

CHAPTER 12.0

SPECIAL NOTE

The transfer of the Radiological Effluent Technical Specifications to the ODCM by Technical Specification, Amendment 35, dated April 13, 1992, was approved by the Nuclear Regulatory Commission.

Improved Technical Specifications (I.T.S.) sections are annotated following the CTS section and are only applicable after implementation of I.T.S.

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BRAIDWOOD

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CHAPTER 12

ANNEX INDEX

Revision 5

CHAPTER 12

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12.0 RADIOLOGICAL EFFLUENT TECHNICAL STANDARDS

Chapter 12 of the Braidwood Station ODCM is a compliance of the various regulatory requirements, surveillance and bases, commitments and/or components of the radiological effluent and environmental monitoring programs for Braidwood Station. To assist in the understanding of the relationship between effluent regulations, ODCM equations, RETS (Chapter 12 section) and related Technical Specification (I.T.S.) requirements, Table 12.0-1 is a matrix which relates these various components. The Radiological Environmental Monitoring Program fundamental requirements are contained within this chapter with Braidwood specific information in Chapter 11 and with a supplemental matrix in Table 12.0-2.

Table 12.0-1

EFFLUENT COMPLIANCE MATRIX

| Regulation | Dose Component Limit | ODCM Equation | RETS | Technical Specification (ITS) |
|--|---|--------------------|--------|-------------------------------|
| 10CFR50 Appendix I | 1. Gamma air dose and beta air dose due to airborne radioactivity in effluent plume. | A-1 A-2 | 12.4.2 | 6.8.4.e.8 (5.5.4.h) |
| | a. Whole body and skin dose due to airborne radioactivity in effluent plume are reported only if certain gamma and beta air dose criteria are exceeded. | A-6 A-7 | N/A | N/A |
| | 2. CDE for all organs and all four age groups due to iodines and particulates in effluent plume. All pathways are considered. | A-13 | 12.4.3 | 6.8.4.e.9 (5.5.4.i) |
| | 3. CDE for all organs and all four age groups due to radioactivity in liquid effluents. | A-29 | 12.3.2 | 6.8.4.e.4 (5.5.4.d) |
| 10CFR20 | 1. TEDE, totaling all deep dose equivalent components (direct, ground and plume shine) and committed effective dose equivalents (all pathways, both airborne and liquid-borne). CDE evaluation is made for adult only using FGR 11 data base. | A-38 | 12.4.6 | 6.8.4.e.3 (5.5.4.c) |
| 40CFR190 (now by reference, also part of 10CFR20) | 1. Whole body dose (DDE) due to direct dose, ground and plume shine from all sources at a station. | A-35 | 12.4.5 | 6.8.4.e.10 (5.5.4.j) |
| | 2. Organ doses (CDE) to an adult due to all pathways. | A-13 | | |
| Technical Specifications (I.T.S.) | 1. "Instantaneous" whole body (DDE), skin (SDE), and organ (CDE) dose rates to an adult due to radioactivity in airborne effluents. For the organ dose, only inhalation is considered. | A-8 A-9 A-28 | 12.4.1 | 6.8.4.e.7 (5.5.4.g) |
| | 2. "Instantaneous" concentration limits for liquid effluents. | A-32 | 12.3.1 | 6.8.4.e.2 (5.5.4.b) |
| Technical Specifications (I.T.S.) | 1. Radiological Effluent Release Report | NA | 12.6.2 | 6.9.1.7 (5.6.3) |

Table 12.0-2

REMP COMPLIANCE MATRIX

| Regulation | Dose Component Limit | RETS | Technical Specification (ITS) |
|-----------------------------------|---|--------|-------------------------------|
| 10CFR50 Appendix I Section IV.B.2 | Implement environmental monitoring program. | 12.5.1 | 6.8.4.f (TRM 5.2.C.1) |
| Technical Specification (I.T.S.) | Land Use Census | 12.5.2 | 6.8.4.f.2 (TRM 5.2.C.2) |
| Technical Specifications (I.T.S.) | Interlaboratory Comparison Program | 12.5.3 | 6.8.4.f.3 (TRM 5.2.C.3) |
| Technical Specifications (I.T.S.) | Radiological Environmental Operating Report | 12.6.1 | 6.9.1.6 (5.6.2) |

12.0 RADIOLOGICAL EFFLUENT TECHNICAL STANDARDS12.1 DEFINITIONS

- 12.1.1 Action shall be that which prescribes remedial measures required under designated conditions.
- 12.1.2 Analog Channel Operational Test shall be the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY of alarm, interlock and/or trip functions. The ANALOG CHANNEL OPERATIONAL TEST shall include adjustments, as necessary, of the alarm interlock and/or Trip Setpoints such that the Setpoints are within the required range and accuracy.
- 12.1.3 Channel Calibration shall be the adjustment, as necessary, of the channel such that it responds within the required range and accuracy to known values of input. The CHANNEL CALIBRATION shall encompass the entire channel including the sensors and alarm, interlock and/or trip functions and may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is calibrated.
- 12.1.4 Channel Check shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.
- 12.1.5 Continuous Sampling is uninterrupted sampling with the exception of sampling interruptions of short duration's, for routine activities (e.g. filter replacement)
- 12.1.6 Digital Channel Operational Test shall consist of exercising the digital computer hardware using data base manipulation and injecting simulated process data to verify OPERABILITY of alarm and/or trip functions.
- 12.1.7 Dose Equivalent I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites", or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP 30, Supplement to Part 1, page 192-212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity".
- 12.1.8 Frequency - Table 12.1-1 provides the definitions of various frequencies for which surveillance's, sampling, etc. are performed unless defined otherwise. The 25% variance shall not be applied to Operability Action Statements. The bases to Technical Specification 4.0.2 (I.T.S. SR 3.0.2) sprovide clarifications to this requirement.
- 12.1.9 Member(s) of the Public means any individual except when that individual is receiving an occupational dose.
- 12.1.10 Occupational Dose means the dose received by an individual in the course of employment in which the individual's assigned duties involve exposure to radiation or to radioactive material from licensed and unlicensed sources of radiation, whether in the possession of the licensee or other person. Occupational dose does not include dose received from background radiation, from any medical administration the individual has received, from exposure to individuals administered radioactive material and released in accordance with 10CFR35.75, from voluntary participation in medical research programs, or as a member of the public.

12.0 RADIOLOGICAL EFFLUENT TECHNICAL STANDARDS (Cont.)

- 12.1.11 Operable/Operability a system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).
- 12.1.12 Operational Mode (i.e. Mode) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.2 of the Technical Specifications (I.T.S. Table 1.1-1).
- 12.1.13 Process Control Program (PCP) shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, 71 and State regulations, burial ground requirements, and other requirements governing the disposal of radioactive wastes.
- 12.1.14 Purge/Purging shall be any controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.
- 12.1.15 Rated Thermal Power shall be a total reactor core heat transfer rate to the reactor coolant of 3586.6 MWt.
- 12.1.16 Site Boundary shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.
- 12.1.17 Solidification shall be the conversion of wet wastes into a form that meets shipping and burial ground requirements.
- 12.1.18 Source Check shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.
- 12.1.19 Thermal Power shall be the total core heat transfer rate to the reactor coolant.
- 12.1.20 Unrestricted Area means an area, access to which is neither limited nor controlled by the licensee.
- 12.1.21 Ventilation Exhaust Treatment System shall be any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Features Atmospheric Cleanup Systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

12.0 RADIOLOGICAL EFFLUENT TECHNICAL STANDARDS (Cont.)

- 12.1.22 Venting shall be any controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.
- 12.1.23 Waste Gas Holdup System shall be any system designed and installed to reduce radioactive gaseous effluents by collecting Reactor Coolant System off-gases from the Reactor Coolant System and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.
- 12.1.24 Definitions Peculiar to Estimating Dose to Members of the Public using the ODCM Computer Program.
- a. ACTUAL - ACTUAL refers to using known release data to project the dose to members of the public for the previous time period. This data is stored in the database and used to demonstrate compliance with the reporting requirements of Chapter 12.
 - b. PROJECTED - PROJECTED refers to using known release data from the previous time period or estimated release data to forecast a future dose to members of the public. This data is not incorporated into the database.

TABLE 12.1-1

FREQUENCY NOTATIONS*

| <u>NOTATION</u> | <u>FREQUENCY</u> |
|---------------------|---|
| S - Shiftly | At least once per 12 hours. |
| D - Daily | At least once per 24 hours. |
| W - Weekly | At least once per 7 days. |
| M - Monthly | At least once per 31 days. |
| Q - Quarterly | At least once per 92 days. |
| SA - Semiannually | At least once per 184 days. |
| A - Annually | At least once per 366 days. |
| R - Refueling cycle | At least once per 18 months (550 days). |
| S/U - Startup | Prior to each reactor startup. |
| P - Prior | Prior to each radioactive release. |
| N.A. | Not applicable. |

* Each frequency requirement shall be performed within the specified time interval with the maximum allowable extension not to exceed 25% of the frequency interval. The 25% variance shall not be applied to Operability Action Statements. The bases to Technical Specification 4.0.2 (I.T.S. SR 3.0.2) provide clarifications to this requirement. These frequency notations do not apply to the Radiological Environmental Monitoring Program (REMP) as described in Section 12.5.

12.2 INSTRUMENTATION**12.2.1 Radioactive Liquid Effluent Monitoring Instrumentation****Operability Requirements**

12.2.1.A The radioactive liquid effluent monitoring instrumentation channels shown in Table 12.2-1 shall be OPERABLE with their Alarm/Trip Setpoints set to ensure that the limits of 12.3.1.A are not exceeded. The Alarm/Trip Setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

Applicability: At all times

Action

1. With a radioactive liquid effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above specification, immediately suspend the release of radioactive liquid effluents monitored by the affected channel, or declare the channel inoperable.
2. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 12.2-1. Restore the inoperable instrumentation to OPERABLE status within the time specified in the ACTION, or explain in the next Radioactive Effluent Release Report pursuant to Section 12.6 why this inoperability was not corrected within the time specified.

Surveillance Requirements

12.2.1.B Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and DIGITAL and ANALOG CHANNEL OPERATIONAL TEST at the frequencies shown in Table 12.2-2.

Bases

12.2.1.C The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The Alarm/Trip Setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of RETS. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63, and 64 of Appendix A to 10CFR50.

TABLE 12.2-1

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

| | <u>INSTRUMENT</u> | <u>MINIMUM CHANNELS OPERABLE</u> | <u>ACTION</u> |
|----|---|----------------------------------|---------------|
| 1. | Radioactivity Monitors Providing Alarm and Automatic Termination of Release | | |
| a. | Liquid Radwaste Effluent Line (0RE-PR001) | 1 | 31 |
| b. | Fire and Oil Sump (0RE-PR005) | 1 | 34 |
| c. | Condensate Polisher Sump Discharge (0RE-PR041) | 1 | 34 |
| 2. | Radioactivity Monitors Providing Alarm But Not Providing Automatic Termination of Release | | |
| a. | Essential Service Water | | |
| | 1) Unit 1 | | |
| | a) RCFC 1A and 1C Outlet (1RE-PR002) | 1 | 32 |
| | b) RCFC 1B and 1D Outlet (1RE-PR003) | 1 | 32 |
| | 2) Unit 2 | | |
| | a) RCFC 2A and 2C Outlet (2RE-PR002) | 1 | 32 |
| | b) RCFC 2B and 2D Outlet (2RE-PR003) | 1 | 32 |
| b. | Station Blowdown Line (0RE-PR010) | 1 | 32 |
| 3. | Flow Rate Measurement Devices | | |
| a. | Liquid Radwaste Effluent Line (Loop-WX001) | 1 | 33 |
| b. | Liquid Radwaste Effluent Low Flow Line (Loop-WX630) | 1 | 33 |
| c. | Station Blowdown Line (Loop-CW032) | 1 | 33 |

TABLE 12.2-1 (Continued)RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATIONACTION STATEMENTS

- *ACTION 31 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 14 days provided that prior to initiating a release:
- a. At least two independent samples are analyzed in accordance with Section 12.3 and
 - b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge line valving.
- If a and b can not be met, suspend releases of radioactive effluents via this pathway.
- *ACTION 32 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided that, at least once per 12 hours, grab samples are collected and analyzed for principal gamma emitters and I-131 at a lower limit of detection as specified in Table 12.3-1.
- *ACTION 33 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours during actual releases. Pump performance curves generated in place may be used to estimate flow.
- *ACTION 34 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are analyzed for principal gamma emitters and I-131 at a lower limit of detection as specified in Table 12.3-1:
- a. At least once per 12 hours when the specific activity of the secondary coolant is greater than 0.01 microCurie/gram DOSE EQUIVALENT I-131,
- OR
- b. At least once per 24 hours when the specific activity of the secondary coolant is less than or equal to 0.01 microCurie/gram DOSE EQUIVALENT I-131.
- * If effluent releases continue via this pathway beyond the time specified, continue to perform actions and explain in the next Radioactive Effluent Report why the time specified was exceeded.

TABLE 12.2-2
RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

| <u>INSTRUMENT</u> | <u>CHANNEL CHECK</u> | <u>SOURCE CHECK</u> | <u>CHANNEL CALIBRATION</u> | <u>DIGITAL CHANNEL OPERATIONAL TEST</u> | <u>ANALOG CHANNEL OPERATIONAL TEST</u> |
|--|----------------------|---------------------|----------------------------|---|--|
| 1. Radioactivity Monitors Providing Alarm and Automatic Termination of Release | | | | | |
| a. Liquid Radwaste Effluent Line (0RE-PR001) | D | P | R(3) | Q(1) | N.A. |
| b. Fire and Oil Sump Discharge (0RE-PR005) | D | M | R(3) | Q(1) | N.A. |
| c. Condensate Polisher Sump Discharge (0RE-PR041) | D | M | R(3) | Q(1)* | N.A. |
| 2. Radioactivity Monitors Providing Alarm But Not Providing Automatic Termination of Release | | | | | |
| a. Essential Service Water | | | | | |
| 1) Unit 1 | | | | | |
| a) RCFC 1A and 1C Outlet (1RE-PR002) | D | M | R(3) | Q(2) | N.A. |
| b) RCFC 1B and 1D Outlet (1RE-PR003) | D | M | R(3) | Q(2) | N.A. |
| 2) Unit 2 | | | | | |
| a) RCFC 2A and 2C Outlet (2RE-PR002) | D | M | R(3) | Q(2) | N.A. |
| b) RCFC 2B and 2D Outlet (2RE-PR003) | D | M | R(3) | Q(2) | N.A. |
| b. Station Blowdown Line (0RE-PR010) | D | M | R(3) | Q(2) | N.A. |
| 3. Flow Rate Measurement Devices | | | | | |
| a. Liquid Radwaste Effluent Line (Loop-WX001) | D(4) | N.A. | R | N.A. | Q |
| b. Liquid Radwaste Effluent Low Flow Line (Loop-WX630) | D(4) | N.A. | R | N.A. | Q |
| c. Station Blowdown Line (Loop-CW032) | D(4) | N.A. | R | N.A. | Q |

TABLE 12.2-2 (Continued)RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE
REQUIREMENTSTABLE NOTATIONS

- (1) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
- a. Instrument indicates measured levels above the Alarm/Trip Setpoint, OR
 - b. Circuit failure (monitor loss of communications - alarm only, detector loss of counts, or monitor loss of power), OR
 - c. Detector check source test failure, OR
 - d. Detector channel out-of-service, OR
 - * e. Monitor loss of sample flow. This is only applicable for ORE-PR001 and ORE-PR005. (Monitor ORE-PR041 will not trip on loss of sample flow).
- (2) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
- a. Instrument indicates measured levels above the Alarm Setpoint, OR
 - b. Circuit failure (monitor loss of communications - alarm only, detector loss of counts, or monitor loss of power), OR
 - c. Detector check source test failure, OR
 - d. Detector channel out-of-service, OR
 - e. Monitor loss of sample flow.
- (3) The Initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Institute of Standards and Technology (NIST) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NIST. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.
- (4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

12.2.2 Radioactive Gaseous Effluent Monitoring Instrumentation

Operability Requirements

12.2.2.A The radioactive gaseous effluent monitoring instrumentation channels shown in Table 12.2-3 shall be OPERABLE with their Alarm/Trip Setpoints set to ensure that the limits of Section 12.4 are not exceeded. The Alarm/Trip Setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

Applicability: As shown in Table 12.2-3

Action:

1. With a radioactive gaseous effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above section, immediately suspend the release of radioactive gaseous effluents monitored by the affected channel, or declare the channel inoperable.
2. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 12.2-3. Restore the inoperable instrumentation to OPERABLE status within the time specified in the ACTION, or explain in the next Annual Radioactive Effluent Release Report pursuant to Section 12.6 why this inoperability was not corrected within the time specified.

Surveillance Requirements

12.2.2.B Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and DIGITAL and CHANNEL OPERATIONAL TEST at the frequencies shown in Table 12.2-4.

Bases

12.2.2.C The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluents during actual or potential releases of gaseous effluents. The Alarm/Trip Setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of RETS. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63, and 64 of Appendix A to 10CFR50. The sensitivity of any noble gas activity monitor used to show compliance with the gaseous effluent release requirements of Section 12.4 shall be such that concentrations as low as 1×10^{-6} uCi/cc are measurable.

TABLE 12.2-3

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

| <u>INSTRUMENT</u> | <u>MINIMUM CHANNELS OPERABLE</u> | <u>APPLICABILITY</u> | <u>ACTION</u> |
|---|--------------------------------------|----------------------|---------------|
| 1. Plant Vent Monitoring System - Unit 1 | | | |
| a. Noble Gas Activity Monitor Providing Alarm | | | |
| 1) High Range (1RE-PR028D) | 1 | * | 39 |
| 2) Low Range (1RE-PR028B) | 1 | * | 39 |
| b. Iodine Sampler (1RE-PR028C) | 1 | * | 40 |
| c. Particulate Sampler (1RE-PR028A) | 1 | * | 40 |
| d. Effluent System Flow Rate Measuring Device (LOOP-VA019) | 1 | * | 36 |
| e. Sampler Flow Rate Measuring Device (1FT-PR165) | 1 | * | 36 |
| 2. Plant Vent Monitoring System - Unit 2 | | | |
| a. Noble Gas Activity Monitor Providing Alarm | | | |
| 1) High Range (2RE-PR028D) | 1 | * | 39 |
| 2) Low Range (2RE-PR028B) | 1 | * | 39 |
| b. Iodine Sampler (2RE-PR028C) | 1 | * | 40 |
| c. Particulate Sampler (2RE-PR028A) | 1 | * | 40 |
| d. Effluent System Flow Rate Measuring Device (LOOP-VA020) | 1 | * | 36 |
| e. Sampler Flow Rate Measuring Device (2FT-PR165) | 1 | * | 36 |

TABLE 12.2-3 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

| | <u>INSTRUMENT</u> | <u>MINIMUM CHANNELS OPERABLE</u> | <u>APPLICABILITY</u> | <u>ACTION</u> |
|----|--|--------------------------------------|----------------------|---------------|
| 3. | Not Used. | | | |
| 4. | Gas Decay Tank System | | | |
| | a. Noble Gas Activity Monitor- Providing Alarm and Automatic Termination of Release (ORE-PR002A and 2B) | 2 | * | 35 |
| 5. | Containment Purge System | | | |
| | a. Noble Gas Activity Monitor- Providing Alarm (RE-PR001B) | 1 | * | 37 |
| | b. Iodine Sampler (RE-PR001C) | 1 | * | 40 |
| | c. Particulate Sampler (RE-PR001A) | 1 | * | 40 |
| 6. | Radioactivity Monitors Providing Alarm and Automatic Closure of Surge Tank Vent-Component Cooling Water Line (ORE-PR009 and RE-PR009) | 2 | * | 41 |

TABLE 12.2-3 (Continued)RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATIONTABLE NOTATIONS

*At all times.

- **ACTION 35 -** With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank(s) may be released to the environment for up to 14 days provided that prior to initiating the release:
- a. At least two independent samples of the tank's contents are analyzed, and
 - b. At least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup.
- If a and b can not be met, suspend releases of radioactive effluents via this pathway.
- **ACTION 36 -** With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided the flow rate is estimated at least once per 4 hours.
- **ACTION 37 -** With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, immediately suspend PURGING of radioactive effluents via this pathway. Releases may continue via this pathway for up to 7 days provided real time monitoring of radioactive effluents released via this pathway is established.
- **ACTION 38 -** Not used.
- **ACTION 39 -** With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided grab samples are taken at least once per 12 hours and these samples are analyzed for principle gamma emitters at an LLD as specified in Table 12.4-1.
- **ACTION 40 -** With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the affected pathway may continue for up to 30 days provided samples are continuously collected with auxiliary sampling equipment as required in Table 12.4-1.
- **ACTION 41 -** With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue for up to 30 days provided that, at least once per 12 hours, liquid grab samples are collected and analyzed for radioactivity at a lower limit of detection as specified in Table 12.3-1.

****** If effluent releases continue via this pathway beyond the time specified, continue to perform actions and explain in the next Radioactive Effluent Report why the time specified was exceeded.

TABLE 12.2-4

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

| <u>FUNCTIONAL UNIT</u> | <u>CHANNEL CHECK</u> | <u>SOURCE CHECK</u> | <u>CHANNEL CALIBRATION</u> | <u>DIGITAL CHANNEL OPERATIONAL TEST</u> | <u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u> |
|--|----------------------|---------------------|----------------------------|---|---|
| 1. Plant Vent Monitoring System - Unit 1 | | | | | |
| a. Noble Gas Activity Monitor-Providing Alarm | | | | | |
| 1) High Range (1RE-PR028D) | D | M | R(3) | Q(2) | * |
| 2) Low Range (1RE-PR028B) | D | M | R(3) | Q(2) | * |
| b. Iodine Sampler (1RE-PR028C) | D | M | R(3) | Q(2) | * |
| c. Particulate Sampler (1RE-PR028A) | D | M | R(3) | Q(2) | * |
| d. Effluent System Flow Rate Measuring Device (LOOP-VA019) | D | N.A. | R | Q | * |
| e. Sampler Flow Rate Measuring Device (1FT-PR165) | D | N.A. | R | Q | * |
| 2. Plant Vent Monitoring System - Unit 2 | | | | | |
| a. Noble Gas Activity Monitor-Providing Alarm | | | | | |
| 1) High Range (2RE-PR028D) | D | M | R(3) | Q(2) | * |
| 2) Low Range (2RE-PR028B) | D | M | R(3) | Q(2) | * |
| b. Iodine Sampler (2RE-PR028C) | D | M | R(3) | Q(2) | * |

TABLE 12.2-4 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

| <u>FUNCTIONAL UNIT</u> | <u>CHANNEL CHECK</u> | <u>SOURCE CHECK</u> | <u>CHANNEL CALIBRATION</u> | <u>DIGITAL CHANNEL OPERATIONAL TEST</u> | <u>MODES FOR WHICH SURVEILLANCE IS REQUIRED</u> |
|---|----------------------|---------------------|----------------------------|---|---|
| 2. Plant Vent Monitoring System - Unit 2 (Continued) | | | | | |
| c. Particulate Sampler (2RE-PR028C) | D | M | R(3) | Q(2) | * |
| d. Effluent System Flow Rate Measuring Device (LOOP-VA020) | D | N.A. | R | Q | * |
| e. Sampler Flow Rate Measuring Device (2FT-PR165) | D | N.A. | R | Q | * |
| 3. Not Used | | | | | |
| 4. Gas Decay Tank System | | | | | |
| a. Noble Gas Activity Monitor Providing Alarm and Automatic Termination of Release (0RE-PR002A and 2B) | P | P | R(3) | Q(1)** | * |
| 5. Containment Purge System | | | | | |
| a. Noble Gas Activity Monitor-Providing Alarm (RE-PR001B) | D | P | R(3) | Q(2) | * |
| b. Iodine Sampler (RE-PR001C) | P | P | R(3) | N.A. | * |
| c. Particulate Sampler (RE-PR001A) | P | P | R(3) | N.A. | * |
| 6. Radioactivity Monitors Providing Alarm and Automatic Closure of Surge Tank Vent-Component Cooling Water Line (0RE-PR009 and RE-PR009) | | | | | |
| | D | M | R(3) | Q(1) | * |

TABLE 12.2-4 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
SURVEILLANCE REQUIREMENTSTABLE NOTATIONS

- * At all times.
- (1) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
- a. Instrument indicates measured levels above the Alarm/Trip Setpoint, OR
 - b. Circuit failure (monitor loss of communications - alarm only, detector loss of counts, or monitor loss of power), OR
 - c. Detector check source test failure, OR
 - d. Detector channel out-of-service, OR
- ** e. Monitor loss of sample flow. Monitoring ORE-PR002A and 2B will not trip on loss of sample flow.
- (2) The DIGITAL CHANNEL OPERATIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
- a. Instrument indicates measured levels above the Alarm Setpoint, OR
 - b. Circuit failure (monitor loss of communications - alarm only, detector loss of counts, or monitor loss of power), OR
 - c. Detector check source test failure, OR
 - d. Detector channel out-of-service, OR
 - e. Monitor loss of sample flow.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Institute of Standards and Technology (NIST) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NIST. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.
- (4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

12.3 LIQUID EFFLUENTS12.3.1 ConcentrationOperability Requirements

12.3.1.A The concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS (see Braidwood Station ODCM Annex, Appendix F, Figure F-1) shall be limited to 10 times the concentration values in Appendix B, Table 2, Column 2 to 10CFR20.1001-20.2402, for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 2×10^{-4} microCurie/ml total activity.

Applicability: At all times

Action:

1. With the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS exceeding the above limits, immediately restore the concentration to within the above limits.

Surveillance Requirements

12.3.1.B.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 12.3-1.

12.3.1.B.2 The results of the radioactivity analysis shall be used in accordance with the methodology and parameters in the ODCM to assure that the concentrations at the point of release are maintained within the limits of 12.3.1.A.

Bases

12.3.1.C This section is provided to ensure that the concentration of radioactive materials released in liquid waste effluents to UNRESTRICTED AREAS will be less than 10 times the concentration values in Appendix B, Table 2, Column 2 to 10CFR20.1001-20.2402. This limitation provides additional assurance that the levels of radioactive materials in bodies of water in UNRESTRICTED AREAS will result in exposures within: (1) the Section II.A design objectives of Appendix I, 10CFR50, to a MEMBER OF THE PUBLIC, and (2) the limits of 10CFR20.1301.

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

12.3 LIQUID EFFLUENTS (Continued)Bases

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

TABLE 12.3-1

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

| LIQUID RELEASE TYPE | SAMPLING FREQUENCY | MINIMUM ANALYSIS FREQUENCY | TYPE OF ACTIVITY ANALYSIS | LOWER LIMIT OF DETECTION (LLD) ⁽¹⁾ ($\mu\text{Ci/ml}$) |
|---|---------------------------|-------------------------------|---|--|
| 1. Batch Release Tanks ⁽²⁾ | P Each Batch | P Each Batch | Principal Gamma Emitters ⁽⁷⁾ | 5×10^{-7} |
| | | | I-131 | 1×10^{-6} |
| | P One Batch/M | M | Dissolved and Entrained Gases (Gamma Emitters) ⁽⁷⁾ | 1×10^{-5} |
| | P Each Batch | M Composite ⁽⁵⁾ | H-3 | 1×10^{-5} |
| | P Each Batch | Q Composite ⁽⁵⁾ | Gross Alpha | 1×10^{-7} |
| | | | Sr-89, Sr-90 | 5×10^{-8} |
| 2. Continuous Releases ⁽⁴⁾ | Continuous ⁽⁵⁾ | W Composite ⁽⁵⁾ | Principal Gamma Emitters ⁽⁷⁾ | 5×10^{-7} |
| | | | I-131 | 1×10^{-6} |
| a. Circulating Water Blowdown | M Grab Sample | M | Dissolved and Entrained Gases (Gamma Emitters) ⁽⁷⁾ | 1×10^{-5} |
| b. Waste Water Treatment Discharge to Circulating Water Discharge | Continuous ⁽⁵⁾ | M Composite ⁽⁵⁾ | H-3 | 1×10^{-5} |
| | | | Gross Alpha | 1×10^{-7} |
| c. Condensate Polisher Sump Discharge | Continuous ⁽⁵⁾ | Q Composite ⁽⁵⁾ | Sr-89, Sr-90 | 5×10^{-8} |
| | | | Fe-55 | 1×10^{-6} |

TABLE 12.3-1 (Continued)

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

| LIQUID RELEASE TYPE | SAMPLING FREQUENCY | MINIMUM ANALYSIS FREQUENCY | TYPE OF ACTIVITY ANALYSIS | LOWER LIMIT OF DETECTION (LLD) ⁽¹⁾ (μ Ci/ml) |
|---|---------------------------------|----------------------------|---|--|
| 3. Continuous Release ⁽⁴⁾ Essential Service Water Reactor Containment Fan Cooler (RCFC) Outlet Line | W ⁽⁶⁾ Grab Sample | W ⁽⁶⁾ | Principal Gamma Emitters ⁽⁷⁾ | 5x10 ⁻⁷ |
| | | | I-131 | 1x10 ⁻⁶ |
| | | | H-3 | 1x10 ⁻⁵ |
| | | M ⁽⁶⁾ | Dissolved and Entrained Gases (Gamma Emitters) ⁽⁷⁾ | 1x10 ⁻⁵ |
| 4. Continuous Surge Tank Vent-Component Cooling Water Line ⁽⁸⁾ | None | None | Principal Gamma Emitters ⁽⁷⁾ | 5x10 ⁻⁷ |
| | | | Dissolved and Entrained Gases (Gamma Emitters) ⁽⁷⁾ | 1x10 ⁻⁵ |
| | | | I-131 | 1x10 ⁻⁶ |

TABLE 12.3-1 (Continued)RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAMTABLE NOTATIONS

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

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

$$LLD = \frac{4.66s_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD = the lower limit of detection (microCuries per unit mass or volume),

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

E = the counting efficiency (counts per disintegration),

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

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

Y = the fractional radiochemical yield, when applicable,

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

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

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

Alternative LLD Methodology

An alternative methodology for LLD determination follows and is similar to the above LLD equation:

$$LLD = \frac{(2.71 + 4.65\sqrt{B}) \cdot \text{Decay}}{E \cdot V \cdot Y \cdot t \cdot (2.22 \times 10^6)}$$

TABLE 12.3-1 (Continued)

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAMTABLE NOTATIONS

Where:

B = background sum (counts)

E = counting efficiency, (counts detected/disintegration's)

q = sample quantity, (mass or volume)

b = abundance, (if applicable)

Y = fractional radiochemical yield or collection efficiency, (if applicable)

t = count time (minutes)

 2.22×10^6 = number of disintegration's per minute per microCurie $2.71 + 4.65\sqrt{B} = k^2 + (2k \sqrt{2} \sqrt{B})$, and $k = 1.645$.

(k=value of the t statistic from the single-tailed t distribution at a significance level of 0.95 and infinite degrees of freedom. This means that the LLD result represents a 95% detection probability with a 5% probability of falsely concluding that the nuclide present when it is not or that the nuclide is not present when it is.)

Decay = $e^{-\lambda t} [\lambda RT / (1 - e^{-\lambda RT})] [\lambda T_d / (1 - e^{-\lambda T_d})]$, (if applicable) λ = radioactive decay constant, (units consistent with Δt , RT and T_d) Δt = "delta t", or the elapsed time between sample collection or the midpoint of sample collection and the time the count is started, depending on the type of sample, (units consistent with λ)RT = elapsed real time, or the duration of the sample count, (units consistent with λ) T_d = sample deposition time, or the duration of analyte collection onto the sample media, (units consistent with λ)

The LLD may be determined using installed radioanalytical software, if available. In addition to determining the correct number of channels over which to total the background sum, utilizing the software's ability to perform decay corrections (i.e. during sample collection, from sample collection to start of analysis and during counting), this alternate method will result in a more accurate determination of the LLD.

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

TABLE 12.3-1 (Continued)RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAMTABLE NOTATIONS

- (2) A batch release is the discharge of liquid wastes of a discrete volume. Prior to sampling for analyses, each batch shall be isolated, and then thoroughly mixed to assure representative sampling.
- (3) A composite sample is one in which the quantity of liquid sampled is proportional to the quantity of liquid waste discharged and in which the method of sampling employed results in a specimen that is representative of the liquids released.
- (4) A continuous release is the discharge of liquid wastes of a nondiscrete volume, e.g., from a volume of a system that has an input flow during the continuous release.
- (5) To be representative of the quantities and concentrations of radioactive materials in liquid effluents, samples shall be collected continuously whenever the effluent stream is flowing. Prior to analyses, all samples taken for the composite shall be thoroughly mixed in order for the composite sample to be representative of the effluent release.
- (6) Not required unless the Essential Service Water RCFC Outlet Radiation Monitors RE-PR002 and RE-PR003 indicates measured levels greater than 1×10^{-6} $\mu\text{Ci/ml}$ above background at any time during the week.
- (7) The principal gamma emitters for which the LLD specification applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for dissolved and entrained for principal gamma emitters. This list does not mean that only these nuclides are to be considered.

Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Radioactive Effluent Release Report pursuant to Section 12.6.2, in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.
- (8) A continuous release is the discharge of dissolved and entrained gaseous waste from a nondiscrete liquid volume.

12.3.2 DoseOperability Requirements

12.3.2.A The dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each unit, to UNRESTRICTED AREAS (see Braidwood Station ODCM Annex, Appendix F, Figure F-1) shall be limited:

1. During any calendar quarter to less than or equal to 1.5 mrem to the whole body and to less than or equal to 5 mrem to any organ, and
2. During any calendar year to less than or equal to 3 mrem to the whole body and to less than or equal to 10 mrem to any organ.

Applicability: At all times.

Action:

1. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to 10CFR50 Appendix I, Section IV.A, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

Surveillance Requirements

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

Bases

12.3.2.C This section is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10CFR50. The Operability Requirements implement the guides set forth in Section II.A of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in liquid effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably achievable." The dose calculation methodology and parameters in the ODCM implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated.

The equations specified in the ODCM for calculating the doses due to the actual release rates of radioactive materials in liquid effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man From Routine Releases of Reactor Effluents For the Purpose of Evaluating Compliance with 10CFR50, Appendix I" Revision 1, October 1977 and Regulatory Guide 1.113, "Estimating Aquatic Dispersion of Effluents from Accidental and Routine Reactor Releases for the Purpose of Implementing Appendix I," April 1977.

12.3.2 Dose (Continued)Bases

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

12.3.3 Liquid Radwaste Treatment System

Operability Requirements

12.3.3.A The Liquid Radwaste Treatment System shall be OPERABLE and appropriate portions of the system shall be used to reduce releases of radioactivity when the projected doses due to the liquid effluent, from each unit, to UNRESTRICTED AREAS (see Braidwood Station ODCM Annex, Appendix F, Figure F-1) would exceed 0.06 mrem to the whole body or 0.2 mrem to any organ in a 31-day period.

Applicability: At all times.

Action:

1. With radioactive liquid waste being discharged without treatment and in excess of the above limits and any portion of the Liquid Radwaste Treatment System not in operation, prepare and submit to the Commission within 30 days, pursuant to 10CFR50 Appendix I, Section IV.A, a Special Report that includes the following information:
 - a. Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - b. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 - c. Summary description of action(s) taken to prevent a recurrence.

Surveillance Requirements

- 12.3.3.B.1 Doses due to liquid releases from each unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when the Liquid Radwaste Treatment System is not being fully utilized.
- 12.3.3.B.2 The installed Liquid Radwaste Treatment System shall be considered OPERABLE by meeting Sections 12.3.1.A and 12.3.2.A.

Bases

12.3.3.C The OPERABILITY of the Liquid Radwaste Treatment System ensures that this system will be available for use whenever liquid effluents require treatment prior to release to the environment. The requirement that the appropriate portions of this system be used when specified provides assurance that the releases of radioactive materials in liquid effluents will be kept "as low as is reasonably achievable". This section implements the requirements of 10CFR50.36a, General Design Criterion 60 of Appendix A to 10CFR50 and the design objective given in Section II.D of Appendix I to 10CFR50.

12.3.3 Liquid Radwaste Treatment System (Continued)**Bases**

The specified limits governing the use of appropriate portions of the Liquid Radwaste Treatment System were specified as a suitable fraction of the dose design objectives set forth in Section II.A of Appendix I, 10CFR50, for liquid effluents.

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

12.4 GASEOUS EFFLUENTS12.4.1 Dose RateOperability Requirements

12.4.1.A The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Braidwood Station ODCM Annex, Appendix F, Figure F-1) shall be limited to the following:

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

Applicability: At all times.

Action:

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

Surveillance Requirements

12.4.1.B.1 The dose rate due to noble gases in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM.

12.4.1.B.2 The dose rate due to Iodine 131 and 133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 12.4-1.

Bases

12.4.1.C This section is provided to ensure that the dose at any time at and beyond the SITE BOUNDARY from gaseous effluents from all units on the site will be within the annual dose limits of 10CFR20. These limits provide reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC exceeding the limits specified in 10CFR20.1301.

12.4 GASEOUS EFFLUENTS (Continued)Bases

For MEMBERS OF THE PUBLIC who may at times be within the SITE BOUNDARY, the occupancy of that MEMBER OF THE PUBLIC will usually be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the SITE BOUNDARY. Examples of calculations for such MEMBERS OF THE PUBLIC, with the appropriate occupancy factors, shall be given in the ODCM. The specified release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to a MEMBER OF THE PUBLIC at or beyond the SITE BOUNDARY to less than or equal to 500 mrems/year to the whole body or to less than or equal to 3000 mrems/year to the skin. These release rate limits also restrict, at all times the corresponding thyroid dose rate above background via the inhalation pathway to less than or equal to 1500 mrems/year.

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

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

TABLE 12.4-1

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

| GASEOUS RELEASE TYPE | SAMPLING FREQUENCY | MINIMUM ANALYSIS FREQUENCY | TYPE OF ACTIVITY ANALYSIS | LOWER LIMIT OF DETECTION (LLD) ⁽¹⁾ ($\mu\text{Ci/cc}$) |
|--|---|--|---|---|
| 1. Waste Gas Decay Tank | P Each Tank Grab Sample | P Each Tank | Principal Gamma Emitters ⁽²⁾ | 1×10^{-4} |
| 2. Containment Purge | P Each Purge ⁽³⁾ Grab Sample | P Each Purge ⁽³⁾ | Principal Gamma Emitters ⁽²⁾ | 1×10^{-4} |
| | | | H-3 | 1×10^{-7} |
| 3. Auxiliary Bldg. Vent Stack (Unit 1 and 2) | M ⁽⁴⁾⁽⁵⁾ Grab Sample | M | Principal Gamma Emitters ⁽²⁾ | 1×10^{-4} |
| | | | H-3 | 1×10^{-7} |
| | Continuous ⁽⁶⁾ | W ⁽⁷⁾ Charcoal Sample | I-131 | 1×10^{-12} |
| | | | I-133 | 1×10^{-10} |
| | Continuous ⁽⁶⁾ | W ⁽⁷⁾ Particulate Sample | Principal Gamma Emitters ⁽²⁾ | 1×10^{-11} |
| | Continuous ⁽⁶⁾ | Q Composite Particulate Sample | Gross Alpha | 1×10^{-11} |
| | Continuous ⁽⁶⁾ | Q Composite Particulate Sample | Sr-89, Sr-90 | 1×10^{-11} |
| | Continuous | N.A. Noble Gas Monitor | Noble Gases, Gross Beta or Gamma | 1×10^{-6} |

TABLE 12.4-1 (Continued)

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

TABLE NOTATIONS

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

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

$$LLD = \frac{4.66S_b}{E \cdot V \cdot 2.22 \times 10^6 \cdot Y \cdot \exp(-\lambda \Delta t)}$$

Where:

LLD = the lower limit of detection (microCuries per unit mass or volume),

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

E = the counting efficiency (counts per disintegration),

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

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

Y = the fractional radiochemical yield, when applicable,

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

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

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

Alternate LLD Methodology

An alternate methodology for LLD determination follows and is similar to the above LLD equation:

$$LLD = \frac{(2.71 + 4.65\sqrt{B}) \cdot \text{Decay}}{E \cdot V \cdot Y \cdot t \cdot (2.22 \times 10^6)}$$

TABLE 12.4-1 (Continued)RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAMTABLE NOTATIONS

Where:

B = background sum (counts)

E = counting efficiency, (counts detected/disintegrations)

q = sample quantity, (mass or volume)

b = abundance, (if applicable)

Y = fractional radiochemical yield or collection efficiency, (if applicable)

t = count time (minutes)

2.22 X10⁶ = number of disintegrations per minute per microCurie(2.71 + 4.65√B) = k² + (2k √ 2 √ B), and k = 1.645.

(k=value of the t statistic from the single-tailed t distribution at a significance level of 0.95 and infinite degrees of freedom. This means that the LLD result represents a 95% detection probability with a 5% probability of falsely concluding that the nuclide present when it is not or that the nuclide is not present when it is.)

Decay = e^{-λΔt} [λRT/(1-e^{-λRT})] [λT_d/(1-e^{-λT_d})], (if applicable)λ = radioactive decay constant, (units consistent with Δt, RT and T_d)

Δt = "delta t", or the elapsed time between sample collection or the midpoint of sample collection and the time the count is started, depending on the type of sample, (units consistent with λ)

RT = elapsed real time, or the duration of the sample count, (units consistent with λ)

T_d = sample deposition time, or the duration of analyte collection onto the sample media, (unit consistent with λ)

The LLD may be determined using installed radioanalytical software, if available. In addition to determining the correct number of channels over which to total the background sum, utilizing the software's ability to perform decay corrections (i.e. during sample collection, from sample collection to start of analysis and during counting), this alternate method will result in a more accurate determination of the LLD.

It should be recognized that the LLD is defined as a before the fact limit and not as an after the fact limit for a particular measurement.

TABLE 12.4-1 (Continued)RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAMTABLE NOTATIONS

- (2) The principal gamma emitters for which the LLD specification applies include the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 in noble gas releases and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141, and Ce-144 in particulate releases. This list does not mean that only these nuclides are to be considered.
- Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Radioactive Effluent Release Report pursuant to Section 12.6.2, in the format outlined in Regulatory Guide 1.21, Appendix B, Revision 1, June 1974.
- (3) Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period.
- (4) Tritium grab samples shall be taken at least once per 24 hours when the refueling canal is flooded.
- (5) Tritium grab samples shall be taken at least once per 7 days from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.
- (6) The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Sections 12.4.1.A, 12.4.2.A and 12.4.3.A.
- (7) Samples shall be changed at least once per 7 days and analyses shall be completed within a timeframe necessary to meet the applicable lower limits of detection, but not to exceed 48 hours. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period and analyses shall be completed within a timeframe necessary to meet the applicable lower limits of detection, but not to exceed 48 hours. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does not apply if: (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the reactor coolant has not increased more than a factor of 3, and (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.

12.4.2 Dose - Noble GasesOperability Requirements

12.4.2.A The air dose due to noble gases released in gaseous effluents, from each unit, to areas at and beyond the SITE BOUNDARY (see Braidwood Station ODCM Annex, Appendix F, Figure F-1) shall be limited to the following:

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

Applicability: At all times.

Action:

1. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to 10CFR50 Appendix I, Section IV.A, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

Surveillance Requirements

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

Bases

12.4.2.C This section is provided to implement the requirements of Sections II.B, III.A and IV.A of Appendix I, 10CFR50. The Operability Requirements implement the guides set forth in Section II.B of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents to area at or beyond the SITE BOUNDARY will be kept "as low as is reasonable achievable." The Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated.

12.4.2 Dose - Noble Gases (Continued)Bases

The dose calculation methodology and parameters established in the ODCM for calculating the doses due to the actual release rates of radioactive materials in gaseous effluents are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man From Routine Releases of Reactor Effluents For the Purpose of Evaluating Compliance with 10CFR50, Appendix I" Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors, Revision 1," July 1977. The ODCM equations provided for determining the air doses at and beyond the SITE BOUNDARY are based upon the historical average atmospheric conditions.

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

12.4.3 Dose - Iodine I-131 and 133, Tritium, and Radioactive Material in Particulate Form**Operability Requirements**

12.4.3.A The dose to a MEMBER OF THE PUBLIC from Iodine-131 and 133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each unit, to areas at and beyond the SITE BOUNDARY (see Braidwood Station ODCM Annex, Appendix F, Figure F-1) shall be limited to the following:

1. During any calendar quarter: Less than or equal to 7.5 mremS to any organ, and
2. During any calendar year: Less than or equal to 15 mremS to any organ.

Applicability: At all times.

Action:

1. With the calculated dose from the release of Iodine-131 and 133, tritium, and radionuclides in particulate form with half-lives greater than 8 days, in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to 10CFR50 Appendix I, Section IV.A, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.

Surveillance Requirements

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

Bases

12.4.3.C This section is provided to implement the requirements of Sections II.C, III.A and IV.A of Appendix I, 10CFR50. The Operability Requirements are the guides set forth in Section II.C of Appendix I. The ACTION statements provide the required operating flexibility and at the same time implement the guides set forth in Section IV.A of Appendix I to assure that the releases of radioactive material in gaseous effluents to areas at or beyond the SITE BOUNDARY will be kept "as low as is reasonable achievable." The ODCM calculational methods specified in the Surveillance Requirements implement the requirements in Section III.A of Appendix I that conformance with the guides of Appendix I be shown by calculational procedures based on models and data, such that the actual exposure of a MEMBER OF THE PUBLIC through appropriate pathways is unlikely to be substantially underestimated.

12.4.3 Dose (Continued)Bases

The ODCM calculational methodology and parameters for calculating the doses due to the actual release rates of the subject materials are consistent with the methodology provided in Regulatory Guide 1.109, "Calculation of Annual Doses to Man From Routine Releases of Reactor Effluents For the Purpose of Evaluating Compliance with 10CFR50, Appendix I" Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water-Cooled Reactors," Revision 1, July 1977. These equations also provide for determining the actual doses based upon the historical average atmospheric conditions. The release rate specifications for Iodine-131 and 133, tritium, and radionuclides in particulate form with half-lives greater than 8 days are dependent upon the existing radionuclide pathways to man, in the areas at and beyond the SITE BOUNDARY. The pathways that were examined in the development of these calculations were: (1) individual inhalation of airborne radionuclides, (2) deposition of radionuclides onto green leafy vegetation with subsequent consumption by man, (3) deposition onto grassy areas where milk animals and meat producing animal's graze with consumption of the milk and meat by man, and (4) deposition on the ground with subsequent exposure to man.

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

12.4.4 Gaseous Radwaste Treatment System**Operability Requirements**

12.4.4.A The VENTILATION EXHAUST TREATMENT SYSTEM and the WASTE GAS HOLDUP SYSTEM shall be OPERABLE and appropriate portions of these systems shall be used to reduce releases of radioactivity when the projected doses in 31 days due to gaseous effluent releases, from each unit, to areas at and beyond the SITE BOUNDARY (see Braidwood Station ODCM Annex, Appendix F, Figure F-1) would exceed:

1. 0.2 mrad to air from gamma radiation, or
2. 0.4 mrad to air from beta radiation, or
3. 0.3 mrem to any organ of a MEMBER OF THE PUBLIC.

Applicability: At all times.

Action:

1. With radioactive gaseous waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, pursuant to 10CFR50 Appendix I, Section IV.A, a Special Report that includes the following information:
 - a. Identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - b. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 - c. Summary description of action(s) taken to prevent a recurrence.

Surveillance Requirements

12.4.4.B.1 Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when Gaseous Radwaste Treatment Systems are not being fully utilized.

12.4.4.B.2 The installed VENTILATION EXHAUST TREATMENT SYSTEM and WASTE GAS HOLDUP SYSTEM shall be considered OPERABLE by meeting Section 12.4.1 or 12.4.2 and 12.4.3.

Bases

12.4.4.C The OPERABILITY of the WASTE GAS HOLDUP SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM ensures that the system will be available for use whenever gaseous effluents require treatment prior to release to the environment.

12.4.4 Gaseous Radwaste Treatment System (Continued)Bases

The requirement that the appropriate portions of this system be used when specified provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as is reasonably achievable". This section implements the requirements of 10CFR50.36a, General Design Criterion 60 of Appendix A to 10CFR50 and the design objective given in Section II.D of Appendix I to 10CFR50. The specified limits governing the use of appropriate portions of the Gaseous Radwaste Treatment System were specified as a 2% fraction of the dose design objectives set forth in Section II.B and II.C of Appendix I, 10CFR50, for gaseous effluents.

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

12.4.5 Total Dose**Operability Requirements**

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

Applicability: At all times.

Action:

1. With the calculated doses from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Sections 12.3.2, 12.4.2, or 12.4.3, calculations should be made including direct radiation contributions from the units and from outside storage tanks to determine whether the above limits of Section 12.4.5.A have been exceeded. If such is the case, prepare and submit to the Commission within 30 days, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10CFR20.2203, shall include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentration of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40CFR190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40CFR190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

Surveillance Requirements

- 12.4.5.B.1 Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Sections 12.3.2, 12.4.2, and 12.4.3, and in accordance with the methodology and parameters in the ODCM.
- 12.4.5.B.2 Cumulative dose contributions from direct radiation from the units and from radwaste storage tanks shall be determined in accordance with the methodology and parameters in the ODCM. This requirement is applicable only under conditions set forth in ACTION 1 of Section 12.4.5.A.
- 12.4.5.B.3 Initial estimates of expected dose rates at the Old Steam Generator Storage Facility (OSGSF) are provided through calculations. After the old steam generators are placed in the facility and the equipment opening is sealed, a radiation survey of the walls and roof will be performed. The measured dose rates will be used for comparison to the calculated dose rates and to confirm or adjust the initial estimates for use in 10CFR20, 10CFR50 Appendix I, and 40CFR190 compliance determinations.

12.4.5 Total Dose (Continued)Surveillance Requirements

Environmental TLDs are located near the OSGSF. The TLDs are processed quarterly to determine the dose at the locations for use in compliance determinations.

Quarterly monitoring of the sump for indications of liquid is performed and, if liquid is present and seepage appears to have occurred, a sample will be taken and analyzed.

Bases

12.4.5.C.1 This section is provided to meet the dose limitations of 40CFR190 that have been incorporated into 10CFR20 by 46FR18525. The section requires the preparation and submittal of a Special Report whenever the calculated doses due to releases of radioactivity and to radiation from uranium fuel cycle sources exceed 25 mrems to the whole body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems. For sites containing up to four reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40CFR190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the reactor units and outside storage tanks are kept small. The Special Report will describe a course of action that should result in the limitation of the annual dose to a MEMBER OF THE PUBLIC to within the 40CFR190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the MEMBER OF THE PUBLIC from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any MEMBER OF THE PUBLIC is estimated to exceed the requirements of 40CFR190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40CFR190 have not already been corrected), in accordance with the provisions of 40CFR190.11 and 10CFR20.2203, is considered to be a timely request and fulfills the requirements of 40CFR190 until NRC staff action is completed. The variance only relates to the limits of 40CFR190, and does not apply in any way to the other requirements for dose limitation of 10CFR20, as addressed in Sections 12.3.1 and 12.4.1. An individual is not considered a MEMBER OF THE PUBLIC during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

12.4.5.C.2 The OSGSF was constructed to provide long-term storage of the four old steam generators removed from Braidwood Station Unit 1 during the Steam Generator Replacement Outage. The facility is designed to ensure that the dose rates at the wall and roof meet the limits of 10CFR20 (UFSAR Zone 1-A for the walls and Zone 1-B for the roof). The facility is also designed to ensure that the dose rates at the site boundary and to the nearest resident meet the limits of 10CFR20 and 40CFR190.

The OSGSF design includes 2'-6" thick concrete walls and 1'-6" inch thick concrete roof. Personnel access is through a labyrinth-style vestibule with a locked exterior door and a lockable sliding door for access beyond the vestibule to the interior of the facility. A water collection sump is provided with access from the vestibule for sampling water if liquid is present. The opening used for placement of the steam generators inside the facility will be sealed with concrete panels. The panels have a tongue and groove design to preclude radiation "shine" after installation.

12.4.5 Total Dose (Continued)Bases

The potential for radiological release from the OSGSF is also minimized by sealing openings in the steam generators caused by removed piping with welded structural cover plates or seal plugs. Trunnions installed during removal of the old steam generators from the containment and existing opening covers remain attached to the steam generators to ensure the penetrations are leaktight. External exposed surfaces of the steam generators are coated to seal and fix surface contamination to the steam generators.

12.4.6 Dose Limits for Members of the Public**Operability Requirements**

12.4.6.A The licensee shall conduct operations such that the TEDE to individual MEMBERS OF THE PUBLIC does not exceed 100 mrem in a year. In addition, the dose in any unrestricted area from external sources does not exceed 2 mrem in any one hour. The Effluents Program shall implement monitoring, sampling and analysis of radioactive liquid and gaseous effluents in accordance with 10CFR20.1302 and with the methodology and parameters in the ODCM.

Applicability: At all times.

Action:

1. If the calculated dose from the release or exposure of radiation meets or exceeds the 100 mrem/year limit for the MEMBER OF THE PUBLIC, prepare and submit a report the Commission in accordance with 10CFR20.2203.
2. If the dose in any unrestricted area from external sources of radiation meets or exceeds the 2 mrem in any one hour limit for the MEMBER OF THE PUBLIC, prepare and submit a report to the Commission in accordance with 10CFR20.2203.

Surveillance Requirements

12.4.6.B Calculate the TEDE to individual MEMBERS OF THE PUBLIC annually to determine compliance with the 100 mrem/year limit in accordance with the ODCM. In addition, evaluate and/or determine if direct radiation exposures exceed 2 mrem in any hour in unrestricted areas.

Bases

12.4.6.C This section applies to direct exposure of radioactive materials as well as radioactive materials released in gaseous and liquid effluents. 10CFR20.1301 sets forth the 100 mrem/year dose limit to members of the public; 2 mrem in any one hour limit in the unrestricted area; and reiterates that the licensee is also required to meet the 40CFR190 standards. 10CFR20.1302 provides options to determine compliance to 10CFR20.1301. Compliance to the above operability requirement is based on 10CFR20 and 40CFR190.

12.5 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM12.5.1 Monitoring ProgramOperability Requirements

12.5.1.A The Radiological Environmental Monitoring Program shall be conducted as specified in Table 12.5-1.

Applicability: At all times.

Action:

1. With the Radiological Environmental Monitoring Program not being conducted as specified in Table 12.5-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Section 12.6.1, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.

Deviations are permitted from the required sampling schedule if specimens are unobtainable due to hazardous conditions, seasonal unavailability, malfunction of sampling equipment, if a person/business who participates in this program goes out of business or no longer can provide sample, or contractor omission which is corrected as soon as discovered. If the equipment malfunctions, corrective actions shall be completed as soon as practical. If a person/business supplying samples goes out of business, a replacement supplier shall be found as soon as possible. All deviations from the sampling schedule will be described in the Annual Radiological Environmental Operating Report.

2. With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 12.5-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, pursuant to 10CFR50 Appendix I, Section IV.A, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose* to a MEMBER OF THE PUBLIC is less than the calendar year limits of Section 12.3.2, 12.4.2, or 12.4.3. When more than one of the radionuclides in Table 12.5.2 are detected in the sampling medium, this report shall be submitted if:

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

When radionuclides other than those in Table 12.5-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose* to A MEMBER OF THE PUBLIC from all radionuclides is equal to or greater than the calendar year limits of Section 12.3.2, 12.4.2, or 12.4.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report required by Section 12.6.1.

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

12.5 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (Continued)

3. If the sample type or sampling location(s) as required by Table 12.5-1 become(s) permanently unavailable, identify suitable alternative sampling media for the pathway of interest and/or specific sampling locations for obtaining replacement samples and add them to the Radiological Environmental Monitoring Program as soon as practicable. The specific locations from which samples were unavailable may then be deleted from the monitoring program.

Prepare and submit a controlled version of the ODCM within 180 days including a revised figure(s) and table reflecting the new location(s) with supporting information identifying the cause of the unavailability of samples and justifying the selection of new location(s) for obtaining samples.

Surveillance Requirements

- 12.5.1.B The radiological environmental monitoring program samples shall be collected pursuant to Table 12.5-1 from the specific locations given in the table and figure(s) in the ODCM, and shall be analyzed pursuant to the requirements of Table 12.5-1 and the detection capabilities required by Table 12.5-3.

Bases

- 12.5.1.C The Radiological Environmental Monitoring Program required by this section provides representative measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides that lead to the highest potential radiation exposures of MEMBERS OF THE PUBLIC resulting from the station operation. This monitoring program implements Section IV.B.2 of Appendix I to 10CFR50 and thereby supplements the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected on the basis of the effluent measurements and the modeling of the environmental exposure pathways. Guidance for this monitoring program is provided by the Radiological Assessment Branch Technical Position on Environmental Monitoring. The initially specified monitoring program will be effective for at least the first 3 years of commercial operation. Following this period, program changes may be initiated based on operational experience.

The required detection capabilities for environmental sample analyses are tabulated in terms of the lower limits of detection (LLDs). The LLDs required by Table 12.5-3 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as a before the fact limit representing the capability of a measurement system and not as an after the fact limit for a particular measurement.

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

12.5 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (Continued)Interpretations

- 12.5.1.D Table 12.5-1 requires "one sample of each community drinking water supply downstream of the plant within 10 kilometers." Drinking water supply is defined as water taken from rivers, lakes, or reservoirs (not well water) which is used for drinking.

TABLE 12.5-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

| EXPOSURE PATHWAY AND/ OR SAMPLE | NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾ | SAMPLING AND COLLECTION FREQUENCY | TYPE AND FREQUENCY OF ANALYSIS |
|---|---|---|--|
| <p>1. Airborne Radioiodine and Particulates</p> | <p>Samples from a total of eight locations:</p> <p>a. Indicator- Near Field</p> <p>Four samples from locations within 4 km (2.5 mi) in different sectors.</p> <p>b. Indicator- Far Field</p> <p>Three additional locations within 4 to 10 km (2.5 to 6.2 mi) in different sectors.</p> <p>c. Control</p> <p>One sample from a control location within 10 to 30 km (6.2 to 18.6 mi).</p> | <p>Continuous sampler operation with particulate sample collection weekly (or more frequently if required due to dust loading), and radioiodine canister collection biweekly.</p> | <p><u>Radioiodine Canister:</u> I-131 analysis biweekly on near field samples and control.⁽²⁾</p> <p><u>Particulate Sampler:</u> Gross beta analysis following weekly filter change⁽³⁾ and gamma isotopic analysis⁽⁴⁾ quarterly on composite filters by location on near field samples and control.⁽²⁾</p> |

TABLE 12.5-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

| EXPOSURE PATHWAY AND/ OR SAMPLE | NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾ | SAMPLING AND COLLECTION FREQUENCY | TYPE AND FREQUENCY OF ANALYSIS |
|--|---|-----------------------------------|--|
| <p>2. Direct Radiation⁽⁵⁾</p> | <p>Forty routine monitoring stations either with a thermoluminescent dosimeter (TLD) or with one instrument for measuring dose rate continuously, placed as follows:</p> <p>a. Indicator- Inner Ring (100 Series TLD) One in each meteorological sector, in the general area of the SITE BOUNDARY (0.1 to 3.8 miles);</p> <p>b. Indicator- Outer Ring (200 Series TLD) One in each meteorological sector, within 6.1 to 10 km (3.8 to 6.2 mi); and</p> <p>c. Other</p> <p>One at each Airborne location given in part 1.a. and 1.b.</p> <p>The balance of the TLDs to be placed at special interest locations beyond the Restricted Area where either a MEMBER OF THE PUBLIC or Commonwealth Edison employees have routine access. (300 Series TLD)</p> | <p>Quarterly</p> | <p>Gamma dose on each TLD quarterly.</p> |

TABLE 12.5-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

| EXPOSURE PATHWAY AND/ OR SAMPLE | NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾ | SAMPLING AND COLLECTION FREQUENCY | TYPE AND FREQUENCY OF ANALYSIS |
|---|--|---|---|
| 2. Direct Radiation ⁽⁵⁾ (Cont'd) | d. Control One at each Airborne control location given in part 1.c | Quarterly | Gamma dose on each TLD quarterly. |
| 3. Waterborne a. Ground/ Well b. Drinking ⁽⁷⁾ c. Surface Water ⁽⁷⁾ d. Control Sample ⁽⁷⁾ | a. Indicator Samples from two sources only if likely to be affected. ⁽⁶⁾ a. Indicator One Sample from each community drinking water supply that could be affected by the station discharge within 10 km (6.2 mi) downstream of discharge. If no community water supply (Drinking Water) exists within 10 km downstream of discharge then surface water sampling shall be performed. a. Indicator One sample downstream a. Control One surface sample upstream of discharge. | Quarterly Weekly grab samples. Weekly grab samples. Weekly grab samples. | Gamma isotopic ⁽⁴⁾ and tritium analysis quarterly. Gross beta and gamma isotopic analyses ⁽⁴⁾ on monthly composite; tritium analysis on quarterly composite. Gross beta and gamma isotopic analyses ⁽⁴⁾ on monthly composite; tritium analysis on quarterly composite. Gross beta and gamma isotopic analyses ⁽⁴⁾ on monthly composite; tritium analysis on quarterly composite. |

TABLE 12.5-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

| EXPOSURE PATHWAY AND/ OR SAMPLE | NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾ | SAMPLING AND COLLECTION FREQUENCY | TYPE AND FREQUENCY OF ANALYSIS |
|--|--|---|--|
| e. Sediment | <p>a. Indicator</p> <p>At least one sample from downstream⁽⁷⁾ area within 10 km (6.2 mi).</p> | Semiannually. | Gamma isotopic analysis ⁽⁴⁾ semiannually. |
| 4. Ingestion a. Milk ⁽⁸⁾ | <p>a. Indicator</p> <p>Samples from milking animals from a maximum of three locations within 10 km (6.2 mi) distance.</p> <p>b. Control</p> <p>One sample from milking animals at a control location within 10 to 30 km (6.2 to 18.6 mi).</p> | Biweekly ⁽⁹⁾ when animals are on pasture (May through October), monthly at other times (November through April). | Gamma isotopic ⁽⁴⁾ and I-131 ⁽¹⁰⁾ analysis on each sample. |
| b. Fish | <p>a. Indicator</p> <p>Representative samples of commercially and recreationally important species in discharge area.</p> <p>b. Control</p> <p>Representative samples of commercially and recreationally important species in control locations upstream of discharge.</p> | Two times annually. | Gamma isotopic analysis ⁽⁴⁾ on edible portions |

TABLE 12.5-1 (Continued)

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

| EXPOSURE PATHWAY AND/ OR SAMPLE | NUMBER OF REPRESENTATIVE SAMPLES AND SAMPLE LOCATIONS ⁽¹⁾ | SAMPLING AND COLLECTION FREQUENCY | TYPE AND FREQUENCY OF ANALYSIS |
|---------------------------------|--|-----------------------------------|--|
| <p>c. Food Products</p> | <p>a. Indicator</p> <p>Two representative samples from the principal food pathways grown in each of four major quadrants within 10 km (6.2 mi):</p> <p>At least one root vegetable sample⁽¹¹⁾</p> <p>At least one broad leaf vegetable (or vegetation)⁽¹¹⁾</p> <p>b. Control</p> <p>Two representative samples similar to indicator samples grown within 15 to 30 km (9.3 to 18.6 mi).</p> | <p>Annually</p> | <p>Gamma Isotopic⁽⁴⁾ analysis on each sample.</p> |

TABLE 12.5-1 (Continued)
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM
TABLE NOTATIONS

- (1) Specific parameters of distance and direction from the centerline of the midpoint of the two units and additional description where pertinent, shall be provided for each and every sample location in Table 12.5-1 of the ODCM Station Annexes. Refer to NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978, and to Radiological Assessment Branch Technical Position, Revision 1, November 1979.
- (2) Far field samples are analyzed when the respective near field sample results are inconsistent with previous measurements and radioactivity is confirmed as having its origin in airborne effluents from the station, or at the discretion of the Radiation Protection Director.
- (3) Airborne particulate sample filters shall be analyzed for gross beta radioactivity 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air particulate samples is greater than 10 times the yearly mean of control samples, gamma isotopic analysis shall be performed on the individual samples.
- (4) Gamma isotopic analysis means the identification and quantification of gamma emitting radionuclides that may be attributable to the effluents from the station.
- (5) One or more instruments, such as a pressurized ion chamber, for measuring and recording dose rate continuously may be used in place of, or in addition to, integrating dosimeters. Film badges shall not be used as dosimeters for measuring direct radiation. The 40 locations is not an absolute number. The number of direct radiation monitoring stations may be reduced according to geographical limitations; e.g., If a station is adjacent to a lake, some sectors may be over water thereby reducing the number of dosimeters which could be placed at the indicated distances. The frequency of analysis or readout for TLD systems will depend upon the characteristics of the specific system used and should be selected to obtain optimum dose information with minimal fading.
- (6) Groundwater samples shall be taken when this source is tapped for drinking or irrigation purposes in areas where the hydraulic gradient or recharge properties are suitable for contamination.
- (7) The "downstream" sample shall be taken in an area beyond but near the mixing zone. The "upstream sample" shall be taken at a distance beyond significant influence of the discharge. Upstream samples in an estuary must be taken far enough upstream to be beyond the station influence.
- (8) If milking animals are not found in the designated indicator locations, or if the owners decline to participate in the REMP, all milk sampling may be discontinued.
- (9) Biweekly refers to every two weeks.
- (10) I-131 analysis means the analytical separation and counting procedure are specific for this radionuclide.
- (11) One sample shall consist of a volume/weight of sample large enough to fill contractor specified container.

TABLE 12.5-2

REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES
REPORTING LEVELS

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

(1) For drinking water samples. This is 40 CFR Part 141 value. If no drinking water pathway exists, a value of 30,000 pCi/l may be used.
 (2) If no drinking water pathway exists, a value of 20 pCi/l may be used.

TABLE 12.5-3

DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS⁽¹⁾LOWER LIMIT OF DETECTION (LLD)⁽²⁾⁽³⁾

| ANALYSIS | WATER (pCi/l) | AIRBORNE PARTICULATE OR GASES (pCi/m ³) | FISH (pCi/kg, wet) | MILK (pCi/l) | FOOD PRODUCTS (pCi/kg, wet) | SEDIMENT (pCi/kg, dry) |
|----------------------|---------------------|--|-----------------------|----------------------|--------------------------------|---------------------------|
| Gross Beta | 4 | 0.01 | 1000 | | | |
| H-3 | 2000 ⁽⁷⁾ | | | | | |
| Mn-54 | 15 | | 130 | | | |
| Fe-59 | 30 | | 260 | | | |
| Co-58,60 | 15 | | 130 | | | |
| Zn-65 | 30 | | 260 | | | |
| Zr-Nb-95 | 15 | | | | | |
| I-131 ⁽⁶⁾ | 1/15 ⁽⁴⁾ | 0.07 | 100 | 0.5/5 ⁽⁵⁾ | 60 | |
| Cs-134 | 15 | 0.01 | 100 | 15 | 60 | 150 |
| Cs-137 | 18 | 0.01 | 100 | 18 | 80 | 180 |
| Ba-La-140 | 15 | | | 15 | | |

TABLE 12.5-3 (Continued)
DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS
TABLE NOTATIONS

- (1) The nuclides on this list are not the only nuclides intended to be considered. Other peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Annual Radiological Environmental Operating Report.
- (2) Required detection capabilities for thermoluminescent dosimeters used for environmental measurements shall be in accordance with the recommendations of Regulatory Guide 4.13.
- (3) The Lower Limit of Detection (LLD) is defined, for purposes of these specifications, as the smallest concentration of radioactive material in a sample that will yield a net count, above system background, that will be detected with 95% probability with only 5% probability of falsely concluding that a blank observation represents a "real" signal.

For a particular measurement system, which may include radiochemical separation, the LLD is defined as follows:

$$LLD = \frac{4.66 S_b + 3/t_b}{(E) (V) (2.22) (Y) (\exp (-\lambda\Delta t))}$$

$$LLD \sim \frac{4.66 S_b}{(E) (V) (2.22) (Y) (\exp (-\lambda\Delta t))}$$

Where: $4.66 S_b \gg 3/t_b$

LLD = the "a priori" Minimum Detectable Concentration (picoCuries per unit mass or volume),

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

$$= \frac{\sqrt{Total Counts}}{t_b}$$

E = the counting efficiency(counts per disintegration),

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

2.22 = the number of disintegrations per minute per picoCurie,

Y = the fractional radiochemical yield, when applicable,

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

TABLE 12.5-3 (Continued)
DETECTION CAPABILITIES FOR ENVIRONMENTAL SAMPLE ANALYSIS
TABLE NOTATIONS

t_b = counting time of the background or blank (minutes), and

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

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

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

Analyses shall be performed in such a manner that the stated LLDs will be achieved under routine conditions. Occasionally, background fluctuations, unavoidable small sample sizes, the presence of interfering nuclides, or other uncontrollable circumstances may render these LLDs unachievable. In such cases, the contributing factors shall be identified and described in the Annual Radiological Environmental Operating Report.

- (4) If no drinking water pathway exists, the value of 15 pCi/l may be used.
- (5) A value of 0.5 pCi/l shall be used when the animals are on pasture (May through October) and a value of 5 pCi/l shall be used at all other times (November through April).
- (6) This LLD applies only when the analytical separation and counting procedure are specific for this radionuclide
- (7) This LLD is the minimum allowable, however, vendors performing environmental sample analyses off-site will be required to meet an LLD of 200 pCi/l.

12.5.2 Land Use CensusOperability Requirements

- 12.5.2.A. A Land Use Census shall be conducted and shall identify within a distance of 10 km (6.2 miles) the location in each of the 16 meteorological sectors* of the nearest milk animal, the nearest residence**, and an enumeration of livestock. For dose calculation, a garden will be assumed at the nearest residence.

Applicability: At all times.

Action:

1. With a Land Use Census identifying a location(s) that yields a calculated dose or dose commitment, via the same exposure pathway 20% greater than at a location from which samples are currently being obtained in accordance with Section 12.5.1, add the new location(s) within 30 days to the Radiological Environmental Monitoring Program given in Chapter 11. The sampling location(s), excluding the control location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after October 31 of the year in which this Land Use Census was conducted. Submit in the next Annual Radiological Environmental Operating Report documentation for a change in the ODCM including a revised figure(s) and table(s) for the ODCM reflecting the new location(s) with information supporting the change in sampling locations.

*This requirement may be reduced according to geographical limitations; e.g. at a lake site where some sector's will be over water.

**The nearest industrial facility shall also be documented if closer than the nearest residence.

Surveillance Requirements

- 12.5.2.B The Land Use Census shall be conducted during the growing season, between June 1 and October 1, at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, aerial survey, or by consulting local agriculture authorities. The results of the Land Use Census shall be included in the Annual Radiological Environmental Operating Report.

Bases

- 12.5.2.C This specification is provided to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the Radiological Environmental Monitoring Program given in the ODCM are made if required by the results of this census.

This census satisfies the requirements of Section IV.B.3 of Appendix I to 10CFR50. An annual garden census will not be required since the licensee will assume that there is a garden at the nearest residence in each sector for dose calculations.

12.5.3 Interlaboratory Comparison Program**Operability Requirements**

12.5.3.A Analyses shall be performed on radioactive materials supplied as part of an Interlaboratory Comparison Program that correspond to samples required by Table 12.5-1.

Applicability: At all times.

Action:

1. With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report.

Surveillance Requirements

12.5.3.B A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report.

Bases

12.5.3.C The requirement for participation in an Interlaboratory Comparison Program is provided to ensure that independent checks on the precision and accuracy of the measurements of radioactive material in environmental samples matrices are performed as part of the quality assurance program for environmental monitoring in order to demonstrate that the results are valid for the purposes of Section IV.B.2 of Appendix I to 10CFR50.

12.6 REPORTING REQUIREMENTS12.6.1 Annual Radiological Environmental Operating Report*

Routine Annual Radiological Environmental Operating Report covering the operation of the Unit(s) during the previous calendar year shall be submitted prior to May 1 (I.T.S. May 15) of each year.

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

The Annual Radiological Environmental Operating Report shall include the results of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the tables and figures in Chapter 11 of the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the Radiological Environmental Monitoring Program; legible maps covering all sampling locations keyed to a table giving distances and directions from the midpoint between the two units; reasons for not conducting the Radiological Environmental Monitoring Program as required by Section 12.5.1, a Table of Missed Samples and a Table of Sample Anomalies for all deviations from the sampling schedule of Table 11.1-1; discussion of environmental sample measurements that exceed the reporting levels of Table 12.5-2 but are not the result of plant effluents, discussion of all analyses in which the LLD required by Table 12.5-3 was not achievable; result of the Land Use Census required by Section 12.5.2; and the results of the licensee participation in an Interlaboratory Comparison Program and the corrective actions being taken if the specified program is not being performed as required by Section 12.5.3.

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

12.6 REPORTING REQUIREMENTS (Cont'd)12.6.1 Annual Radiological Environmental Operating Report (Cont'd)

The Annual Radiological Environmental Operating Report shall also include an annual summary of hourly meteorological data collected over the applicable year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. In lieu of submission with the Annual Radiological Environmental Operating Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.

The Annual Radiological Environmental Operating Report shall also include an assessment of the radiation doses due to the radioactive liquid and gaseous effluents released from the Unit or Station during the previous calendar year. This report shall also include an assessment of the radiation doses to the most likely exposed MEMBER OF THE PUBLIC from reactor releases and other near-by uranium fuel cycle sources including doses from primary effluent pathways and direct radiation, for the previous calendar year. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM, and in compliance with 10CFR20 and 40CFR190, "Environmental Radiation Protection Standards for Nuclear Power Operation."

12.6 REPORTING REQUIREMENTS (Continued)12.6.2 Annual Radioactive Effluent Release Report**

Routine Annual Radioactive Effluent Release Reports covering the operation of the unit during the previous calendar year operation shall be submitted prior to May 1 of the following year.

The Annual Radioactive Effluent Release Reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit as outlined in Regulatory Guide 1.21, "Measuring Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

For solid wastes, the format for Table 3 in Appendix B shall be supplemented with three additional categories: class of solid wastes (as defined by 10CFR61), type of container (e.g., LSA, Type A, Type B, Large Quantity), and SOLIDIFICATION agent or absorbent (e.g., cement, urea formaldehyde).

The Annual Radioactive Effluent Release Reports shall include a list and description of unplanned releases from the site to areas beyond the site boundary of radioactive materials in gaseous and liquid effluents made during the reporting period.

The Annual Radioactive Effluent Release Reports shall include any changes made during the reporting period to the PCP, as well as any major changes to Liquid, Gaseous or Solid Radwaste Treatment Systems, pursuant to Section 12.6.3.

The Annual Radioactive Effluent Release Reports shall also include the following: an explanation as to why the inoperability of liquid or gaseous effluent monitoring instrumentation was not corrected within the time specified in Section 12.2.1 or 12.2.2, respectively; and description of the events leading to liquid holdup tanks or gas storage tanks exceeding the limits of Technical Specification 3.11.1.4 or 3.11.2.6 (I.T.S. 5.5.12), respectively.

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

12.6 REPORTING REQUIREMENTS (Continued)12.6.3 Offsite Dose Calculation Manual (ODCM)

12.6.3.1 The ODCM shall be approved by the Commission prior to initial implementation.

12.6.3.2 Licensee-initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2 (UFSAR Chapter 17). This documentation shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s); and
 2. A determination that the change will maintain the level of radioactive effluent control required by 10CFR20, 40CFR190, 10CFR50.36a, and Appendix I to 10CFR50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the Onsite Review and Investigative Function and the approval of the Plant Manager on the date specified by the Onsite Review and Investigative Function.
- c. Shall be submitted to the Commission in the form of a complete legible copy of the entire ODCM or updated pages if the Commission retains a controlled copy. If an entire copy of the ODCM is submitted, it shall be submitted as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made effective. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

12.6 REPORTING REQUIREMENTS (Continued)12.6.4 Major Changes to Liquid and Gaseous Radwaste Treatment Systems*

Licensee-initiated major changes to the Radwaste Treatment Systems (liquid and gaseous):

- a. Shall be reported to the Commission in the Annual Radioactive Effluent Release Report for the period in which the evaluation was reviewed by the Onsite Review and Investigative Function. The discussion of each change shall contain:
 - 1) A summary of the evaluation that led to the determination that the change could be made in accordance with 10CFR50.59;
 - 2) Sufficient detailed information to totally support the reason for the change without benefit of additional and supplemental information;
 - 3) A detailed description of the equipment, components, and processes involved and the interfaces with other plant systems;
 - 4) An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the License application and amendments thereto;
 - 5) An evaluation of the change, which shows the expected maximum exposures to a MEMBER OF THE PUBLIC and to the general population that differ from those previously estimated in the License application and amendments thereto;
 - 6) A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - 7) An estimate of the exposure to plant operating personnel as a result of the change; and
 - 8) Documentation of the fact that the change was reviewed and found acceptable by the Onsite Review and Investigative Function.
- b. Shall become effective upon review and acceptance by the Onsite Review and Investigative Function.

*Licensees may choose to submit the information called for in this section as part of the annual FSAR update.