CHAPTER 11
RADIOACTIVE WASTE MANAGEMENT

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CHAPTER 11

RADIOACTIVE WASTE MANAGEMENT

11.1 SOURCE TERMS

This section of the referenced DCD is incorporated by reference with no departures or supplements.

11.2 LIQUID WASTE MANAGEMENT SYSTEM

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

11.2.1.2.4 Controlled Release of Radioactivity

Add the following information at the end of DCD Subsection 11.2.1.2.4:

LNP SUP 11.2-1 The LNP site WLS effluent discharge release point is where the WLS effluent discharge pipe connects to the cooling tower blowdown pipe. The WLS effluent discharge piping is double walled piping up to this point.

11.2.1.2.5.2 Use of Mobile and Temporary Equipment

Add the following information at the end of DCD Subsection 11.2.1.2.5.2:

STD COL 11.2-1 When mobile or temporary equipment is selected to process liquid effluents, the equipment design and testing meets the applicable requirements of Regulatory Guide 1.143. When confirmed through sampling that the radioactive waste contents do not exceed the A_2 quantities for radionuclides specified in Appendix A to 10 CFR Part 71, the liquid effluent may be processed in the Radwaste Building. When the A_2 quantities are exceeded, the liquid effluent is processed with mobile or temporary equipment in the Seismic Category I Auxiliary Building.

Mobile or temporary equipment is designed in accordance with the codes and standards listed in Table 1 and Regulatory Position C.1.1.2 of Regulatory Guide 1.143.

Mobile or temporary equipment has the following features:

- Level indication and alarms (high-level) on tanks.
- Screwed connections are permitted only for instrument connections beyond the first isolation valve.
- Remote operated valves are used where operations personnel would be required to frequently manipulate a valve.
- Local control panels are located away from the equipment, in low dose areas.
- Instrumentation readings are accessible from the local control panels (i.e., temperature, flow, pressure, liquid level, etc.).

- Wetted parts are 300 series stainless steel, except flexible hose and gaskets.
- Flexible hose is used only for mobile equipment within the designated "black box" locations between mobile components and at the interface with the permanent plant piping.
- The contents of tanks are capable of being mixed, either through recirculation or with a mixer.
- Grab sample points are located in tanks and upstream and downstream of the process equipment.

Inspection and testing of mobile or temporary equipment is in accordance with the codes and standards listed in Table 1 of Regulatory Guide 1.143 with the following additions:

- After placement in the station, the mobile or temporary equipment is hydrostatically, or pneumatically, tested prior to tie-in to permanent plant piping.
- A functional test, using demineralized water, is performed. Remote operated valves are stroked (open-closed-open or closed-open-closed) under full flow conditions. The proper function of the instrumentation, including alarms, is verified. The operating procedures are verified correct during the functional test.
- Tank overflows are routed to floor drains.
- Floor drains are confirmed to be functional prior to placing mobile or temporary equipment into operation.

11.2.3.5 Estimated Doses

Replace the information in DCD Subsection 11.2.3.5 with the following paragraphs and subsections.

LNP COL 11.2-2 Dose and dose rate to man was calculated using the LADTAP II computer code. This code is based on the methodology presented in Regulatory Guide 1.109.

LNP COL 11.5-3 Factors common to both estimated individual dose rates and estimated population dose are addressed here. Unique data are discussed in the respective sections.

Activity pathways considered are commercial fishing, sport fishing, and recreational activities.

11.2.3.5.1 Estimated Individual Dose Rates

Dose rates to individuals are calculated for fish and invertebrate consumption, and recreational activities.

Fish and invertebrate consumption assumes they are caught at the plant discharge. LADTAP II default consumption values are used in lieu of site-specific consumption data. The estimated maximum dose rates to a single organ are 0.009 mrem/yr from fish and 0.062 mrem/yr from invertebrates to an adult GI-LLI. The maximum total body dose rates are calculated to be 0.0027 mrem/yr from fish and 0.0013 mrem/yr from invertebrates to an adult.

Shoreline, swimming, and boating recreation results in a maximum dose rate to a single organ of 0.0025 mrem/yr to a teenager's skin. The maximum total body dose rate is calculated to be 0.0022 mrem/yr to a teenager.

The maximum dose rate to any organ considering all pathways was calculated to be 0.071 mrem/yr to an adult's GI-LLI. The maximum total body dose rate is calculated to be 0.0052 mrem/yr to a teenager.

Tables 11.2-201 and 11.2-202 contain LADTAP II input data for dose rate calculations. Table 11.2-203 contains total organ dose rates based on age group.

11.2.3.5.2 Estimated Population Dose

The estimated population dose within 81 km (50 miles) is calculated as 1.13 person-rem total body and 1.21 person-rem thyroid.

11.2.3.5.3 Liquid Radwaste Cost Benefit Analysis Methodology

STD COL 11.2-2

The application of the methodology of Regulatory Guide 1.110 was used to satisfy the cost benefit analysis requirements of 10 CFR Part 50, Appendix I, Section II.D. The parameters used in calculating the Total Annual Cost (TAC) are fixed and are given for each radwaste treatment system augment listed in Regulatory Guide 1.110, including the Annual Operating Cost (AOC) (Table A-2), Annual Maintenance Cost (AMC) (Table A-3), Direct Cost of Equipment and Materials (DCEM) (Table A-1), and Direct Labor Cost (DLC) (Table A-1). The following variable parameters were used:

- Capital Recovery Factor (CRF) – This factor is taken from a Table A-6 of Regulatory Guide 1.110 and reflects the cost of money for capital expenditures. A cost-of-money value of 7% per year is assumed in this analysis, consistent with the "Regulatory Analysis Guidelines of the U.S. Nuclear Regulatory Commission" (NUREG/BR-0058). A CRF of 0.0806 was obtained from Table A-6.

- Indirect Cost Factor (ICF) – This factor takes into account whether the radwaste system is unitized or shared (in the case of a multi-unit site) and

is taken from Table A-5 of Regulatory Guide 1.110. It is assumed that the radwaste system for this analysis is a unitized system at a 2-unit site, which equals an Indirect Cost Factor of 1.625.

- Labor Cost Correction Factor (LCCF) – This factor takes into account the differences in relative labor costs between geographical regions and is taken from Table A-4 of Regulatory Guide 1.110. A factor of 1(the lowest value) is assumed in this analysis.

The value of $1,000 per person-rem is prescribed in Appendix I to 10 CFR Part 50.

The analysis used a conservative assumption that the respective radwaste treatment system augment is a "perfect" system that reduces the effluent and dose by 100%. The liquid radwaste treatment system augments annual costs were determined and the lowest annual cost considered a threshold value. The lowest-cost option for liquid radwaste treatment system augments is a 20 gpm Cartridge Filter at $11,140 per year, which yields a threshold value of 11.14 person-rem total body or thyroid dose from liquid effluents.

For AP1000 sites with population dose estimates less than 11.14 person-rem total body or thyroid dose from liquid effluents, no further cost-benefit analysis is needed to demonstrate compliance with 10 CFR 50, Appendix I Section II.D.

11.2.3.5.4 Liquid Radwaste Cost Benefit Analysis

LNP COL 11.2-2

The LNP population doses are given in Section 11.2.3.5.2. As discussed above, the lowest cost liquid radwaste system augment is $11,140. Assuming 100% efficiency of this augment, the minimum possible cost per person-rem is determined by dividing the cost of the augment by the population dose. This is $9,858 per person-rem total body ($11,140/1.13 person-rem) and $9,207 per person-rem thyroid. These costs per person-rem reduction exceed the $1,000 per person-rem criteria prescribed in Appendix I to 10 CFR Part 50 and are therefore not cost beneficial.

11.2.3.6 Quality Assurance

Add the following to the end of DCD Subsection 11.2.3.6:

STD SUP 11.2-1

Since the impact of radwaste systems on safety is limited, the extent of control required by Appendix B to 10 CFR Part 50 is similarly limited. Thus, a supplemental quality assurance program applicable to design, construction, installation and testing provisions of the liquid radwaste system is established by procedures that complies with the guidance presented in Regulatory Guide 1.143.

11.2.5 COMBINED LICENSE INFORMATION

11.2.5.1 Liquid Radwaste Processing by Mobile Equipment

STD COL 11.2-1 This COL Item is addressed in Subsection 11.2.1.2.5.2.

11.2.5.2 Cost Benefit Analysis of Population Doses

STD COL 11.2-2 This COL item is addressed in Subsection 11.2.3.5.3.

LNP COL 11.2-2 This COL item is addressed in Subsections 11.2.3.5, 11.2.3.5.1, 11.2.3.5.2 and 11.2.3.5.4.

11.2.6 REFERENCES

LNP COL 11.2-2

Table 11.2-201
Dilution Factors

Input Parameter	Value
Dilution Factor for all Pathways	21[(a)]

a) The dilution factor of 21 is conservatively based on the following:

1. LNP Cooling Tower Blowdown Rate
   56,520 gpm (gallons per minute)
   81.4 Mgd (million gallons per day)
2. Crystal River Plant Discharge Canal Actual Flow Rates
   1568.2 Mgd Average 2/1/03-2/28/07
   44.4 Mgd Average 11/1/05-2/28/07
   39.2 Mgd Average 11/1/05-2/28/07
   1651.8 Mgd Total Average Existing Canal Flow Rate
3. Dilution Factor in Crystal River Discharge Canal
   = (Flow rate in canal (#2) + LNP Blowdown (#1)) / LNP Blowdown (#1)
   = (1651.8 Mgd + 81.4 Mgd) / 81.4 Mgd = 21

Table 11.2-202
LADTAP II Input for Dose Rates[a]

LNP COL 11.2-2

Input Parameter	Value
Saltwater Site	Selected
Source Term	DCD Table 11.2-7
Reconcentration Model	None
Shore Width Factor	1.0
Dilution Factors	Table 11.2-201
50-mi. Population	1,440,207
Transit time – Aquatic Food and Recreational Uses (h)[b]	0
Sport Fish Harvest (kg/yr)[b]	210,246
Commercial Fish Harvest (kg/yr)	734,960
Sport Invertebrate Harvest (kg/yr)	142,438
Commercial Invertebrate Harvest (kg/yr)	1,424,384
Shoreline Usage (person-hrs/yr)[b]	32,541,940
Swimming Exposure (person-hrs/yr)	32,541,940
Boating Exposure (person-hrs/yr)	32,071,440

a) For input parameters not specified, default LADTAP II values are used.
b) h – hour
kg/yr – kilograms per year
hrs/yr – hours per year

Table 11.2-203
Individual Dose Rates [a]

LNP COL 11.2-2
LNP COL 11.5-3

	Dose (mrem/yr)[b]							
Age Group	**Skin**	**Bone**	**Liver**	**Total Body**	**Thyroid**	**Kidney**	**Lung**	**GI-LLI**
Adult	4.53E-04	3.74E-03	6.23E-03	4.44E-03	1.19E-02	5.23E-03	2.09E-03	7.14E-02
Teenager	2.53E-03	5.65E-03	7.80E-03	5.20E-03	1.27E-02	6.83E-03	3.68E-03	5.81E-02
Child	5.28E-04	4.82E-03	5.27E-03	2.85E-03	1.14E-02	4.49E-03	1.70E-03	2.45E-02

a) Dose rates represent the summation of dose rates from each pathway
b) 10 CFR 50 Appendix I: Total Body Dose Limit = 3 mrem/yr and Dose to Any Organ = 10 mrem/yr

11.3 GASEOUS WASTE MANAGEMENT SYSTEM

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

11.3.3.4 Estimated Doses

Add the following information at the end of DCD Subsection 11.3.3.4.

LNP COL 11.3-1
LNP COL 11.5-3

The LNP site-specific values are bounded by the DCD identified acceptable releases. With the annual airborne releases listed in DCD Table 11.3-3, the site-specific air doses at ground level at the exclusion area boundary are 1.8 mrad for gamma radiation and 9.9 mrad for beta radiation. These doses are based on the annual average atmospheric dispersion factor from FSAR Section 2.3. These doses are below the 10 CFR Part 50, Appendix I design objectives of 10 mrad per year for gamma radiation or 20 mrad per year for beta radiation.

Dose and dose rate to man was calculated using the GASPAR II computer code. This code is based on the methodology presented in the Regulatory Guide 1.109. Factors common to both estimated individual dose rates and estimated population dose are addressed in this subsection. Unique data are discussed in the respective subsections.

Activity pathways considered are plume, ground deposition, inhalation, and ingestion of vegetables, meat, and milk (both cow and goat).

Based on site meteorological conditions, the highest rate of plume exposure and ground deposition occurs at the exclusion area boundary (EAB) 1.34 km (0.83 mi.) WSW of the plant.

Agricultural products are estimated from U. S. Department of Agriculture (USDA) National Agricultural Statistics Service.

Population distribution within 81 km (50-mi.) radius is presented in FSAR Tables 2.1.3-202 and 2.1.3-204.

11.3.3.4.1 Estimated Individual Doses

Dose rates to individuals are calculated for airborne decay and deposition, inhalation, and ingestion of milk (goat), meat and vegetables. Dose from plume and ground deposition are calculated as affecting all age groups equally.

Plume exposure approximately 1.34 km (0.83 mi.) WSW of the LNP produced a maximum dose rate to a single organ of 6.68 mrem/yr to skin. The maximum total body dose rate was calculated to be 1.05 mrem/yr.

Ground deposition approximately 1.34 km (0.83 mi.) WSW of the LNP produced a maximum dose rate to a single organ of 0.14 mrem/yr to skin. The maximum total body dose rate was calculated to be 0.12 mrem/yr.

Inhalation dose at the nearest residence, 2.7 km (1.7 mi.) WSW of the LNP, results in a maximum dose rate to a single organ of 0.79 mrem/yr to a child's thyroid. The maximum total body dose rate is calculated to be 0.063 mrem/yr to a teenager.

Vegetable consumption assumes that the dose is received from the gardens, approximately 2.7 km (1.7 mi.) WSW of the plant. GASPAR II default vegetable consumption values are used in lieu of site-specific vegetable consumption data as permitted by Regulatory Guide 1.109. The estimated maximum dose rate to a single organ is 8.54 mrem/yr to a child's bone. The maximum total body dose rate is calculated to be 1.88 mrem/yr to a child.

Meat consumption assumes that the dose is received from an animal, approximately 4.5 km (2.8 mi.) SSW of the LNP. GASPAR II default meat consumption values are used in lieu of site-specific meat consumption data as permitted by Regulatory Guide 1.109. The estimated maximum dose rate to a single organ is 0.098 mrem/yr to a child's bone. The maximum total body dose rate is calculated to be 0.021 mrem/yr to a child.

Goat milk consumption assumes that the dose is received from an animal, approximately 3.9 km (2.4 mi.) NNW of LNP. GASPAR II default goat milk consumption values are used in lieu of site-specific goat milk consumption data as permitted by Regulatory Guide 1.109. The estimated maximum dose rate to a single organ is 0.90 mrem/yr to an infant's thyroid. The maximum total body dose rate is calculated to be 0.12 mrem/yr to an infant.

The maximum dose rate to any organ considering every pathway is calculated to be 10.1 mrem/yr to a child's bone. The maximum total body dose rate is calculated to be 3.19 mrem/yr to a child, which includes the pathway doses (milk, meat, vegetable, and inhalation) plus the plume and ground deposition doses (Table 11.3-206). These are below the 10 CFR Part 50, Appendix I design objectives of 5 mrem/yr to total body, and 15 mrem/yr to any organ, including skin.

Table 11.3-201 contains GASPAR II input data for dose rate calculations (as noted in the table, there are no milk cows within 5 mi. of LNP). Information regarding the locations for the nearest man, milk animal, garden, and the EAB is located in FSAR Section 2.3. Table 11.3-206 contains total organ dose rates based on age group. Table 11.3-207 contains total air dose at each special location.

11.3.3.4.2 Estimated Population Dose

The estimated population dose within 81 km (50 mi.) is calculated as 5.02 person-rem total body and 7.47 person-rem thyroid.

11.3.3.4.3 Gaseous Radwaste Cost Benefit Analysis Methodology

STD COL 11.3-1

The guidance for performing cost-benefit analysis for the gaseous radwaste system is similar to that used and described for the liquid radwaste system in Section 11.2.3.5. The gaseous radwaste treatment system augments annual costs were determined and the lowest annual cost considered a threshold value. The lowest-cost option for gaseous radwaste treatment system augments is the Steam Generator Flash Tank Vent to Main Condenser at $6,320 per year, which yields a threshold value of 6.32 person-rem total body or thyroid from gaseous effluents.

For AP1000 sites with population dose estimates less than 6.32 person-rem total body or thyroid dose from gaseous effluents, no further cost-benefit analysis is needed to demonstrate compliance with 10 CFR 50, Appendix I Section II.D.

11.3.3.4.4 Gaseous Radwaste Cost Benefit Analysis

LNP COL 11.3-1

The LNP population doses are given in Section 11.3.3.4.2. The augments provided in Regulatory Guide 1.110 were reviewed and were found not to be cost beneficial in reducing the population dose of 5.02 person-rem total body. The lowest cost gaseous radwaste system augment is $6,320, which would be $6,320/5.02 person-rem or $1,259 per person-rem. This cost per person-rem reduction exceeds the $1,000 per person-rem criteria provided in Regulatory Guide 1.110 and is therefore not cost beneficial.

As shown in Section 11.3.3.4.2 and the table below, the LNP thyroid dose from gaseous effluents is 7.47 person-rem, which exceeds the 6.32 person-rem threshold value. Further analysis is provided below using the methodology of Regulatory Guide 1.110.

Source	Total Body (person-rem)	Thyroid (person-rem)	% of Total Thyroid Dose
Noble Gases	1.11E+00	1.11E+00	15%
Iodines	4.83E-03	2.49E+00	33%
Particulates	1.26E-01	9.55E-02	1%
C-14	2.80E+00	2.80E+00	37%
H-3	9.72E-01	9.72E-01	13%
Total	5.02E+00	7.47E+00	100%

Based on the estimated 7.47 person-rem/year thyroid dose, those augments with a “Total Annual Cost” less than $7,470 are considered below:

600 ft^3 Gas Decay Tank

The TAC for this augment is $7,460. Thus, to be cost beneficial at $1000 per person-rem, this augment must remove at least 7.46 person-rem (thyroid); that is decrease the thyroid dose from 7.47 to 0.01 person-rem. No iodine is released through the waste gas system as shown in DCD Table 11.3-3. This augment does not affect the iodine discharged by the plant which accounts for 2.49

person-rem in the thyroid population dose. Therefore, it would be impossible to achieve the necessary dose reduction, and this augment is not cost-beneficial.

Steam Generator Flash Tank Vent to Main Condenser

The TAC for this augment is $6,320. Thus, to be cost beneficial at $1000 per person-rem, this augment must remove at least 6.32 person-rem (thyroid); that is decrease the thyroid dose from 7.47 to 1.15 person-rem. Addition of this augment presumes that the design already includes a steam generator flash tank with the augment evaluated being installation of vent piping and instrumentation from the tank to the main condenser. The AP1000 design does not include a steam generator flash tank. Therefore, the TAC of $6,320 for this augment is underestimated. As shown in DCD Figure 10.4.8-1, the AP1000 design includes steam generator blowdown heat exchangers that provide cooling of the blowdown fluid and prevent flashing prior to the blowdown flow entering the main condenser. Therefore, this augment would not provide any additional dose reduction, and this augment is not cost-beneficial.

Conclusion

Based on the above evaluation, none of the radwaste augments are cost-beneficial in reducing the annual thyroid dose from gaseous effluents for LNP.

11.3.3.6 Quality Assurance

Add the following to the end of DCD Subsection 11.3.3.6:

STD SUP 11.3-1

Since the impact of radwaste systems on safety is limited, the extent of control required by Appendix B to 10 CFR Part 50 is similarly limited. Thus, a supplemental quality assurance program applicable to design, construction, installation, and testing provisions of the gaseous radwaste system is established by procedures that complies with the guidance presented in Regulatory Guide 1.143.

11.3.5 COMBINED LICENSE INFORMATION

11.3.5.1 Cost Benefit Analysis of Population Doses

STD COL 11.3-1

This COL item is addressed in Subsection 11.3.3.4.3.

LNP COL 11.3-1

This COL item is addressed in Subsections 11.3.3.4, 11.3.3.4.1, 11.3.3.4.2 and 11.3.3.4.4.

11.3.6 REFERENCES

Table 11.3-201
GASPAR II Input for Dose Rates

	Input Parameter	Value
LNP COL 11.3-1	Number of Source Terms	1
LNP COL 11.5-3	Distance from site to NE Corner of the United States (mi.)	1680
	Source Term	DCD Table 11.3-3
	Population Data	Table 11.3-202
	Fraction of the year leafy vegetables are grown	0.92
	Fraction of the year milk cows are on pasture	0.92[(a)]
	Fraction of max individual's vegetable intake from own garden	1.0
	Fraction of the year goats are on pasture	1.0
	Fraction of goat feed intake from pasture while on pasture	1.0
	Fraction of the year beef cattle are on pasture	0.92
	Fraction of beef-cattle feed intake from pasture while on pasture	1.0
	Total Production Rate for the 50-mile area	
	-Vegetables (kg/yr)	Table 11.3-203
	-Milk (L/yr)	Table 11.3-204
	-Meat (kg/yr)	Table 11.3-205
	Special Location Data	FSAR Section 2.3

a) There are no milk cows identified within 5 mi. of LNP.

LNP COL 11.3-1
LNP COL 11.5-3

Table 11.3-202 (Sheet 1 of 2)
Population Data

Population Data	**Distance (mi.)**									
Direction	1	2	3	4	5	10	20	30	40	50
N	0	7	51	97	26	17	918	8,049	11,760	16,050
NNE	0	6	20	20	10	384	3,850	11,390	29,590	212,100
NE	1	1	8	14	7	1,304	3,444	5,847	18,120	9,438
ENE	1	0	0	0	6	1,786	13,000	53,640	97,210	11,570
E	1	2	2	0	15	3,845	9,920	57,860	109,200	28,950
ESE	2	11	17	65	132	4,005	9,725	8,503	50,200	122,000
SE	2	11	45	468	431	2,315	35,570	41,260	21,690	38,330
SSE	2	11	37	69	406	3,628	25,890	17,100	40,270	29,610
S	2	11	19	22	62	2,126	15,520	6,006	48,660	144,800
SSW	2	7	73	610	45	145	288	0	0	0
SW	2	12	79	731	869	309	0	0	0	0
WSW	2	15	38	206	353	1,074	0	0	0	0
W	1	7	3	9	32	10	0	740	0	0

LNP COL 11.3-1
LNP COL 11.5-3

Table 11.3-202 (Sheet 2 of 2)
Population Data

Population Data	**Distance (mi.)**									
Direction	1	2	3	4	5	10	20	30	40	50
WNW	0	2	6	4	1	8	2	1,584	684	344
NW	0	2	6	7	7	3	88	1,058	1,746	7,540
NNW	0	2	32	26	51	9	659	1,323	17,730	13,140

LNP COL 11.3-1
LNP COL 11.5-3

Table 11.3-203 (Sheet 1 of 2)
Vegetable Production

Vegetable Production (kg/yr)	Distance (mi.)									
Direction	1	2	3	4	5	10	20	30	40	50
S	0	0	0	0	74,800	38,600	139,000	791,000	2,090,000	13,000,000
SSW	0	0	0	290,000	7,300	38,500	41,700	3,470	0	0
SW	0	0	245,000	339,000	189,000	32,900	405	0	0	0
WSW	0	150,000	245,000	339,000	431,000	1,970,000	4,100	0	0	0
W	0	0	0	0	0	3,000,000	731,000	309,000	0	0
WNW	0	0	0	0	0	3,590,000	7,480,000	17,000,000	5,380,000	2,880
NW	0	150,000	245,000	339,000	433,000	3,580,000	14,200,000	23,700,000	13,400,000	90,000
NNW	0	0	245,000	339,000	433,000	3,580,000	14,200,000	23,700,000	36,600,000	47,300,000
N	0	0	245,000	339,000	433,000	3,580,000	14,200,000	23,700,000	37,600,000	52,800,000
NNE	0	0	0	0	433,000	3,580,000	14,100,000	21,400,000	30,400,000	41,200,000
NE	0	0	0	0	433,000	2,140,000	9,380,000	8,580,000	18,300,000	31,800,000
ENE	0	0	0	0	0	1,380,000	4,760,000	7,910,000	11,100,000	14,200,000

LNP COL 11.3-1
LNP COL 11.5-3

Table 11.3-203 (Sheet 2 of 2)
Vegetable Production

Vegetable Production (kg/yr)	Distance (mi.)									
Direction	1	2	3	4	5	10	20	30	40	50
E	0	0	0	0	433,000	1,220,000	4,760,000	7,910,000	11,100,000	15,100,000
ESE	0	0	0	0	0	325,000	1,620,000	4,450,000	5,740,000	21,700,000
SE	0	0	0	323,000	55,300	38,600	153,000	255,000	3,520,000	6,540,000
SSE	0	0	0	0	0	38,600	153,000	598,000	2,910,000	10,700,000

LNP COL 11.3-1
LNP COL 11.5-3

Table 11.3-204 (Sheet 1 of 2)
Milk Production

Milk Production (l/yr)	**Distance (mi.)**									
Direction	1	2	3	4	5	10	20	30	40	50
S	0	0	0	0	0	6,840	24,600	1,170,000	3,560,000	4,530,000
SSW	0	0	0	0	0	6,830	7,400	615	0	0
SW	0	0	0	0	0	5,830	7	0	0	0
WSW	0	0	0	0	0	1,490	1	0	0	0
W	0	0	0	0	0	823	201	85	0	0
WNW	0	0	0	0	0	983	2,050	4,650	3,270	557
NW	0	0	0	0	0	0	3,910	6,490	11,800	17,400
NNW	0	0	67	93	119	983	3,910	6,490	8,090,000	33,900,000
N	0	0	0	0	0	983	3,910	47,400	10,300,000	21,300,000
NNE	0	0	0	0	0	985	3,920	60,000	1,730,000	2,450,000
NE	0	0	0	0	0	1,090	4,250	7,570	660,000	1,650,000

LNP COL 11.3-1
LNP COL 11.5-3

Table 11.3-204 (Sheet 2 of 2)
Milk Production

Milk Production (l/yr)	**Distance (mi.)**									
Direction	1	2	3	4	5	10	20	30	40	50
ENE	0	0	0	0	0	1,140	4,580	7,620	10,700	13,700
E	0	0	0	0	0	1,210	4,580	7,620	10,700	14,700
ESE	0	0	0	0	0	5,730	20,000	13,300	7,660	24,900
SE	0	0	0	0	0	6,840	27,200	45,200	368,000	1,400,000
SSE	0	0	0	0	0	6,840	27,200	696,000	4,910,000	6,480,000

LNP COL 11.3-1
LNP COL 11.5-3

Table 11.3-205 (Sheet 1 of 2)
Meat Production

Meat Production (kg/yr)						**Distance (mi.)**				
Direction	1	2	3	4	5	10	20	30	40	50
S	0	0	0	0	0	104,000	374,000	761,000	1,380,000	3,310,000
SSW	0	0	20,800	26,000	12,700	104,000	113,000	9,360	0	0
SW	0	0	0	0	0	88,700	1,090	0	0	0
WSW	0	0	0	0	0	181,000	349	0	0	0
W	0	0	0	0	0	255,000	62,100	26,300	0	0
WNW	0	0	0	0	0	304,000	636,000	1,440,000	518,000	19,200
NW	0	0	20,800	28,800	36,800	304,000	1,210,000	2,010,000	1,410,000	601,000
NNW	0	0	20,800	28,800	36,800	304,000	1,210,000	2,010,000	3,020,000	3,780,000
N	0	0	0	28,800	36,800	304,000	1,210,000	2,020,000	3,470,000	4,780,000
NNE	0	0	0	0	0	303,000	1,200,000	1,930,000	3,280,000	4,400,000
NE	0	0	0	0	0	239,000	990,000	1,330,000	2,370,000	3,530,000
ENE	0	0	0	0	36,800	205,000	780,000	1,300,000	1,810,000	2,330,000

LNP COL 11.3-1
LNP COL 11.5-3

Table 11.3-205 (Sheet 2 of 2)
Meat Production

Meat Production (kg/yr)						**Distance (mi.)**				
Direction	1	2	3	4	5	10	20	30	40	50
E	0	0	0	0	36,800	197,000	780,000	1,300,000	1,810,000	2,340,000
ESE	0	0	0	28,800	35,100	125,000	530,000	2,560,000	5,310,000	4,210,000
SE	0	0	0	0	15,400	104,000	413,000	687,000	3,850,000	6,260,000
SSE	0	0	20,800	20,500	13,800	104,000	413,000	824,000	1,980,000	3,550,000

LNP COL 11.5-3

Table 11.3-206
Individual Dose Rates[a]

	Dose (mrem/yr)[b]							
Age Group	**Total Body**	**GI-Tract**	**Bone**	**Liver**	**Kidney**	**Thyroid**	**Lung**	**Skin**
Adult	1.82E+00	1.82E+00	3.48E+00	1.82E+00	1.82E+00	3.44E+00	1.92E+00	7.45E+00
Teenager	2.11E+00	2.11E+00	4.89E+00	2.12E+00	2.12E+00	4.24E+00	2.23E+00	7.75E+00
Child	3.19E+00	3.18E+00	1.01E+01	3.20E+00	3.19E+00	6.80E+00	3.29E+00	8.82E+00
Infant	1.32E+00	1.32E+00	1.64E+00	1.33E+00	1.33E+00	2.78E+00	1.43E+00	6.97E+00

a) Dose rates represent the summation of dose rates from each pathway (milk, vegetable, inhalation, meat)
b) 10 CFR 50 Appendix I: Total Body Dose Limit = 5 mrem/yr, Skin Dose = 15 mrem/yr and Dose to Any Organ = 15 mrem/yr
.

LNP COL 11.5-3

Table 11.3-207
Dose in Millirads at Special Locations

Special Location	Beta Air Dose	Gamma Air Dose
EAB[(a)]	9.90	1.80
Nearest Residence/Garden	3.77	0.71
Nearest Goat Milk	0.29	0.052
Nearest Meat Animal	0.39	0.070

a) 10 CFR 50 Appendix I Design Objective: Gamma Air Dose = 10 mrad and Beta Air Dose = 20 mrad.

11.4 SOLID WASTE MANAGEMENT

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

11.4.5 QUALITY ASSURANCE

Add the following information to the end of DCD Subsection 11.4.5:

STD SUP 11.4-1 Since the impact of radwaste systems on safety is limited, the extent of control required by Appendix B to 10 CFR Part 50 is similarly limited. Thus, a supplemental quality assurance program applicable to design, construction, installation and testing provisions of the solid radwaste system is established by procedures that complies with the guidance presented in Regulatory Guide 1.143.

11.4.6 COMBINED LICENSE INFORMATION FOR SOLID WASTE MANAGEMENT SYSTEM PROCESS CONTROL PROGRAM

Add the following information to the end of DCD Subsection 11.4.6.

This COL Item is addressed below.

STD COL 11.4-1 This section adopts NEI 07-10 (Reference 201) which is currently under review by the NRC staff. The Process Control Program (PCP) describes the administrative and operational controls used for the solidification of liquid or wet solid waste and the dewatering of wet solid waste. Its purpose is to provide the necessary controls such that the final disposal waste product meets applicable federal regulations (10 CFR Parts 20, 50, 61, 71, and 49 CFR Part 173), state regulations, and disposal site waste form requirements for burial at a low level waste (LLW) disposal site that is licensed in accordance with 10 CFR Part 61.

Waste processing (solidification or dewatering) equipment and services may be provided by the plant or by third-party vendors. Each process used meets the applicable requirements of the PCP.

No additional onsite radwaste storage is required beyond that described in the DCD.

Table 13.4-201 provides milestones for PCP implementation.

11.4.6.1 Procedures

STD SUP 11.4-1 Operating procedures specify the processes to be followed to ship waste that complies with the waste acceptance criteria (WAC) of the disposal site, 10 CFR 61.55 and 61.56, and the requirements of third party waste processors.

Each waste stream process is controlled by procedures that specify the process for packaging, shipment, material properties, destination (for disposal or further processing), testing to verify compliance, the process to address non-conforming materials, and required documentation.

Where materials are to be disposed of as non-radioactive waste (as described in DCD Subsection 11.4.2.3.3), final measurements of each package are performed to verify there has not been an accumulation of licensed material resulting from a buildup of multiple, non-detectable quantities. These measurements are obtained using sensitive scintillation detectors, or instruments of equal sensitivity, in a low-background area.

Procedures document maintenance activities, spill abatement, upset condition recovery, and training.

Procedures document the periodic review and revision, as necessary, of the PCP based on changes to the disposal site, WAC regulations, and third party PCPs.

11.4.6.2 Third Party Vendors

Third party equipment suppliers and/or waste processors are required to supply approved PCPs. Third party vendor PCPs describe compliance with Regulatory Guide 1.143, Generic Letter 80-09, and Generic Letter 81-39. Third party vendor PCPs are referenced appropriately in the plant PCP before commencement of waste processing.

11.4.7 REFERENCES

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201. NEI 07-10, “Generic FSAR Template Guidance for Process Control Program (PCP) Description,” Revision 1, October 2007.

11.5 RADIATION MONITORING

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

11.5.1.2 Power Generation Design Basis

Revise the fourth bullet in DCD Subsection 11.5.1.2 as follows:

STD COL 11.5-2

- Data collection and data storage to support compliance reporting for the applicable NRC requirements and guidelines, such as General Design Criterion 64 and Regulatory Guide 1.21 and Regulatory Guide 4.15, Revision 1.

11.5.2.4 Inservice Inspection, Calibration, and Maintenance

Add the following information at the end of DCD Subsection 11.5.2.4:

STD COL 11.5-2

Daily checks of effluent monitoring system operability are made by observing channel behavior. Detector response is routinely observed with a remotely-positioned check source in accordance with plant procedures. Instrument background count rate is also observed to determine proper functioning of the monitors. Any detector whose response cannot be verified by observation during normal operation or by using the remotely-positioned check source can have its response checked with a portable check source. A record is maintained showing the background radiation level and the detector response.

Calibration of the continuous radiation monitors is done with commercial radionuclide standards that have been standardized using a measurement system traceable to the National Institute of Standards and Technology.

11.5.3 EFFLUENT MONITORING AND SAMPLING

Add the following information at the end of DCD Subsection 11.5.3.

LNP COL 11.5-2

Progress Energy is extending the existing Progress Energy Nuclear Generation Group fleet program for quality assurance of radiological effluent and environmental monitoring that is based on Regulatory Guide 4.15, Revision 1, to apply to Levy Nuclear Plant, Units 1 and 2. Regulatory Guide 4.15, Revision 1, is a proven methodology for quality assurance of radiological effluent and environmental monitoring programs that is acceptable to the NRC staff as a method for demonstrating compliance with applicable requirements of 10 CFR

Parts 20, 50, 52, 61, and 72. Use of Revision 2 of Regulatory Guide 4.15 would necessitate conducting two separate programs involving the use of common staff, facilities, and equipment, which will create an undue burden and may lead to an increased possibility for human error. Therefore, Progress Energy commits to use Regulatory Guide 4.15, Revision 1, methodology for Levy Nuclear Plant, Units 1 and 2 for optimal consistency, efficiency, and practicality.

11.5.4 PROCESS AND AIRBORNE MONITORING AND SAMPLING

STD COL 11.5-2 Add the following information at the end of the first paragraph in DCD Subsection 11.5.4.

The sampling program for liquid and gaseous effluents will conform to Regulatory Guide 4.15, Revision 1 (See Appendix 1AA).

Add the following information at the end of DCD Subsection 11.5.4.

11.5.4.1 Effluent Sampling

STD COL 11.5-2 Effluent sampling of potential radioactive liquid and gaseous effluent paths is conducted on a periodic basis to verify effluent processing meets the discharge limits to offsite areas. The effluent sampling program provides the information for the effluent measuring and reporting required by 10 CFR 50.36a and 10 CFR Part 20 and implemented through the Offsite Dose Calculation Manual (ODCM) and plant procedures. The frequency of the periodic sampling and analyses described herein are nominal and may be increased as permitted by procedure. Tables 11.5-201 and 11.5-202 summarize the sample and analysis schedules and sensitivities, respectively. The information contained in Tables 11.5-201 and 11.5-202 are derived from Regulatory Guide 1.21.

Laboratory isotopic analyses are performed on continuous and batch effluent releases in accordance with the ODCM. Results of these analyses are compiled and appropriate portions are utilized to produce the Radioactive Effluent Release Report.

11.5.4.2 Representative Sampling

The pressure head of the fluid, if available, is used for taking samples. If sufficient pressure head is not available to take samples, then sample pumps are used to draw the sample from the process fluid to the detector panels and back to the process.

For obtaining representative samples in unfiltered ducts, isokinetic probes are used as recommended by ANSI N13.1 (Reference 201).

Analytical Procedures

Typically, samples of process and effluent gases and liquids are analyzed in the station laboratory or by an outside laboratory via the following techniques:

- Gross alpha/beta counting
- Gamma spectrometry
- Liquid scintillation counting

"Available" instrumentation and counting techniques change as other instruments and techniques become available. For this reason, the frequency of sampling and the analysis of samples are generalized in this subsection.

Gross alpha/beta analysis may be performed directly on unprocessed samples (e.g., air filters) or on processed samples (e.g., evaporated liquid samples). Sample volume, counting geometry, and counting time are chosen to match measurement capability with sample activity. Correction factors for sample detector geometry, self-absorption and counter resolving time are applied to provide the required accuracy.

Liquid effluent samples are prepared for alpha/beta counting by evaporation onto steel planchets. Gamma analysis may be done on any type of sample (gas, solid or liquid) in a gamma spectrometer.

Tritiated water vapor samples are collected by condensation or adsorption, and the resultant liquid is analyzed by liquid scintillation counting techniques.

Radiochemical separations are used for the routine analysis of Sr-89 and Sr-90.

Liquid samples are collected in polyethylene bottles to minimize absorption of nuclides onto container walls.

11.5.6.5 Quality Assurance

Add the following information at the end of DCD Subsection 11.5.6.5.

STD COL 11.5-2 The sampling program and the associated monitors conform to Regulatory Guide 4.15, Revision 1 (See Appendix 1AA).

11.5.7 COMBINED LICENSE INFORMATION

STD COL 11.5-1 This section adopts NEI 07-09 (Reference 202), which is currently under review by NRC staff. The ODCM program description contains the methodology and parameters used for calculating doses resulting from liquid and gaseous effluents. The ODCM program description addresses operational setpoints, including

planned discharge rates, for radiation monitors and monitoring programs (process and effluent monitoring and environmental monitoring) for the control and assessment of the release of radioactive material to the environment. The ODCM program description provides the limitations on operation of the radwaste systems, including functional capability of monitoring instruments, concentrations of effluents, sampling, analysis, 10 CFR Part 50, Appendix I dose and dose commitments, and reporting. The ODCM program description will be finalized prior to fuel load with site-specific information.

Table 13.4-201 provides milestones for ODCM implementation.

STD COL 11.5-2 This COL Item is addressed in Subsections 11.5.1.2, 11.5.2.4, 11.5.4, 11.5.4.1, 11.5.4.2, and 11.5.6.5.

LNP COL 11.5-2 This COL item is addressed in Subsection 11.5.3.

STD COL 11.5-3 This COL Item is addressed in Subsection 11.2.3.5 and 11.3.3.4 for liquid and gaseous effluents, respectively.

Add the following subsection after DCD Subsection 11.5.7.

11.5.8 REFERENCES

201. ANSI N13.1-1999, “Sampling and Monitoring Releases of Airborne Radioactive Substances from the Stacks and Ducts of Nuclear Facilities.”

202. NEI 07-09, “Generic FSAR Template Guidance for Offsite Dose Calculation Manual (ODCM) Program Description,” Revision 0, September 2007.

STD COL 11.5-2

Table 11.5-201 (Sheet 1 of 2)
Minimum Sampling Frequency

Stream	Sampled Medium	Frequency
Gaseous	Continuous Release	A sample is taken within one month of initial criticality, and at least weekly thereafter to determine the identity and quantity for principal nuclides being released. A similar analysis of samples is performed following each refueling, process change, or other occurrence that could alter the mixture of radionuclides. When continuous monitoring shows an unexplained variance from an established norm. Monthly for tritium.
	Batch Release	Prior to release to determine the identity and quantity of the principal radionuclides (including tritium).
	Filters (particulates)	Weekly. Quarterly for Sr-89 and Sr-90. Monthly for gross alpha.

STD COL 11.5-2

Table 11.5-201 (Sheet 2 of 2)
Minimum Sampling Frequency

Stream	Sampled Medium	Frequency
Liquid	Continuous Releases	Weekly for principal gamma-emitting radionuclides. Monthly, a composite sample for tritium and gross alpha. Monthly, a representative sample for dissolved and entrained fission and activation gases. Quarterly, a composite sample for Sr-89, Sr-90, and Fe-55.
	Batch Releases	Prior to release for principal gamma-emitting radionuclides. Monthly, a composite sample for tritium and gross alpha. Monthly, a representative sample from at least one representative batch for dissolved and entrained fission and activation gases. Quarterly, a composite sample for Sr-89, Sr-90 and Fe-55.

STD COL 11.5-2

Table 11.5-202
Minimum Sensitivities

Stream	Nuclide	Sensitivity
Gaseous	Fission & Activation Gases	1.0E-04 µCi/cc
	Tritium	1.0E-06 µCi/cc
	Iodines & Particulates	Sufficient to permit measurement of a small fraction of the activity that would result in annual exposures of 15 mrem to thyroid for iodines, and 15 mrem to any organ for particulates, to an individual in an unrestricted area.
	Gross Radioactivity	Sufficient to permit measurement of a small fraction of the activity that would result in annual air dose of 1) 10 mrad due to gamma, and 2) 20 mrad of beta at any location near ground level at or beyond the site boundary.
Liquid	Gross Radioactivity	1.0E-07 µCi/ml
	Gamma-emitters	5.0E-07 µCi/ml
	Dissolved & Entrained Gases	1.0E-05 µCi/ml
	Gross Alpha	1.0E-07 µCi/ml
	Tritium	1.0E-05 µCi/ml
	Sr-89 & Sr-90	5.0E-08 µCi/ml
	Fe-55	1.0E-06 µCi/ml