

ATTACHMENT 2

CONSUMERS ENERGY  
BIG ROCKPOINT

DOCKET NUMBERS 50-155 AND 72-043

TRANSMITTAL OF SURVEY PACKAGES IN SUPPORT OF BIG ROCK POINT PHASED  
LICENSE TERMINATION

CLASS 1 FINAL STATUS SURVEY RELEASE RECORD, 15(2R)C<sub>1</sub>1,  
WOODS ROAD STORAGE AREA

October 9, 2006

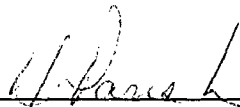
35 Pages

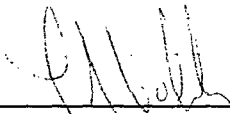
**Class 1 Final Status Survey  
Release Record 15(2R)C<sub>1</sub>1**


**Woods Road Storage Area**

**SURVEY PACKAGE CLOSURE**

Final Status Survey Documentation is authorized for closure. All required reviews are complete and the evaluation of data results have satisfied the criteria established for unrestricted release and onsite use for excavation backfill.

Signed:  Date: 5/15/06  
(ESSG Supervisor)

Signed:  Date: 5/16/06  
(ES Superintendent)

Signed:  Date: 5-23-06  
(RP & ES Manager)

## **Final Status Survey Requirements**

### **Release Record 15(2R)C<sub>1</sub>1 Woods Road Base Storage Area**

#### **Survey Description**

Final Status Survey 15(2R)C<sub>1</sub>1 encompasses an area of 18 m<sup>2</sup> along the south edge of the Woods Road in survey grid 16039. Subsurface structures or components have never existed in this wooded area.

#### **History**

This location was a storage area for minor volumes of miscellaneous refuse and construction debris. Surveys conducted during removal of this material identified elevated levels of residual radioactivity in a small area of debris consisting of brick rubble. This area has been remediated and all materials of plant origin have been removed from the area.

#### **Current Radiological Status**

The results of surveys conducted following debris removal have identified this area to contain radioactivity levels similar to the reference background level for northwestern Michigan. Based on the history of this location, the radiological status of Survey Unit 15(2R) is Class 1. Input for this evaluation includes the following survey data:

- Characterization Survey LTP, Section 2, Appendix 2-E,
- LTP, Section 2.3.3

#### **Post-Construction Expectations**

Survey 15(2R)C<sub>1</sub>1 will be performed in the following activity sequence:

1. Walkdown: ESSG (Environmental Services Survey Group) personnel will perform a walkdown assessment to insure survey area preparations are complete and confirm that the following post-construction expectations have been satisfied as applicable:
  - Groundwater and Surface water control is adequate
  - All construction debris has been removed from the survey area
  - The current survey area status meets all applicable safety requirements
2. Survey Area Isolation and Control: Control measures will be established to ensure that any potential ongoing decommissioning activities in adjacent locations do not impact the current survey area status. Isolation and control measures include postings, barriers, access points, and the evaluation of ongoing work activities in adjacent areas.

3. Survey Design and Execution: Survey design and execution will follow the Data Quality Objectives for Survey 15(2R)C<sub>1</sub>1 in accordance with the survey requirements established in RM-76, *Final Status Survey Design*, and RM-77, *Final Status Survey Implementation*. Survey size will be based on the statistical requirements of the Sign Test for Class 1 areas with soil samples collected in random start, systematic data point locations. Surface scanning will be performed with 100% survey area coverage. This survey will be conducted in accordance with approved BRP procedures and follow the guidance of NUREG 1575.
5. Data Quality Assessment: Isolation and control of the survey area will be maintained until the regulatory requirements for unrestricted site release have been satisfied.

## DATA QUALITY OBJECTIVES

### Release Record 15(2R)C,1 Woods Road Storage Area

#### 1. STATE THE PROBLEM

*The Problem:*

To demonstrate that the level of residual radioactivity in Survey Unit 15(2R) does not exceed the release criteria of 25 mrem/year Total Effective Dose Equivalent (TEDE) in this Class 1 survey area as specified in the License Termination Plan (LTP).

*Stakeholders:*

The primary stakeholders interested in the answer to this problem are Consumers Energy Co., and the general public as represented by the Michigan Department of Environmental Quality (MDEQ), and the US Nuclear Regulatory Commission (USNRC).

*The Planning Team:*

The planning team consists of members of the BRP Environmental Services Survey Group (ESSG). The primary decision maker will be the Final Status Survey (FSS) Supervisor. The Final Status Survey Supervisor will obtain input from the site Construction Group and Scheduling Group for issues relating to schedule and costs.

*Schedule:*

Approximately five (5) working days are projected to implement the Final Status Survey to collect and analyze field data.

*Resources:*

The primary resources needed to determine the answer to the problem are two (2) technicians to perform fieldwork, one (1) technician to prepare the samples and conduct laboratory analyses, and two (2) site characterization team members to prepare and review the design, generate maps, coordinate field activities and evaluate data.

#### 2. IDENTIFY THE DECISION

Several decisions need to be defined to address the stated problem.

*Principal Study Question (1):*

Does the mean concentration of residual radioactivity in the survey unit exceed the release criteria stated above?

*Decision (1):*

Determine whether the mean concentration of residual radioactivity in the survey exceeds the release criteria stated in the problem.

*Actions (1):*

Alternative actions include failure of the survey unit, remediation, or no action required.

*Principal Study Question (2):*

Do any areas of elevated activity in the survey unit exceed the release criteria?

*The Decision (2):*

Determine if any areas of elevated activity in the survey unit exceed the release criteria.

*Actions (2):*

Alternative actions include confirmation and investigation, performing the elevated measurement comparison (EMC), remediation, or no action required.

*Principal Study Question (3):*

Is the potential dose from residual radioactivity in the survey unit ALARA as stated?

*The Decision (3):*

Determine if the potential dose from residual radioactivity in the survey unit is ALARA. ALARA requirements for soil remediation are defined in Chapter 4 of the LTP.

*Actions (3):*

Alternative actions include remediation or no action required.

3. IDENTIFY INPUTS TO THE DECISION

*Information Needed:*

Characterization measurements are required to define the radionuclides present and determine the extent and variability of residual radioactivity in the survey area for design and implementation of this survey. Survey area classification, ALARA analysis, potential radionuclides of interest, and site-specific DCGL values are also required inputs to the decision process. The primary information required for evaluation is the analytical results of survey measurements.

*Source of the Information:*

The soil sample data to be used for survey development are the radionuclide-specific measurements of soil samples collected within the affected local coordinate grids during the characterization process. This data also include the results of surveys performed following the removal of debris. The ALARA analysis for potential soil remediation is provided in LTP, Section 4.4. Site-specific DCGL values and BRP radionuclides of interest are defined in LTP Section 5, Table 5-1 and Procedure RM-76, *Final Status Survey Design*.

Survey 15(2R)C<sub>1</sub> will be conducted in accordance with LTP Section 5 for Class 1 areas and associated BRP survey procedures. Soil samples will be utilized for radionuclide-specific measurements in this evaluation.

4. BOUNDARIES OF THE STUDY

*Boundaries of the Survey:*

The target population for this survey is the upper 15 cm of soil in a defined survey area of 18 m<sup>2</sup>. The physical boundary includes all exposed soils in the excavated area identified by survey design within local coordinate grid 16039.

*Temporal Boundaries:*

Scanning and sampling in this survey unit will only be performed during daylight hours during acceptable weather conditions. Collection of data will take place when surface conditions are most favorable. Surface soils must be free of excessive snow cover and significant standing water prior to surface scanning. Soils must be in a non-frozen state or fragmented for collection to satisfy BRP procedural sampling requirements. The anticipated start date for the survey is April 18, 2006.

*Constraints:*

Cold weather or excessive rain conditions may effect the operation of electronic equipment. Adverse weather conditions that include accumulations of rain or snow may limit area access and delay survey efforts.

## 5. DEVELOP A DECISION RULE

The following decision rules have been developed to define a logical process for choosing among alternative actions for the principal study questions associated with this survey area.

*Decision Rule (1):*

If all reported concentrations for residual radioactivity are less than the site-specific DCGL's and the unity rule has been satisfied for each sample, then the survey unit meets release criteria. No further action is required.

*Decision Rule (2):*

If the mean value of activity in the survey unit is greater than the DCGL, then the survey unit fails to meet the release criteria.<sup>1</sup> Remediate, resurvey, and evaluate the results relative to the decision rule.

*Decision Rule (3):*

If the mean activity in the survey unit is less than the DCGL and any individual sample measurement exceeds this value conduct the Sign Test and the elevated measurement comparison (EMC) per LTP, Chapter 5 and Procedure RM-76, *Final Status Survey Design*. If the EMC and the Sign Test have been satisfied then the survey unit meets the release criteria and no further action is required. If the EMC or the Sign Test has not been satisfied then remediate the area(s) of elevated activity, resurvey as appropriate, and evaluate the results relative to the decision rule.

*Decision Rule (4):*

If the potential dose from residual radioactivity in the survey unit is ALARA, then no further action is necessary. If the potential dose from residual radioactivity in the survey unit is not ALARA, then remediate and resurvey.

---

<sup>1</sup> When multiple radionuclides are present the mean activity value is determined as the average of the weighted sum. The DCGL of the weighted sum is 1.

## 6. SPECIFY TOLERABLE LIMITS ON DECISION ERRORS

### *The Null Hypothesis:*

It is assumed that residual radioactivity in the survey unit exceeds the release criterion.

### *Type I Error ( $\alpha$ ):*

The  $\alpha$  error is the maximum probability of rejecting the null hypotheses when it is true. The  $\alpha$  error is defined in the LTP at a value of at 0.05 (5%) and cannot be changed to a less restrictive value unless prior approval is granted by the USNRC. The  $\alpha$  error value of 0.05 will be used for survey planning and data assessment for this survey area.

### *Type II Error ( $\beta$ ):*

The  $\beta$  error is the probability of accepting the null hypothesis when it is false. A value of 0.05 (5%) will be used for survey planning and data assessment for this survey area.

### *The Lower Bound of the Gray Region (LBGR):*

The LBGR is initially set at 0.5 for this survey unit. The LBGR may be adjusted during survey design to achieve an optimum relative shift between 1.0 and 3.0.

### *Relative Shift ( $\Delta/\sigma$ ):*

The relative shift will be maintained within the range of 1.0 and 3.0 by adjusting the LBGR as appropriate.

## 7. OPTIMIZE DESIGN FOR OBTAINING DATA

### Statistical Test

#### *Sign Test:*

Radionuclides of potential plant origin also present in soil as background activity resulting from fallout constitute only a small fraction of the DCGL. Therefore, the Sign Test will be used where applicable in the FSS evaluation to determine if the survey area meets the requirements for unrestricted release.

#### *Number of Samples Determined:*

The number of samples required for this survey will be determined based on the relative shift as defined by the requirements of the Sign Test (LTP, Chapter 5) and Procedure RM-76, *Final Status Survey Design*. The LBGR is initially set at 0.5 and may be adjusted as necessary for optimizing the survey design to achieve a relative shift between 1.0 and 3.0. Sample point locations are to be determined using a random start, systematic grid spacing. For sample point locations where access is impractical or unsafe, alternate locations will be randomly selected to achieve the sample size requirement.

#### *Biased Sampling:*

Co-60 is the most limiting radionuclide for identification by surface scanning; biased surface and subsurface core samples will be collected in any location that exceeds the scan investigation level for this radionuclide.



*Scan Coverage:*

Scanning for this survey area will provide 100% coverage.

*Number of Samples for Quality Control:*

A minimum of 5% of the sample population will be collected for quality evaluation. These samples may include sample splits, sample recounts, or third party sample analysis. Quality analyses will be conducted as defined in LTP, Chapter 5 and Procedure RM-79, *Final Status Survey Quality Control*.

*Additional Sample Analysis Requirements:*

Additional sampling for the evaluation of tritium in soil is not required in this survey area.

*Investigation Levels:*

Investigation levels are defined in LTP, Chapter 5 and Procedure RM-76, *Final Status Survey Design*, by individual survey area classification. A conservative approach for investigation will be established for this survey as shown below.

**Investigation Levels for Survey 15(R2)C<sub>1</sub>1**

<b>Classification</b>	<b>Scan Measurement</b>	<b>Soil Sample Analysis</b>
Class 1	> DCGL	> DCGL <sub>w</sub>

The investigation levels for soil sample measurements are meant to include any individual radionuclide result greater than the site-specific DCGL or where the combined radionuclide values exceed the unity rule. Co-60 is the most limiting radionuclide for identification by surface scanning; further investigation will be initiated at any location that exceeds the Co-60 Scan <sub>DCGL</sub> of 1818 CPM above background as detailed in the survey design.

## FINAL STATUS SURVEY DESIGN

### Release Record East 15(2R)C<sub>1</sub>1 Woods Road Storage Area

#### Survey Unit Description

Survey 15(2R) encompasses an area of 18 m<sup>2</sup> along the south edge of the Woods Road in survey grid 16039.

#### Soil Sample Design

##### Scoping Data

Characterization scoping measurements for development of the final status survey design resulted in the following input data:

Table 1  
Input Data for Survey Design (pCi/g)

Radionuclides	Cs-137	Co-60
$\sigma$	1.46	0.02
DCGL	11.93	3.21

##### Sample Requirements

The number of sample data points for this survey is based on the requirements of the Sign Test. The Unity Rule is used for the presence of multiple radionuclides. The Standard Deviation of the weighted sum is described by the following:

$$\sigma = \sqrt{\left(\frac{\sigma_{\text{CS137}}}{\text{DCGL}_{\text{CS137}}}\right)^2 + \left(\frac{\sigma_{\text{CO60}}}{\text{DCGL}_{\text{CO60}}}\right)^2}$$

$$\sigma = \sqrt{\left(\frac{1.46}{11.93}\right)^2 + \left(\frac{0.02}{3.21}\right)^2}$$

$$\sigma = 0.12$$

##### Relative Shift

The DCGL for the weighted sum is 1.0. The relative shift is determined using an LBGR value set at 76% of the DCGL<sub>w</sub>.

$$\text{Relative Shift} = \frac{\text{DCGL} - \text{LBGR}}{\sigma}$$

$$\text{Relative Shift} = \frac{1 - 0.76}{0.12}$$

$$\text{Relative Shift} = 2.0$$

With  $\alpha$  and  $\beta$  error levels set at 0.05 and the relative shift of 2.0, the Sign Test requires 15 sample data points (Table 5.5 NUREG 1575).

### Sample Locations

Sample locations are selected in a random-start systematic pattern with the southwest corner of the survey unit as origin (X=0, Y=0). Two numbers between 0 and 1 have been randomly selected and then applied to the survey unit maximum X and Y dimensions to determine the random start location as shown below.

Table 2  
Random Numbers

Random #, X Axis	Random #, Y Axis
0.806645	0.252172

Survey Dimensions: X (E/W) = 3.0 meters  
Y (N/S) = 6.0 meters

Random Start Location X = (0.806645)(3.0) = 2.4 meters  
With SW Corner Origin: Y = (0.252172)(6.0) = 1.5 meters

The survey unit origin is located in Grid 16039 of the site coordinate system at X=7 meters, Y= 0.0 meters. The random start location for this survey is located in Grid 16039 at X= 2.4 meters Y= 1.5 meters.

### Sample Spacing

Samples are located in a systematic square grid pattern with sample spacing determined by the following:

$$L = \sqrt{\frac{18}{15}}, \quad \text{where } A = \text{area of survey unit and} \\ n = \text{number of samples.}$$

$$L = \sqrt{\frac{18}{15}} = 1.1 \text{ meters}$$

With sample spacing established at 1.1 meters, 18 data point locations are available for survey as identified in Attachment 1.

## QA/QC Sampling

A minimum of 5% of the sample population and 5% of the scan survey area are required to be selected for QA/QC verification in accordance with BRP Procedure RM-79, *Final Status Survey Quality Control*. As a conservative measure, three (3) soil samples and 10% of the scan survey area will be selected for QA/QC evaluation. Data point locations for soil sampling will be determined by random number selection.

The starting point and track direction for QA/QC scanning are also determined by random number selection. The first random data point selected will identify the scanning start point and the second random data point will determine the direction in which the scan will track. QA/QC location results are provided in Table 3.

Table 3  
Random Numbers Generated for QA/QC

QA/QC Soil Samples	Random Sample Number	Verification Scan	Random Sample Number
Split Sample:	15	Start Point:	16
Sample Recount:	3	Scan Towards :	6
Sample Recount:	4	Minimum Scan Area Requirement:	1.8 m <sup>2</sup>

## Surface Scanning

The coverage requirement for surface scanning in this Class 1 area is 100%. The Scan<sub>MDC</sub> has been established at fractional values of the DCGL<sub>w</sub> for typical background activity levels at Big Rock Point. Scan<sub>MDC</sub> values for varying backgrounds are provided in Attachment 2.

The investigation level for identification of potential areas of elevated activity in this survey area will be the Scan<sub>DCGL</sub> as defined by the following:

$$\text{SCAN}_{\text{DCGL}} = \text{Detector Rating} \frac{\text{CPM}}{\text{uR/hr}} * \text{Exposure Model} \frac{\text{uRi/hr}}{\text{pCi/g}} * \text{DCGL}_w$$

$$\text{Scan}_{\text{DCGL}} \text{ for Co-60} = 1818 \text{ cpm}$$

$$\text{Scan}_{\text{DCGL}} \text{ for Cs-137} = 3518 \text{ cpm}$$

Where:<sup>1</sup>

$$\text{Detector Rating} = \frac{1200 \text{ CPM}}{\text{uR/hr}} \text{Cs-137 and } \frac{565 \text{ CPM}}{\text{uR/hr}} \text{Co-60}$$

$$\text{Exposure Model} = \frac{1.229 \text{ uRi/hr}}{5 \text{ pCi/g}} \text{Cs-137 and } \frac{5.029 \text{ uRi/hr}}{5 \text{ pCi/g}} \text{Co-60}$$

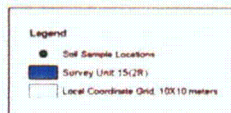
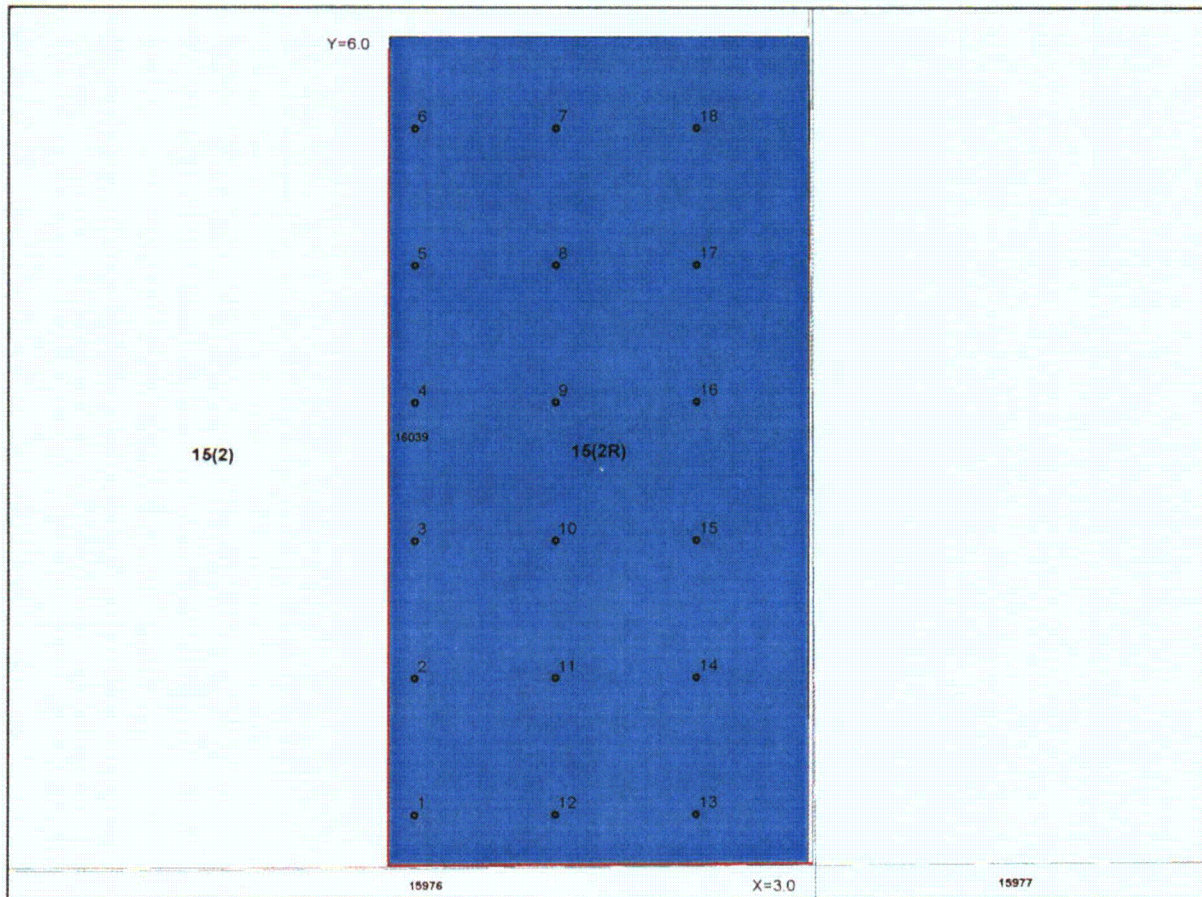
$$\text{DCGL}_w = 11.93 \text{ pCi/g Cs-137 and } 3.21 \text{ pCi/g Co-60}$$

<sup>1</sup> These values established in EA-BRP-SC-0201, *Nal Scanning Sensitivity For Open Land Survey*

The DCGL<sub>w</sub> for Co-60 is the most limiting value for scanning measurements performed to identify areas of potentially elevated activity. Scanning conducted for this Final Status Survey will assume all residual radioactivity to originate from Co-60 and the instrument response at the Co-60 DCGL<sub>w</sub> (1818 cpm) will be used as the scanning investigation level for Survey 15(2R)C<sub>1</sub>1.

# Attachment 1 Soil Sample Locations

## Release Record 15(2R)C<sub>1</sub>1 Woods Road Storage Area



Sample No.	X Coord.	Y Coord.	Sample No.	X Coord.	Y Coord.
1	0.2	0.4	10	1.3	2.6
2	0.2	1.5	11	1.3	1.5
3	0.2	2.6	12	1.3	0.4
4	0.2	3.7	13	2.4	0.4
5	0.2	4.8	14	2.4	1.5
6	0.2	5.9	15	2.4	2.6
7	1.3	5.9	16	2.4	3.7
8	1.3	4.8	17	2.4	4.8
9	1.3	3.7	18	2.4	5.9

\*Sample No. 14 is the Random Start Location



**Attachment 2**  
**Scan MDC In Varying Backgrounds**

**Release Record East 15(2R)C<sub>1</sub>1**  
**Woods Road Storage Area**

				CPM	MDER uR/hr		Scan MDC pCi/g	
Background	d'	<i>l</i>	<i>s<sub>i</sub></i>	MDCR <sub>surveyor</sub>	Cs-137	Co-60	Cs-137	Co-60
2000	2.48	4	28.64	607.47	0.51	1.08	2.06	1.07
2500	2.48	4	32.02	679.18	0.57	1.20	2.30	1.20
3000	2.48	4	35.07	744.00	0.62	1.32	2.52	1.31
3500	2.48	4	37.88	803.61	0.67	1.42	2.72	1.41
4000	2.48	4	40.50	859.10	0.72	1.52	2.91	1.51
4500	2.48	4	42.95	911.21	0.76	1.61	3.09	1.60
5000	2.48	4	45.28	960.50	0.80	1.70	3.26	1.69
5500	2.48	4	47.49	1,007.38	0.84	1.78	3.42	1.77
6000	2.48	4	49.60	1,052.17	0.88	1.86	3.57	1.85
6500	2.48	4	51.63	1,095.14	0.91	1.94	3.71	1.93
7000	2.48	4	53.57	1,136.48	0.95	2.01	3.85	2.00
7500	2.48	4	55.45	1,176.37	0.98	2.08	3.99	2.07
8000	2.48	4	57.27	1,214.95	1.01	2.15	4.12	2.14
8500	2.48	4	59.04	1,252.34	1.04	2.22	4.25	2.20
9000	2.48	4	60.75	1,288.65	1.07	2.28	4.37	2.27
9500	2.48	4	62.41	1,323.96	1.10	2.34	4.49	2.33
10000	2.48	4	64.03	1,358.35	1.13	2.40	4.61	2.39
10500	2.48	4	65.61	1,391.90	1.16	2.46	4.72	2.45
11000	2.48	4	67.16	1,424.65	1.19	2.52	4.83	2.51
11500	2.48	4	68.67	1,456.67	1.21	2.58	4.94	2.56
12000	2.48	4	70.14	1,488.00	1.24	2.63	5.04	2.62
12500	2.48	4	71.59	1,518.68	1.27	2.69	5.15	2.67
13000	2.48	4	73.01	1,548.76	1.29	2.74	5.25	2.73
13500	2.48	4	74.40	1,578.26	1.32	2.79	5.35	2.78
14000	2.48	4	75.77	1,607.22	1.34	2.84	5.45	2.83
14500	2.48	4	77.11	1,635.67	1.36	2.89	5.55	2.88
15000	2.48	4	78.42	1,663.63	1.39	2.94	5.64	2.93
Modeled Exposure (uR/hr) @ 5 pCi/g								
	Cs-137	1.23E+00						
	Co-60	5.03E+00						

**Attachment 3**  
**Area Factors for Open Land Survey Evaluation**

**Release Record 15(2R)C<sub>1</sub>1**  
**Woods Road Storage Area**

Contaminated Area (m <sup>2</sup> )	Calculated Area Factors at Time of Peak Dose								
	H-3	Mn-54	Fe-55	Co-60	Sr-90	Cs-137	Eu-152	Eu-154	Eu-155
8094	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
4047	1.00	1.01	1.00	1.01	1.00	1.02	1.02	1.01	1.02
2024	1.00	1.03	1.00	1.03	1.00	1.03	1.03	1.03	1.03
1012	1.35	1.04	1.00	1.04	1.00	1.04	1.05	1.04	1.04
506	2.91	1.09	1.98	1.08	1.98	1.13	1.07	1.07	1.06
253	6.05	1.14	3.95	1.13	3.94	1.20	1.11	1.11	1.09
126	12.4	1.20	7.93	1.20	7.87	1.29	1.17	1.16	1.14
63	24.9	1.30	15.8	1.30	15.6	1.41	1.27	1.26	1.23
32	49.2	1.49	31.2	1.49	30.5	1.62	1.44	1.45	1.39
16	98.9	1.78	62.0	1.78	59.9	1.93	1.72	1.73	1.63
8	198	2.38	123	2.38	117	2.58	2.30	2.31	2.14
4	397	3.61	243	3.62	230	3.91	3.49	3.52	3.19
2	794	5.68	473	5.75	452	6.14	5.48	5.55	4.90
1	1590	9.57	905	9.73	887	10.3	9.24	9.39	7.88



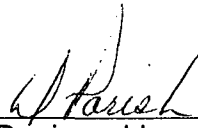
RM-76-5  
FINAL STATUS SURVEY APPROVAL  
AND AUTHORIZATION FOR IMPLEMENTATION

Survey Code 15(2R)C.1

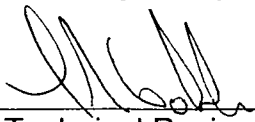
Survey Area Description:

Woods Road Storage Area - Grid # 16039  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The survey area is authorized for Final Status Survey Implementation.

  
Designed by

04/17/06  
Date

  
Technical Review by

04/17/06  
Date

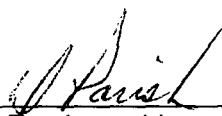
RM-77-1  
SURVEY IMPLEMENTATION CHECKLIST  
Page 1 of 3

<u>Step</u>		<u>Initial</u>	<u>Date</u>
(✓) 1.0	PREPARATION FOR SURVEY <u>15(2R)CL</u> Survey #		
1.1	Survey Area Status:		
<input checked="" type="checkbox"/>	a. Final Status Survey Design has been approved for implementation (see RM-76-5, Final Status Survey Approval and Authorization for Supplementation).		
	1. Survey area walkdown complete		
	2. Survey area determined ready for FSS		
	3. Decommissioning activities that may impact the environmental status of the survey area have been completed.		
	4. Survey area environment is controlled by barriers and postings or other approved method to restrict access.	<u>JAL</u> ESSG	<u>4-17-06</u>
<input checked="" type="checkbox"/>	b. Survey area has been turned over to the Environmental Services Survey Group (ESSG) in acceptable condition for FSS.	<u>JAL</u> ESSG	<u>4-17-06</u>
1.2	Field Preparation:		
<input checked="" type="checkbox"/>	a. Survey unit boundaries delineated (Step 6.1.1)		
<input checked="" type="checkbox"/>	b. Statistical soil samples predetermined in the survey design are located and marked within the survey unit. (Step 6.1.2)		
<input checked="" type="checkbox"/>	c. Soil sample locations verified (Step 6.1.2.c)		
<input checked="" type="checkbox"/>	d. Instruments and equipment have been collected and calibrated for data measurement and collection (Step 6.1.3)		
<input checked="" type="checkbox"/>	e. Field documentation is prepared (Step 6.1.4)	<u>JAL</u> ESSG	<u>4-17-06</u>

RM-77-1  
SURVEY IMPLEMENTATION CHECKLIST  
Page 2 of 3

		<u>Initial</u>	<u>Date</u>
2.0	DATA COLLECTION		
2.1	Soil Survey:		
<u>✓</u>	All soil samples collected and controlled (Step 6.2.1).	<u>ESSG</u>	<u>4-17-06</u>
2.2	Surface Scan:		
<u>✓</u>	Surface Scan complete. Action response requirements have been conducted on any identified areas exceeding the investigation level (Step 6.3).	<u>ESSG</u>	<u>4-17-06</u>
2.3	Judgmental Soil Samples:		
<u>N/A</u>	a. Judgmental soil samples have been collected and controlled (Step 6.2.3).		
<u>N/A</u>	b. Deep core profiles performed in areas identified to contain elevated residual activity (Step 6.2.3).	<u>ESSG</u>	<u>4-24-06</u>
3.0	SAMPLE PREPARATION AND LABORATORY ANALYSIS		
3.1	Sample Preparation (Step 6.4.1):		
<u>✓</u>	a. Soil samples are homogenous		
<u>✓</u>	b. Soil samples are visibly dry prior to packing		
<u>✓</u>	c. Non-soil materials have been removed from sample		
<u>✓</u>	d. Soil samples have been transferred to one-liter Marinelli containers and are labeled and sealed.	<u>ESSG</u>	<u>4-17-06</u>

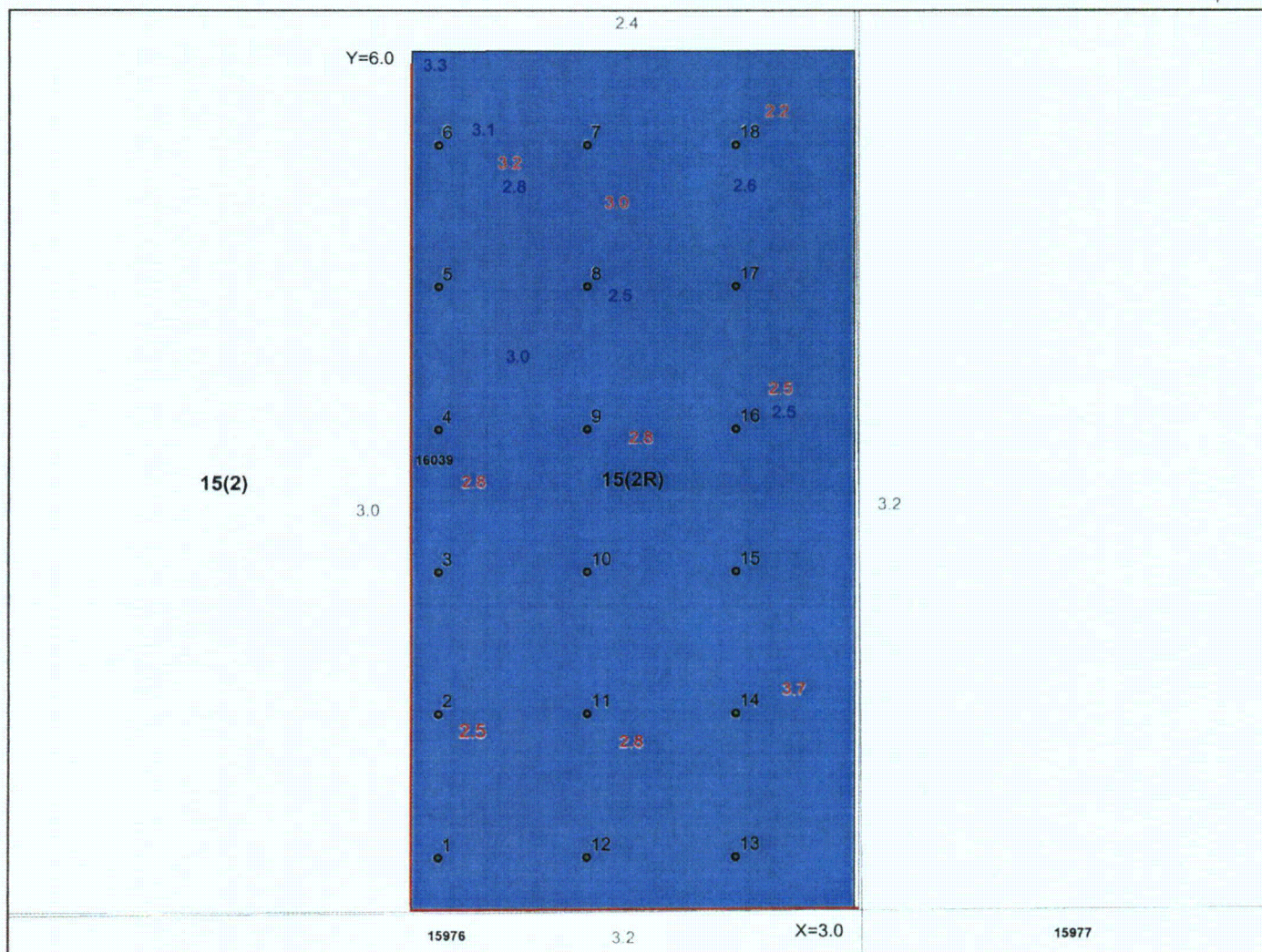
RM-77-1  
SURVEY IMPLEMENTATION CHECKLIST  
Page 3 of 3



- |   |  | <u>Initial</u> | <u>Date</u>    |
|---|--|----------------|----------------|
| 3.2   | Laboratory Analysis:   |                |                |
| <input checked="" type="checkbox"/>   | Isotopic analyses are complete. The spectroscopy report requires a signature of completion by the laboratory analyst and a signature of evaluation documenting that a second level review has been performed (Step 6.4.2). | <u>ESSG</u>    | <u>4-20-06</u> |
| 3.3   | Sample Control and Documentation:  |                |                |
|   | Chain of custody documentation exhibits control of soil samples (Step 6.4.3).  | <u>ESSG</u>    | <u>4-20-06</u> |
| <br><div style="display: flex; justify-content: space-around; align-items: flex-end;"><div style="text-align: center;"><br/>_____<br/>Reviewed by</div><div style="text-align: center;"><u>4/24/06</u><br/>_____<br/>Date</div></div> |  |                |                |

ATTACHMENT RM-59-1  
SAMPLING AND ANALYSIS REPORT

Date: 4-17-06	Time: 1600	Location: 15(2R)C.1	Tech: T. Schlueter
<b>SURVEY IDENTIFICATION / DESCRIPTION</b>			
Woods Road Storage Area in Grid #16039			
<b>SURVEY TYPE</b>			
Survey Type:	Characterization <input checked="" type="checkbox"/>	Scan (Motive)	
	Remediation <input type="checkbox"/>		
	Final <input checked="" type="checkbox"/>	Scan (Static)	
		Trenching and Digging (use RM-59-4)	
<b>SURVEY DESIGN</b>			
Sample Collection:	Judgmental <input type="checkbox"/>	Random <input type="checkbox"/>	Systematic <input checked="" type="checkbox"/> Large Container Assay <input type="checkbox"/>
Scan Coverage:	100 %		
<b>ANALYSIS</b>			
Inst./Serial No. 186201	DAILY CHECK: <input checked="" type="checkbox"/>	SAT <input type="checkbox"/>	UNSAT INIT: <input checked="" type="checkbox"/>
Inst./Serial No. #6	DAILY CHECK: <input checked="" type="checkbox"/>	SAT <input type="checkbox"/>	UNSAT INIT: <input checked="" type="checkbox"/>
Investigation of Unidentified Peaks:	<input checked="" type="checkbox"/>	SAT <input type="checkbox"/>	UNSAT INIT: <input checked="" type="checkbox"/>
Minimum Detectable Activity (Section 5.3.2)	<input checked="" type="checkbox"/>	SAT <input type="checkbox"/>	UNSAT INIT: <input checked="" type="checkbox"/>
<b>COMMENTS</b>			
Survey 15(2R)C.1 was performed in a random start, square grid, systematic sampling pattern with samples collected at 18 locations. Laboratory analyses did not identify residual activity above trace levels of the DCG value. 100% surface scan identified no areas of elevated residual radioactivity. Results of the QA/QC verification scanning (10 % coverage) were consistent with scan values identified in the survey.			
Technician Signature: T. Schlueter		Date: 4-17-06	
Second Level Review: Jodie Reed		Date: 4-24-06	

Release Record 15(2R)C<sub>1</sub>1  
Woods Road Storage Area



● Soil Sample Locations  
 Survey Unit 15(2R)  
 Local Coordinate Grid, 10X10 meters

RED Values are Average Mobile Scan General Area Activity (kcpm)  
 BLUE Values are Average Verification Scan General Area Activity (kcpm)  
 GREY Values are Average General Background Area Activity (kcpm)

Technician Signature: T. Schmitt

Date: 4/17/06  
Time: 1320

QC Verification Scan: 10

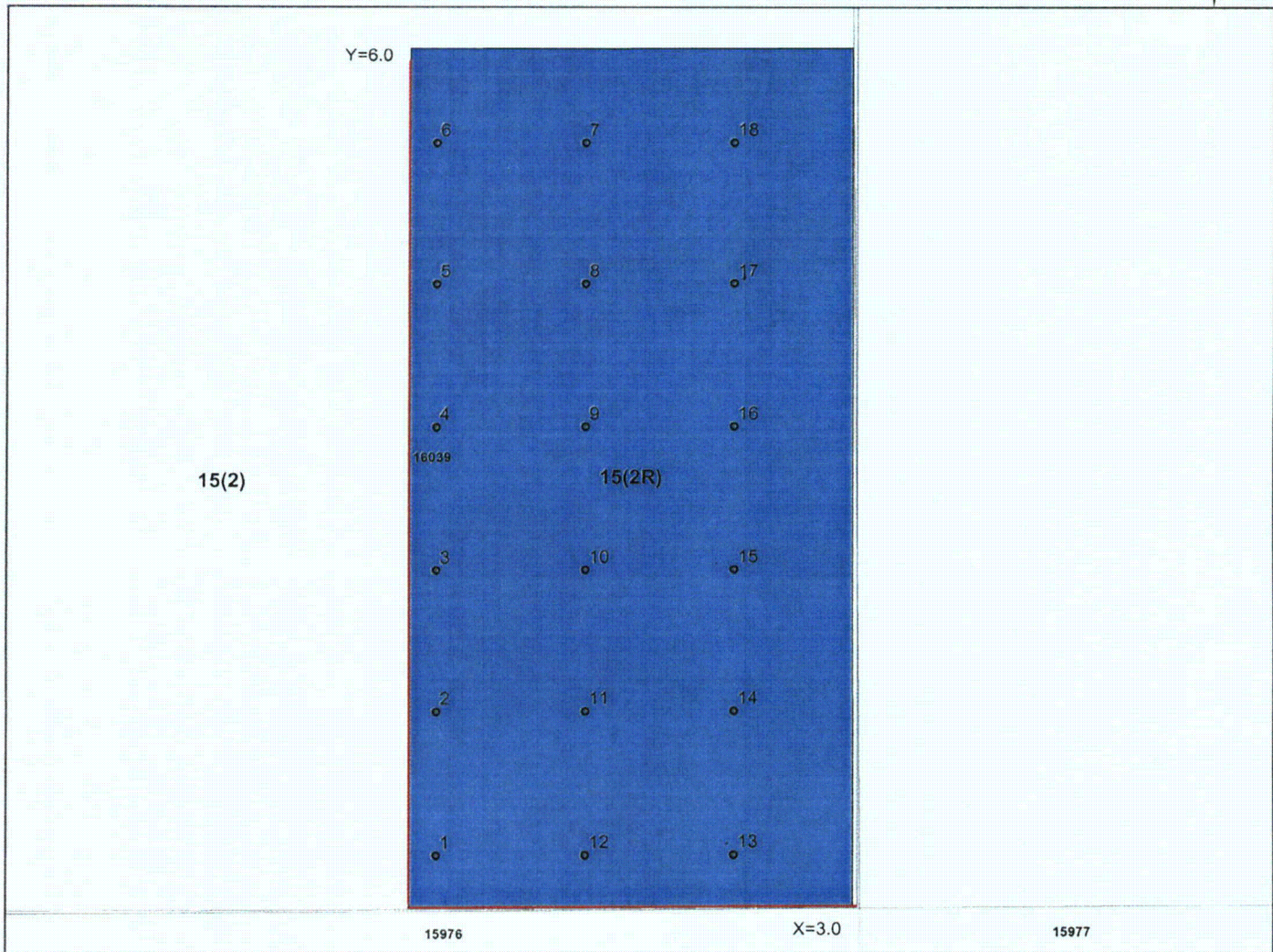
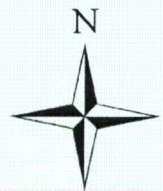
Technician Signature: *H. H. H. H. H.*

Date: 4/17/06  
Time: 1430



# Activity Summary

## Release Record 15(2R)C<sub>1</sub>1 Woods Road Storage Area



Legend	
●	Soil Sample Locations
■	Survey Unit 15(2R)
□	Local Coordinate Grid, 10X10 meters

Sample No.	X Coord.	Y Coord.	Cs-137 (pCi/g)		Co-60 (pCi/g)	
			Activity	MDA	Activity	MDA
1	0.2	0.4	0.1066		*-0.0174	0.0453
2	0.2	1.5	*0.0451	0.0607	*0.0027	0.0521
3	0.2	2.6	0.3611		*0.0153	0.0505
4	0.2	3.7	1.2590		*0.0169	0.0753
5	0.2	4.8	1.8130		*0.0003	0.0387
6	0.2	5.9	1.6470		*0.0143	0.0413
7	1.3	5.9	2.6970		*-0.0111	0.0295
8	1.3	4.8	0.8899		*0.0212	0.0451
9	1.3	3.7	2.0660		*0.0295	0.0608
10	1.3	2.6	0.3061		*0.0141	0.0534
11	1.3	1.5	0.0706		*0.0188	0.0520
12	1.3	0.4	0.1319		*-0.0152	0.0447
13	2.4	0.4	0.0523		*-0.0121	0.0389
14	2.4	1.5	0.5063		*0.0451	0.0746
15	2.4	2.6	0.4355		*-0.0044	0.0515
16	2.4	3.7	0.7429		*0.0184	0.0695
17	2.4	4.8	1.2260		*0.0183	0.0496
18	2.4	5.9	0.2664		*-0.0050	0.0395

\*Forced-count values

\*\*Coordinate location relative to SW corner of survey unit where X=0 m. and Y=0 m.

15 (2R) C, 1  
RM-72-1  
CHAIN-OF-CUSTODY RECORD

Sample Number	Sampling Location	Date	Time	Final Disposition of Sample
1	(0.2)(0.4)	4/17/06	1400	Env. Seavan
2	(0.2)(1.5)	4/17/06	1403	
3	(0.2)(2.6)	4/17/06	1405	
4	(0.2)(3.7)	4/17/06	1407	
5	(0.2)(4.8)	4/17/06	1409	
6	(0.2)(5.9)	4/17/06	1412	
7	(1.3)(5.9)	4/17/06	1415	
8	(1.3)(4.8)	4/17/06	1420	
9	(1.3)(3.7)	4/17/06	1426	
10	(1.3)(2.6)	4/17/06	1428	
11	(1.3)(1.5)	4/17/06	1431	
12	(1.3)(0.4)	4/17/06	1435	
13	(2.4)(0.4)	4/17/06	1441	
14	(2.4)(1.5)	4/17/06	1443	
15	(2.4)(2.6)	4/17/06	1447	
15 QA split	(2.4)(2.6)	4/17/06	1447	
16	(2.4)(3.7)	4/17/06	1450	
17	(2.4)(4.8)	4/17/06	1453	
18	(2.4)(5.9)	4/17/06	1456	Env. Seavan

(Samples may be analyzed and stored, shipped for offsite evaluation or analyzed and disposed of.)

1. Relinquished by: <i>[Signature]</i>	Date 4-17-06	Time 1510	Received in good condition by: Lab. T. Schlueter
2. Relinquished by: T. Schlueter	Date 4-18-06	Time 0705	Received in good condition by: <i>[Signature]</i>
3. Relinquished by: <i>[Signature]</i>	Date 4-20-06	Time 1600	Received in good condition by: Permanent Storage
4. Relinquished by:	Date	Time	Received in good condition by:



RM-78-3  
DATA ASSESSMENT REPORT  
Page 1 of 8

FINAL STATUS SURVEY: 15 (2R) C, 1

1.0 DATA VERIFICATION

1.1 Data Acceptance

☒ Review the Implementation Checklist (RM-77-1) to verify that survey isolation and control measures were executed prior to FSS and are being maintained.

☒ Review RM-77, Final Status Survey Implementation, to verify that methods, techniques, and survey activities required for FSS have been applied in accordance with the appropriate procedures.

1.2 Field QC Records:

☒ Review all assessments, Condition Reports and audits to ensure that identified issues have been resolved.

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

☒ Verify scan instrumentation was in calibration and the QC source checks were performed prior to and after surveys.

☒ Verify daily QC source checks for Canberra gamma spectroscopy detector properly logged prior to soil sample analysis.

1.3 Review Verification:

☒ Verify that the Data Quality Objectives are complete.

☒ Verify that the survey design has been technically reviewed.

RM-78-3  
DATA ASSESSMENT REPORT  
Page 2 of 8

- ☒ Verify that gamma spectroscopy results have received a technical review.
- ☒ Verify the Sample and Analysis Report (RM-59-1) is completed and reviewed.

Data Verification Completed: ☒ Yes ☐ No

Comments \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Joshua L. Reed      4-24-06  
Assessor                      Date

RM-78-3  
DATA ASSESSMENT REPORT  
Page 3 of 8

2.0 DATA VALIDATION

2.1 Documentation Review:

Perform documentation review for quality control purposes and validate the data collected is complete and appropriate for use as defined by the survey design. Documentation includes:

- ☒ Field measurement records
- ☒ Chain-of-custody
- ☒ Quality Control (QC) measurement records
- ☒ Current qualification of survey personnel
- ☒ Corrective Action Reports
- ☒ Data inputs (laboratory spectroscopy)
- ☒ Sample preparation techniques

2.2 Detection Limit Review:

- ☒ Scan MDCs are below established site DCGLs.
- ☒ Forced-count values are assigned as necessary when activity is not detected in a sample.
- ☒ Minimum Detectable Concentration (MDC) values of gamma spectroscopy are below established DCGLs.

2.3 Quality Control (QC) Data Review:

- ☒ Quality Control (QC) data results have received required reviews and are complete and consistent.
- ☒ Results of judgmental samples have been reviewed and evaluated.
- ☒ Review to ensure that the analytical results of judgmental samples do not impact the evaluation for unrestricted release of the survey area.

RM-78-3  
DATA ASSESSMENT REPORT  
Page 4 of 8

2.4 Qualification of Data:

Statistical radionuclide-specific measurements for completeness. Evaluate the survey for determination of data usability and confirm that sufficient qualified data are present for the decision process.

- a. Total number of statistical samples planned for the survey: 15
- b. Total number of statistical samples determined as valid: 18
- c. Calculate % Completeness:  $\frac{b}{a} \times 120 = \underline{144\%}$

☒ Qualified data are  $\geq 100\%$  completeness and are sufficient to support the Sign Test requirement for determination of unrestricted release.

Data Validation Completed: ☒ Yes ☐ No

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Joshua L. Reed  
Assessor

4-24-06  
Date

RM-78-3  
DATA ASSESSMENT REPORT  
Page 5 of 8

3.0 DATA QUALITY ASSESSMENT

3.1 Review the DQOs and Survey Design:

- ☒ Confirm that all inputs to the decision have been reviewed and are complete.
- ☒ Verify that boundaries or constraints identified in the survey area have not affected the quality of the data.
- ☒ Review the Statement of Hypothesis and confirm that it remains relevant.
- ☒ Confirm that Type I and Type II error limits are consistent with DQOs.
- ☒ Confirm that the survey design is consistent with DQOs and that the appropriate number of data points were obtained.

3.2 Preliminary Review:

3.2.1 Preliminary Evaluation:

- ☒ N/A Quality Assessment (QA) reports consistent with procedure RM-79, Final Status Survey Quality Control.
- ☒ Survey is of sufficient intensity to satisfy classification requirement.
- ☒ Potential trends of radioactivity levels in the survey area do not impact a decision for unrestricted release.

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

RM-78-3  
DATA ASSESSMENT REPORT  
Page 6 of 8

3.2.2 Calculate Basic Statistical Quantities:

- a. Number of qualified data points 18
- b. Calculation of the Mean 0.0695
- c. Calculation of the Median 0.0458
- d. Calculation Standard Deviation 0.0709

N/A Attach graphic representation of the data if any radionuclide-specific measurements exceed 50% of the DCGL.

✓ Sample QA/QC measurements consistent with FSS data

3.3 Statistical Evaluation:

NOTE: If all measurement data are less than the  $DCGL_w$ , statistical testing is not required and the survey unit meets the regulatory requirement for unrestricted release.

✓ All survey measurements are below the  $DCGL_w$ .

3.3.1 Verify Assumptions of the Survey Design

N/A Review the posting plot to verify that the data exhibits spatial independence. Spatial trends must be investigated and resolved prior to further assessment.

N/A Review to verify dispersion symmetry. The appearance of skewed data must be investigated for cause and documented prior to further assessment.

RM-78-3  
DATA ASSESSMENT REPORT  
Page 7 of 8

N/A Review the dataset standard deviation and range for data variance. Questionable data must be investigated for cause and documented prior to further assessment.

N/A Verify that the data exhibits adequate power and confirm that the sample size is sufficient to satisfy the DQOs.

3.4 Draw Conclusions from the Data:

3.4.1 Investigation Levels and Response Actions

✓ Determine if data results have exceeded any investigation level. Document findings. *No investigation levels exceeded.*

3.4.2 Evaluation for Unrestricted Release

Select applicable conclusion:

✓ Survey area acceptance criteria met and survey area satisfies the requirements for unrestricted release:

✓ All concentrations are less than the  $DCGL_w$ . The Null Hypothesis is rejected.

N/A The mean concentration of the survey area is below the  $DCGL_w$  but individual measurements in the survey unit exceed the  $DCGL_w$ . The Sign Test and EMC evaluation are successful and the Null Hypothesis is rejected.

RM-78-3  
DATA ASSESSMENT REPORT  
Page 8 of 8

N/A Survey area acceptance criteria not met and survey area fails to satisfy the requirements for unrestricted release:

N/A The mean concentration in the survey area exceeds the  $DCGL_w$  and the null hypothesis is confirmed.

N/A The mean concentration of the survey area is below the  $DCGL_w$  but individual measurements in the Unit exceed the  $DCGL_w$ . The Sign Test and EMC evaluation are unsuccessful and the null hypothesis is confirmed.

Data Quality Assessment Completed: Yes No

Comments Statistical quantities provided in Attachment!

Jodie L. Read  
Assessor

4-24-06  
Date

Reviews:

[Signature]  
Technical Review

4/24/06  
Date

[Signature]  
ES Superintendent

5/15/06  
Date

[Signature]  
RP&ES Manager

5-23-06  
Date



**RM 78-3, Attachment 1  
Statistical Quantities**

**Release Record 15(2R)C,1  
Woods Road Storage Area**

Sample Number	Results*		Statistical Calculations			
	Cs-137 (pCi/g)	Co-60 (pCi/g)	Weighted Sum (SOR)	Wt Sum < DCGLw? **	DCGLw - Wt Sum	Sign
1	0.1066	-0.1066	-0.0243	yes	0.9757	+1
2	0.0451	0.0027	0.0046	yes	0.9954	+1
3	0.3611	0.0153	0.0350	yes	0.9650	+1
4	1.2590	0.0169	0.1108	yes	0.8892	+1
5	1.8130	0.0003	0.1521	yes	0.8479	+1
6	1.6470	0.0143	0.1425	yes	0.8575	+1
7	2.6970	0.0111	0.2295	yes	0.7705	+1
8	0.8899	0.0212	0.0812	yes	0.9188	+1
9	2.0660	0.0295	0.1824	yes	0.8176	+1
10	0.3061	0.0141	0.0301	yes	0.9699	+1
11	0.0706	0.0188	0.0118	yes	0.9882	+1
12	0.1319	-0.0152	0.0063	yes	0.9937	+1
13	0.0523	-0.0121	0.0006	yes	0.9994	+1
14	0.5063	0.0451	0.0565	yes	0.9435	+1
15	0.4355	-0.0044	0.0351	yes	0.9649	+1
16	0.7429	0.0184	0.0680	yes	0.9320	+1
17	1.2260	0.0183	0.1085	yes	0.8915	+1
18	0.2664	-0.0050	0.0208	yes	0.9792	+1

<b>Mean:</b>	0.8124	0.0046	0.0695
<b>Std. Dev.:</b>	0.7998	0.0315	0.0709
<b>Median:</b>	0.4709	0.0142	0.0458
<b>Maximum:</b>	2.6970	0.0451	0.2295

Number of Positive Differences (S+):	n/a
Critical Value, k, Table I.3 of <i>Marssim</i> :	n/a
S+ > than k?:	n/a

**Survey Unit Pass or Fail:      *PASS***

\*Note: Forced-Count values are used for samples with activity levels below the MDA.

\*\*Note: If all measurement data are less than the DCGL<sub>w</sub>, then the Sign Test is not required.