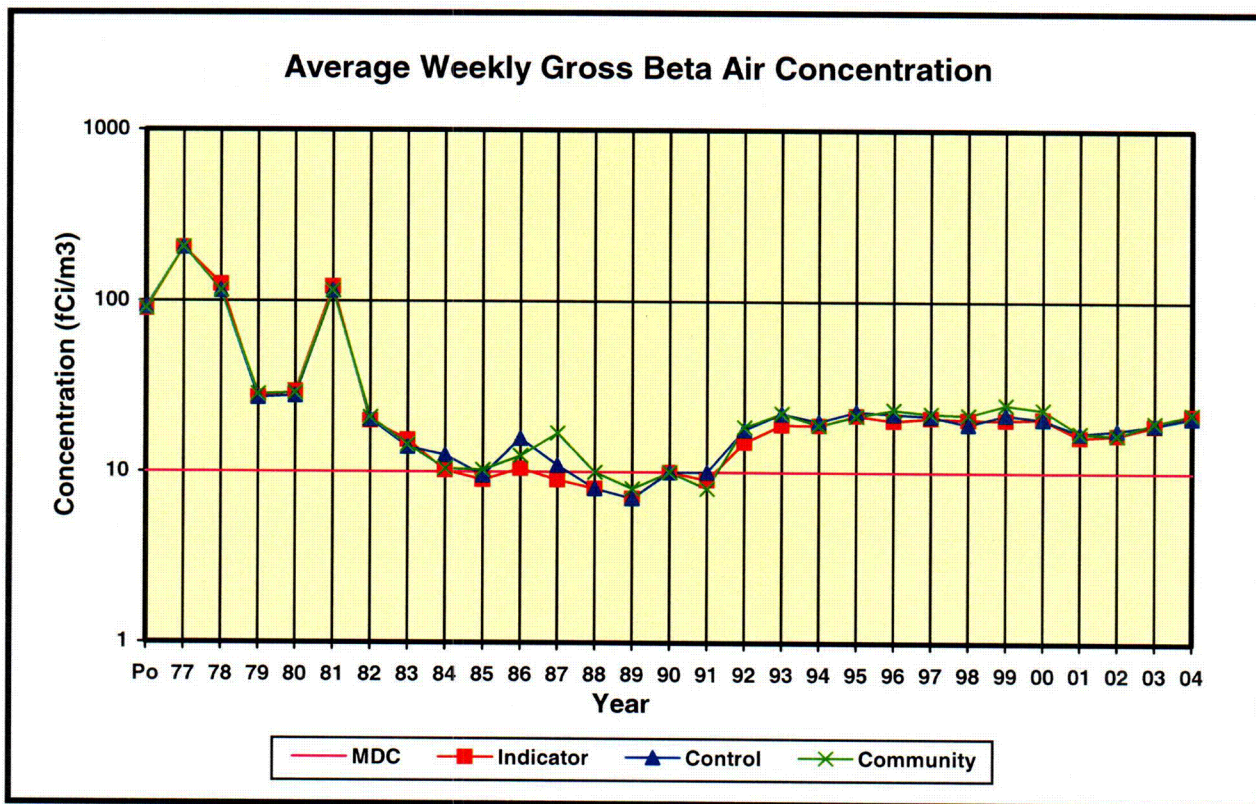
As provided in Table 3-1, the 2004 annual average weekly gross beta activity was 22.0 fCi/m<sup>3</sup> at the indicator stations and 21.3 fCi/m<sup>3</sup> at the control stations. However, the difference of 0.7 fCi/m<sup>3</sup> between the two averages is not statistically discernible since the MDD for these two average values is 2.52 fCi/m<sup>3</sup>.

As shown in Table 3-1, the 2004 annual average weekly gross beta concentration was 22.4 fCi/m<sup>3</sup> at community stations. Although the community stations average was 1.1 fCi/m<sup>3</sup> greater than the average for the control stations, the difference is not statistically discernible since it is less than the MDD of 2.61 fCi/m<sup>3</sup> between the two averages.

Due to the weapons tests during preoperation and the early years of operation, the average gross beta concentrations were 5 to 10 times greater than those currently being measured. By the mid 1980s, the readings had diminished to about half the current levels. These annual averages approximately doubled as a consequence of the Chernobyl incident in 1986; this impact faded away in approximately 2 years. The installation of new air monitoring equipment in 1992 yielded an approximate factor of 2 increase in the readings. Since then, the levels have been fairly flat.

The historical trending of the average weekly gross beta air concentrations for each year of operation and the preoperational period at the indicator, control and community stations is plotted in Figure 4.2-1 and listed in Table 4.2-1. In general, there is close agreement between the results for the indicator, control and community stations. This close agreement supports the position that the plant's contribution to gross beta concentration in air is insignificant.

Figure 4.2-1



C-04

**Table 4.2-1**  
**Average Weekly Gross Beta Air Concentration**

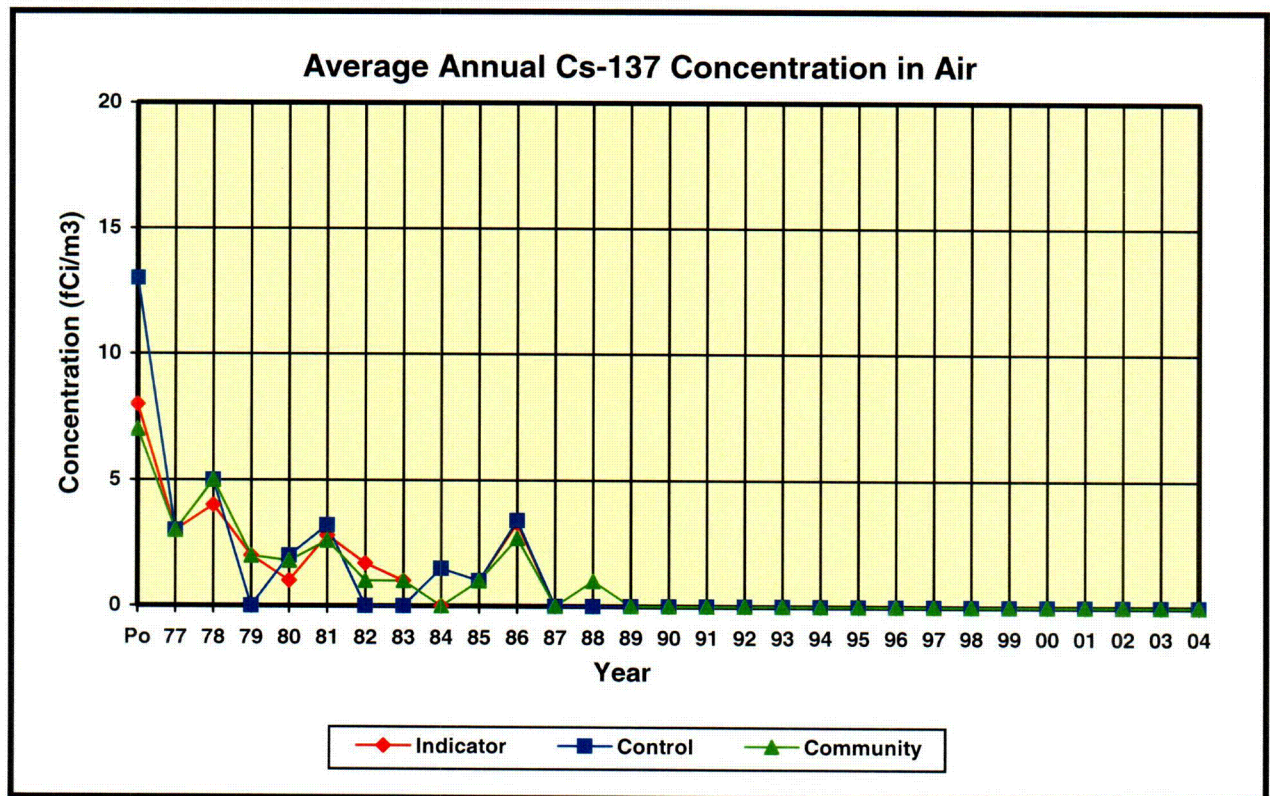
<b>Period</b>	<b>Indicator (fCi/m3)</b>	<b>Control (fCi/m3)</b>	<b>Community (fCi/m3)</b>
Pre-op	90	92	91
1977	205	206	206
1978	125	115	115
1979	27.3	27.3	28.7
1980	29.7	28.1	29.2
1981	121	115	115
1982	20.0	20.4	21.0
1983	15.5	14.1	14.5
1984	10.2	12.6	10.5
1985	9.0	9.6	10.3
1986	10.5	15.8	12.5
1987	9.0	11.0	17.0
1988	8.0	8.0	10.0
1989	7.0	7.0	8.0
1990	10.0	10.0	10.0
1991	9.0	10.0	8.0
1992	15.0	17.9	18.5
1993	19.1	22.3	22.4
1994	19.0	20.0	19.0
1995	21.7	22.9	21.6
1996	20.3	22.3	23.5
1997	21.1	21.6	22.4
1998	20.6	19.3	22.0
1999	20.5	22.1	25.2
2000	20.9	20.8	23.6
2001	16.3	17.2	17.3
2002	16.8	18.0	16.8
2003	19.1	19.3	19.9
2004	22.0	21.3	22.4



During 2004, no man-made radionuclides were detected from the gamma isotopic analysis of the quarterly composites of the air particulate filters. This has generally been the case since the impact of the weapons tests and the Chernobyl incident have faded. During preoperation and the early years of operation, a number of fission and activation products were detected. During preoperation, the average levels for Cs-134 and Cs-137 were 22 and 9 fCi/m<sup>3</sup>, respectively. In 1986, as a consequence of the Chernobyl incident, Cs-134 and Cs-137 levels of 3 to 4 fCi/m<sup>3</sup> were found. The MDC and RL for Cs-134 are 50 and 10,000 fCi/m<sup>3</sup> and the MDC and RL for Cs-137 are 60 and 20,000 fCi/m<sup>3</sup> respectively.

The historical trending of the annual detectable Cs-137 concentrations for the indicator, control and community stations is provided in Figure 4.2-2 and Table 4.2-2. The trend has been generally downward since preoperation and no positive results have been observed since 1988.

**Figure 4.2-2**



c-05

**Table 4.2-2**  
**Average Annual Cs-137 Concentration in Air**

<b>Period</b>	<b>Indicator (fCi/m3)</b>	<b>Control (fCi/m3)</b>	<b>Community (fCi/m3)</b>
Pre-op	8	13	7
1977	3.0	3.0	3.0
1978	4.0	5.0	5.0
1979	2.0	0	2.0
1980	1.0	2.0	1.8
1981	2.8	3.2	2.6
1982	1.7	0	1.0
1983	1.0	0	1.0
1984	0	1.5	0
1985	1.0	1.0	1.0
1986	3.3	3.4	2.7
1987	0	0	0
1988	0	0	1
1989	0	0	0
1990	0	0	0
1991	0	0	0
1992	0	0	0
1993	0	0	0
1994	0	0	0
1995	0	0	0
1996	0	0	0
1997	0	0	0
1998	0	0	0
1999	0	0	0
2000	0	0	0
2001	0	0	0
2002	0	0	0
2003	0	0	0
2004	0	0	0



Airborne I-131 was not detected in the charcoal canisters during 2004. In 1978, levels between 40 and 50 fCi/m<sup>3</sup> were found in a few samples and attributed to the Chinese weapons tests; then after the Chernobyl incident, levels up to a few hundred fCi/m<sup>3</sup> were found in some samples. At no other times has airborne I-131 been detected in the environmental samples. The MDC and RL for airborne I-131 are 70 and 900 fCi/m<sup>3</sup> respectively.

Table 4-3 lists REMP deviations that occurred during 2004. Not all of the deviations listed in Table 4-3 required data to be excluded from the calculation of the mean values. For air samples, three air filter sample results and three air charcoal sample results were excluded for failing Chauvenet's Criterion following equipment malfunctions:

For the periods 6/22 – 6/29, 7/13 – 7/20, and 9/7 – 9/14, Station 0718 experienced short run times. In each event, the sampler lost power due to a blown fuse.

## 4.3 Direct Radiation

Direct (external) radiation is measured with thermoluminescent dosimeters (TLDs). Two Panasonic UD-814 TLD badges are placed at each station. Each badge contains three phosphors composed of calcium sulfate crystals (with thulium impurity). The gamma dose at each station is based upon the average readings of the phosphors from the two badges. The two badges for each station are placed in thin plastic bags for protection from moisture while in the field. The badges are nominally exposed for periods of a quarter of a year (91 days). An inspection is performed near mid-quarter to assure that all badges are on-station and to replace any missing or damaged badges.

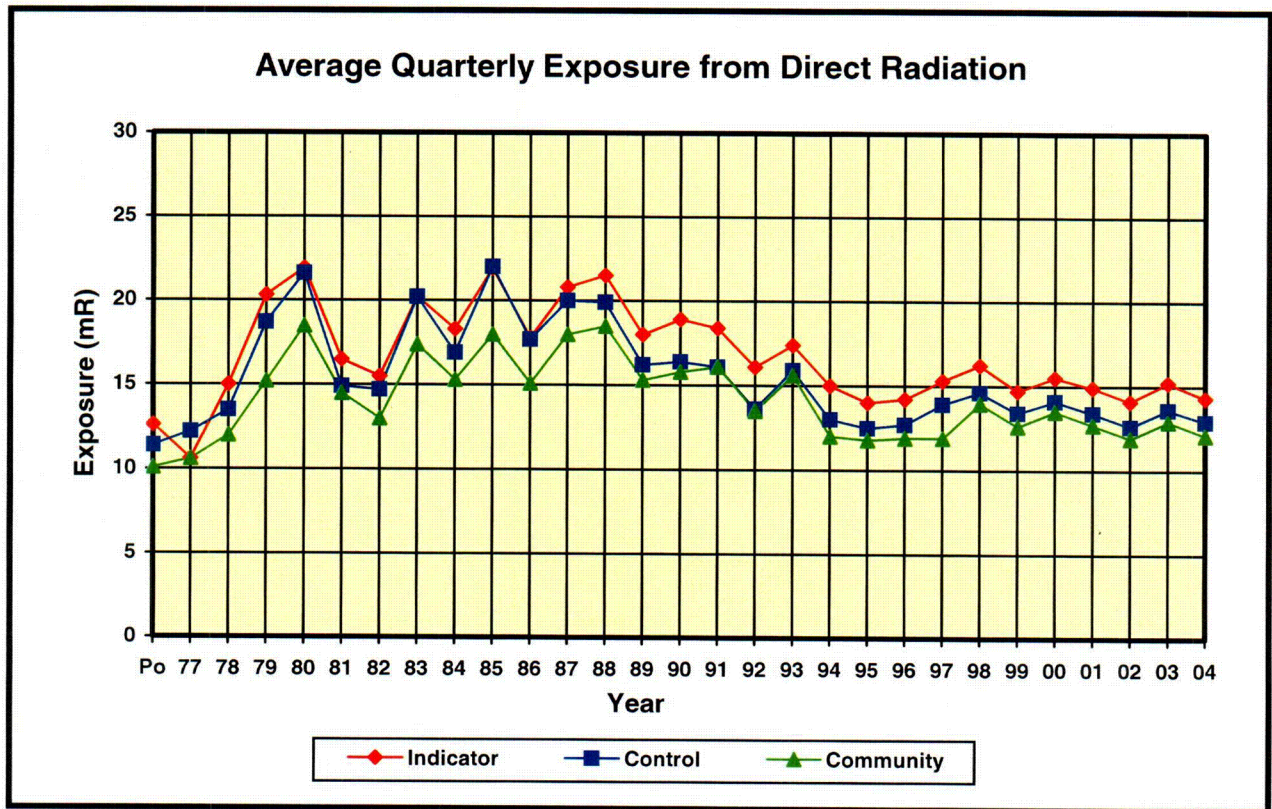
Two TLD stations are established in each of the 16 sectors, to form 2 concentric rings. The inner ring stations are located near the plant perimeter, as shown in Figure 2-1, and the outer ring stations are located at distances of approximately 3 to 5 miles from the plant, as shown in Figure 2-2. The stations forming the inner ring are designated as the indicator stations. The 6 control stations are located at distances greater than 10 miles from the plant, as shown in Figure 2-3. Stations are also provided which monitor special interest areas: the nearest occupied residence (SW at 1.2 miles), as shown in Figure 2-1, and the city of Ashford (WSW at 8 miles), as shown in Figure 2-3. The 16 outer ring stations and the 2 special interest stations are designated as community stations.

As provided in Table 3-1, the average quarterly exposure measured at the indicator stations (inner ring) during 2004 was 14.29 mR which was 1.35 mR greater than the 12.94 mR which was acquired at the control stations. This difference is less than the MDD of 1.40 mR and is therefore not statistically discernible. The difference of 0.8 mR found between the control stations (12.9 mR) and community stations (12.1 mR) is not statistically discernible since the difference is less than the MDD of 0.82 mR.

The historical trending of the average quarterly exposures in units of mR at the indicator, control and community locations are plotted in Figure 4.3-1 and listed in Table 4.3-1. During preoperation the average exposure at the indicator stations was 1.2 mR greater than that for the control stations, but the average over the entire period of operation was only 1.1 mR greater. During preoperation, the average exposure at the control stations was 1.3 mR greater than that at the community stations and the average over the period of operation is 1.5 mR greater. This supports the position that the plant is not contributing significantly to direct radiation in the environment.

Table 4-3 lists the REMP program deviations that occurred in 2004. There were three deviations involving TLDs in 2004. All three lead to loss of direct radiation data. During the first quarter, the TLDs at Station RC-0605 were missing at mid-quarter inspection and were replaced at mid-quarter. The replacement badges failed Chauvenet's Criterion and the results were excluded from the data base. The TLDs at RC-0304 were missing at the end of the first quarter resulting in no direct radiation data for that quarter. The TLDs at RC-1104 were missing at the end of the second quarter resulting in no direction radiation data for that quarter.

Figure 4.3-1



C-06

**Table 4.3-1****Average Quarterly Exposure from Direct Radiation**

<b>Period</b>	<b>Indicator (mR)</b>	<b>Control (mR)</b>	<b>Community (mR)</b>
Pre-op	12.6	11.4	10.1
1977	10.6	12.2	10.6
1978	15.0	13.5	12.0
1979	20.3	18.7	15.2
1980	21.9	21.6	18.5
1981	16.5	14.9	14.5
1982	15.5	14.7	13.0
1983	20.2	20.2	17.4
1984	18.3	16.9	15.3
1985	21.9	22.0	18.0
1986	17.8	17.7	15.1
1987	20.8	20.0	18.0
1988	21.5	19.9	18.5
1989	18.0	16.2	15.3
1990	18.9	16.4	15.8
1991	18.4	16.1	16.1
1992	16.1	13.6	13.5
1993	17.4	15.9	15.6
1994	15.0	13.0	12.0
1995	14.0	12.5	11.8
1996	14.2	12.7	11.9
1997	15.3	13.9	11.9
1998	16.2	14.6	13.9
1999	14.7	13.4	12.6
2000	15.5	14.1	13.5
2001	14.9	13.4	12.7
2002	14.1	12.6	11.9
2003	15.2	13.6	12.9
2004	14.3	12.9	12.1

The standard deviation for the quarterly result for each badge was subjected to a self imposed limit of 1.4. This limit is calculated using a method developed by the American Society for Testing and Materials (ASTM) (ASTM Special Technical Publication 15D, ASTM Manual on Presentation of Data and Control Chart Analysis, Fourth Revision, Philadelphia, PA, October 1976). The calculation is based upon the standard deviations obtained by the EL with the Panasonic UD-814 badges during 1992. This limit serves as a flag to initiate an investigation. To be conservative, readings with a standard deviation greater than 1.4 are excluded since the high standard deviation is interpreted as an indication of unacceptable variation in TLD response.

The TLD results from the following stations were excluded from the data set because their standard deviations were greater than 1.4:

Quarter 1 – RB-0718A, RC-0405A, RC-1005B, and RC-1304A  
Quarter 2 - None  
Quarter 3 - None  
Quarter 4 – RB-0718A

For the five TLD stations where these badges were located, only the reading of the companion badge was used to determine the quarterly exposure for the station.

The affected badges were visually inspected under a microscope and the glow curve and test results for the anneal data and the element correction factors were reviewed. No reason was found for the high standard deviations.

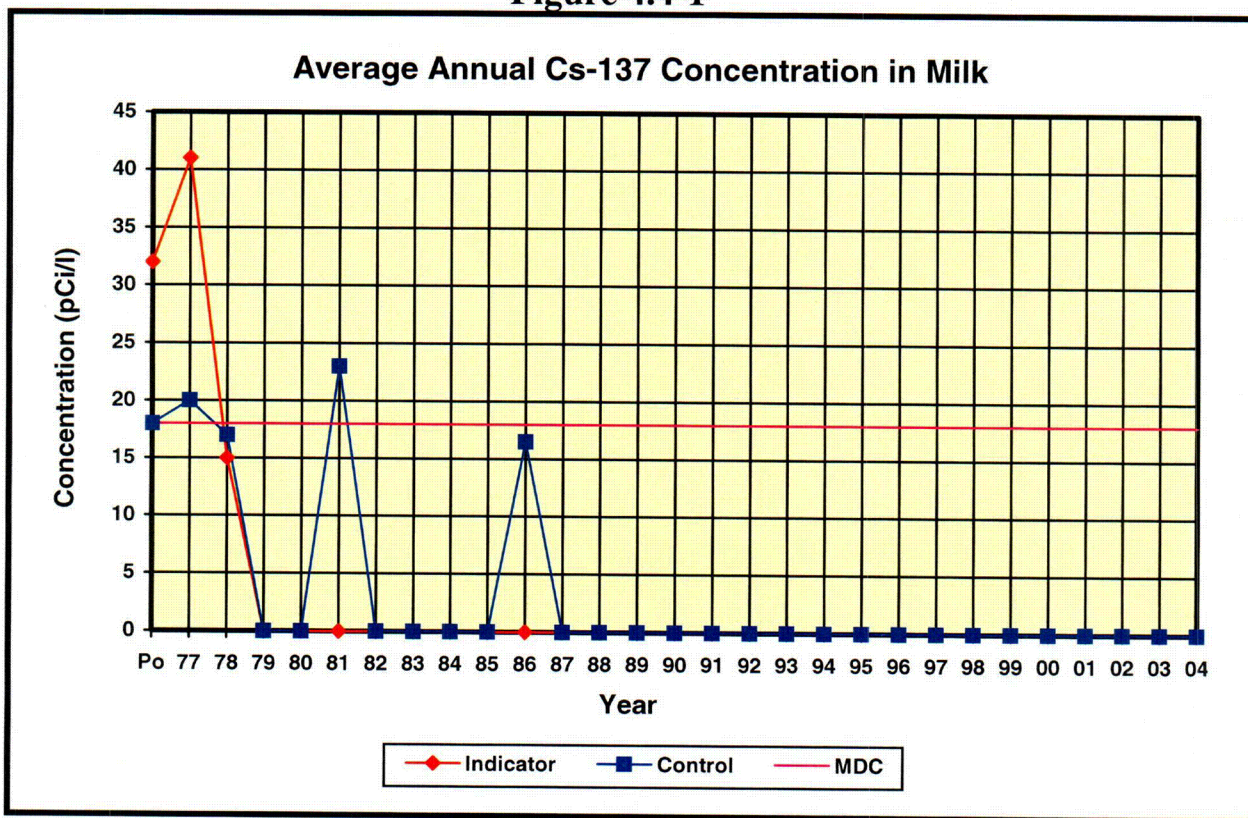


## 4.4 Milk

In accordance with Table 2-1, milk samples are collected biweekly from a control location. No indicator station (a location within five miles of the plant) has been available for milk sampling since 1987. As discussed in Section 4.0, no milk animals were found within five miles of the plant during the 2004 land use census.

Gamma isotopic analyses were performed on each sample as specified in Table 2-1. No man-made radionuclides were identified from the gamma isotopic analysis of the milk samples during 2004. The MDC and RL for Cs-137 in milk are 18 and 70 pCi/l, respectively. The historical trending of the average annual detectable Cs-137 concentration in milk samples is shown in Figure 4.4-1 and Table 4.4-1. Cs-137 has not been detected in milk since 1986. Its presence at that time is attributed to the Chernobyl incident. The earlier detectable results were attributed to the weapons tests.

Figure 4.4-1



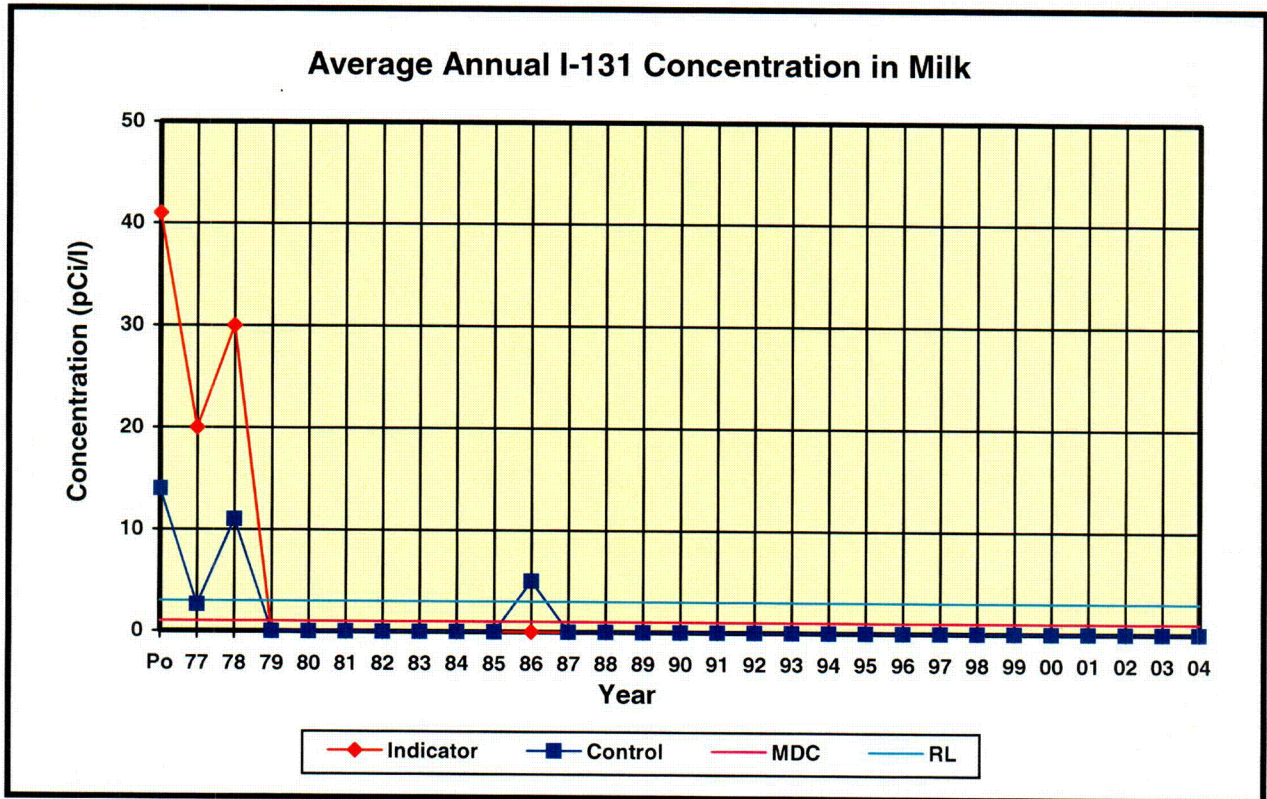
C-07

**Table 4.4-1**  
**Average Annual Cs-137 Concentration in Milk**

<b>Period</b>	<b>Indicator (pCi/l)</b>	<b>Control (pCi/l)</b>
Pre-op	32	18
1977	41	20
1978	15	17
1979	0	0
1980	0	0
1981	0	23.0
1982	0	0
1983	0	0
1984	0	0
1985	0	0
1986	0	16.5
1987	0	0
1988	0	0
1989	0	0
1990	0	0
1991	0	0
1992	0	0
1993	0	0
1994	0	0
1995	0	0
1996	0	0
1997	0	0
1998	0	0
1999	0	0
2000	0	0
2001	0	0
2002	0	0
2003	0	0
2004	0	0

As specified in Table 2-1, each sample was analyzed for I-131, which has not been detected in milk since 1986. The presence of I-131 at that time is attributed to the Chernobyl incident. The earlier detectable results were attributed to the weapons tests. The MDC and RL for I-131 are 1 and 3 pCi/l, respectively. Figure 4.4-2 and Table 4.4-2 show the historical trending of the average annual detectable I-131 concentration in milk samples.

Figure 4.4-2



C-08



**Table 4.4-2****Average Annual I-131 Concentration in Milk**

<b>Period</b>	<b>Indicator (pCi/l)</b>	<b>Control (pCi/l)</b>
Pre-op	41	14
1977	20	2.6
1978	30	11
1979	0	0
1980	0	0
1981	0	0
1982	0	0
1983	0	0
1984	0	0
1985	0	0
1986	0	5.0
1987	0	0
1988	0	0
1989	0	0
1990	0	0
1991	0	0
1992	0	0
1993	0	0
1994	0	0
1995	0	0
1996	0	0
1997	0	0
1998	0	0
1999	0	0
2000	0	0
2001	0	0
2002	0	0
2003	0	0
2004	0	0

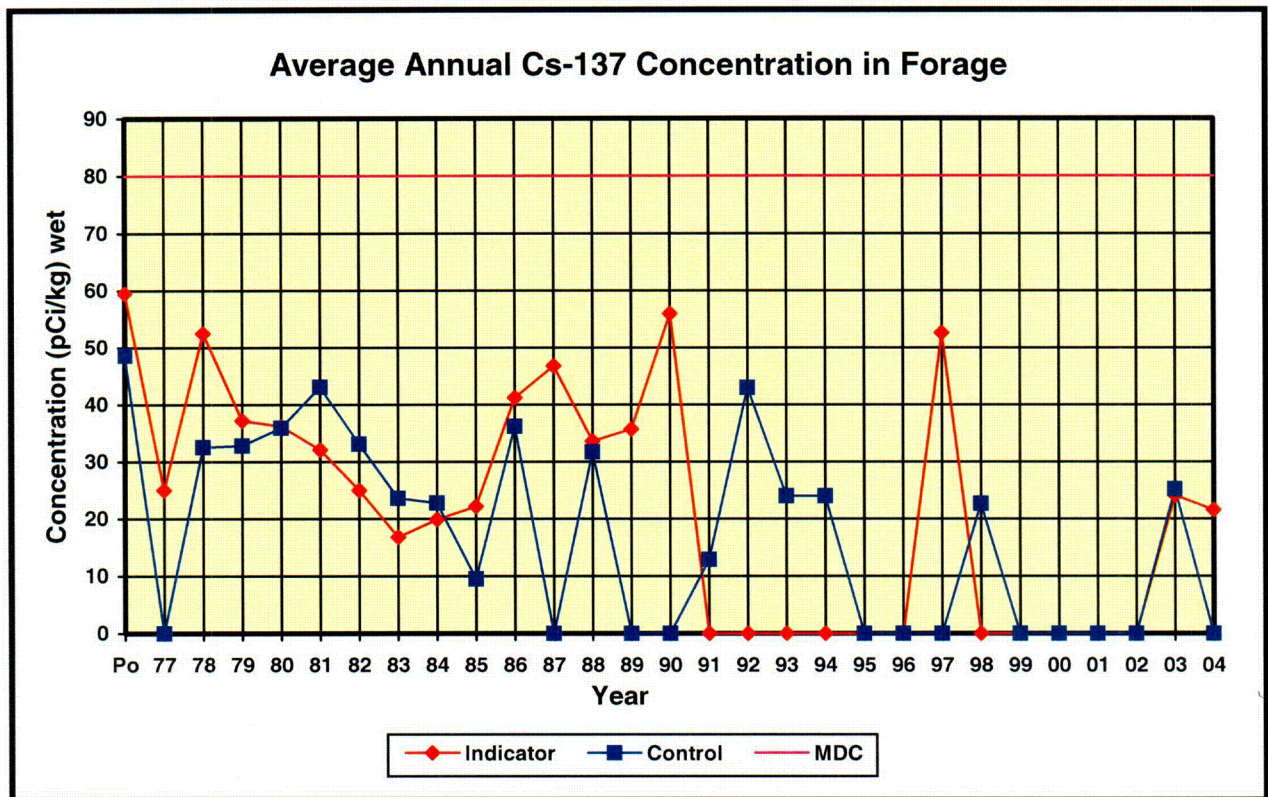
## 4.5 Forage

In accordance with Table 2-1, forage samples are collected every 4 weeks at two indicator stations on the plant perimeter, and at one control station located approximately 18 miles west of the plant, in Dothan. Gamma isotopic analyses are performed on each sample.

During preoperation and the years of operation through 1986 (the year of the Chernobyl incident), Cs-137 was typically found in about a third of the 35 to 40 forage samples collected per year. In 1987 and 1988 the number dropped to about a seventh of the total samples and from 1989 through 1994, it was only found in one or two samples every year. From 1994 to 2003, Cs-137 was detected in only a few samples, two indicator samples and three control samples.

In 2004, Cs-137 was not detected in any of the 13 control samples and in only 1 of the 26 indicator samples. Since there was only one positive result in all of the samples, no statistical analysis can be performed. The occasional presence of Cs-137 in vegetation samples is attributed primarily to fallout from nuclear weapons tests and from the Chernobyl incident. The level seen in 2004 in the one positive indicator sample (21.6 pCi/kg wet) is less than 2% of the reporting level. The MDC and RL for Cs-137 in forage are 80 and 2000 pCi/kg wet, respectively. Table 4.5-1 presents the average detectable results of Cs-137 found in forage over the life of the plant and Figure 4.5-1 shows the historical trending of this data.

Figure 4.5-1



C-09

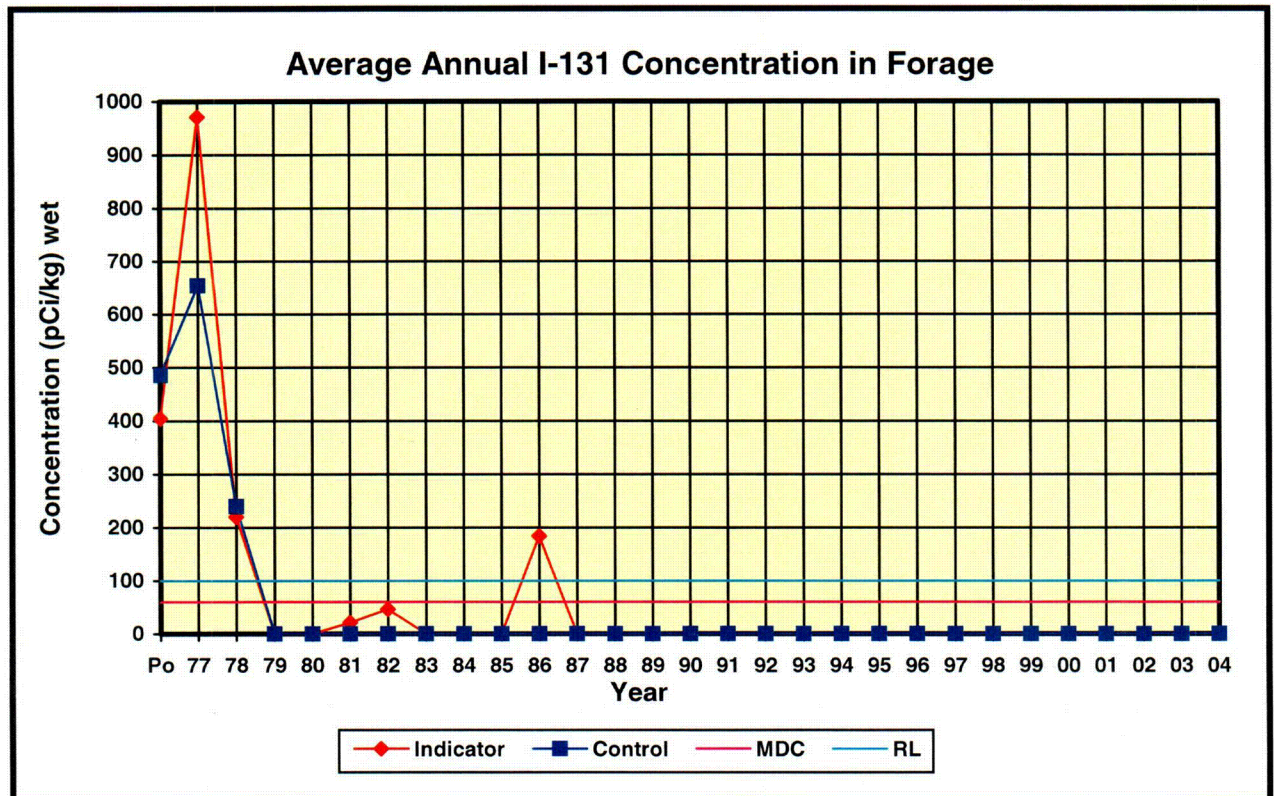
**Table 4.5-1**  
**Average Annual Cs-137 Concentration in Forage**

<b>Period</b>	<b>Indicator (pCi/kg) wet</b>	<b>Control (pCi/kg) wet</b>
Pre-op	59.4	48.6
1977	25.0	0
1978	52.5	32.5
1979	37.2	32.8
1980	36.2	35.9
1981	32.1	43.1
1982	25.0	33.1
1983	16.8	23.6
1984	19.9	22.8
1985	22.2	9.5
1986	41.2	36.2
1987	46.8	0
1988	33.6	31.7
1989	35.7	0
1990	56.0	0
1991	0	12.9
1992	0	43.0
1993	0	24.0
1994	0	24
1995	0	0
1996	0	0
1997	52.6	0
1998	0	22.7
1999	0	0
2000	0	0
2001	0	0
2002	0	0
2003	24.1	25.2
2004	21.6	0

During preoperation and in the early years of operation, I-131 was found in 10% to 25% of the forage samples at very high levels which ranged from around 100 to 1,000 pCi/kg wet. In 1986 (Chernobyl incident), I-131 reappeared after not having been detected for 3 years. The MDC and RL for I-131 are 60 and 100 pCi/kg wet, respectively. Table 4.5-2 lists the average detectable results of I-131 found in forage over the life of the plant and Figure 4.5-2 plots the historical trending of this data.

I-131 has not been detected in forage samples since the 1986 Chernobyl accident.

**Figure 4.5-2**



C-10

**Table 4.5-2**  
**Average Annual I-131 Concentration in Forage**

<b>Period</b>	<b>Indicator (pCi/kg) wet</b>	<b>Control (pCi/kg) wet</b>
Pre-op	405	486
1977	971	654
1978	220	240
1979	0	0
1980	0	0
1981	21.4	0
1982	46.4	0
1983	0	0
1984	0	0
1985	0	0
1986	184	0
1987	0	0
1988	0	0
1989	0	0
1990	0	0
1991	0	0
1992	0	0
1993	0	0
1994	0	0
1995	0	0
1996	0	0
1997	0	0
1998	0	0
1999	0	0
2000	0	0
2001	0	0
2002	0	0
2003	0	0
2004	0	0

These forage analyses results show the impact of the weapons tests during preoperation and the early years of operation and of the Chernobyl incident in 1986 and for a few years afterwards. The impact is reflected by the number of different radionuclides detected, the fraction of samples with detectable results, as well as the magnitude of the results. During preoperation and for the first few years of operation, 11 different radionuclides from fission and activation products were detected. By 1985, only 2 different radionuclides were detected and the fraction of samples with detectable results had diminished. In 1986, the same two nuclides as seen in 1985 appeared at a significantly higher magnitude and I-131 reappeared. In the years following 1986, only Cs-137 has been found in forage and it has been found in a decreasing fraction of the samples.

## 4.6 Ground Water

In the FNP environs, there are no true indicator sources of ground water. A well, located about four miles south-southeast of the plant on the east bank of the Chattahoochee River, serves Georgia Pacific Paper Company as a source of potable water and is designated as the indicator station. A deep well located about 1.2 miles southwest of the plant, which supplies water to the Whatley residence, is designated as the control station. Samples are collected quarterly and analyzed for gamma isotopic, I-131 and tritium as specified in Table 2-1. In 2004, one of 4 indicator samples was positive for tritium and two of 4 control samples were positive for tritium. No other radionuclides were detected.

In 1983, 1985, and 1986, Cs-134 was detected in single samples at levels ranging from 3 to 13 pCi/l. The MDC and RL for Cs-134 in water are 15 and 30 pCi/l, respectively.

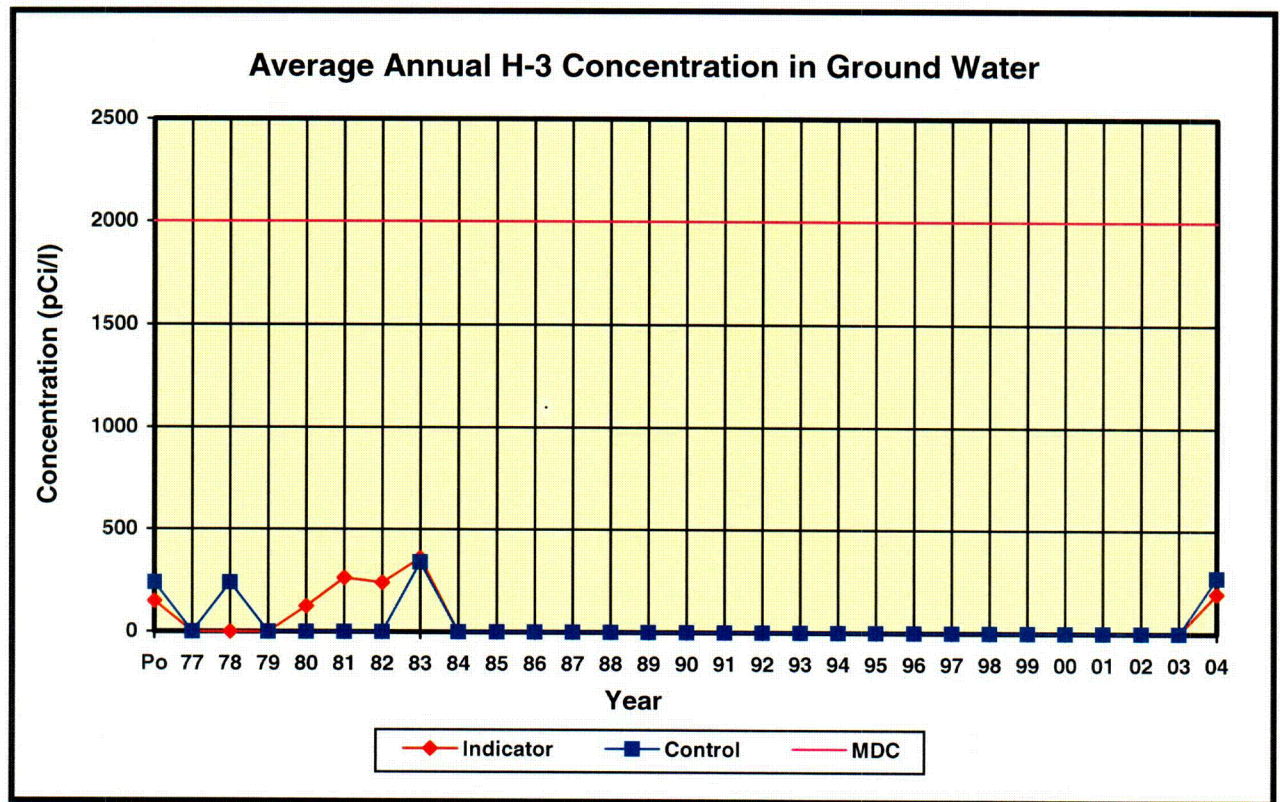
During preoperation, Cs-137 was detected in two of the samples at levels of 15 and 17 pCi/l. Then in 1984 and 1985, Cs-137 was again detected in a few samples with levels ranging from 4 to 5 pCi/l. The MDC and RL for Cs-137 in water are 18 and 50 pCi/l, respectively.

I-131 has never been detected in ground water samples. From 1986-2003, no radionuclides were detected. In 2004, tritium was detected at very low concentrations (near the instrument detection level). One of four indicator samples was positive (194 pCi/L), and two of four control samples were positive with the average of the two samples at 271 pCi/L. Application of the modified Student's t-test showed that the difference between the indicator station and the control station was not statistically discernible. The positive results are less than 2% of the reporting level for tritium. The MDC and RL for tritium are 2,000 and 20,000 pCi/l, respectively.

Figure 4.6-1 and Table 4.6-1 show the historical trending of the average annual detectable tritium concentration in ground water.



Figure 4.6-1



C-11



**Table 4.6-1**  
**Average Annual H-3 Concentration in Ground Water**

<b>Period</b>	<b>Indicator (pCi/l)</b>	<b>Control (pCi/l)</b>
Pre-op	150	240
1977	0	0
1978	0	240
1979	0	0
1980	124	0
1981	264	0
1982	240	0
1983	360	341
1984	0	0
1985	0	0
1986	0	0
1987	0	0
1988	0	0
1989	0	0
1990	0	0
1991	0	0
1992	0	0
1993	0	0
1994	0	0
1995	0	0
1996	0	0
1997	0	0
1998	0	0
1999	0	0
2000	0	0
2001	0	0
2002	0	0
2003	0	0
2004	194	271

## 4.7 Surface Water

As specified in Table 2-1 and shown in Figure 2-2, water samples are collected from the Chattahoochee River at a control station approximately 3 miles upstream of the intake structure and at an indicator station approximately 4 miles downstream of the discharge structure. Small quantities are collected during the week at periodic intervals using automatic samplers. For each station, one liter from each of four consecutive weekly samples is combined into a composite sample which is analyzed for gamma emitters. In addition, 0.075 liters is collected from 13 consecutive weekly samples for each station to form composite quarterly samples which are analyzed for tritium.

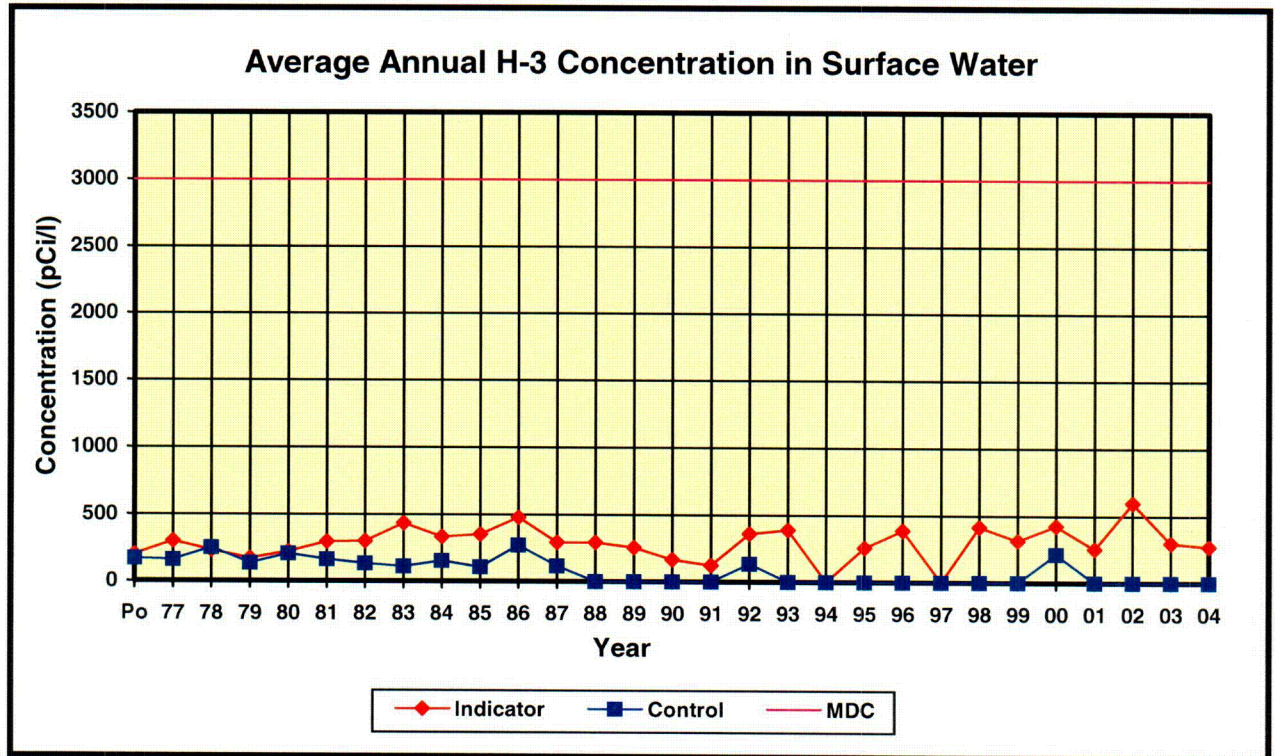
No detectable results have been found from these gamma isotopic analyses since 1988. During preoperation and in every year of operation through 1988 (except 1979 and 1980), a few samples showed at least one of nine different activation or fission products at levels less than or on the order of their MDCs. During preoperation, Cs-137 was found in about 3% of the samples. From 1981 through 1988, it was found in about 15% of the samples. Cs-134 was found in about 15% of the samples from 1981 to 1986. All of these gamma emitters are attributed to the weapons tests and the Chernobyl incident.

As shown in Table 3-1, tritium was detected in the composite samples collected at the indicator station. The average concentration was 270 pCi/l. No tritium was found at the control station during 2004. Therefore, this small tritium concentration, which is about 1% of the RL, may be attributed to plant releases.

Historical trending of the detectable concentrations of tritium in surface water is provided in Figure 4.7-1 and Table 4.7-1. The slightly elevated plot of the indicator stations is indicative of plant tritium contributions to surface water, although it is noteworthy that the annual average levels are less than 10% of the MDC and less than 1% of the RL. The MDC and RL for tritium in surface water are 3000 and 30,000, respectively.

As shown in Table 4-3, there were two deviations involving surface water sampling in 2004. However, none of the deviations resulted in excluded data.

Figure 4.7-1



C-12

**Table 4.7-1**  
**Average Annual H-3 Concentration in Surface Water**

<b>Period</b>	<b>Indicator (pCi/l)</b>	<b>Control (pCi/l)</b>
Pre-op	200	170
1977	300	160
1978	230	250
1979	169	135
1980	221	206
1981	294	162
1982	300	132
1983	434	111
1984	333	152
1985	351	105
1986	478	272
1987	291.8	116.5
1988	293.3	0
1989	253.8	0
1990	166	0
1991	122	0
1992	360.5	134
1993	388.8	0
1994	0	0
1995	257	0
1996	386	0
1997	0	0
1998	415	0
1999	314	0
2000	424	212
2001	252	0
2002	598	0
2003	296	0
2004	270	0

## 4.8 Fish

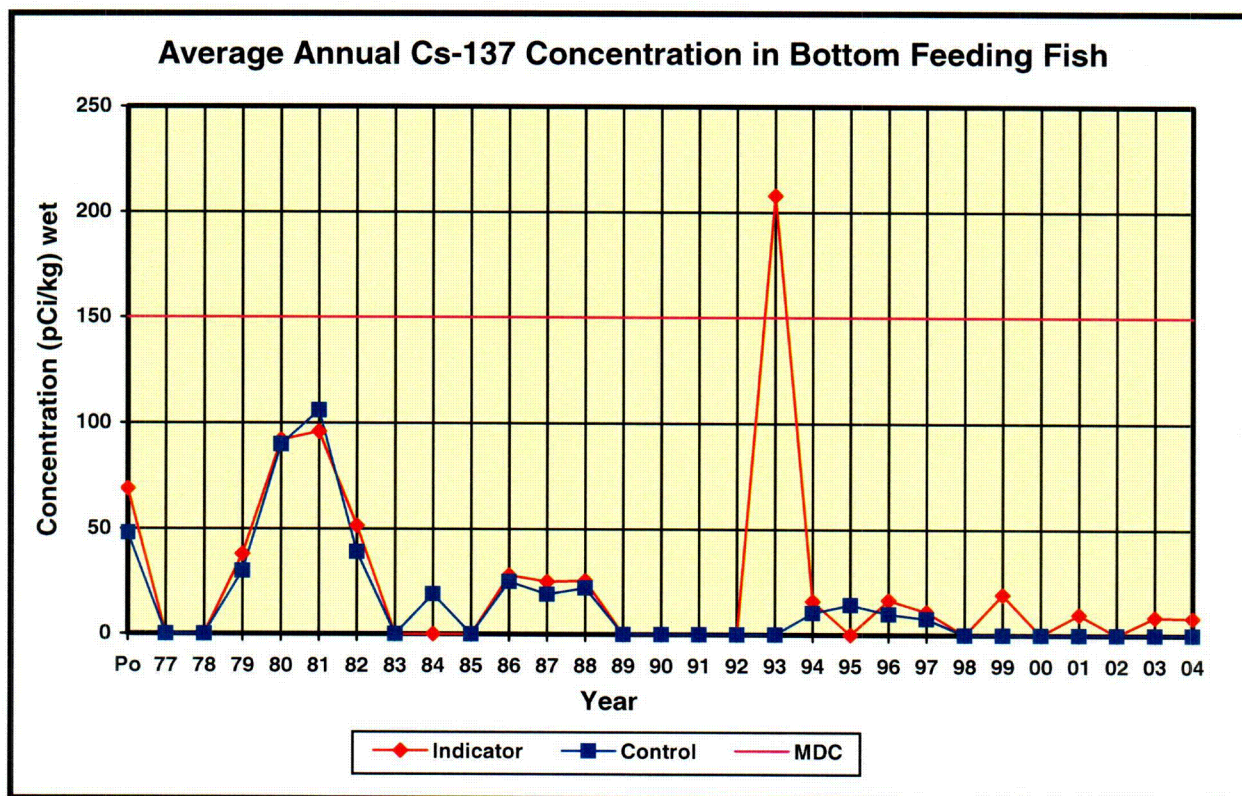
Two types of fish (bottom feeding and game) are collected semiannually from the Chattahoochee River at a control station several miles upstream of the plant intake structure and at an indicator station a few miles downstream of the plant discharge structure. These locations are shown in Figure 2-2. Gamma isotopic analysis is performed on the edible portions of each sample as specified in Table 2-1.

As provided in Table 3-1, Cs-137 was the only radionuclide of interest that was found from the gamma isotopic analysis of fish samples in 2004. In the spring collection, Cs-137 was detected in both the indicator and the control game fish samples. The indicator sample was 14.55 pCi/kg wet and the control sample was 10.75 pCi/kg wet. In the fall, Cs-137 was detected in the game fish indicator sample at 10.83 pCi/kg wet and was not detected in the control sample. Application of the modified Student's t-test showed that the difference between the indicator station (average of both positive values) and the control station was not statistically discernible. The MDC for Cs-137 in fish is 150 pCi/kg wet and the RL is 2000 pCi/kg wet. The average positive value at the indicator station (12.69 pCi/kg wet) was less than 1% of the RL.

In the spring collection, Cs-137 was not detected in either of the bottom feeding fish sample locations. In the fall, Cs-137 was detected at the indicator station (8.1 pCi/kg wet) but not at the control station. The positive value at the indicator station is just at the detection threshold for the instrument. The MDC for Cs-137 in fish is 150 pCi/kg wet.

Historically, Cs-137 has been found in approximately 30% of the bottom feeding fish samples and in 80% of the game fish samples. Figures 4.8-1 and 4.8-2 and Tables 4.8-1 and 4.8-2 provide the historical trending of the average annual detectable concentrations of Cs-137 in pCi/kg wet in bottom feeding and game fish, respectively. Since the early 1980s, values have generally decreased for both indicator and control groups, with the exception of the bottom feeding fish collected at the indicator station in 1993. While some contribution from the plant cannot be ruled out, most of the Cs-137 in these samples may be attributed to the nuclear weapons tests and the Chernobyl incident, as evidenced by the normally close agreement between the control and indicator station results.

Figure 4.8-1



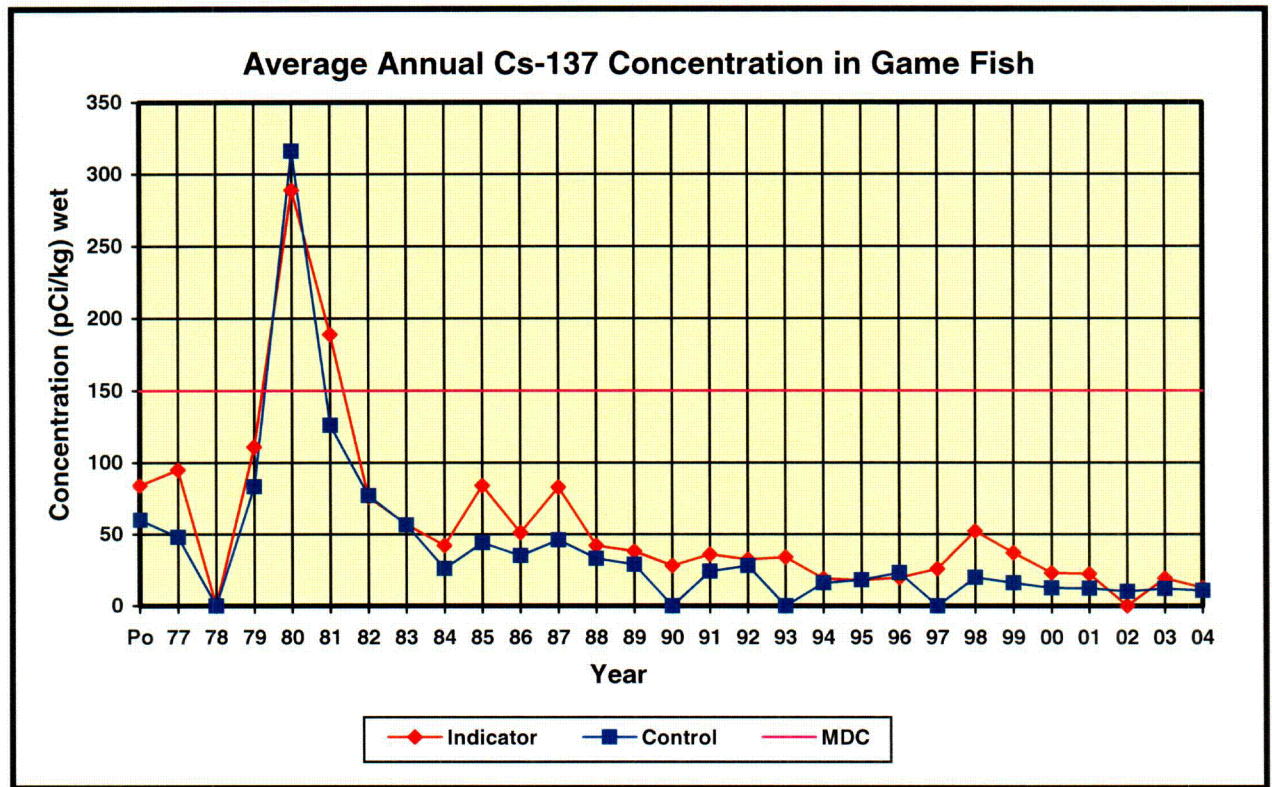
C-13

**Table 4.8-1**  
**Average Annual Cs-137 Concentration in Bottom Feeding Fish**

<b>Period</b>	<b>Indicator (pCi/kg) wet</b>	<b>Control (pCi/kg) wet</b>
Pre-op	69	48
1977	0	0
1978	0	0
1979	38	30
1980	92	90
1981	96	106
1982	51.5	39.0
1983	0	0
1984	0	19
1985	0	0
1986	28	25
1987	25	19
1988	25.5	22.0
1989	0	0
1990	0	0
1991	0	0
1992	0	0
1993	208	0
1994	15.9	10.3
1995	0	14.2
1996	16.4	9.9
1997	10.9	7.7
1998	0	0
1999	19.2	0
2000	0	0
2001	9.8	0
2002	0	0
2003	0	8.5
2004	0	8.1



Figure 4.8-2



C-14



**Table 4.8-2**  
**Average Annual Cs-137 Concentration in Game Fish**

<b>Period</b>	<b>Indicator (pCi/kg) wet</b>	<b>Control (pCi/kg) wet</b>
Pre-op	84	60
1977	95	48
1978	0	0
1979	111	83.5
1980	289	316
1981	189	126
1982	76	77
1983	57	56.5
1984	42	26
1985	84	44
1986	51	35
1987	83	46
1988	42	33
1989	38	29
1990	28	0
1991	36	24
1992	32.5	28
1993	34	0
1994	19	16
1995	17.9	18.2
1996	19.6	23.1
1997	25.9	0
1998	52	20
1999	36.9	15.9
2000	22.9	12.5
2001	22.4	12.3
2002	0	10.1
2003	19.3	12.0
2004	12.7	10.8

Radionuclides of interest other than Cs-137 have been found in only a few samples in the past. The following table provides a summary of the results in pCi/kg wet compared with the applicable MDCs.

<b>YEAR</b>	<b>Nuclide</b>	<b>Fish Type</b>	<b>Indicator (pCi/kg)</b>	<b>Control (pCi/kg)</b>	<b>MDC (pCi/kg)</b>
<b>1978</b>	Ce-144	Bottom Feeding	0	200	
<b>1981</b>	Nb-95	Bottom Feeding	38	0	50 (a)
<b>1982</b>	Nb-95	Game	31	0	50 (a)
<b>1986</b>	Co-60	Game	25	0	130

(a) Determined by the EL. Not defined in ODCM Table 4-3 (Table 4-1 of this report)

## 4.9 Sediment

River sediment samples are collected semiannually on the Chattahoochee River at a control station which is approximately 4 miles upstream of the intake structure and at an indicator station which is approximately 2 miles downstream of the discharge structure as shown in Figure 2-2. A gamma isotopic analysis is performed on each sample as specified in Table 2-1. During 2004, no radionuclides of interest were detected.

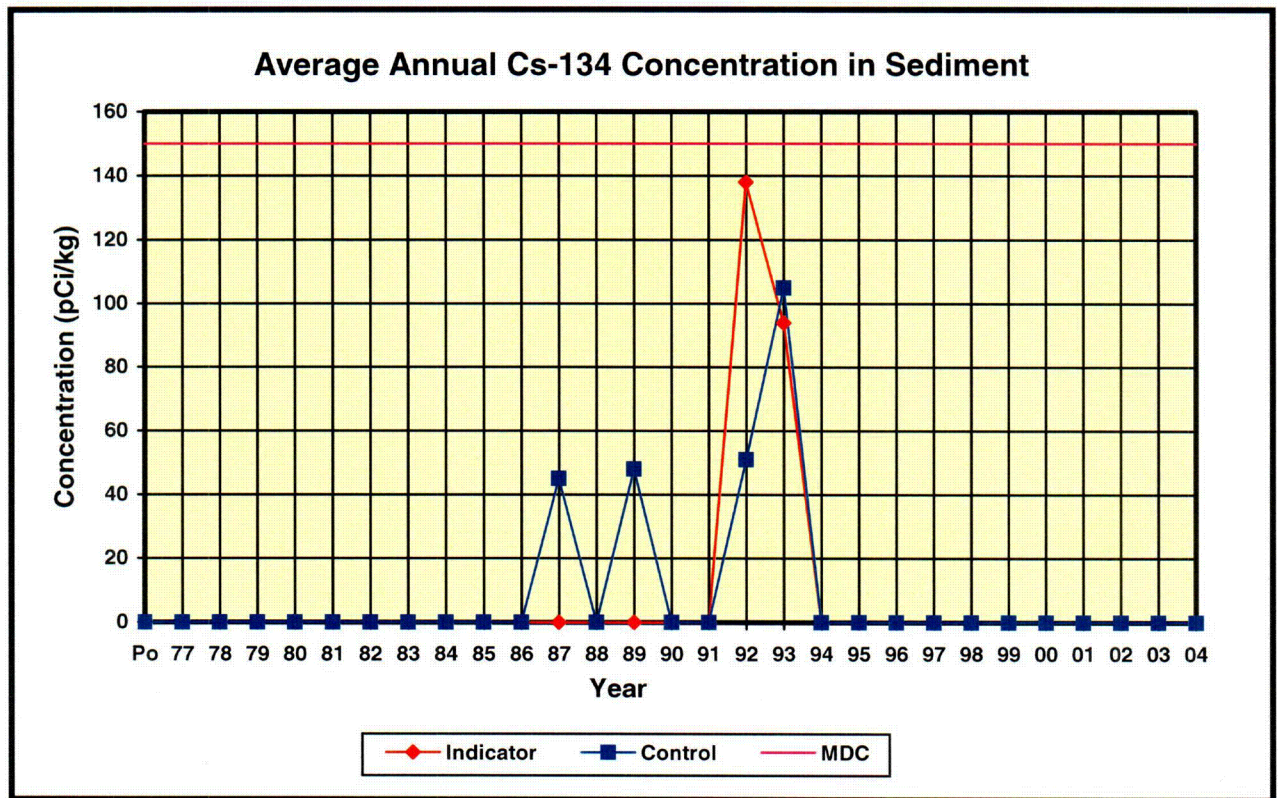
Historically, Be-7, Cs-134, Cs-137, and Nb-95 have been detected in some samples. These positive results were generally for samples collected at the control station. A summary of the positive historical results for these nuclides along with their applicable MDCs in units of pCi/kg dry is provided in Table 4.9. Cs-134 and Cs-137 data are plotted in Figures 4.9-1 and 4.9-2, respectively.

**Table 4.9**  
**Sediment Nuclide Concentrations**

Nuclide	YEAR	Indicator (pCi/kg)	Control (pCi/kg)	MDC (pCi/kg)
Be-7	1985	535	945	655 (a)
	2003	199	0	
Cs-134	1987	0	45	150
	1989	0	48	
	1992	138	51	
	1993	94	105	
Cs-137	1981	0	185	180
	1985	0	97	
	1989	0	39	
	1994	29	11	
	1996	11.8	0	
Nb-95	1981	52	113	50 (a)

(a) Determined by the EL. Not defined in ODCM Table 4-3 (Table 4-1 of this report).

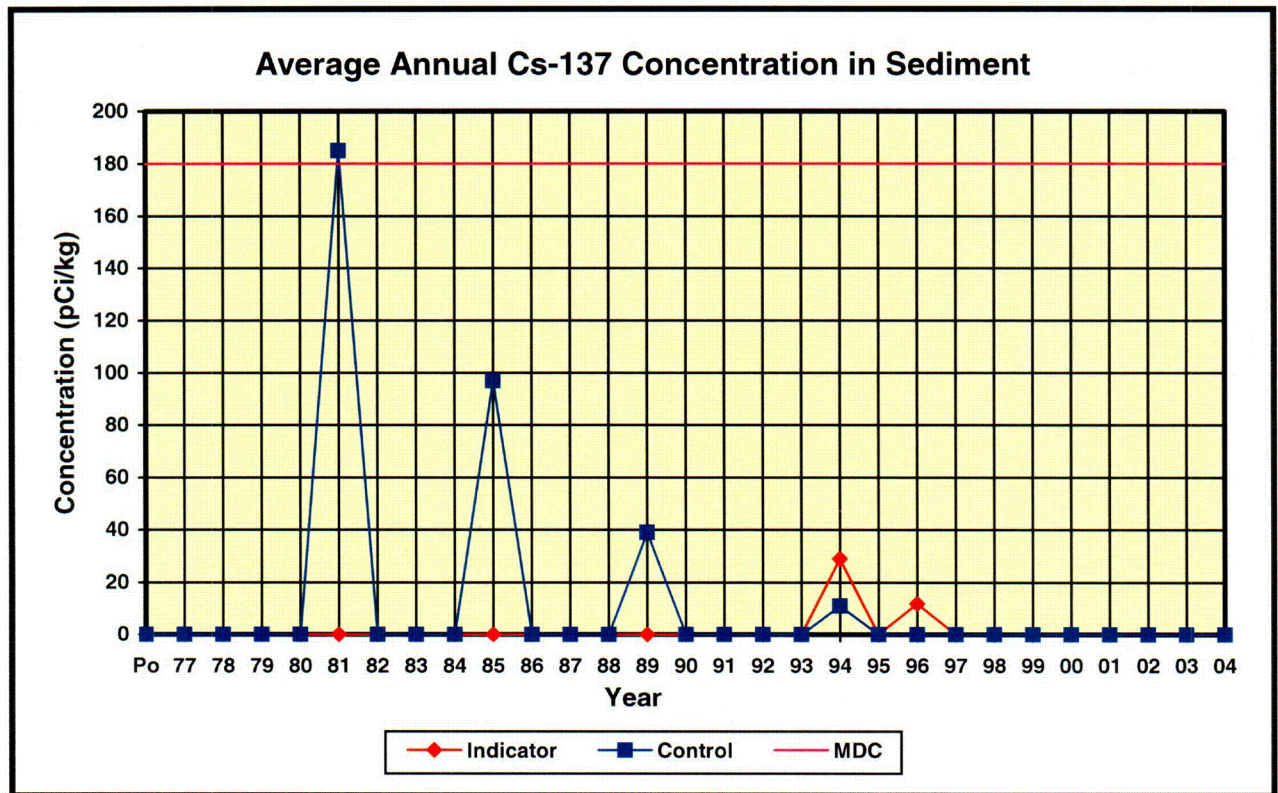
Figure 4.9-1



The positive results for Cs-134 appear mostly at the control station. Due to its relatively short half-life of approximately 2 years, the positive results may be attributed to the Chernobyl incident. The overall plotting of the positive results does not show any discernible trends.

C-15

Figure 4.9-2



Cs-137 appears to be trending down since the ceasing of above ground weapons testing and the majority of the positive results appear at the control stations. Therefore in general, the positive results can be attributed to the weapons tests and the Chernobyl incident.

C-16

## 5.0 INTERLABORATORY COMPARISON PROGRAM

In accordance with ODCM 4.1.3, the EL participates in an ICP that satisfies the requirements of Regulatory Guide 4.15, Revision 1, "Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment", February 1979. The guide indicates the ICP is to be conducted with the Environmental Protection Agency (EPA) Environmental Radioactivity Laboratory Intercomparison Studies (Cross-check) Program or an equivalent program, and the ICP should include all of the determinations (sample medium/radionuclide combinations) that are offered by the EPA and included in the REMP.

The ICP is conducted by Analytics, Inc. of Atlanta, Georgia. Analytics has a documented Quality Assurance (QA) program and the capability to prepare Quality Control (QC) materials traceable to the National Institute of Standards and Technology. The ICP is a third party blind testing program which provides a means to ensure independent checks are performed on the accuracy and precision of the measurements of radioactive materials in environmental sample matrices. Analytics supplies the crosscheck samples to the EL which performs the laboratory analyses in a normal manner. Each of the specified analyses is performed three times. The results are then sent to Analytics who performs an evaluation which may be helpful to the EL in the identification of instrument or procedural problems.

The samples offered by Analytics and included in the EL analyses are gross beta and gamma isotopic analyses of an air filter; gamma isotopic analyses of milk samples; and gross beta, tritium and gamma isotopic analyses of water samples.

The accuracy of each result is measured by the normalized deviation, which is the ratio of the reported average less the known value to the total error. The total error is the square root of the sum of the squares of the uncertainties of the known value and of the reported average. The uncertainty of the known value includes all analytical uncertainties as reported by Analytics. The uncertainty of the reported average is the propagated error of the values in the reported average by the EL. The precision of each result is measured by the coefficient of variation, which is defined as the standard deviation of the reported result divided by the reported average. An investigation is undertaken whenever the absolute value of the normalized deviation is greater than three or whenever the coefficient of variation is greater than 15% for all radionuclides other than Cr-51 and Fe-59. For Cr-51 and Fe-59, an investigation is undertaken when the coefficient of variation exceeds the values shown as follows:

Nuclide	Concentration *	Total Sample Activity (pCi)	Percent Coefficient of Variation
Cr-51	<300	NA	25
Cr-51	NA	>1000	25
Cr-51	>300	<1000	15
Fe-59	<80	NA	25
Fe-59	>80	NA	15

\* For air filters, concentration units are pCi/filter. For all other media, concentration units are pCi/liter (pCi/l).

As required by ODCM 4.1.3.3 and 7.1.2.3, a summary of the results of the EL's participation in the ICP is provided in Table 5-1 for: the gross beta and gamma isotopic analyses of an air filter; gamma isotopic analyses of milk samples; and gross beta, tritium and gamma isotopic analyses of water samples. Delineated in this table for each of the media/analysis combinations, are: the specific radionuclides; Analytics' preparation dates; the known values with their uncertainties supplied by Analytics; the reported averages with their standard deviations; and the resultant normalized deviations and coefficients of variation expressed as a percentage.

It may be seen from Table 5-1 that all 2004 results were acceptable for precision and accuracy. The activity for Fe-59 was trending with a positive bias. The analysis is performed by gamma spectroscopy and will be investigated in 2005.



TABLE 5-1 (SHEET 1 of 3)

## INTERLABORATORY COMPARISON PROGRAM RESULTS

## GROSS BETA ANALYSIS OF AN AIR FILTER (pCi/filter)

Analysis or Radionuclide	Date Prepared	Reported Average	Known Value	Standard Deviation EL	Uncertainty Analytics (3S)	Percent Coef of Variation	Normalized Deviation
Gross Beta	09/16/04	55	53.6	2.64	0.90	9.00	0.22

## GAMMA ISOTOPIC ANALYSIS OF AN AIR FILTER (pCi/filter)

Analysis or Radionuclide	Date Prepared	Reported Average	Known Value	Standard Deviation EL	Uncertainty Analytics (3S)	Percent Coef of Variation	Normalized Deviation
Ce-141	09/16/04	180	190	2.97	2.11	3.70	-1.53
Co-58	09/16/04	69	71.9	1.85	0.80	5.60	-0.74
Co-60	09/16/04	90.2	95.2	2.19	1.06	4.58	-1.20
Cr-51	09/16/04	190.5	170	11.59	1.89	13.20	0.81
Cs-134	09/16/04	65.4	73.3	3.88	0.81	7.40	-1.63
Cs-137	09/16/04	165.5	163	2.53	1.81	3.96	0.38
Fe-59	09/16/04	76.9	69.5	0.69	0.77	6.42	1.50
Mn-54	09/16/04	142.1	138	2.49	1.53	4.20	0.69
Zn-65	09/16/04	142.7	136	5.22	1.51	6.28	0.75

## GAMMA ISOTOPIC ANALYSIS OF A MILK SAMPLE (pCi/liter)

Analysis or Radionuclide	Date Prepared	Reported Average	Known Value	Standard Deviation EL	Uncertainty Analytics (3S)	Percent Coef of Variation	Normalized Deviation
Ce-141	06/17/04	160	157	7.1	1.74	4.44	0.40
Co-58	06/17/04	48	46.2	4.52	0.51	9.41	0.39
Co-60	06/17/04	172	172	6.64	1.91	3.86	0.00
Cr-51	06/17/04	247	228	37.01	2.53	14.98	0.51
Cs-134	06/17/04	102	101	4.01	1.12	3.93	0.23
Cs-137	06/17/04	158	156	7.89	1.73	4.99	0.24

**TABLE 5-1 (SHEET 2 of 3)**

**INTERLABORATORY COMPARISON PROGRAM RESULTS**

**GAMMA ISOTOPIC ANALYSIS OF A MILK SAMPLE (pCi/liter)**

<b>Analysis or Radionuclide</b>	<b>Date Prepared</b>	<b>Reported Average</b>	<b>Known Value</b>	<b>Standard Deviation EL</b>	<b>Uncertainty Analytics (3S)</b>	<b>Percent Coef of Variation</b>	<b>Normalized Deviation</b>
Fe-59	06/17/04	60	44.5	9.17	0.49	15.28	1.69
I-131	06/17/04	61	58.2	5.48	0.65	8.98	0.50
Mn-54	06/17/04	75	70.5	5.86	0.78	7.81	0.75
Zn-65	06/17/04	105	99.3	10.2	1.10	9.72	0.55

**GROSS BETA ANALYSIS OF WATER SAMPLE (pCi/liter)**

<b>Analysis or Radionuclide</b>	<b>Date Prepared</b>	<b>Reported Average</b>	<b>Known Value</b>	<b>Standard Deviation EL</b>	<b>Uncertainty Analytics (3S)</b>	<b>Percent Coef of Variation</b>	<b>Normalized Deviation</b>
Gross Beta	03/25/04	296	276	9.17	3.00	3.00	1.89
	06/17/04	299	286	13.94	3.18	10.00	0.45

**GAMMA ISOTOPIC ANALYSIS OF WATER SAMPLES (pCi/liter)**

<b>Analysis or Radionuclide</b>	<b>Date Prepared</b>	<b>Reported Average</b>	<b>Known Value</b>	<b>Standard Deviation EL</b>	<b>Uncertainty Analytics (3S)</b>	<b>Percent Coef of Variation</b>	<b>Normalized Deviation</b>
Ce-141	03/25/04	83	85	6.2	1.00	7.47	-0.31
Co-58	03/25/04	116	112	6.72	1.33	5.79	0.57
Co-60	03/25/04	148	153	5.94	1.67	4.01	-0.78
Cr-51	03/25/04	369	326	37.5	3.67	9.47	1.85
Cs-134	03/25/04	92	90	4.2	1.00	4.57	0.45



TABLE 5-1 (SHEET 3 of 3)

INTERLABORATORY COMPARISON PROGRAM RESULTS

GAMMA ISOTOPIC ANALYSIS OF WATER SAMPLES (pCi/liter)

Analysis or Radionuclide	Date Prepared	Reported Average	Known Value	Standard Deviation EL	Uncertainty Analytics (3S)	Percent Coef of Variation	Normalized Deviation
Cs-137	03/25/04	193	185	8.75	2.00	4.53	0.86
Fe-59	03/25/04	74	57	7.84	0.67	10.59	2.10
I-131	03/25/04	90	90	5.74	1.00	6.38	0.00
Mn-54	03/25/04	119	114	7.14	1.33	6.00	0.67
Zn-65	03/25/04	146	143	12.78	1.67	8.75	0.23

TRITIUM ANALYSIS OF WATER SAMPLES (pCi/liter)

Analysis or Radionuclide	Date Prepared	Reported Average	Known Value	Standard Deviation EL	Uncertainty Analytics (3S)	Percent Coef of Variation	Normalized Deviation
H-3	03/25/04	4452	4700	140.32	100.00	6.00	-0.92
	06/17/04	11871	11900	168.96	133.33	1.00	-0.13

## 6.0 CONCLUSIONS

This report confirms the licensee's conformance with the requirements of Chapter 4 of the ODCM during 2004. It provides a summary and discussion of the results of the laboratory analyses for each type of sample.

All of the radiological levels were low and are generally trending downward.

In 2004, there were three instances for which the indicator station readings were statistically discernible from the control station readings. These instances are discussed in the following paragraphs.

Tritium was detected in surface water at the indicator station at a concentration of 270 pCi/l, which is approximately 1% of the RL. No tritium was detected at the control station. Therefore, this tritium concentration could be attributed to plant releases. Although no drinking water pathway via surface water exists in the plant vicinity, a potential dose from tritium in the drinking water pathway was calculated using the methodology in the FNP ODCM. This dose was calculated assuming that a person regularly consumed drinking water from the river downstream, near the indicator station for surface water sampling. Under these assumed circumstances, the potential dose to such an individual would be about  $2.1\text{E-}2$  mrem in a year. This dose would be less than 1% of the annual dose limit (3 mrem) for the total body, due to liquid effluents. Another pathway to obtain dose from tritium in the river is through consumption of fish. The potential total body dose for an adult who consumed fish regularly from the river would be about  $5.4\text{E-}4$  mrem/yr. This extremely small dose is less than 0.02% of the annual limit for the total body, due to liquid effluents.

Cesium-137 was detected in the bottom feeding fish sample at the indicator station in the fall collection only with no Cs-137 detected at the control station in the spring or fall. The positive value at the indicator was 8.1 pCi/kg wet. If an adult consumed game fish regularly from the river, this person could potentially receive  $1.2\text{E-}2$  mrem/yr dose due to Cs-137. This dose is approximately 0.4% of the annual dose limit for the total body, due to liquid effluents.

Cesium-137 was detected in forage in one of the 26 samples taken at indicator stations and not in any of the 13 samples taken at the control stations. The positive value was 21.6 pCi/kg wet. If a member of the public in the adult age group, the age group for which the dose would be the highest under these circumstances, annually consumed leafy garden vegetation containing Cs-137 at this level, the annual dose to the total body would be 0.035 mrem which is 0.23% of the regulatory limit. As discussed in the forage section of this report, low levels of Cs-137 in vegetation samples is attributed primarily to fallout from nuclear weapons tests and from the Chernobyl incident.

No discernible radiological impact upon the environment or the public as a consequence of plant discharges to the atmosphere and to the river was established for any other REMP samples.

