OFFSITE DOSE CALCULATION MANUAL
PALO VERDE NUCLEAR GENERATING STATION
UNITS 1, 2 AND 3

REVISION 21

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1.0 INTRODUCTION

The Offsite Dose Calculation Manual (ODCM) implements the program elements which are required by the Administrative Controls section of the Technical Specifications. The ODCM contains the operational requirements, the surveillance requirements, and actions required if the operational requirements are not met for the Radioactive Effluent Controls Program and the Radiological Environmental Monitoring Program to assure compliance with 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. The Technical Specifications, Section 3.0, also apply to the ODCM. Substitute the word "Requirements" for "Limiting Condition for Operation." It should be noted that the hot and cold shutdown and operability requirements in Technical Specification 3.0.3 and 3.0.4 do not apply to any of the requirements contained in this ODCM. The ODCM also contains descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Annual Radioactive Effluent Release Report required by the Technical Specifications.

The ODCM provides the parameters and methodology to be used in calculating offsite doses resulting from radioactive effluents, in the calculation of gaseous effluent monitor Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. Included are methods for determining air, whole body, and organ dose at the controlling location due to plant effluents to assure compliance with the regulatory requirements detailed in the ODCM. Methods are included for performing dose projections to assure compliance with the gaseous treatment system operability sections of the ODCM. The ODCM utilizes information from NRC Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," October 1977, and NRC NUREG 0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978. NUREG 0133 utilizes some of the key information in Regulatory Guide 1.109 to provide methods which were used in the preparation of the radiological effluent Technical Specifications and which have now been transferred to the ODCM in accordance with NRC Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program," January 31, 1989, and NUREG 1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors," Generic Letter 89-01, Supplement No. 1, April 1991. Further guidance for the implementation of the new 10 CFR Part 20, effective January 1, 1994, was obtained from the Federal Register, Vol. 58, December 23, 1993. It is recognized that this is only draft guidance, however, it is the only guidance for referencing the new 10 CFR 20 in the ODCM.

1.1 Liquid Effluent Pathways

Dose calculation methodology for radioactive liquid effluents is not included in this manual due to the desert location of the plant, the hydrology of the area, and the fact that there are no liquid releases to areas at or beyond the SITE BOUNDARY during normal operation. All liquid discharges to the onsite evaporation ponds are controlled by Section 3.2. The impact of postulated accidental seepages on the groundwater system, and in particular on the existing wells located in the 5-mile zone around the site area has been calculated and analyzed in Section 2.4.13.3 of the PVNGS FSAR.

If plant operating conditions become such that the likelihood of a liquid effluent pathway is created, then dose calculation methodology for this pathway will be added to this manual.

1.2 Gaseous Effluent Pathways

All gaseous effluents are treated as ground level releases and are considered to be "long-term" as discussed in NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants." This includes the containment purge and Waste Gas Decay Tank releases as well as the normal ventilation system and condenser vacuum exhaust releases. All releases are either greater than 500 hours in duration or are made at random, not depending upon atmospheric conditions or time of day. The releases are lumped together and calculated as an entity. Historical annual average X/Q values are used throughout this manual for all gaseous effluent setpoint and dose calculations. Airborne releases are further subdivided into two subclasses:

1.2.1 Iodine-131, Iodine-133, Tritium and Radionuclides in Particulate Form with Half-lives Greater than Eight Days

In this model, a controlling location is identified for assessing the maximum exposure to a MEMBER OF THE PUBLIC for the various pathways and to critical organs. Infant exposure occurs through inhalation and any actual milk pathway. Child, teenager and adult exposure derives from inhalation, consumed vegetation pathways, and any actual milk and meat pathways. Dose to each of the seven organs listed in Regulatory Guide 1.109 (bone, liver, total body, thyroid, kidney, lung and GI-LLI) are computed from individual nuclide contributions in each sector. The largest of the organ doses in any sector is compared to 10 CFR 50, Appendix I design objectives. The release rates of these nuclides will be converted to instantaneous dose rates for comparison to the limits of 10 CFR 20.

1.2.2 Noble Gases

The air dose from both the beta and gamma radiation component of the noble gases will be assessed and compared to the 10 CFR 50, Appendix I design objectives. The noble gas release rate will be converted to instantaneous dose rates for comparison to the limits of 10 CFR 20.

Section 2.0 of this manual discusses the methodology to be used in determining effluent monitor alarm/trip setpoints to assure compliance with the 10 CFR Part 20 limits as implemented in Section 3.0. Section 4.0 discusses the methods to assure releases are As Low As Reasonably Achievable (ALARA) in accordance with Appendix I to 10 CFR Part 50. Methods are described in Section 5.0 for determining the annual cumulative dose to a MEMBER OF THE PUBLIC from gaseous effluents and direct radiation to assure compliance with 40 CFR Part 190.

The requirements for the Annual Radiological Effluent Release Report and the Radiological Environmental Monitoring Program, including the Annual Land Use Census and the Interlaboratory Comparison Program, and the Annual Environmental Report are described in Sections 6.0 and 7.0 of this manual.

1.3 Nuisance Pathways

This section addresses the potential release pathways which should not contribute more than 10% of the doses evaluated in this manual. Table 1-1 lists examples of potential release pathways. The ODCM methodology for calculation of doses will be applied to an applicable release pathway if a likely potential arises for contributing more than 10% of the doses evaluated in this manual.

TABLE 1-1

NUISANCE PATHWAYS

(EXAMPLES)

Evaporation Pond

Cooling Towers

Laundry/Decon Building Exhaust

Unmonitored Secondary System Steam Vents/Reliefs

Turbine Building Ventilation Exhaust

Unmonitored Tank Atmospheric Vents

Dry Active Waste Processing and Storage (DAWPS) Building

Respirator Cleaning Facility

Secondary Side Decontamination Equipment

Low Level Radioactive Material Storage Facility

1.4 Meteorology

Historical annual average atmospheric dispersion (X/Q) and deposition (D/Q) data, based on nine years of meteorological data, and given in Table 3-2 for each of the three nuclear generating units are used to demonstrate compliance with the ODCM Requirements. These Requirements include:

Section 2.0	Gaseous Effluent Monitor Setpoints;
Section 3.0	Gaseous and Liquid Effluent - Dose Rate
Section 4.0	Gaseous and Liquid Effluent - Dose
Section 5.0	Total Dose and Dose to Public Onsite

Sections 2.0 and 3.0 specify utilizing the highest X/Q or D/Q meteorological dispersion parameter at the Site Boundary for any of the three units as applicable. Using the highest dispersion parameter for any of the units provides a conservative assumption to assure compliance with the higher 10 CFR Part 20 limits.

Section 4.0 specifies utilizing the highest X/Q at the Site Boundary for the particular unit, from Table 3-2 for noble gases. The highest X/Q and D/Q are utilized for the particular unit's releases as applicable for gases other than noble gases (iodines, particulates, and tritium) for the controlling pathway's location (site boundary using Table 3-2 or other controlling locations using Table 4-16, 4-17, or 4-18).

Section 5.0 specifies utilizing the highest X/Q for the particular unit's releases at the controlling location from Table 4-16, 4-17, or 4-18, for noble gases. The highest X/Q and D/Q are utilized for the particular unit's releases as applicable for gases other than noble gases at the controlling pathway's location using Table 4-16, 4-17, or 4-18.

Section 7.0 requires that the meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses.

2.0 GASEOUS EFFLUENT MONITOR SETPOINTS

2.1 Requirements: Gaseous Monitors

The radioactive gaseous effluent monitoring instrumentation channels shown in Table 2-1 shall be OPERABLE with their alarm/trip setpoints set to ensure that the dose requirements in Section 3.0 are not exceeded. The alarm/trip setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in Section 2.1.2.

Applicability: As shown in Table 2-1.

Action:

a. With the low range radioactive gaseous effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above Requirement, immediately suspend the release of radioactive gaseous effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.

b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 2-1. Restore the inoperable instrumentation to OPERABLE status within 30 days or, if unsuccessful, explain in the next Annual Radioactive Effluent Release Report why this inoperability was not corrected within the time specified.

2.1.1 Surveillance Requirements

a. Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 2-2.

TABLE 2-1

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
1. GASEOUS RADWASTE SYSTEM			
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release #RU-12	1	#	35
b. Flow Rate Monitor	1	#	36
2. NOT USED			
3. DELETED			
4. PLANT VENT SYSTEM			
A. Low Range Monitors			
a. Noble Gas Activity Monitor #RU-143	1	*	37
b. Iodine Sampler	1	*	40
c. Particulate Sampler	1	*	40
d. Flow Rate Monitor	1	*	36
e. Sampler Flow Rate Measuring Device	1	*	36
B. High Range Monitors			
a. Noble Gas Activity Monitor #RU-144	1	*	42
b. Iodine Sampler	1	*	42
c. Particulate Sampler	1	*	42
d. Sampler Flow Rate Measuring Device	1	*	42

TABLE 2-1 (Continued)

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABILITY	ACTION
5. FUEL BUILDING VENTILATION SYSTEM			
A. Low Range Monitors			
a. Noble Gas Activity Monitor #RU-145	1	##	37, 41
b. Iodine Sampler	1	##	40
c. Particulate Sample	1	##	40
d. Flow Rate Monitor	1	##	36
e. Sampler Flow Rate Measuring Device	1	##	36
B. High Range Monitors			
a. Noble Gas Activity Monitor #RU-146	1	##	42
b. Iodine Sampler	1	##	42
c. Particulate Sample	1	##	42
d. Sampler Flow Rate Measuring Device	1	##	42

Table 2-1 (Continued)

TABLE NOTATION

* At all times.
** During GASEOUS RADWASTE SYSTEM operation
*** Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s).
\# During waste gas release.
\#\# In MODES 1, 2, 3, and 4 or when irradiated fuel is in the fuel storage pool.

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 provided that prior to initiating the release:

a. At least two independent samples of the tanks 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;

Otherwise, suspend release 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 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, effluent releases via this pathway may continue provided the actions of (a) or (b) or (c) are performed:

a. Initiate the Preplanned Alternate Sampling Program to monitor the appropriate parameter(s).

b. Place moveable air monitors in-line.

c. Either take grab samples at least once per 12 hours, OR obtain gas channel monitor readings locally at least once per 12 hours if the channel is functional locally but inoperable due to loss of communication with the minicomputer. The surveillance requirements of Section 2.1.1 must be performed at the required frequencies for the channel to be functional locally.

ACTION 38 - NOT USED

ACTION 39 - NOT USED

ACTION 40 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via the effected pathway may continue provided samples are continuously collected with auxiliary sampling equipment as required in Table 3-1 within one hour after the channel has been declared inoperable.

ACTION 41 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirements, comply with Technical Requirements Manual TLCO 3.3.108.

Table 2-1 (Continued)

TABLE NOTATION

ACTION 42 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement restore the channel to OPERABLE status within 72 hours or:

a. Initiate the Preplanned Alternate Sampling Program to monitor the appropriate parameter(s) when it is needed.

b. Prepare and submit a Special Report to the Commission within 30 days following the event outlining the action(s) taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

TABLE 2-2

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODE IN WHICH SURVEILLANCE IS REQUIRED
1. GASEOUS RADWASTE SYSTEM					
a. Noble Gas Activity Monitor - Providing Alarm and Automatic Termination of Release RU-12	P	P(7)	R(3)	Q(1),(2),P###	#
b. Flow Rate Monitor	P	N.A.	R	Q,P###	#
2. DELETED					
3. DELETED					
4. PLANT VENT SYSTEM (RU-143 and RU-144)					
a. Noble Gas Activity Monitor	D(5)	M(7)	R(3)	Q(2)	*
b. Iodine Sampler	N.A.	N.A.	N.A.	N.A.	*
c. Particulate Sampler	N.A.	N.A.	N.A.	N.A.	*
d. Flow Rate Monitor	D(6)	N.A.	R	Q	*
e. Sampler Flow Rate Measuring Device	D(6)	N.A.	R	Q	*
5. FUEL BUILDING VENTILATION SYSTEM (RU-145 and RU-146)					
a. Noble Gas Activity Monitor	D(5)	M(7)	R(3)	Q(2)	##
b. Iodine Sampler	N.A.	N.A.	N.A.	N.A.	##
c. Particulate Sample	N.A.	N.A.	N.A.	N.A.	##
d. Flow Rate Monitor	D(6)	N.A.	R	Q	##
e. Sampler Flow Rate Measuring Device	D(6)	N.A.	R	Q	##

Table 2-2 (Continued)

TABLE NOTATION

* At all times.

** During GASEOUS RADWASTE SYSTEM operation

*** Whenever the condenser air removal system is in operation, or whenever turbine glands are being supplied with steam from sources other than the auxiliary boiler(s).

\# During waste gas release.

\#\# In MODES 1, 2, 3, and 4 or when irradiated fuel is in the fuel storage pool.

\#\#\# Functional test should consist of, but not be limited to, a verification of system isolation capability by the insertion of a simulated alarm condition.

(1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway occurs if the instrument indicates measured levels above the alarm/trip setpoint.

(2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:

1. Instrument indicates measured levels above the alarm setpoint.
2. Circuit failure.
3. Instrument indicates a downscale failure.
4. Instrument controls not set in operate mode.

(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 may be used in lieu of the reference standards associated with the initial calibration.

(4) NOT USED

(5) The channel check for channels in standby status shall consist of verification that the channel is on-line and reachable.

(6) Daily channel check not required for flow monitors in standby status.

(7) LED may be utilized as the check source in lieu of a source of increased activity.

2.1.2 Implementation of the Requirements

The general methodology for establishing low range gaseous effluent monitor setpoints is based upon a site release rate limit in μCi/sec derived from site specific meteorological dispersion conditions, radioisotopic distribution, and whole body and skin dose factors. The high alarm of the low range monitors will alarm/trip when the release rate from an individual vent will result in exceeding the limits in Section 3.1. 80% of Section 3.1 limits is considered to be the site release rate limit. The site release rate limit will be allocated among the licensed units' release points. The unit release rate limit will then be utilized for the determination of gaseous effluent monitor setpoints. A fraction of the unit release rate limit is then allotted to each release point and its monitor alert setpoint (μCi/cc) is derived using actual or fan design flow rates.

Administrative values are used to reduce each setpoint to account for the potential activity in other releases. These administrative values shall be reviewed based on actual release data.

For the purpose of implementation of Section 2.1, the alarm setpoint levels for low range effluent noble gas monitors are established to ensure that personnel are alerted when the noble gas releases are at a rate such that if the releases would continue for the year they would approach the total body dose rate of 500 mrem/yr and 3000 mrem/yr skin dose in Section 3.1. The equations in Section 3.1 of this manual provide the methodology for calculating the gaseous effluent dose rate.

The evaluation of doses due to releases of radioactive material can be simplified by the use of equivalent dose factors as defined in Section 2.1.2.1.

The equivalent dose factors will be evaluated periodically to assure that the best information on isotopic distribution is being used for the dose equivalent value.

2.1.2.1 Equivalent Dose Factor Determination

The equivalent whole body dose factor is calculated as follows:

$$K_{eq} = \sum_i [(K_i)(f_i)] \tag{2-1}$$

Where:

K_{eq} = the equivalent whole body dose factor weighted by historical radionuclide distribution in releases in mrem/yr per $\mu Ci/m^3$.

K_i = the whole body dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

f_i = the fraction of noble gas radionuclide i in the total noble gas radionuclide mix.

The equivalent skin dose factor is calculated as follows:

$$(L + 1.1M)_{eq} = \sum_i [(L_i + 1.1M_i)(f_i)] \tag{2-2}$$

Where:

$(L+1.1M)_{eq}$ = the equivalent skin dose factor due to beta and gamma emissions from all noble gases released, weighted by the historical radionuclide distribution in releases in mrem/yr per $\mu Ci/m^3$.

L_i = the skin dose factor due to the beta emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

M_i = the air dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrad/yr per $\mu Ci/m^3$ from Table 3-3.

f_i = the fraction of noble gas radionuclide i in the total noble gas radionuclide mix.

1.1 = unit conversion constant of 1.1 mrem/mrad converts air dose to skin dose.

2.1.2.2 Site Release Rate Limit (Q_{SITE})

The release rates corresponding to 80% of the whole body (Q_{WB}) and skin (Q_{SK}) dose rate limits are calculated using the equivalent dose factors defined in Section 2.1.2.1. The site release rate limit (Q_{SITE}) is the lower of Q_{WB} or Q_{SK}, thus assuring that the more restrictive dose rate limit will not be exceeded.

The Q_{SITE} is established as follows:

$$Q_{SITE,WB} = \frac{(D_{WB})(0.8)}{(K_{eq})(X/Q)_{SITE}} \qquad (2\text{-}3)$$

Where:

$Q_{SITE,WB}$ = the site release rate, in µCi/sec, that would deliver a dose rate 80% of the whole body dose rate limit, D_{WB}.

D_{WB} = whole body dose rate limit of 500 mrem/yr.

K_{eq} = equivalent whole body dose factor, in mrem/yr per µCi/m^3 weighted by the historical radionuclide distribution.

$(X/Q)_{SITE}$ = 8.91E-06, the highest calculated annual average dispersion parameter, in sec/m^3, at the Site Boundary for any of the 3 units, from Table 3-2.

0.8 = administrative factor to compensate for any unexpected variability in the radionuclide mix and to ensure that Site Boundary dose rate limits will not be exceeded.

$$Q_{SITE,SK} = \frac{(D_{SK})(0.8)}{(L + 1.1M)_{eq}(X/Q)_{SITE}} \qquad (2\text{-}4)$$

Where:

$Q_{SITE,SK}$ = the site release rate limit, in µCi/sec, that would deliver a dose rate 80% of the skin dose rate limit, D_{SK}.

D_{SK} = skin dose rate limit of 3000 mrem/yr.

$(L+1.1M)_{eq}$ = equivalent skin dose factor, in mrem/yr per µCi/m^3, weighted by the radionuclide distribution.

$(X/Q)_{SITE}$ = 8.91E-06, the highest calculated annual average dispersion parameter, in sec/m^3, at the Site Boundary for any of the three units, from Table 3-2.

0.8 = administrative factor to compensate for any unexpected variability in the radionuclide mix and to ensure that Site Boundary dose rate limits will not be exceeded.

After determination of the Q_{SITE} whole body and skin dose rates (equations 2-3 and 2-4, respectively), the most conservative result will be used as Q_{SITE}, the site release rate limit.

2.1.2.3 Unit Release Rate Limits (Q_{UNIT})

Typically Q_{SITE} will be divided equally among operating units. If operational history dictates a larger fraction of the Q_{SITE} be assigned to a specific unit then a weighted average of each unit's contribution to the Q_{SITE} will be utilized to determine the Q_{UNIT}.

$$Q_{UNIT} = (f_{UNIT})(Q_{SITE}) \quad (2\text{-}5)$$

Where:

Q_{UNIT} = unit release rate limit, in µCi/sec.

f_{UNIT} = the fraction (≤ 1) of noble gas historically released from a specific operating unit to the total of all noble gas released from the site.

Q_{SITE} = the site release rate limit, in µCi/sec determined in Section 2.1.2.2.

2.1.2.4 Setpoint Determination

To comply with the requirements in Section 2.1, the alarm/trip setpoints can now be established using the unit release rate limit (Q_{UNIT}) to ensure that the noble gas releases do not exceed the dose rate limits.

To allow for multiple sources of releases from different or common release points, the effluent monitor setpoint includes an administrative factor which allocates a percentage of the unit release rate limit to each of the release sources. Monitor setpoints will also be adjusted in accordance with Nuclear Administrative and Technical Manual procedures to account for monitor-specific characteristics.

<u>Monitors RU-143 and RU-145</u>

The alarm/trip setpoint for Monitors RU-143 and RU-145 is calculated as follows:

$$\text{Monitor Setpoint} \leq \frac{(Q_{UNIT})(a)}{(472)(\text{Flow Rate})} \quad (2\text{-}6)$$

Where:

Monitor

Setpoint = the setpoint for the effluent monitor, in µCi/cc, which provides a safe margin of assurance that the allowable dose rate limits will not be exceeded.

Q_{UNIT} = unit release rate limit, in µCi/sec, as determined in Section 2.1.2.3.

Flow Rate = the flow rate, in cfm, from flow rate monitors or the fan design flow rate for the release source under consideration.

472 = conversion factor, cubic centimeter/second per cubic feet/minute.

a = fraction of Q_{UNIT} allocated for a specific release point. The sum of these administrative values shall be less than or equal to one.

Monitor RU-12

The alarm/trip setpoint for Monitor RU-12, the Waste Gas Decay Tank Monitor, is calculated as follows:

$$\text{Monitor setpoint} \leq \frac{[(Q_{UNIT})(a)(0.9) - (H)(PF)(472)]}{(\text{Flow Rate})(472)} \qquad (2\text{-}7)$$

Where:

Monitor

Setpoint = the setpoint for the monitor, in µCi/cc at STP, which provides a safe margin of assurance that the allowable dose rate limits will not be exceeded.

Q_{UNIT} = unit release rate limit, in µCi/sec, as determined in Section 2.1.2.3.

Flow Rate = flow rate, in cfm at STP at which the tank will be released.

PF = the current process flow of the plant vent in CFM.

H = the current plant vent monitor concentration in µCi/cc.

a = fraction of Q_{UNIT} allocated for a specific release point. This administrative value should be equal to or less than the administrative value used for the Plant Vent.

0.9 = an administrative value to account for potential increases in activity from other contributors to the same release point.

472 = conversion factor, cubic centimeter/second per cubic feet/minute.

If there is no release associated with this monitor, the monitor setpoint should be established as close as practical to background to prevent spurious alarms, and yet assure an alarm should an inadvertent release occur.

2.1.2.5 Monitor Calibration

The Radiation Level Conversion Factor (RLF) for each monitor is entered into the Radiation Monitoring System Database and may change whenever the monitor is calibrated. Calibration is performed in accordance with Nuclear Administrative and Technical Manual procedures.

3.0 GASEOUS AND LIQUID EFFLUENT DOSE RATES

3.1 Requirements: Gaseous Effluents

The dose rate due to radioactive materials released in gaseous effluents from the site (see Figure 6-4 and Figure 6-5) shall be limited to the following:

a. For noble gases: Less than or equal to 500 mrems/yr to the total body and less than or equal to 3000 mrems/yr to the skin, and

b. For I-131 and I-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:

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

3.1.1 Surveillance Requirements

a. The dose rate due to noble gases in gaseous effluents shall be determined to be within the above limits in accordance with the methods contained in Section 3.1.2.

b. The dose rate due to I-131, I-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 methods contained in Section 3.1.2 by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 3-1.

3.1.2 Implementation of the Requirements

Noble Gases

Noble gas activity monitor setpoints are established at release rates which permit corrective action to be taken before exceeding the 10 CFR 20 annual dose limits as described in Section 2.0. The requirements for sampling and analysis of continuous and batch effluent releases are given in Table 3-1. The methods for sampling and analysis of continuous and batch effluent releases are given in the Nuclear Administrative and Technical Manual procedures. The dose rate in unrestricted areas shall be determined using the following equations.

For whole body dose rate:

$$D_{WB} = \sum_i [(K_i)(X/Q)_{SITE}(Q_i)] \quad (3\text{-}1)$$

For skin dose rate:

$$D_{SK} = \sum_i [(L_i + 1.1M_i)(X/Q)_{SITE}(Q_i)] \quad (3\text{-}2)$$

Where:

K_i = the whole body dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

Q_i = the release rate of radionuclide i, in $\mu Ci/sec$.

$(X/Q)_{SITE}$ = 8.91E-06, the highest calculated annual average dispersion parameter, in sec/m^3, for any of the three units, from Table 3-2.

D_{WB} = the annual whole body dose rate (mrem/yr.).

L_i = the skin dose factor due to the beta emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

M_i = the air dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrad/yr per $\mu Ci/m^3$ from Table 3-3.

D_{SK} = the annual skin dose rate (mrem/yr).

1.1 = unit conversion constant of 1.1 mrem/mrad converts air dose to skin dose.

I-131, I-133, tritium and radionuclides in particulate form with half-lives greater than 8 days

The methods for sampling and analysis of continuous and batch releases for I-131, I-133, tritium and radionuclides in particulate form with half-lives greater than 8 days, are given in the applicable Nuclear Administrative and Technical Manual procedures. Additional monthly and quarterly analyses shall be performed in accordance with Table 3-1. The total organ dose rate in unrestricted areas shall be determined by the following equation:

$$D_o = \sum_i [(P_i)(X/Q)_{SITE}(Q_i)] \qquad (3\text{-}3)$$

Where:

P_i = the dose factor, in mrem/yr per $\mu Ci/m^3$, for radionuclide i, for the inhalation pathway, from Table 3-4.

$(X/Q)_{SITE}$ = 8.91E-06, the highest calculated annual average dispersion parameter, in sec/m^3, at the Site Boundary, for any of the three units,

Q_i = the release rate of radionuclide i, in $\mu Ci/sec$

D_o = the total organ dose rate (mrem/yr).

TABLE 3-1

RADIOACTIVE GASEOUS WASTE SAMPLING AND ANALYSIS PROGRAM

GASEOUS RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) (µCi/ml)[a]
A. Waste Gas Storage	P Each Tank Grab Sample	P Each Tank	Principal Gamma Emitters[g]	1.0E-04
B. Containment Purge	P Each Purge[b,c] Grab Sample	P Each Purge[b,c]	Principal Gamma Emitters[g]	1.0E-04
			H-3	1.0E-06
C. 1. DELETED 2. Plant Vent 3. Fuel Bldg. Exhaust	M[b,e] Grab Sample	M[b]	Principal Gamma Emitters[g]	1.0E-04
			H-3	1.0E-06
	Continuous[f]	4/M[d] Charcoal Sample	I-131	1.0E-12
			I-133	1.0E-10
	Continuous[f]	4/M[d] Particulate Sample	Principal Gamma Emitters[g] (I-131, Others)	1.0E-11
	Continuous[f]	M Composite Particulate Sample	Gross Alpha	1.0E-11
	Continuous[f]	Q Composite Particulate Sample	Sr-89, Sr-90	1.0E-11
D. All Radwaste Types as listed in A., B., and C., above.	Continuous[f]	Noble Gas Monitor	Noble Gases Gross Beta or Gamma	1.0E-06

Table 3-1 (Continued)

TABLE NOTATION

a The LLD is 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):

$$LLD = \frac{4.66\ s_b}{E * V * 2.22E6 * Y * \exp(-\lambda \Delta t)}$$

Where:

LLD is the a priori lower limit of detection as defined above (as µCi per unit mass or volume). Current literature defines the LLD as the detection capability for the instrumentation only and the MDC minimum detectable concentration, as the detection capability for a given instrument, procedure and type of sample.

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

E is the counting efficiency (as counts per transformation),

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

2.22E6 is the number of transformations per minute per microcurie,

Y is the fractional radiochemical yield (when applicable),

λ is the radioactive decay constant for the particular radionuclide, and

Δt is the elapsed time between the midpoint of sample collection and time of counting (for plant effluents, not environmental samples).

The value of s_b used in the calculation of the LLD for a detection system shall be based on the actual observed variance of the background counting rate or of the counting rate of the blank samples (as appropriate) rather than on an unverified theoretically predicted variance. In calculating the LLD for a radionuclide determined by gamma-ray spectrometry the background should include the typical contributions of other radionuclides normally present in the samples. Typical values of E, V, Y, and Δt should be used in the calculation.

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

Table 3-1 (Continued)

TABLE NOTATION

b Analyses shall also be performed following SHUTDOWN, STARTUP, or a THERMAL POWER change exceeding 15% of the RATED THERMAL POWER within a 1-hour period if 1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has increased more than a factor of 3; and 2) the noble gas activity monitor on the plant vent shows that effluent activity has increased by more than a factor of 3. If the associated noble gas vent monitor is inoperable, samples must be obtained as soon as possible. Analyses shall be performed within a four-hour period. This requirement does not apply to the Fuel Building Exhaust.

c Sampling and analyses shall also be performed at least once per 31 days when purging time exceeds 30 days continuous.

d Samples shall be changed at least 4 times a month and analyses shall be completed within 48 hours after changing (or after removal from sampler). When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10.

e Tritium grab samples shall be taken at least monthly from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.

f 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 Requirements 3.1, 4.1 and 4.2 of the ODCM.

g 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 gaseous emissions and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, Ce-141 and Ce-144 for particulate emissions. This list does not mean that only these nuclides are to be detected and reported. Other peaks which are measurable and identifiable, together with the above nuclides shall also be identified and reported in the Annual Radioactive Effluent Release Report.

TABLE 3-2

DISPERSION AND DEPOSITION PARAMETERS FOR LONG TERM RELEASES AT THE SITE BOUNDARY

DIRECTION	UNIT 1 DISTANCE (METERS)	UNIT 1 X/Q (SEC/m^3)	UNIT 1 D/Q (m^{-2})	UNIT 2 DISTANCE (METERS)	UNIT 2 X/Q (SEC/m^3)	UNIT 2 D/Q (m^{-2})	UNIT 3 DISTANCE (METERS)	UNIT 3 X/Q (SEC/m^3)	UNIT 3 D/Q (m^{-2})
N	1037	4.93E-06	9.24E-09	1318	3.85E-06	6.17E-09	1661	3.54E-06	4.86E-09
NNE	1057	4.14E-06	1.19E-08	1342	3.18E-06	7.93E-09	1693	2.86E-06	6.23E-09
NE	2206	2.84E-06	6.84E-09	2545	2.42E-06	5.34E-09	2756	2.21E-06	4.65E-09
ENE	1967	2.51E-06	4.43E-09	2206	2.22E-06	3.64E-09	2337	2.08E-06	3.30E-09
E	1927	2.56E-06	3.24E-09	2163	2.27E-06	2.66E-09	2290	2.14E-06	2.41E-09
ESE	1967	2.61E-06	2.46E-09	2067	2.32E-06	2.11E-09	2023	2.37E-06	2.10E-09
SE	2049	3.56E-06	2.36E-09	2101	3.47E-06	2.26E-09	2256	3.24E-06	2.00E-09
SSE	2730	3.80E-06	1.58E-09	3026	3.43E-06	1.32E-09	2786	3.72E-06	1.52E-09
S	3006	5.07E-06	1.78E-09	2699	5.16E-06	1.97E-09	2346	5.90E-06	2.51E-09
SSW	2258	6.52E-06	3.20E-09	1836	7.90E-06	4.56E-09	1607	8.91E-06	5.73E-09
SW	1487	7.47E-06	5.65E-09	1208	7.72E-06	6.88E-09	1057	8.68E-06	8.61E-09
WSW	1251	4.52E-06	5.93E-09	1014	5.55E-06	8.44E-09	889	5.34E-06	8.83E-09
W	1225	4.73E-06	9.49E-09	993	5.86E-06	1.34E-08	871	6.72E-06	1.67E-08
WNW	1244	3.76E-06	6.76E-09	1010	4.67E-06	9.60E-09	885	5.37E-06	1.19E-08
NW	1254	3.43E-06	5.87E-09	1191	3.62E-06	6.40E-09	1045	4.17E-06	7.98E-09
NNW	1069	3.70E-06	7.26E-09	1342	2.85E-06	4.87E-09	1561	2.93E-06	4.58E-09

Reference: Distances are from the PVNGS ER-OL, Table 2.3-33. Dispersion and Deposition parameters are from a September, 1985, calculation by NUS Corporation based on 9 years of meteorological data; NUS Corporation letter NUS-ANPP-1386, dated October 4, 1985.

TABLE 3-3

DOSE FACTORS FOR NOBLE GASES AND DAUGHTERS

Radionuclide	Whole Body Dose Factor K_i $\frac{mrem\text{-}m^3}{yr\text{-}\mu Ci}$	Skin Dose Factor L_i $\frac{mrem\text{-}m^3}{yr\text{-}\mu Ci}$	Gamma Air Dose Factor M_i $\frac{mrad\text{-}m^3}{yr\text{-}\mu Ci}$	Beta Air Dose Factor N_i $\frac{mrad\text{-}m^3}{yr\text{-}\mu Ci}$
Kr-83m	7.56E-02	----------	1.93E+01	2.88E+02
Kr-85m	1.17E+03	1.46E+03	1.23E+03	1.97E+03
Kr-85	1.61E+01	1.34E+03	1.72E+01	1.95E+03
Kr-87	5.92E+03	9.73E+03	6.17E+03	1.03E+04
Kr-88	1.47E+04	2.37E+03	1.52E+04	2.93E+03
Kr-89	1.66E+04	1.01E+04	1.73E+04	1.06E+04
Kr-90	1.56E+04	7.29E+03	1.63E+04	7.83E+03
Xe-13lm	9.15E+01	4.76E+02	1.56E+02	1.11E+03
Xe-133m	2.51E+02	9.94E+02	3.27E+02	1.48E+03
Xe-133	2.94E+02	3.06E+02	3.53E+02	1.05E+03
Xe-135m	3.12E+03	7.11E+02	3.36E+03	7.39E+02
Xe-135	1.81E+03	1.86E+03	1.92E+03	2.46E+03
Xe-137	1.42E+03	1.22E+04	1.51E+03	1.27E+04
Xe-138	8.83E+03	4.13E+03	9.21E+03	4.75E+03
Ar-41	8.84E+03	2.69E+03	9.30E+03	3.28E+03

Reference: Regulatory Guide 1.109, Table B-1.

TABLE 3-4

P_i VALUES FOR THE INHALATION PATHWAY

(mrem/yr/µCi/m^3)

NUCLIDE	Age Group	Organ	P_i
H-3	TEEN	LIVER	1.27E+03
CR-51	TEEN	LUNG	2.10E+04
MN-54	TEEN	LUNG	1.98E+06
FE-59	TEEN	LUNG	1.53E+06
CO-58	TEEN	LUNG	1.34E+06
CO-60	TEEN	LUNG	8.72E+06
ZN-65	TEEN	LUNG	1.24E+06
SR-89	TEEN	LUNG	2.42E+06
SR-90	TEEN	BONE	1.08E+08
ZR-95	TEEN	LUNG	2.69E+06
SB-124	TEEN	LUNG	3.85E+06
I-131	CHILD	THYROID	1.62E+07
I-133	CHILD	THYROID	3.85E+06
CS-134	TEEN	LIVER	1.13E+06
CS-137	CHILD	BONE	9.07E+05
BA-140	TEEN	LUNG	2.03E+06
CE-141	TEEN	LUNG	6.14E+05
CE-144	TEEN	LUNG	1.34E+07

3.2 Requirements: Secondary System Liquid Waste Discharges To Onsite Evaporation Ponds or Circulating Water System - Concentration

The concentration of radioactive material discharged from secondary system liquid waste to the circulating water system shall be limited to:

5.0E-07 µCi/ml for the principal gamma emitters (except Ce-144)

3.0E-06 µCi/ml for Ce-144

1.0E-06 µCi/ml for I-131

1.0E-03 µCi/ml for H-3

The concentration of radioactive material discharged from secondary system liquid waste to the onsite evaporation ponds shall be limited to:

2.0E-06 µCi/ml for Cs-134

2.0E-06 µCi/ml for Cs-137

The concentrations specified in 10 CFR Part 20.1001-20.2402, Appendix B, Table 2, Column 2, for all other isotopes

Applicability: At all times.

Action:

When any secondary system liquid waste discharge pathway concentration determined in accordance with the surveillance requirements given below exceeds the above Requirements, divert that discharge pathway to the liquid radwaste system without delay or terminate the discharge.

3.2.1 Surveillance Requirements

a. Secondary system liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 3-5.

3.2.2 Implementation of the Requirements

This requirement is implemented by Nuclear Administrative and Technical Manual procedures.

TABLE 3-5

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

Secondary System Liquid Release Pathway	Destination	Sampling & Analysis Frequency	Notes	Type Of Activity Analysis	Lower Limit Of Detection (LLD)[a] (µCi/ml)
1. Chemical Waste Neutralizer Tank (CWNT)[b]	retention basin	P Each Batch		Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	liquid radwaste	N. A.			
2. Steam Generator Blowdown Low TDS Sump[b]	circ. water	P Each Batch	1	Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	CWNT	N. A.			
3. Condensate					
a. Condensate Polishing Low TDS Sump[b]	circ. water	P Each Batch	3	Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	CWNT	N. A.			
b. Initial Backwash	(low TDS sump) to circ. water	P Each Discharge		Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	(low TDS sump) to CWNT	N. A.			
c. Pre-service rinse effluent	retention basin through SC-N-V069	P Each Discharge	2	Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	condenser through SC-N-UV232	N. A.			
d. Overboard condensate	circ water through CD-N-V194	P Each Discharge		Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	retention basin through SC-N-V079	P Each Discharge	2		
4. Turbine Building Sump[d]	retention basin	D Grab Sample	3	Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	CWNT	N. A.			

TABLE 3-5

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

Secondary System Liquid Release Pathway	Destination	Sampling & Analysis Frequency	Notes	Type Of Activity Analysis	Lower Limit Of Detection (LLD)[a] (µCi/ml)
5. North & South Condenser Area Sumps[d]	retention basin	D Grab Sample	3	Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
	CWNT	N. A.			
6. Steam Generator Blowdown to Retention Basin	retention basin through SC-N-V064	P Each Discharge	2	Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05
7. Retention Basin to Evaporation Pond	evaporation pond	P Each Batch		Principal Gamma Emitters[c] I-131 H-3	5.0E-07 1.0E-06 1.0E-05

1 Sampling and analysis are required only when concentration for chemical waste neutralizer tank or steam generator activity exceeds the requirement

2 RU-200 shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST at the frequencies shown in Table 3-6. The Alarm/Trip setpoints for RU-200 are set to ensure that the concentrations in the retention basins do not exceed the Requirement

3 Sampling and analysis are required only when concentration for chemical waste neutralizer tank or condensate activity exceeds the requirement

Table 3-5 (Continued)

TABLE NOTATION

a The LLD is defined 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:

$$LLD = \frac{4.66\ s_b}{E * V * 2.22E6 * Y * \exp(-\lambda\Delta t)}$$

Where:

LLD is the "a priori" lower limit of detection as defined above as microcuries per unit mass or volume,

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

E is the counting efficiency as counts per disintegration,

V is the sample size in units of mass or volume,

2.22E6 is the number of disintegrations per minute per microcurie,

Y is the fractional radiochemical yield when applicable,

λ is the radioactive decay constant for the particular radionuclide, and

Δt is the elapsed time between midpoint of sample collection and time of counting.

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

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

b 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.

c The principal gamma emitters for which the LLD specification applies include the following radionuclides: Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, Cs-134, Cs-137, and Ce-141. Ce-144 shall also be measured, but with an LLD of 3.0E-06. 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 Annual Radioactive Effluent Release Report.

d 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

TABLE 3-6

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

Instrument	Channel Check	Source Check	Channel Calibration	Channel Functional Test	Mode in which Surveillance is Required
RU-200	P	N. A.	R	Q	See Table 3-7

TABLE 3-7

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

Secondary System Liquid Release Pathway	Mode in which Surveillance is Required	Action if RU-200 is inoperable
Pre-service rinse to retention basins	At All Times	Obtain grab sample at least once per 12 hours and analyze in accordance with section 3.2
Condensate overboard to retention basins	1-4	Obtain grab sample at least once per 12 hours and analyses in accordance with section 3.2
Steam Generator Blowdown/Drain to retention basins	At All Times	Modes 1-4: Suspend the release Modes 5,6 & defueled: Obtain grab sample at least once per 12 hours and analyze in accordance with section 3.2

4.0 GASEOUS & LIQUID EFFLUENTS - DOSE

4.1 Requirements: Noble Gases

The air dose due to noble gases released in gaseous effluents, from each reactor unit to areas at and beyond the SITE BOUNDARY (see Figure 6-4 and Figure 6-5) shall be limited to the following:

a. During any calendar quarter: Less than or equal to 5 mrads for gamma radiation and less than or equal to 10 mrads for beta radiation and,

b. During any calendar year: Less than or equal to 10 mrads for gamma radiation and less than or equal to 20 mrads for beta radiation.

Applicability: At all times.

Action:

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, 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.

4.1.1 Surveillance Requirements

a. Cumulative dose contributions for the current calendar quarter and current calendar year for noble gases shall be determined in accordance with the methodology contained in Section 4.1.2 at least once per 31 days.

4.1.2 Implementation of the Requirement: Noble Gas

The air dose in unrestricted areas beyond the site boundary due to noble gases released in gaseous effluents from each unit during any specified time period shall be determined by the following equations:

For gamma radiation:

$$D\gamma_u = (3.17E\text{-}08)\ \Sigma_i\ [(M_i)\ (X/Q)_{UNIT}(Q_i)] \qquad (4\text{-}1)$$

For beta radiation:

$$D\beta_u = (3.17E\text{-}08)\ \Sigma_i\ [(N_i)\ (X/Q)_{UNIT}(Q_i)] \qquad (4\text{-}2)$$

Where:

M_i = the air dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrad/yr per $\mu Ci/m^3$ from Table 3-3.

N_i = the air dose factor due to beta emissions for each identified noble gas radionuclide i, in mrad/yr per $\mu Ci/m^3$ from Table 3-3.

$(X/Q)_{UNIT}$ = the highest calculated annual average dispersion parameter, in sec/m^3, at the site boundary for the particular Unit, from Table 3-2. Optionally, the highest value may be used for any Unit calculation.

=7.47E-06 from Unit 1
=7.90E-06 from Unit 2
=8.91E-06 from Unit 3

$D\gamma_u$ = the total gamma air dose, for the particular unit, in mrad, due to noble gases released in gaseous effluents for a specified time period at the SITE BOUNDARY.

$D\beta_u$ = the total beta air dose, for the particular unit, in mrad, due to noble gases released in gaseous effluents for a specified time period at the SITE BOUNDARY.

Q_i = the integrated release, from the particular unit, in μCi, of each identified noble gas radionuclide i, in gaseous effluents for a specified time period.

3.17E-08 = the inverse of seconds in a year (yr/sec).

The cumulative gamma air dose and beta air dose for a quarterly or annual evaluation shall be based on the calculated dose contribution from each specified time period occurring during the reporting time period.

4.2 Requirement: Iodine-131, Iodine-133, Tritium, and All Radionuclides in Particulate Form With Half-Lives Greater Than 8 Days

The dose to a MEMBER OF THE PUBLIC from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 6-4 and Figure 6-5) shall be limited to the following:

a. During any calendar quarter: Less than or equal to 7.5 mrems to any organ and,

b. During any calendar year: Less than or equal to 15 mrems to any organ.

Applicability: At all times.

Action:

With the calculated dose from the release of iodine-131, iodine-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, a Special Report that identifies the cause(s) for exceeding the limit 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.

4.2.1 Surveillance Requirements

a. Cumulative dose contributions for the current calendar quarter and current calendar year for iodine-131, iodine-133, tritium, and radionuclides in particulate form with half-lives greater than 8 days shall be determined in accordance with the methodology and parameters contained in Section 4.2.2 at least once per 31 days.

4.2.2 Implementation of the Requirement

The organ dose to an individual from I-131, I-133, tritium, and all radionuclides in particulate form, with half-lives greater than eight days, in gaseous effluents released to unrestricted areas from each reactor unit is calculated using the following expressions:

$$D_{ou} = (3.17E\text{-}08)\ \Sigma_i\ [\Sigma_k\ (R_{ik}\ W_k)\ (Qi)] \qquad (4\text{-}3)$$

Where:

D_{ou} = the total accumulated organ dose from gaseous effluents for a particular unit, to a MEMBER OF THE PUBLIC, in mrem, at the SITE BOUNDARY or at the controlling location.

Q_i = the quantity of radionuclide i, in µCi, released in gaseous effluents from a particular unit.

R_{ik} = the dose factor for each identified radionuclide i, for pathway k (for the inhalation pathway in mrem/yr per µCi/m^3 and for the food and ground plane pathways in m^2 - mrem/yr per µCi/sec, except H-3, which has units of mrem/yr per µCi/m^3) at the controlling location. The R_{ik}'s for each age group are given in Tables 4-1 through 4-15.

3.17E-08 = the inverse of seconds per year (yr/sec).

W_k = the highest annual average dispersion or deposition parameter for the particular Unit, used for estimating the dose at the site boundary or to a MEMBER OF THE PUBLIC at the controlling location for the particular Unit. Optionally, the highest value may be used for any Unit calculation.

= $(X/Q)_{UNIT}$, in sec/m^3 for the inhalation pathway and for all tritium calculations, for organ dose at the site boundary, from Table 3-2.

=7.47E-06 from Unit 1
=7.90E-06 from Unit 2
=8.91E-06 from Unit 3

= $(X/Q)_{UNIT}$, in sec/m^3 for the inhalation pathway and for all tritium calculations, for organ dose at the controlling location, from Table 4-16, 4-17 or 4-18.

=2.92E-06 from Unit 1
=2.19E-06 from Unit 2
=2.31E-06 from Unit 3

= $(D/Q)_{UNIT}$, in m^{-2}, for the food and ground plane pathways, for organ dose at the site boundary, from Table 3-2.

=1.19E-08 from Unit 1
=1.34E-08 from Unit 2
=1.67E-08 from Unit 3

= $(D/Q)_{UNIT}$, in m^{-2}, for the food and ground plane pathways, for organ dose at the controlling location, from Table 4-16, 4-17, or 4-18.

=3.25E-09 from Unit 1
=3.88E-10 from Unit 2
=4.21E-10 from Unit 3

Residences, vegetable gardens and milk animals located within 5 miles of the site will be identified during the annual land use census. The controlling pathway and location will be identified and will be used for all MEMBER OF THE PUBLIC dose evaluations.

The R_i values were calculated in accordance with the methodologies in NUREG-0133. The following site specific information was used to calculate R_i:

	Value
The length of the grazing season for milk animals (f_s). Ref. ER-OL, Section 2.1.3.4.3	0.75
The length of the grazing season for meat animals (f_s). Ref. ER-OL, Section 2.1.3.4.4	0.25
The fraction of daily feed derived from pasture while on pasture for milk animals (f_p). Ref. ER-OL, Section 2.1.3.4.3	0.35
The fraction of daily feed derived from pasture while on pasture for meat animals (f_p). Ref. ER-OL, Section 2.1.3.4.3	0.05
The fraction of year vegetables are grown, (f_l) approximation. Ref. ER-OL, Section 2.1.3.4, Table 2.1-8.	0.667
The annual absolute humidity (g/m^3), H, Ref. UFSAR, Table 2.3-16	6

4.3 Requirements: Gaseous Radwaste Treatment

The GASEOUS RADWASTE SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected gaseous effluent air doses due to gaseous effluent releases, from each reactor unit, from the site (see Figure 6-4 and Figure 6-5) when averaged over 31 days, would exceed 0.2 mrad for gamma radiation and 0.4 mrad for beta radiation. The VENTILATION EXHAUST TREATMENT SYSTEM shall be used to reduce radioactive materials in gaseous waste prior to their discharge when the projected doses due to gaseous effluent releases, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 6-4 and Figure 6-5) when averaged over 31 days would exceed 0.3 mrem to any organ of a MEMBER OF THE PUBLIC.

Applicability: At all times:

Action:

With radioactive gaseous waste being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days, a Special Report which includes the following information:

a. Identification of the inoperable equipment or subsystems and the reason for 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.

4.3.1 Surveillance Requirements

a. Doses due to gaseous releases from the site shall be projected at least once per 31 days, in accordance with the methodology and parameters in Section 4.3.2.

4.3.2 Implementation of the Requirement

Where possible, consideration for expected operational evolutions (i.e., outages, etc.) should be taken in the dose projections.

Dose Projection - Noble Gases

The air dose, in mrads is determined using the methodology described in Section 4.1.2 of this manual. This information is used to determine an air dose projection for the next 31 days using the following equations:

For gamma radiation:

$$31 \text{ day } \gamma = D\gamma \pm CD\gamma \quad (4\text{-}4)$$

For beta radiation:

$$31 \text{ day } \beta = D\beta \pm CD\beta \quad (4\text{-}5)$$

Where:

$D\gamma$ = the total gamma air dose in mrads at the site boundary due to noble gases released in gaseous effluents for the previous 31 days.

$D\beta$ = the total beta air dose in mrads at the site boundary due to noble gases released in gaseous effluents for the previous 31 days.

$CD\gamma$ = any current or projected change in gamma air dose, in mrads, due to noble gases released in gaseous effluents, which could have a significant impact on 31 day γ.

$CD\beta$ = any current or projected change in beta air dose, in mrads, due to noble gases released in gaseous effluents, which could have a significant impact on 31 day β.

When performing the 31 day dose projection using the Gaseous Radioactive Effluent Tracking System (GRETS), $D\gamma$ and $D\beta$ will include the dose from any release permits that fall within the selected 31 day time period. As a result, the actual dose projection will often be based on the accumulated dose for a time period greater than 31 days.

Dose Projection - I-131, I-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days

The organ dose, in mrem, is determined using the methodology described in Section 4.2.2 of this manual. This information is used to determine an organ dose projection for the next 31 days using the following equation:

$$31day_o = D_o \pm CD_o \quad (4\text{-}6)$$

Where:

D_o = the total organ dose due to I-131, I-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days in mrem, released in gaseous effluents for the previous 31 days.

CD_o = any current or projected change in organ dose, in mrem, which could have a significant impact on 31 day_o.

When performing the 31 day dose projection using the Gaseous Radioactive Effluent Tracking System (GRETS), D_o will include the dose from any release permits that fall within the selected 31 day time period. As a result, the actual dose projection will often be based on the accumulated dose for a time period greater than 31 days.

TABLE 4-1

Ri DOSE CONVERSION FACTORS FOR THE GROUND PLANE PATHWAY

NUCLIDE	T. BODY	SKIN
H-3	0.00E+00	0.00E+00
CR-51	4.66E+06	5.51E+06
MN-54	1.39E+09	1.63E+09
FE-59	2.73E+08	3.21E+08
CO-58	3.79E+08	4.44E+08
CO-60	2.15E+10	2.53E+10
ZN-65	7.47E+08	8.59E+08
SR-89	2.16E+04	2.51E+04
SR-90	0.00E+00	0.00E+00
ZR-95	2.45E+08	2.84E+08
SB-124	5.98E+08	6.90E+08
I-131	1.72E+07	2.09E+07
I-133	2.45E+06	2.98E+06
CS-134	6.86E+09	8.00E+09
CS-137	1.03E+10	1.20E+10
BA-140	2.05E+07	2.35E+07
CE-141	1.37E+07	1.54E+07
CE-144	6.95E+07	8.04E+07

TABLE 4-2

Ri DOSE CONVERSION FACTORS FOR THE VEGETATION

PATHWAY - ADULT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	2.87E+03	2.87E+03	2.87E+03	2.87E+03	2.87E+03	2.87E+03
CR-51	0.00E+00	0.00E+00	4.00E+04	2.39E+04	8.82E+03	5.31E+04	1.01E+07
MN-54	0.00E+00	2.97E+08	5.66E+07	0.00E+00	8.83E+07	0.00E+00	9.09E+08
FE-59	1.14E+08	2.68E+08	1.03E+08	0.00E+00	0.00E+00	7.49E+07	8.93E+08
CO-58	0.00E+00	2.84E+07	6.38E+07	0.00E+00	0.00E+00	0.00E+00	5.76E+08
CO-60	0.00E+00	1.59E+08	3.51E+08	0.00E+00	0.00E+00	0.00E+00	2.99E+09
ZN-65	3.00E+08	9.56E+08	4.32E+08	0.00E+00	6.39E+08	0.00E+00	6.02E+08
SR-89	9.08E+09	0.00E+00	2.61E+08	0.00E+00	0.00E+00	0.00E+00	1.46E+09
SR-90	5.76E+11	0.00E+00	1.41E+11	0.00E+00	0.00E+00	0.00E+00	1.67E+10
ZR-95	1.08E+06	3.47E+05	2.35E+05	0.00E+00	5.45E+05	0.00E+00	1.10E+09
SB-124	9.53E+07	1.80E+06	3.78E+07	2.31E+05	0.00E+00	7.42E+07	2.71E+09
I-131	5.49E+07	7.85E+07	4.50E+07	2.57E+10	1.35E+08	0.00E+00	2.07E+07
I-133	1.39E+06	2.42E+06	7.38E+05	3.56E+08	4.22E+06	0.00E+00	2.17E+06
CS-134	4.44E+09	1.06E+10	8.64E+09	0.00E+00	3.42E+09	1.13E+09	1.85E+08
CS-137	6.06E+09	8.29E+09	5.43E+09	0.00E+00	2.81E+09	9.36E+08	1.60E+08
BA-140	9.43E+07	1.19E+05	6.18E+06	0.00E+00	4.03E+04	6.78E+04	1.94E+08
CE-141	1.73E+05	1.17E+05	1.33E+04	0.00E+00	5.44E+04	0.00E+00	4.48E+08
CE-144	3.12E+07	1.30E+07	1.67E+06	0.00E+00	7.73E+06	0.00E+00	1.05E+10

TABLE 4-3

Ri DOSE CONVERSION FACTORS FOR THE VEGETATION PATHWAY - TEEN RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	3.36E+03	3.36E+03	3.36E+03	3.36E+03	3.36E+03	3.36E+03
CR-51	0.00E+00	0.00E+00	5.60E+04	3.11E+04	1.23E+04	7.99E+04	9.41E+06
MN-54	0.00E+00	4.41E+08	8.74E+07	0.00E+00	1.31E+08	0.00E+00	9.04E+08
FE-59	1.69E+08	3.94E+08	1.52E+08	0.00E+00	0.00E+00	1.24E+08	9.31E+08
CO-58	0.00E+00	4.16E+07	9.59E+07	0.00E+00	0.00E+00	0.00E+00	5.74E+08
CO-60	0.00E+00	2.42E+08	5.45E+08	0.00E+00	0.00E+00	0.00E+00	3.15E+09
ZN-65	4.11E+08	1.43E+09	6.65E+08	0.00E+00	9.12E+08	0.00E+00	6.04E+08
SR-89	1.43E+10	0.00E+00	4.10E+08	0.00E+00	0.00E+00	0.00E+00	1.70E+09
SR-90	7.30E+11	0.00E+00	1.80E+11	0.00E+00	0.00E+00	0.00E+00	2.05E+10
ZR-95	1.64E+06	5.17E+05	3.56E+05	0.00E+00	7.60E+05	0.00E+00	1.19E+09
SB-124	1.47E+08	2.70E+06	5.73E+07	3.33E+05	0.00E+00	1.28E+08	2.96E+09
I-131	5.29E+07	7.41E+07	3.98E+07	2.16E+10	1.28E+08	0.00E+00	1.47E+07
I-133	1.29E+06	2.19E+06	6.68E+05	3.06E+08	3.84E+06	0.00E+00	1.66E+06
CS-134	6.90E+09	1.62E+10	7.53E+09	0.00E+00	5.16E+09	1.97E+09	2.02E+08
CS-137	9.86E+09	1.31E+10	4.57E+09	0.00E+00	4.46E+09	1.73E+09	1.87E+08
BA-140	1.07E+08	1.31E+05	6.88E+06	0.00E+00	4.44E+04	8.80E+04	1.65E+08
CE-141	2.61E+05	1.74E+05	2.00E+04	0.00E+00	8.19E+04	0.00E+00	4.98E+08
CE-144	5.11E+07	2.12E+07	2.75E+06	0.00E+00	1.26E+07	0.00E+00	1.29E+10

TABLE 4-4

Ri DOSE CONVERSION FACTORS FOR THE VEGETATION

PATHWAY - CHILD RECEPTOR

NUCLIDES	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	5.23E+03	5.23E+03	5.23E+03	5.23E+03	5.23E+03	5.23E+03
CR-51	0.00E+00	0.00E+00	1.08E+05	6.02E+04	1.64E+04	1.10E+05	5.75E+06
MN-54	0.00E+00	6.49E+08	1.73E+08	0.00E+00	1.82E+08	0.00E+00	5.45E+08
FE-59	3.79E+08	6.13E+08	3.05E+08	0.00E+00	0.00E+00	1.78E+08	6.38E+08
CO-58	0.00E+00	6.21E+07	1.90E+08	0.00E+00	0.00E+00	0.00E+00	3.62E+08
CO-60	0.00E+00	3.70E+08	1.09E+09	0.00E+00	0.00E+00	0.00E+00	2.05E+09
ZN-65	7.93E+08	2.11E+09	1.31E+09	0.00E+00	1.33E+09	0.00E+00	3.71E+08
SR-89	3.44E+10	0.00E+00	9.83E+08	0.00E+00	0.00E+00	0.00E+00	1.33E+09
SR-90	1.22E+12	0.00E+00	3.09E+11	0.00E+00	0.00E+00	0.00E+00	1.64E+10
ZR-95	3.72E+06	8.17E+05	7.27E+05	0.00E+00	1.17E+06	0.00E+00	8.52E+08
SB-124	3.38E+08	4.39E+06	1.19E+08	7.47E+05	0.00E+00	1.88E+08	2.12E+09
I-131	9.95E+07	1.00E+08	5.68E+07	3.31E+10	1.64E+08	0.00E+00	8.90E+06
I-133	2.36E+06	2.91E+06	1.10E+06	5.41E+08	4.85E+06	0.00E+00	1.17E+06
CS-134	1.57E+10	2.57E+10	5.43E+09	0.00E+00	7.98E+09	2.86E+09	1.39E+08
CS-137	2.34E+10	2.24E+10	3.31E+09	0.00E+00	7.31E+09	2.63E+09	1.40E+08
BA-140	2.20E+08	1.93E+05	1.28E+07	0.00E+00	6.27E+04	1.15E+05	1.11E+08
CE-141	6.15E+05	3.07E+05	4.55E+04	0.00E+00	1.34E+05	0.00E+00	3.83E+08
CE-144	1.24E+08	3.89E+07	6.62E+06	0.00E+00	2.15E+07	0.00E+00	1.01E+10

TABLE 4-5

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MEAT PATHWAY - ADULT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	4.33E+02	4.33E+02	4.33E+02	4.33E+02	4.33E+02	4.33E+02
CR-51	0.00E+00	0.00E+00	3.44E+02	2.06E+02	7.58E+01	4.57E+02	8.65E+04
MN-54	0.00E+00	2.71E+06	5.18E+05	0.00E+00	8.08E+05	0.00E+00	8.31E+06
FE-59	2.60E+07	6.11E+07	2.34E+07	0.00E+00	0.00E+00	1.71E+07	2.04E+08
CO-58	0.00E+00	2.84E+06	6.36E+06	0.00E+00	0.00E+00	0.00E+00	5.75E+07
CO-60	0.00E+00	2.61E+07	5.76E+07	0.00E+00	0.00E+00	0.00E+00	4.90E+08
ZN-65	9.97E+07	3.17E+08	1.43E+08	0.00E+00	2.12E+08	0.00E+00	2.00E+08
SR-89	3.41E+07	0.00E+00	9.79E+05	0.00E+00	0.00E+00	0.00E+00	5.47E+06
SR-90	4.43E+09	0.00E+00	1.09E+09	0.00E+00	0.00E+00	0.00E+00	1.28E+08
ZR-95	2.68E+05	8.58E+04	5.81E+04	0.00E+00	1.35E+05	0.00E+00	2.72E+08
SB-124	2.67E+06	5.05E+04	1.06E+06	6.48E+03	0.00E+00	2.08E+06	7.59E+07
I-131	1.36E+05	1.94E+05	1.11E+05	6.37E+07	3.33E+05	0.00E+00	5.13E+04
I-133	4.56E-03	7.94E-03	2.42E-03	1.17E+00	1.39E-02	0.00E+00	7.14E-03
CS-134	2.17E+08	5.17E+08	4.23E+08	0.00E+00	1.67E+08	5.56E+07	9.05E+06
CS-137	3.11E+08	4.25E+08	2.78E+08	0.00E+00	1.44E+08	4.79E+07	8.22E+06
BA-140	4.35E+05	5.46E+02	2.85E+04	0.00E+00	1.86E+02	3.13E+02	8.95E+05
CE-141	8.87E+02	6.00E+02	6.80E+01	0.00E+00	2.79E+02	0.00E+00	2.29E+06
CE-144	4.23E+05	1.77E+05	2.27E+04	0.00E+00	1.05E+05	0.00E+00	1.43E+08

TABLE 4-6

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MEAT PATHWAY - TEEN RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	2.58E+02	2.58E+02	2.58E+02	2.58E+02	2.58E+02	2.58E+02
CR-51	0.00E+00	0.00E+00	2.75E+02	1.53E+02	6.03E+01	3.93E+02	4.62E+04
MN-54	0.00E+00	2.07E+06	4.11E+05	0.00E+00	6.18E+05	0.00E+00	4.25E+06
FE-59	2.08E+07	4.85E+07	1.87E+07	0.00E+00	0.00E+00	1.53E+07	1.15E+08
CO-58	0.00E+00	2.19E+06	5.04E+06	0.00E+00	0.00E+00	0.00E+00	3.02E+07
CO-60	0.00E+00	2.03E+07	4.56E+07	0.00E+00	0.00E+00	0.00E+00	2.64E+08
ZN-65	7.01E+07	2.43E+08	1.14E+08	0.00E+00	1.56E+08	0.00E+00	1.03E+08
SR-89	2.88E+07	0.00E+00	8.24E+05	0.00E+00	0.00E+00	0.00E+00	3.43E+06
SR-90	2.87E+09	0.00E+00	7.08E+08	0.00E+00	0.00E+00	0.00E+00	8.05E+07
ZR-95	2.14E+05	6.76E+04	4.65E+04	0.00E+00	9.93E+04	0.00E+00	1.56E+08
SB-124	2.18E+06	4.02E+04	8.52E+05	4.95E+03	0.00E+00	1.91E+06	4.40E+07
I-131	1.13E+05	1.58E+05	8.49E+04	4.61E+07	2.72E+05	0.00E+00	3.13E+04
I-133	3.82E-03	6.48E-03	1.98E-03	9.04E-01	1.14E-02	0.00E+00	4.90E-03
CS-134	1.73E+08	4.07E+08	1.89E+08	0.00E+00	1.29E+08	4.94E+07	5.06E+06
CS-137	2.58E+08	3.43E+08	1.20E+08	0.00E+00	1.17E+08	4.54E+07	4.88E+06
BA-140	3.59E+05	4.40E+02	2.31E+04	0.00E+00	1.49E+02	2.96E+02	5.54E+05
CE-141	7.45E+02	4.97E+02	5.71E+01	0.00E+00	2.34E+02	0.00E+00	1.42E+06
CE-144	3.56E+05	1.47E+05	1.91E+04	0.00E+00	8.80E+04	0.00E+00	8.96E+07

TABLE 4-7

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MEAT PATHWAY - CHILD RECEPTOR

NUCLIDES	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	3.12E+02	3.12E+02	3.12E+02	3.12E+02	3.12E+02	3.12E+02
CR-51	0.00E+00	0.00E+00	4.29E+02	2.38E+02	6.51E+01	4.35E+02	2.28E+04
MN-54	0.00E+00	2.37E+06	6.31E+05	0.00E+00	6.64E+05	0.00E+00	1.99E+06
FE-59	3.68E+07	5.96E+07	2.97E+07	0.00E+00	0.00E+00	1.73E+07	6.20E+07
CO-58	0.00E+00	2.55E+06	7.82E+06	0.00E+00	0.00E+00	0.00E+00	1.49E+07
CO-60	0.00E+00	2.40E+07	7.09E+07	0.00E+00	0.00E+00	0.00E+00	1.33E+08
ZN-65	1.05E+08	2.80E+08	1.74E+08	0.00E+00	1.77E+08	0.00E+00	4.92E+07
SR-89	5.45E+07	0.00E+00	1.56E+06	0.00E+00	0.00E+00	0.00E+00	2.11E+06
SR-90	3.70E+09	0.00E+00	9.39E+08	0.00E+00	0.00E+00	0.00E+00	4.99E+07
ZR-95	3.81E+05	8.36E+04	7.45E+04	0.00E+00	1.20E+05	0.00E+00	8.73E+07
SB-124	3.95E+06	5.12E+04	1.38E+06	8.72E+03	0.00E+00	2.19E+06	2.47E+07
I-131	2.09E+05	2.11E+05	1.20E+05	6.96E+07	3.46E+05	0.00E+00	1.87E+04
I-133	7.09E-03	8.77E-03	3.32E-03	1.63E+00	1.46E-02	0.00E+00	3.53E-03
CS-134	3.05E+08	5.00E+08	1.06E+08	0.00E+00	1.55E+08	5.56E+07	2.70E+06
CS-137	4.75E+08	4.55E+08	6.71E+07	0.00E+00	1.48E+08	5.33E+07	2.85E+06
BA-140	6.63E+05	5.81E+02	3.87E+04	0.00E+00	1.89E+02	3.46E+02	3.36E+05
CE-141	1.40E+03	6.99E+02	1.04E+02	0.00E+00	3.07E+02	0.00E+00	8.72E+05
CE-144	6.72E+05	2.11E+05	3.58E+04	0.00E+00	1.17E+05	0.00E+00	5.49E+07

TABLE 4-8

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MILK PATHWAY - ADULT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.02E+03	1.02E+03	1.02E+03	1.02E+03	1.02E+03	1.02E+03
CR-51	0.00E+00	0.00E+00	8.28E+03	4.95E+03	1.82E+03	1.10E+04	2.08E+06
MN-54	0.00E+00	3.99E+06	7.61E+05	0.00E+00	1.19E+06	0.00E+00	1.22E+07
FE-59	9.69E+06	2.28E+07	8.73E+06	0.00E+00	0.00E+00	6.36E+06	7.59E+07
CO-58	0.00E+00	1.74E+06	3.90E+06	0.00E+00	0.00E+00	0.00E+00	3.53E+07
CO-60	0.00E+00	8.41E+06	1.85E+07	0.00E+00	0.00E+00	0.00E+00	1.58E+08
ZN-65	6.34E+08	2.02E+09	9.12E+08	0.00E+00	1.35E+09	0.00E+00	1.27E+09
SR-89	4.90E+08	0.00E+00	1.41E+07	0.00E+00	0.00E+00	0.00E+00	7.86E+07
SR-90	2.43E+10	0.00E+00	5.96E+09	0.00E+00	0.00E+00	0.00E+00	7.02E+08
ZR-95	3.39E+02	1.09E+02	7.37E+01	0.00E+00	1.71E+02	0.00E+00	3.45E+05
SB-124	9.11E+06	1.72E+05	3.61E+06	2.21E+04	0.00E+00	7.09E+06	2.59E+08
I-131	7.77E+07	1.11E+08	6.37E+07	3.64E+10	1.91E+08	0.00E+00	2.93E+07
I-133	1.02E+06	1.77E+06	5.39E+05	2.60E+08	3.08E+06	0.00E+00	1.59E+06
CS-134	2.83E+09	6.73E+09	5.50E+09	0.00E+00	2.18E+09	7.23E+08	1.18E+08
CS-137	3.83E+09	5.24E+09	3.43E+09	0.00E+00	1.78E+09	5.91E+08	1.01E+08
BA-140	7.11E+06	8.93E+03	4.66E+05	0.00E+00	3.04E+03	5.11E+03	1.46E+07
CE-141	8.73E+03	5.90E+03	6.70E+02	0.00E+00	2.74E+03	0.00E+00	2.26E+07
CE-144	1.01E+06	4.21E+05	5.41E+04	0.00E+00	2.50E+05	0.00E+00	3.41E+08

TABLE 4-9

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MILK

PATHWAY - TEEN RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.33E+03	1.33E+03	1.33E+03	1.33E+03	1.33E+03	1.33E+03
CR-51	0.00E+00	0.00E+00	1.45E+04	8.03E+03	3.17E+03	2.06E+04	2.43E+06
MN-54	0.00E+00	6.64E+06	1.32E+06	0.00E+00	1.98E+06	0.00E+00	1.36E+07
FE-59	1.69E+07	3.95E+07	1.52E+07	0.00E+00	0.00E+00	1.24E+07	9.33E+07
CO-58	0.00E+00	2.93E+06	6.76E+06	0.00E+00	0.00E+00	0.00E+00	4.04E+07
CO-60	0.00E+00	1.42E+07	3.21E+07	0.00E+00	0.00E+00	0.00E+00	1.86E+08
ZN-65	9.74E+08	3.38E+09	1.58E+09	0.00E+00	2.17E+09	0.00E+00	1.43E+09
SR-89	9.03E+08	0.00E+00	2.59E+07	0.00E+00	0.00E+00	0.00E+00	1.08E+08
SR-90	3.43E+10	0.00E+00	8.48E+09	0.00E+00	0.00E+00	0.00E+00	9.64E+08
ZR-95	5.94E+02	1.87E+02	1.29E+02	0.00E+00	2.75E+02	0.00E+00	4.32E+05
SB-124	1.62E+07	2.99E+05	6.34E+06	3.69E+04	0.00E+00	1.42E+07	3.27E+08
I-131	1.41E+08	1.98E+08	1.06E+08	5.76E+10	3.40E+08	0.00E+00	3.91E+07
I-133	1.86E+06	3.15E+06	9.60E+05	4.39E+08	5.52E+06	0.00E+00	2.38E+06
CS-134	4.91E+09	1.16E+10	5.36E+09	0.00E+00	3.67E+09	1.40E+09	1.44E+08
CS-137	6.95E+09	9.24E+09	3.22E+09	0.00E+00	3.15E+09	1.22E+09	1.32E+08
BA-140	1.28E+07	1.57E+04	8.27E+05	0.00E+00	5.33E+03	1.06E+04	1.98E+07
CE-141	1.60E+04	1.07E+04	1.23E+03	0.00E+00	5.03E+03	0.00E+00	3.06E+07
CE-144	1.86E+06	7.68E+05	9.97E+04	0.00E+00	4.59E+05	0.00E+00	4.67E+08

TABLE 4-10

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MILK

PATHWAY - CHILD RECEPTOR

NUCLIDES	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	2.09E+03	2.09E+03	2.09E+03	2.09E+03	2.09E+03	2.09E+03
CR-51	0.00E+00	0.00E+00	2.95E+04	1.64E+04	4.47E+03	2.99E+04	1.56E+06
MN-54	0.00E+00	9.94E+06	2.65E+06	0.00E+00	2.79E+06	0.00E+00	8.34E+06
FE-59	3.92E+07	6.35E+07	3.16E+07	0.00E+00	0.00E+00	1.84E+07	6.61E+07
CO-58	0.00E+00	4.48E+06	1.37E+07	0.00E+00	0.00E+00	0.00E+00	2.61E+07
CO-60	0.00E+00	2.21E+07	6.52E+07	0.00E+00	0.00E+00	0.00E+00	1.23E+08
ZN-65	1.91E+09	5.09E+09	3.17E+09	0.00E+00	3.21E+09	0.00E+00	8.95E+08
SR-89	2.23E+09	0.00E+00	6.38E+07	0.00E+00	0.00E+00	0.00E+00	8.65E+07
SR-90	5.80E+10	0.00E+00	1.47E+10	0.00E+00	0.00E+00	0.00E+00	7.81E+08
ZR-95	1.38E+03	3.03E+02	2.70E+02	0.00E+00	4.34E+02	0.00E+00	3.16E+05
SB-124	3.84E+07	4.99E+05	1.35E+07	8.49E+04	0.00E+00	2.13E+07	2.41E+08
I-131	3.42E+08	3.44E+08	1.96E+08	1.14E+11	5.65E+08	0.00E+00	3.06E+07
I-133	4.51E+06	5.57E+06	2.11E+06	1.04E+09	9.29E+06	0.00E+00	2.25E+06
CS-134	1.13E+10	1.86E+10	3.92E+09	0.00E+00	5.76E+09	2.07E+09	1.00E+08
CS-137	1.67E+10	1.60E+10	2.36E+09	0.00E+00	5.22E+09	1.88E+09	1.00E+08
BA-140	3.10E+07	2.71E+04	1.81E+06	0.00E+00	8.83E+03	1.62E+04	1.57E+07
CE-141	3.94E+04	1.97E+04	2.92E+03	0.00E+00	8.62E+03	0.00E+00	2.45E+07
CE-144	4.57E+06	1.43E+06	2.44E+05	0.00E+00	7.94E+05	0.00E+00	3.74E+08

TABLE 4-11

Ri DOSE CONVERSION FACTORS FOR THE GRASS-COW-MILK

PATHWAY - INFANT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	3.18E+03	3.18E+03	3.18E+03	3.18E+03	3.18E+03	3.18E+03
CR-51	0.00E+00	0.00E+00	4.67E+04	3.05E+04	6.66E+03	5.93E+04	1.36E+06
MN-54	0.00E+00	1.85E+07	4.19E+06	0.00E+00	4.10E+06	0.00E+00	6.79E+06
FE-59	7.32E+07	1.28E+08	5.04E+07	0.00E+00	0.00E+00	3.78E+07	6.11E+07
CO-58	0.00E+00	8.96E+06	2.23E+07	0.00E+00	0.00E+00	0.00E+00	2.23E+07
CO-60	0.00E+00	4.52E+07	1.07E+08	0.00E+00	0.00E+00	0.00E+00	1.07E+08
ZN-65	2.57E+09	8.81E+09	4.06E+09	0.00E+00	4.27E+09	0.00E+00	7.44E+09
SR-89	4.25E+09	0.00E+00	1.22E+08	0.00E+00	0.00E+00	0.00E+00	8.74E+07
SR-90	6.31E+10	0.00E+00	1.61E+10	0.00E+00	0.00E+00	0.00E+00	7.88E+08
ZR-95	2.45E+03	5.97E+02	4.23E+02	0.00E+00	6.43E+02	0.00E+00	2.97E+05
SB-124	7.41E+07	1.09E+06	2.30E+07	1.97E+05	0.00E+00	4.64E+07	2.29E+08
I-131	7.14E+08	8.42E+08	3.70E+08	2.77E+11	9.83E+08	0.00E+00	3.00E+07
I-133	9.52E+06	1.39E+07	4.06E+06	2.52E+09	1.63E+07	0.00E+00	2.35E+06
CS-134	1.82E+10	3.40E+10	3.44E+09	0.00E+00	8.76E+09	3.59E+09	9.24E+07
CS-137	2.67E+10	3.13E+10	2.22E+09	0.00E+00	8.39E+09	3.40E+09	9.78E+07
BA-140	6.37E+07	6.37E+04	3.28E+06	0.00E+00	1.51E+04	3.91E+04	1.57E+07
CE-141	7.81E+04	4.77E+04	5.61E+03	0.00E+00	1.47E+04	0.00E+00	2.46E+07
CE-144	6.55E+06	2.68E+06	3.67E+05	0.00E+00	1.08E+06	0.00E+00	3.76E+08

TABLE 4-12

Ri DOSE CONVERSION FACTORS FOR THE INHALATION

PATHWAY - ADULT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.26E+03	1.26E+03	1.26E+03	1.26E+03	1.26E+03	1.26E+03
CR-51	0.00E+00	0.00E+00	1.00E+02	5.95E+01	2.28E+01	1.44E+04	3.32E+03
MN-54	0.00E+00	3.96E+04	6.30E+03	0.00E+00	9.84E+03	1.40E+06	7.74E+04
FE-59	1.18E+04	2.78E+04	1.06E+04	0.00E+00	0.00E+00	1.02E+06	1.88E+05
CO-58	0.00E+00	1.58E+03	2.07E+03	0.00E+00	0.00E+00	9.28E+05	1.06E+05
CO-60	0.00E+00	1.15E+04	1.48E+04	0.00E+00	0.00E+00	5.97E+06	2.85E+05
ZN-65	3.24E+04	1.03E+05	4.66E+04	0.00E+00	6.90E+04	8.64E+05	5.34E+04
SR-89	3.04E+05	0.00E+00	8.72E+03	0.00E+00	0.00E+00	1.40E+06	3.50E+05
SR-90	9.92E+07	0.00E+00	6.10E+06	0.00E+00	0.00E+00	9.60E+06	7.22E+05
ZR-95	1.07E+05	3.44E+04	2.33E+04	0.00E+00	5.42E+04	1.77E+06	1.50E+05
SB-124	3.12E+04	5.89E+02	1.24E+04	7.55E+01	0.00E+00	2.48E+06	4.06E+05
I-131	2.52E+04	3.58E+04	2.05E+04	1.19E+07	6.13E+04	0.00E+00	6.28E+03
I-133	8.64E+03	1.48E+04	4.52E+03	2.15E+06	2.58E+04	0.00E+00	8.88E+03
CS-134	3.73E+05	8.48E+05	7.28E+05	0.00E+00	2.87E+05	9.76E+04	1.04E+04
CS-137	4.78E+05	6.21E+05	4.28E+05	0.00E+00	2.22E+05	7.52E+04	8.40E+03
BA-140	3.90E+04	4.90E+01	2.57E+03	0.00E+00	1.67E+01	1.27E+06	2.18E+05
CE-141	1.99E+04	1.35E+04	1.53E+03	0.00E+00	6.26E+03	3.62E+05	1.20E+05
CE-144	3.43E+06	1.43E+06	1.84E+05	0.00E+00	8.48E+05	7.78E+06	8.16E+05

TABLE 4-13

Ri DOSE CONVERSION FACTORS FOR THE INHALATION

PATHWAY - TEEN RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.27E+03	1.27E+03	1.27E+03	1.27E+03	1.27E+03	1.27E+03
CR-51	0.00E+00	0.00E+00	1.35E+02	7.50E+01	3.07E+01	2.10E+04	3.00E+03
MN-54	0.00E+00	5.11E+04	8.40E+03	0.00E+00	1.27E+04	1.98E+06	6.68E+04
FE-59	1.59E+04	3.70E+04	1.43E+04	0.00E+00	0.00E+00	1.53E+06	1.78E+05
CO-58	0.00E+00	2.07E+03	2.78E+03	0.00E+00	0.00E+00	1.34E+06	9.52E+04
CO-60	0.00E+00	1.51E+04	1.98E+04	0.00E+00	0.00E+00	8.72E+06	2.59E+05
ZN-65	3.86E+04	1.34E+05	6.24E+04	0.00E+00	8.64E+04	1.24E+06	4.66E+04
SR-89	4.34E+05	0.00E+00	1.25E+04	0.00E+00	0.00E+00	2.42E+06	3.71E+05
SR-90	1.08E+08	0.00E+00	6.68E+06	0.00E+00	0.00E+00	1.65E+07	7.65E+05
ZR-95	1.46E+05	4.58E+04	3.15E+04	0.00E+00	6.74E+04	2.69E+06	1.49E+05
SB-124	4.30E+04	7.94E+02	1.68E+04	9.76E+01	0.00E+00	3.85E+06	3.98E+05
I-131	3.54E+04	4.91E+04	2.64E+04	1.46E+07	8.40E+04	0.00E+00	6.49E+03
I-133	1.22E+04	2.05E+04	6.22E+03	2.92E+06	3.59E+04	0.00E+00	1.03E+04
CS-134	5.02E+05	1.13E+06	5.49E+05	0.00E+00	3.75E+05	1.46E+05	9.76E+03
CS-137	6.70E+05	8.48E+05	3.11E+05	0.00E+00	3.04E+05	1.21E+05	8.48E+03
BA-140	5.47E+04	6.70E+01	3.52E+03	0.00E+00	2.28E+01	2.03E+06	2.29E+05
CE-141	2.84E+04	1.90E+04	2.17E+03	0.00E+00	8.88E+03	6.14E+05	1.26E+05
CE-144	4.89E+06	2.02E+06	2.62E+05	0.00E+00	1.21E+06	1.34E+07	8.64E+05

TABLE 4-14

Ri DOSE CONVERSION FACTORS FOR THE INHALATION

PATHWAY - CHILD RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	1.12E+03	1.12E+03	1.12E+03	1.12E+03	1.12E+03	1.12E+03
CR-51	0.00E+00	0.00E+00	1.54E+02	8.55E+01	2.43E+01	1.70E+04	1.08E+03
MN-54	0.00E+00	4.29E+04	9.51E+03	0.00E+00	1.00E+04	1.58E+06	2.29E+04
FE-59	2.07E+04	3.34E+04	1.67E+04	0.00E+00	0.00E+00	1.27E+06	7.07E+04
CO-58	0.00E+00	1.77E+03	3.16E+03	0.00E+00	0.00E+00	1.11E+06	3.44E+04
CO-60	0.00E+00	1.31E+04	2.26E+04	0.00E+00	0.00E+00	7.07E+06	9.62E+04
ZN-65	4.26E+04	1.13E+05	7.03E+04	0.00E+00	7.14E+04	9.95E+05	1.63E+04
SR-89	5.99E+05	0.00E+00	1.72E+04	0.00E+00	0.00E+00	2.16E+06	1.67E+05
SR-90	1.01E+08	0.00E+00	6.44E+06	0.00E+00	0.00E+00	1.48E+07	3.43E+05
ZR-95	1.90E+05	4.18E+04	3.70E+04	0.00E+00	5.96E+04	2.23E+06	6.11E+04
SB-124	5.74E+04	7.40E+02	2.00E+04	1.26E+02	0.00E+00	3.24E+06	1.64E+05
I-131	4.81E+04	4.81E+04	2.73E+04	1.62E+07	7.88E+04	0.00E+00	2.84E+03
I-133	1.66E+04	2.03E+04	7.70E+03	3.85E+06	3.38E+04	0.00E+00	5.48E+03
CS-134	6.51E+05	1.01E+06	2.25E+05	0.00E+00	3.30E+05	1.21E+05	3.85E+03
CS-137	9.07E+05	8.25E+05	1.28E+05	0.00E+00	2.82E+05	1.04E+05	3.62E+03
BA-140	7.40E+04	6.48E+01	4.33E+03	0.00E+00	2.11E+01	1.74E+06	1.02E+05
CE-141	3.92E+04	1.95E+04	2.90E+03	0.00E+00	8.55E+03	5.44E+05	5.66E+04
CE-144	6.77E+06	2.12E+06	3.61E+05	0.00E+00	1.17E+06	1.20E+07	3.89E+05

TABLE 4-15

Ri DOSE CONVERSION FACTORS FOR THE INHALATION

PATHWAY - INFANT RECEPTOR

NUCLIDE	BONE	LIVER	T.BODY	THYROID	KIDNEY	LUNG	GI-LLI
H-3	0.00E+00	6.47E+02	6.47E+02	6.47E+02	6.47E+02	6.47E+02	6.47E+02
CR-51	0.00E+00	0.00E+00	8.95E+01	5.75E+01	1.32E+01	1.28E+04	3.57E+02
MN-54	0.00E+00	2.53E+04	4.98E+03	0.00E+00	4.98E+03	1.00E+06	7.06E+03
FE-59	1.36E+04	2.35E+04	9.48E+03	0.00E+00	0.00E+00	1.02E+06	2.48E+04
CO-58	0.00E+00	1.22E+03	1.82E+03	0.00E+00	0.00E+00	7.77E+05	1.11E+04
CO-60	0.00E+00	8.02E+03	1.18E+04	0.00E+00	0.00E+00	4.51E+06	3.19E+04
ZN-65	1.93E+04	6.26E+04	3.11E+04	0.00E+00	3.25E+04	6.47E+05	5.14E+04
SR-89	3.98E+05	0.00E+00	1.14E+04	0.00E+00	0.00E+00	2.03E+06	6.40E+04
SR-90	4.09E+07	0.00E+00	2.59E+06	0.00E+00	0.00E+00	1.12E+07	1.31E+05
ZR-95	1.15E+05	2.79E+04	2.03E+04	0.00E+00	3.11E+04	1.75E+06	2.17E+04
SB-124	3.79E+04	5.56E+02	1.20E+04	1.01E+02	0.00E+00	2.65E+06	5.91E+04
I-131	3.79E+04	4.44E+04	1.96E+04	1.48E+07	5.18E+04	0.00E+00	1.06E+03
I-133	1.32E+04	1.92E+04	5.60E+03	3.56E+06	2.24E+04	0.00E+00	2.16E+03
CS-134	3.96E+05	7.03E+05	7.45E+04	0.00E+00	1.90E+05	7.97E+04	1.33E+03
CS-137	5.49E+05	6.12E+05	4.55E+04	0.00E+00	1.72E+05	7.13E+04	1.33E+03
BA-140	5.60E+04	5.60E+01	2.90E+03	0.00E+00	1.34E+01	1.60E+06	3.84E+04
CE-141	2.77E+04	1.67E+04	1.99E+03	0.00E+00	5.25E+03	5.17E+05	2.16E+04
CE-144	3.19E+06	1.21E+06	1.76E+05	0.00E+00	5.38E+05	9.84E+06	1.48E+05

TABLE 4-16

PALO VERDE NUCLEAR GENERATING STATION DISPERSION

AND DEPOSITION PARAMETERS FOR LONG TERM RELEASES

AT THE NEAREST PATHWAY LOCATIONS CENTERED ON UNIT 1

DIRECTION	X/Q (Sec/m^3)	RESIDENCE(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	GARDEN(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	MILK(b) Dist. Miles	D/Q (m^{-2})
N	2.92E-06	1.4	3.25E-09	2.92E-06	1.4	3.25E-09	7.03E-07	(a)	3.48E-10
NNE	1.81E-06	1.8	2.88E-09	4.70E-07	(a)	4.04E-10	4.70E-07	(a)	4.04E-10
NE	1.95E-06	1.9	3.85E-09	1.76E-06	2.1	3.29E-09	5.77E-07	(a)	6.51E-10
ENE	1.03E-06	2.7	1.08E-09	1.03E-06	2.7	1.08E-09	3.86E-07	(a)	2.86E-10
E	9.39E-07	2.8	6.68E-10	3.71E-07	(a)	1.87E-10	3.71E-07	(a)	1.87E-10
ESE	6.37E-07	3.7	2.84E-10	4.12E-07	4.6	1.60E-10	4.12E-07	4.6	1.60E-10 goat
SE	8.83E-07	4.1	2.61E-10	8.83E-07	4.1	2.61E-10	5.84E-07	(a)	1.52E-10
SSE	1.27E-06	4.7	2.61E-10	1.09E-06	(a)	2.15E-10	1.09E-06	(a)	2.15E-10
S	2.58E-06	4.6	4.85E-10	2.09E-06	5.2	3.59E-10	2.13E-06	5.1	3.71E-10 cow
SSW	3.26E-06	3.5	8.26E-10	2.28E-06	(a)	4.53E-10	2.28E-06	(a)	4.53E-10
SW	2.80E-06	2.9	9.10E-10	1.58E-06	(a)	3.56E-10	1.58E-06	(a)	3.56E-10
WSW	1.95E-06	2.6	1.09E-09	8.55E-07	(a)	3.18E-10	8.55E-07	(a)	3.18E-10
W	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10
WNW	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10
NW	8.24E-07	3.8	5.25E-10	7.55E-07	4.1	4.61E-10	6.02E-07	(a)	3.27E-10
NNW	1.46E-06	2.0	1.47E-09	5.20E-07	(a)	3.04E-10	5.20E-07	(a)	3.04E-10

(a) 5-mile value used since there is no pathway located within the sector up to five miles.

(b) Controlling locations are discussed in Appendix A.

References: 1984 Land Use Census (letter ANPM-21221-JRM/LEB). NUS Corporation letters NUS-ANPP-1385 and NUS-ANPP-1386.

TABLE 4-17

PALO VERDE NUCLEAR GENERATING STATION DISPERSION

AND DEPOSITION PARAMETERS FOR LONG TERM RELEASES

AT THE NEAREST PATHWAY LOCATIONS CENTERED ON UNIT 2

DIRECTION	X/Q (Sec/m^3)	RESIDENCE(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	GARDEN(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	MILK(b) Dist. Miles	D/Q (m^{-2})
N	2.73E-06	1.5	2.92E-09	2.39E-06	1.7	2.35E-09	7.03E-07	(a)	3.48E-10
NNE	2.20E-06	1.5	3.87E-09	2.20E-06	1.5	3.87E-09	4.70E-07	(a)	4.04E-10
NE	1.85E-06	2.0	3.55E-09	1.57E-06	2.3	2.78E-09	5.77E-07	(a)	6.51E-10
ENE	1.03E-06	2.7	1.08E-09	1.03E-06	2.7	1.08E-09	3.86E-07	(a)	2.86E-10
E	8.80E-07	3.0	6.06E-10	3.71E-07	(a)	1.87E-10	3.71E-07	(a)	1.87E-10
ESE	6.25E-07	3.7	2.76E-10	3.96E-07	4.7	1.51E-10	3.96E-07	4.7	1.51E-10 goat
SE	9.06E-07	4.0	2.72E-10	9.06E-07	4.0	2.72E-10	5.84E-07	(a)	1.52E-10
SSE	1.34E-06	4.5	2.81E-10	1.09E-06	(a)	2.15E-10	1.09E-06	(a)	2.15E-10
S	2.63E-06	4.5	5.01E-10	2.19E-06	5.0	3.88E-10	2.19E-06	5.0	3.88E-10 cow
SSW	3.48E-06	3.2	9.19E-10	2.28E-06	(a)	4.53E-10	2.28E-06	(a)	4.53E-10
SW	2.93E-06	2.7	9.75E-10	1.58E-06	(a)	3.56E-10	1.58E-06	(a)	3.56E-10
WSW	2.01E-06	2.5	1.16E-09	8.55E-07	(a)	3.18E-10	8.55E-07	(a)	3.18E-10
W	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10
WNW	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10
NW	7.84E-07	4.0	4.88E-10	7.84E-07	4.0	4.88E-10	6.02E-07	(a)	3.27E-10
NNW	1.46E-06	2.0	1.47E-09	5.20E-07	5.0	3.04E-10	5.20E-07	(a)	3.04E-10

(a) 5-mile value used since there is no pathway located within the sector up to five miles.

(b) Controlling locations are discussed in Appendix A.

References: 1984 Land Use Census (letter ANPM-21221-JRM/LEB). NUS Corporation letters NUS-ANPP-1385 and NUS-ANPP-1386.

TABLE 4-18

PALO VERDE NUCLEAR GENERATING STATION DISPERSION AND DEPOSITION PARAMETERS FOR LONG TERM RELEASES AT THE NEAREST PATHWAY LOCATIONS CENTERED ON UNIT 3

DIRECTION	X/Q (Sec/m^3)	RESIDENCE(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	GARDEN(b) Dist. Miles	D/Q (m^{-2})	X/Q (Sec/m^3)	MILK(b) Dist. Miles	D/Q (m^{-2})
N	2.58E-06	1.8	2.47E-09	2.42E-06	1.9	2.22E-09	7.03E-07	(a)	3.48E-10
NNE	1.85E-06	1.7	2.97E-09	1.85E-06	1.7	2.97E-09	4.70E-07	(a)	4.04E-10
NE	1.66E-06	2.2	3.00E-09	1.48E-06	2.4	2.54E-09	5.77E-07	(a)	6.51E-10
ENE	8.75E-07	2.9	8.86E-10	8.75E-07	2.9	8.86E-10	3.86E-07	(a)	2.86E-10
E	8.90E-07	3.0	6.17E-10	4.06E-07	4.6	2.15E-10	4.25E-07	4.5	2.31E-10 goat
ESE	6.37E-07	3.7	2.84E-10	5.80E-07	4.0	2.46E-10	3.73E-07	(a)	1.37E-10
SE	5.84E-07	(a)	1.52E-10	5.84E-07	(a)	1.52E-10	5.84E-07	(a)	1.52E-10
SSE	1.36E-06	4.4	2.88E-10	1.09E-06	(a)	2.15E-10	1.09E-06	(a)	2.15E-10
S	2.65E-06	4.2	5.25E-10	2.25E-06	4.9	4.06E-10	2.31E-06	4.8	4.21E-10 cow
SSW	3.64E-06	3.1	9.82E-10	2.28E-06	(a)	4.53E-10	2.28E-06	(a)	4.53E-10
SW	3.19E-06	2.5	1.11E-09	1.58E-06	(a)	3.56E-10	1.58E-06	(a)	3.56E-10
WSW	2.12E-06	2.4	1.26E-09	8.55E-07	(a)	3.18E-10	8.55E-07	(a)	3.18E-10
W	7.54E-07	(a)	4.44E-10	7.54E-07	(a)	4.44E-10	7.54E-10	(a)	4.44E-10
WNW	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10	6.03E-07	(a)	3.25E-10
NW	6.83E-07	4.3	4.05E-10	6.82E-07	4.3	4.05E-10	6.02E-07	(a)	3.27E-10
NNW	1.34E-06	2.2	1.26E-09	5.16E-07	5.0	3.01E-10	5.20E-07	(a)	3.04E-10

(a) 5-mile value used since there is no pathway located within the sector up to five miles.

(b) Controlling locations are discussed in Appendix A.

References: 1984 Land Use Census (letter ANPM-21221-JRM/LEB). NUS Corporation letters NUS-ANPP-1385 and NUS-ANPP-1386.

4.4 Requirements: Liquid Effluents

The dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each reactor unit, to areas at and beyond the SITE BOUNDARY (See Figure 6-4 and Figure 6-5) shall be limited:

a. During any calendar quarter to less than or equal to 1.5 mrems to the total body and to less than or equal to 5 mrems to any organ, and

b. During any calendar year to less than or equal to 3 mrems to the total body and to less than or equal to 10 mrems to any organ.

Applicability: At all times.

Action:

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, 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.

4.4.1 Surveillance Requirements

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.

4.4.2 Implementation of the Requirements

This Requirement does not require implementation guidance. There are no offsite liquid effluent releases.

5.0 TOTAL DOSE AND DOSE TO PUBLIC ONSITE

5.1 Requirement: Total Dose

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

Applicability: At all times.

Action:

With the calculated doses from the release of radioactive materials in liquid and gaseous effluents exceeding twice the limits of Section 4.4a, 4.4b, 4.1a, 4.1b, 4.2a or 4.2b calculations shall be made including direct radiation contributions from the reactor units (including outside storage tanks, etc.) to determine whether the above limits of Section 5.1 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 10 CFR 20.2203(a)(4), 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 concentrations 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 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report within 30 days is considered a timely request, and a variance is granted until staff action on the request is complete.

5.1.1 Surveillance Requirements

a. Cumulative dose contributions from the gaseous effluents shall be determined in accordance with the surveillance requirements of Section 4.4.1, 4.1.1 and 4.2.1 and in accordance with the methodology and parameters contained in Section 5.1.2.

b. Cumulative dose contributions from direct radiation from the reactor units and from radwaste storage tanks shall be determined in accordance with the methodology and parameters in Section 5.1.2. This requirement is applicable only under conditions set forth in Section 5.1, Action.

5.1.2 Implementation of the Requirement

Since all other uranium fuel cycle sources are greater than 20 miles away, only the PVNGS site need be considered.

The total dose to any MEMBER OF THE PUBLIC will be determined based on a sum of the doses from all three units' releases and doses from direct radiation from PVNGS.

This dose evaluation is performed annually and submitted with the Annual Radioactive Effluent Release Report to assure compliance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation. NUREG-0543, Methods for Demonstrating LWR Compliance With the EPA Uranium Fuel Cycle Standard (40 CFR Part 190), February 1980, provides a discussion on compliance with 40 CFR Part 190 in relation to the Radiological Environmental Technical Specifications for sites of up to four nuclear power reactors. The NUREG concludes that as long as a nuclear plant site operates at a level below the 10 CFR Part 50, Appendix I reporting requirements, and there is no significant source of direct radiation from the site, no extra analysis is required to demonstrate compliance with 40 CFR Part 190. As a result, this dose evaluation will also be performed whenever calculated doses associated with effluent releases exceed twice the limits of Section 4.4a, 4.4b, 4.1a, 4.1b, 4.2a or 4.2b.

Dose Contribution from Liquid and Gaseous Effluents

The annual whole body dose accumulated by a MEMBER OF THE PUBLIC for the noble gases released in gaseous effluents is determined by using the following equation:

$$D_{WB} = (3.17E\text{-}08)\ \Sigma_i\ [(K_i)\ (X/Q)_{UNIT}\ (Q_i)] \qquad (5\text{-}1)$$

Where:

K_i = the whole body dose factor due to gamma emissions for each identified noble gas radionuclide i, in mrem/yr per $\mu Ci/m^3$ from Table 3-3.

Q_i = the integrated release of radionuclide i, in μCi for the previous calendar year.

$(X/Q)_{UNIT}$ = the highest calculated annual average dispersion parameter, in sec/m^3, for a particular unit, at the controlling location, from Table 4-16, 4-17, or 4-18, or concurrent meteorological data if available.

=2.92E-06 from Unit 1
=2.19E-06 from Unit 2
=2.31E-06 from Unit 3

D_{WB} = the annual whole body dose in mrem to a MEMBER OF THE PUBLIC at the controlling location due to noble gases released in gaseous effluents.

3.17E-08 = the inverse of seconds in a year (yr/sec).

The annual dose to any organ accumulated by a MEMBER OF THE PUBLIC for iodine-131, iodine-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days released in gaseous effluents is determined by using the following equation:

$$D_o = (3.17E\text{-}08)\ \Sigma_i\ [\Sigma_k(R_{ik}W_k)\ (Q_i)] \qquad (5\text{-}2)$$

Where:

D_o = the total annual organ dose from gaseous effluents to a MEMBER OF THE PUBLIC, in mrem, at the controlling location.

Q_i = the integrated release of radionuclide i, in µCi, for the previous calendar year.

R_{ik} = the dose factor for each identified radionuclide i, for pathway k (for the inhalation pathway in mrem/yr per µCi/m^3 and for the food and ground plane pathways in m^2-mrem/yr per µCi/sec) at the controlling location. The R_{ik}'s for each age group are given in Tables 4-1 through 4-15.

W_K = the highest annual average dispersion or deposition parameter for the particular unit, used for estimating the total annual organ dose to a MEMBER OF THE PUBLIC at the controlling location for the particular unit.

= $(X/Q)_{UNIT}$, in sec/m^3 for the inhalation pathway and for all tritium calculations, for organ dose at the controlling location, from Table 4-16, 4-17, or 4-18, or concurrent meteorological data if available.

=2.92E-06 from Unit 1
=2.19E-06 from Unit 2
=2.31E-06 from Unit 3

= $(D/Q)_{UNIT}$, in m^{-2}, for the food and ground plane pathways, for organ dose at the controlling location, from Table 4-16, 4-17, or 4-18, or concurrent meteorological data if available.

=3.25E-09 from Unit 1
=3.88E-10 from Unit 2
=4.21E-10 from Unit 3

3.17E-08 = the inverse of seconds in a year (yr/sec).

Dose Due to Direct Radiation

The component of dose to a MEMBER OF THE PUBLIC due to direct radiation will be evaluated by first determining the direct radiation dose at the site boundary in each sector, and then extrapolating the site boundary dose to the controlling location by the inverse square law of distance.

Dose from Radioactive Liquid and Gaseous Effluents to MEMBERS OF THE PUBLIC due to their activities within the SITE BOUNDARY.

These activities have been determined to be limited to the vicinity of the Energy Information Center (EIC) located inside the SITE BOUNDARY. An assumption was made that no MEMBER OF THE PUBLIC would spend more than eight hours per year at this location. However this calculation has been historically performed assuming an occupancy factor of one (implying continuous occupancy over the entire year).

A X/Q, determined for the Energy Information Center, will be used for this assessment.

Equations 5-1 and 5-2 in Section 5.1.2 should be used for this assessment.

6.0 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (REMP)

6.1 Requirement: REMP

The radiological environmental monitoring program shall be conducted as specified in Table 6-1, based on locations determined using data from the pre-operational monitoring period; and/or the operational monitoring period indicating a need to make changes in the program.

Applicability: At all times.

Action:

a. With the radiological environmental monitoring program not being conducted as specified in Table 6-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report, as required by Section 7.2, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.

b. 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 6-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, 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 4.4, 4.1 and 4.2. When more than one of the radionuclides in Table 6-2 are detected in the sampling medium, this report shall be submitted if:

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

When radionuclides other than those in Table 6-2 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 is equal to or greater than the calendar year limits of Section 4.4, 4.1 and 4.2. 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.

c. With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 6-1, identify locations for obtaining replacement samples and add them to the Radiological Environmental Monitoring Program within 30 days. The specific locations from which samples were unavailable may then be deleted from the monitoring program.

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

6.1.1 Surveillance Requirements

a. The radiological environmental monitoring samples shall be collected pursuant to Table 6-1 from the specific locations given in Table 6-4 and Figure 6-1 and Figure 6-2 and shall be analyzed pursuant to the requirements of Table 6-1, and the detection capabilities required by Table 6-3.

6.1.2 Implementation of the Requirements

The results of the radiological environmental monitoring program are intended to supplement the results of the radiological effluent monitoring program by verifying that the measurable concentrations of radioactive materials and levels of radiation are not higher than expected based on the effluent measurements and modeling of the environmental exposure pathways. Thus the specified environmental monitoring program provides measurements of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures to individuals resulting from station operation.

This requirement is implemented by Nuclear Administrative and Technical Manual procedures.

TABLE 6-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations[a]	Sampling and Collection Frequency[a]	Type and Frequency of Analysis[d]
<u>Airborne</u> Radioiodine and particulates	Samples from 5 locations: 4 samples at or near the SITE BOUNDARIES (#14A, 15, 29, 40) including 3 different sectors of the highest calculated annual average ground level D/Q.* 1 sample (#40) from areas of special interest, which is from the vicinity of a community having the highest calculated annual average D/Q. 1 sample (#6A) from a control location 15-30 km (9-18 mi) distant and in the least prevalent wind direction.[e]	Continuous sampling collected weekly, or more frequently if required by dust loading.	Gross beta weekly[c], I-131 weekly; gamma isotopic analysis of composite (by location) quarterly.
Direct radiation[b]	Forty (40) routine monitoring stations (#5-40, #42, #44, #46, #50) either with two or more dosimeters or with one instrument for measuring and recording dose rate continuously, placed as follows: An inner ring of stations, one in each meteorological sector in the general area of the site boundary (16 locations); An outer ring of stations, one in each meteorological sector in the 6-8 km (4-5 mi) range from the site (16 locations); and The balance of the stations (8 locations) to be placed in special interest areas such as population centers, nearby residences, schools, and in one or two areas to serve as control stations.	Quarterly	Gamma dose quarterly.

* D/Q refers to average annual relative ground deposition rate.

TABLE 6-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations[a]	Sampling and Collection Frequency[a]	Type and Frequency of Analysis[d]
Waterborne			
Surface	Water storage reservoir (#60) Evaporation pond #1 (#59) Evaporation pond #2 (#63)	Monthly composite of weekly grab sample.	Gamma isotopic analysis monthly; tritium quarterly.
Ground	2 onsite wells[f] (#57, #58)	Quarterly grab sample	Tritium and gamma isotopic analysis quarterly.
Drinking (well)	3 wells from surrounding residences (#46, #48, #49) that would be affected by its discharge.	Composite sample of weekly grab samples over 2-week period when I-131 analysis is performed, monthly composite of weekly grab samples otherwise	I-131 analysis on each composite when the dose calculated for the consumption of the water is greater than 1 mrem per year.[g] Composite for gross beta and gamma isotopic analyses monthly. Composite for tritium analysis quarterly.
Ingestion Milk	Samples from milking animals in 3 locations within 5 km distant having the highest dose potential. If there are none, 1 sample from milking animals in each of three areas between 5 and 8 km (3-5 mi) distant (#51, #54) where doses are calculated to be greater than 1 mrem per year.[g] One sample from milking animals at a control location 15 to 30 km (9-18 mi) distant (#53) and in the least prevalent wind direction.[e]	Semimonthly for animals on pasture; otherwise, monthly.	Gamma isotopic and I-131 analysis semimonthly when animals are on pasture or monthly at other times.

TABLE 6-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

Exposure Pathway and/or Sample	Number of Representative Samples and Sample Locations[a]	Sampling and Collection Frequency[a]	Type and Frequency of Analysis[d]
Food Products *	2 samples (#47, #52) of 3 types of broad leaf vegetation (as available) from locations identified per the criteria of Section 6.2b. of this manual.	Monthly during growing season.	Gamma isotopic analysis.
	1 control sample (#62) of 3 types of broad leaf vegetation (as available) grown 15 to 30 km (9-18 mi) distant in the least prevalent wind direction.[e]	Monthly during growing season.	Gamma isotopic analysis.
* When broad leaf vegetation samples are not available, reports from 4 existing supplemental airborne radioiodine sample locations will be substituted.			

TABLE 6-1 (Continued)

TABLE NOTATION

a The number, media, frequency, and location of sampling may vary from site to site. It is recognized that, at times, it may not be possible or practical to obtain samples of the media of choice at the most desired location or time. In these instances suitable alternative media and locations may be chosen for the particular pathway in question. Actual locations (distance and direction) from the site shall be provided in Table 6-4 and Figure 6-1 or Figure 6-2 in the ODCM. Refer to Regulatory Guide 4.1, "Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants."

b Regulatory Guide 4.13 provides guidance for thermoluminescence dosimetry (TLD) systems used for environmental monitoring. 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. For the purposes of this table, a thermoluminescent dosimeter may be considered to be one phosphor, and two or more phosphors in a packet may be considered as two or more dosimeters. Film badges should not be used for measuring direct radiation.

c Particulate sample filters shall be analyzed for gross beta 24 hours or more after sampling to allow for radon and thoron daughter decay. If gross beta activity in air or water is greater than 10 times the yearly mean of control samples for any medium, gamma isotopic analysis should be performed on the individual samples.

d Gamma isotopic analysis means the identification and quantification of gamma-emitting radionuclides that may be attributable to the effluents from the facility.

e The purpose of this sample is to obtain background information. If it is not practical to establish control locations in accordance with the wind direction and distance criteria, other sites that provide valid background data may be substituted.

f Groundwater samples should 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.

g The dose shall be calculated for the maximum organ and age group, using the methodology and parameters in the ODCM.

TABLE 6-2

REPORTING LEVELS FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES

Analysis	Water (pCi/l)	Airborne Particulate or Gas (pCi/m^3)	Fresh Milk (pCi/l)	Food Products (pCi/kg, wet)
H-3	20,000 *			
Mn-54	1,000			
Fe-59	400			
Co-58	1,000			
Co-60	300			
Zn-65	300			
Zr-Nb-95	400			
I-131	2 **	0.9	3	100
Cs-134	30	10	60	1,000
Cs-137	50	20	70	2,000
Ba-La-140	200		300	

* For drinking water samples. This is a 40 CFR 141 value. If no drinking water pathway exists, a value of 30,000 pCi/l may be used.

** If no drinking water pathway exists, a reporting level of 20 pCi/l may be used.

TABLE 6-3

DETECTION CAPABILITIES FOR ENVIRONMENTAL ANALYSIS [a]

Lower Limit of Detection (LLD)[b]				
Analysis	Water (pCi/l)	Airborne Particulate or Gas (pCi/m^3)	Fresh Milk (pCi/l)	Food Products (pCi/kg, wet)
Gross Beta	4	0.01		
H-3	2000*			
Mn-54	15			
Fe-59	30			
Co-58, -60	15			
Zn-65	30			
Zr-95	30			
Nb-95	15			
I-131	1**	0.07	1	60
Cs-134	15	0.05	15	60
Cs-137	18	0.06	18	80
Ba-140	60		60	
La-140	15		15	

NOTE: This list does not mean that only these nuclides are to be detected and reported. Other peaks that are measurable and identifiable, together with the above nuclides, shall also be identified and reported.

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

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

Table 6-3 (Continued)

TABLE NOTATION

a Guidance for detection capabilities for thermoluminescent dosimeters used for environmental measurements is given in Regulatory Guide 4.13.

b Table 6-3 indicates acceptable detection capabilities for radioactive materials in environmental samples. These detection capabilities are tabulated in terms of the lower limits of detection (LLDs). The LLD is defined, for purposes of this guide, 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):

$$LLD = \frac{4.66 s_b}{E * V * 2.22 * Y * \exp(-\lambda \Delta t)}$$

Where:

LLD is the a priori lower limit of detection as defined above (as pCi per unit mass or volume),

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

E is the counting efficiency (as counts per disintegration),

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

2.22 is the number of disintegrations per minute per picocurie,

Y is the fractional radiochemical yield (when applicable),

λ is the radioactive decay constant for the particular radionuclide, and

Δt for environmental samples is the elapsed time between sample collection (or end of the sample collection period) and time of counting.

In calculating the LLD for a radionuclide determined by gamma-ray spectrometry the background should include the typical contributions of other radionuclides normally present in the samples (e.g., potassium-40 in milk samples). Typical values of E, V, Y, and Δt should be used in the calculation.

It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (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.

6.2 Requirement: Land Use Census

A land use census shall be conducted and shall identify within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, the nearest residence and the nearest garden* of greater than 50 m^2 (500 ft^2) producing broad leaf vegetation.

Applicability: At all times.

Action:

a. With a land use census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Section 4.2.1, identify the new location(s) in the next Annual Radioactive Effluent Release Report, pursuant to Section 7.1.

b. 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 6.1, add the new location(s) to the radiological environmental monitoring program within 30 days. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may then be deleted from the monitoring program.

6.2.1 Surveillance Requirements

a. The land use census shall be conducted during the growing season annually 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 pursuant to Section 7.2.

6.2.2 Implementation of the Requirements

The above Requirement is implemented by Nuclear Administrative and Technical Manual procedures.

* Broad Leaf vegetation sampling of at least three different kinds of vegetation may be performed at the SITE BOUNDARY in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Specifications for broad leaf vegetation sampling in Table 6-1 shall be followed, including analysis of control samples.

6.3 Requirement: Interlaboratory Comparison Program

Analyses shall be performed on radioactive materials supplied as part of an Interlaboratory Comparison Program that correspond to samples required by Table 6-1, as applicable.

Applicability: At all times.

Action:

a. 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 pursuant to Section 7.2.

6.3.1 Surveillance Requirements

a. A summary of the results obtained as part of the above required Interlaboratory Comparison Program and in accordance with the methodology and parameters in this manual shall be included in the Annual Radiological Environmental Operating Report pursuant to Section 7.2.

6.3.2 Implementation of the Requirements

PVNGS laboratories or contract laboratories which perform analyses for the Radiological Environmental Monitoring Program (REMP) participate in an Interlaboratory Comparison Program. The participation includes all of the determinations (sample medium-radionuclide combinations) that are included in the monitoring program.

If deviation from specified limits is identified an investigation is made to determine the reason for the deviation and corrective actions are taken as necessary. The results of all analyses made under this program are included in the Annual Radiological Environmental Operating Report.

TABLE 6-4

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE COLLECTION LOCATIONS

SAMPLE SITE	SAMPLE TYPE	NOTE (d)	LOCATION DESIGNATION (a)	LOCATION DESCRIPTION (c)
1	TLD	SUP	E30	Goodyear
2	TLD	SUP	ENE24	Scott-Libby School
3	TLD	SUP	E21	Liberty School
4	TLD	SUP	E16	Buckeye
4	Air	SUP	E16	Same as TLD
5	TLD (b)	SP	ESE11	Palo Verde School
6	TLD (b)	Control	SSE31	APS Gila Bend substation
6A	Air (b)	Control	SSE13	Old US 80
7	TLD (b)	SP	SE7	Old US 80 and Arlington School Rd.
7A	Air	SUP	ESE3	Arlington School
8	TLD (b)	OR	SSE4	Southern Pacific Pipeline Rd.
9	TLD (b)	OR	S5	Southern Pacific Pipeline Rd.
10	TLD (b)	OR	SE5	355th Ave. and Elliot Rd.
11	TLD (b)	OR	ESE5	339th Ave. and Dobbins Rd.
12	TLD (b)	OR	E5	339th Ave. and Buckeye-Salome Rd.
13	TLD (b)	IR	N1	N site boundary
14	TLD (b)	IR	NNE2	NNE site boundary
14A	Air (b)		NNE2	371st Ave. and Buckeye-Salome Rd.
15	TLD (b)	IR	NE2	NE site boundary, WRF access road
15	Air (b)		NE2	Same as TLD
16	TLD (b)	IR	ENE2	ENE site boundary
17	TLD (b)	IR	E2	E site boundary
17A	Air	SUP	E3	351st Ave.
18	TLD (b)	IR	ESE2	ESE site boundary
19	TLD (b)	IR	SE2	SE site boundary
20	TLD (b)	IR	SSE2	SSE site boundary

TABLE 6-4

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE COLLECTION LOCATIONS

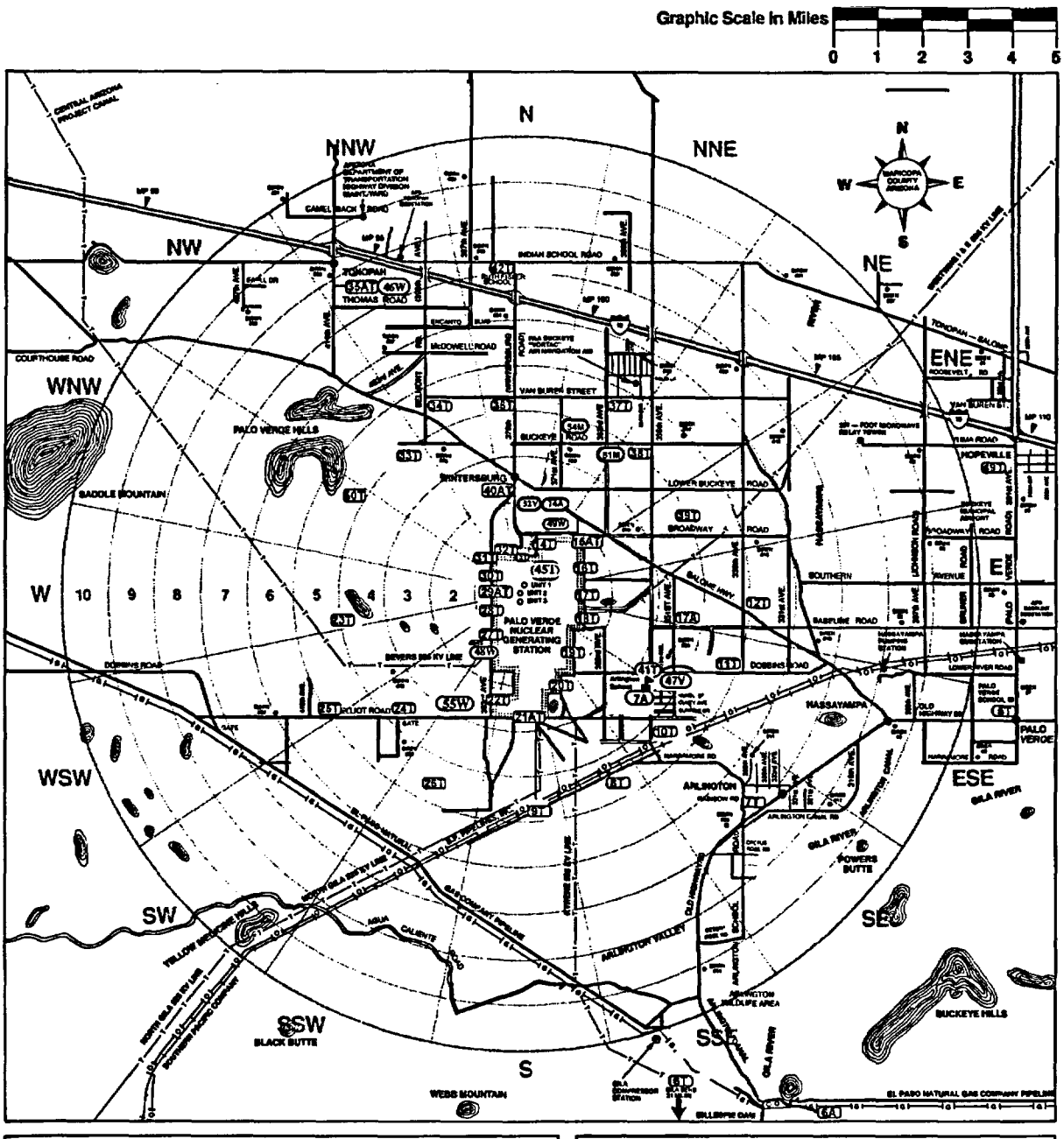
SAMPLE SITE	SAMPLE TYPE	NOTE (d)	LOCATION DESIGNATION (a)	LOCATION DESCRIPTION (c)
21	TLD (b)	IR	S3	S site boundary
21	Air	SUP	S3	Same as TLD
22	TLD (b)	IR	SSW3	SSW site boundary
23	TLD (b)	OR	W5	N of Elliot Rd
24	TLD (b)	OR	SW4	N of Elliot Rd.
25	TLD (b)	OR	WSW5	N of Elliot Rd.
26	TLD (b)	OR	SSW4	Duke Property
27	TLD (b)	IR	SW1	SW site boundary
28	TLD (b)	IR	WSW1	WSW site boundary
29	TLD (b)	IR	W1	W site boundary
29	Air (b)		W1	Same as TLD
30	TLD (b)	IR	WNW1	WNW site boundary
31	TLD (b)	IR	NW1	NW site boundary
32	TLD (b)	IR	NNW1	NNW site boundary
33	TLD (b)	OR	NW4	S of Buckeye Rd.
34	TLD (b)	OR	NNW5	395th Ave. and Van Buren St.
35	TLD (b)	SP	NNW8	Tonopah
35	Air	SUP	NNW8	Same as TLD
36	TLD (b)	OR	N5	Wintersburg Rd. and Van Buren St.
37	TLD (b)	OR	NNE5	363rd Ave. and Van Buren St.
38	TLD (b)	OR	NE5	355th Ave. and Buckeye Rd.
39	TLD (b)	OR	ENE5	343rd Ave. N of Broadway Rd.
40	TLD (b)	SP	N2	Wintersburg
40	Air (b)		N2	Same as TLD
41	TLD	SUP	ESE3	Arlington School
42	TLD (b)	SP	N8	Ruth Fisher School
44	TLD (b)	Control	ENE35	El Mirage

TABLE 6-4

RADIOLOGICAL ENVIRONMENTAL MONITORING SAMPLE COLLECTION LOCATIONS

SAMPLE SITE	SAMPLE TYPE	NOTE (d)	LOCATION DESIGNATION (a)	LOCATION DESCRIPTION (c)
45	TLD	SUP Transit Control	ONSITE	Central lab, lead pig
46	TLD (b)	SP	ENE30	Litchfield Park School
46	Water (b)	WD	NNW8	Local residence
47	TLD	SUP	E35	Littleton School
47	Vegetation (b)		ESE4	Local residence
48	TLD	SUP	E24	Jackrabbit Trail
48	Water (b)	WD	SW1	Local residence
49	TLD	SUP	ENE11	Palo Verde Rd.
49	Water (b)	WD	N2	Local residence
50	TLD (b)	OR	WNW5	S of Buckeye-Salome Rd.
51	Milk (b)		NE4	Local residence (goats)
52	Vegetation (b)		NNE2	Local residence
53	Milk (b)	Control	NE36	Local residence (goats)
54	Milk (b)		NNE4	Local residence (goats)
55	Water	WD SUP	SW3	Local residence
57	Ground Water (b)	WG	onsite	Well 27ddc
58	Ground Water (b)	WG	onsite	Well 34abb
59	Surface Water (b)	WS	onsite	Evaporation Pond #1
60	Surface Water (b)	WS	onsite	Reservoir
62	Vegetation (b)	Control	ENE26	Commercial produce company
63	Surface Water (b)	WS	onsite	Evaporation Pond #2

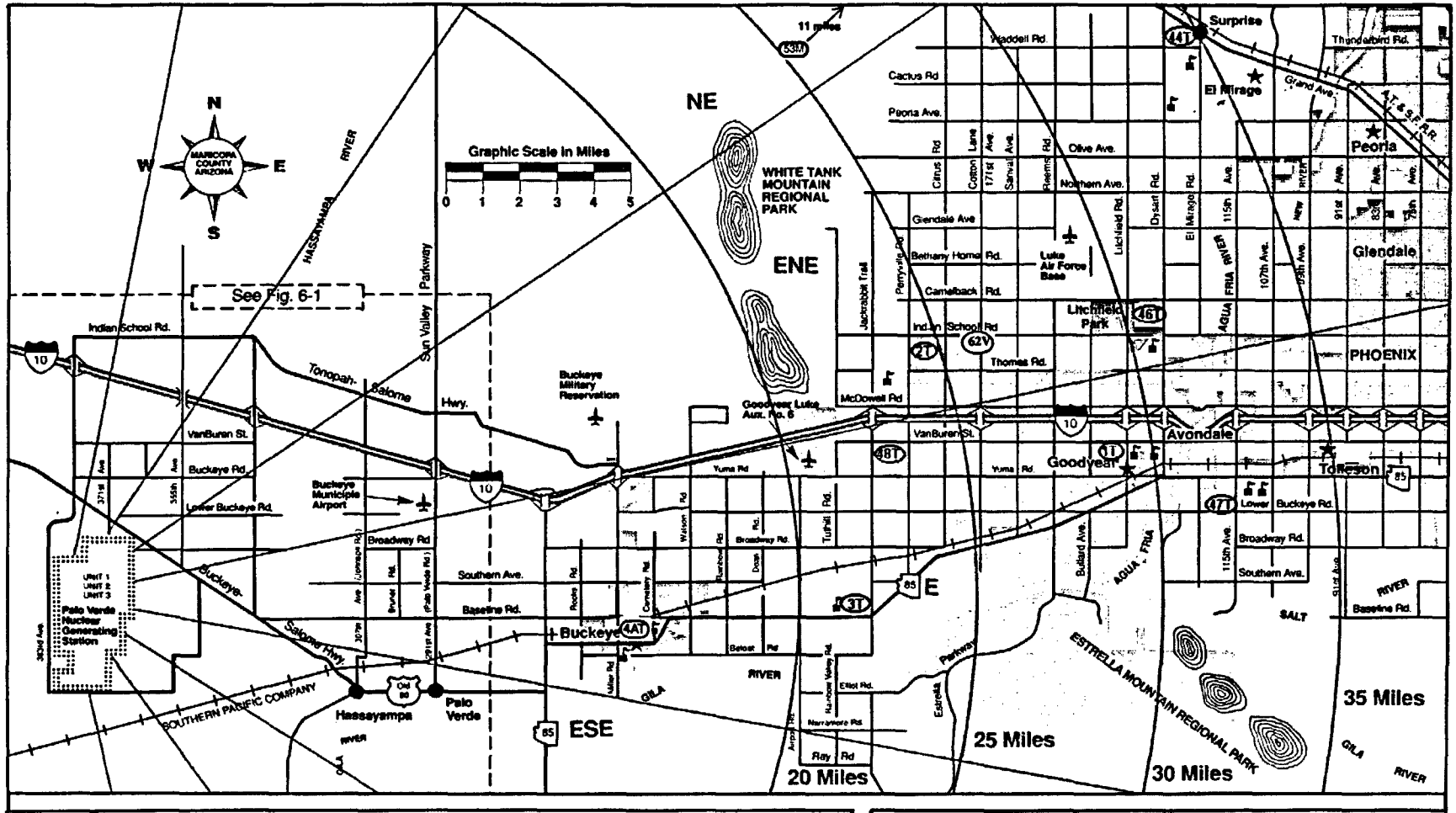
NOTES: (a) Distance and direction are relative to the Unit 2 containment, rounded to the nearest mile.
(b) These samples fulfill the requirements of the ODCM, Table 6-1.
(c) Refer to Figure 6-1 and Figure 6-2 for relative locations of sample sites.
(d) IR - inner ring
OR - outer ring
SP - school or population center
WS - waterborne surface
WG - waterborne ground
WD - waterborne drinking
SUP -designated supplemental sampling location



Palo Verde Nuclear Generating Station

Figure 6-1

RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM SAMPLE SITES 0-10 MILES



KEY TO MAP

- Railroad
- Airstrip/Airport
- Schools Located Near Sample Sites
- Municipal Buildings
- Palo Verde Nuclear Generating Station Boundary
- T Thermoluminescent Dosimeters (TLD)
- A Air Sample
- (1) Sample Sites
- V Vegetation
- M Milk

Palo Verde Nuclear Generating Station
Figure 6-2
RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM SAMPLE SITES 0-35 MILES

Figure 6-3
DELETED

Palo Verde Nuclear Generating Station

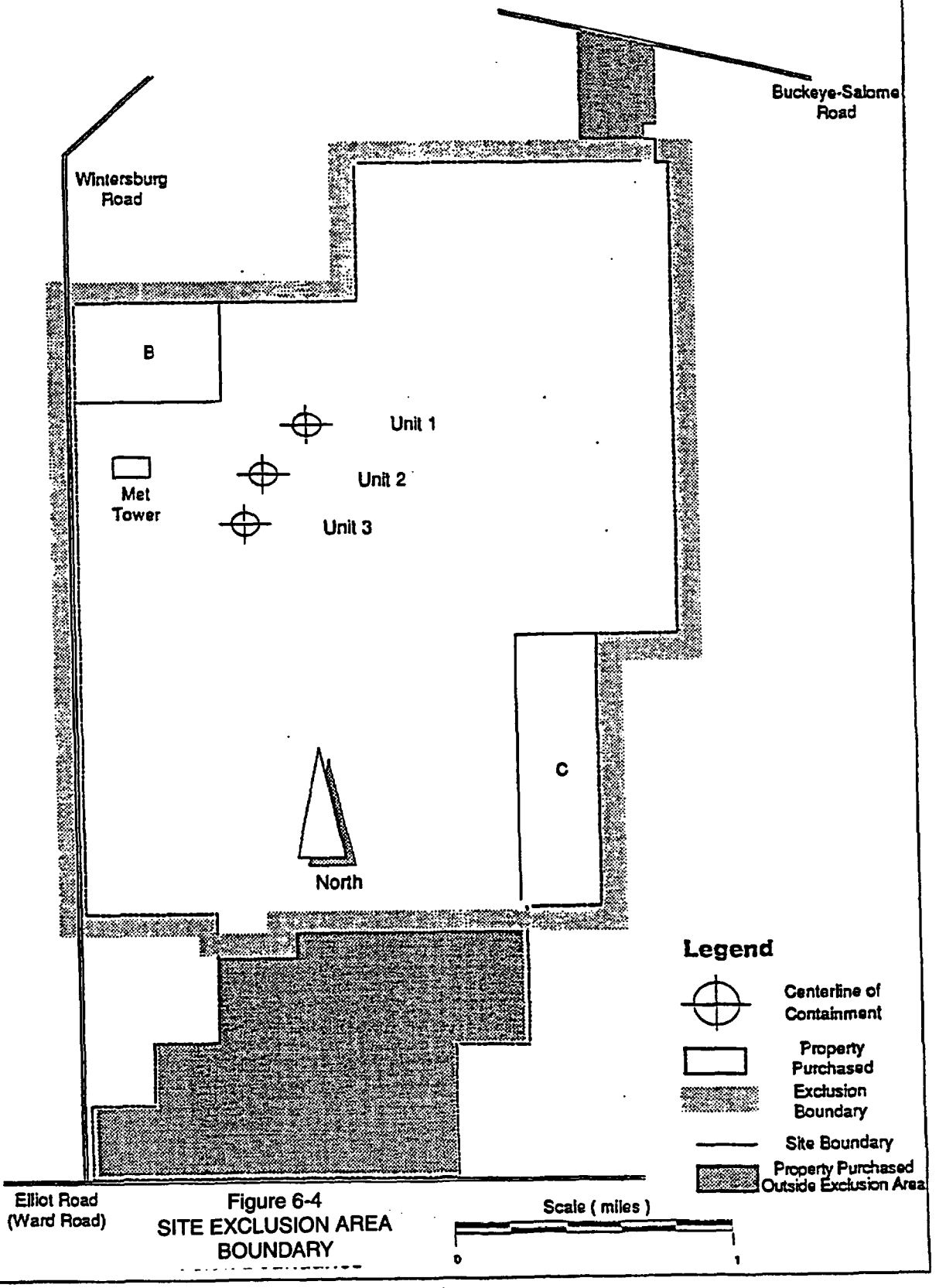
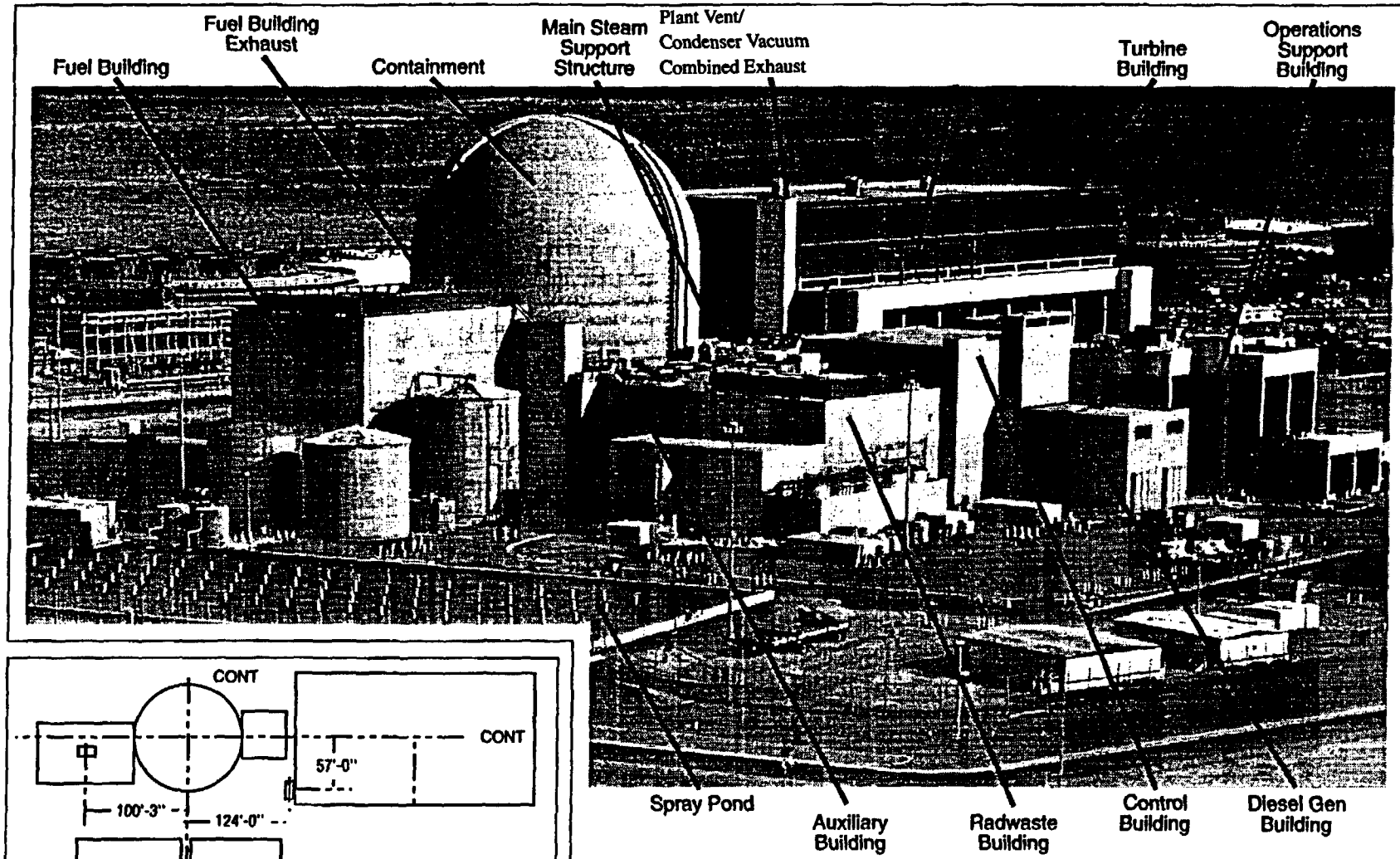
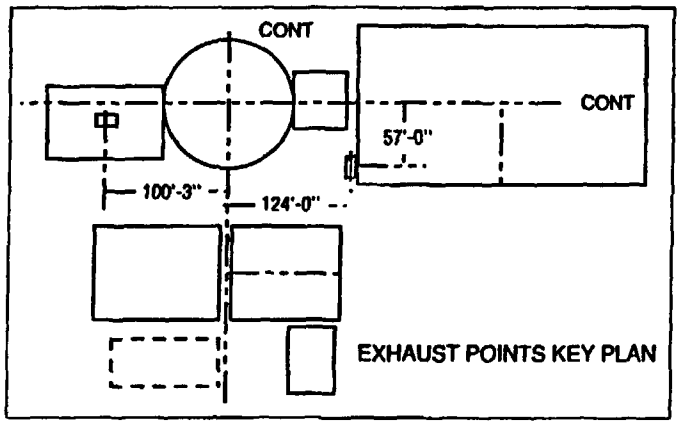


Figure 6-4
SITE EXCLUSION AREA BOUNDARY





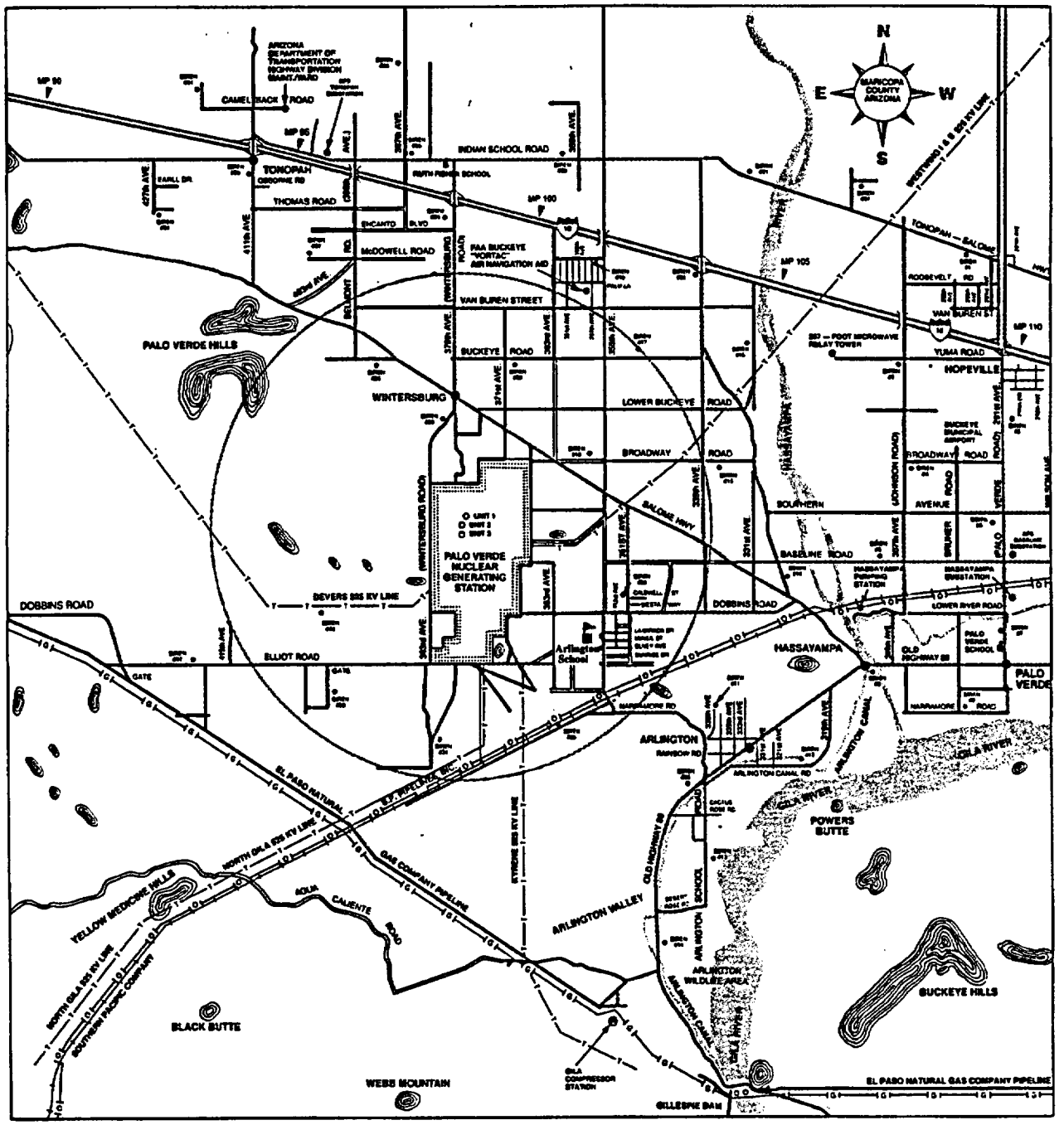
Elevation of Exhaust Point Above Grade	
Plant Vent/Condenser Vacuum	145'
Fuel Building	109'-9"

Palo Verde Nuclear Generating Station
Figure 6-5
GASEOUS EFFLUENTS RELEASE POINTS

Palo Verde Nuclear Generating Station

Graphic Scale in Miles

0 1 2 3 4 5



KEY TO MAP

- Paved Road
- Unpaved Road
- 4WD Road
- Gas Pipeline
- Oil Pipeline
- Power Line
- Railroad
- Airstrip
- Palo Verde Nuclear Generating Station Boundary
- School
- Siren
- MP Milepost

Palo Verde Nuclear Generating Station
Figure 6-6

LOW POPULATION ZONE
0-5 MILES

7.0 RADIOLOGICAL REPORTS

7.1 Requirement: Annual Radioactive Effluent Release Report *

Routine Annual Radioactive Effluent Release Reports covering the operation of the units during the previous calendar year shall be submitted in accordance with Technical Specification 5.6.3.

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.

The Annual Radioactive Effluent Release Report shall include an annual summary of hourly meteorological data collected over the previous 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**. This same report shall 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 same report shall also include an assessment of the radiation doses from radioactive liquid and gaseous effluents to MEMBERS OF THE PUBLIC due to their activities inside the SITE BOUNDARY (Figure 6-4) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The meteorological conditions concurrent with the time of release of radioactive materials in gaseous effluents, as determined by sampling frequency and measurement, shall be used for determining the gaseous pathway doses. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the ODCM.

The Annual Radioactive Effluent Release Report shall also include an assessment of radiation doses to the likely most exposed MEMBER OF THE PUBLIC from reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contributions are given Section 5.0 and Regulatory Guide 1.109 Rev. 1, October 1977.

The Annual Radioactive Effluent Release Report shall also include information required by the Technical Requirements Manual, Section 5.0.600.1.

* 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.

** In lieu of submission with the Annual Radioactive Effluent Release 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 Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

a. Container volume,

b. Total curie quantity (specify whether determined by measurement or estimate),

c. Principal radionuclides (specify whether determined by measurement or estimate),

d. Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),

e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and

f. 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 UNRESTRICTED AREAS of radioactive materials in gaseous and liquid effluents made during the reporting period.

Changes to the ODCM shall be submitted in the form of a complete, legible copy as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Changes made to the Process Control Program shall be submitted with the Annual Radioactive Effluent Release Report for the period of the report in which any change in the Process Control Program was made.

7.2 Requirement: Annual Radiological Environmental Operating Report *

Routine Annual Radiological Environmental Operating Reports covering the operation of the units during the previous calendar year shall be submitted by May 15 of each year in accordance with Technical Specification 5.6.2.

The Annual Radiological Environmental Operating Reports 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 reports shall also include the results of land use censuses required by Section 6.2.

The Annual Radiological Environmental Operating Reports shall include the results of analysis of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in Table 6-4 and Figure 6-1 and Figure 6-2 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; at least two legible maps** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Section 6.3; discussion of all deviations from the sampling schedule of Table 6-1; and discussion of all analyses in which the LLD required by Table 6-3 was not achievable.

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

** One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.

APPENDIX A
DETERMINATION OF CONTROLLING LOCATION

The controlling location is the location of the MEMBER OF THE PUBLIC who receives the highest doses.

The determination of a controlling location for implementation of 10CFR50 for radioiodines and particulates is known to be a function of:

(1) Isotopic release rates

(2) Meteorology

(3) Exposure pathway

(4) Receptor's age

The incorporation of these parameters into Equation 5-2 results in the respective equations at the controlling location. The isotopic release rates are based upon the source terms calculated using the PVNGS Environmental Report, Operating License Stage, Table 3.5-12, without carbon.

All of the locations and exposure pathways, identified in the 1984 Land Use Census, have been evaluated. These include cow milk ingestion, goat milk ingestion, vegetable ingestion, inhalation, and ground plane exposure. An infant is assumed to be present at all milk pathway locations. A child is assumed to be present at all vegetable garden locations. The ground plane exposure pathway is only considered to be present where an infant is not present. Naturally, inhalation is present everywhere an individual is present.

For the determination of the controlling locations, the highest X/Q and D/Q values, based on the 9 year meteorological data base, for the vegetable garden, cow milk, and goat milk pathways, are selected for each unit. The receptor organ doses have been calculated at each of these locations. Based upon these calculations, it is determined that the controlling receptor pathway is a function of unit location. For Unit 1, the controlling receptor is a garden-child pathway; for releases from Unit 2 and Unit 3 the controlling receptor is a cow milk-infant pathway. These determinations are based upon Table 4-16, 4-17, or 4-18, which, in turn, is based upon the 1984 Land Use Census. Locations of the nearest residences, gardens and milk animals, as determined in the 1984 Land Use Census, are given in Table 4-16, 4-17, and 4-18.

APPENDIX B
BASES FOR REQUIREMENTS

B-2.1 RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

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 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63, 64 of Appendix A to 10 CFR PART 50.

There are two separate radioactive gaseous effluent monitoring systems: the low range effluent monitors for normal plant radioactive gaseous effluents and the high range effluent monitors for post-accident plant radioactive gaseous effluents. The low range monitors operate at all times until the concentration of radioactivity in the effluent becomes too high during post-accident conditions. The high range monitors only operate when the concentration of radioactivity in the effluent is above the setpoint in the low range monitors.

B-3.1 GASEOUS EFFLUENT - DOSE RATE

This requirement provides reasonable assurance that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC in an UNRESTRICTED AREA, either at or beyond the SITE BOUNDARY, in excess of the design objectives of Appendix I to 10 CFR part 50. This requirement is provided to ensure that gaseous effluents from all units on the site will be appropriately controlled. It provides operational flexibility for releasing gaseous effluents to satisfy the Section II.A and II.C design objectives of Appendix I to 10 CFR part 50. 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 total 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 to a child via the inhalation pathway to less than or equal to 1500 mrems/year. This requirement does not affect the requirement to comply with the annual limitations of 10 CFR 20.1301(a).

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

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of the lower limits of detection (LLD). Detailed discussion of the LLD and other detection limits can be found in Currie, L. A., "Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements," NUREG/CR-4007 (September 1984), and in the HASL Procedures Manual, HASL-300 (revised annually).

B-3.2 SECONDARY SYSTEM LIQUID WASTE DISCHARGE TO ONSITE EVAPORATION PONDS - CONCENTRATION

This requirement is provided to ensure that the annual total effective dose equivalent to individual members of the public from the licensed operation does not exceed the requirements of 10 CFR Part 20, due to the accumulated activity in the evaporation ponds from the secondary system discharges.

Restricting the concentrations of the secondary liquid wastes discharged to the onsite evaporation ponds will restrict the quantity of radioactive material that can accumulate in the ponds. This, in turn, provides assurance that in the event of an uncontrolled release of the pond's contents to an UNRESTRICTED AREA, the resulting total effective dose equivalent to individual members of the public at the nearest exclusion area boundary will not exceed the requirements of 10 CFR Part 20.

This requirement applies to the secondary system liquid waste discharges of radioactive materials from all reactor units to the onsite evaporation ponds.

The required detection capabilities for radioactive materials in gaseous waste samples are tabulated in terms of the lower limits of detection (LLD). Detailed discussion of the LLD and other detection limits can be found in Currie, L. A., "Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements," NUREG/CR-4007 (September 1984), and in the HASL Procedures Manual, HASL-300 (revised annually).

B-4.1 GASEOUS EFFLUENT - DOSE, Noble Gases

This requirement is provided to implement Sections II.B, III.A and IV.A of Appendix I, 10 CFR Part 50. This requirement implements 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 UNRESTRICTED AREAS will be kept "as low as is reasonably 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. The dose calculation methodology and parameters established in the ODCM for calculating the doses due to the actual release rates of radioactive noble gases 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 10 CFR Part 50, 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 requirement applies to the release of radioactive materials in gaseous effluents from each reactor unit at the site.

B-4.2 GASEOUS EFFLUENT - DOSE - Iodine-131, Iodine-133, Tritium, and All Radionuclides in Particulate Form With Half-Lives Greater Than 8 Days

This requirement is provided to implement the requirements of Sections II.C, III.A, IV.A of Appendix I, 10 CFR Part 50. This requirement is the guide 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 materials in gaseous effluents to UNRESTRICTED AREAS will be kept "as low as is reasonably 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. 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 10 CFR Part 50, Appendix I," Revision 1, October 1977 and Regulatory Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases for 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, iodine-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 animals graze with consumption of the milk and meat by man, and (4) deposition on the ground with subsequent exposure of man.

This requirement applies to the release of radioactive materials in gaseous effluents from each reactor unit at the site.

B-4.3 GASEOUS RADWASTE TREATMENT

The OPERABILITY of the GASEOUS RADWASTE SYSTEM and the VENTILATION EXHAUST TREATMENT SYSTEM ensures that the systems will be available for use whenever gaseous effluents require treatment prior to release to the environment. The requirement that the appropriate portions of these systems be used, when specified, provides reasonable assurance that the releases of radioactive materials in gaseous effluents will be kept "as low as reasonably achievable." This requirement implements the requirements of 10 CFR 50.36a, General Design Criterion 60 of Appendix A to 10 CFR Part 50, and the design objectives given in Section II.D of Appendix I to 10 CFR Part 50. The specified limits governing the use of appropriate portions of the systems were specified as a suitable fraction of the dose design objectives set forth in Sections II.B and II.C of Appendix I, 10 CFR Part 50, for gaseous effluents.

This requirement applies to the release of radioactive materials in gaseous effluents from each reactor unit at the site.

The minimum analysis frequency of 4/M (i.e., at least 4 times per month at intervals no greater than 9 days and a minimum of 48 times a year) is used for certain radioactive gaseous waste sampling in Table 3-1. This will eliminate taking double samples when quarterly and weekly samples are required at the same time.

B-4.4 SECONDARY SYSTEM LIQUID WASTE DISCHARGE TO ONSITE EVAPORATION PONDS - DOSE

This requirement is provided to implement the requirements of Sections II.A, III.A and IV.A of Appendix I, 10 CFR Part 50. This requirement implements 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." Also, for fresh water sites with drinking water supplies that can be potentially affected by plant operations, there is reasonable assurance that the operation of the facility will not result in radionuclide concentrations in the finished drinking water that are in excess of the requirements of 40 CFR Part 141. 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 10 CFR Part 50, 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.

This requirement applies to the release of liquid effluents from each reactor at the site. For units with shared radwaste treatment systems, the liquid effluents from the shared system are proportioned among the units sharing that system.

B-5.1 TOTAL DOSE AND DOSE TO PUBLIC ONSITE

This requirement is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR 20.1301(d). The requirement specifies 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. Even if a site was to contain up to four reactors, it is highly unlikely that the resultant dose to a MEMBER OF THE PUBLIC will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the reactor units (including outside storage tanks, etc.) 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 40 CFR Part 190 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 40 CFR Part 190, submittal of the Special Report within 30 days with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR Part 190.11 and 10 CFR Part 20.2203(a)(4), is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to other requirements for dose limitation of 10 CFR Part 20, as addressed in Section 3.2 and 3.1 of the ODCM. 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. Demonstration of compliance with the limits of 40 CFR Part 190 or with the design objectives of Appendix I to 10 CFR Part 50 will be considered to demonstrate compliance with the 0.1 rem limit of 10 CFR 20.1301.

B-6.1 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM (REMP)

The Radiological Environmental Monitoring Program required by this requirement 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 10 CFR Part 50 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 (LLD). The LLDs required by Table 6-3 are considered optimum for routine environmental measurements in industrial laboratories. It should be recognized that the LLD is defined as an a priori (before the fact) limit representing the capability of a measurement system and not as an a posteriori (after the fact) limit for a particular measurement.

Detailed discussion of the LLD and other detection limits can be found in Currie, L. A., "Lower Limit of Detection: Definition and Elaboration of a Proposed Position for Radiological Effluent and Environmental Measurements," NUREG/CR-4007 (September 1984), and in the HASL Procedures Manual, HASL-300 (revised annually).

B-6.2 LAND USE CENSUS

This requirement 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 are made if required by the results of this census. The best information from the door-to-door survey, from aerial survey or from consulting with local agricultural authorities shall be used. This census satisfies the requirements of Section IV.B.3 of Appendix I to 10 CFR Part 50. Restricting the census to gardens of greater than 50 m^2 provides assurance that significant exposure pathways via leafy vegetables will be identified and monitored since a garden of this size is the minimum required to produce the quantity (26 kg/year) of leafy vegetables assumed in Regulatory Guide 1.109 for consumption by a child. To determine this minimum garden size, the following assumptions were made: (1) 20% of the garden was used for growing broad leaf vegetation (i.e., similar to lettuce and cabbage), and (2) a vegetation yield of 2 kg/m^2.

B-6.3 INTERLABORATORY COMPARISON PROGRAM

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 sample 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 10 CFR Part 50.

APPENDIX C

DEFINITIONS

Note:

The following definitions were derived from the Palo Verde Nuclear Generating Station Technical Specifications. These selected definitions support those portions of the Technical Specifications which were transferred to the ODCM and have been incorporated into the Requirements sections of the ODCM.

Definitions:

The defined terms of this section appear in capitalized type and are applicable throughout the Requirements sections of this ODCM.

ACTION

ACTION shall be that part of a requirement which prescribes remedial measures required under designated conditions.

CHANNEL CALIBRATION

See the Technical Specification definition.

CHANNEL CHECK

See the Technical Specification definition.

CHANNEL FUNCTIONAL TEST

See the Technical Specification definition.

DOSE EQUIVALENT I-131

See the Technical Specification definition.

FREQUENCY NOTATION

The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table C-1.

GASEOUS RADWASTE SYSTEM

A GASEOUS RADWASTE SYSTEM shall be any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system offgases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

MEMBER(S) OF THE PUBLIC

MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the licensee, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

DEFINITIONS (Continued)

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).

MODE

See the Technical Specification definition.

PROCESS CONTROL PROGRAM

The PROCESS CONTROL PROGRAM shall contain the current formulas, sampling, analyses, test, 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, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

PURGE-PURGING

PURGE or PURGING shall be the 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.

RATED THERMAL POWER

See the Technical Specification definition.

SITE BOUNDARY

The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

SOLIDIFICATION

SOLIDIFICATION shall be the conversion of radioactive wastes from liquid systems to a homogeneous (uniformly distributed), monolithic, immobilized solid with definite volume and shape, bounded by a stable surface of distinct outline on all sides (free-standing).

SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of channel response when the channel sensor is exposed to a source of increased radioactivity.

THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

APPENDIX C

DEFINITIONS (Continued)

UNRESTRICTED AREA

An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by the licensee for the purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

VENTILATION EXHAUST TREATMENT SYSTEM

A 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 Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

VENTING

VENTING shall be the 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.

TABLE C-1

FREQUENCY NOTATION

NOTATION	FREQUENCY
S	At least once per 12 hours.
D	At least once per 24 hours.
W	At least once per 7 days.
4/M	At least 4 times per month at intervals no greater than 9 days and a minimum of 48 times per year.
M	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 184 days.
ANNUALLY	At least once per 365 days
R	At least once per 18 months.
P	Completed prior to each release.
S/U	Prior to reactor startup.
N.A.	Not Applicable.

APPENDIX D
REFERENCES

1 Title 10, Code of Federal Regulations, Part 20, "Standards for Protection Against Radiation."

2 Title 10, Code of Federal Regulations, Part 50, "Domestic Licensing of Production and Utilization Facilities."

3 Title 40, Code of Federal Regulations, Part 190, Environmental Radiation Protection Standards for Nuclear Power Operations."

4 Federal Register, Vol. 58, No. 245, Thursday, December 23, 1993, Notices, pages 68170-68179.

5 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.

6 Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10 CFR Part 50, Appendix I," Revision 1, October 1977.

7 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.

8 Regulatory Guide 4.1, "Programs for Monitoring Radioactivity in the Environs of Nuclear Power Plants," Revision 1, April 1975.

9 NUREG-0133, Preparation of Radiological Effluent Technical Specifications For Nuclear Power Plants, Oct. 1978.

10 NUREG 0841, "Final Environmental Statement Related to the Operation of Palo Verde Nuclear Generating Station, Units 1, 2, and 3", Section 5.9.1.4, February, 1982.

11 NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactor", Arpil 1991.

12 Environmental Report Operating License Stage, Palo Verde Nuclear Generating Station, December 1981.

13 PVNGS Updated Final Safety Analysis Report

14 Calculation 13-NC-ZY-252, "Annual Average Dose from Normal Operation Liquid Discharge from the Evaporation Pond", Rev 0.

15 Calculation 13-NC-ZY-253, "Annual Average Dose from Normal Operation Airborne Direct and Sky Shine from the Evaporation Pond", Rev 0.

16 Calculation 13-NC-ZY-254, "Radiation Dose Due to an Evaporation Pond Dike Failure During a Seismic Event", Rev. 0.

APPENDIX E

Changes to the Process Control Program

APS
Commitment. Innovation. Energy.

COMPANY CORRESPONDENCE

ID #: 218-02207– DJH
DATE: March 29, 2007

TO: John Gaffney
Sta. # 7297
Ext. # 8800

FROM: David J. Heckman
Sta. # 7815
Ext. # 5932

SUBJECT: Documentation of 2006 Process Control Program (PCP) Change Authorization

This letter meets the necessary documentation requirements for the October 2006 PCP change (CD-600) and provides information needed to complete the 2006 Annual Radioactive Effluent Release Report. The PCP is currently lacking a formal documentation process. Procedures 75RP-0RP04, "Radiological Reports," and 76DP-0RP03, "Radwaste Process Control Program," make references to the following:

75DP-0RP04, 3.2.2 – *The Radiological Service Department shall ensure the following PCP related information is included in the Annual Radioactive Effluent Release Report:*

3.2.2.1 Changes and PRB reviews of changes to the PCP made during the reporting period as required by 76DP-0RP03...

3.2.2.2 Documentation that the changes to the PCP have been reviewed and accepted by the PRB and approved by the Director, Radiation Protection...

3.2.2.3 ...a documented determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State or other applicable regulations.

76DP-0RP03, 3.7.4 – *For changes that are determined to be reportable, forward the PCP revision package to PRB for review and acceptance.*

3.7.4.1 After receiving review and acceptance from the PRB, forward the package to the Director, Radiation Protection for approval of the revision.

The constituents of the "PCP revision package" are not defined in 76DP-0RP03 and appropriate formal documents are not provided for PRB or RP Director acceptance and approval. Additionally, the "change" is not provided consisely in a reportable format as elements of the change are contained in both the written PCP (procedure) and in the physical process as described in the PCP Revision Notice.

ACT 2984559 has been generated to develop a permanent resolution to this issue. The following information is provided to meet the procedural documentation requirements only for the 2006 CD-600 change:

- In addressing the documented determination of 75DP-0RP04, 3.2.2.3, 50.59 Screening S-06-0462 (*provided as an attachment*) makes this statement: "*Waste is then transferred to a processing system (in this instance the CD-600) designed to create a final product that meets the PVNGS PCP.*" In meeting the final product requirements of the PVNGS PCP, the CD-600 product does "*maintain the overall conformance of the solidified waste product to existing requirements of Federal, State or other applicable regulations.*"

- In addressing the documentation requirement of 75DP-0RP04, 3.2.2.2, minutes of the October 8, 2006 PRB meeting are attached attesting to the acceptance of the CD-600 PCP change by the PRB.

- In accordance with the aforementioned requirement and 76DP-0RP03, 3.7.4.1, the following electronic signature verifies that the Director, Radiation Protection did approve the change and participated as a member of the PRB during the presentation of the
CD-600 PCP change:

Gaffney, John P(Z36459)

Digitally signed by Gaffney, John P(Z36459)
DN: cn=Gaffney, John P(Z36459)
Reason: I am approving this document
Date: 2007.04.05 16:00:51 -07'00'

Director, Radiation Protection

- The specific PCP change referred to in 75DP-0RP04, 3.2.2.1, is contained in part in the PCP Revision Notice (included as an attachment) and in Revision 6 to 76DP-0RP03. Specifically, the reportable change to the PCP was the addition of the CD-600 system setup and operating procedures to the PCP. In facilitating LRS processing with the CD-600 (versus the CD-1000), minimum dewatering/drying and processing times were reduced constituting a change in processing parameters that could cause an alteration in the final waste product characteristics.

DJH/cdd

Attachment

10 CFR 50.59 SCREENING

Screening/Evaluation Number: S-06-0462 **Revision:** 0

ACTIVITY UNDER REVIEW (DOCUMENT NUMBER/REVISION NUMBER):

76RP-0RW78, R 0, "CD-600 System Setup" 76RP-0RW79, R 1, "CD-600 System Operations"

DESCRIPTION OF PROPOSED ACTIVITY:

Review use of the mobile RWE NUKEM Corporation (RNC) CD-600 Solid Radwaste Processing System at PVNGS along with setup and operating procedures for compliance with the PVNGS PCP and all regulations and quidance concerning the processing and product waste form produced from the processing of wet radioactive waste in the CD-600.

(continue on Response Justification Page)

10 CFR 50.59 SCREENING	NO	YES
1. Does the proposed activity adversely affect a design function described in the UFSAR?	X	
2. Does the proposed activity adversely affect the method of performing or controlling a design function described in the UFSAR?	X	
3. Does the proposed activity replace or adversely revise an evaluation or method of evaluation described in the UFSAR?	X	
4. Does the proposed activity involve a test or experiment not described in the UFSAR, where an SSC is used or controlled in a manner that is outside the reference bounds of the design for the SSC or is inconsistent with analyses or descriptions as provided in the UFSAR?	X	
5. Does the proposed activity require a change to the Technical Specifications?	X	

I verify that the above screening is accurate and that I am currently qualified to perform activities as a 10 CFR 50.59 Screener/Reviewer.

Heckman, David J (Z00977)

Digitally signed by Heckman, David J(Z00977)
DN: CN = Heckman, David J (Z00977)
Reason: I am the author of this document.
Date: 2006.11.16 07:51:05 -07'00'

SCREENER (Digital Signature)

Murphy, Thomas W (Z01906)

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REVIEWER (Digital Signature)

10 CFR 50.59 EVALUATION

Screening/Evaluation Number: S-06-0462 **Revision:** 0

ACTIVITY UNDER REVIEW (DOCUMENT NUMBER/REVISION NUMBER):
76RP-0RW78, R 0, "CD-600 System Setup" 76RP-0RW79, R 1, "CD-600 System Operations"

10 CFR 50.59 EVALUATION	NO	YES
1. Does the proposed activity result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the UFSAR?	____	____
2. Does the proposed activity result in more than a minimal increase in the likelihood of occurrence of a malfunction of an SSC important to safety previously evaluated in the UFSAR?	____	____
3. Does the proposed activity result in more than a minimal increase in the consequences of an accident previously evaluated in the UFSAR?	____	____
4. Does the proposed activity result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the UFSAR?	____	____
5. Does the proposed activity create a possibility for an accident of a different type than any previously evaluated in the UFSAR?	____	____
6. Does the proposed activity create a possibility for a malfunction of an SSC important to safety with a different result than any previously evaluated in the UFSAR?	____	____
7. Does the proposed activity result in a design basis limit for a fission product barrier as described in the UFSAR being exceeded or altered?	____	____
8. Does the proposed activity result in a departure from a method of evaluation described in the UFSAR used in establishing the design bases or in the safety analyses?	____	____

I verify that the above evaluation is accurate and that I am currently qualified to perform activities as a 10 CFR 50.59 Evaluator/Reviewer.

EVALUATOR (Digital Signature)

REVIEWER (Digital Signature)

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RESPONSE JUSTIFICATION

INTRODUCTION:
The RWE NUKEM CD-600 solid radwaste processing system (CD-600) is an upgrade to the portable CD-1000 solid radwaste processing model used at PVNGS. Because of the abandonment-in-place of the original installed Hittman system (per SARCN #3476 in 1994), PVNGS can currently only process radioactive concentrates using temporary, portable technologies. Succinctly, processing through both systems occurs after liquid waste is reduced in volume to the capabilities of the installed LRS system and is collected in the form of concentrates in the Concentrate Monitor Tanks (CMTs). These concentrates are held and recirculated until they can be transferred through the truck connection valve (SRN-V111) via the Wet Waste Processing Subsystem (described in section UFSAR 11.4.2) of the Solid Waste Management System. Waste is then transferred to a processing system (in this instance the CD-600) designed to create a final product that meets the PVNGS PCP. As per UFSAR section 11.4.2.3, complete waste processing is IAW 76DP-0RP03, "Radwaste Process Control Program."

Use of the CD-1000 was evaluated in February of 2002 IAW the 10CFR50.59 evaluation process as implemented by site procedure 93DP-0LC07, "10 CFR 50.59 and 72.48 Screenings and Evaluations." At the time the evaluation was performed, it was determined that the connection of the CD-1000 to PVNGS systems "screened out" of the 10CFR50.59 process by reasons cited in an Applicability Determination (AD) documented in letter 115-02371-TSG/MHS (attachment). Specifics of this AD identified that connecting a mobile waste processing system does not constitute a temporary or permanent change to the power production facility as per section 1.2 and the flow chart in Appendix D of 93DP-0LC07, Revision 5. This Screening coheres to the findings of the 2002 AD as it applies to connecting the CD-1000 to plant systems and extends the AD to include the connection of the CD-600, which is similar to the CD-1000 in design and identical in its interface with plant systems. However, questions have arisen as to whether or not the very presence and use of a portable solid waste processing system at PVNGS:

1. Changes a design function as per Regulatory Guide 1.143, "Design guidance for Radioactive Waste Management Systems, Structures and Components Installed in Light-Water–Cooled Nuclear Power Plants,"
2. Constitutes an "unreviewed safety question" as per IE Circular 80-18, "10CFR50.59 Safety Evaluations for Changes to Radioactive Waste Treatment Systems,"
3. Requires a revision to an evaluation described in the PVNGS UFSAR,
4. Produces a final waste form that conforms to the PVNGS Process Control Program (PCP) IAW UFSAR 11.4.2.

Section 1.8 of the UFSAR commits PVNGS to Regulatory Guide 1.143 with exceptions. The CD-600 is constructed by RWE NUKEM to meet the guidance of ANSI/ANS-40.37-1993, "Standard for Low-Level Radioactive Waste Processing Systems," and the intent of R.G. 1.143. As a mobile radioactive waste processing system, the CD-600 meets the quality criteria of R.G. 1.143 as part of NUKEM's contractual agreement with PVNGS.

IEC 80-18, "10CFR50.59 Safety Evaluations for Changes to Radioactive Waste Treatment Systems" was written in August of 1980 and is still active and endorsed by HPPOS-086. IEC 80-18 instructs compliance with elements of 10CFR50.59 that are not in the current (Oct 4, 1999), amended (Dec 14, 2001) revision of 10CFR50.59. For instance, the term "unreviewed safety question" is no longer used, and documented screenings and applicability determinations were not part of 50.59 in 1980. Functionally, it is apparent that the intent of 80-18 was to reinforce the requirements of 10CFR50.59 which were not generally being applied to radioactive waste treatment systems across the industry. It is the position of PVNGS Radiological Engineering that the proper way to implement IEC 80-18 is by strictly adhering to the 50.59 process in its current revision as implemented by procedure 93DP-0CL07, with the following specifically considered in the evaluation:

- **The need for PRB review per UFSAR** – PRB review is necessary for this action as discussed in answering question 2.
- **Evaluation against Regulatory Guide 1.143** – In this action, all PVNGS radwaste SSCs are used in accordance with their design functions (note previous discussion on LRS, SRS and Wet Waste Subsystem). As previously discussed, the CD-600 meets the intent of R.G. 1.143.
- **Evaluation against Regulatory Guide 1.21 and UFSAR, section 11.5 for effluent monitoring and sampling controls.** - The Effluent Monitoring Program is implemented at PVNGS per 74DP-9CY08, "Radiological Monitoring Program." Operation of the CD-600 is within the Radwaste Building and is therefore bounded by in-plant RMS monitoring. No additional monitoring is necessary, nor is a change necessary to the ODCM. IEC 80-18 also requires that this action be bounded for uncontrolled releases to a small fraction of the 10CFR100 guidelines. This bounding is discussed in depth in answering question 1.

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The following UFSAR requirements were also considered during this screening:

TRM 5.0.500.4, "Radioactive Effluent Controls Program" promulgates the PVNGS ODCM and effluent release limits to members of the public. As previously discussed, effluents from the CD-600 are through the RW Building ventilation system, which is monitored. No changes to the ODCM are necessary as a result of this action. Catastrophic release is bounded by PVNGS UFSAR, 15.7.2, 15.7.3 and 2.4.13.

Table 9.5-1 of the UFSAR addresses the issue of fire protection in the Radwaste Truck Bay where the CD-600 is operated. Notably, the area is not designated as a safety-related area as per UFSAR 9B.2.10.2. The only consequence of a fire might be the release of the contents of the evaporator body, which is bounded by PVNGS UFSAR, 15.7.2, 15.7.3 and 2.4.13.

TRM 5.0.500.17, "Process Control Program (PCP)," requires the maintenance of a PCP program. Changes will be initiated to 76DP-0RP03, "Radwaste Process Control Program," section 3.1.1 to add new CD-600 procedures, 76RP-0RW78, "CD-600 System Setup," and 76RP-0RW79, "CD-600 System Operations."

TLCO 3.10.200, "Liquid Holdup Tanks," imposes a 60 Curie limit to all outdoor radwaste tanks that are not surrounded by liners, dikes, or walls. The CD-600 will be operated inside the Radwaste Building and is therefore, not subject to this limit. However, even if the CD-600 were used outside, it would not reach the 60 Curie limit. Using the UFSAR maximum inventories for the CMTs from Table 12.2-5, a total curie content of approximately 866 Curies can be derived. Since the CD-600 can hold only 1/50 of the contents of the CMT, the maximum curie content for the CD-600 would be below 18 Curies.

QUESTIONS:

Question 1) Does the proposed activity adversely affect a design function described in the UFSAR? NO

The design bases for the Liquid and Solid waste management systems that might be challenged by this action are described in Sections 11.2.1.C (10CFR50 Appendix I release limits) and 11.4.1.A (SRS process capabilities) of the UFSAR. As per the introduction, the CD-600 is constructed by RWE NUKEM under a Quality Assurance Program that meets ANSI/ANS-40.37-1993 and the intent of R.G. 1.143 and provides the capability to process and package wet waste. Therefore, this activity does not adversely affect the design function of the SRS described in 11.4.1.A.

Stated as part of the design basis in section 11.2.1.C, is the consideration of the effect of LRS design on dose to the public within 50 miles of the site (per 10CFR50 Appendix I). While the CD-600 is technically not part of the LRS, it is processing liquid radwaste; therefore, the impact of its operation on dose to the public should be considered pursuant to NEI 96-07 and 10CFR50.59.

The CD-600 evaporator chamber processes concentrates in batches received from the CMTs. While the CMTs each hold 5,000 gallons of concentrates, the CD-600 can only process 100 gallons (200 for the CD-1000) at any given time. Each batch is dried and the product drummed in DOT-7A containers prior to receiving another subsequent batch. Since the CD-600 is located in the RW Building and all liquids would be captured by the designed berms and drain system, gaseous release from such an accident is of primary concern. During normal operation the CD-600 vents to the RW Building ventilation system, hence any release of radioactive material from the CD-600 is monitored and quantified by the plant RMS system and station procedures. In the event of a leak, the consequences of a complete breach of the CD-600 could easily be bounded by determining the consequences of a postulated rupture of a CMT (which could contain 50 times more activity than the CD-600). During licensing, PVNGS chose to use a Refueling Water Tank (RWT) rupture as its bounding Liquid Tank Failure in UFSAR sections 15.7.2 and 15.7.3. This was found acceptable to the NRC as noted in Q&A 15A.4 (NRC Question 460.19); however, the NRC did perform an analysis of a rupture in our CMTs per Standard Review Plan (NUREG-0800) SER 15.4.9. The conclusions reached in UFSAR SER 15.4.9 were that a catastrophic failure of the CMT would result in dose to the public <1% of applicable 10CFR20 limits. The analysis in UFSAR 15.7.3.4 demonstrates that a catastrophic failure of the RWT would result in dose to the public <1% of applicable 10CFR100 limits. In both scenarios, dose to the public within 50 miles is maintained within the limits of 10CFR50, Appendix I.

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Hence, normal operation as well as the consequence of a catastrophic rupture of the CD-600 is bounded by existing analysis and will not adversely affect the design basis cited in UFSAR 11.2.1.

The description of the Low Level Storage Area (LLSA) in section 11.4.2 identifies that, by design, there is 350 square feet of usable floor area in the LLSA. Operation of the CD-600 constitutes an appropriate use of this floor space. Therefore, the presence of the CD-600 does not constitute a condition adverse to the design of the LLSA.

UFSAR ALARA design Table 12.1-1 identifies the design radiation zones for areas within the plant. Drawing 13-N-RAR-002 shows that the Low Level Storage Area, in which processing and temporary storage occur, is a radiation zone 3 with design dose rates below 2.5 mR/hr. Drums of processed wet waste with dose rates of several hundred mRem/hr have been produced at PVNGS using the CD-1000. Drums of waste are temporarily posted, then shielded by placing them in large shielding containers. A review of routine area radiation surveys indicates that the general area in the Low Level Storage Area has consistently been maintained below 2 mR/hr and excursions above 2.5 mR/hr have been temporary, with posting and access control IAW the PVNGS RP Program. Therefore, the processing of waste with the CD-600 does not constitute a condition adverse to the designed radiation zone 3 designation for the LLSA.

Question 2) Does the proposed activity adversely affect the method of performing or controlling a design function described in the UFSAR? NO

The methods of performing and controlling the design functions identified in USFAR 11.2.1 and 11.4.1 for the LRS and SRS are contained in the site PCP (see answer to question 1). Because the CD-600 is marginally different than the CD-1000, new procedures have been written for the setup and operation of the unit. Setup of the CD-600 is IAW new procedure 76RP-0RW78, "CD-600 System Setup," and operation is IAW 76RP-0RW79, "CD-600 System Operations." Procedures for Radioactive Waste Management are identified in UFSAR 13.5.2.2.E. Accordingly, changes to the PCP must be reviewed by the Plant Review Board (PRB) prior to becoming effective. IAW 76DP-0RP03, "Radwaste Process Control Program," step 3.7.1.1 states:

> *Any change in processing parameters that could cause an alteration in the final waste product characteristics (e.g., changing: minimum dewatering /drying times or temperatures, processing time or temperature for concentrate evaporation, vendors, or methods for processing liquid waste, etc.).*

Because the CD-600 will reduce processing times and will process smaller volume batches, the use of the CD-600 requires PRB approval. PRB approval for the use of the CD-600 is also conservatively necessary per 13.4.2.6 (h), as this action may be perceived to be a "*major change*" to the solid waste treatment system.

76DP-0RP03, "Radwaste Process Control Program" will require an administrative change to include the CD-600 procedures to section 3.1.1, "PCP Procedures." However, by design, the CD-600 will produce the same final waste product as that produced by the CD-1000. Therefore, this action does not adversely affect the method of performing or controlling the design function of the LRS and the SRS as described in the UFSAR.

Question 3) Does the proposed activity replace or adversely revise an evaluation or method of evaluation described in the UFSAR? NO

Evaluations relevant to this action are those concerning the wet waste product waste form (per PCP) and those involved in determining the consequences of an uncontrolled release in the form of a rupture of the CD-600 evaporator.

CD-600 product waste form is per 76DP-0RP03, "Radwaste Process Control Program," IAW NRC Technical Position on Waste Form, Rev 1, January 1991, 10CFR61, 10CFR71 and other pertinent publications. Administrative changes to the PCP resulting from this action are pending as discussed in the answer to question 2.

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PVNGS used a Refueling Water Tank (RWT) rupture as its bounding evaluation for a Liquid Tank Failure in UFSAR sections 15.7.2 and 15.7.3. The consequence to ground water of this postulated rupture is addressed in UFSAR section 2.4.13. The evaluation for this Liquid Tank Failure is contained in Calculation 13-NC-ZY-202. The resulting analysis in section 15.7.3.4 demonstrates that a gaseous release from catastrophic failure of the RWT would result in a dose to the public of <1% of 10CFR100 limits. Consequently, this activity is bounded by existing UFSAR analysis and will not require any revision to supporting calculations. Hence, this activity does not replace or adversely revise any evaluation or method of evaluation described in the UFSAR.

Question 4) Does the proposed activity involve a test or experiment not described in the UFSAR, where an SSC is used or controlled in a manner that is outside the reference bounds of the design for the SSC or is inconsistent with analyses or descriptions as provided in the UFSAR? NO

Initial Radwaste system testing criteria for the installed SSCs are located in UFSAR 14.B.48. The CD-600 is not subject to these test criteria, but must meet ANSI/ANS-40.37 and the relevant provisions of R.G. 1.143. All tests and experiments involved in the proper classification of wet wastes are identified in the PCP and its implementing procedures IAW TRM 5.0.500.17. Tests and experiments involved in the PCP are not specifically delineated in the UFSAR; however, they are consistent with analyses and descriptions within the reference bounds of the radioactive waste systems' design and will not be modified as a result of this action.

Question 5) Does the proposed activity require a change to the Technical Specifications? NO

There are no Technical specifications directly associated with connecting or operating a mobile radioactive waste processing unit.

TS 5.7, "High Radiation Area," prescribes the administrative controls for High Radiation Areas at PVNGS. These controls are implemented by the PVNGS RP Program. As discussed in Question 1, the LLSA is subject to excursions in dose rates when processing wet waste with the CD-600. Transitory High Radiation Areas are dealt with by shielding or moving the source to an appropriate storage area and/or by posting and controlling access. No Change is required to TS 5.7.

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REFERENCES:

1) UFSAR, Revision 13, List E, dated 08/2005.
2) 76DP-0RP03, "Radwaste Process Control Program," Rev. 5, effective 6/7/05.
3) 93DP-0LC07, "10 CFR 50.59 and 72.48 Screenings and Evaluations," Revs. 4 (eff. 9/14/01) and 14 (7/11/06-active).
4) PVNGS Letter 115-02371-TSG/MHS, 2/19/02.
5) USNRC IEC 80-18, "10CFR50.59 Safety Evaluations for Changes to Radioactive Waste Treatment Systems," 8/22/1980.
6) USNRC Regulatory Guide 1.143, "Design guidance for Radioactive Waste Management Systems, Structures and Components Installed in Light-Water–Cooled Nuclear Power Plants," Rev. 0, 1978.
7) ANSI/ANS-40.37-1993, "Standard for Low-Level Radioactive Waste Processing Systems."
8) 74DP-9CY08, "Radiological Monitoring Program," Rev. 15, effective 7/28/06.
9) USNRC 10CFR50, "Domestic Licensing of Production and Utilization Facilities," 1/13/1998.
10) NEI 96-07, "Guidelines for 10CFR50.59 Implementation," Revision 1, Nov. 2000.
11) UFSAR SER 15.4.9, "Liquid Tank Failures," November 1981.
12) USNRC Standard Review Plan (NUREG-0800), Section 15.7.3, "Postulated Radioactive Releases Due to Liquid Containing Tank Failures," Rev. 2, July, 1981.
13) PVNGS Drawing 13-N-RAR-002, Rev. 3, 10/21/1997.
14) 76RP-0RW78, "CD-600 System Setup," effective 08/30/06.
15) 76RP-0RW79, "CD-600 System Operations," effective 08/30/06.
16) USNRC 10CFR61, "Licensing Requirements for Land Disposal of Radioactive Waste," as amended 11/2/01.
17) USNRC 10CFR71, "Packaging and Transportation of Radioactive Material," as amended 8/2/2006.
18) PVNGS Calculation 13-NC-ZY-202, "Storage Water Tank Failure, EAB and LPZ Dose," Rev. 11, April 2000.
19) ANSI/ANS-40.37, "Mobile Radioactive Waste Processing Systems," 1993.

Palo Verde Nuclear Generating Station

Plant Review Board Monthly Meeting
Meeting 06-023
October 18, 2006

I. VERIFICATION OF QUORUM

Members:	10/18/06
J.H. Hesser (Chair)	X
E.C. Sterling	X
M.D. Shea	X
L.C. Zell	X
J.P. Gaffney	X
M.E. Powell	X
G.J. Bucci (Alternate)	X
D.E. Coxon (Alternate	X

The Board assembled at approximately 1:04PM on October 18, 2006. Mr. Hesser verified that a quorum existed (at least five members with no more than two alternates meeting the minimum requirement of five). Mr. Clyde conducted a peer check. Verification completed for training and qualifications by Mr. Clyde, and the meeting convened at approximately 1:05PM.

	10/18/06
Technical Assistant:	
M.L. Clyde	X
Guests:	
E. Flodin	X
D. Marks	X
D. Vogt	X
T. Weber	X
R. Rogalski	X
S. Koski	X
T. Gray	X
E. Heckman	X

II. PREVENT EVENTS BRIEFING

Mr. Hesser conducted the Prevent Events briefing. Several members noted that they needed 50.59 overview training since it is approaching one year since their designation as member/alternate. Mr. Roehler is reviewing the conduct of past training and has indicated that he will provide the schedule for training.

III. AGENDA

Mr. Hesser reviewed the agenda for the August Monthly PRB meeting (Attachment A).

Plant Review Board Monthly Meeting
Meeting 06-023
October 18, 2006

IV. MEETING MINUTES

Meeting Minutes MMPRB06-017 were approved with abstentions by Messrs. Powell, and Coxon.

Meeting Minutes MMPRB06-020 were approved with abstentions by Messrs. Shea and Bucci.

Meeting Minutes SMPRB06-022 were approved with abstentions by Messrs. Coxon and Sterling.

V. MONTHLY PRB REPORT

Presentation of The PRB Monthly Report for September 2006 (Attachment B) occurred with Mr. Vogt, Mr. Flodin and Mr. Marks providing the details. No safety channels were in trip/bypass for greater than seven days. Unit 1 shutdown on September 19 for pressurizer heater replacement, Unit 2 shutdown on September 30 for commencement of U2R13 and Unit 3 operated at 100% for the month of September. No operator work-arounds required management attention.

Mr. Flodin discussed the reactivity management portion overall designated as white. There were two level 4 human performance issues and six level 4 equipment issues. The human performance issue was an overly conservative action required by procedures. The procedures are in revision to review the need for the action when changing from abnormal Blowdown to normal Blowdown. The equipment issues documented three COLSS failures, two of which were not associated with a CRDR. Mr. Sterling questioned why a CRDR was not initiated. Messrs. Vogt and Flodin said they would ensure CRDRs were initiated.

Mr. Vogt discussed issues in the other safety function areas. There were no new issues for reactivity control.

For the safety function Maintenance of Vital Auxiliaries, Mr. Vogt reported the new issues in the following:

- Issuance of an IOD occurred for Unit 2 due to minor oil leakage from the lube oil sight glass for the B EDG. The basis for the IOD was engineering's evaluation of the condition noting that the minor leakage was insufficient to impact the ability of EDG to perform its specified function for the duration of its mission time.
- Initiation of a functional assessment was completed for the U3 EDG B starting air compressor A due to low oil viscosity with corresponding low flash point. Oil changes are scheduled every six weeks until the compressor is replace in December to provide assurance that the viscosity and flash point remain within specification.

- Six IODs were required due to fastener issues on EDGs for all three units. The identification of these issues resulted from concentrated walk downs of all of the diesels and has resulted in approximately sixteen items in each unit. Types of findings are planned for implementation in non-licensed operator training to allow better identification by Operations. Mr. Shea asked the question regarding the aggregate affect of all of the deficiencies. After the Board discussed the issues, an action was assigned to Mr. Andrews to have Steve Payne and other members of the DG system team brief the Board. The action is to address cumulative / aggregate impact of the degraded conditions that resulted in the large number of IODs. The Board briefing should contain the recovery plan developed by the System Team.
- The IOD and resulting POD for the K-1 relay was also discussed by the Board. This subject needs to be covered in the briefing for the DG system.

For the safety function of Inventory Control, Mr. Vogt reported the new issues in the following:

- Initiation of a functional assessment was completed due to wear products causing a color change in the Unit 2 E charging pump gearbox. Engineering assessed the results of the lubrication laboratory tests and concluded that discoloration was due to wear products. Iron content had increased from 44 ppm in May 2006 to 238 ppm in September 2006. The oil will be changed out at the earliest opportunity but until then, monthly samples will be taken to assess any further degradation. The functional assessment concluded that the equipment remained functional.
- An IOD was initiated for the Unit 1 HPSI outboard pump bearings. Both Unit 1 pumps presently have light pre-load bearings installed. This bearing type has no approved MEE. A follow-up POD was approved for the issue. The Board mentioned that this was a nonconforming condition.
- An POD was initiated and approved by the Unit 3 Shift Manager for the inconsistent flow rates for the charging pumps with respect to assumptions made in the safety analysis when instrument uncertainty is applied. The POD will be attached to CRDR 2925248.

For the safety function of Heat Removal, Mr. Vogt reported the new issues in the following:

- Several PODs were revised or initiated with respect to the issues related to SP chemistry affecting all three units.

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For the safety function of Containment Temperature and Pressure Control, Mr. Vogt reported the following:

- A POD was initiated in Unit 3 for scratches on the stem of SIA-HV684, the containment spray discharge to shutdown cooling heat exchanger discharge. The IOD had concluded operability was maintained and the POD provided the additional basis support.

For the safety function of Containment Combustible Gas Control, one new issue was identified by the Unit 1 Control Room staff while performing the LOC 163 review of WM 2924075. The work mechanism identified a loose and intermittent trickle charge indicating light for the B HP recombiner. The System Engineer consulted the Vendor Technical Document and associated internal wiring diagrams to conclude that it has no impact on the recombiner's capability to perform its safety function. The Unit1 Shift Manager concurred.

The Board identified no issues affecting nuclear safety during the review of the Monthly report.

The Board reviewed six LER issued during September 2006. Unit 1 LERs were both supplements and Unit 2 had one supplement and three new LERs.

LER #2-2006-002-00 involved reporting that the watertight door between the A and B train Auxiliary Feedwater Pump rooms was not secured. There were also no compensatory measures in place. When door C-A-06 is open with the unit operating in Mode1, compensatory action must be taken in order to maintain both AF trains operable. Based on the Security Computer transactions, the Control Room staff determined that the door was open approximately 4 hours and 20 minutes. With this condition, both A and B trains of AF were considered inoperable. Upon further investigation it was concluded that Fired Department personnel had failed to close C-A-06 after leaving the pump room. In the past three years there were two similar events reported.

LER #2-2006-003-00 documented the Unit 2 reactor trip that occurred on July 26, 2006. The preliminary root cause was implementation of inadequate action plan for corrective maintenance, which did not accommodate for the build up of condensate in the isolated main turbine piping associated with Control Valve #2. This occurred due to a belief that the maintenance evolution was equivalent to control valve testing. A similar event caused by a main turbine upset occurred on June 7, 2004 in Unit 3, when a main turbine EHC system malfunction caused main turbine control and intercept valves to close, resulting in a reactor trip.

LER #1-2005-001-02 provided the direct cause of the Unit 1 NAN-S06 power failure. The electrical fault initiated as a C phase to ground fault and transition to a three phase

to ground fault. The fault was terminated when the normal feeder breaker NAN-S06H opened on protective relaying. The actions to prevent recurrence were added in this supplement.

LER #1-2003-001-01 supplemented information regarding the lift pressure verification testing on four pressurizer safety valves (PSV) that were removed for testing during the tenth refueling outage in Unit 1. The testing revealed that the as-found lift pressure for on of the four PSVs was outside of the Technical Specification limits. The as-found PSV condition appears to be the result of a degraded spring. The equipment root cause failure analysis found that the valve spring did not meet the vendor's inspection criteria for squareness. The out of tolerance condition was evaluated and it was determined the results, based on the as-found conditions, were bounded by the peak RCS pressure results of the current Loss of Condenser Vacuum analysis of record. The supplement provided an update to the cause.

LER #2-2006-004-00 reported the failure of FWIV #174 on July 27, 2006 due to a failed four-way valve lodged in the center blocked position. Evaluation concluded that the condition would have prevented fast closure of the FWIV upon receipt of a main steam isolation signal and had existed since approximately 2100 on July 13, 2006. This exceeded the Technical Specification required action time. The four-way valve was replaced and the FWIV was declared operable on July 28, 2006. The preliminary cause was that the failed condition of the four-way valve was not known to operators until the accumulator failed to recharge on July 27, 2006. The cause of the failure of the four-way valve is under investigation.

LER #2-2003-003-01 provided a supplement to identify the direct cause associated with the inoperable Source Range Monitor in Unit 2 during Mode 6 operations. The direct cause was identified as a loose cable connection for channel 2 source range input cable at the Auxiliary Building/Containment Building penetration. The root cause was identified as an incorrect operability decision resulting in a violation of Technical Specification 3.9.2.

One non-reportable event occurred as follows:
CRDR 2928433 documents an improper use of Flashing Lights for posting a LHRA when it was possible to erect a physical barrier. This use of flashing lights versus physical barrier occurred during the Unit 1 forced outage to replace pressurizer heaters.

The Board noted no nuclear safety issues for any of the LERs.

VI. PROPOSED LICENSING CHANGES

Mr. Rogalski presented LDCR 06-007, which makes three changes to the Technical Requirements Manual and deletes SR 3.11.101.10. The surveillance requirement is developed from two NFPA standards (24 and 25) that deal with installation of fire protection piping. Mr. Koski informed the Board that the past ten performances of the testing had not debris recovered. Mr. Zell questioned FME possibilities in the future with this testing being deleted. The response was the two standards and the test methodology was for piping installation and major flushing post-installation. Current practices ensure limiting FME. Mr. Hesser asked about retest activities post-maintenance without the surveillance test in place. Flushing could still be invoked without the surveillance requirement in place. Mr. Sterling mentioned that there was no content in the document discussing the chemical content of the water and its potential for corrosion, precipitation or fouling. The evaluation will be updated to address this concern. In response to a system level corrosion question by Mr. Bucci, annual water samples and corrosion coupons are taken and evaluated.

The Board withheld approval pending changes.

Mr. Heckman presented changes proposed to the Process Control Program (PCP) to the Board (Attachment C). PRB review for PCP changes is specified in UFSAR Section 13.4.2.6H. The proposed change consisted of using a different model of Solid Radwaste processing machine, the CD-600. The current PCP has the use of the CD-1000 as the Solid Radwaste processing machine. The 10CFR50.59 Screening addressed any potential impact to the licensing basis and found none. The final waste form is the same for both the CD-1000 and the CD-600. Required procedures are in place for operation of the proposed unit. The primary reason for changing to the CD-600 is increased reliability of the machine. There were no comments from the Board. The change to the PCP was approved unanimously.

Mr. Rogalski returned LDCR 06-007 as a revision only addressing TRM LCO 3.11.100. The controversial section in the discussion above will be brought back for later review. The only change proposed by this version of the LDCR is allowing the use of the Plant Computer and multipoint recorder with an audible alarm in lieu of requiring an eight-hour tour. The Board approved the revised LDCR unanimously.

VII. PRB ACTION ITEMS

Mr. Hesser announced that the future expectation for completion of action items is one month. Insufficient time remained for the coverage of the actions on the agenda plus the members assigned actions were not in attendance.

VIII. OTHER ITEMS FOR REVIEW

The Board decided that 10CFR50.59 training would be a continuing training requirement for members and alternates instead of a one-time performance.

IX. PROPOSED AGENDA ITEMS for FUTURE PRB MEETINGS

No additional items proposed.

X. MEETING ADJOURNMENT

The Chairman accepted a recommendation for adjournment of the meeting. He requested a response by all members on whether there were any nuclear safety issues that had been left unresolved or required further immediate action. With none noted by any of the members, he adjourned the meeting at approximately 3:36PM.

Submitted by: PRB Technical Assistant

Clyde, Miles L(Z25215)

Digitally signed by Clyde, Miles L (Z25215)
DN: CN = Clyde, Miles L(Z25215)
Reason: I am the author of this document.
Date: 2006.12.22 15:47:14 -07'00'

Approved by: PRB Chairman

Shea, Michael D (Z02452)

Digitally signed by Shea, Michael D(Z02452)
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Reason: I am approving this document.
Date: 2006.12.27 08:37:41 -07'00'

PCP Revision Notice

Date: 10/14/06 Page 1 of 1

Originator: David Heckman Ext.: 5932

Description of Revision:
Approval of the NUKEM CD-600 radioactive waste processing system for use at PVNGS IAW UFSAR 13.5.2.2.E and 13.4.2.6 (h).

☐ Revision is NOT reportable - PRB review, R.P. Director approval, and reporting in the annual Radioactive Effluent Release Report are not required.

☑ Revision is reportable - Requires PRB review, R.P. Director approval, reporting in the annual Radioactive Effluent Release Report, and a justification for the revision below.

Justification for Revision: (*Ensure the following items are addressed*)
(*UFSAR 13.5.2.2.E*)

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

Justification for change is IAW attached 50.59 screening.

IAW 76DP-0RP03, 3.7.1.1, A reportable change to the PCP consists of:
...Any change in processing parameters that could cause an alteration in the final waste product characteristics (e.g., changing: minimum dewatering / drying times or temperatures, processing time or temperature for concentrate evaporation, vendors, or methods for processing liquid waste, etc.).
The CD-600 has a smaller evaporator body and will reduce the process batch volume by 50% with the result being a shorter drying time.
Additionally, Pursuant to UFSAR, 13.4.2.6 (h), PRB approval is required for a major change to a liquid radwaste treatment system. The introduction of the CD-600 radwaste processing system is conservatively viewed as a major change to an liquid radwaste processing system.

Approved By: Fladager, Mark A (Z35545) Digitally signed by Fladager, Mark A(Z35545) DN: CN = Fladager, Mark A(Z35545) Reason: I am approving this document. Date: 2006.10.17 16:07:49 -07'00' Date:

Radiological Services Department Leader

Use additional pages as required. 76DP-0RP03, Appendix-A

The purpose of this procedure is to describe the Process Control Program (PCP) used at Palo Verde Nuclear Generating Station (PVNGS) to process various radioactive "wet wastes", including resin slurries, evaporator bottoms, and filter cartridges. This procedure also describes the procedural controls governing revisions to the PCP, delineates criteria used to evaluate the reportability of changes made to the PCP, and describes the reporting requirements.

Procedure Level of Use is Information

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1.0 PURPOSE and SCOPE

1.1 Purpose (RCTS 032630-01)

1.1.1 This procedure describes the Process Control Program (PCP) at Palo Verde Nuclear Generating Station (PVNGS) for processing radioactive wet waste. This plant-specific PCP establishes a set of process parameters which provide boundary conditions within which reasonable assurance can be given that the processed waste will contain essentially zero free liquid and have appropriate waste form characteristics. (Branch Technical Position ETSB 11-3)

- Technical Requirements Manual, section 5.0.500.17, states, "The purpose of the Process Control Program is to contain the current formulas, sampling, analyses, test, 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, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste."

1.1.2 Complete waste processing and absence of free liquid prior to shipment is assured by the implementation of a process control program consistent with the recommendations of Branch Technical Position ETSB 11-3. (UFSAR 11.4.2.3.1)

1.1.3 The program will comply with applicable federal and Arizona state regulations. Implementation of the PCP will be in accordance with applicable portions of the PVNGS Quality Assurance program.

1.1.4 This PCP should be implemented to maintain any potential radiation exposure to plant personnel to "as low as is reasonably achievable" (ALARA) levels, in accordance with 75DP-0RP03, "ALARA Program Overview."

1.2 Scope

1.2.1 This program applies to processing of radioactive wet waste using plant-installed systems, plant portable processing systems, and vendor provided portable processing systems at PVNGS.

1.2.2 The process control program does not apply to radioactive waste that is shipped off site for additional processing prior to disposal.

2.0 RESPONSIBILITIES

2.1 The Vice President, Nuclear Production

Ensure the performance of a review by a qualified individual/organization of changes to the Process Control Program (PCP).

2.2 The Director, Radiation Protection

2.2.1 Review and approve any reportable changes to the Process Control Program. (UFSAR 13.5.2.2.E)

2.2.2 Ensure that reportable changes to the PCP are forwarded to the Plant Review Board (PRB) for review and acceptance prior to implementation. (UFSAR 13.4.2.6.h)

2.3 Radiological Services Department Leader (RSDL)

2.3.1 Implement the Radwaste Process Control Program.

2.3.2 Provide an independent review of proposed changes to the Process Control Program.

2.3.3 Make changes to the PCP as necessary to maintain compliance with State and Federal Regulations, Licensing commitments, and burial site requirements.

2.3.4 Report changes to the Process Control Program to the NRC in the Annual Radioactive Effluent Release Report for the period in which they were made. This submittal should contain: (UFSAR 13.5.2.2.E)

- Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
- A determination that the change did not reduce the overall conformance of the processed waste product to existing criteria for solid wastes.

2.3.5 Monitoring the activities of vendor personnel to assure vendor compliance with the Process Control Program and the PVNGS Quality Assurance Program.

2.3.6 Review and approve vendor radioactive waste processing procedures through the PVNGS procedure approval process.

2.3.7 Ensuring personnel under his control are fully aware of, and operate equipment in compliance with, the Process Control Program.

2.3.8 Establish and maintain records documenting the PCP periodic reviews, revision technical reviews, records of the review and evaluation of changes to the PCP, and PCP implementing procedures.

3.0 PROCESS CONTROL PROGRAM

3.1 Description

The process control program (PCP) consists of the procedures and processes by which processing and packaging of low-level radioactive wet waste is accomplished and which provide reasonable assurance of compliance with low-level waste requirements. While other procedures may be used in the course of processing and packaging the affected waste types, only those identified in this procedure are considered to be within the scope of the PCP. (CRDR 981853-06)

3.1.1 PCP Procedures:

- 76DP-0RP03, Radwaste Process Control Program
- 76RP-0RW05, Packaging and Classification of Radioactive Waste
- 76RP-0RW08, High Integrity Container Setup and Closure
- 76RP-0RW09, Transfer, Storage, and Processing of Radioactive Filters
- 76RP-0RW12, PVNGS Resin Drying System
- 76RP-0RW78, CD-600 System Setup
- 76RP-0RW79, CD-600 System Operations
- Any vendor procedure used in processing or packaging wet waste

3.1.2 PCP Processes

- Dehydration (evaporation) or solidification, such as with evaporator concentrates
- Dewatering or drying, such as with bead resin
- Packaging any radioactive material in a High Integrity Container

3.1.3 Wet Waste Types

The various wet waste types within the scope of the PCP at PVNGS are:

- Evaporator concentrates from a forced recirculation evaporator.
- Radioactive bead resin waste.
- Radioactive spent filter cartridges.
- Radioactive sludge.
- Other miscellaneous wet wastes, as determined by R.P. supervision.

3.2 Precautions and Prerequisites

3.2.1 The radiological requirements necessary for implementing the Process Control Program are contained in 75DP-0RP01, "RP Program Overview " and the other procedures of the RP program. (RCTS 032648-01)

3.2.2 All radioactive wet waste processing will be accomplished in accordance with approved procedures.

3.2.3 The final waste product of all wet waste processing evolutions must be verified by a PVNGS representative. (IEN 87-07)

3.2.4 Waste generators are allowed to stabilize Class B & C waste by placing waste in a High Integrity Container (HIC) provided there is an associated topical report that has been approved by the NRC or for which a Certificate of Compliance, or other State Approval document, has been issued. (IEN 89-27)

3.2.5 Waste generators who use polyethylene containers for the disposal of Class B and Class C waste should either: (IEN 89-27)

- Place and ship the polyethylene container in an approved HIC, or
- obtain assurance and documentation from the disposal site operator that structural stability consistent with Part 61 will be provided at the site.

3.2.6 When packaging wet waste in a HIC, the effects of transportation on the amount of drainable liquid that might be present should be considered. (BTP on Waste Form, Rev.1, 1/91)

3.3 Process Parameters (CRDR 981853-06)

3.3.1 Proper waste characteristics for Class A wet waste will be assured by adhering to the conditions prescribed in applicable procedure(s).

3.3.2 For Class B and Class C waste, a portable processing system may be used in accordance with approved operating procedures and a 10 CFR 61 Topical Report approved by the NRC, the burial facility, or its regulating agency.

3.3.3 Evaporator Concentrates – complete processing of the waste batch and absence of free liquid is assured by meeting the time and temperature requirements specified in operating procedures for the equipment used to process concentrates for burial.

3.3.4 Ion exchange resins may be dewatered in accordance with the Process Control Program and a 10 CFR 61 Topical Report approved by the NRC, the burial facility, or its regulating agency. The parameters specified in the topical report ensure the final waste product will have appropriate waste form characteristics.

3.3.5 Radioactive spent filters, and other appropriate radioactive material, may be placed in an approved High Integrity Container for disposal, in accordance with approved procedures and the container Certificate of Compliance (C of C).

3.4 Vendors

3.4.1 Vendor operating procedures will undergo the same review and approval process as PVNGS procedures.

3.4.2 Vendor activities will be monitored to assure vendor compliance with the Process Control Program and the PVNGS Quality Assurance Program

3.4.3 If vendor processing is utilized, a PVNGS representative will verify proper processing of the waste product in accordance with the PCP, the vendor's operating procedure, and a 10 CFR 61 Topical Report approved by the NRC, if applicable.

3.5 Waste Sampling

3.5.1 Sampling requirements for the various wet waste streams are contained in 76RP-0RW03, Waste Stream Sampling and Database Maintenance.

3.6 Stability Requirement

The waste class of radioactive wet waste should be evaluated in accordance with 76RP-0RW05, "Packaging and Classification of Radioactive Waste," prior to packaging to ensure meeting the stability specifications of 10CFR61.56, "Waste characteristics," and the Branch Technical Position ETSB 11-3 (Revision 2, July 1981).

3.7 Process Control Program Revisions

3.7.1 Reportable change(s) to the Process Control Program consist of the following: (CRDR 981853-05)

3.7.1.1 Any change in processing parameters that could cause an alteration in the final waste product characteristics (e.g., changing: minimum dewatering/drying times or temperatures, processing time or temperature for concentrate evaporation, vendors, or methods for processing liquid waste, etc.);

3.7.1.2 Any change to the purpose, scope, or intent of the PCP;

3.7.1.3 Any change to the PCP that might cause inconsistencies with the NRC Waste Form Technical Position Paper (Rev. 1, January 1991), or Branch Technical Position - Effluent Treatment Systems Branch 11-3, section II (Rev. 2, July 1981).

3.7.2 The Radiological Services Department Leader will review proposed changes to Process Control Program processes, including the determination of reportability.

3.7.2.1 If the proposed revision does not meet any of the criteria in step 3.7.1, then the change is not reportable. That determination will be documented in one of two ways. Either by:

- placing a brief description on Appendix A, PCP Revision Notice, marking the appropriate box, and a signature by the RSDL, or
- annotating in the procedure change record that the change is not reportable. The RSDL signature for approval of the procedure revision will indicate his concurrence that the revision is not reportable.

3.7.2.2 If the proposed revision is reportable, then Appendix A will be completed, with the appropriate box marked, and it will be signed by the RSDL to indicate his approval.

3.7.3 Document the evaluation of reportable changes to any affected process on Appendix A, "PCP Revision Notice," and attach to the change document (e.g., procedure, 50.59, etc.). Documentation for reportable changes to the PCP shall include the following:

3.7.3.1 Sufficient details to totally support the rationale for the change;

3.7.3.2 A determination that the change did not reduce the conformance of the final waste product to existing criteria for waste disposal.

3.7.4 For changes that are determined to be reportable, forward the Process Control Program revision package to PRB for review and acceptance. (UFSAR 13.4.2.6.h)

3.7.4.1 After receiving review and acceptance from the PRB, forward the package to the Director, Radiation Protection for approval of the revision. (UFSAR 13.5.2.2.E)

3.7.5 Copies of the following documents should be maintained on file by Radiological Engineering:

- Appendix A, "PCP Revision Notice "
- Cross-Discipline Reviews, if applicable
- Any associated 10 CFR 50.59 reviews and evaluations

3.8 Record Retention

3.8.1 Records of reviews performed for changes made to the PCP shall be retained for the duration of the operating license, or the requirements of the insurer, whichever is greater. (UFSAR 17.2.6.4.1 (A)(14))

3.8.2 Turnover applicable records to NIRM in accordance with the appropriate turnover instructions.

4.0 DEFINITIONS and ABBREVIATIONS

4.1 Definitions

4.1.1 **Approved High Integrity Container** - A container used to provide the long-term stability requirement of 10 CFR 61. Approval is verified by reviewing a copy of the "Certificate of Compliance" prior to the container's use and maintaining the C of C on file during and subsequent to the container's use.

4.1.2 **Batch** - An isolated quantity of waste feed to be processed having essentially constant physical and chemical characteristics.

4.1.3 **Certificate of Compliance** (C of C) – for containers, an approval document, normally issued by the burial state licensing authority, which approves the listed container for use as a burial container. It also prescribes handling requirements and conditions for use.

4.1.4 **Low Level Radioactive Waste** (LLW)

4.1.4.1 Those low-level radioactive wastes containing source, special nuclear, or by-product material that are acceptable for disposal in a near surface land disposal facility.

4.1.4.2 Radioactive waste that contains no hazardous materials as defined in RCRA.

4.1.4.3 Radioactive waste not classified as high-level radioactive waste, transuranic waste or spent nuclear fuel.

4.1.5 **Process Control Program** (PCP) - A program that provides assurance that the methods used for processing wet low-level radioactive waste will result in a waste form that is acceptable for disposal at a licensed land disposal facility in accordance with 10 CFR 61 requirements.

4.1.6 **Reportable** - For the purposes of this procedure, means that the change meets listed requirements; therefore, PRB review is required and reporting is mandated in the Annual Radioactive Effluent Release Report.

4.1.7 **Stability** - As used in this document, "stability" means structural stability. A structurally stable waste form will generally maintain its physical dimensions and its form under expected disposal conditions. Stability can be provided by the waste form itself, processing the waste into a stable waste form, or placing the waste into a disposal container or structure that provides stability.

4.1.8 **Waste Form** - usually refers to the stability of processed waste: stable waste form or unstable waste form. Also applied to physical state of waste (i.e., liquid, solid, gas).

4.2 Abbreviations

4.2.1 **ALARA** - As Low As Reasonably Achievable

4.2.2 **BTP** – Branch Technical Position

4.2.3 **HIC** - High Integrity Container

4.2.4 **PCP** - Process Control Program

4.2.5 **PRB** –Plant Review Board

4.2.6 **RCRA** - Resource Conservation and Recovery Act

4.2.7 **RSDL** – Radiological Services Department Leader

5.0 REFERENCES

5.1 Implementing

5.1.1 75DP-0RP01, RP Program Overview

5.1.2 75DP-0RP03, ALARA Program Overview (RCTS 032633-01)

5.1.3 76RP-0RW05, Packaging and Classification of Radioactive Waste

5.1.4 76RP-0RW03, Waste Stream Sampling and Database Maintenance

5.1.5 Palo Verde Nuclear Generating Station Technical Requirements Manual Section 5.0.500.17.

5.1.6 Palo Verde Nuclear Generating Station updated Final Safety Analysis Report, Sections 11.4, 12.1, 12.3, 13.4, 13.5, and 17.2. (RCTS 032632-01)

5.1.7 USNRC Branch Technical Position ETSB 11-3, Rev 2, July 1981 "Design Guidance for Solid Radioactive Waste Management Systems Installed in Light Water Cooled Nuclear Power Reactor Plants." (RCTS 032636-01)

5.1.8 NRC Technical Position on Waste Form, Rev 1, January 1991.

5.1.9 NRC Information Notice 89-27, "Limitations on the Use of Waste Forms and High Integrity Containers for the Disposal of Low-Level Radioactive Waste," March 8, 1989.

5.1.10 NRC Information Notice 87-07, 2/3/87, "Quality Control of Onsite Dewatering / Solidification Operations by Outside Contractors."

5.2 Developmental

5.2.1 93DP-0LC07, 10 CFR 50.59 and 72.48 Screenings and Evaluations

5.2.2 10 CFR 20, "Standards for Protection Against Radiation"

5.2.3 10 CFR 61, "Licensing Requirements for Land Disposal of Radioactive Waste" (RCTS 032637-01)

5.2.4 10 CFR 71, "Packaging and Transportation of Radioactive Material"

5.2.5 49 CFR Subchapter C, "Hazardous Materials Regulations"

5.2.6 "Quality Assurance During The Operations Phase," UFSAR 17.2 (RCTS 032634-01)

5.2.7 NUREG-0472, Rev 2, July 1979, "Radiological Effluent Technical Specification for PWRs"

5.2.8 NUREG-1301, Rev.0, 4/91, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Control for Pressurized Water Reactors"

5.2.9 NUREG 0800, Rev 2, July 1981 U.S. NRC Standard Review Plan 11.4, "Solid Waste Management Systems," (RCTS 032635-01)

5.2.10 Reg Guide 1.2.1 - Measuring, Evaluating and Reporting Radioactivity in Solid Waste and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water Nuclear Power Plants, Rev. 1.

5.2.11 IE Circular 80-18, 10 CFR 50.59, Safety Evaluation for Changes to Radioactive Waste Treatment Systems

5.2.12 Commitment Action Tracking System

Partition	Commitment Number	Action Number	Procedure Section
RCTS	032632	01	5.1.6
RCTS	032633	01	5.1.2
RCTS	032634	01	5.2.6
RCTS	032635	01	5.2.9
RCTS	032636	01	5.1.7
RCTS	032637	01	5.2.3
RCTS	032648	01	3.2.1
CRDR	981853	05	3.7.1
CRDR	981853	06	3.1, 3.3

6.0 APPENDICES

Appendix A – PCP Revision Notice

PCP Revision Notice

Date: _____ Page _____ of _____

Originator: _____ Ext.: _____

Description of Revision:

_____

_____

☐ Revision is NOT reportable - PRB review, R.P. Director approval, and reporting in the annual Radioactive Effluent Release Report are not required.

☐ Revision is reportable - Requires PRB review, R.P. Director approval, reporting in the annual Radioactive Effluent Release Report, and a justification for the revision below.

Justification for Revision: (*Ensure the following items are addressed*)
(*UFSAR 13.5.2.2.E*)

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and
2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

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Approved By: _____ Date: _____

Radiological Services Department Leader

Use additional pages as required.

76DP-0RP03, Appendix-A

ELECTRONIC PROCEDURE CHANGE RECORD

(1) PROCEDURE NO: 76DP-0RP03 (2) REVISION NO: 6 CATEGORY 1 ☐ 2 ☑ 3 ☐ (3)

(4) TITLE Radwaste Process Control Program

(5) PROCEDURE ACTION: REVISION ☑ NEW ☐ SUPERSEDE ☐ CANCEL ☐ (6) EXPEDITED? YES ☐ NO ☑

(7) MRL UPDATE? YES ☐ NO ☑ (8) FULL BASIS CHECK? YES ☑ NO ☐ (9) LEVEL OF USE INFORMATION

(10) DESCRIPTION OF CHANGE

CD-600 Setup and Operating procedures added to the list of "PCP Procedures" in step 3.1.1. These procedures would have been considered part of the PCP as vendor procedures as they are "...used in processing or packaging wet waste."

TEXT DOES NOT AUTOMATICALLY ROLL TO CONTINUATION SHEET (11) DESCRIPTION - CONTINUATION YES ☐

(12) REG. REVIEW (13) 10CFR50.59/72.48 REQD? YES ☑ NO ☐ 50.59/72.48 DOC NUMBER: S-06-0462 (14)

A 10CFR50.59 Screening was performed IAW 93DP-0LC07, rev.14. It was determined that the use of the CD-600 does not require a full Evaluation per step 4.10.3.

RMC review by Mark Fladager.

Applicability Determination performed by David J. Heckman

TEXT DOES NOT AUTOMATICALLY ROLL TO CONTINUATION SHEET (15) APPLICABILITY - CONTINUATION YES ☐

EFFECTIVE DATE REQUIRED FOR PROCESSING

EFFECTIVE DATE (22)
10/19/2006

EFFECTIVE TIME [OPTIONAL] (23)

PROCEDURE CHANGE RECORD PACKAGE CONTENTS

(16) NAD REQUIRED? YES ☐ NO ☑ NAD PAGE COUNT: _____ (17)

(18) EPCR, OTHER DOCUMENTS, etc. ..... PAGE COUNT: 1 (19)

PROCEDURE PAGE COUNT: 13 (20)

TOTAL PAGE COUNT: 14 (21)

APPROVALS

Heckman, David J(Z00977) — Digitally signed by Heckman, David J (Z00977)
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Date: 2006.10.17 16:21:56 -07'00'

(24) PREPARER - SIGNATURE DENOTES THAT DOCUMENT IS READY FOR REVIEW AND APPROVAL

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Date: 2006.10.17 16:48:39 -07'00'

REVIEWER - SIGNATURE DENOTES REVIEW COMPLETION AND QUALIFIED IN SWMS AS PROCEDURE TECHNICAL REVIEWER (25)

Gray, Thomas S(Z99610) — Digitally signed by Gray, Thomas S (Z99610)
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Date: 2006.10.17 17:10:11 -07'00'

(26) NAD REVIEWER [IF REQUIRED]

OWNER/DESIGNEE - DIGITAL SIGNATURE SECURES DOCUMENT FOR TRANSMITTAL AND USE (27)