



2609 North River Road, Port Allen, Louisiana 70767

(800) 401-4277 -- FAX (225) 381-2996

## American Radiation Services, Inc.

### Laboratory Analysis Report

ARS1-08-02366

*Prepared for:*

### Nuclear Regulatory Commission (NRC)

James Noggle

USNRC Region 1

475 Allendale Road

King of Prussia, PA 19406

James.Noggle@nrc.gov

Phone: 610.337.5063

  
Project Manager Review

  
Management Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

Contact Person: Questions regarding this analytical report should be addressed to:

Project Manager

ProjectManagers@amrad.com

Phone: 225.381.2991

Fax: 225.381.2996

LELAP Cert# 30658

NELAP Cert# E87558



2609 North River Road • Port Allen, Louisiana 70767

---

1 (800) 401-4277 • Fax (225) 381-2996

December 15, 2008

Nuclear Regulatory Commission  
James Noggle  
475 Allendale Road  
King of Prussia, PA 19406

Client Sample: MW-67-105-(006), MW-67-173-(006), MW-67-219-(006), MW-67-276-(006), MW-67-323-(006),  
MW-67-340-(006), MW-67-39-(006)  
ARS SGD: ARS1-08-02366

Dear Mr. Noggle,

On November 19, 2008, American Radiation Services (ARS) received 7 Ground Water Samples to be analyzed for Gamma Spectroscopy, Tritium, Strontium-90, and Nickel-63.

The samples were processed and counted using the appropriate counting equipment and QA/QC for this type of analysis. Results of the analysis and QA/QC are attached in the data package.

The sample and QA/QC's were counted with a count time sufficient to meet a statistical sound detection limits.

Counting equipment Quality Assurance was within acceptance criteria when the above referenced samples were processed.

If you have any questions please do not hesitate to call at 225-381-2991.

Sincerely,

A handwritten signature in black ink that reads 'Eugene Mulleghan'. The signature is written in a cursive, flowing style.

Laboratory Director  
American Radiation Services



2609 North River Road • Port Allen, Louisiana 70767

1 (800) 401-4277 • Fax (225) 381-2996

### COVER PAGE

Statement of Work for Analytical Laboratories

#### PROJECT SAMPLE IDENTIFICATION CROSS-REFERENCE TO ARS SAMPLE LABORATORY IDs

CLIENT SAMPLE	American Radiation Services SAMPLE ID NUMBER(S)
MW-67-105-(006)	ARS1-08-02366-001
MW-67-173-(006)	ARS1-08-02366-002
MW-67-219-(006)	ARS1-08-02366-003
MW-67-276-(006)	ARS1-08-02366-004
MW-67-323-(006)	ARS1-08-02366-005
MW-67-340-(006)	ARS1-08-02366-006
MW-67-39-(006)	ARS1-08-02366-007

#### SAMPLE RECEIPT

The samples were received in good condition. The samples were screened for radioactive contamination as per procedure ARS-062 "Sample Receiving".

#### ANALYTICAL METHODS

The Gamma Spectroscopy determinations were performed using American Radiation Services procedure ARS-006/EPA 901.1, "Gamma Emitting Radionuclides in Water." The tritium analyses were performed using American Radiation Services procedure ARS-054, "Tritium In Water". The Strontium-90 analyses were performed using American Radiation Services procedure ARS-032, "Total Strontium by Eichrom Resin Separation." The Nickel-63 analyses were performed using American Radiation Services procedure ARS-022.

#### ANALYTICAL RESULTS

The result data that are flagged with "U" indicates that the activity is below the MDC.

With regards to Gamma Spectroscopy analysis, Batch ARS1-B08-03098, the QC from Batch ARS1-B08-03097 was used due to a LIMS error when closing the batch instead of suspending the batch.

With regards to Nickel-63 analysis, the high level LCS standard (S-0178) was accidentally used for the LCS/LCSD. Due to the LCS/LCSD sample counts being higher than the yield spike counts, the activity for the LCS/LCSD could not be calculated. Due to each sample having its own yield spike, data is being released as valid per technical review.



2609 North River Road • Port Allen, Louisiana 70767

1 (800) 401-4277 • Fax (225) 381-2996

**American Radiation Services Project Manager/Laboratory Manager's Comments:**

"I certify that this sample data package is in compliance with SOW requirements, both technically and for completeness, other than the conditions detailed above. Release of the data contained in this sample data package and the computer-readable EDD, as applicable, submitted on diskette or by modem, has been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signature."

*"I certify that this electronic image, and all hardcopies produced from this image, accurately represents the data and is in compliance with the client specific requirements, both technically and for completeness, other than the conditions detailed above or in the sample data package narrative. Release, by submission through email, the data contained in this electronic image and the computer-readable EDD (as applicable), has been authorized by the laboratory Manager/Technical Director or the Manager's designee."*

  
Signature

Laboratory Director, American Radiation Services  
Title

10-18-08  
Date



2609 North River Road, Port Allen, Louisiana 70767  
 1 (800) 401-4277 FAX (225) 381-2996

ARS Sample Delivery Group: ARS1-08-02366  
 Client Sample ID: MW-67-105-(006)  
 Sample Collection Date: 11/03/08 14:21  
 Sample Matrix: Aqueous

Request or PO Number: N/A  
 ARS Sample ID: ARS1-08-02366-001  
 Date Received: 11/19/2008  
 Report Date: 12/15/08 13:39

Analysis Description	Analysis Results	Analysis Error +/- 2 s	MDC	DLC	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Tracer/Chem Recover
MN-54	0.000	1.274	4.300	2.150	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
CS-59	1.573	2.232	7.490	3.745	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
CS-58	-1.773	4.157	4.000	2.000	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
CO-60	1.251	1.226	4.100	2.050	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
ZN-65	0.350	2.638	8.940	4.470	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
NB-95	-1.446	91.923	4.120	2.060	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
ZR-95	-1.966	2.135	7.110	3.555	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
I-131	-0.044	1.099	3.690	1.845	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
CS-134	-0.404	2.513	4.250	2.125	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
CS-137	-0.024	1.036	3.510	1.755	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
BA-140	0.543	4.623	15.600	7.800	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
LA-140	1.020	1.347	4.560	2.280	U	pCi/L	ARS-006/EPA 901.1	11/24/08 16:48	JLA	N/A
SR-90	1.197	0.186	0.439	0.207	U	pCi/L	ARS-032/Eichrom SRW-01	12/11/08 16:58	BJS	57.97%
H-3	2224.035	258.733	148.503	73.073		pCi/L	ARS-054/EPA 906.0	12/6/08 13:06	BJS	N/A
NI-63	1.3287	5.5359	9.3853	4.6176	U	pCi/L	ARS-022	12/4/08 10:57	BJS	N/A

NOTES:

*Lindsay Roussel*  
 Project Manager Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate# 30658

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767  
1 (800) 401-4277 FAX (225) 381-2996

**ARS Sample Delivery Group:** ARS1-08-02366  
**Client Sample ID:** MW-67-173-(006)  
**Sample Collection Date:** 11/03/08 14:37  
**Sample Matrix:** Aqueous

**Request or PO Number:** N/A  
**ARS Sample ID:** ARS1-08-02366-002  
**Date Received:** 11/19/2008  
**Report Date:** 12/15/08 13:39

Analysis Description	Analysis Results	Analysis Error +/- 2 s	MDC	DLC	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Tracer/Chem Recovery
MN-54	0.553	1.240	4.170	2.085	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
FE-59	2.932	2.330	7.740	3.870	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
CO-58	1.296	0.948	3.140	1.570	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
CO-60	0.219	1.386	4.750	2.375	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
ZN-65	-3.501	3.067	10.200	5.100	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
NB-95	-0.719	1.319	4.420	2.210	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
ZR-95	-0.949	2.161	7.270	3.635	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
I-131*	42.372	2.428	3.570	1.785	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
CS-134	1.385	1.375	4.580	2.290	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
CS-137	-0.071	0.972	3.320	1.660	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
BA-140*	54.605	2.985	16.900	8.450	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
LA-140	0.612	1.324	4.540	2.270	U	pCi/L	ARS-006/EPA 901.1	11/24/08 17:10	JLA	N/A
SR-90	0.246	0.087	0.266	0.125	U	pCi/L	ARS-032/Eichrom SRW-01	12/11/08 16:58	BJS	100.00%
H-3	786.313	129.201	148.458	73.051	U	pCi/L	ARS-054/EPA 906.0	12/6/08 17:14	BJS	N/A
NI-63	-3.2112	4.9405	8.4401	4.1526	U	pCi/L	ARS-022	12/4/08 15:08	BJS	N/A
<b>NOTES:</b>										

*Lindsay Rausel*  
Project Manager Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate # 30658

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767

1 (800) 401-4277 FAX (225) 381-2996

**ARS Sample Delivery Group:** ARS1-08-02366  
**Client Sample ID:** MW-67-219-(006)  
**Sample Collection Date:** 11/03/08 11:31  
**Sample Matrix:** Aqueous

**Request or PO Number:** N/A  
**ARS Sample ID:** ARS1-08-02366-003  
**Date Received:** 11/19/2008  
**Report Date:** 12/15/08 13:39

Analysis Description	Analysis Results	Analysis Error +/- 2 s	MDC	DLC	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Tracer/Chem Recovery
MN-54	-0.074	1.272	4.340	2.170	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
U-59	1.290	2.205	7.500	3.750	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
P-58	-0.679	1.137	3.850	1.925	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
CO-60	0.235	1.326	4.590	2.295	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
ZN-65	-0.180	3.600	15.400	7.700	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
NB-95	1.120	1.173	3.930	1.965	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
ZR-95	1.496	2.142	7.280	3.640	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
I-131	0.085	1.103	3.730	1.865	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
CS-134	1.223	1.340	4.500	2.250	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
CS-137	0.541	1.329	4.500	2.250	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
BA-140	-7.343	9.819	18.200	9.100	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
LA-140	1.318	1.655	5.630	2.815	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:29	JLA	N/A
SR-90	0.072	0.078	0.263	0.124	U	pCi/L	ARS-032/Elchrom SRW-01	12/11/08 16:58	BJS	91.10
H-3	1159.667	160.223	149.265	73.448	U	pCi/L	ARS-054/EPA 906.0	12/6/08 21:22	BJS	N/A
NI-63	5.9061	4.8053	7.6725	3.7749	U	pCi/L	ARS-022	12/4/08 19:20	BJS	N/A

**NOTES:**

*Randy Rausel*  
 Project Manager Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate # 30658

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767

1 (800) 401-4277 FAX (225) 381-2996

**ARS Sample Delivery Group:** ARS1-08-02366  
**Client Sample ID:** MW-67-276-(006)  
**Sample Collection Date:** 11/03/08 11:39  
**Sample Matrix:** Aqueous

**Request or PO Number:** N/A  
**ARS Sample ID:** ARS1-08-02366-004  
**Date Received:** 11/19/2008  
**Report Date:** 12/15/08 13:39

Analysis Description	Analysis Results	Analysis Error +/- 2 s	MDC	DLC	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Tracer/Chem Recovery
MN-54	-0.189	1.120	3.740	1.870	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
FE-59	-1.428	2.050	6.910	3.455	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
CO-58	-0.116	1.022	3.380	1.690	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
CO-60	0.471	1.138	3.950	1.975	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
ZN-65	-2.153	2.517	8.440	4.220	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
NB-95	0.457	1.045	3.530	1.765	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
ZR-95	-4.731	4.947	6.780	3.390	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
I-131	0.633	0.921	3.080	1.540	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
CS-134	-0.931	28.852	3.620	1.810	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
CS-137	-0.741	11.594	3.860	1.930	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
BA-140	1.158	3.131	10.700	5.350	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
LA-140	0.741	1.231	4.250	2.125	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:42	JLA	N/A
SR-90	0.585	0.117	0.311	0.147		pCi/L	ARS-032/Eichrom SRW-01	12/11/08 16:58	BJS	91.10%
H-3	1012.044	147.499	148.834	73.237		pCi/L	ARS-054/EPA 906.0	12/7/08 1:30	BJS	N/A
NI-63	2.7922	4.8397	8.0917	3.9812	U	pCi/L	ARS-022	12/4/08 23:32	BJS	N/A
<b>NOTES:</b>										

*Rendray Rousel*  
 Project Manager Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate # 30658

NELAP Certificate # E87558





2609 North River Road, Port Allen, Louisiana 70767  
 1 (800) 401-4277 FAX (225) 381-2996

ARS Sample Delivery Group: ARS1-08-02366  
 Client Sample ID: MW-67-323-(006)  
 Sample Collection Date: 11/03/08 11:44  
 Sample Matrix: Aqueous

Request or PO Number: N/A  
 ARS Sample ID: ARS1-08-02366-005  
 Date Received: 11/19/2008  
 Report Date: 12/15/08 13:39

Analysis Description	Analysis Results	Analysis Error +/- 2 s	MDC	DLC	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Tracer/Chem Recovery
MN-54	-0.010	1.152	3.910	1.955	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
FE-59	-1.703	2.094	7.050	3.525	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
O-58	0.099	1.135	3.920	1.960	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
CO-60	-0.154	1.104	3.830	1.915	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
ZN-65	-3.362	3.286	11.000	5.500	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
NB-95	0.740	1.135	3.820	1.910	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
ZR-95	1.327	1.919	6.460	3.230	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
I-131*	14.588	1.677	3.320	1.660	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
CS-134	2.088	1.276	4.200	2.100	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
CS-137	0.566	1.195	3.640	1.820	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
BA-140	-6.840	14.135	17.800	8.900	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
LA-140	0.356	1.563	5.400	2.700	U	pCi/L	ARS-006/EPA 901.1	11/25/08 15:51	JLA	N A
SR-90	0.172	0.080	0.254	0.120	U	pCi/L	ARS-032/Eichrom SRW-01	12/11/08 16:58	BJS	100.00%
H-3	497.402	109.269	149.386	73.508	U	pCi/L	ARS-054/EPA 906.0	12/7/08 5:37	BJS	N A
NI-63	-0.2093	4.6176	7.8835	3.8788	U	pCi/L	ARS-022	12/5/08 3:45	BJS	N A

**NOTES:**

*Randy Rausel*  
 Project Manager - Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate# 30658

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767

1 (800) 401-4277 FAX (225) 381-2996

ARS Sample Delivery Group: ARS1-08-02366  
 Client Sample ID: MW-67-340-(006)  
 Sample Collection Date: 11/03/08 11:54  
 Sample Matrix: Aqueous

Request or PO Number: N/A  
 ARS Sample ID: ARS1-08-02366-006  
 Date Received: 11/19/2008  
 Report Date: 12/15/08 13:39

Analysis Description	Analysis Results	Analysis Error +/- 2 s	MDC	DLC	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Tracer/Chem Recovery
MN-54	-0.332	1.237	4.210	2.105	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
FE-59	0.006	1.948	6.780	3.390	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
CO-58	0.671	1.111	3.760	1.880	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
CO-60	-0.239	1.287	4.460	2.230	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
ZN-65	-1.434	3.797	10.100	5.050	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
NB-95	0.081	1.288	4.390	2.195	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
ZR-95	-2.564	4.362	7.500	3.750	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
I-131	-1.020	1.064	3.550	1.775	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
CS-134	3.308	0.975	4.960	2.480	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
CS-137	0.359	1.233	4.200	2.100	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
BA-140	0.285	4.828	16.600	8.300	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
LA-140	0.043	1.598	5.600	2.800	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:05	JLA	N/A
SR-90	0.049	0.114	0.389	0.184	U	pCi/L	ARS-032/Eichrom SRW-01	12/11/08 16:58	BJS	74.54%
H-3	598.758	115.515	148.497	73.071		pCi/L	ARS-054/EPA 906.0	12/7/08 9:45	BJS	N/A
NI-63	-2.4962	4.8498	8.2978	4.0826	U	pCi/L	ARS-022	12/5/08 7:56	BJS	N/A

NOTES:

*Lindsay Ransel*  
 Project Manager Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate# 30658

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767  
 1 (800) 401-4277 FAX (225) 381-2996

ARS Sample Delivery Group: ARS1-08-02366  
 Client Sample ID: MW-67-39-(006)  
 Sample Collection Date: 11/03/08 14:11  
 Sample Matrix: Aqueous

Request or PO Number: N/A  
 ARS Sample ID: ARS1-08-02366-007  
 Date Received: 11/19/2008  
 Report Date: 12/15/08 13:39

Analysis Description	Analysis Results	Analysis Error +/- 2 s	MDC	DLC	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Tracer/Chem Recovery
MN-54	-1.779	3.536	4.090	2.045	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
FE-59	1.199	1.853	6.290	3.145	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
PO-58	-0.244	1.846	3.550	1.775	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
CO-60	1.698	0.932	3.040	1.520	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
ZN-65	-1.092	2.872	9.730	4.865	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
NB-95	0.934	1.167	3.740	1.870	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
ZR-95	0.407	1.730	5.900	2.950	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
I-131*	15.031	1.643	3.710	1.855		pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
CS-134	1.968	1.236	4.070	2.035	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
CS-137	-0.074	1.261	3.900	1.950	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
BA-140	2.031	4.850	16.500	8.250	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
LA-140	0.070	1.420	4.960	2.480	U	pCi/L	ARS-006/EPA 901.1	11/26/08 15:34	JLA	N/A
SR-90	13.673	1.054	0.262	0.124		pCi/L	ARS-032/Eichrom SRW-01	12/11/08 16:58	BJS	99.36 %
H-3	2410.557	277.151	149.590	73.609		pCi/L	ARS-054/EPA 906.0	12/7/08 13:52	BJS	N/A
NI-63	4.2232	4.9198	8.09	3.8903	U	pCi/L	ARS-022	12/5/08 12:07	BJS	N/A
<b>NOTES:</b>										

*Rainbow Roessel*  
 Jett Manager Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate# 30658

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767  
1 (800) 401-4277 FAX (225) 381-2996

## QC Results Report

Sample Delivery Group: ARS1-08-02366  
Date Received: 11/19/08

### Laboratory Control Sample Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date	Analysis Technician	Percent Recovery (%)	LCS Acceptance Range
ARS1-B08-03097	LCS	CO-60	25337.00	505.32	242.50	25394.58		pCi/g	EPA 901.1	11/24/08	JLA	100	75%-125%
ARS1-B08-03097	LCS	CS-137	15314.00	359.16	168.10	15365.62		pCi/g	EPA 901.1	11/24/08	JLA	100	75%-125%
ARS1-B08-03097	LCS	AM-241	34148.00	11253.80	297.30	34896.70		pCi/g	EPA 901.1	11/24/08	JLA	98	75%-125%

### Blank Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date	Analysis Technician
ARS1-B08-03097	MBL	CO-60	0.001	0.001	0.037	NA	U	pCi/g	EPA 901.1	11/24/08	JLA
ARS1-B08-03097	MBL	CS-137	-0.004	0.006	0.051	NA	U	pCi/g	EPA 901.1	11/24/08	JLA
ARS1-B08-03097	MBL	AM-241	0.000	0.002	0.064	NA	U	pCi/g	EPA 901.1	11/24/08	JLA

### RER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1s)	Qual	Analysis Units	Analysis Test Method	Analysis Date	Analysis Technician	RER	RER Acceptance Range
ARS1-B08-03097	LCSD	CO-60	25337.00	505.32	25220.00	496.90		pCi/g	EPA 901.1	11/24/08	JLA	0.12	< 1
ARS1-B08-03097	LCSD	CS-137	15314.00	359.16	15106.00	336.68		pCi/g	EPA 901.1	11/24/08	JLA	0.30	< 1
ARS1-B08-03097	LCSD	AM-241	34148.00	11253.80	34495.00	1264.40		pCi/g	EPA 901.1	11/24/08	JLA	0.03	< 1

### DER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1s)	Qual	Analysis Units	Analysis Test Method	Analysis Date	Analysis Technician	DER	DER Acceptance Range
ARS1-B08-03097	LCSD	CO-60	25337.00	505.32	25220.00	496.90		pCi/g	EPA 901.1	11/24/08	JLA	0.33	< 3
ARS1-B08-03097	LCSD	CS-137	15314.00	359.16	15106.00	336.68		pCi/g	EPA 901.1	11/24/08	JLA	0.85	< 3
ARS1-B08-03097	LCSD	AM-241	34148.00	11253.80	34495.00	1264.40		pCi/g	EPA 901.1	11/24/08	JLA	0.06	< 3

  
Quality Assurance Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate# 30658

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767

1 (800) 401-4277 FAX (225) 381-2996

## QC Results Report

Sample Delivery Group: ARS1-08-02366

Date Received: 11/19/08

### Laboratory Control Sample Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date	Analysis Technician	Percent Recovery (%)	LCS Acceptance Range
1-B08-03110	LCS	CO-60	25239.00	497.17	208.80	25394.58		pCi/g	EPA 901.1	11/25/08	JLA	99	75%-125%
1-S1-B08-03110	LCS	CS-137	15200.00	344.53	149.70	15365.62		pCi/g	EPA 901.1	11/25/08	JLA	99	75%-125%
ARS1-B08-03110	LCS	AM-241	34130.00	1250.10	254.20	34896.70		pCi/g	EPA 901.1	11/25/08	JLA	98	75%-125%

### Blank Evaluation


Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date	Analysis Technician
ARS1-B08-03110	MBL	CO-60	-0.003	0.022	0.005	NA	U	pCi/g	EPA 901.1	11/25/08	JLA
ARS1-B08-03110	MBL	CS-137	-0.001	0.002	0.004	NA	U	pCi/g	EPA 901.1	11/25/08	JLA
ARS1-B08-03110	MBL	AM-241	-0.003	0.006	0.001	NA	U	pCi/g	EPA 901.1	11/25/08	JLA

### RER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1 s)	Qual	Analysis Units	Analysis Test Method	Analysis Date	Analysis Technician	RER	RER Acceptance Range
ARS1-B08-03110	LCSD	CO-60	25239.00	497.17	24161.00	522.38		pCi/g	EPA 901.1	11/25/08	JLA	1.06	< 1
ARS1-B08-03110	LCSD	CS-137	15200.00	344.53	14974.00	357.89		pCi/g	EPA 901.1	11/25/08	JLA	0.32	< 1
ARS1-B08-03110	LCSD	AM-241	34130.00	1250.10	34601.00	1255.70		pCi/g	EPA 901.1	11/25/08	JLA	0.19	< 1

### DER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1 s)	Qual	Analysis Units	Analysis Test Method	Analysis Date	Analysis Technician	DER	DER Acceptance Range
ARS1-B08-03110	LCSD	CO-60	25239.00	497.17	24161.00	522.38		pCi/g	EPA 901.1	11/25/08	JLA	2.99	< 3
ARS1-B08-03110	LCSD	CS-137	15200.00	344.53	14974.00	357.89		pCi/g	EPA 901.1	11/25/08	JLA	0.91	< 3
ARS1-B08-03110	LCSD	AM-241	34130.00	1250.10	34601.00	1255.70		pCi/g	EPA 901.1	11/25/08	JLA	0.53	< 3

  
Quality Assurance Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate# 30658

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767  
 1 (800) 401-4277 FAX (225) 381-2996

## QC Results Report

Sample Delivery Group: ARS1-08-02366  
 Date Received: 11/19/08

### Laboratory Control Sample Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date	Analysis Technician	Percent Recovery (%)	LCS Acceptance Range
ARS1-B08-03122	LCS	CO-60	25003.00	500.08	186.20	25394.58		pCi/g	EPA 901.1	11/26/08	JLA	98	75%-125%
ARS1-B08-03122	LCS	CS-137	15381.00	366.58	155.90	15365.62		pCi/g	EPA 901.1	11/26/08	JLA	100	75%-125%
ARS1-B08-03122	LCS	AM-241	33437.00	1213.40	259.10	34896.70		pCi/g	EPA 901.1	11/26/08	JLA	96	75%-125%

### Blank Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date	Analysis Technician
ARS1-B08-03122	MBL	CO-60	-0.001	0.452	0.004	NA	U	pCi/g	EPA 901.1	11/26/08	JLA
ARS1-B08-03122	MBL	CS-137	-0.001	0.013	0.004	NA	U	pCi/g	EPA 901.1	11/26/08	JLA
ARS1-B08-03122	MBL	AM-241	-0.002	0.010	0.004	NA	U	pCi/g	EPA 901.1	11/26/08	JLA

### RER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1s)	Qual	Analysis Units	Analysis Test Method	Analysis Date	Analysis Technician	RER	RER Acceptance Range
ARS1-B08-03122	LCSD	CO-60	25003.00	500.08	24310.00	538.73		pCi/g	EPA 901.1	11/26/08	JLA	0.67	< 1
ARS1-B08-03122	LCSD	CS-137	15381.00	366.58	14833.00	334.75		pCi/g	EPA 901.1	11/26/08	JLA	0.78	< 1
ARS1-B08-03122	LCSD	AM-241	33437.00	1213.40	34621.00	1270.50		pCi/g	EPA 901.1	11/26/08	JLA	0.48	< 1

### DER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1s)	Qual	Analysis Units	Analysis Test Method	Analysis Date	Analysis Technician	DER	DER Acceptance Range
ARS1-B08-03122	LCSD	CO-60	25003.00	500.08	24310.00	538.73		pCi/g	EPA 901.1	11/26/08	JLA	1.89	< 3
ARS1-B08-03122	LCSD	CS-137	15381.00	366.58	14833.00	334.75		pCi/g	EPA 901.1	11/26/08	JLA	2.21	< 3
ARS1-B08-03122	LCSD	AM-241	33437.00	1213.40	34621.00	1270.50		pCi/g	EPA 901.1	11/26/08	JLA	1.35	< 3

*Lindsay Rausel*  
 Quality Assurance Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate# 30658

NELAP Certificate # EB7558



2609 North River Road, Fort Allen, Louisiana 70767  
 1 (800) 401-4277 FAX (225) 381-2996

## QC Results Report

Sample Delivery Group: ARS1-08-02366

Date Received: 11/19/2008

### Laboratory Control Sample Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Percent Recovery (%)	CS Acceptance Range
S1-B08-03154	LCS	H3	1194.630	162.915	148.398	1250.450		pCi/L	ARS-054/EPA 906.0	12/5/08 20:32	BS	96	75% -125%

### Blank Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date/Time	Analysis Technician
ARS1-B08-03154	MBL	H3	171.099	90.953	146.730	NA		pCi/L	ARS-054/EPA 906.0	12/6/08 4:50	BS

### RER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1s)	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	RER	RER Acceptance Range
ARS1-B08-03154	LCSD	H3	1194.630	162.915	1153.645	158.440		pCi/L	ARS-054/EPA 906.0	12/6/08 0:41	BS	0.13	< 1

### DER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1s)	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	DER	DER Acceptance Range
ARS1-B08-03154	LCSD	H3	1194.630	162.915	1153.645	158.440		pCi/L	ARS-054/EPA 906.0	12/6/08 0:41	BS	0.36	< 3

  
 Project Manager Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of ARS International.

LELAP Certificate # 01949

NELAP Certificate # E87558



2609 North River Road, Port Allen, Louisiana 70767

1 (800) 401-4277 FAX (225) 381-2996

## QC Results Report

Sample Delivery Group: ARS1-08-02366

Date Received: 11/19/08

### Laboratory Control Sample Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	Percent Recovery (%)	LCS Acceptance Range
ARS1-B08-03155	LCS	Sr-90	19.93	1.5	0.297	20.68		pCi/L	ARS-032/EPA 905.0	12/11/08 16:58	BJS	96	75%-125%

### Blank Evaluation

Analysis Batch	QC Type	Analyte	Analysis Results	CSU 1 (1 s)	MDC	Expected Value	Qual	Report Units	Analysis Test Method	Analysis Date/Time	Analysis Technician
ARS1-B08-03155	MBL	Sr-90	0.276	0.097	0.3	NA	U	pCi/L	ARS-032/EPA 905.0	12/11/08 16:58	BJS

### RER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1s)	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	RER	RER Acceptance Range
ARS1-B08-03155	LCSD	Sr-90	19.93	1.5	17.73	1.4		pCi/L	ARS-032/EPA 905.0	12/11/08 16:58	BJS	0.76	< 1

### DER Duplicate Evaluation

Analysis Batch	QC Type	Analysis Description	Result 1	CSU 1 (1 s)	Result 2	CSU 2 (1s)	Qual	Analysis Units	Analysis Test Method	Analysis Date/Time	Analysis Technician	DER	DER Acceptance Range
ARS1-B08-03155	LCSD	Sr-90	19.93	1.5	17.7	1.4		pCi/L	ARS-032/EPA 905.0	12/11/08 16:58	BJS	2.15	< 3

  
Project Manager Review

Notes: American Radiation Services, Inc. assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of the client.

LELAP Certificate# 30658

NELAP Certificate # E87558





2609 North River Road • Port Allen, Louisiana 70767

1 (800) 401-4277 • Fax (225) 381-2996

## Notes:

### Comments:

- 1.0) Soil and Sludge analysis are reported on a wet basis or an as received basis unless otherwise indicated.
- 2.0) Data in this report are within the limits of uncertainty specified in the reference method unless otherwise specified.
- 3.0) Modified analysis procedures are procedures that are modified to meet the certain specifications. An example may be the use of a water method to analyze a solid matrix due to the lack of an officially recognized procedure for the analysis of the solid matrix. Modified analyses are indicated by the subsequent addition of "m" to the procedure number (i.e. 900.0M).
- 4.0) Derived Air Concentrations and Effluent Release Concentrations are obtained from 10 CFR 20 Appendix B.
- 5.0) **Total activity** is actually total gamma activity and is determined utilizing the prominent gamma emitters from the naturally occurring radioactive decay chains and other prominent radioactive nuclides. Total activity may be lower than the actual total activity due to the extent of secular equilibrium achieved in the various decay chains at the time of analysis. The total activity is not representative of nuclides that emit solely alpha or beta particles.
- 6.0) Ra-228 is determined via secular equilibrium with its daughter, Actinium 228. (Gamma Spectroscopy only).
- 7.0) U-238 is determined via secular equilibrium with its daughter, Thorium 234. (Gamma Spectroscopy only).
- 8.0) All gamma spectroscopy was performed utilizing high purity germanium detectors (HPGe).
- 9.0) ARS makes every attempt to match sample density to calibrated density; however, in some cases, it is not practical or possible to do so and data results may be affected.

### Method References:

- 1.0) EPA 600/4-80-032; Prescribed Procedures for the Measurements of Radioactivity in Drinking Water, August 1980.
- 2.0) Standard Methods for Examination of Water and Waste Water, 18<sup>th</sup>, 1992.
- 3.0) EPA SW-846; Test Methods for Evaluating Solid Waste, Third Edition, (9/86). (Updated through 1995).
- 4.0) EPA 600/4/79-020; Methods for Chemical Analysis of Water and Waste, March 1983.
- 5.0) HASL 300
- 6.0) ARS-040; An LCSD is not reported with this process. The criteria for the LCS/LCSD analysis for reproducibility have not been established for Low Level Tritium analysis. A prepared standard for Low Level Tritium has not been developed. As a result, the standard we use is based on the dilution of a verified conventional tritium standard. The volume required for Low Level Tritium analysis, in addition to the lack of an available Low Level Tritium standard, introduce variability into the LCS/LCSD analysis that does not represent the actual sample analysis. The preferred measure for reproducibility is to run a duplicate analysis of a sample.

### Definitions:

- |       |                 |   |
|-------|-----------------|---|
| 1.0)  | <b>ND</b>       | Not detected above the detection limit (non-detect).  |
| 2.0)  | <b>MDC</b>      | (Minimum Detectable Concentration) minimum concentration of the analyte that ARS can detect utilizing the specific analysis |
| 3.0)  | <b>MBL</b>      | Method Blank  |
| 4.0)  | <b>DO</b>       | Duplicate Original  |
| 5.0)  | <b>DUP</b>      | Method Duplicate  |
| 6.0)  | <b>MS/MSD</b>   | Matrix Spike/Matrix Spike Duplicate   |
| 7.0)  | <b>S</b>        | Spike   |
| 8.0)  | <b>RS</b>       | Reference Spike   |
| 9.0)  | <b>*SC</b>      | Subcontracted out to another qualified laboratory   |
| 10.0) | <b>NR</b>       | Not Referenced  |
| 11.0) | <b>N/A</b>      | Not Applicable  |
| 12.0) | <b>*</b>        | Reported as a calculated value  |
| 13.0) | <b>**</b>       | False Positive due to interference from <u>Bi-214</u>   |
| 14.0) | <b>U</b>        | Activity is below the MDC   |
| 15.0) | <b>LCS/LCSD</b> | Laboratory Control Standard/Laboratory Control Standard Duplicate   |

Notes: ARS International assumes no liability for the use or interpretation of any analytical results provided other than the cost of the analysis itself. Reproduction of this report in less than full requires the written consent of ARS International.

FORM 303

U.S. NUCLEAR REGULATORY COMMISSION

LABORATORY USE ONLY

004)

REQUEST FOR ANALYSIS AND CHAIN OF CUSTODY

CONTROL NUMBER

LABORATORY:

SAMPLE LOCATION (LICENSEE)

LICENSEE NUMBER

DOCKET NO.

INDIAN POINT ENERGY CENTER

SAMPLE SUBMITTED

# TOTAL	TYPE	VOLUME	WEIGHT	DATE SAMPLES SUBMITTED	PRIORITY
1	GROUND WATER	2000 ML	~ 2 Kg		<input type="checkbox"/> ROUTINE <input type="checkbox"/> URGENT
SAMPLE COLLECTION INTERVAL					
START		MONTH	DAY	YEAR	TIME
STOP					

ECTOR RESPONSIBLE

TELEPHONE NUMBER

Jim Noggle (USNRC)

(610) 337-5063

ANALYSIS TO BE PERFORMED	LIST DESIRED LLD (Optional)	OTHER TYPE OF ANALYSIS (Specify)	LIST DESIRED LLD (Optional)
<input type="checkbox"/> GROSS ALPHA (GA)		<input checked="" type="checkbox"/> STRONTIUM-90 (Sr90)	
<input type="checkbox"/> GROSS BETA (GB)		<input checked="" type="checkbox"/> NICKEL-63 (Ni63)	
<input checked="" type="checkbox"/> GAMMA SPEC (GS)		<input type="checkbox"/>	
<input checked="" type="checkbox"/> TRITIUM (H3)		<input type="checkbox"/>	
<input type="checkbox"/> CARBON-14 (C14)		<input type="checkbox"/>	
<input type="checkbox"/> IODINE-125 (I125)		<input type="checkbox"/>	

RELEQUISHED BY	RECEIVED BY	DATE	TIME	REASON FOR CHANGE OF CUSTODY
<i>[Signature]</i>	<i>[Signature]</i>	11/3/08	1455	VERIFY CORRECT SAMPLES
<i>[Signature]</i>	<i>[Signature]</i>	11/3/08	1455	RECEIVED CORRECT SAMPLES
<i>[Signature]</i>	<i>[Signature]</i>	11/3/08	1500	SECURED SAMPLE STORAGE
<i>[Signature]</i>	<i>[Signature]</i>	11-12-08	1420	SHIPMENT
Fed Ex	<i>[Signature]</i>	11-14-08	9:33	VERIFY SAMPLES

FEE RECOVERABLE  NO  YES TAC NUMBER \_\_\_\_\_

REMARKS:

NOTE: SAMPLES WILL BE DISCARDED AFTER ANALYSIS UNLESS REASON ARE NOTED IN REMARKS ABOVE.

